STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:	*	**Settlement Tracking No. SA-AE-15-0020**
HONEYWELL INTERNATIONAL, INC.	*	
AI # 289	*	**Enforcement Tracking No. AE-CN-12-01267**
PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT LA. R.S. 30:2001, ET SEQ.	*	

SETTLEMENT

The following Settlement is hereby agreed to between Honeywell International, Inc. ("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 corporation that owns and/or operates an integrated refrigerant manufacturing facility located in East Baton Rouge Parish, Louisiana ("the Facility").

II

On March 25, 2013, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-12-01267 which was based upon the following findings of fact:

"The Respondent owns and/or operates the Baton Rouge Plant (the Facility), an integrated manufacturing facility that produces refrigerant products. The facility is located at the intersection of Lupine Avenue and Ontario Street in Baton Rouge, East Baton Rouge Parish, Louisiana. The Facility operates or has operated under the authority of the following Title V Air Permits:

PERMIT	ISSUE DATE	EXPIRATION DATE
0840-00001-V1	3/3/2006	9/20/2006 (renewal application received on 3/20/2006)
0840-00001-V2	5/13/2008	5/13/2013
0840-00001-V3	4/23/2009	5/13/2013
0840-00001-V4	4/23/2010	5/13/2013
0840-00001-V5	10/15/2010	5/13/2013
0840-00001-V6	4/26/2011	5/13/2013
0840-00001-V7	12/14/2011	5/13/2013
0840-00001-V8	10/16/2012	5/13/2013

On or about December 30, 2008, through January 8, 2009, an inspection was conducted of the Respondent's facility 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 violation was noted during the course of the inspection:

> The Emission Point EQT0035, 1209-375 Air Compressor No. 14, is permitted to operate 500 hours per year (hrs/yr). For the 2008 calendar year, the Respondent operated EQT0035 for a total of 2141.4 hours. Title V Permit No. 0840-00001-V3 dated April 23, 2009, increased the permitted operating time for EQT0035 to 3000 hrs/yr. The Respondent's operation of EQT0035 in excess of 500 hrs/yr for the 2008 calendar year is a violation of Title V Permit No. 0840-00001-V2, LAC 33:501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

On or about October 1, 2012, the Department conducted a file review to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits from January 1, 2007, through September 30, 2012. While the review is not yet complete, the Department noted the violations found in paragraphs IV-XI of the Findings of Fact portion of this enforcement order.

The Respondent reported the following unauthorized releases:

	REPORT (date)	SOURCE OF RELEASE	DURATION	POLLUTANTS RELEASED	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	Unauthorized Discharge Notification For T101009 (11/16/2007)	No. 1 HF vaporizer and condensate pipe	11/12/2007 (1 hour 42 minutes)	Hydrogen Fluoride	75.6	The fresh HF vaporizer coils failed and the condensate pipe leaking.	LAC 33:III.905
B.	Unauthorized Discharge Notification for T103317 (2/28/2008)	Chloroform unloading area	12/21/2008 - 12/22/2008 (25 hours)	Chloroform	39	Following the repair of a pump, the pump maintenance failed allowing the release through the bleed valve in the system.	LAC 33:III.905
C.	Unauthorized Discharge Notification for T114939 (5/19/2009)	Vent line	5/13/2009 (36 minutes)	Hydrochloric Acid	7.5	An internal chemical reaction occurred due to a nitrogen purge being cut off to the tank. The nitrogen purge is utilized for level indication. The cut off of the nitrogen purge allowed oxygen to build up in the tank causing an internal chemical reaction leading to release.	LAC 33:III.905
				Hydrofluoric Acid	4		
				Oxalic Acid	11.5		
D.	Unauthorized Discharge Notification for T121458 (2/17/2010)	Process wastewater line	2/11/2010 (40 minutes)	Hydrofluoric Acid	3.76	Line was drained to the HF scrubber for discharge into plant's Effluent Treatment System because of a small leak on a flange. Once in the wastewater line the HF reacted with caustic causing release.	LAC 33:III.905
E.	Unauthorized Discharge Notification for T122636 (4/15/2010)	Pressure Relief Valve	4/8/2010 (15 minutes)	Hydrochloric Acid	533	The plant was in the process of repairing a pressure transmitter. When the transmitter was isolated for repair, this inadvertently caused an over pressure of the system. Upon investigation, it was determined that the pressure transmitter that was being repaired controls two control valves during normal operations, and these two-control valves should have been bypassed or opened manually during the repair.	LAC 33:III.905
F.	Unauthorized Discharge Notification for T123119 (5/6/2010)	Pipe on OMNI 143A Unit	4/29/2010 (15 minutes)	Hydrochloric Acid	119.8	A pipe leak. The pipe integrity had been compromised during certain operating conditions of the unit. These operating conditions are called catalyst burn downs. The investigation revealed that the chemical compatibility of the pipe needs to be upgraded in order to prevent a similar incident.	LAC 33:III.905
				Hydrofluoric Acid	2.16		
				Chlorine	0.0038		

Each unauthorized release of emissions is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

Emission Source 201 G-1113 Unit Process Vent, RLP 00008, is required to maintain removal efficiency of Volatile Organic Compounds (VOCs) by no less than 94.6 percent by maintaining the maximum temperature of the inlet methanol stream at 50°F and the minimum chilled methanol flowrate at 1.5 gallons per minute. The following table indicates the periods during which the

maximum temperature and/or flowrate operated out of established ranges:

