4-19-04

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CYNTHIA VALENCIC,	)	
	)	
Petitioner,	)	
	)	
vs.	)	**OGC CASE NO. 01-1284**
	)	**DOAH CASE NO. 01-3535**
	)	
DEPARTMENT OF ENVIRONMENTAL PROTECTION and SARASOTA COUNTY UTILITIES,	)	
	)	
Respondents.	)	

DRA- closed

FINAL ORDER

On April 19, 2004, an Administrative Law Judge with the Division of Administrative Hearings ("DOAH") submitted his Recommended Order to the Department of Environmental Protection ("DEP" or "Department") in this administrative proceeding. Copies of the Recommended Order were served upon counsels for the Petitioner, Cynthia Valencic ("Valencic" or "Petitioner"), and the Co-Respondent, Sarasota County ("County"). A copy of the Recommended Order is attached as Exhibit A. The Petitioner and the Department filed Exceptions to the Recommended Order, and the County and the Department filed a joint response to the Petitioner's Exceptions. The matter is now before the Secretary of DEP for final agency action.

BACKGROUND

The County applied to the Department for a permit to construct two aquifer storage and recovery ("ASR") wells and attendant monitor wells in Sarasota County and the City of Venice. The County subsequently withdrew its application to build the ASR

well in the City of Venice, and the remaining subject matter of this proceeding is the County's application to construct the ASR well and three monitor wells in Sarasota County. The County proposes to eventually use this well to inject effluent from its Central County wastewater facility into the upper Floridan aquifer, 500-700 feet below the surface. The injected effluent will be temporarily stored in the aquifer until such time as it is withdrawn to satisfy demand for reuse water in the County. On July 19, 2001, the Department published a Notice of Intent to issue the permit to the County to construct the ASR well.

This ASR well is a Class V, Group 3 well, and is permitted pursuant to Chapter 62-528, Florida Administrative Code, regulating Underground Injection Control. In order to operate a Class V injection well, one must first obtain a construction permit and test the well after it is constructed. The testing procedure is authorized through a minor modification of the construction permit.

The instant proceeding arose out of a petition filed by the City of Venice challenging DEP's Notice of Intent, and Valencic intervened in the proceeding under §403.412(5), Florida Statutes (2001). The City of Venice and the County subsequently settled the City's objections, but Valencic continued to pursue her permit challenge. DEP forwarded the matter to DOAH for formal administrative proceedings, and the case was assigned to Administrative Law Judge, Donald R. Alexander (the "ALJ"). The ALJ held a DOAH final hearing in Sarasota, Florida, on August 20, 21, 22, and 27, 2002.

The ALJ concluded in his subsequent Recommended Order that the County had provided the Department with sufficient reasonable assurances and recommended that the Department grant Permit No. 160882-001-UC for construction of a Class V, Group 3

aquifer storage and recovery injection well. The ALJ further found that because there was no proof that the construction of the proposed well would harm the environment, the Petitioner lacked standing to pursue her action.

STANDARDS OF ADMINISTRATIVE REVIEW OF RECOMMENDED ORDERS

Section 120.57(1)(l), Florida Statutes, prescribes that an agency may not reject or modify findings of fact in a recommended order, "unless the agency first determines from a review of the entire record, and states with particularity in the order, that the findings of fact were not based on competent substantial evidence." An agency may not reweigh the evidence, attempt to resolve conflicts therein, or judge the credibility of witnesses. Such evidentiary matters are within the province of the ALJ. See, e.g., Dunham v. Highlands County School Board, 652 So.2d 894 (Fla. 2d. DCA 1995); Florida Dept. of Corrections v. Bradley, 510 So.2d 1122 (Fla. 1st DCA 1987).

Section 120.57(1)(l), Florida Statutes, states that an agency may modify or reject those conclusions over which it has "substantive jurisdiction." The related Florida case law holds that an agency has the primary responsibility of interpreting statutes and rules within its regulatory jurisdiction and expertise. See e.g., Public Employees Relations Comm. v. Dade County Police Benevolent Assn., 467 So.2d 987, 989 (Fla. 1985); Florida Public Employees Council, 79 v. Daniels, 646 So.2d 813, 816 (Fla. 1st DCA 1994).

