

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

SHINTECH LOUISIANA, LLC

AI # 83425

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

* Settlement Tracking No.
* SA-AE-22-0006
*
* Enforcement Tracking No.
* AE-CN-17-01074
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SETTLEMENT

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

I

Respondent is a limited liability company that owns and/or operates a polyvinyl chloride plant located in Addis, West Baton Rouge Parish, Louisiana (“the Facility”).

II

On May 13, 2019, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-17-01074 (Exhibit 1).

III

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

IV

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

statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of THIRTY-SEVEN THOUSAND AND NO/100 DOLLARS (\$37,000.00), of which One Thousand Nine Hundred Thirty-Eight and 86/100 Dollars (\$1,938.86) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

V

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

VI

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

VII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing

to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

VIII

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

IX

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

X

Payment is to be made 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).

XI

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

XII

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

SHINTECH LOUISIANA, LLC

BY: David A. Gedstal, Jr.
(Signature)

David A. Gedstal, Jr.
(Printed)

TITLE: Vice President of Manufacturing

THUS DONE AND SIGNED in duplicate original before me this 19th day of May, 2022, at West Baton Rouge.

Melissa D. Toups
NOTARY PUBLIC (ID # 0566116)

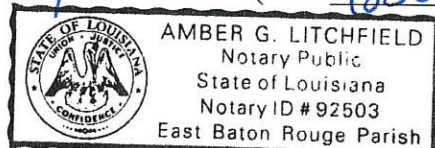
Melissa D. Toups
(stamped or printed)

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

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

THUS DONE AND SIGNED in duplicate original before me this 9th day of August, 2022, at Baton Rouge, Louisiana.

Amber G. Litchfield
NOTARY PUBLIC (ID # 92503)



(stamped or printed)

Approved: Celena J. Cage
Celena J. Cage, Assistant Secretary



JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

May 13, 2019

CERTIFIED MAIL (7017 0530 0000 5978 8718)
RETURN RECEIPT REQUESTED

SHINTECH LOUISIANA, LLC
c/o Capitol Corporate Services, Inc.
Agent for Service of Process
8550 United Plaza Building II, Ste. 305
Baton Rouge, LA 70809

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-17-01074
AGENCY INTEREST NO. 83425**

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 **SHINTECH LOUISIANA, 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 Christopher Clement at (225) 219-3748 or Christopher.Clement@la.gov.

Sincerely,

Celenia J. Cage
Administrator
Enforcement Division

CJC/CGC/cgc
Alt ID No. 3120-00070
Attachment



c: Shintech Louisiana, LLC
Timothy Bergeron – Environmental Manager
P.O. Box 358
Addis, LA 70710

II.

On or about October 11, 2017, the Department issued Consolidated Compliance Order & Notice of Potential Penalty (CONOPP) AE-CN-15-01175 to the Respondent.

III.

On or about March 16 – 18, 2016, and March 23, 2016, an inspection of the Respondent's facility were conducted 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 inspections and subsequent file review conducted on November 28, 2018:

- A. The Respondent did not conduct the semiannual inspections of cyclones and baghouses for the second half of 2015 for Scrubbers A and B and Delivery and Bagging Silo Group (EQT's 0026, and 0027 and GRP 0002 (0028 – 0033, 0084 – 0093, 0095 – 0097). The failure to perform the inspections is a violation of Specific Requirement Nos. 3, 10, and 342 of Title V Permit No. 2639-V7, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- B. The Respondent did not follow the sampling methods according to the instructions in Method 624 and Method 107 for heat exchange system samples in May, June, July, and October 2015 for total strippable volatile organic compounds (VOCs), hazardous air pollutants (HAPs) and vinyl chloride. Specifically, sample condition sheets indicated that the headspace in samples in May and June 2015 was greater than six (6) millimeters. Additionally, large bubbles were noted in vials for the October 2015 samples. This is a violation of Specific Requirement No. 359 of Title V Permit No. 2639-V7, 40 CFR 63.11920(a)(3)(ii) and 40 CFR 63.11920(a)(3)(iii), which language has been incorporated by reference in LAC 33:III.5122.A, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. The Respondent did not follow the filling instructions for sampling methods in Method 8260 and Method 107 for process wastewater samples in October and December 2015 and February 2016 for total non-vinyl chloride organic