	REPORT (date)	PERMIT NUMBER	INCIDENT DATE	DURATION (hours)	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
A.	2007 Title V Second Quarter Deviation Report (9/14/2007)	0840-00001-V1	6/6/2007-6/7/2007	12	Temperature out of range.	Part 70 Specific Condition 1 Table 2
B.	2007 Title V Third Quarter Deviation Report (12/21/2007)	0840-00001-V1	7/5/2007	12	Flow out of range due to lost circulation.	Part 70 Specific Condition 1 Table 2
C.		0840-00001-V1	7/14/2007	12	Temperature out of range due to lost circulation.	
D.		0840-00001-V1	8/25/2006 – 8/28/2006	58.07	Flow/temperature out of range; scrubber down due to Entergy gas leak.	
E.		0840-00001-V1	8/10/2007-8/11/2007	12	Temperature out of range.	
F.		0840-00001-V1	8/15/2007	12	Temperature out of range.	
G.		0840-00001-V1	8/16/2007	12	Temperature out of range.	
H.		0840-00001-V1	9/6/2007 – 9/7/2007	36	Temperature out of range; Carrier Down	
I.	2007 Title V Fourth Quarter Deviation Report (3/26/2008)	0840-00001-V1	12/9/2007 – 12/13/2007	84	Equipment malfunction due to pump vapor lock.	Part 70 Specific Condition 1 Table 2
J.		0840-00001-V1	12/13/2007 – 12/14/2007	24	Equipment malfunction due to pump vapor lock.	
K.	2009 Title V Second Quarter Deviation Report (9/24/2009)	0840-00001-V2	4/8/2009	1.72	Flow out of range due to process upset	Specific Requirements 161 and 162
L.	2009 Title V Third Quarter Deviation Report (12/23/2009)	0840-00001-V3	7/18/2009	12	Temperature out of range.	Specific Requirement 141 and 144
M.		0840-00001-V3	7/21/2009 – 7/22/2009	32	Temperature and flow out of range due to shut down for pump repair.	Specific Requirements 141 and 144
N.		0840-00001-V3	8/11/2009	4.83	Temperature out of range due to plug of scrubber circulation line.	Specific Requirements 141 and 144
O.	2009 Title V Fourth Quarter Deviation Report (3/31/2010) & Second Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (3/31/2010)	0840-00001-V3	10/13/2009	0.08	Flow out of range.	Specific Requirements 141 and 147
P.		0840-00001-V3	10/13/2009	0.56	Flow out of range.	Specific Requirements 141 and 147
Q.		0840-00001-V3	10/13/2009	0.15	Flow out of range.	Specific Requirements 141 and 147
R.		0840-00001-V3	10/13/2009	0.53	Flow out of range.	Specific Requirements 141 and 147
S.		0840-00001-V3	10/19/2009	0.35	Flow out of range.	Specific Requirements 141 and 147
T.		0840-00001-V3	10/19/2009	0.45	Flow out of range.	Specific Requirements 141 and 147
U.		0840-00001-V3	10/20/2009	0.22	Flow out of range.	Specific Requirements 141 and 147
V.		0840-00001-V3	10/21/2009	0.35	Flow out of range.	Specific Requirements 141 and 147
W.		0840-00001-V3	10/22/2009	0.38	Flow out of range.	Specific Requirements 141 and 147
X.		0840-00001-V3	10/22/2009	0.10	Flow out of range.	Specific Requirements 141 and 147
Y.		0840-00001-V3	10/23/2009	0.23	Flow out of range.	Specific Requirements 141 and 147
Z.		0840-00001-V3	10/23/2009	0.48	Flow out of range.	Specific Requirements 141 and 147
AA.		0840-00001-V3	10/25/2009	1.76	Flow out of range.	Specific Requirements 141 and 147

	REPORT (date)	PERMIT NUMBER	INCIDENT DATE	DURATION (hours)	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
BB.	2009 Title V Fourth Quarter Deviation Report (3/31/2010) & Second Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (3/31/2010) & Revised Deviation Report for 2009 (10/2/2012)	0840-00001-V3	10/25/2009	1.17	Flow out of range.	Specific Requirements 141 and 147
CC.		0840-00001-V3	10/25/2009	0.25	Flow out of range.	Specific Requirements 141 and 147
DD.		0840-00001-V3	10/25/2009	0.53	Flow out of range.	Specific Requirements 141 and 147
EE.		0840-00001-V3	10/26/2009	0.20	Flow out of range.	Specific Requirements 141 and 147
FF.		0840-00001-V3	10/26/2009	0.42	Flow out of range.	Specific Requirements 141 and 147
GG.		0840-00001-V3	11/6/2009	0.43	Flow out of range.	Specific Requirements 141 and 147
HH.		0840-00001-V3	11/7/2009	0.20	Flow out of range.	Specific Requirements 141 and 147
II.		0840-00001-V3	11/7/2009	0.57	Flow out of range.	Specific Requirements 141 and 147
JJ.		0840-00001-V3	11/7/2009	8.70	Flow out of range.	Specific Requirements 141 and 147
KK.		0840-00001-V3	11/8/2009	0.12	Flow out of range.	Specific Requirements 141 and 147
LL.		0840-00001-V3	11/8/2009	0.10	Flow out of range.	Specific Requirements 141 and 147
MM.		0840-00001-V3	11/8/2009	0.07	Flow out of range.	Specific Requirements 141 and 147
NN.		0840-00001-V3	11/8/2009	0.27	Flow out of range.	Specific Requirements 141 and 147
OO.		0840-00001-V3	11/9/2009	0.05	Flow out of range.	Specific Requirements 141 and 147
PP.		0840-00001-V3	11/9/2009	0.20	Flow out of range.	Specific Requirements 141 and 147
QQ.		0840-00001-V3	11/14/2009	0.12	Flow out of range; Line leak to foam pot.	Specific Requirements 141 and 147
RR.		0840-00001-V3	11/23/2009	0.17	Flow out of range; Lost circulation to scrubber.	Specific Requirements 141 and 147
SS.		0840-00001-V3	11/23/2009	0.05	Flow out of range; Lost circulation to scrubber.	Specific Requirements 141 and 147
TT.		0840-00001-V3	11/23/2009	0.03	Flow out of range; Lost circulation to scrubber.	Specific Requirements 141 and 147
UU.		0840-00001-V3	11/23/2009	0.03	Flow out of range; Lost circulation to scrubber.	Specific Requirements 141 and 147
VV.		0840-00001-V3	11/23/2009	0.03	Flow out of range.	Specific Requirements 141 and 147
WW.		0840-00001-V3	11/23/2009	0.03	Flow out of range.	Specific Requirements 141 and 147
XX.		0840-00001-V3	11/24/2009	0.17	Flow out of range; Lost circulation to scrubber.	Specific Requirements 141 and 147
YY.		0840-00001-V3	11/24/2009	0.44	Flow out of range; Lost circulation to scrubber.	Specific Requirements 141 and 147
ZZ.		0840-00001-V3	11/25/2009	0.05	Flow out of range; Desorber reboiler draw plugged.	Specific Requirements 141 and 147
AAA.		0840-00001-V3	11/26/2009	1.18	Flow out of range; Lost circulation to scrubber.	Specific Requirements 141 and 147
BBB.		0840-00001-V3	11/30/2009	0.20	Flow out of range.	Specific Requirements 141 and 147
CCC.		0840-00001-V3	12/20/2009	3.25	Flow out of range.	Specific Requirements 141 and 147