Great deference should be given to agency interpretations of statutes and rules within their regulatory jurisdiction, and such interpretations should not be overturned unless "clearly erroneous." Dept. of Environmental Regulation v. Goldring, 477 So.2d 532, 534 (Fla. 1985). These agency interpretations of their own statutes and rules do

not have to be the only reasonable interpretations. It is enough if such agency interpretations are "permissible" ones. Suddath Van Lines, Inc. v. Dept. of Environmental Protection, 668 So.2d 209, 212 (Fla. 1st DCA 1996).

RULINGS ON THE DEPARTMENT'S EXCEPTIONS

The Department filed exceptions requesting that the ALJ's Findings of Fact Nos. 6, 10, and 22 be "clarified" in this Final Order. However, I do not have the power to "clarify" findings of fact in a DOAH recommended order. I am only authorized to reject or modify the ALJ's factual findings, if they are not based on competent substantial evidence. See § 120.57(1)(l), Florida Statutes. Therefore, the Department's exceptions are denied on procedural grounds.

RULINGS ON THE PETITIONER'S EXCEPTIONS

The Petitioner filed 23 exceptions, which will be referred to in the order they appear in Petitioner's Exceptions to the Recommended Order. The corresponding paragraph numbers in the Petitioner's Exceptions are in parentheses. Citations to the transcript are by volume ("Vol.") and roman numeral (I-IV) followed by the page number.

Petitioner's First Exception (¶ 5), Second Exception (¶ 6), and Third Exception (¶ 7)

These three exceptions are all "clerical" in nature and are consolidated for consideration. The Petitioner correctly notes in her exception to the fourth unnumbered paragraph on page 3 of the Recommended Order that the settlement between the County and the City of Venice was entered on August 15, 2002, rather than on August 12, 2002, as recited by the ALJ. The Petitioner also correctly asserts in her exception to the second unnumbered paragraph on page 4 of the Recommended Order that her exhibits 1-5, 5-11, and 13-22 were accepted into evidence. The Petitioner is also

correct in her assertion that the second unnumbered paragraph on page 4 of the Recommended Order fails to include Lori Carroll in the list of witnesses presented by the County. These three clerical exceptions are thus granted, but are deemed to have no bearing on the outcome of this proceeding.

Petitioner's Fourth (¶ 8) and Fifth Exceptions (¶ 9).

These related exceptions contest the ALJ's finding in the second unnumbered paragraph on page 5 of the Recommended Order that the parties did not agree to extend the time for filing their proposed findings of fact and conclusions of law and that the County did not meet the deadline of March 31, 2004. I find that there is competent substantial evidence to support these findings and they are irrelevant to the outcome of this proceeding. I would also note that the Petitioner did not file a motion to strike the County's proposed findings of fact and conclusions of law and has not asked for any curative relief. Therefore, these two exceptions are denied.

Petitioner's Sixth Exception (¶ 11)

In this exception, the Petitioner accurately notes that the phrase "test well" in paragraphs 1, 2, 3, 14, 15, 20, 32, and 53 of the Recommended Order is not found in Part VI of Florida Administrative Code Chapter 62-528 to describe Class IV ASR wells. Nevertheless, this phrase is used in the proposed permit to describe the well the County seeks to construct and was used throughout the DOAH hearing without any confusion. The use of the phrase underscores the intent of the County to use the well to test the feasibility of implementing an ASR system at this site. Although the better practice would have been to consistently use the terms that are in the rules, I do not find the use of the term "test well" to be unduly confusing. This exception is denied.

Petitioner's Seventh Exception (¶ 12)

This exception objects to the ALJ's characterization of her as a long time employee of LEAF in paragraph 3 of the Recommended Order. However, this information was elicited in Petitioner's direct testimony (V. IV, 90) and, in any event is irrelevant to the issues in this case. This exception is thus denied.

