STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:	*	**Settlement Tracking No.**
	*	**SA-AE-22-0042**
CORNERSTONE CHEMICAL COMPANY	*	
	*	**Enforcement Tracking Nos.**
AI # 1357	*	**AE-CN-19-00038**
	*	**AE-CN-20-00432**
	*	**AE-CN-19-00038A**
	*	
PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT LA. R.S. 30:2001, ET SEQ.	*	

SETTLEMENT

The following Settlement is hereby agreed to between Cornerstone Chemical Company ("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 Waggaman, Jefferson Parish, Louisiana ("the Facility").

II

On March 25, 2019, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-19-00038 (Exhibit 1).

On July 29, 2020, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-20-00432 (Exhibit 2).

On March 24, 2021, the Department issued to Respondent an Amended Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-19-00038A

(Exhibit 3).

The following violations, although not cited in the foregoing enforcement action(s), are included within the scope of this settlement:

1. In the 2020 1st Semiannual Monitoring Report dated September 28, 2020, the Respondent reported the failure to timely submit the Notification of Compliance Status Report in accordance with Subpart DDDDD for the Alternative Boiler (GRP 0032). Specifically, the Boiler MACT Notification of Compliance Status Report was required to be submitted to the Office of Environmental Compliance within fifteen (15) days of startup for the Alternative Boiler A. The report was due on June 20, 2020; the report was submitted on August 12, 2020. The failure to timely submit the report is a violation of Specific Requirement 99 of Title V Permit No. 2306-V5, LAC 33:III.501.C.4, 40 CFR 63.7545(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, and La. R.S. 30:2057(A)(2).

2. In the 2020 1st Semiannual Monitoring Report dated September 28, 2020, the Respondent reported the failure to use the oxygen operating envelope of 1.2%-4%, which was developed during continuous emissions monitoring tests to ensure compliance with NOx emission limits as noted in the table below.

DATE	DURATION
01/09/2020	6 hours
01/11/2020	5 hours
01/27/2020	7 hours
02/11/2020	1 hour
02/27/2020	1 hour
05/08/2020	2 hours
05/12/2020	5 hours
05/15/2020	2 hours

Each failure to comply with the oxygen operating parameter is a violation of Specific Requirement No. 10 of Title V Permit No. 594-V5, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

3. In unauthorized discharge notification reports dated September 10, 2021, and November 2, 2021, the Respondent reported the release of 244 pounds of ammonia on August 28, 2021. According to the reports, the Dyno Nobel Louisiana Ammonia, LLC facility was shutting down the entire site in preparation for Hurricane Ida. The Dyno Nobel Louisiana Ammonia, LLC facility routed ammonia to the Respondent's ammonia header resulting in a higher ammonia pressure which relieved through a pressure safety valve (PSV) due to thermal expansion which required operator intervention to prevent a release. The Respondent

ultimately determined the release was preventable and as a result modified shutdown procedures for these scenarios to prevent recurrence. The failure to properly operate and maintain control equipment, including any device, operating scenario, or abatement scheme used to reduce emissions, is a violation of LAC 33:III.905 and La. R.S. 30:2057(A)(1) and 2057(A)(2).

4. In unauthorized discharge notification reports dated September 28, 2021, and November 2, 2021, the Respondent reported the release of 39,000 pounds of carbon dioxide. According to the reports, the Respondent receives bulk truck tanker shipments of refrigerated liquid carbon dioxide. On September 21, 2021, a tanker trailer began leaking from a pressure safety valve (PSV) during transport between the in-plant scale and the off-loading area. The PSV malfunctioned and did not properly reseat. The trailer was parked within the plant while venting continued. The Respondent and trailer owner planned to replace the PSV and off-load remaining product, but while waiting on the replacement PSV, the full 39,000 pounds of carbon dioxide in the tanker trailer vented to the atmosphere. The release began on September 21, 2021, and ended sometime after September 27, 2021. The Respondent leases the tanker trailer from the owner. The unauthorized discharge is a violation of LAC 33:III.905 and La. R.S. 30:2057(A)(1) and 2057(A)(2).

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 SEVENTY-FIVE THOUSAND AND NO/100 DOLLARS ($75,000.00), of which Three Thousand Seventeen and 13/100 Dollars ($3,017.13) 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 Orders & Notices of Potential Penalty, Amended Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

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

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.

