

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

BALMAR LLC

AI # 42712

PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT
LA. R.S. 30:2001, ET SEQ.

* Settlement Tracking No.
* SA-MM-18-0034
*
* Enforcement Tracking No.
* MM-CN-17-00533
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SETTLEMENT

The following Settlement is hereby agreed to between Balmar LLC (“Respondent”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

I

Respondent is a limited liability company that owns and/or operates a lubricant blending company (referred to as a chemical blending company in MM-CN-17-00533) located in Lafayette, Lafayette Parish, Louisiana (“the Facility”).

II

On September 20, 2017, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. MM-CN-17-00533 (Exhibit 1).

III

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

IV

Nonetheless, Respondent, without making any admission of liability under state or federal

statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of SEVEN THOUSAND NINE HUNDRED TWENTY-FIVE AND NO/100 DOLLARS (\$7,925.00), of which Six Hundred Forty-Two and 64/100 Dollars (\$642.64) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

V

Respondent further agrees that the Department may consider the inspection report(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VI

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

VII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties

set forth in La. R. S. 30:2025(E) of the Act.

VIII

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

IX

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Lafayette Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

X

Payment is to be made in five (5) equal installments. The first installment of \$1,585.00 shall be paid within ten (10) days from notice of the Secretary's signature. The remaining four (4) installments of \$1,585.00 each shall be paid quarterly thereafter; all installments shall be paid within one year of the due date of the first installment. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

XI

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

XII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

BALMAR LLC

BY: [Signature]
(Signature)

Randall Ahrabi
(Printed)

TITLE: MBR

THUS DONE AND SIGNED in duplicate original before me this 21st day of December, 20 18, at my office in Lafayette, LA.

[Signature]
NOTARY PUBLIC (ID # 129926)

Kori Hollic
(stamped or printed)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Chuck Carr Brown, Ph.D., Secretary

BY: [Signature]
Lourdes Iturralde, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 25th day of April, 20 19, at Baton Rouge, Louisiana.

[Signature]
NOTARY PUBLIC (ID # 19181)

Perry Theriot
(stamped or printed)

Approved: [Signature]
Lourdes Iturralde, Assistant Secretary



JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

September 20, 2017

CERTIFIED MAIL (7014 1200 0000 7864 1935/1942)
RETURN RECEIPT REQUESTED

BALMAR LLC
c/o Kenny Oliver
Agent for Service of Process
100 Rue Bastille
Lafayette, LA 70508

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. MM-CN-17-00533
AGENCY INTEREST NO. 42712**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **BALMAR LLC (RESPONDENT)** for the violations described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Adrienne Landry at (225) 219-3805 or Adrienne.Landry@la.gov.

Sincerely,

Celena J. Cage
Administrator
Enforcement Division

CJC/ARL/arl
Alt ID No. LAR000079301
Attachment



c: BALMAR LLC
c/o Kori Hollier – Operations Manager
616 West Pont Des Mouton Road
Lafayette, LA 70507

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF

BALMAR LLC
LAFAYETTE PARISH
ALT ID NO. LAR000079301

PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT,
La. R.S. 30:2001, ET SEQ.

*
*
* ENFORCEMENT TRACKING NO.
*
* MM-CN-17-00533
*
* AGENCY INTEREST NO.
*
* 42712
*

CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **BALMAR LLC (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

I.

The Respondent owns and/or operates Balmar LLC, a chemical blending company, located at 616 West Pont Des Mouton Road, in Lafayette, Lafayette Parish, Louisiana. The Respondent is registered as a large quantity generator of hazardous waste and is registered under EPA identification No. LAR000079301.

II.

During the course of the May 6, 2013 inspection, the Department observed extensive housekeeping issues at the facility, including but not limited to: unlabeled and/or open containers of various sizes located throughout the facility; leaking and/or rusting containers located throughout the facility; leaking components of equipment in at least two (2) locations on-site; and areas of stained soil located throughout the facility. During the January 27, 2017 inspection, the Department observed

improvements made to the facility's housekeeping practices. The Department did not observe any soil staining at the facility, nor did the Department observe leaking and/or rusting containers. The unlabeled and/or open containers observed throughout the facility during the May 6, 2013 inspection were no longer on-site during the January 27, 2017 inspection. The facility's operations manager stated the materials in the containers were identified and disposed of accordingly.