	REPORT (date)	PERMIT NUMBER	INCIDENT DATE	DURATION (hours)	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
DDD.	2009 Title V Fourth Quarter Deviation Report (3/31/2010) & Second Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (3/31/2010)	0840-00001-V3	10/11/2009	0.13	Temperature out of range.	Specific Requirements 141 and 144
EEE.		0840-00001-V3	10/12/2009	0.52	Temperature out of range.	Specific Requirements 141 and 144
FFF.		0840-00001-V3	10/23/2009	3.18	Temperature out of range; Plugged desorber reboiler draw.	Specific Requirements 141 and 144
GGG.		0840-00001-V3	10/26/2009	0.06	Temperature out of range.	Specific Requirements 141 and 144
HHH.		0840-00001-V3	11/14/2009	0.20	Temperature out of range; Leak in line to foam pot.	Specific Requirements 141 and 144
III.		0840-00001-V3	11/14/2009	0.18	Temperature out of range; Leak in line to foam pot.	Specific Requirements 141 and 144
JJJ.		0840-00001-V3	11/14/2009	0.22	Temperature out of range; Leak in line to foam pot.	Specific Requirements 141 and 144
KKK.		0840-00001-V3	11/16/2009-11/18/2009	10.17	Temperature out of range.	Specific Requirements 141 and 144
LLL.		0840-00001-V3	11/21/2009	0.23	Temperature out of range; Lack of desorber reboiler draw.	Specific Requirements 141 and 144
MMM.		0840-00001-V3	11/21/2009	0.27	Temperature out of range; Lack of desorber reboiler draw.	Specific Requirements 141 and 144
NNN.		0840-00001-V3	11/22/2009	0.52	Temperature out of range; Lack of desorber reboiler draw.	Specific Requirements 141 and 144
OOO.		0840-00001-V3	11/22/2009	0.35	Temperature out of range.	Specific Requirements 141 and 144
PPP.		0840-00001-V3	11/23/2009	0.20	Temperature out of range; Desorber malfunction.	Specific Requirements 141 and 144
QQQ.		0840-00001-V3	11/23/2009	0.33	Temperature out of range; Desorber malfunction.	Specific Requirements 141 and 144
RRR.		0840-00001-V3	11/23/2009	0.20	Temperature out of range.	Specific Requirements 141 and 144
SSS.		0840-00001-V3	11/23/2009	0.37	Temperature out of range.	Specific Requirements 141 and 144
TTT.		0840-00001-V3	11/25/2009	0.13	Temperature out of range.	Specific Requirements 141 and 144
UUU.		0840-00001-V3	11/25/2009	0.45	Temperature out of range; Desorber reboiler draw plugged.	Specific Requirements 141 and 144
VVV.		0840-00001-V3	11/25/2009	0.20	Temperature out of range; Desorber reboiler draw plugged.	Specific Requirements 141 and 144
WWW.		0840-00001-V3	11/25/2009	0.15	Temperature out of range; Drained desorber reboiler.	Specific Requirements 141 and 144
XXX.		0840-00001-V3	11/26/2009	0.17	Temperature out of range; Desorber reboiler draw plugged.	Specific Requirements 141 and 144
YYY.		0840-00001-V3	11/26/2009	0.05	Temperature out of range.	Specific Requirements 141 and 144
ZZZ.		0840-00001-V3	12/12/2009	0.12	Temperature out of range; Desorber reboiler draw plugged.	Specific Requirements 141 and 144
AAAA		0840-00001-V3	12/12/2009	0.13	Temperature out of range.	Specific Requirements 141 and 144
BBBB.		0840-00001-V3	12/20/2009	3.61	Temperature out of range.	Specific Requirements 141 and 144
CCCC.		0840-00001-V3	12/22/2009	0.42	Temperature out of range; No pressure on desorber.	Specific Requirements 141 and 144
DDDD		0840-00001-V3	12/31/2009	0.28	Temperature out of range; Desorber malfunction.	Specific Requirements 141 and 144

	REPORT (date)	PERMIT NUMBER	INCIDENT DATE	DURATION (hours)	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
EEEE.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V3	1/1/2010	0.04	Temperature out of range.	Specific Requirements 141 and 144
FFFF.		0840-00001-V3	1/1/2010	0.02	Temperature out of range.	Specific Requirements 141 and 144
GGGG.		0840-00001-V3	1/16/2010	1.40	Flow out of range due to plug in line and loss of circulation.	Specific Requirements 141 and 147
HHHH.		0840-00001-V3	1/17/2010	0.38	Flow out of range.	Specific Requirements 141 and 147
IIII.		0840-00001-V3	1/20/2010	0.19	Flow out of range due to loss of circulation due to circulation pump outage.	Specific Requirements 141 and 147
JJJJ.		0840-00001-V3	1/30/2010	0.56	Flow out of range.	Specific Requirements 141 and 147
KKKK.		0840-00001-V3	1/30/2010	0.11	Flow out of range.	Specific Requirements 141 and 147
LLLL.		0840-00001-V3	2/1/2010	0.19	Flow out of range.	Specific Requirements 141 and 147
MMMM.		0840-00001-V3	2/3/2010	3.25	Flow out of range.	Specific Requirements 141 and 147
NNNN.		0840-00001-V3	2/15/2010	0.16	Flow out of range.	Specific Requirements 141 and 147
OOOO.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V3	2/24/2010	0.11	Flow out of range.	Specific Requirements 141 and 147
PPPP.		0840-00001-V3	2/28/2010	0.06	Flow out of range.	Specific Requirements 141 and 147
QQQQ.		0840-00001-V3	3/26/2010	0.03	Flow out of range.	Specific Requirements 141 and 147
RRRR.		0840-00001-V3	4/16/2010	0.02	Flow out of range.	Specific Requirements 141 and 147
SSSS.		0840-00001-V4	5/10/2010	0.09	Flow out of range.	Specific Requirements 141 and 147
TTTT.		0840-00001-V4	5/10/2010	0.02	Flow out of range.	Specific Requirements 141 and 147
UUUU.		0840-00001-V4	5/10/2010	0.05	Flow out of range.	Specific Requirements 141 and 147
VVVV		0840-00001-V4	5/11/2010	0.05	Flow out of range due to loss of circulation due to pump shutdown.	Specific Requirements 141 and 147
WWWW.		0840-00001-V4	5/13/2010	0.39	Temperature out of range.	Specific Requirements 141 and 147
XXXX.		0840-00001-V4	5/30/2010	0.12	Flow out of range.	Specific Requirements 141 and 147
YYYY.		0840-00001-V4	6/12/2010	0.41	Temperature out of range.	Specific Requirements 141 and 144
ZZZZ.	2010 Title V Second Semiannual Monitoring Report (3/31/2011)	0840-00001-V4	7/24/2010	0.02	Temperature was out of range.	Specific Requirements 141 and 144
AAAAA.		0840-00001-V4	7/28/2010	0.01	Temperature was out of range due to increase in brine temperature.	Specific Requirements 141 and 144
BBBBBB.		0840-00001-V4	8/3/2010	0.23	Temperature was out of range from decrease in feed.	Specific Requirements 141 and 144
CCCCCC.		0840-00001-V4	8/3/2010	0.16	Temperature was out of range from decrease in feed.	Specific Requirements 141 and 144
DDDDDD.		0840-00001-V4	8/3/2010	0.04	Temperature was out of range.	Specific Requirements 141 and 144
EEEEE		0840-00001-V4	8/3/2010	0.07	Temperature was out of range.	Specific Requirements 141 and 144

	REPORT (date)	PERMIT NUMBER	INCIDENT DATE	DURATION (hours)	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
FFFFF		0840-00001-V4	8/7/2010	0.09	Temperature was out of range.	Specific Requirements 141 and 144
GGGGG.		0840-00001-V4	8/16/2010	0.01	Temperature was out of range.	Specific Requirements 141 and 144
HHHHH.		0840-00001-V4	9/5/2010	0.05	Temperature was out of range.	Specific Requirements 141 and 144

Each failure to maintain the temperature and/or flow for RLP 00008 required for 94.6 percent removal efficiency is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2). The Respondent submitted a permit application dated July 26, 2010, and requested a change to the temperature and flow rate recordkeeping requirements for the emission source 201 G-1113 Unit Process Vent. The Respondent was issued Title V Permit No. 0840-00001-V5 dated October 15, 2012, incorporating the temperature and flow rate requirements.