CORNERSTONE CHEMICAL COMPANY

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
Chuck Carr Brown, Ph.D., Secretary

BY: _____
Celena J. Cage, 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: _____
Celena J. Cage, Assistant Secretary

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE
ENFORCEMENT DIVISION
POST OFFICE BOX 4312
BATON ROUGE, LOUISIANA 70821-4312

CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

Enforcement Tracking No.	AE-CN-19-00038	**Certified Mail No.**	7018 1130 0001 5655 1796
Agency Interest (AI) No.	1357	**Contact Name**	Alicia B. Ryan
Alternate ID No.	1340-00001	**Contact Phone No.**	225-219-3374
Respondent:	CORNERSTONE CHEMICAL COMPANY	**Facility Name:**	Fortier Manufacturing Complex
	c/o C T Corporation System	**Physical Location:**	10800 River Road
	Agent for Service of Process		
	3867 Plaza Tower Drive	**City, State, Zip:**	Waggaman, LA, 70094
	Baton Rouge, LA 70816	**Parish:**	Jefferson

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

FINDINGS OF FACT

An authorized representative of the Department inspected the abovementioned facility or conducted a file review of the facility to determine the degree of compliance with regulations promulgated in the Louisiana Administrative Code, Title 33. The State regulatory citations for the violation(s) identified during the inspection and/or file review are indicated below.

I.	The Respondent owns and/or operates Fortier Manufacturing Complex (the Facility), located at 10800 River Road in Waggaman, Jefferson Parish, Louisiana. The Facility operates under the authority of Title V Air Permits Nos. 594-V5 issued on December 28, 2017, 1981-V6 issued on June 11, 2018, 2195-V8 issued on September 5, 2018, and 2306-V4 issued on November 3, 2015.	
	Date of Violation	**Description of Violation**
II.	**Inspection(s) Chemical Accident Prevention Program (CAPP) August 6, 2018-August 8, 2018**	The Respondent incorrectly calculated the maximum intended inventory (MII). At the time of the inspection, the Respondent's representatives could not explain how the MII was calculated, and they did not think piping was included in the calculation. According to the Respondent's email dated September 20, 2018, the Facility was in the process of re-evaluating all piping, process vessels, and storage tanks to update the MII, which should be complete by the end of the first quarter 2019. Additionally, the Respondent reported that it completed an evaluation of the Sulfuric Acid Plant's oleum MII and provided this information in its September 20, 2018 email to the Department. The Respondent did not complete the MII for the remaining covered chemicals. The failure to correctly calculate the MII is a violation of 40 CFR 68.65(c)(1)(iii), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2).
III.	**Inspection(s) Chemical Accident Prevention Program (CAPP) August 6, 2018-August 8, 2018**	The Respondent failed to updated and revalidate a Process Hazard Analysis (PHA) every five (5) years. The revalidation of the PHA on node 17-0-16 was conducted in June 2008 and in November 2013. The revalidation in 2013 was five (5) months late. Additionally, the Respondent's PHA standard states in subsection 16.3.2.1 that "the time between the most recent revalidation and the next scheduled revalidation date must be five (5) years or less". The failure to update and revalidate PHA every five (5) years is a violation of 40 CFR 68.67(f), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2).
IV.	**Inspection(s) Chemical Accident Prevention Program (CAPP) August 6, 2018-August 8, 2018**	The Respondent failed to ensure operating procedures address properties of, and hazards presented by, the chemicals used in the process as described in 40 CFR 68.69(a)(3)(i) and did not include control measures to be taken if physical contact or airborne exposure occurs as described in 40 CFR 68.69(a)(3)(iii). Specifically, operating procedures 9-4 Cornerstone Chemical Company Waste Heat Boiler System and Tank Car Loading and Unloading did not contain the properties of, and hazards presented by, the chemicals used in the process, and measures to be taken if exposure occurs. Additionally, Operating procedures 9-3 Cornerstone Chemical Company Combustion Chamber System did not contain measures to be taken if exposures occur. The failure to include safety and health considerations is a violation of 40 CFR 68.69(a)(3)(i) and 40 CFR 68.69(a)(3)(iii), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2). According to the Respondent's email dated September 20, 2018, a site-wide review of the operating procedures has been conducted to ensure that the required properties of and hazards presented by chemicals in the process and measures to be taken if exposure occurs have been included in operating procedures.
V.	**Inspection(s) Chemical Accident Prevention Program (CAPP) August 6, 2018-August 8, 2018**	The Respondent failed to meet the appropriate frequency for testing of vessel X-16 and for preventive maintenance activities for acid plant equipment. The Respondent has established a two (2) year frequency for eddy current testing of heat exchangers. Eddy current testing of the Acid Cooler, X-16, occurred on March 9, 2013, May 9, 2015, and May 29, 2018. The period between the 2015 and 2018 tests was three (3) years versus the two (2) years frequency determined by the Facility. Preventive maintenance was overdue on thirteen (13) pieces of equipment. The Respondent failed to meet the appropriate frequency for preventive maintenance activities for acid plant equipment per the American Petroleum Institute (API) RP 581 for Risk Based Inspections. The failure to conduct testing at the determined frequency is a violation of 40 CFR 68.73(d)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2).
VI.	**Inspection(s) Chemical Accident Prevention Program (CAPP) August 6, 2018-August 8, 2018**	The Respondent failed to complete a Pre-Startup Safety Review (PSSR) and PHA recommendations prior to start-up of the process as described in 40 CFR 68.77(b)(1-4). The PSSR for MOC SF 17-35, titled Primary Acid to Acrylo, was completed on September 20, 2017, two (2) months after the change was already being utilized in the field on June 16, 2017. MOC SF 17-35 was classified as a class II process change authorization (PCA), requiring a PHA. A PHA was completed on July 26, 2017, with a recommendation to install and generate a Preventive Maintenance (PM) check valve and assigned a due date of February 28, 2018. This is a violation of 40 CFR 68.77(b)(1-4), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2). Based on follow-up information provided by the Respondent after the audit, the valve was not installed until March 16, 2018.