III.

On or about June 14, 2017, Warning Letter HE-L-17-00533 was issued to the Respondent. A response was received by the Department on or about July 14, 2017.

IV.

On or about May 6, 2013 and January 27, 2017, the Department conducted inspections at the above referenced facility to determine the degree of compliance with the Louisiana Environmental Quality Act (the Act) and the supporting Regulations. While the investigation by the Louisiana Department of Environmental Quality (the Department) is not yet complete, the following violations were noted during the course of the inspections:

- A. The Respondent caused and/or allowed the unauthorized disposal and processing of solid waste without a permit and/or authority from the Department, in violation of La. R.S. 30:2155 and LAC 33:VII.315.C. Specifically, during the May 6, 2013 inspection, the Department observed a solid waste disposal area on the ground containing scrap metal and construction and demolition debris. During the January 27, 2017, the Department did not observe solid waste on the ground. The facility now utilizes dumpsters and roll off containers on-site for the disposal of solid waste; therefore, this violation has been addressed.
- B. The Respondent failed to determine if solid wastes generated at its facility were hazardous wastes, in violation of LAC 33:V.1103. Specifically, the Respondent failed to determine if various wastes located throughout the facility are hazards. During the May 6, 2013 inspection, the Department observed materials including but not limited to: Numerous fifty-five (55) gallon drums and multiple containers of various sizes containing waste materials located throughout the facility; material spilled within earthen secondary containment systems located throughout the facility; and solid waste comingled with an oily substance. The Respondent failed to perform and document a hazardous waste determination for these wastes.

- C. The Respondent failed to notify the Office of Environmental Services in writing within thirty (30) days of generating industrial solid waste, in violation of LAC 33:VII.401.A. Specifically, the industrial solid waste generated by the facility's processes includes but is not limited to plant maintenance debris such as buckets and bags, and wastewater treatment sludge. At the time of the May 6, 2013 inspection, the Respondent was not registered as an Industrial Solid Waste generator. On or about September 27, 2013, the Respondent registered as an Industrial Solid Waste generator; therefore, this violation has been addressed.
- D. The Respondent failed to clearly mark or label an aboveground container used to store used oil with the words "Used Oil," in violation of LAC 33:V.4013.D.1. Specifically, during the May 6, 2013 inspection, the Department observed a tote in the drum crushing area, containing used oil that was not labeled. On or about July 19, 2017, the Respondent submitted documentation to the Department verifying the used oil tote is properly labeled. This violation has been addressed.
- E. The Respondent failed to mark containers containing hazardous waste with an accumulation start date, in violation of LAC 33:V.1109.E.1.c. Specifically, in the less than ninety (90) day hazardous waste storage area, the Department observed two (2) hazardous waste totes, carrying hazardous waste codes D001 and D002, which were not labeled with an accumulation start date. This violation was noted during the January 27, 2017 inspection. On or about July 19, 2017, a representative of the Respondent stated, in a telephone conversation, that the facility did not currently have any hazardous waste containers on-site. A response submitted to the Department on or about July 19, 2017 states that facility employees have been trained to label all hazardous waste containers with accumulation start dates.
- F. The Respondent failed to label containers of hazardous waste with the words "Hazardous Waste," in violation of LAC 33:V.1109.E.1.d. Specifically, in the less than ninety (90) day hazardous waste storage area, the Department observed two (2) hazardous waste totes, carrying hazardous waste codes D001 and D002, which were not labeled as hazardous waste. This violation was noted during the January 27, 2017 inspection. This violation was addressed as verified by a July 19, 2017 e-mail from a representative of the Respondent. On or about July 19, 2017, a representative of the

Respondent stated, in a telephone conversation, that the facility did not currently have any hazardous waste containers on-site. A response submitted to the Department on or about July 19, 2017 states that facility employees have been trained to label all hazardous waste containers with the facility's hazardous waste label. A photograph of the facility's hazardous waste label was provided in the Respondent's July 19, 2017 response.

