

**BOBBY JINDAL**  
GOVERNOR



**PEGGY M. HATCH**  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

December 21, 2011

CERTIFIED MAIL (7005 0390 0006 1028 1053)  
RETURN RECEIPT REQUESTED

**GEORGIA GULF LAKE CHARLES, LLC**

c/o Corporation Service Company  
Agent for Service of Process  
320 Somerulos Street  
Baton Rouge, Louisiana 70802-6129

**RE: AMENDED CONSOLIDATED COMPLIANCE ORDER &  
NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. AE-CN-10-00457A  
AGENCY INTEREST NO. 4013**

Dear Sir:

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

Any questions concerning this action should be directed to Amanda DeRouen Polito at 225.219.3093 or [amanda.polito@la.gov](mailto:amanda.polito@la.gov).

Sincerely,

Celena J. Cage  
Administrator  
Enforcement Division

CJC/APDP  
Alt ID No. 0520-00012  
Attachment



STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

<p>IN THE MATTER OF</p> <p>GEORGIA GULF LAKE CHARLES, LLC CALCASIEU PARISH ALT ID NO. 0520-00012</p> <p>PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT, La. R.S. 30:2001, ET SEQ.</p>	<p>* * * * * * * * * * *</p>	<p>ENFORCEMENT TRACKING NO.</p> <p>AE-CN-10-00457A</p> <p>AGENCY INTEREST NO.</p> <p>4013</p>
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**AMENDED CONSOLIDATED COMPLIANCE ORDER &  
NOTICE OF POTENTIAL PENALTY**

The Louisiana Department of Environmental Quality (the Department) hereby amends the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-10-00457** issued to **GEORGIA GULF LAKE CHARLES, LLC (RESPONDENT)** on September 29, 2010 in the above-captioned matter as follows:

I.

The Department hereby amends the Findings of Fact portion of AE-CN-10-00457 to remove paragraphs II.B, II.D, V.E, V.J, V.M, V.S, V.T, V.V, V.DD, V.EE, and V.MM in their entirety.

II.

The Department hereby amends paragraph II.C of the Finding of Fact portion of AE-CN-10-00457 to read as follows:

“The Respondent failed to initiate External Leak Detection Forms on February 16, 22, 23, and 26, 2006 when the vinyl chloride fixed point monitor AI-171 for the process area, Stream 5 detected concentrations of vinyl chloride greater than five (5) parts per million. Each failure to initiate an External Leak Detection Form is a violation of 40 CFR 61.65(b)(8)(i), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; LAC 33:III.501.C.4; LAC 33:III.905; and La. R.S. 30:2057(A)(2).”

III.

The Department hereby amends paragraph IV.B of the Finding of Fact portion of AE-CN-10-00457 to read as follows:

"The frequency of inspections and tests for Vessel C201 and S217 was not consistent with applicable manufacturers' recommendations and good engineering practices. Each failure to conduct inspections and tests consistent with applicable manufacturer's recommendations and good engineering practices is a violation of 40 CFR 68.73(d)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A; Specific Requirements 386 and 442 of Title V Permit No. 0520-00012-V1; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);"

IV.

The Department hereby amends paragraph V.C of the Finding of Fact portion of AE-CN-10-00457 to read as follows:

"According to a report dated November 18, 2005, the Respondent had an unexcused pH excursion at AIC-902A on May 17, 2005. This is a violation of 40 CFR 63.113(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; LAC 33:III.905; and La. R.S. 30:2057(A)(2);"

V.

The Department hereby amends paragraph V.P of the Finding of Fact portion of AE-CN-10-00457 to read as follows:

"According to a report dated December 28, 2006, excess emissions of EDC, vinyl chloride, ethylene, HCl, ethyl chloride were released to the atmosphere during restart of the thermal oxidizers on September 18, 2006, following a fire at R-201B. This release is in violation of Part 70 General Condition C of Title V Permit No. 0520-00012-V0, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);"

VI.

The Department hereby amends paragraph V.R of the Finding of Fact portion of AE-CN-10-00457 to read as follows:

"According to a report dated March 30, 2007, the Respondent exceeded its annual emission limit for chloroform during the 2006 calendar year from Process Equipment Fugitive Emissions (Source ID FE-1), or 0.06 tons per year, as set forth in Title V Permit No. 0520-00012-V0. The Respondent's failure to maintain emissions at a level less than or equal to that provided for in Title V Permit No. 0520-00012-V0 is a violation of Part 70 General Condition C of Title V Permit No. 0520-00012-V0, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);"

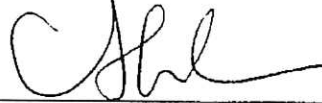
VII.

The Department incorporates all of the remainder of the original **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-10-00457** and **AGENCY INTEREST NO. 4013** as if reiterated herein.

VII.

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

Baton Rouge, Louisiana, this 21 day of December, 2011.



Cheryl Sonnier Nolan  
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  
Post Office Box 4312  
Baton Rouge, LA 70821-4312  
Attention: Amanda DeRouen Polito



BOBBY JINDAL  
GOVERNOR

PEGGY M. HATCH  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

September 29, 2010

CERTIFIED MAIL (7004 1160 0000 3797 0072)  
RETURN RECEIPT REQUESTED

**GEORGIA GULF CHEMICALS & VINYLs, LLC**  
c/o Corporation Service Company  
Agent for Service of Process  
320 Somerulos Street  
Baton Rouge, Louisiana 70802-6129

**RE: CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. AE-CN-09-0083  
AGENCY INTEREST NO. 2455**

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 **GEORGIA GULF CHEMICALS & VINYLs, 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 Chris Kotrlík at (225) 219-3752.

Sincerely,

A handwritten signature in black ink, appearing to read "Celena J. Cage".

