

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

CAMERON INTERNATIONAL
CORPORATION

AI # 5025

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

* Settlement Tracking No.
* SA-MM-21-0066
*
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* Enforcement Tracking No.
* MM-CN-19-00224
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SETTLEMENT

The following Settlement is hereby agreed to between Cameron International Corporation (“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 a facility located in Ville Platte, Evangeline Parish, Louisiana (“the Facility”).

II

On June 26, 2019, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. MM-CN-19-00224 (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 TEN THOUSAND SIX HUNDRED THIRTEEN AND 21/100 DOLLARS (\$10,613.21), of which One Thousand Four Hundred Thirteen and 21/100 Dollars (\$1,413.21) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

V

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

VI

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

VII

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

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

VIII

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

IX

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

CAMERON INTERNATIONAL CORPORATION

BY: Winder
(Signature)

William Footnot
(Printed)

TITLE: Plant Manager

THUS DONE AND SIGNED in duplicate original before me this 24th day of February, 20 22, at Evangeline Parish.

Abby Bergeron
NOTARY PUBLIC (ID # 83724)

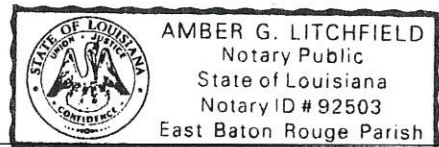
Abby Bergeron
(stamped or printed)

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

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

THUS DONE AND SIGNED in duplicate original before me this 11th day of May, 20 22, at Baton Rouge, Louisiana.

[Signature]
NOTARY PUBLIC (ID # 92503)



(stamped or printed)

Approved: [Signature]
Lourdes Iturralde, Assistant Secretary



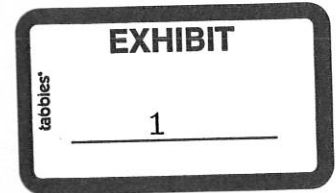
JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL ASSESSMENT

June 26, 2019



CERTIFIED MAIL (7017 2400 0000 7557 2654)
RETURN RECEIPT REQUESTED

CAMERON INTERNATIONAL CORPORATION
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Drive
Baton Rouge, LA 70816

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. MM-CN-19-00224
AGENCY INTEREST NO. 5025**

Dear Sir/Madam:

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 **CAMERON INTERNATIONAL CORPORATION (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 Amanda Marshall at (225) 219-3095 or Amanda.Marshall@la.gov.

Sincerely,

Celena J. Cage
Administrator
Enforcement Division

CJC/ACM/jdd
Alt ID No. LAD980868509; 0920-00011
Attachment

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

IN THE MATTER OF	*	
	*	
CAMERON INTERNATIONAL CORPORATION	*	ENFORCEMENT TRACKING NO.
EVANGELINE PARISH	*	
ALT ID NO. LAD980868509; 0920-00011	*	MM-CN-19-00224
	*	
	*	AGENCY INTEREST NO.
	*	
PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT, La. R.S. 30:2001, ET SEQ.	*	5025
	*	

CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

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

FINDINGS OF FACT

I.

The Respondent owns and/or operates Cameron International Corporation located at 257 Holloway Boulevard in Ville Platte, Evangeline Parish, Louisiana. The Respondent operates under EPA ID number LAD980868509 and notified the Department as a large quantity generator of hazardous waste with the following hazardous waste codes: D001, D002, D007, D008, D011, D035, F003, and F005. The Respondent operates or has operated under Title V Air Permit No. 0920-00011-V0 issued on April 17, 2018 and Minor Source Air Permit No. 0920-00011-05 issued on February 8, 2013.

II.