VII.	**Inspection(s) Chemical Accident Prevention Program (CAPP) August 6, 2018-August 8, 2018**	The Respondent developed but failed to implement procedures for the inspection of emergency response equipment including fire extinguisher hydrostatic testing and level A suit pressure testing. The Facility's annual fire extinguisher inspection conducted on April 1, 2017 indicated that 21 extinguishers were past due for hydrostatic testing; 19 extinguishers were overdue as of 2017, one (1) extinguisher was overdue as of 2016, and one (1) extinguisher was overdue as of 2015. The failure to implement inspection procedures for fire extinguishers is a violation of 40 CFR 68.95(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). According to the Respondent's warning letter response dated February 14, 2019, the Facility's policy is to pressure test level A suits annually, and that Level A suits are inspected annually as required; but there were no such pressure test inspection records prior to January 2017 because, at the time of the inspection the Facility did not retain records for five (5) years. The failure to maintain inspection records of the level A suits is a violation of 40 CFR 68.200, which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, and La. R.S. 30:2057(A)(2).
VIII.	**Inspection(s) January 18, 2018**	The Department received an unauthorized discharge notification report for incident ID: 182291 from the Respondent dated January 23, 2018, regarding a release that occurred on January 18, 2018. Specifically, the operator failed to re-open valve LPV-1001, resulting in the C-1 Stripper column filling up and going overhead into the Melamine Central Flare (VH-3), EQT 23, which caused the flare to be extinguished. The auto-ignition failed due to the liquid existing on the flare tip. The operators ignited the Melamine Central Flare with the backup Flame Front Generator. According to the Respondent's follow-up report dated March 23, 2018, this incident was preventable, approximately 149 pounds of ammonia were released from the Melamine Central Flare, and the event lasted 39 minutes. The Respondent failed to maintain and properly operate an installed control device to prevent the release. This is a violation of LAC 33:III.905.A, La. R.S. 30:2057(A)(1) and 30:2057(A)(2). According to Title V Air Permit No. 1981-V5, issued on February 17, 2017, the maximum pounds per hour permit limit for ammonia is 28.8 for Melamine Central Flare. The exceedance of the permit limit for ammonia is a violation of LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2). According to Specific Requirement No. 14 of Title V Permit No. 1981-V5, the Melamine Central Flare is required to operate with a flame present at all times. The failure to operate the Melamine Central Flare with a flame present at all the time is a violation of Specific Requirement No. 14 of Title V Permit No. 1981-V5, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
IX.	**Inspection(s) November 13, 2018**	The Department received an unauthorized discharge notification report for incident ID: 188109 from the Respondent dated November 15, 2018, regarding a release that occurred on November 13, 2018. An operator failed to close the isolation valve between the Reactor and the Catalyst Dosing Vessel before opening the vent valve to relieve compressed nitrogen that had been used to transfer the Melamine catalyst, which caused the ammonia and catalyst to leak from the vent valve. The operator identified that the isolation valve had not been closed, and closed the isolation valve, isolating the leak. According to the Respondent's follow-up report dated January 9, 2019, this incident was preventable, approximately 360 pounds of ammonia and 250 pounds of Melamine catalyst were released, and the event lasted 17 hours. The Respondent failed to maintain and properly operate an installed control device to prevent the release. This is a violation of LAC 33:III.905.A, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

ORDER

Based on the foregoing, the Respondent is **hereby ordered to comply with the requirements that are indicated below:**

I.	To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Air Quality Regulations. This shall include, **but not be limited to**, correcting all of the violations described in the "Findings of Fact" portion.
II.	To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violation(s) and actions taken or to be taken to achieve compliance with the "Order" portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to the Department at the address specified in this document.
III.	To submit to the Emergency and Radiological Services Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, updated calculation of the MII for the remaining covered chemicals per Paragraph II of the Findings of Fact. The Respondent shall submit either a copy of the cover letter or notify the Enforcement Division when the Respondent sent the updated calculation of the MII to Emergency and Radiological Services Division.