Celena J. Cage  
Administrator  
Enforcement Division

CJC/CCK/ckk  
Alt ID No. 1280-00002  
Attachment



**STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE**

<b>IN THE MATTER OF</b>	*	
	*	
<b>GEORGIA GULF CHEMICALS &amp; VINYLs, LLC IBERVILLE PARISH ALT ID NO. 1280-00002</b>	*	<b>ENFORCEMENT TRACKING NO.</b>
	*	
	*	<b>AE-CN-09-0083</b>
	*	
	*	<b>AGENCY INTEREST NO.</b>
	*	
<b>PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT, La. R.S. 30:2001, ET SEQ.</b>	*	<b>2455</b>
	*	

**CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **GEORGIA GULF CHEMICALS & VINYLs, 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 the Plaquemine Facility, an industrial organic chemical manufacturing facility located at 26100 Highway 405 South in Plaquemine, Iberville Parish, Louisiana. The Plaquemine Facility operates pursuant to various Title V Operating Permits, including Title V Permit No. 2030-V0, issued on September 20, 2005, for the Chlorine Caustic Plant; Title V Permit No. 2224-V1, issued on February 22, 2006, for the VCM Incinerators; Title V Permit No. 2906-V2, issued on August 3, 2007, for the EDC/VCM Plant; Title V Permit No. 2056-V0, issued on August 8, 2005, for the Cogeneration Plant; Title V Permit No. 1267-V1, issued on April 23, 2009, for the Phenol Acetone Plant; Title V Permit No. 881-V3, issued on June 22, 2010, for the PVC Plant; and Title V Permit No. 2907-V1, issued on February 20, 2009, for the Utilities/Wastewater Plant.

## II.

On or about February 5, 2009, and July 21, 2010, an inspection and file review, respectively, of the Respondent's facility were performed to determine the degree of compliance with the Act and the Air Quality Regulations. While the Department's investigation is not yet complete, the following violations were noted during the course of the inspection and file review:

- A. According to a report dated January 17, 2008, a preventable release of approximately 2.13 pounds of vinyl chloride occurred on January 14, 2008, due to operator error. This release is a violation of LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- B. According to a report dated December 28, 2007, a release of approximately 4,126 pounds of vinyl chloride, 2,358 pounds of hydrogen chloride, and 707 pounds of 1,2-dichloroethane (EDC) occurred on December 26, 2007, from a leak in, "A spacer in a 2-inch line in the VCM Unit's Adsorber area..." This release is a violation of LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- C. According to a report dated February 14, 2008, a release of approximately 414.05 pounds of 1,2-dichloroethane (EDC) occurred on February 9, 2008, from, "a leak from a 30" overhead line of an EDC reactor." This release is a violation of LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- D. According to a report dated January 20, 2009, a preventable release of approximately 4,586 pounds of sodium hydroxide occurred on January 14, 2009, from an open drain valve on the Chlorine Disposal Tower. This release is a violation of LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- E. According to reports dated November 3, 2006; May 2, 2007; November 5, 2007; May 6, 2008; November 6, 2008; May 5, 2009; November 5, 2009; and May 13, 2010; the Respondent bypassed the Regenerative Thermal Oxidizer (EQT086) during the periods indicated in the following table:

Begin		End		Duration (hours)
Date	Time	Date	Time	
6/30/2006	unknown	6/30/2006	unknown	
9/21/2006	22:51	9/22/2006	05:20	6.48
10/5/2006	14:11	10/5/2006	15:49	1.63
10/5/2006	18:32	10/5/2006	20:22	1.83
10/5/2006	21:37	10/6/2006	00:35	2.97
11/29/2006	13:32	11/29/2006	16:04	2.53
1/11/2007	09:20	1/11/2007	13:45	4.42
1/12/2007	02:50	1/12/2007	08:49	5.98
2/24/2007	06:46	2/24/2007	07:07	0.35
3/11/2007	22:38	3/12/2007	00:34	1.93

Begin		End		Duration (hours)
Date	Time	Date	Time	
6/3/2007	01:06	6/3/2007	08:35	7.48
6/20/2007	11:00	6/20/2007	11:12	0.20
6/21/2007	15:25	6/21/2007	15:44	0.32
7/16/2007	16:40	7/16/2007	17:09	0.48
8/9/2007	13:01	8/9/2007	13:01	< 1 minute
8/28/2007	18:23	8/28/2007	18:49	0.43
9/1/2007	19:46	9/1/2007	19:46	< 1 minute
9/7/2007	19:05	9/7/2007	20:44	1.65
9/11/2007	15:12	9/11/2007	16:08	0.93
9/12/2007	21:30	9/12/2007	21:37	0.12
9/25/2007	00:21	9/25/2007	00:26	0.08
9/27/2007	16:04	9/27/2007	16:15	0.18
2/20/2008	16:33	2/20/2008	21:42	5.15
9/1/2008	12:22	9/1/2008	19:32	7.17
12/9/2008	16:35	12/9/2008	19:45	3.17
2/10/2009	02:26	2/10/2009	03:02	0.60
2/18/2009	09:33	2/18/2009	22:52	0.98
3/27/2009	16:38	3/28/2009	00:46	8.20
5/4/2009	02:42	5/4/2009	03:45	1.05
9/30/2009	23:58	10/1/2009	08:43	8.75
1/8/2010	10:52	1/8/2010	11:18	0.43
1/9/2010	02:29	1/9/2010	02:50	0.35

EQT086 is used as a control device for Air Oxidation Reactors (EQT091), Cleavage Reactor (EQT092), Distillation Operations (EQT093), Heavy Oil Tanks 02-47519 and 02-47520 (EQT094), Phenol Product Rundown Tanks 02-47515 and 02-47516 (EQT095), Heavy Ends Tower Feed Tank 02-47514 (EQT096), Cumene Tower Feed Tank 02-47529 (EQT097), Hydrocarbon Feed Tank 02-47511 (EQT098), Recycle Cumene Tank 02-47525 (EQT099), Cleavage Product Surge Tank 02-47537 (EQT100), No. 2 Oxidation Surge Tank 02-47522 (EQT101), HET Feed Tank (EQT102), Phenol Stripper Feed Tank 02-42710 (EQT103), Oxidation Surge Tank 02-47521 (EQT104), AMS Utility Tank 02-47535 (EQT105), Phenol Light Oil Storage Tank 02-47535 (EQT106), AMS Storage Tank 02-47524 (EQT107), AMS Days Tanks 02-47530 and 02-47531 (EQT108), Acetone Rundown Tanks 02-47512 and 02-47513 (EQT109), Recycle Acetone Tank (EQT110), and Phenol Heavy Mixed Oils Loading (EQT176). Each bypass of EQT086 that resulted in a failure to control emissions as specified in Title V Permit No. 1267-V0 is a violation of Specific Requirements 14, 15, 26, 32, 35, 37, 43, 48, 50, 57, 62, 64, 70, 73, 76, 78, 80, 95, and 101 of Title V Permit No. 1267-V0 or Specific Requirements 9, 34, 37, 40, 44, 51, 54, 56, 58, 60, 62, 65, 68, 70, 72, 74, and 79 of Title V Permit