The tanks listed in the table below are equipped with a closed vent system and a condenser in order to reduce inlet emissions of total organic hazardous air pollutant (HAP) by 95 percent or greater as required by 40 CFR 63.119(e)(1). The Respondent reported the violations of the temperature range set for the condenser as follows:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	DURATION (hours)	REPORTED DEVIATION
A.	2007 Title V Second Quarter Deviation Report (9/14/2007) & 2007 First Semiannual Compliance Report for 40 CFR 63 Subparts F & G (9/14/2007)	0840-00001-V1	Tank 2-CCl_4 Storage Tank (EPN 855B)	4/12/2007-4/19/2007 (108 hours)	Temperature out of range due to FES water leak. Refrigeration system malfunction due to water leak.
B.		0840-00001-V1	Tank 2-CCl_4 Storage Tank (EPN 855B)	4/19/2007-4/23/2007 (120 hours)	Temperature out of range due to Refrigeration system malfunction.
C.	2007 Title V Fourth Quarter Deviation Report (3/26/2008) & 2007 Second Semiannual Compliance Report for 40 CFR 63 Subparts F & G (3/26/2008)	0840-00001-V1	Perchloroethylene Tank (EPN 830)	10/20/2007-10/21/2007 (36 hours)	Temperature out of range for the condenser. Refrigeration system providing inadequate brine to condenser.
D.		0840-00001-V1	Perchloroethylene Tank (EPN 830)	11/1/2007-11/2/2007 (12 hours)	Temperature out of range for the condenser. Refrigeration system providing inadequate brine to condenser.
E.		0840-00001-V1	Perchloroethylene Tank (EPN 830)	11/3/2007-11/4/2007 (12 hours)	Temperature out of range for the condenser. Refrigeration system providing inadequate brine to condenser.
F.		0840-00001-V1	Perchloroethylene Tank (EPN 830)	11/5/2007-11/6/2007 (12 hours)	Temperature out of range for the condenser. Refrigeration system providing inadequate brine to condenser.
G.		0840-00001-V1	Perchloroethylene Tank (EPN 830)	11/21/2007 (12 hours)	Temperature out of range for the condenser. Refrigeration system providing inadequate brine to condenser.
H.	2010 Title V Second Semiannual Monitoring Report (3/31/2011) & 2010 Second Semiannual Compliance Report for 40 CFR 63 Subpart F & G (3/30/2011)	0840-00001-V4	855A Tank 1-Chloroform Storage Tank (EQT 0109)	7/22/2010-7/23/2010 (31 hours)	Condenser was shutdown due to the loss of water supply. Plant utilities were shut down when an expansion joint failed on a vessel resulting in a release to storm water trench.
I.	2011 Title V First Semiannual Monitoring Report (9/30/2011)	0840-00001-V6	855A Tank 1-Chloroform Storage Tank (EQT 0109)	1/14/2011 (2.02 hours)	Chiller temperature was out of range.
J.		0840-00001-V6	855A Tank 1-Chloroform Storage Tank (EQT 0109)	2/12/2011-2/14/2011 (49 hours)	Plant and plant utilities were shutdown due to issues in the wastewater treatment plant.

Each failure to operate the condensers within the temperature range determined to achieve the 95 percent reduction efficiency of HAPs is a violation of 40 CFR 63.120(d)(5), which language has been adopted as a Louisiana regulation in LAC 33:III.5311, and associated permits listed above, LAC 33:III.5109, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Emission Point EQT 0054, 801 HCl Scrubber, is required to maintain ≥ 99 percent reduction efficiency of Hydrochloric acid by maintaining the water flow rate ≥ 5.0 gallons/min as per 40 CFR 63 Subpart NNNNN. The Respondent reported that EQT0054 failed to maintain water flow rate as follows:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	DURATION	REPORTED DEVIATION	REGULATORY or PERMIT REQUIREMENTS
A.	2010 Title V Second Semiannual Monitoring Report (3/31/2011) & 2010 2nd Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (3/30/2011)	0840-00001-V4	801 HCl Scrubber (EQT 0054)	7/22/2010 - 7/23/2010 (8 hours)	Scrubber was shutdown when the plant shutdown due to release that impacted the storm water and process water system.	Specific Requirement 649 40 CFR 63.9000(a) & Specific Requirement 652 40 CFR 63.9000(b)
B.	2011 Title V Second Semiannual Monitoring Report (3/30/2012) & 2011 Second Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (3/23/2012)	0840-00001-V6	801 HCl Scrubber (EQT 0054)	8/20/2011 (2.18 hours)	Water supply to scrubber was interrupted due to plant shutdown and shutdown of plant utilities.	Specific Requirement 615 40 CFR 63.9000(a) & Specific Requirement 617 40 CFR 63.9000(b)

Each failure to maintain water flow rate for EQT0054 is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent reported the following violations from permitted operating parameters:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE/S (duration)	OPERATING PARAMETER	POLLUTANTS INVOLVED	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
A.	2008 Title V Third Quarter Deviation Report (12/29/2008)	0840-00001-V2	501 CaCl2 Lime Silo Baghouse (EQT 0050)	7/1/2008	Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.	PM	Opacity reading of 25%.	Specific Requirement 702 LAC 33:III.1311.C
B.	2008 Title V Third Quarter Deviation Report (12/29/2008)	0840-00001-V2	502 CaCl2 Plant Vent Scrubber (EQT 0051)	7/9/2008	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	VOC	Flow out of range due to pluggage.	Specific Requirement 711
C.	2010 Title V Second Semiannual Monitoring Report (3/31/2011)	0840-00001-V4	503 G03 ST HCl Scrubber (EQT 0052)	7/22/2010 - 7/23/2010 (34 hours)	Maintain water flow at ≥ 5.0 gallons/minute.	HCl	Scrubber was shutdown when the plant shutdown due to release that impacted the storm water and process water.	Specific Requirement 637
D.	2011 Title V First Semiannual Monitoring Report (9/30/2011)	0840-00001-V6	502 CaCl2 Plant Vent Scrubber (EQT 0051)	3/25/2011 (3:56 hours)	Maintain water flow to scrubber.	HF	Upon restart of production unit, water flow did not restart and alarm did not sound.	Specific Requirement 603