Petitioner's Eighth Exception (¶ 13)

The Petitioner takes exception to the ALJ's discussion of the public policy implications of ASR as irrelevant in paragraph 3 of the Recommended Order. I agree with the Petitioner that I am constrained to consider the permit application under the reasonable assurances standard rather than a public policy standard. Nevertheless, I believe this recitation of the public policy implications of ASR to be background information by the ALJ that is supported by competent substantial evidence. Therefore, I deny the exception as irrelevant to the substantive issues in this proceeding. See, e.g., Adult World, Inc. v. State Div. of Alcoholic Beverages and Tobacco, 408 So.2d 603, 607 (Fla. 5th DCA 1982).

Petitioner's Ninth Exception (¶ 14)

In this exception, the Petitioner objects to the ALJ's characterization of ASR as a "reuse program," rather than as a component of a reuse program. Rule 62-610.466(2), Florida Administrative Code, clarifies the distinction:

> Aquifer storage and recovery can be an effective and environmentally sound approach to provision of storage for reclaimed water for reuse systems regulated under Part III of Chapter 62-610, F.A.C. Aquifer storage and recovery by itself does not constitute "reuse." It is only when reclaimed water, which has been stored in an aquifer, is recovered and used for beneficial purposes that the reclaimed water is considered to be "reused." Aquifer storage and recovery systems are considered components of the overall reuse system.

I thus grant this exception, but deem it to have no bearing on the outcome of this case.

Petitioner's Tenth Exception (¶ 15)

This exception of the Petitioner objects to the statement in paragraph 7 of the Recommended Order that the recovery rate of water in an ASR system is "generally around 100 percent." I find that the challenged statement of the ALJ is an acceptable paraphrase of the testimony of record and that it is supported by competent substantial evidence. This exception is thus denied.

Petitioner's Eleventh Exception (¶ 16)

This exception objects to the ALJ's finding in paragraph 13 of the Recommended Order that the County "intends to use reclaimed water from its Central County wastewater facility." This finding is supported by competent substantial evidence and is adopted. Further, the manner in which the reclaimed water from the facility is presently used is irrelevant. This exception is denied.

Petitioner's Twelfth Exception (¶ 17)

This exception objects to the ALJ's finding of fact in paragraph 17 of the Recommended Order stating that the effluent from the Central County wastewater facility presently meets drinking water standards. After reviewing the entire record, I concluded that this finding is not supported by any competent substantial evidence of record. In fact, all parties admit that the effluent does not presently meet drinking water standards. This exception is thus granted, but is deemed to have no bearing on the outcome of this proceeding.

Petitioner's Thirteenth Exception (¶ 18)

This exception objects to paragraph 21 of the Recommended Order in which the ALJ states that "all domestic wastewater wells" are Class V, Group 3 wells. I agree with the Petitioner that this rule interpretation by the ALJ is erroneous.[1] This exception is thus granted and the word "all" is stricken from paragraph 21, but this modification has no bearing on the outcome of this case.

Petitioner's Fourteenth Exception (¶ 19)

I agree with the Petitioner's objection to the ALJ's description of the permit as an "operation permit" rather than a "construction permit" in paragraph 47 of the Recommended Order. This exception is thus granted, but is deemed to have no bearing on the outcome of this case.

Petitioner's Fifteenth Exception (¶ 23)

This exception of the Petitioner objects to an evidentiary ruling by the ALJ summarized on page 4 of the Recommended Order that prevented her from introducing the depositions of John Vecchioli, Charles Drake, and James Christopher. This evidentiary ruling is outside the area of DEP's regulatory expertise. I thus have no authority to disturb this ruling, regardless of its merits. Barfield v. Department of Health, Board of Dentistry, 805 So.2d 1008 (Fla. 1st DCA). I thus reject this exception as raising a matter beyond the scope of this agency's substantive jurisdiction.

Petitioner's Sixteenth Exception (¶ 24)

This exception to paragraph 20 of the Recommended Order contains the major issue in this case, i.e., whether the challenged construction permit only authorizes the

[1] Pursuant to § 120.57(1)(l), F.S., I find that the substituted rule interpretation is more reasonable than the ALJ's interpretation which was rejected

simple construction of the well or also includes the operational testing of the ASR system. However, I disagree with the Petitioner's interpretation of the permit and rule provisions governing the issuance of the subject ASR well permit.