No. 1267-V1; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.2103.E.1; LAC 33:III.2115.A; LAC 33:III.5109.A; 40 CFR 60.612(a), 40 CFR 60.662(a), and 40 CFR 60.702(a), which language has been adopted as a Louisiana regulation in LAC 33:III.3003; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; La. R.S. 30:2057(A)(1); and 30:2057(A)(2).

### III.

On or about August 11, 2010, a file review of the Respondent's facility was performed to determine the degree of compliance with the Act and the Air Quality Regulations. While the Department's investigation is not yet complete, the following violations were noted during the course of the file review:

- A. According to reports dated January 28, 2005; July 26, 2005; January 30, 2006; July 28, 2006; January 31, 2007; July 31, 2007; January 29, 2008; July 30, 2008; January 29, 2009; July 23, 2009; January 27, 2010; and July 26, 2010, the Respondent failed to timely repair pumps in accordance with 40 CFR 63.163(c) as indicated in the table below:

Date of Report	Number of Pumps
January 28, 2005	6
July 26, 2005	2
January 30, 2006	13
July 28, 2006	4
January 31, 2007	13
July 31, 2007	2
January 29, 2008	1
July 30, 2008	16
January 29, 2009	2
July 23, 2009	19
January 27, 2010	4
July 26, 2010	1

Each failure to make a timely repair is a violation of 40 CFR 63.163(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 2 of Air Permit No. 881 (M-2), Specific Requirement 92 of Title V Permit No. 881-V2, Specific Condition 2 of Air Permit No. 1267 (M-5), Specific Requirement 113 of Title V Permit No. 1267-V0, Specific Requirement 85 of Title V Permit No. 1267-V1, Specific Requirement 113 of Title V Permit No. 2906-V1, or Specific Requirement 44 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);

- B. According to reports dated January 28, 2005; July 26, 2005; January 30, 2006; July 28, 2006; January 31, 2007; July 31, 2007; January 29, 2008; July 30, 2008; January 29, 2009; July 23, 2009; January 27, 2010; and July 26, 2010, the Respondent failed to repair valves in accordance with 40 CFR 63.168(f) as indicated in the table below:

Date of Report	Number of Valves
January 28, 2005	5
July 26, 2005	6
January 30, 2006	12
July 28, 2006	22
January 31, 2007	16
July 31, 2007	22
January 29, 2008	6
July 30, 2008	5
January 29, 2009	11
July 23, 2009	7
January 27, 2010	6
July 26, 2010	5

Each failure to make a timely repair is a violation of 40 CFR 63.168(f), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 2 of Air Permit No. 881 (M-2), Specific Requirement 124 of Title V Permit No. 881-V2, Specific Condition 2 of Air Permit No. 1267 (M-5), Specific Requirement 145 of Title V Permit No. 1267-V0, Specific Requirement 117 of Title V Permit No. 1267-V1, Specific Requirement 121 of Title V Permit No. 2906-V0, Specific Requirement 144 of Title V Permit No. 2906-V1, or Specific Requirement 75 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);

- C. According to reports dated January 28, 2005; July 26, 2005; January 30, 2006; July 28, 2006; January 31, 2007; January 29, 2008; July 30, 2008; January 29, 2009; July 23, 2009; January 27, 2010; and July 26, 2010, the Respondent failed to repair connectors in accordance with 40 CFR 63.174(d) as indicated in the table below:

Date of Report	Number of Connectors
January 28, 2005	2
July 26, 2005	2
January 30, 2006	2
July 28, 2006	1
January 31, 2007	3
January 29, 2008	3
July 30, 2008	4
January 29, 2009	18
July 23, 2009	18

Date of Report	Number of Connectors
January 27, 2010	11
July 26, 2010	11

Each failure to make a timely repair is a violation of 40 CFR 63.174(d), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 2 of Air Permit No. 881 (M-2), Specific Requirement 166 of Title V Permit No. 881-V2, Specific Condition 2 of Air Permit No. 1267 (M-5), Specific Requirement 161 of Title V Permit No. 1267-V0, Specific Requirement 133 of Title V Permit No. 1267-V1, Specific Requirement 136 of Title V Permit No. 2906-V0, Specific Requirement 159 of Title V Permit No. 2906-V1, or Specific Requirement 90 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);

- D. According to reports dated July 28, 2006, and July 31, 2007, the Respondent failed to repair compressors as required by 40 CFR 63.164(g) as indicated in the table below:

Date of Report	Number of Compressors
July 28, 2006	1
July 31, 2007	1

Each failure to make a timely repair is a violation of 40 CFR 63.164(g), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 131 of Title V Permit No. 2906-V1; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);

- E. According to reports dated July 31, 2007; January 29, 2008; and January 29, 2009, the Respondent failed to repair agitators as required by 40 CFR 63.173(c) as indicated in the table below:

Date of Report	Number of Agitators
July 31, 2007	1
January 29, 2008	1
January 29, 2009	1

Each failure to make a timely repair is a violation of 40 CFR 63.173(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 147 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);

- F. According to a report dated January 28, 2005, the Respondent failed to repair two (2) connectors in the PVC Plant within 15 days after a leak was detected. This is a violation of Paragraph O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks; Part 70 Specific Condition 4 of Title V Permit No. 881-V0, LAC 33:III.501.C.4, LAC 33:III.5109.A, and La. R.S. 30:2057(A)(2);