On or about November 7, 2018, the Department conducted an inspection at the above referenced facility to determine the degree of compliance with the Act and the supporting Regulations. As a result of

this inspection, a Warning Letter was issued to the Respondent on or about March 13, 2019. Responses to the Warning Letter were received by the Department from a representative of the Respondent on or about April 30, 2019, June 11, 2019, and June 19, 2019. While the investigation by the Department is not yet complete, the following violations were noted during the course of the inspection:

- A. The Respondent failed to determine if solid wastes generated at the facility were hazardous wastes, in violation of LAC 33:V.1103.B. Specifically, the Respondent failed to perform a hazardous waste determination on the following wastes:
 - i. Rags dipped in xylene are used to clean valves before painting. At the time of the November 7, 2018 inspection, a few xylene-soaked waste rags (D001, F003) were being disposed of in an open general solid waste container after use. The Respondent failed to make a proper hazardous waste determination after the xylene waste was generated. A representative of the Respondent stated that normal practice is to have the rags collected and recycled by Absorbent Recycling. In a response to the Warning Letter received by the Department from a representative of the Respondent on or about April 30, 2019, a representative stated that xylene is no longer utilized to wipe the valves in the cleaning process. In addition, documentation was provided stating the cleaning rags are no longer discarded, but are instead sent to Cintas for laundering and then reused.
 - ii. Paint booth filters saturated with paint are removed from the paint booth and allowed to dry prior to disposal. A representative of the Respondent stated during the November 7, 2018 inspection that a hazardous waste determination was performed on the spent filters after they were allowed to dry. The waste profiles on the spent paint booth filters determined them to be non-hazardous. The hazardous waste determination was not performed at the point of generation. In a response to the Warning Letter received by the Department from a representative of the Respondent on or about April 30, 2019, a representative stated that the practice of removing the paint booth filters to allow them to dry was halted immediately after the inspection. A copy of the results of a TCLP analysis run on samples taken from paint booth filters was provided to the Department in this response. An additional response provided to the Department by a representative of the Respondent on June 11, 2019,

contained documentation of employee training conducted on November 12, 2018 regarding cleaning procedures for valves and paint guns.

- B. The Respondent treated and/or disposed of regulated hazardous waste without a permit or other authorization, in violation of LAC 33:V.303.B. Specifically, paint booth filters saturated with paint waste are allowed to dry prior to disposal. Based on information in the Safety Data Sheet for the paint used at the facility, the paint waste is classified as a characteristic hazardous waste for ignitability (D001). The process of allowing hazardous paint waste to dry upon paint booth filters constitutes treatment of a hazardous waste. In a response to the Warning Letter received by the Department from a representative of the Respondent on or about April 30, 2019, a representative stated that the practice of removing the paint booth filters to allow them to dry was halted immediately after the inspection.
- C. The Respondent failed to label or mark clearly universal waste batteries or a container in which the batteries are contained with any of the following phrases: "Universal Waste—Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)," in violation of LAC 33:V.3823.A.1. Specifically, at the time of the November 7, 2018 inspection, four (4) universal waste batteries were being stored in the hazardous waste storage building. The universal waste batteries were not labeled. In a response to the Warning Letter received by the Department from a representative of the Respondent on or about April 30, 2019, a representative stated the universal waste containers are now labeled as required, and the universal waste storage area has been added to the routine inspection checklist to confirm labeling. In an additional response provided to the Department by a representative of the Respondent on June 11, 2019, photographs were provided showing waste batteries are now individually labeled "Universal Waste – Battery."
- D. The Respondent failed to label universal waste electronics, or a container in which the electronics are contained, or each electronic device, package, or pallet containing universal waste electronics with any one of the following phrases: "Universal Waste—Electronics," or "Waste Electronics," or "Used Electronics," in violation of LAC 33:V.3823.A.7. Specifically, at the time of the November 7, 2018 inspection, waste computer parts were being stored in the hazardous waste storage building. The universal waste electronics were not labeled. In a response to the Warning Letter

received by the Department from a representative of the Respondent on or about April 30, 2019, a representative stated the universal waste containers are now labeled as required, and the universal waste storage area has been added to the routine inspection checklist to confirm labeling. In an additional response provided to the Department by a representative of the Respondent on June 11, 2019, photographs were provided showing waste electronics are kept in a container labeled "Universal Waste – Electronics."