The ALJ found that the permit "only authorizes the construction of the well itself." This interpretation is supported by the plain wording of the permit, as explained by Judith Richtar, the Department's witness (V III, 99). The permit includes Specific Conditions (1)(c) ("No fluid shall be injected without written authorization from the Department. . . . "); (4)(a) (". . . Operational testing shall not commence until issuance of a minor permit modification with authorization from the Department."); and (4)(c) (". . . The [cycle testing] schedule shall be submitted with a request for minor modification of this permit and the applicable processing fee.").

As these provisions show, if this permit is issued, the County will have no authority to send water of any quality down the well until the Department modifies the permit to allow testing of the well. Further, the Department will not allow testing of the well unless the County provides reasonable assurance that the applicable rules regarding water quality and the operation of the well will not be violated. As explained by Ms. Richtar, such authorization is typically done through a minor modification of the construction permit pursuant to Rule 62-528.355(5), Florida Administrative Code. Due to the heightened public interest in this case, however, the Department has agreed to require public notification of its decision to allow testing of the well (V III, 100).

The Petitioner also fears that allowing the County to build the proposed well, rather than a less expensive exploratory well, will result in the Department feeling pressured to approve the operation of the ASR system regardless of whether it has

reasonable assurances that the ASR will meet the rule requirements. This fear is unfounded because Department rules prevent the injection of fluid into the ASR well that does not meet applicable standards. See Rule 62-528.610(3), Florida Administrative Code, stating that "Pretreatment for fluids injected through existing wells shall be performed if necessary to ensure that the injected fluid does not violate the applicable water quality standards in Chapter 62-510, F.A.C. . . ."

For the above reasons, this exception is denied.

Petitioner's Seventeenth Exception (¶ 25)

This exception of the Petitioner objects to paragraph 70 of the Recommended Order, wherein the ALJ interprets the provisions of § 403.0881, Florida Statutes. Pursuant to this statutory section, an applicant desiring to build and operate an injection well is required to apply for a construction permit first and an operation permit after construction is completed. This bifurcated permitting system does not require that all the information required for the operation permit be submitted at the time the construction permit application is submitted. In some instances, such as when a new sewage treatment system is constructed, it is impossible to include operational data.

The Petitioner argues that Santa Fe Lake Dwellers Ass'n, Inc. v. Dept. of Environmental Regulation, et al., DOAH Case No. 85-4446 (DOAH Recommended Order April 8, 1987; DER Final Order May 21, 1987) requires the Department to consider the operation of the ASR well as part of this construction permit application. Specifically, the Petitioner argues that the Department must consider the quality of the effluent presently being produced at the Central County wastewater treatment plant because the County intends to eventually inject that effluent into the well.

The ALJ held that the Santa Fe Lake Dwellers final order does not apply to this case because it involved the construction of a sewage treatment plant, rather than an injection well; and because the subsequent enactment of § 403.0881, Florida Statutes, "relaxed" the level of detail required for applications for injection well construction permits. I agree with the ALJ that the enactment of § 403.0881, Florida Statutes, changed the statutory requirements for construction applications, but find that Santa Fe Lake Dwellers continues to have some significance. Despite the new statutory language, the Department still must consider some aspects of the operation of the facility while it considers the construction permit application.

The Santa Fe Lake Dwellers case involved the proposed construction of a new sewage treatment plant designed to discharge to percolation ponds. The petitioners alleged that the proposed discharge threatened surface waters. The Santa Fe Lake Dwellers final order concluded that the future operation of the plant was properly a subject for consideration in the construction permit. The order then went on to provide:

> . . . When a construction permit is sought, the issue for determination is whether the plant, if built according to design specifications, can meet the criteria of Chapter 403, Florida Statutes, and Department rules. Only when this threshold demonstration is made by the applicant that the proposed facility is potentially able to comply with the rules can the construction permit be issued.
>
> After the facility is built in accordance with that construction permit, then the applicant must demonstrate that the facility as built actually does comply with the permitting criteria in order to be entitled to issuance of an operating permit. Although the two permits are distinct, the focus is the same: will the facility cause pollution in violation of the Department rules or the provisions of Chapter 403. If the proposed design and operation of the plant show that it can meet permitting criteria, a construction permit may issue. If the plant as constructed actually does comply with the rule criteria, then issuance of an operating permit may be appropriate. At each stage, though, consideration of operational factors is appropriate.