- G. According to a report dated March 10, 2005, "The three-hour rolling average limit of 10 ppm vinyl chloride was exceeded on the Gaseous Incinerator #2 (IN-663) on February 22, 2005 at 2306 with a reading of 124 ppm." This is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 9 of Title V Permit No. 2224-V0; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- H. According to a report dated March 10, 2005, "Industrial furnace carbon monoxide calibration check was out of range on December 5, 2004. The analyzer was not recalibrated within 24 hours." This is a violation of Part 70 Specific Condition 3.A of Title V Permit No. 2224-V0, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- I. According to a report dated March 10, 2005, "The Incineration stack analyzer was out of service from 2229 on February 2 to 0806 on February 3, 2005 while burning liquids in the Industrial Furnace." This is a violation of 40 CFR 61.68(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Part 70 Specific Condition 3 of Title V Permit No. 2224-V0, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- J. According to a report dated June 10, 2005, "The three-hour rolling average limit of 10 ppm vinyl chloride was exceeded on the Industrial Furnace (IN-662) on March 10, 2005 from 0526-1311 with five consecutive readings above 20 ppm from 0711 to 0811. The furnace was not operating at the time." The failure to control emissions as specified in Title V Permit No. 2224-V0 is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Part 70 General Condition C of Title V Permit No. 2224-V0; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- K. According to a report dated June 10, 2005, the three-hour rolling average limit of 10 ppm vinyl chloride was, "exceeded on Gaseous Incinerator #1 (IN-661) on April 12, 2005 at 2043 with a reading of 143 ppm and on Gaseous Incinerator #2 (IN-663) on May 10, 2005 at 1032 with a reading of 374 ppm." Each failure to control emissions as specified in Title V Permit No. 2224-V0 is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 9 of Title V Permit No. 2224-V0; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);

- L. According to a report dated September 15, 2005, reactor opening losses for Reactor 2 exceeded 0.02 gram of vinyl chloride per kilogram of polyvinyl chlorine product on June 17, 2005. This is a violation of 40 CFR 61.64(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Specific Requirement 17 of Title V Permit No. 881-V1, LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- M. According to a report dated September 15, 2005, "The sample valve for the incineration stack monitor did not work from 0641 to 1140 on July 18, 2005. Dust had contaminated the air supply which actuates the sample valve, causing the failure." This is a violation of 40 CFR 61.68(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.114(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Part 70 Specific Condition 3 of Title V Permit No. 2224-V0, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- N. According to a report dated September 15, 2005, "The sample valve for one of the area monitoring systems (AT-5098) did not work from 0647 to 1058 on July 18, 2005." This is a violation of 40 CFR 61.65(b)(8)(i), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Specific Requirement 119 of Title V Permit No. 881-V1; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- O. According to a report dated September 15, 2005, "action points [in the Respondent's vinyl chloride Leak Detection and Elimination plan] were defined as a single reading of 5 ppm or any single sampling point reading above 1 ppm for three consecutive readings with defined follow-up actions to be taken. It has recently been discovered that the system in place does not record or document any three consecutive readings over 1 ppm, nor does it require any action to be taken to acknowledge these readings." The failure to comply with the facility's Leak Detection and Elimination plan is a violation of 40 CFR 61.65(b)(8)(i), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; LAC 33:III.905; and La. R.S. 30:2057(A)(2);
- P. According to a report dated December 15, 2005, "The three-hour rolling average limit of 10 ppm vinyl chloride was exceeded on Gaseous Incinerator #1 (IN-661) on September 2, 2005 from 1723 to 1840 and on Gaseous Incinerator #2 (IN-663) on September 26, 2005 from 1124 to 1509 and on November 26, 2005 at 0855." Each failure to control emissions as specified in Title V Permit No. 2224-V0 is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 9 of Title V Permit No. 2224-V0; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);

- Q. According to a report dated December 15, 2005, "pH on the gas absorber exceeded permit limits beginning at 1000 hours on September 9, 2005. Vents were not removed until 1030, fifteen minutes past the required time." The failure to operate the control device in accordance with Title V Permit No. 2224-V0 is a violation of Specific Condition 9 of Title V Permit No. 2224-V0, LAC 33:III.501.C.4, LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2). The failure to take corrective action when the pH was out of range for a continuous 15 minute averaging period is a violation of Specific Condition 10 of Title V Permit No. 2224-V0, LAC 33:III.501.C.4, LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- R. According to a report dated December 15, 2005, the Respondent had three (3) accidental releases of vinyl chloride during the period encompassing September 26 through October 16, 2005, due to, "Piping corrosion." Approximately 390.43 pounds of vinyl chloride was released as a result of these three (3) releases. Each unauthorized discharge of vinyl chloride is a violation of LAC 33:III.501.C.2, LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- S. According to a report dated March 3, 2006, the Respondent bypassed the Regenerative Thermal Oxidizer (EQT086) from 13:53 on February 24, 2006, until 02:45 on March 2, 2006. This bypass caused 40.4 pounds of benzene, 77.4 pounds of methanol, and 585.4 pounds of cumene to be released to the atmosphere. The failure to control emissions as specified in Title V Permit No. 1267-V0 is a violation of Specific Requirements 14, 15, 26, 32, 35, 37, 43, 48, 50, 57, 62, 64, 70, 73, 76, 78, 80, 95, and 101 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.2103.E.1; LAC 33:III.2115.A; LAC 33:III.5109.A; 40 CFR 60.612(a), 40 CFR 60.662(a), and 40 CFR 60.702(a), which language has been adopted as a Louisiana regulation in LAC 33:III.3003; and 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122;
- T. According to a report dated June 13, 2006, the vinyl chloride continuous emission monitor (CEM) for the VCM incinerators, "was not working the night of March 28-29, 2006 but was repaired March 29." The failure to continuously monitor vinyl chloride is a violation of 40 CFR 61.68(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Part 70 Specific Condition 3 of Title V Permit No. 2224-V1, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- U. According to a report dated December 13, 2006, "The three-hour rolling average limit of 10 ppm vinyl chloride was exceeded on Gaseous Incinerator #1 (IN-661) on September 9, 2006 beginning at 0049 hours and on Gaseous Incinerator #2 (IN-663) on September 18, 2006 beginning at 0009 hours (unknown cause;