HAPs and vinyl chloride. Specifically, the sampling methods require there be no headspace when the vials are sealed and inverted; however, sample condition sheets indicated that there was headspace greater than 6 millimeters in several of the sample vials. This is a violation of Specific Requirement No. 359 of Title V Permit No. 2639-V7, 40 CFR 63.11980(a)(2)(i) and 40 CFR 63.11980(a)(3), which language has been incorporated by reference in LAC 33:III.5122.A, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

- D. The Respondent failed to conduct weekly visual pump inspections on pumps with dual mechanical seals for dates shown in the table below. Specifically, the following table shows the dates before and after inspections were conducted:

Inspection	Next Inspection	Days Between Inspections
November 7, 2014	November 20, 2014	13
November 20, 2014	December 5, 2014	15
December 11, 2014	December 26, 2014	15
December 26, 2014	January 15, 2015	20
January 15, 2015	January 29, 2015	14
March 7, 2015	March 19, 2015	12
April 9, 2015	April 23, 2015	14
April 23, 2015	May 7, 2015	14
May 7, 2015	May 21, 2015	14
July 17, 2015	July 30, 2015	13
November 19, 2015	December 4, 2015	15
December 17, 2015	January 8, 2016	22
January 28, 2016	February 19, 2016	22

Each failure to perform an inspection at the required interval is a violation of Specific Requirement Nos. 333 of Title V Permit No. 2639-V7, 40 CFR 63.163(b)(3) and 40 CFR 63.163(e)(4), which language has been incorporated by reference in LAC 33:III.5122.A, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

- E. The Respondent did not report all equipment leaks in the Semiannual Leak Detection and Repair (LDAR) Reports for the Second Half 2014 and First and Second Half 2015. Specifically, the following leaking components were not reported:

Leak Date	Equipment
December 4, 2014	PUN-301
December 10, 2014	PCM-351C
December 10, 2014	PCM-351B
March 18, 2015	PCM-351B 2 nd Stage
December 15, 2015	PTK-201 Sight Glass

This is a violation of Specific Requirement No. 334.C of Title V Permit No. 2639-V7, 40 CFR 63.182(d)(1), which language has been incorporated by reference in LAC 33:III.5122.A, LAC 33:III.2122, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

- F. The Respondent failed to complete repairs to two connectors within the required 15 days. Specifically, the 2015 LDAR leaking components record revealed leaks for two (2) connectors (PCM-351A and PCM-351B) on June 23, 2015. However, the repairs were not completed until July 9, 2015, sixteen (16) days after the leak was detected. This is a violation of Specific Requirement No. 333 of Title V Permit No. 2639-V7, 40 CFR 63.174(d), which language has been incorporated by reference in LAC 33:III.5122.A, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

IV.

On or about January 30, 2018, through February 1, 2018, an inspection of the Respondent's facility was conducted 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 inspections and subsequent file review conducted on November 28, 2018:

- A. The Respondent failed to promptly address and resolve one (1) recommendation (action item) from the 2007 Process Hazard Analysis (PHA).

Specifically, the 2007 revalidation PHA recommendation 37.3.4.1.1 was to "check/change software to prevent SV-2N51 from reopening if the temperature is within close range of target temperature". This action item was not addressed and had been noted on each subsequent PHA. This is a violation of Specific Requirement 393 of Title V Air Permit No. 2639-V7, 40 CFR 68.67(e), which language has been incorporated by reference in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2). In an email to the inspector dated March 5, 2018, the Respondent stated that the action item would be addressed in the 2018 maintenance shutdown and subsequently provided documentation that the action item had been addressed.