- E. The Respondent failed to submit an updated HW-1 notification form within seven (7) days of changes to information provided on the previous notification, in violation of LAC 33:V.1105.B. Specifically, the hazardous waste code D039 was listed on a Hazardous Waste Manifest but had not been indicated on the HW-1 notification dated June 28, 2018. In response to the November 7, 2018 inspection, a representative of the Respondent submitted an updated HW-1 notification form to the Department on or about November 21, 2018, which notified the Department of the additional waste code and changed the facility's generator status to small quantity generator. This updated HW-1 form was received by the Department on or about November 27, 2018.
- F. The Respondent allowed containers consisting of materials containing volatile organic compounds (VOCs) to be left open and its contents to evaporate to the atmosphere. At Paint Booth # 2, there was an open 5-gallon plastic container with xylene. The container was not actively being used and was left open, allowing VOCs to evaporate. At Paint Booth # 2, the painter used two (2) paint guns and stored one (1) in a container of xylene to keep it clean. At Paint Booth # 4, there was an open 5-gallon plastic container with xylene. The container was not actively being used and was left open, allowing VOCs to evaporate. At Paint Booth # 4, the open container of xylene was used to clean the valves prior to painting the valves. Each failure to properly close containers of VOCs is a violation of LAC 33:III.2113.A.2, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). In correspondence dated April 30, 2019, the Respondent stated that a paint gun cleaning station had been purchased. Pictures were provided that showed the system was installed. The Respondent reported this station has a locking lid and provides better control of the cleaning process. In correspondence dated June 11, 2019, the Respondent provided pictures of the containers at each paint booth. Locking lids

had been installed on the containers and they were closed. Employees received training on November 12 and November 16, 2018 on empty paint cans, cleaning guns, cleaning valves, and sealed drums. In correspondence dated June 19, 2019, the Respondent stated that the open 5-gallon containers of xylene, observed at Paint Booth # 4, were addressed and now a LPS degreaser is used to clean the valves. Additionally, three (3) more paint gun cleaning stations were purchased.

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 Hazardous Waste and Air Quality Regulations, including but not limited to LAC 33:III.2113.A.2.

II.

To perform, within sixty (60) days after receipt of this **COMPLIANCE ORDER**, complete and accurate hazardous waste determinations for all solid wastes generated, including wastes described in Findings of Fact paragraph II.A, in accordance with LAC 33:V.1103, and institute procedures to ensure that hazardous waste determinations are performed on all waste generated and documented in accordance with LAC 33:V.1103.B. The Respondent shall submit the results of these hazardous waste determinations to the Office of Environmental Compliance, Enforcement Division, within fifteen (15) days after their completion. The Respondent shall dispose of the waste based on the results of the hazardous waste determinations.

III.

To cease, immediately upon receipt of this **COMPLIANCE ORDER**, unauthorized treatment of hazardous waste.

IV.

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

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Amanda Marshall
Re: Enforcement Tracking No. MM-CN-19-00224
Agency Interest No. 5025

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

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

II.

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

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. MM-CN-19-00224
Agency Interest No. 5025

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 Amanda Marshall at (225) 219-3095 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.

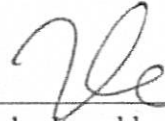
IV.

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 26th day of June, 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: Amanda Marshall



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.	MM-CN-19-00224	Contact Name	Amanda Marshall
Agency Interest (AI) No.	5025	Contact Phone No.	(225) 219-3095
Alternate ID No.	LAD980868509; 0920-00011		
Respondent:	Cameron International Corporation	Facility Name:	Cameron International Corporation
	c/o C T Corporation System	Physical Location:	257 Holloway Boulevard
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Ville Platte, LA, 70886
	Baton Rouge, LA, 70816	Parish:	Evangeline

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted to the Department within thirty (30) days of receipt of this COMPLIANCE ORDER in accordance with Paragraph III of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 75 days of receipt of the COMPLIANCE ORDER in accordance with Paragraphs II of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

<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 33:1.Subpart1.Chapter7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY MM-CN-19-0C224, 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 NOTICE OF POTENTIAL PENALTY MM-CN-19-0C224, 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)= \$ _____ • <i>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.</i>
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY MM-CN-19-00224 and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT		
<p><i>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.</i></p>		
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:		
<p>Louisiana Department of Environmental Quality Office of Environmental Compliance Enforcement Division P.O. Box 4312 Baton Rouge, LA 70821 Attn: Amanda Marshall</p>		