- the incinerator was out of service at the time) and on October 29, 2006 beginning at 1408 hours.” Each failure to control emissions as specified in Title V Permit No. 2224-V1 is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 9 of Title V Permit No. 2224-V1; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- V. According to a report dated December 14, 2006, “On July 10, 2006, monitoring following repair of leaking seals on [pumps P-604A and P-604B] located in the VCM plant...was conducted fourteen days late.” Each failure to perform verification monitoring is a violation of 40 CFR 63.163(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 113 of Title V Permit No. 2906-V1; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- W. According to a report dated March 7, 2007, the Respondent cannot find weekly visual inspection log sheets for two (2) pumps in the VCM Plant for the weeks of June 24 and July 1, 2006. Additionally, the Respondent could not find log sheets for pumps in the “B” Area of the VCM Plant for the weeks of July 15 and July 22, 2006. Each failure to document that a weekly visual inspection was conducted and the date of the inspection is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 161 of Title V Permit No. 2906-V1; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2). Each failure to perform a weekly visual inspection is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 112 of Title V Permit No. 2906-V1; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- X. According to a report dated March 7, 2007, the Respondent failed to monitor Pump 02-46166 after a repair attempt to verify that emissions from the pump were below the applicable leak definition. Specifically, Pump 02-46166 was placed back in service on August 3, 2006, after a repair attempt. However, verification monitoring was not conducted until February 26, 2007. The failure to timely perform verification monitoring is a violation of 40 CFR 63.163(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 113 of Title V Permit No. 2906-V1; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- Y. According to a report dated March 7, 2007, the Respondent cannot find weekly visual inspection log sheets for pumps in the Phenol Acetone Plant for the week of August 26, 2006. Each failure to document that a weekly visual inspection was conducted and the date of the inspection is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122;

- and La. R.S. 30:2057(A)(2). The failure to perform a weekly visual inspection is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 112 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- Z. According to a report dated March 15, 2007, a preventable release of less than one (1) pound of vinyl chloride occurred on February 11, 2007, from an open reactor. The failure to vent the vinyl chloride through a control system is a violation of 40 CFR 61.65(b)(5), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Specific Requirement 256 of Title V Permit No. 881-V2; LAC 33:III.501.C.2; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- AA. According to a report dated May 30, 2007, a preventable release of approximately 0.32 pounds of vinyl chloride occurred on May 23, 2007, from a pressure relief device in the PVC Plant. This non-emergency relief valve discharge is a violation of 40 CFR 61.65(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Specific Requirement 254 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- BB. According to a report dated June 13, 2007, approximately 5.43 pounds of vinyl chloride was released from a, "Pin hole leak in a nozzle on the bottom of [VCM Weigh Tank #2]," on April 8, 2007. This is a violation of 40 CFR 61.64(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Specific Requirement 251 of Title V Permit No. 881-V2; LAC 33:III.501.C.2; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- CC. According to a report dated September 12, 2007, approximately 25.1 pounds of vinyl chloride was released on August 5, 2007, from a, "Discharge line from recovery system to condensers," due to erosion. This is a violation of 40 CFR 61.64(e)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; LAC 33:III.501.C.2; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- DD. According to a report dated November 5, 2007, approximately 17,111 pounds of ethylene (9,777 pounds per hour) was released from the OXY Hydrochlorination Unit Scrubber (EQT0187) on October 30, 2007, after the ethylene compressor overpressured due to unknown causes. This release exceeded the maximum permitted emission rate of ethylene from EQT0187, or 2,500 pounds per hour, as set forth in Title V Permit No. 2906-V2. This is a violation of Part 70 General Condition C of Title V Permit No. 2906-V2, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1); and 30:2057(A)(2);



- EE. According to a report dated November 20, 2007, approximately 22.4 pounds of vinyl chloride was released on November 19, 2007, from a pressure relief device in the VCM Plant. This non-emergency relief valve discharge is a violation of 40 CFR 61.65(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- FF. According to a report dated March 10, 2008, the Respondent discovered one (1) open-ended line in the Phenol Acetone Plant on December 5, 2007. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 140 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- GG. According to a report dated March 10, 2008, "One component, valve 36849, was found to be misidentified as a heavy liquid component that does not require routine monitoring, but is actually in vapor service requiring quarterly monitoring." Valve 36849 was monitored on March 3, 2008. The previous monitoring event for Valve 36849 was on May 24, 2005. Each missed quarterly monitoring event is a violation of 40 CFR 63.168(b), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 142 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- HH. According to a report dated March 10, 2008, "Several pump seal leak checks were not documented," in the Phenol Acetone Plant for the weeks of July 13, July 27, and August 3, 2007, and for the month of October 2007. Each failure to document that a weekly visual inspection was conducted and the date of the inspection is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2). Each failure to perform a weekly visual inspection is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 112 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- II. According to a report dated March 10, 2008, "Several pump seal leak checks were not documented," in the PVC Plant for the weeks of September 25 and December 9, 2007. Each failure to document that a weekly visual inspection was conducted and the date of the inspection is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2). Each failure to perform a weekly visual inspection is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 91 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- JJ. According to a report dated March 10, 2008, "Several pump seal leak checks were not documented," in the VCM Plant during the months of October, November, and December 2007. Each failure to document that a weekly visual inspection

- was conducted and the date of the inspection is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 92 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2). Each failure to perform a weekly visual inspection is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 43 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- KK. According to a report dated March 10, 2008, the Respondent misplaced the Regenerative Thermal Oxidizer vent valve inspection log sheets for the month of October 2007. The failure to keep these records is a violation of 40 CFR 63.118(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- LL. According to a report dated March 10, 2008, the Respondent reported that initials were missing for the Regenerative Thermal Oxidizer Vent Valve Environmental Log for November 30, 2007. This is a violation of 40 CFR 63.181(d)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- MM. According to a report dated March 10, 2008, the Respondent misplaced the car seal valve inspection check sheets for May, July, October, and November 2007. The failure to keep these records is a violation of 40 CFR 63.118(a)(4), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- NN. According to a report dated March 11, 2008, approximately 2.13 pounds of vinyl chloride was released from a, "Washout Tank Relief Valve," on January 14, 2008, due to an incorrect pressure indicator range. This release is in violation of 40 CFR 61.65(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; LAC 33:III.501.C.2; LAC 33:III.905; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- OO. According to a report dated June 6, 2008, the Respondent discovered one (1) open-ended line in the PVC Plant on January 14, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 117 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- PP. According to a report dated June 6, 2008, the Respondent discovered two (2) open-ended lines in the VCM Plant on February 25, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 70 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);