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- B. The Respondent failed to provide refresher training at least every three (3) years, or more often if necessary, to each employee involved in operating a process. Specifically, one (1) worker did not complete refresher training for Units 250 and 300 which was due on July 9, 2017, and September 13, 2017, respectively. Two (2) other workers did not complete the 2015 refresher training which was due in May 2015 until December 2015. Additionally, the only training dates available for another worker were May 11, 2004 and March 13, 2016. This worker became a supervisor and did not complete refresher training until the 2016 Process Safety Management (PSM) Audit identified that supervisors should complete refresher training. Each failure to provide refresher training timely is a violation of Specific Requirement 393 of Title V Air Permit No. 2639-V7, 40 CFR 68.71(b), which language has been incorporated by reference in LAC 33:III.5901.A, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. The Respondent failed to implement their written procedures to manage changes to the process. Specifically, MOC #2015018 had only one (1) approval signature to allow the change to begin, per the facility policy at least two (2) approval signatures are needed. Further, this was the only dated signature on the MOC form, the rest of the MOC form was left blank, and the

change was still implemented. This is a violation of Specific Requirement 393 of Title V Air Permit No. 2639-V7, 40 CFR 68.75(a), which language has been incorporated by reference in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2).

D. The Respondent failed to conduct a Pre-Startup Safety Review (PSSR) for a new stationary source. Specifically, a PSSR was not conducted for MOC #2015018 before the change was implemented. This is a violation of Specific Requirement 393 of Title V Air Permit No. 2639-V7, 40 CFR 68.77(a), which language has been incorporated by reference in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2).

E. The Respondent failed to promptly assign a responsible person and due dates to all action items listed in the 2016 Compliance Audit and document that all deficiencies have been corrected. Specifically, approximately 18 months had elapsed before the Respondent assigned a responsible person and due dates to 43 action items listed in the 2016 Compliance Audit spreadsheet and there was no documentation that deficiencies had been corrected. This is a violation of Specific Requirement 393 of Title V Air Permit No. 2639-V7, 40 CFR 68.79(d), which language has been incorporated by reference in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2). In an email to the inspector dated February 23, 2018, the Respondent attached a spreadsheet which included the combined action items from the 2013 and 2016 PSM audits and the recommendations from the 2017 PHA. All action items were assigned to a responsible person and target completion dates were identified.

COMPLIANCE ORDER

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

I.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Act and Air Quality Regulations, including but not limited to all applicable requirements contained in Title V Permit No. 2639-V7 and LAC 33:III.5901.

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 ~~Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:~~

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Christopher Clement
Re: Enforcement Tracking No. AE-CN-17-01074
Agency Interest No. 83425

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-17-01074
Agency Interest No. 83425

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 (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 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 Christopher Clement at (225) 219-3748 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement

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

v.

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

Baton Rouge, Louisiana, this 13th day of May, 2019.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

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

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



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL COMPLIANCE
 ENFORCEMENT DIVISION CONSOLIDATED COMPLIANCE ORDER &
 POST OFFICE BOX 4312 NOTICE OF POTENTIAL PENALTY
 BATON ROUGE, LOUISIANA 70821-4312 REQUEST TO CLOSE

Enforcement Tracking No.	AE-CN-17-01074	Contact Name	Christopher Clement
Agency Interest (AI) No.	83425	Contact Phone No.	(225) 219-3748
Alternate ID No.	3120-00070		
Respondent:	Shintech Louisiana, LLC	Facility Name:	Addis Plant A
	c/o Capitol Corporate Services, Inc.	Physical Location:	9750 Louisiana Highway 1 South
	Agent for Service of Process		
	8550 United Plaza Building II, Ste. 305	City, State, Zip:	Addis, LA 70710
	Baton Rouge, LA 70809	Parish:	West Baton Rouge

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 COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) ? of the "Order" portion of the COMPLIANCE ORDER.	N/A	
All necessary documents were submitted to the Department within 45 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) ? of the "Order" portion of the COMPLIANCE ORDER.	N/A	
All necessary documents were submitted to the Department within 90 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) ? of the "Order" portion of the COMPLIANCE ORDER.	N/A	
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:I.Subpart1.Chapter7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY (AE-CN-17-01074), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY (AE-CN-17-01074), 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.
<input type="checkbox"/>	The Respondent has reviewed the violations noted in COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY (AE-CN-17-01074) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT

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

Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date

MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

Louisiana Department of Environmental Quality
 Office of Environmental Compliance
 Enforcement Division
 P.O. Box 4312
 Baton Rouge, LA 70821
 Attn: Christopher Clement