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RCRA/Citizen Suit Enforcement: Environmental Integrity Project Notice of Intent to Sue Phillips 66 Company/Los Angeles County, California Refinery

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The Environmental Integrity Project and Environmental Advocates sent an August 7th Notice of Intent to Sue (“Notice”) to Phillips 66 Company (“Phillips”) alleging violations of the Resource Conservation and Recovery Act (“RCRA”).

The Notice references Phillips Los Angeles Refinery (“Refinery”) in Los Angeles, California, which is stated to include:

- Wilmington Plant
- Carson Plant

The Refinery is stated to consist of the two referenced plants connected via pipelines.

The plants are stated to operate pursuant to two expired but administratively continued California Department of Toxic Substances Control – issued RCRA hazardous waste post-closure permits. Neither of the two referenced plants are stated to have been issued hazardous waste operating permits.

The Notice alleges violation of the RCRA regulations and the post-closure permits:

- Storing, treating, and/or disposal of hazardous waste without a permit
- Failure to make hazardous waste determinations
- Failure to adhere to the requirements of its post-closure permits
- Failure to properly operate and maintain its facilities

A copy of the Notice can be downloaded [here](#).