- QQ. According to a report dated June 6, 2008, the Respondent discovered three (3) open-ended lines in the Phenol Acetone Plant on March 10, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 140 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- RR. According to a report dated June 6, 2008, the Respondent discovered one (1) open-ended line in the Phenol Acetone Plant on March 17, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 140 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- SS. According to a report dated June 6, 2008, the Respondent discovered one (1) open-ended line in the Phenol Acetone Plant on March 18, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 140 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- TT. According to a report dated June 6, 2008, the Respondent discovered one (1) open-ended line in the Phenol Acetone Plant on March 26, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 140 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- UU. According to a report dated June 6, 2008, the Respondent missed 148 monitoring events of fugitive emission components during the period encompassing January 2007 through March 2008. These components were associated with neutralizers in the VCM Plant. Each missed monitoring event is a violation of 40 CFR 63 Subpart H, which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 78 of Title V Permit No. 2906-V1 or Specific Requirement 95 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- VV. According to a report dated June 6, 2008, the Respondent failed to perform weekly inspections on two (2) pumps in the VCM Plant during the weeks of January 7 and January 14, 2008. Each missed monitoring event is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 43 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- WW. According to a report dated June 6, 2008, the Respondent does not have HNU Meter calibration records for the months of February and March 2008. This is a violation of 40 CFR 63.103(c)(2)(iii), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- XX. According to a report dated September 15, 2008, the Respondent discovered two (2) open-ended lines in the PVC Plant on April 2, 2008. Each open-ended

- line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 117 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; LAC 33:III.5109; and La. R.S. 30:2057(A)(2);
- YY. According to a report dated September 15, 2008, the Respondent discovered one (1) open-ended line in the PVC Plant on April 22, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 117 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- ZZ. According to a report dated September 15, 2008, the Respondent discovered one (1) open-ended line in the VCM Plant on April 23, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 70 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- AAA. According to a report dated September 15, 2008, the Respondent failed to perform weekly inspections on two (2) agitators in the PVC Plant from October 2007 through July 2008. Each missed monitoring event is a violation of 40 CFR 63.173(b)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 146 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- BBB. According to a report dated September 15, 2008, the Respondent failed to monitor two (2) pumps in the VCM Plant from January 2008 through mid-July 2008. Each missed monitoring event is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 43 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- CCC. According to a report dated September 15, 2008, the Respondent failed to monitor four (4) pumps in the Phenol Acetone Plant during the week of June 11, 2008. Each missed monitoring event is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 112 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- DDD. According to a report dated September 15, 2008, the Respondent does not have HNU Meter calibration records for the month of April 2008. This is a violation of 40 CFR 63.103(c)(2)(iii), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- EEE. According to a report dated December 3, 2008, the Respondent failed to monitor two (2) agitators in the PVC Plant during the month of August 2008. Each missed

- monitoring event is a violation of 40 CFR 63.173(b)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 146 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- FFF. According to a report dated December 3, 2008, the Respondent failed to keep repair records for a valve in the PVC Plant. This is a violation of 40 CFR 63.181(d), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 173 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- GGG. According to a report dated December 3, 2008, "On August 19, 2008 two components [in the Phenol Acetone Plant] were monitored within six seconds of each other which is not in accordance with Method 21 [of 40 CFR part 60, appendix A]." This is a violation of 40 CFR 63.180(b)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 162 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- HHH. According to a report dated March 3, 2009, the Respondent discovered one (1) open-ended line in the PVC Plant on October 13, 2008. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 117 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- III. According to a report dated March 3, 2009, the Respondent cannot find one (1) page of the August 15, 2008, pump inspection check sheet for the VCM Plant. This is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 92 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- JJJ. According to a reported dated March 3, 2009, the Respondent failed to monitor one (1) pump in the VCM Plant during the week of August 22, 2008. This is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 43 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- KKK. According to a reported dated March 3, 2009, the Respondent failed to monitor one (1) pump in the VCM Plant during the week of October 10, 2008. This is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 43 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);

- LLL. According to a report dated March 3, 2009, the Respondent cannot find one (1) page of the August 27, 2008, pump inspection check sheet for the Phenol Acetone Plant. This is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- MMM. According to a report date March 3, 2009, "Some of the pumps on the weekly checklist [in the Phenol Acetone Plant] were not monitored the week of December 21, 2008." Each missed monitoring event is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 112 of Title V Permit No. 1267-V0; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- NNN. According to a report dated March 3, 2009, the Respondent failed to monitor one (1) pump in the maintenance area during the month of December 2008. This is a violation of 40 CFR 63.163(b)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- OOO. According to a report dated March 3, 2009, the Respondent failed to monitor two (2) agitators in the maintenance area during the month of December 2008. This is a violation of 40 CFR 63.173(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- PPP. According to a report dated March 3, 2009, the Respondent failed to monitor five (5) valves in the maintenance area during the month of December 2008. This is a violation of 40 CFR 63.168(b), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- QQQ. According to a report dated March 3, 2009, the Respondent failed to calibrate the HNU meter in the VCM Plant during the month of November 2008. This is a violation of 40 CFR 63.114(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- RRR. According to a report dated March 3, 2009, the Respondent exceeded the 25 ppmv NO<sub>x</sub> limit for its Cogeneration Plant, as set forth in Air Permit No. PSD-LA-592, on December 13, 2008. This is a violation of Specific Condition 3 of Air Permit No. PSD-LA-592; Specific Requirement 200 of Title V Permit No. 2056-V0; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- SSS. According to a report dated March 11, 2009, "The three-hour rolling average limit of 10 ppm vinyl chloride was exceeded at 0522 hours on January 14, 2009 during start-up of IN-663." The failure to control emissions as specified in Title V Permit No. 2224-V1 is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 9 of Title V Permit No. 2224-V1; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);