Each non-compliance of the permitted operating parameters is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent reported the following violations from monitoring requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	TIME PERIOD (duration or # of events)	MONITORING PARAMETER	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
A.	2007 Title V First Quarter Deviation Report (4/30/2007)	0840-00001-V1	Tank 1-Chloroform Storage Tank (EPN 855A)	3/31/2007 - 4/1/2007 (12 hours)	Monitor and record temperature.	No record of temperature for the condenser.	Specific Condition 1 (Table 3) 40 CFR 63.123(f)(1)
B.	2007 Title V Second Quarter Deviation Report (9/14/2007)	0840-00001-V1	Air Compressors (EPNs 1201A, 1202, 1203, 1209,1211, 1215) Diesel Pumps (EPN 1205,1210, 1213 Generators (EPNs 1206, 1207, 1208, 1212) Portable Light Set (EPN 1214)	Week of 4/1/2007 (1 event)	Weekly visual emission check and semiannual inspection as per Part 70 Specific Condition 5.	Missing Record	Specific Conditions 1 & 5 (Table 3) LAC 33:III.1311
C.	2007 Title V Second Quarter Deviation Report (9/14/2007)	0840-00001-V1	Vent Scrubber (EPN 701)	4/26/2007 (1 event)	Monitor and record water flow rates twice per loading.	Incomplete record (missing second record)	Specific Condition 1 (Table 3)
D.	2007 Title V Second Quarter Deviation Report (9/14/2007)	0840-00001-V1	Vent Scrubber (EPN 701)	4/27/2007 (1 event)	Monitor and record water flow rates twice per loading.	Incomplete record (missing second record)	Specific Condition 1 (Table 3)
E.		0840-00001-V1	Vent Scrubber (EPN 701)	5/3/2007 (1 event)	Monitor and record water flow rates twice per loading.	Incomplete record (missing pressure reading)	Specific Condition 1 (Table 3)
F.	2008 Title V First Quarter Deviation Report (6/30/2008)	0840-0001-V1	Zinc Blow Plot and Unloading System Baghouse (EPN 202)	1/31/2008 (1 event)	Visually inspect the baghouse for the presence of visible emissions on a daily basis when storage silo is being loaded.	No record of daily opacity inspection.	Specific Conditions 1 & 2 (Table 3) LAC 33:III.1311
G.	2008 Title V Second Quarter Deviation Report (9/30/2008)	0840-00001-V1	Perchloroethylene Tank (EPN 830)	4/10/2008	Monitoring, Reporting, & Recordkeeping required by 40 CFR Subpart F and G	Incomplete Record.	Specific Condition 1 (Table 3) 40 CFR 63.123(f)(1)
H.		0840-00001-V1	Tank 1-Chloroform Storage Tank (EPN 855A)	4/10/2008	Monitoring, Reporting, & Recordkeeping required by 40 CFR Subpart F and G	Incomplete Record.	Specific Condition 1 (Table 3) 40 CFR 63.123(f)(1)
I.		0840-00001-V2	502 $CaCl_2$ Plant Vent Scrubber (EQT 0051)	5/12/2008 - 5/22/2008 (120 hours)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	No record of adequate flow to scrubber.	Specific Requirement 714
J.	2008 Title V Third Quarter Deviation Report (12/29/2008)	0840-00001-V2	502 CaCl2 Plant Vent Scrubber (EQT 0051)	8/8/2008 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Flow not recorded.	Specific Requirement 714
K.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	1/14/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Failure to record data.	Specific Requirement 631
L.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	1/22/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Failure to record data.	Specific Requirement 631

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	TIME PERIOD (duration or # of events)	MONITORING PARAMETER	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
M.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	1/23/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Failure to record data.	Specific Requirement 631
N.		0840-00001-V3	701 HF Storage Tanks Scrubber (EQT 0053)	1/31/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Flow meter malfunction. Record indicated adequate air pressure and water flow to ensure control of emissions.	Specific Requirement 643
O.		0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	3/20/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Failure to record data.	Specific Requirement 631
P.		0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	3/21/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Failure to record data.	Specific Requirement 631
Q.		0840-00001-V4	502 CaCl2 Plant Vent Scrubber (EQT 0051)	5/9/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Failure to record data.	Specific Requirement 631
R.		0840-00001-V4	701 HF Storage Tanks Scrubber (EQT 0053)	5/23/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	Incomplete record due to employee not completing required record.	Specific Requirement 643
S.		0840-00001-V4	701 HF Storage Tanks Scrubber (EQT 0053)	6/4/2010	Water flow indication recordkeeping by electronic or hard copy once every four hours.	No monitoring record was recorded by employee.	Specific Requirement 643
T.	2010 Title V Second Semiannual Monitoring Report (3/31/2011)	0840-00001-V4	701 HF Storage Tanks Scrubber (EQT 0053)	7/7/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	No monitoring flow record was recorded by employee for second reading during unloading of the railcar.	Specific Requirement 643
U.		0840-00001-V4	701 HF Storage Tanks Scrubber (EQT 0053)	7/8/2010 (1 event)	Water flow indication recordkeeping by electronic or hard copy once every four hours.	No monitoring flow record was recorded by employee during railcar unloading.	Specific Requirement 643
V.	2011 Title V First Semiannual Monitoring Report (9/30/2011)	0840-00001-V6	203 Zinc Day Tank Baghouse (EQT 0043)	6/30/2011 (1 event)	Record visible emission inspection.	Failure to record daily visible emissions inspections.	Specific Requirement 11
W.	2011 Title V Second Semiannual Monitoring Report (3/31/2012)	0840-00001-V6	701 HF Storage Tanks Scrubber (EQT 0053)	11/4/2011 (1 event)	Flow rate recordkeeping by electronic or hard copy twice per rail car unloading.	Failure to record the second flow.	Specific Requirement 613
X.	2012 Title V First Semiannual Monitoring Report (9/28/2012)	0840-00001-V7	701 HF Storage Tanks Scrubber (EQT 0053)	2/16/2012 (1 event)	Flow rate recordkeeping by electronic or hard copy twice per rail car unloading.	Failure to record second water flow to scrubber.	Specific Requirement 315

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	TIME PERIOD (duration or # of events)	MONITORING PARAMETER	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
Y.		0840-00001-V7	701 HF Storage Tanks Scrubber (EQT 0053)	6/12/2012 (1 event)	Flow rate recordkeeping by electronic or hard copy twice per rail car unloading.	Failure to record second water flow to scrubber.	Specific Requirement 315
Z.		0840-00001-V7	701 HF Storage Tanks Scrubber (EQT 0053)	6/19/2012 (1 event)	Flow rate recordkeeping by electronic or hard copy twice per rail car unloading.	Failure to record second water flow to scrubber.	Specific Requirement 315

Each failure to monitor as required is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2)

The Respondent reported the following violations from fugitive emission monitoring requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	TIME PERIOD	REQUIREMENT	REPORTED VIOLATION	REGULATORY or PERMIT REQUIREMENTS
A.	2007 Title V First Quarter Deviation Report (4/30/2007)	0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 1/27/2007	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
B.	2007 Title V Second Quarter Deviation Report (9/14/2007)	0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 5/21/2007	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
C.	2007 Title V Second Quarter Deviation Report (9/14/2007)	0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 6/24/2007	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
D.	2007 Title V Third Quarter Deviation Report (12/21/2007)	0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 7/15/2007	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
E.	2007 Title V Fourth Quarter Deviation Report (3/26/2008)	0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 10/28/2007	VOC	Date missing from record of inspection.	Specific Condition 4 40 CFR 63.163(b)(3)
F.		0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 12/16/2007	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
G.		0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 12/23/2007	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
H.	2008 Title V First Quarter Deviation Report (6/30/2008)	0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 1/6/2008	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
I.		0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 3/16/2008	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
J.	2008 Title V Second Quarter Deviation Report (9/30/2008)	0840-00001-V1	General Plant Fugitive Emissions (EPN 1013)	Week of 4/6/2008	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 4 40 CFR 63.163(b)(3)
K.		0840-00001-V2	1013 General Plant Fugitive Emissions (FUG 0002)	Week of 5/18/2008	VOC	No record of weekly visible inspection of 11 pumps.	Specific Requirement 928 40 CFR 63.163(b)(3)

