

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

JEFFERSON PARISH GOVERNMENT

AI # 19537

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

* Settlement Tracking No.
* SA-WE-22-0027
*
* Enforcement Tracking No.
* WE-CN-19-00049B
*
* Docket No. 2021-7920-DEQ
* c/w 2016-8124-EQ
*

SETTLEMENT

The following Settlement is hereby agreed to between Jefferson Parish Government (“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 governmental entity that owns and/or operates a sanitary treatment plant located on the east bank of the Mississippi River in Jefferson, Jefferson Parish, Louisiana (“the Facility”).

II

On September 22, 2021, the Department issued to Respondent an Amended Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. WE-CN-19-00049B (Exhibit 1). The Department also issued prior compliance orders and warning letters to Respondent for the same Facility: WE-C-14-00962, WE-C-14-00962A, WE-CN-19-0049, WE-CN-10-0049A, and WE-L-21-00829, in all of which Respondent made timely requests for hearings or responded to.

III

In response to the Amended Consolidated Compliance Order & Notice of Potential Penalty, Respondent made a timely request for a hearing.

IV

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

V

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 FORTY-THREE THOUSAND SIX HUNDRED SIXTY AND NO/100 DOLLARS (\$43,660.00), of which Nine Hundred Forty-Eight and 54/100 Dollars (\$948.54) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement.

VI

Respondent, in addition to the penalty amount specified in Paragraph V above and as part of this Settlement, agrees to expend the amount of FORTY-THREE THOUSAND SIX HUNDRED SIXTY AND NO/100 DOLLARS (\$43,660.00) to implement and/or perform the following beneficial environmental project:

- A. East Bank Household Hazardous Material Pickups; 1) FORTY-THREE THOUSAND SIX HUNDRED SIXTY AND NO/100 DOLLARS (\$43,660.00); and 2) completed by the end of the second quarter of 2023 for one project.
- B. Respondent shall submit monthly reports regarding its progress on the projects. The first shall be due on the 5th of the month following the date the Department signs this Settlement. Monthly reports shall be submitted on the 5th of every month thereafter

until the project is completed. Each such monthly report shall include a description of the project, tasks completed, tasks remaining, the percentage completed, and money expended on each project through the date of the report. Upon completion of all projects required under this Settlement, Respondent shall submit a final report to include a summary of all the information previously submitted and a total amount spent on the projects listed above. It shall also contain a certification that the projects were completed as described.

- C. If Respondent does not spend the amount of \$43,660.00, then it shall, in its final report, propose additional projects for the Department's approval or pay to the Department in an amount equal to the difference between the amount of money agreed to be spent and the amount of money actually spent.
- D. The total amount of money expended by Respondent on cash payments to the Department and on beneficial environmental projects, as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30: 2050.7(E)(1).

VII

Respondent further agrees that the Department may consider the inspection report(s), permit record(s), the Amended 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.

VIII

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. This agreement covers all violations cited by the Department herein, as well as any other similar overflows, exceedances, upsets, and other violations at the same Facility through July 12, 2022.

IX

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 and the rules relating to beneficial environmental projects set forth in LAC 33:I.Chapter 25.

X

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.

XI

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Jefferson 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.

XII

Payment is to be made within ten (10) days from notice of the Secretary's signature. 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).

XIII

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

XIV

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.

JEFFERSON PARISH GOVERNMENT

BY: Peggy O. Barton
(Signature) (authorized by resolution No. 135695)
PEGGY O. BARTON
(Printed)

TITLE: PARISH ATTORNEY

THUS DONE AND SIGNED in duplicate original before me this 16th day of December, 20 22, at Gretna, LA 70053

[Signature]
NOTARY PUBLIC (ID # 25382)
MARC C. DOUGHERTY
ATTORNEY & NOTARY PUBLIC #25382

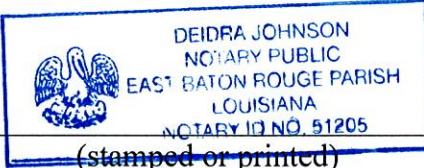
(stamped or printed)

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

BY: [Signature]
Celena J. Cage, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 6th day of March, 20 23, at Baton Rouge, Louisiana.