- G. The Respondent failed to develop and retain on-site a waste minimization plan certified by a Louisiana registered professional engineer, as specified in LAC 33:V.2245.J. and LAC 33:V.2245.K, in violation of LAC 33:V.1109.E.1.e. Specifically, the facility's waste minimization plan was not certified by a Louisiana registered professional engineer. On or about February 2, 2017, the Respondent provided a copy of the certified waste minimization plan. This violation has been addressed.
- H. The Respondent failed to inspect areas where containers were stored, at least weekly, to determine if containers were leaking and if the containers or containment system had deteriorated, as specified in LAC 33:V.2109.A, in violation of LAC 33:V.1109.E.1.a.ii. Specifically, at the time of the January 27, 2017 inspection, the Respondent was conducting monthly inspections of hazardous waste containers. The Respondent is now conducting weekly inspections of hazardous waste containers as demonstrated in documentation provided to the Department on or about July 14, 2017; therefore, this violation has been addressed.
- I. The Respondent failed to apply to the administrative authority for an active EPA identification number within fourteen (14) days after generating any hazardous waste, in violation of LAC 33:V.1105.A. Specifically, at the time of the inspection, the facility failed to notify the Department as a generator of hazardous waste. The facility submitted an HW-1 Notification Form to the Department on or about May 17, 2013. This violation has been addressed.

COMPLIANCE ORDER

Based on the foregoing, the Respondent is **hereby ordered**:

I.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Louisiana Hazardous Waste and Solid Waste Regulations.

II.

To label or mark clearly, immediately upon receipt of this **COMPLIANCE ORDER**, all hazardous waste containers with an accumulation start date, in accordance with LAC 33:V.1109.E.1.c.

III.

To label or mark clearly, immediately upon receipt of this **COMPLIANCE ORDER**, all containers of hazardous waste with the words "Hazardous Waste," in accordance with LAC 33:V.1109.E.1.d.

IV.

To perform, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a hazardous waste determination on the wastes specified in Findings of the Fact Paragraph IV.B in accordance with LAC 33:V.1103. The results of the determination for the waste described in Findings of Fact Paragraph IV.B shall be submitted to the Enforcement Division within fifteen (15) days of receipt. All waste shall be disposed of in accordance with the Hazardous Waste or Solid Waste regulations, whichever is applicable.

V.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Adrienne Landry
Re: Enforcement Tracking No. MM-CN-17-00533
Agency Interest No. 42712

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. MM-CN-17-00533
Agency Interest No. 42712

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from

contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Adrienne Landry at (225) 219-3805 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross

revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

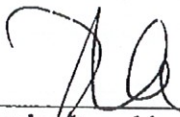
IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondent must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.


Baton Rouge, Louisiana, this 20th day of September, 2017.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Adrienne Landry

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE ENFORCEMENT DIVISION POST OFFICE BOX 4312 BATON ROUGE, LOUISIANA 70821-4312	CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE	
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Enforcement Tracking No.	MM-CN-17-00533	Contact Name	Adrienne Landry
Agency Interest (AI) No.	42712	Contact Phone No.	225-219-3805
Alternate ID No.	LAR000079301		
Respondent:	BALMAR LLC	Facility Name:	Balmar LLC
	c/o Kenny Oliver	Physical Location:	616 West Pont Des Mouton Road
	Agent for Service of Process		
	100 Rue Bastille	City, State, Zip:	Lafayette, LA 70507
	Lafayette, LA 70508	Parish:	Lafayette

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph V of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 45 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph IV of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

- The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:I.Subpart1.Chapter7.
- In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY MM-CN-17-00533, the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
- In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY MM-CN-17-00533, the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance.
 - Monetary component = \$ _____
 - Beneficial Environmental Project (BEP) component (optional)= \$ _____
 - **DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.**
- The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY MM-CN-17-00533 and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT

I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.

Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date
MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:		
Louisiana Department of Environmental Quality Office of Environmental Compliance Enforcement Division P.O. Box 4312 Baton Rouge, LA 70821 Attn: Adrienne Landry		