	REPORT (Date)	PERMIT NUMBER	EMISSION POINT	TIME PERIOD	REQUIREMENT	REPORTED VIOLATION	REGULATORY OR PERMIT REQUIREMENTS
L.	2008 Title V Third Quarter Deviation Report (12/29/2008)	0840-00001-V2	1013 General Plant Fugitive Emissions (FUG 0002)	Week of 7/27/2008	VOC	No record of weekly visible inspection of 11 pumps.	Specific Requirement 928 40 CFR 63.163(b)(3)
M.		0840-00001-V2	1013 General Plant Fugitive Emissions (FUG 0002)	Week of 9/7/2008	VOC	No record of weekly visible inspection of 11 pumps.	Specific Requirement 928 40 CFR 63.163(b)(3)
N.		0840-00001-V2	1013 General Plant Fugitive Emissions (FUG 0002)	Week of 9/14/2008	VOC	No record of weekly visible inspection of 11 pumps.	Specific Requirement 928 40 CFR 63.163(b)(3)
O.	2009 Title V Second Quarter Deviation Report (9/24/2009)	0840-00001-V2	1013 General Plant Fugitive Emissions (FUG 0002)	Week of 4/12/2009	VOC	No record of weekly visual inspection of HON pumps.	Specific Requirement 928 40 CFR 63.163(b)(3)
P.	2009 Title V Fourth Quarter Deviation Report (3/31/2010)	0840-00001-V3	1013 General Plant Fugitive Emissions (FUG 0002)	Week of 11/22/2009	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 846 40 CFR 63.163(b)(3)
Q.		0840-00001-V3	1013 General Plant Fugitive Emissions (FUG 0002)	Week of 12/21/2009	VOC	No record of weekly visible inspection of 11 pumps.	Specific Condition 846 40 CFR 63.163(b)(3)
R.	2010 Title V Second Semiannual Monitoring Report (3/31/2011)	0840-00001-V4	Relief Valve on 822 Tank No. 148 (EQT 0081)	Third and Fourth Quarter	VOC	Monitoring program did not address the quarterly monitoring requirement for one pressure/vacuum relief valve to pressure tank.	Specific Requirement 730 40 CFR 63.119(g)(5)(i)
S.	2011 Title V Second Semiannual Monitoring Report (3/31/2012)	0840-00001-V6	104, 305, 1013, 307 Fugitive Emissions (FUG 0003; FUG 0008; FUG 0001; FUG 0010)	Week of 7/10/2011	Organic HAP	No record of weekly visible inspection of 9 HON pumps.	Specific Requirements 159,810,995, & 1183 40 CFR 63.163(b)(3)
T.		0840-00001-V6	104, 305, 1013, 307 Fugitive Emissions (FUG 0003; FUG 0008; FUG 0001; FUG 0010)	Week of 8/14/2011	Organic HAP	No record of weekly visible inspection of 9 HON pumps.	Specific Requirements 159,810,995, & 1183 40 CFR 63.163(b)(3)
U.		0840-00001-V6	104, 305, 1013, 307 Fugitive Emissions (FUG 0003; FUG 0008; FUG 0001; FUG 0010)	Week of 10/09/2011	Organic HAP	No record of weekly visible inspection of 9 HON pumps.	Specific Requirements 159,810,995, & 1183 40 CFR 63.163(b)(3)

The failure to monitor each component is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, LAC 33:III.2122.C.3, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent failed to meet the following reporting requirements:

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
A.	2009, 2010, 2011, and 2012 Semiannual Compliance Reports for 40 CFR 60 Subpart NNN	0840-00001-V3	Submit report: Due semiannually. Submit initial report within 6 months after the initial start-up date. Include the information outlined in 40 CFR 60.665(l)(1) through (l)(7).	Required 2009, 2010, 2011, and first half of 2012 semiannual reports	Not Submitted	Specific Requirement 1443
		0840-00001-V4				Specific Requirement 1443
		0840-00001-V5				Specific Requirement 1443
		0840-00001-V6				Specific Requirement 1375
		0840-00001-V7				Specific Requirements 931 and 937
B.	2008, 2009, 2010, 2011, and 2012 Semiannual Compliance Reports for 40 CFR 63 Subpart SS	0840-00001-V2	Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7).	Required 2008, 2009, 2010, 2011, and first half of 2012 semiannual reports	Not Submitted	Specific Requirements 152, 172, and 771
		0840-00001-V3				Specific Requirements 136 and 691
		0840-00001-V4				Specific Requirements 136 and 691
		0840-00001-V5				Specific Requirements 135 and 693
		0840-00001-V6				Specific Requirements 136 and 657
		0840-00001-V7				Specific Requirements 121, 357, 704
C.	2008, 2009, 2010, 2011 Scrubber Specific Requirement Report	0840-00001-V2	Submit Report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified.	March 31, 2009	Not Submitted	Specific Requirements 163, 183, 712, 719, and 727
		0840-00001-V3		March 31, 2010		Specific Requirements 143, 630, 639, and 647
		0840-00001-V4		March 31, 2011		Specific Requirements 143, 630, 639, and 647
		0840-00001-V5		March 31, 2011		Specific Requirements 145, 629, 637, and 642
		0840-00001-V6		March 31, 2012		Specific Requirements 146, 601, 606, 612
		0840-00001-V7		March 31, 2012		Specific Requirements 132, 303, 308, and 314
D.	*2008, 2009, 2010, 2011 Cylinder Specific Requirement Report*	0840-00001-V2	Due annually, by the 31st of March. Report the number of cylinders painted for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.	March 31, 2009	Not Submitted	Specific Requirement 1623
		0840-00001-V3		March 31, 2010		Specific Requirements 945 and 1455
		0840-00001-V4		March 31, 2011		Specific Requirements 945 and 1455
		0840-0001-V5		March 31, 2011		Specific Requirements 945 and 1455
		0840-00001-V6		March 31, 2012		Specific Requirements 905 and 1383
		0840-00001-V7		March 31, 2012		Specific Requirement 945