RIGHT TO APPEAL

I.	The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.
II.	The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the address specified in this document.
III.	Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Division of Administrative Law (DAL) Procedural Rules. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.
IV.	This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.
V.	The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.
VI.	Civil penalties of not more than thirty-two thousand five hundred dollars ($32,500) may be assessed for each day of violation. The

	Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars ($50,000) for each day of continued violation or noncompliance.
VII.	For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.	Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.
II.	Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Alicia B. Ryan at 225-219-3374 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 in order 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 violations 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 this 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.

CONTACTS AND SUBMITTAL OF INFORMATION

Enforcement Division:	***Hearing Requests:***
Louisiana Department of Environmental Quality Office of Environmental Compliance Air Enforcement Division Post Office Box 4312 Baton Rouge, LA 70821 **Attn: Alicia B. Ryan**	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-19-00038** **Agency Interest No1357**
Permit Division (if necessary):	***Physical Address (if hand delivered):***
Department of Environmental Quality Office of Environmental Services Post Office Box 4313 Baton Rouge, LA 70821-4313 **Attn: Air Permits Division**	Department of Environmental Quality 602 N Fifth Street Baton Rouge, LA 70802

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

- To appeal the **COMPLIANCE ORDER** portion, the Respondent must follow the guidelines set forth in the "Right to Appeal" portion of this **COMPLIANCE ORDER**.
- To request closure of this **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**, the Respondent must demonstrate compliance with the "Order" portion of this **COMPLIANCE ORDER** by completing the attached **"CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL REQUEST TO CLOSE"** form and returning it to the address specified.
- To expedite closure of the **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein.
- The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7.
- The Respondent may offer a settlement amount but the Department is under no obligation to enter into settlement negotiations. It is decided upon on a discretionary basis.
- The settlement offer amount may be entered on the attached **"NOTICE OF POTENTIAL PENALTY REQUEST TO SETTLE"** 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.

If you have questions or need more information, you may contact Dr. Alicia B. Ryan at (225) 219-3374 or alicia.ryan@la.gov.

Date: 3-25-19

Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

cc: Cornerstone Chemical Company
10800 River Road
Waggaman, LA 70094

Attachment(s)
- Request to Close

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE
ENFORCEMENT DIVISION
POST OFFICE BOX 4312
BATON ROUGE, LOUISIANA 70821-4312

CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE

Enforcement Tracking No.	AE-CN-19-00038	Contact Name	Alicia B. Ryan
Agency Interest (AI) No.	1357	Contact Phone No.	225-219-3374
Alternate ID No.	1340-00001		
Respondent:	CORNERSTONE CHEMICAL COMPANY	Facility Name:	Fortier Manufacturing Complex
	c/o C T Corporation System	Physical Location:	10800 River Road
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	
	Baton Rouge, LA 70816	Parish:	Waggaman, LA, 70094

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 III 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)

____ 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.

____ In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-19-00038), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.

____ In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-19-00038), 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.

- Monetary component = $_____
- Beneficial Environmental Project (BEP)component (optional)= $_____
- *DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.*

The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-19-00038) 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: Alicia B. Ryan

JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

July 29, 2020

CERTIFIED MAIL (7018 3090 0002 0488 4767)
RETURN RECEIPT REQUESTED

CORNERSTONE CHEMICAL COMPANY
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-20-00432
AGENCY INTEREST NO. 1357

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 **CORNERSTONE CHEMICAL COMPANY (RESPONDENT)** for the violation(s) described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violation(s) 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 Madison Kirkland at (225) 219-3165 or via email at madison.kirkland@la.gov.

