

11/14/23	Left message reminding about inspection
11/15/23	Discussed inspection and violations
11/16/23	Mr. Mclean expressed opinion that his net worth satisfied FR requirements. I told him that proof of FR had to meet federal requirements, and that a letter from his bank was not sufficient if it didn't conform to the specifications laid out in 40 CFR 280.
11/17/23	Mr. Mclean continued to assert that he had enough money to satisfy FR requirements, described Mike Madsen as A/B operator, and that he would be meeting contractors to discuss decommissioning the tanks.
12/11/23	Mr. Mclean was on site and asked Mark Drouin and me to meet him there.
12/27/23	Mr. Mclean said that he read that he'd need a Dun & Bradstreet report on his business according to the EPA FR documentation, and that he didn't think he should have to do that. He asserted that he wanted to contest the field citation. I told him I would refer the case to formal enforcement and sent him a Pre-Enforcement Notice. He called Mark Drouin to get a second opinion.
12/28/23	Mr. Mclean left a message for me saying that Mark Drouin had told him that I could decide to waive the FR violation.
12/29/23	Discussed the PEN. Mr. Mclean continued to insist that his net worth met FR requirements and that I had access to the tanks. He reiterated his intention to contest the enforcement, and that Mark Drouin had told him that I could decide to waive the violations if I wanted to. I described the formal enforcement process, and told him that after he receive the final order and notice of civil penalty, he could contest it in writing and request a hearing.