	REPORT (Date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY OR PERMIT REQUIREMENTS
E.	*2008, 2009, 2010, 2011 Specific Requirement Wastewater Throughput Report*	0840-00001-V2	Due annually, by the 31st of March. Report the total treated wastewater throughput of the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.	March 31, 2009	Not Submitted	Specific Requirement 1626
		0840-00001-V3		March 31, 2010		Specific Requirements 951 and 1458
		0840-00001-V4		March 31, 2011		Specific Requirements 951 and 1458
		0840-00001-V5		March 31, 2011		Specific Requirements 951 and 1458
		0840-00001-V6		March 31, 2012		Specific Requirements 911 and 1386
		0840-00001-V7		March 31, 2012		Specific Requirements 629 and 949
F.	2008 Specific Requirement Tank Report	0840-00001-V2	Due annually, by the 31st of March. Report the total tank purges for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.	March 31, 2009	Not Submitted	Specific Requirement 1631
		0840-00001-V3		March 31, 2010		Specific Requirements 954 and 1462
		0840-00001-V4		March 31, 2011		Specific Requirements 954 and 1462
		0840-00001-V5		March 31, 2011		Specific Requirements 954 and 1462
		0840-00001-V6		March 31, 2012		Specific Requirements 914 and 1390
		0840-00001-V7		March 31, 2012		Specific Requirements 633 and 951

Each failure to submit the report is a violation of applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent reported the following deviations:

	REPORT	PERMIT NO.	EMISSION POINT	INCIDENT DATE(S) (duration)	PERMITTED PARAMETER	REPORTED DEVIATION
A.	2007 Title V Second Quarter Deviation Report (9/14/2007)	0840-00001-V1	801 HCl Scrubber (EQT 0054)	6/27/2007 (12 hours)	Maintain water flow >=5.0gpm.	No flow due to maintenance on HCL scrubber.
B.	2007 Title V Third Quarter Deviation Report (12/21/2007) & 2007 Second Semiannual Compliance Report for 40 CFR 63 Subparts F & G (3/26/2008)	0840-00001-V1	Tank 1-Chloroform Storage Tank (EPN 855A)	8/2/2007 (12 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range for the condenser due to Refrigeration system malfunction. System repaired and brought back online.
C.	2008 Title V Second Quarter Deviation Report (9/30/2008) & 2008 First Semiannual Compliance Report for 40 CFR 63 Subpart F & G (9/30/2008)	0840-00001-V1	Perchloroethylene Tank (EPN 830)	5/7/2008 - 5/8/2008 (17.75 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range for the condenser. Refrigeration system down due to planned Power Outage.
D.		0840-00001-V1	Tank 1-Chloroform Storage Tank (EPN 855A)	5/7/2008 - 5/8/2008 (17.75 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range for the condenser. Refrigeration system down due to planned power outage.

	REPORT	PERMIT NO.	EMISSION POINT	INCIDENT DATE(S) (duration)	PERMITTED PARAMETER	REPORTED DEVIATION
E.	2008 Title V Second Quarter Deviation Report (9/30/2008)	0840-00001-V2	503 G03 ST HCl Scrubber (EQT 0052)	5/24/2008 (12 hours)	Maintain water flow ≥ 5.0 gpm.	Flow out of range due to unit shut down.
F.	2008 Title V Second Quarter Deviation Report (9/30/2008)	0840-00001-V2	801 HCl Scrubber (EQT 0054)	5/24/2008 (12 hours)	Maintain water flow ≥ 5.0 gpm.	Flow out of range due to unit shut down.
G.		0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	6/6/2008 (4.78 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range due to FES level transmitter malfunction.
H.		0840-00001-V2	201 G-1113 Unit Process Vent (RLP 00008)	6/13/2008 - 6/20/2008 (139.67 hours)	Compounds (VOCs) at 94.6% by maintaining the maximum temperature of the inlet methanol stream at 50°F and the minimum chilled methanol flow rate at 1.5 gallons per minute.	Temperature and flow out of range due to Carrier malfunction/shut down.
I.	2008 Title V Third Quarter Deviation Report (12/29/2008)	0840-00001-V2	502 CaCl2 Plant Vent Scrubber (EQT 0051)	7/15/2008 (120 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
J.		0840-00001-V2	201 G-1113 Unit Process Vent (RLP 00008)	8/14/2008 – 8/15/2008 (21 hours)	Compounds (VOCs) at 94.6% by maintaining the maximum temperature of the inlet methanol stream at 50°F and the minimum chilled methanol flow rate at 1.5 gallons per minute.	Temperature and flow out of range due to Carrier malfunction/shut down.
K.	2008 Title V Third Quarter Deviation Report (12/29/2008) & 2008 Second Semiannual Compliance Report for 40 CFR 63 Subpart F & G (3/31/2009)	0840-00001-V2	Perchloroethylene Tank (EPN 830)	9/8/2008 (3.6 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range due to power outage. Refrigeration system providing inadequate brine to condenser.
L.	2008 Title V Fourth Quarter Deviation Report (3/31/2009)	0840-00001-V2	502 CaCl2 Plant Vent Scrubber (EQT 0051)	10/25/2008 - 10/27/2008 (58 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
M.		0840-00001-V2	502 CaCl2 Plant Vent Scrubber (EQT 0051)	11/22/2008 (5.43 hours) (58 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
N.		0840-00001-V2	502 CaCl2 Plant Vent Scrubber (EQT 0051)	11/25/2008 - 11/25/2008 (8.92 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
O.	2009 First Semiannual Compliance Report for 40 CFR 63 Subpart F & G (9/24/2009)	0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	1/8/2009 - 1/9/2009 (23.4 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser temperature out of range due to plant power outage and maintenance on FES Machine.
P.		0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	2/23/2009 (12 minutes)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser temperature out of range due to plant power outage and maintenance on FES Machine.

	REPORT	PERMIT NO.	EMISSION POINT	INCIDENT DATE(S) (Duration)	PERMITTED PARAMETER	REPORTED DEVIATION
Q.	2009 First Semiannual Compliance Report for 40 CFR 63 Subpart F & G (9/24/2009)	0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	2/23/2009 (46 minutes)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser temperature out of range due to plant power outage and maintenance on FES Machine.
R.		0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	2/24/2009 - 2/28/2009 (89.57 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser temperature out of range due to plant power outage and maintenance on FES Machine.
S.		0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	2/28/2009 (6.73 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser temperature out of range due to plant power outage and maintenance on FES Machine.
T.		0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	2/28/2009 (6 minutes)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser temperature out of range due to plant power outage and maintenance on FES Machine.
U.		0840-00001-V2	855A Tank 1-Chloroform Storage Tank (EQT 0109)	2/28/2009 (44 minutes)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser temperature out of range due to plant power outage and maintenance on FES Machine.
V.	2009 Title V Second Quarter Deviation Report (9/24/2009)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	4/1/2009 - 4/8/2009 (188.92 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
W.	2009 Title V Second Quarter Deviation Report (9/24/2009)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	6/23/2009 - 6/30/2009 (178 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
X.	2009 Title V Third Quarter Deviation Report (12/23/2009)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	7/1/2009 - 7/7/2009 (162 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	No flow due to unit shut down.
Y.	2009 Title V Fourth Quarter Deviation Report (3/31/2010)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	11/5/2009 (2.58 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit down due to fire water system failure.
Z.		0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	11/25/2009 (8.92 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
AA.		0840-00001-V3	855B Tank 2 CCl4 Storage Tank (EQT 0110)	12/20/2009 (4.67 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range; Plant power failure