[Signature]
NOTARY PUBLIC (ID # 51205)


(stamped or printed)

Approved: [Signature]
Celena J. Cage, Assistant Secretary

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE				AMENDED	
ENFORCEMENT DIVISION		CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY			
POST OFFICE BOX 4312 BATON ROUGE, LOUISIANA 70821-4312					
Enforcement Tracking No.	WE-CN-19-00049B	Certified Mail No.	7003 2260 0000 5827 0134		
Agency Interest (AI) No.	19537	Contact Name	Scott B. Pierce		
Alternate ID No.	LA0066630	Contact Phone No.	(225) 219-3723		
Respondent:	Jefferson Parish Government	Facility Name:	East Bank Sanitary Treatment Plant		
	c/o The Honorable Cynthia Lee Sheng	Physical Location:	2 Humane Way		
	Joseph S. Yenni Bldg.				
	1221 Elmwood Park Blvd., Suite 1002	City, State, Zip:	Jefferson, LA 70123		
	Jefferson, LA 70123	Parish:	Jefferson		
This AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is issued 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). This AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY replaces AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. WE-CN-19-00049A issued on October 30, 2019, in its entirety.					
FINDINGS OF FACT					
An authorized representative of the Department inspected the abovementioned facility or conducted a file review of the facility to determine the degree of compliance with regulations promulgated in the Louisiana Administrative Code, Title 33. The State regulatory citations for the violation(s) identified during the inspection and/or file review are indicated below.					
I.	The Respondent owns and/or operates a sanitary treatment plant located at 2 Humane Way, Jefferson, Jefferson Parish, Louisiana. The Respondent was issued Louisiana Pollutant Discharge Elimination System (LPDES) Permit LA0066630 on February 3, 2012, with an effective date of March 1, 2012, and expiration date of February 28, 2017. The Respondent submitted a renewal application on or about September 2, 2016, and LPDES Permit LA0066630 was administratively continued until it was reissued on August 29, 2017, with an effective date of October 1, 2017. LPDES Permit LA0066630 will expire on September 30, 2022. Under the terms and conditions of LA0066630, the Respondent is permitted to discharge treated sanitary wastewater into the Mississippi River, all waters of the state.				
	On or about July 27, 2015, the Respondent was issued COMPLIANCE ORDER WE-C-14-00962, which was amended as WE-C-14-00962A on or about May 23, 2017. The Compliance Order incorporated a construction schedule for a sewer rehabilitation project to address sanitary sewer overflows (SSOs). The Respondent certified that on October 10, 2018, all treatment plant, lift station, and force main projects were completed. A review of the Respondent's records revealed that from November 2018 to July 2019, the Respondent continues to experience repetitive and ongoing SSOs, with 81 SSOs being reporting during that period.				
	Date of Violation	Description of Violation			
II.	Inspection(s) 1/26/2017 6/1/2018 8/1/2018 10/26/2018	The Respondent caused and/or allowed the unauthorized discharge of wastewater into waters of the state from a location not authorized by LPDES Permit LA0066630 and failed to properly operate and maintain all facilities and systems of treatment and control. Specifically, between the period of July 2015 and July 2021, the Respondent reported five hundred and sixty-four (564) SSOs from the facility's collection system. Each SSO entered parishwide storm drainages and ultimately into Lake Ponchartrain. (Unauthorized Discharges: Prior to October 1, 2017, LPDES Permit LA0066630 (Part II, Section A.2; after October 1, 2017, LPDES Permit LA0066630 (Other Conditions, Section A), La. R.S. 30:2076(A)(1)(a) and LAC 33:IX.501.D) (O&M: Prior to October 1, 2017, LPDES Permit LA0066630 (Part III, Section B.3.a; after October 1, 2017, LPDES Permit LA0066630 (Standard Conditions, Section B.3.a), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.E)			
	File Review 3/25/2019 10/29/2019 9/16/2021				
III.	Inspection(s) 6/1/2018 File Review 3/25/2019 10/29/2019	The Respondent failed to report SSOs as required by the permit at the time Discharge Monitoring Reports (DMRs) are submitted. Specifically, records and reports indicated that an SSO occurred at the Midway Drive manhole location. This SSO was reported by two separate complainants on May 21, 2018, and May 22, 2018. The Respondent did not report this SSO as required by the permit. (LPDES Permit LA0066630 (Other Conditions, Section F), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)			
IV.	File Review 3/25/2019 10/29/2019	The Respondent failed to sample the effluent from Outfall 001 on a quarterly basis as required by LPDES Permit LA0066630. Specifically, the Respondent failed to sample for Total nitrogen and Total phosphorus during the fourth (4 th) quarter 2017 monitoring period. (LPDES Permit LA0066630 (Effluent Limitations and Monitoring Requirements, pg. 1 of 4), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)			
V.	File Review 9/16/2021	The Respondent failed to comply with LPDES Permit LA0066630. Specifically, a review of Discharge Monitoring Reports (DMRs) between July 2017 and July 2021, revealed that the Respondent reported an exceedance of the permit effluent limitation for the TSS weekly average during the March 2021 monitoring period. The reported value of 62 mg/L exceeded the permit limit of 45 mg/L. (LPDES Permit LA0066630 (Effluent Limitations and Monitoring Requirement, pg. 1 of 4), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)			
ORDER					
Based on the foregoing, the Respondent is hereby ordered to comply with the requirements that are indicated below:					
I.	To take, immediately upon receipt of this COMPLIANCE ORDER, any and all steps necessary to meet and maintain compliance with the Water Quality Regulations. This shall include, but not be limited to; correcting <u>all</u> of the violations described in the "Findings of Fact" portion.				
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 violation(s) 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 the Department at the address specified in this document.				
III.	The Respondent shall accomplish the following tasks and comply with the following schedule of activities, included as Attachment A, or any amendment of that schedule approved in writing by the Department.				