- TTT. According to a report dated March 11, 2009, approximately 887 pounds of vinyl chloride was released when an, "Inlet valve failed to close causing [VCM Weigh Tank 2] to overflow," on January 16, 2009. This is a violation of 40 CFR 61.64(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Specific Requirement 251 of Title V Permit No. 881-V2; LAC 33:III.501.C.2; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- UUU. According to a report dated June 3, 2009, the Respondent discovered two (2) open-ended lines in the VCM Plant on February 4, 2009. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 70 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- VVV. According to a report dated June 3, 2009, the Respondent cannot find one (1) page of the January 27, 2009, pump inspection check sheet for the Phenol Acetone Plant. This is a violation of 40 CFR 63.181(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- WWW. According to a report dated June 3, 2009, "It was recently discovered that a valve [in the Phenol Acetone Plant] was inadvertently omitted from the RTO vent valve check sheet." Each missed monitoring event is a violation of 40 CFR 63.172(j), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- XXX. According to a report dated June 3, 2009, the Respondent failed to calibrate the HNU meter in the VCM Plant during the week of January 5, 2009. This is a violation of 40 CFR 63.114(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- YYY. According to a report dated June 3, 2009, the Respondent failed to conduct HON cooling tower sampling for the first, third, and fourth quarters of 2008. Each missed monitoring event is a violation of 40 CFR 63.104(b), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; and La. R.S. 30:2057(A)(2);
- ZZZ. According to a report dated June 9, 2009, approximately 87 pounds of vinyl chloride was released from a pressure relief device on May 4, 2009, when a, "rupture disc failed prematurely and an excess flow check valve was missing." This is a violation of 40 CFR 61.65(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Specific Requirement 254 of Title V Permit No. 881-V2; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);

- AAAA. According to a report dated September 14, 2009, the vinyl chloride continuous emission monitor (CEM) for the VCM incinerators, "failed functioning from 1900 hours on Friday, June 12, 2009 until 1715 hours on Monday, June 15, 2009." The failure to continuously monitor vinyl chloride is a violation of 40 CFR 61.68(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Part 70 Specific Condition 3 of Title V Permit No. 2224-V1, LAC 33:II.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- BBBB. According to a report dated September 14, 2009, approximately 3,629 pounds of vinyl chloride was released from H-401A due to valve failure which resulted in loss of containment and fire. This unpermitted release is a violation of LAC 33:III.501.C.2, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- CCCC. According to a report dated September 29, 2009, the Respondent failed to monitor one (1) pump in the Phenol Acetone Plant during the week of June 10, 2009. This is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 84 of Title V Permit No. 1267-V1; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- DDDD. According to a report dated September 29, 2009, the Respondent failed to monitor one (1) pump in the Phenol Acetone Plant during the week of June 17, 2009. This is a violation of 40 CFR 63.163(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 84 of Title V Permit No. 1267-V1; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- EEEE. According to a report dated September 29, 2009, "It was recently discovered that not all of the LDAR components associated with [the VCM and PVC Plants'] closed vent systems had been identified and monitored." The failure to identify each piece of equipment in a process unit to which 40 CFR 63 Subpart H applies such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H is a violation of 40 CFR 63.162(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 88 of Title V Permit No. 881-V2; Specific Requirement 40 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- FFFF. According to a report dated December 3, 2009, "Data was not entered on the Daily RTO & Off-gas Vent Environmental Log for the 0400-0500 hour on 9/14/2009." This is a violation of 40 CFR 63.118(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- GGGG. According to a report dated December 8, 2009, "The three-hour rolling average limit of 10 ppm vinyl chloride was exceeded from 1312 to 1318 on October 28,



2009 during the unexpected shutdown and restart of IN-662.” The failure to control emissions as specified in Title V Permit No. 2224-V1 is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Condition 9 of Title V Permit No. 2224-V1; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);

- HHHH. According to a report dated December 8, 2009, the vinyl chloride continuous emission monitor (CEM) for the VCM incinerators, “was out of service for repairs from 1103 hours on November 23, 2009 until 1120 hours on November 24, 2009. The failure to continuously monitor vinyl chloride is a violation of 40 CFR 61.68(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Part 70 Specific Condition 3 of Title V Permit No. 2224-V1, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- III. According to a report dated March 12, 2010, “the [incineration stack] monitor failed on 2205 hours on Saturday, January 2, 2010 until Friday, January 8, 2010.” This is a violation of 40 CFR 61.68(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Part 70 Specific Condition 3 of Title V Permit No. 2224-V1, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- JJJJ. According to a report dated March 12, 2010, a release of approximately 11,664 pounds of vinyl chloride occurred from the VCM Product Still Relief Valves when, “A faulty pressure transmitter caused the Product Still to overpressure.” This is a violation of 40 CFR 61.65(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; LAC 33:III.501.C.2; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);
- KKKK. According to a report dated March 15, 2010, the Respondent failed to monitor a pump in the VCM Plant in December 2009 after a repair attempt to verify that emissions from the pump were below the applicable leak definition. The failure to timely perform verification monitoring is a violation of 40 CFR 63.163(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 44 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- LLLL. According to a report dated March 15, 2010, “The incineration stack monitor failed functioning about 0513 on December 12, 2009. Burning of heavy ends was not stopped until 1720 on December 12, 2009.” This is a violation of 40 CFR 61.68(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; Part 70 Specific Condition 3 of Title V Permit No. 2224-V1, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);