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BB.	2009 Second Semiannual Compliance Report for 40 CFR 63 Subpart F & G (3/8/2010)	0840-00001-V3	855A Tank 1-Chloroform Storage Tank (EQT 0109)	12/20/2009 - 12/21/2009 (12 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Refrigeration system providing inadequate brine to condenser due to power failure.
CC.	2009 Title V Fourth Quarter Deviation Report (3/31/2010)	0840-00001-V3	502 CaCl2 Plant Vent Scrubber (EQT 0051)	12/21/2009 - 12/31/2009 (250 hours)	Maintain efficiency of the scrubber by maintaining a water flow to the scrubber.	Flow out of range due to unit shut down.
DD.	2010 Title V First Semiannual Monitoring Report (9/30/2010) & 2010 First Semiannual Compliance Report for 40 CFR 63 Subpart F & G (9/28/2010)	0840-00001-V3	855A Tank 1-Chloroform Storage Tank (EQT 0109)	1/2/2010 - 1/3/2010 (20 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range. Condenser malfunction-followed SSM.
EE.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V3	503 G03 ST HCl Scrubber (EQT 0052)	1/9/2010 - 1/13/2010 (91:38 hours)	Maintain water flow ≥ 5.0 gpm..	Scrubber down due to line freeze and rupture of water line.
FF.	2010 Title V First Semiannual Monitoring Report (9/30/2010) & 2010 First Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (9/30/2010)	0840-00001-V3	801 HCl Scrubber (EQT 0054)	1/10/2010 - 1/18/2010 (204 hours)	Maintain water flow ≥ 5.0 gpm.	Scrubber down due to line freeze and rupture of water line.
GG.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V3	503 G03 ST HCl Scrubber (EQT 0052)	1/27/2010 - 1/29/2010 (48 hours)	Maintain water flow ≥ 5.0 gpm.	Flow out of range during plant shutdown for planned power outage.
HH.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V4	201 G-1113 Unit Process Vent (RLP 00008)	6/7/2010 (2.59 hours)	Compounds (VOCs) at 94.6% by maintaining the maximum temperature of the inlet methanol stream at 50°F and the minimum chilled methanol flow rate at 1.5 gallons per minute.	Flow out of range due to Power failure
II.	2010 Title V First Semiannual Monitoring Report (9/30/2010) & 2010 First Semiannual Compliance Report for 40 CFR 63 Subpart F & G (9/28/2010)	0840-00001-V4	855A Tank 1-Chloroform Storage Tank (EQT 0109)	6/7/2010 (2.40 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range due to plant power failure. SSM followed.
JJ.		0840-00001-V4	855A Tank 1-Chloroform Storage Tank (EQT 0109)	6/20/2010 - 6/22/2010 (52.03 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range. Condenser malfunction and was shutdown.
KK.	2010 Title V First Semiannual Monitoring Report (9/30/2010)	0840-00001-V4	503 G03 ST HCl Scrubber (EQT 0052)	6/25/2010 - 6/26/2010 (56 hours)	Maintain water flow.	Flow out of range during plant shutdown.

	REPORT	PERMIT NO.	EMISSION POINT	INCIDENT DATE(S) (Duration)	PERMITTED PARAMETER	REPORTED DEVIATION
LL.	2010 Title V First Semiannual Monitoring Report (9/30/2010) & 2010 First Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (9/30/2010)	0840-00001-V4	801 HCl Scrubber (EQT 0054)	6/25/2010 - 6/26/2010 (37.23 hours)	Maintain water flow ≥ 5.0 gpm..	Scrubber was shutdown due to a plant shutdown.
MM.	2010 Title V First Semiannual Monitoring Report (9/30/2010) & 2010 First Semiannual Compliance Report for 40 CFR 63 Subpart F & G (9/28/2010)	0840-00001-V4	855A Tank 1-Chloroform Storage Tank (EQT 0109)	6/25/2010-6/26/2010 (38.16 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Temperature out of range for the condenser due to a utilities shutdown for wastewater issues within the plant.
NN.	2010 Title V Second Semiannual Monitoring Report (3/31/2011) & 2010 Second Semiannual Compliance Report for 40 CFR 63 Subpart F & G (3/30/2011)	0840-00001-V4	855A Tank 1-Chloroform Storage Tank (EQT 0109)	7/16/2010-7/19/2010 (66 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser was shutdown due to the loss of water supply to the plant when the well water main header line failed. The failed section of line was removed and replaced.
OO.	2010 Title V Second Semiannual Monitoring Report (3/31/2011) & 2010 2nd Semiannual Compliance Report for 40 CFR 63 Subpart FFFF (3/30/2011)	0840-00001-V4	801 HCl Scrubber (EQT 0054)	7/16/2010 - 7/18/2010 (30 hours)	Maintain water flow ≥ 5.0 gpm.	Scrubber down due to loss of water supply from pipe failure on the main well water header.
PP.	2010 Title V Second Semiannual Monitoring Report (3/31/2011)	0840-00001-V4	503 G03 ST HCl Scrubber (EQT 0052)	7/16/2010 - 7/18/2010 (46 hours)	Maintain water flow ≥ 5.0 gpm..	Scrubber was shutdown due to loss of water supply to the scrubber when the main well header supply line failed.
QQ.	2010 Title V Second Semiannual Monitoring Report (3/31/2011) & 2010 Second Semiannual Compliance Report for 40 CFR 63 Subpart F & G (3/30/2011)	0840-00001-V4	855A Tank 1-Chloroform Storage Tank (EQT 0109)	11/22/2010 (2 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser was shutdown due to plant power failure.
RR.	2011 Title V First Semiannual Monitoring Report (9/30/2011)	0840-00001-V6	855A Tank 1-Chloroform Storage Tank (EQT 0109)	1/4/2011 (3.14 hours)	Ensure > 95 percent control efficiency as per 40 CFR 63.120(d)(5) by maintaining condenser temperature.	Condenser was shut-down due to plant power failure.

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 SIXTY THREE THOUSAND AND NO/100 DOLLARS ($63,000.00) of which One Thousand One Hundred Fifty-Nine and 38/100 Dollars ($1,159.38) 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 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 East 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.

HONEYWELL INTERNATIONAL, INC.

BY: _____
(Signature)

_____
(Printed)

TITLE: _____

THUS DONE AND SIGNED in duplicate original before me this _____ day of _____, 20 _____, at _____.

_____
NOTARY PUBLIC (ID #_____)

_____
(stamped or printed)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Peggy M. Hatch Secretary

BY: _____
D. Chance McNeely, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this _____ day of _____, 20_____, at Baton Rouge, Louisiana.

_____
NOTARY PUBLIC (ID # _____)

_____
(stamped or printed)

Approved: _____
D. Chance McNeely, Assistant Secretary