The above-described process is still embodied in § 403.0881, Florida Statutes. However, the operational factors to be considered will depend on the facility to be constructed. For example, deeply buried geological structures are very important in the operation of ASR wells, but less so in the operation of most sewage treatment plants. In one significant regard, permitting an ASR well such as the one at issue in this case presents the Department with unique challenges not encountered in processing other construction permit applications. Because the local geology is not adequately understood, the well must be constructed in order to determine whether the ASR system will work as anticipated.

In this case, then, the testing and operation of the ASR well (as opposed to its construction) is dependent on two broad categories of data. The first category relates to the issues of whether the assumptions about the subsurface geology made in the construction permit application are accurate and whether the system will function as intended. The second category relates to the issue of whether the fluid that will be injected into the well meets applicable standards. The first category of data cannot be evaluated until the well is dug. Manasota-88, Inc. v. Manatee County and State of Fla., Department of Environmental Regulation, DOAH Case No. 85-2731 (DOAH Recommended Order May 5, 1986; DER Final Order June 19, 1986).

Accordingly, the narrow questions for the Department in processing this construction permit are whether the ASR well will function as designed, assuming water of suitable quality is available for injection and given what is known of the geology, and whether the construction of the well, itself, will cause water quality violations due to the

manner of its construction. Therefore, to the extent described above, I modify the ALJ's interpretation of Santa Fe Lake Dwellers, but otherwise reject this exception.[2]

Petitioner's Eighteenth Exception (¶ 26)

In this exception, the Petitioner challenges the ALJ's statement in paragraph 54 of the Recommended Order that exploratory wells are only required for Class I well construction and not Class V. The Petitioner is correct that Rule 62-528.603, Florida Administrative Code, provides that exploratory wells can be required for Class V wells, but the rule does not require that exploratory wells be used. As discussed in the prior ruling on the Petitioner's seventeenth exception, the well to be constructed under this permit can serve to gather the same geological information as would be obtained through the construction of an exploratory well. The Petitioner's exception is thus granted in part and denied in part. The ALJ's challenged interpretation of Rule 62-528.603 is rejected, but is deemed to be harmless error.[3] However, this exception is denied to the extent it contends that the Department must require an exploratory well.

Petitioner's Nineteenth Exception (¶ 27)

This exception of the Petitioner objects to the ALJ's findings in paragraphs 55 and 57 of the Recommended Order that the permit application and responses to requests for more information were properly signed. Rule 62-528.340(2), Florida Administrative Code, requires that the application from the County be signed by a "principal executive officer or ranking elected official. At the hearing, the County

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[2] Pursuant to § 120.57(1)(l), F.S., I find that the substituted conclusion of law is more reasonable than the ALJ's conclusion which was rejected.

[3] Pursuant to § 120.57(1)(l), F.S., I find that the substituted rule interpretation is more reasonable than the ALJ's interpretation which was rejected

Administrator, James L. Ley, executed a copy of the original application in order to cure any confusion about the sufficiency of the original signatures. The ALJ found the signatures and previously issued letters delegating the authority to sign were sufficient to satisfy the rule requirements. I conclude that the ALJ's finding is supported by competent substantial evidence, and deny this exception.

Petitioner's Twentieth Exception (¶ 28)

This exception of the Petitioner objects to the ALJ's conclusion in paragraph 58 of the Recommended Order that the County does not have to meet all treatment and disinfection requirements in Rules 62-610.466 and 62-528.563, Florida Administrative Code. The ALJ concluded, and I agree, that the cited rule provisions only apply to this ASR well when the County applies to the Department to inject water into the well during the testing or operation phases. As discussed in the prior ruling on the Petitioner's Seventeenth exception, nothing can be injected into the well without Department authorization. Only at that time will the County be required to comply with the provisions of Rules 62-610.466 and 62-528.563. This exception is thus denied.