- MMMM. According to a report dated March 15, 2010, the Respondent failed to calibrate the HNU meter in the VCM Plant during the weeks of December 21 and December 28, 2009. This is a violation of 40 CFR 63.114(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- NNNN. According to a report dated March 15, 2010, "A test of the asbestos scrubber [in the Chlorine Caustic Plant] indicated that emissions exceeded previous estimates upon which the permit limits were based." A review of the Title V Renewal Application dated March 19, 2010, reveals that the Respondent is requesting to increase the maximum emission limit for asbestos from 0.0039 pounds per hour to 0.01 pounds per hour, and the annual emission limit from 0.0005 tons per year to 0.007 tons per year. The failure to maintain emissions at a level less than or equal to that provided for in Title V Permit No. 2030-V0 is a violation of Part 70 General Condition C of Title V Permit No. 2030-V0, LAC 33:III.501.C.4, LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2);
- OOOO. According to a report dated May 27, 2010, the Respondent discovered 12 open-ended lines in the VCM Plant on February 24, 2010. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 70 of Title V Permit No. 2906-V2; LAC 33:III.501.C.4; LAC 33:III.5109.A; and La. R.S. 30:2057(A)(2);
- PPPP. According to a report dated May 27, 2010, the Respondent discovered 32 open-ended lines in the Phenol Acetone Plant on February 25, 2010. Each open-ended line is a violation of 40 CFR 63.167(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Specific Requirement 112 of Title V Permit No. 1267-V1; LAC 33:III.501.C.4; and La. R.S. 30:2057(A)(2);
- QQQQ. According to a report dated May 27, 2010, "Recirculation flow indication failed on the top section of gaseous incinerator IN-663 at 1248 on January 14, 2010.... IN-663 was taken out of service at 0800 on January 15, 2010." This is a violation of 40 CFR 63.114(d), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; and La. R.S. 30:2057(A)(2);
- RRRR. According to a report dated May 27, 2010, "It was recently discovered that the temperature in IN-662 fell below the trip temperature at 0000 on October 27, 2009 but the automatic trip system did not activate. Burning of heavy ends was discontinued at 0046 on October 27, 2009 to repair the temperature indicator." This is a violation of Part 70 Specific Condition 4 of Title V Permit No. 2224-V1, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(2);
- SSSS. According to a report dated June 10, 2010, "The three-hour rolling average limit of 10 ppm vinyl chloride was exceeded on the Industrial Furnace (IN-662) on April 12, 2010 beginning at 0359 hours." The failure to

control emissions as specified in Title V Permit No. 2224-VI is a violation of 40 CFR 61.63(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116; 40 CFR 63.113(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122; Part 70 General Condition C of Title V Permit No. 2224-V0; LAC 33:III.501.C.4; LAC 33:III.905; LAC 33:III.5109.A; La. R.S. 30:2057(A)(1); and 30:2057(A)(2);

TTTT. According to a report dated June 10, 2010, a release of approximately 266 pounds of vinyl chloride occurred on March 30, 2010, from the Closed Mode Collection Tank Recycle Line due to, "piping failure." This release is a violation of LAC 33:III.501.C.2, LAC 33:III.905, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

### COMPLIANCE ORDER

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

I.

To immediately take, upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to achieve and maintain compliance with the Act and all applicable Air Quality Regulations, including, but not limited to, all terms and conditions of Title V Permit Nos. 881-V3, 1267-V1, 2030-V0, 2056-V0, 2224-V1, 2906-V2, and 2907-V1.

II.

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. 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  
**Attention: Chris Kotrlik**  
**Enforcement Tracking No. AE-CN-09-0083**  
**Agency Interest No. 2455**

**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. AE-CN-09-0083**  
**Agency Interest No. 2455**

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 Chris Kotrlík at (225) 219-3752 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

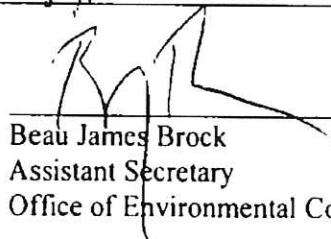
The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross

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.

IV.

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

Baton Rouge, Louisiana, this 29 day of September, 2010.

  
Beau James Brock  
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: Chris Kotrlík



**BOBBY JINDAL**  
GOVERNOR

**PEGGY M. HATCH**  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**OFFICE OF ENVIRONMENTAL COMPLIANCE**

June 28, 2013

CERTIFIED MAIL (7005 0390 0006 1028 1091)  
RETURN RECEIPT REQUESTED

**GEORGIA GULF CHEMICALS & VINYLs, LLC**  
c/o Corporation Service Company  
Agent for Service of Process  
320 Somerulos Street  
Baton Rouge, Louisiana 70802-6129

**RE: AMENDED CONSOLIDATED COMPLIANCE ORDER &  
NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. AE-CN-09-0083A  
AGENCY INTEREST NO. 2455**

Dear Sir:

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

Any questions concerning this action should be directed to Amanda DeRouen Polito at 225.219.3093 or amanda.polito@la.gov.

Sincerely,

Celena J. Cage  
Administrator  
Enforcement Division

CJC/APDP  
Alt ID No. 1280-00002  
Attachment



STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

<p>IN THE MATTER OF</p> <p><b>GEORGIA GULF CHEMICALS &amp; VINYLS, LLC</b></p> <p><b>IBERVILLE PARISH</b></p> <p><b>ALT ID NO. 1280-00002</b></p> <p><b>PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT, La. R.S. 30:2001, ET SEQ.</b></p>	<p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p>	<p><b>ENFORCEMENT TRACKING NO.</b></p> <p><b>AE-CN-09-0083A</b></p> <p><b>AGENCY INTEREST NO.</b></p> <p><b>2455</b></p>
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**AMENDED CONSOLIDATED COMPLIANCE ORDER &  
NOTICE OF POTENTIAL PENALTY**

The Louisiana Department of Environmental Quality (the Department) hereby amends the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-09-0083** issued to **GEORGIA GULF CHEMICALS & VINYLS, LLC (RESPONDENT)** on September 29, 2010, in the above-captioned matter as follows:

I.

The Department hereby amends the Findings of Fact portion of AE-CN-09-0083 to remove paragraphs III.A, III.B, III.C, III.D, III.E, III.F, and III.NN in their entirety.

II.

The Department incorporates all of the remainder of the original **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-09-0083** and **AGENCY INTEREST NO. 2455** as if reiterated herein.



III.

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

Baton Rouge, Louisiana, this 28 day of June, 2013.



\_\_\_\_\_  
Cheryl Sonnier Nolan  
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  
Post Office Box 4312  
Baton Rouge, LA 70821-4312  
Attention: Amanda DeRouen Polito