

Carroll-Naslund Disposal Service, INC
PO Box 418
Lewiston, ID 83501
509-758-5755

January 3rd, 2017

RE: Penalty Assessment TG-161281

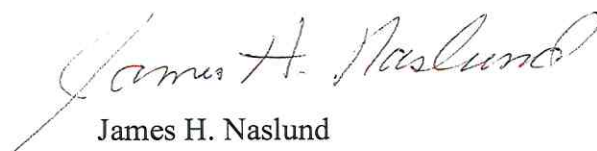
To Whom It May Concern:

Carroll-Naslund Disposal Service, INC. acknowledges that the violations listed in Penalty Assessment TG-161281 occurred, and as a result we have undertaken numerous and substantial steps to prevent any future violations. The Penalty Assessment dated December 21, 2016 lists several factors the UTC uses in determining penalties and provided a staff assessment which applies these factors to the current matter. Several of the assessments provided from Commission staff do not appear to reflect the steps Carroll-Naslund Disposal Service, INC. has taken as a result of this safety audit.

Following the safety audit, Carroll-Naslund Disposal Service, INC. conducted a thorough internal review and adopted numerous new procedures to ensure similar violations never occur again. Our new procedures and the results of our internal investigation were sent to Commission staff in a letter dated December 16, 2016 and are attached here as well.

Carroll-Naslund Disposal Service, INC. requests the Commission reevaluate its analysis in applying the penalty factors, mitigate the penalty in light of the substantial action taken detailed in the attached letter, and suspend a portion of the fine contingent on no future violations within a given time period. Carroll-Naslund Disposal Service, INC. is a family owned and operated solid waste collection company, has been in operation since 1952, has no history of similar violations or penalties in the past, and is confident that procedures have been adopted that will prevent any similar violations in the future.

Thank you,


James H. Naslund