Petitioner's Twenty-first Exception (¶ 30)

In this exception, the Petitioner objects to the ALJ's finding in paragraph 30 of the Recommended Order that Rule 62-528.630(3), Florida Administrative Code, only applies to operation permits. That rule provides:

> No underground injection control authorization by permit or rule shall be allowed where a Class V well causes or allows movement of fluid containing any contaminant into underground sources of drinking water, and the presence of that contaminant may cause a violation of any primary drinking water regulation under Chapter 403, F.S., and Chapter 62-550, F.A.C., or which may adversely affect the health of persons.

I agree with the Petitioner that the quoted rule provisions also apply to construction permits, but only to the extent that the construction of the well (rather than its operation) "causes or allows the movement of fluid containing any contaminant into underground sources of drinking water." In this regard, the ALJ found in paragraph 25 of the Recommended Order that "[t]he evidence shows that the migration of fluids between aquifers will be prevented as a part of the design and construction of the ASR well program." His finding is supported by competent substantial evidence. I reject the Petitioner's argument that the subject rule requires the Department to consider, in this proceeding, the quality of the water that may one day be injected into the well. This exception is thus denied.

Petitioner's Twenty-second Exception (¶ 32)

This exception objects to the ALJ's finding in paragraphs 59 and 60 of the Recommended Order that the Petitioner did not challenge the conditions of the permit as it relates to construction standards (a review of a construction permit is limited to the details of its construction, rather than its operation). The ALJ found, and the Petitioner admits, that she did not raise issues related to construction standards in her Petition. A permit challenger cannot, by filing a petition for administrative hearing, require the applicant to "completely prove anew" every item in a permit application down to the last detail, and the challenger must "identify the areas of controversy." Florida Dept. of Transportation v. J.W.C. Co., Inc., 396 So.2d 778, 789 (Fla. 1st DCA 1981). Even if she had properly raised the issue of construction standards, the ALJ found that the County provided reasonable assurance that construction would not be a problem. These findings are supported by competent substantial evidence. This exception is denied.

Petitioner's Twenty-third Exception (¶ 33)

This final exception of the Petitioner objects to the ALJ's conclusions in paragraph 66 of the Recommended Order relating to the issue of standing. The ALJ's determination that the Petitioner lacks standing to maintain this action is based on his conclusions that the construction permit does not authorize injection of any material into the well for either testing or operation and that it is possible that the well will never be used. Because the Petitioner's challenge was premised upon the quality of the effluent produced at the Central County facility, her challenge is premature. The only issues that could be properly raised at this time relate to the construction details of the permit, and the County provided reasonable assurances on those issues. The Petitioner's final exception is denied.

It is therefore ORDERED:

A. To the extent that the Recommended Order (Exhibit A) has not been modified by the above rulings, it is adopted and incorporated herein by reference.

B. The County's requested permit in DEP File No. 160882-001-UC for a Class V, Group 3, aquifer storage and recovery injection well is ISSUED.

Any party to this proceeding has the right to seek judicial review of the Final Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, M.S. 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal.

The Notice of Appeal must be filed within 30 days from the date this Final Order is filed with the clerk of the Department.

DONE AND ORDERED this 2nd day of June, 2004, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Colleen M. Castille

COLLEEN M. CASTILLE

Secretary
Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

FILED ON THIS DATE PURSUANT TO § 120.52, FLORIDA STATUTES, WITH THE DESIGNATED DEPARTMENT CLERK, RECEIPT OF WHICH IS HEREBY ACKNOWLEDGED.

Cynthia Kinsey
Deputy CLERK

6-3-04
DATE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Order has been sent by United States Postal Service to:

Jeanne Marie Zokovitch Paben, Esquire
Scott Randolf, Esquire
David Ludder, Esquire
1114 Thomasville Road, Suite E
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Ann Cole, Clerk and
Donald R. Alexander, Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, FL 32399-1550

and by hand delivery to:

Nona Schaffner, Esquire
Department of Environmental Protection
3900 Commonwealth Blvd., M.S. 35
Tallahassee, FL 32399-3000

this 4th day of June, 2004.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

for D. Terrell Williams

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