IV.	The Respondent shall submit progress reports to the Enforcement Division following each calendar quarter until the completion of the aforementioned schedule. The Respondent shall submit each progress report within fifteen (15) days following the end of the calendar quarter. The next progress report is due by the 15 th day of the month following the end of the quarter in which this COMPLIANCE ORDER is received. Additionally, if an activity cannot be completed by the due date specified in the schedule, the Respondent shall submit a certification of non-compliance to the Department within fifteen (15) days after the scheduled due date. If the Respondent reports non-compliance with a scheduled event, the certification shall include a discussion of the cause of the delay, an anticipated date of completion, and a discussion of any impairment of a subsequent due date. Upon completion of all scheduled events, the Respondent shall submit a final certification stating that all activities have been achieved.
RIGHT TO APPEAL	
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 left-hand corner of the first page of this document and should be directed to the address specified in this document.
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 Division of Administrative Law's (DAL) Procedural Rules. 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 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 Scott B. Pierce at (225) 219-3723 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.	This CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is effective upon receipt.
CONTACTS AND SUBMITTAL OF INFORMATION	
Enforcement Division: Louisiana Department of Environmental Quality Office of Environmental Compliance Water Enforcement Division Post Office Box 4312 Baton Rouge, LA 70821 Attn: Scott B. Pierce	Hearing Requests: 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. WE-CN-19-00049B Agency Interest No. 19537
Water Permits Division (if necessary): Department of Environmental Quality Office of Environmental Services Post Office Box 4313 Baton Rouge, LA 70821-4313 Attn: Water Permits Division	Physical Address (if hand delivered): Department of Environmental Quality 602 N Fifth Street Baton Rouge, LA 70802

**HOW TO REQUEST CLOSURE OF THIS AMENDED CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY**

- To appeal the AMENDED CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY, the Respondent must follow the guidelines set forth in the "Right to Appeal" portion of this AMENDED CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY.
- To request closure of the COMPLIANCE ORDER portion, the Respondent must demonstrate compliance with the "Order" portion of this AMENDED COMPLIANCE ORDER by completing the attached "AMENDED CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE" form and returning it to the address specified.
 - Before requesting closure of this COMPLIANCE ORDER portion, please contact the Financial Services Division at 225-219-3865 or email them at _DEQ-WWWFinancialServices@la.gov to determine if you owe outstanding fees.
- To expedite closure of the 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 Department assesses civil penalties based on LAC 33:1.Subpart1.Chapter7.
 - The Respondent may offer a settlement amount but the Department is under no obligation to enter into settlement negotiations. It is decided upon on a discretionary basis.
 - The settlement offer amount may be entered on the attached "AMENDED 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.
 - Before requesting closure of the NOTICE OF POTENTIAL PENALTY portion, please contact the Financial Services Division at 225-219-3865 or email them at _DEQ-WWWFinancialServices@la.gov to determine if you owe outstanding fees.

If you have questions or need more information, you may contact Scott B. Pierce at (225) 219-3723 or scott.pierce@la.gov.




Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

Date: 9-22-2021

cc: Jefferson Parish Sewerage Department
c/o Michael P. Lockwood, MSPH, Director
Joseph S. Yenni Bldg.
1221 Elmwood Park Blvd., Ste. 803
Jefferson, LA 70123

ecc: DHH/Office of Public Health

Attachment(s)
- Request to Close

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE ENFORCEMENT DIVISION POST OFFICE BOX 4312 BATON ROUGE, LOUISIANA 70821-4312		AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE		
Enforcement Tracking No.	WE-CN-19-00049B	Contact Name	Scott B. Pierce	
Agency Interest (AI) No.	19537	Contact Phone No.	(225) 219-3723	
Alternate ID No.	LA0066630			
Respondent:	Jefferson Parish Government	Facility Name:	East Bank Sanitary Treatment Plant	
	c/o The Honorable Cynthia Lee Sheng	Physical Location:	2 Humane Way	
	Joseph S. Yennl Bldg.	City, State, Zip:	Jefferson, LA	
	1221 Elmwood Park Blvd., Suite 1002	Parish:	Jefferson	
Jefferson, LA 70123				
STATEMENT OF COMPLIANCE				
STATEMENT OF COMPLIANCE		Date Completed	Copy Attached?	
A written report was submitted in accordance with Paragraph II of the "Order" portion of the AMENDED COMPLIANCE ORDER.				
All tasks and schedule of activities, included as Attachment A, or any amendment of that schedule approved in writing by the Department have been accomplished in accordance with Paragraph III of the "Order" portion of the AMENDED 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)				
<i>(check the applicable option)</i>				
_____	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 33:1.Subpart 1. Chapter 7.			
_____	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (WE-CN-19-00049B), 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 (WE-CN-19-00049B), 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. <ul style="list-style-type: none"> • 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 (WE-CN-19-00049B) 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 Post Office Box 4312 Baton Rouge, LA 70821 Attn: Scott B. Pierce				

If you have questions or need more information, you may contact Scott B. Pierce at (225) 219-3723 or scott.pierce@la.gov.

ATTACHMENT A

JEFFERSON PARISH SEWER CAPITAL IMPROVEMENT PROGRAM
CONSTRUCTION SCHEDULE

Project Name	Completion Date
E5-4 Transcontinental & W. Metairie Lift Station Upgrades (Complete Rehabilitation of station including new pumps, piping, valves, electrical, and odor control)	Completed
E1-1 Hord & Humphrey Lift Station Upgrades (Rehabilitation of station including new pumps, piping, and valves)	Completed
D6-9, David Drive & York Ave. (Installing a new lift station to replace old station)	Completed
G6-2 Gatehouse Apts. Lift Station Upgrades (Installing a new lift station to replace old station)	Completed
Helios Lift Station Improvements (Rehabilitation of station including new pumps, piping, valves, and electrical)	Completed
D8-5, Cleveland & Avron (Rehabilitation of station including new pumps, piping, valves, and electrical)	Completed
H3-3 Ochsner Hospital Lift Station Upgrades (Rehabilitation of station including new pumps, piping, valves, and electrical)	Completed
Mississippi & 21st Street (Installing a new lift station to replace old station)	Completed
F7-18B Stefano & Wanda Lynn: F7-12 Rockford & Grace King (Rehabilitating two lift stations with new pumps, piping, valves, electrical, and odor control)	9/30/21
G7-8 Ridgelake & 25th Lift Station Upgrades (Installing a new lift station to replace old station)	9/30/21
F8-3 Houma & West Esplanade (Installing a new lift station to replace old station)	9/30/21
C4-1A, N. Sibley & Boone (Rehabilitation of station including new pumps, piping, valves, and electrical)	11/30/21
Upgrade of 37th & Purdue Lift Station (D3-8) (Installing a new lift station and force main to replace old station)	6/30/22
E3-7 Camp Plauche (Rehabilitation of station including new pumps, piping, valves, and electrical)	6/30/22
G-4-2B Causeway Blvd. & Scott Street (Rehabilitation of station including new pumps, piping, valves, and electrical)	7/31/22
Fulton & Mississippi LS (Installing two new lift stations to replace old stations)	7/31/22
D-2-3 Melrose Lane & Upstream Street (Installing a new lift station to replace old station)	8/31/22
D4-2, N. Pierce & Versailles (Installing a new lift station and force main to replace old station)	8/31/22
F-1-1 Plantation Road & Toler Drive (Rehabilitation of station including new pumps, piping, valves, and electrical)	8/31/22
E3-2 Elmwood & Citrus Lift Station Upgrades (Rehabilitation of station including new pumps, piping, valves, and electrical)	9/30/22
H6-5 Smith & Toulouse Lift Station Upgrades (Installing a new lift station to replace old station)	10/30/22
F8-5 Cleary & West Esplanade (Installing a new lift station and gravity lines to replace two old stations)	12/31/22
Rehabilitation of Causeway & W. Esplanade Lift Stations (N&S) (Installing a new lift station and gravity lines to replace two old stations)	12/31/23
Cleary and W. Napoleon North Lift Station (Rehabilitation of station including new pumps, piping, valves, and electrical)	12/31/23