Sincerely,

Celena J. Cage
Administrator
Enforcement Division

CJC/ MLK/AFC
Alt ID No. 1340-00001
Attachment

EXHIBIT
2

c: Cornerstone Chemical Company
c/o Mr. Shawn Ward, Director-HSSE
10800 River Road
Waggaman, LA 70094

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF	*	
	*	
CORNERSTONE CHEMICAL COMPANY	*	**ENFORCEMENT TRACKING NO.**
JEFFERSON PARISH	*	
ALT ID NO. 1340-00001	*	**AE-CN-20-00432**
	*	
	*	**AGENCY INTEREST NO.**
PROCEEDINGS UNDER THE LOUISIANA	*	
ENVIRONMENTAL QUALITY ACT,	*	**1357**
La. R.S. 30:2001, ET SEQ.	*	

CONSOLIDATED

COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

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

FINDINGS OF FACT

I.

The Respondent owns and/or operates the Fortier Manufacturing Complex (facility), a chemical manufacturing facility located at 10800 River Road in Westwego, Jefferson Parish, Louisiana. The Facility operates or has operated under the authority of the following Title V Air Permits:

UNIT	PERMIT	ISSUE DATE	PERMIT EXPIRATION DATE
Sulfuric Acid Regeneration Plant	594-V5	12/28/2017	12/28/2022
	594-V4	03/20/2014	08/08/2019
Urea/Melamine Plant	1981-V6	06/11/2018	04/11/2021
	1981-V5	02/17/2017	04/11/2021
	1981-V4	04/11/2016	04/11/2021
	1981-V3	09/27/2011	06/10/2015
Acrylonitrile Plant	2195-V8	09/05/2018	09/05/2023
	2195-V7	05/18/2017	06/27/2018
	2195-V6	12/18/2015	06/27/2018
	2195-V5	06/27/2013	06/27/2018

UNIT	PERMIT	ISSUE DATE	PERMIT EXPIRATION DATE
Utilities Plant/Site Services	2306-V5AA	01/06/2020	11/03/2020
	2306-V5	04/02/2019	11/03/2020
	2306-V4	11/03/2015	11/03/2020
	2306-V3	10/13/2011	06/18/2015
Hydrogen Cyanide Plant	3171-V0	03/09/2020	03/09/2025
Prevention of Significant Deterioration (PSD)	PSD-LA-575(M-2)	05/03/2012	05/03/2022

II.

On or about June 5-10, 2020, 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. While the review is not complete, the Department noted the violations found in paragraphs III-IX of the Findings of Fact portion of this enforcement action.

III.

In the Title V Air Permit Renewal Application dated December 20, 2017, the Respondent proposed the inclusion of formaldehyde and n-hexane as permitted pollutants from the combustion of natural gas. In Title V Permit No. 2195-V8 issued on September 5, 2018, the following pollutants were added to the permit:

POLLUTANT	EMISSION LIMIT (in tpy)
Barium and compounds	0.01
Benzene	0.02
Formaldehyde	0.14
Methanol	0.04
n-Hexane	2.87
Zinc (and compounds)	0.04

Emitting unpermitted pollutants is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

IV.

The Respondent reported the following unauthorized releases:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (duration)	POLLUTANTS RELEASED (RQ)	QUANTITY REPORTED (unit)	REPORTED CAUSE
A.	Unauthorized Discharge Notification Report T-176713 (3/28/2017)	2195-V7	Hole in a weld in a line in a process area; chemical mist into the atmosphere	03/28/2017	Acetonitrile (5000 lbs)	<0.62 lbs	On March 28, 2017, the Respondent experienced a release of an acetonitrile solution. Specifically, the Respondent's operator was working in a location, downwind of a pinhole leak that had later been identified as a line containing an Acetonitrile Solution. The Respondent stated that other employees noted the operator as disoriented and exhibited sign of exposure. The operator reported to the onsite medical department at approximately 16:00 hours, where he showered and was evaluated by medical staff. The incident resulted in a release that was below the reportable quantities of the referenced pollutants. In correspondence dated July 29, 2020, the Respondent stated that the cause for the pinhole leak was an improper weld, which allowed the internal corrosion to occur at the weld. In correspondence dated July 15, 2020, the Respondent reported the line is a stainless steel, uninsulated line and according the facility's RMP program should be inspected every ten (10) years. The last inspection prior to the incident was in 2015 and included ultrasonic testing. The line was up-to-date on its preventative maintenance schedule prior to the incident.
					Hydrogen Cyanide (10 lbs)	<0.10 lbs	
					Propionitrile (10 lbs)	<0.10 lbs	
					Acrylonitrile (100 lbs)	<0.10 lbs	
					Methanol (5000 lbs)	<0.10 lbs	
					Acetone (5000 lbs)	<0.10 lbs	
B.	Unauthorized Discharge Notification Report T-179498 (8/21/2017)	2195-V7	Drain valve left open when decontaminating the Acetonitrile column	08/14/2017 (9 min.)	Hydrocyanic acid (HCN) (10 lbs)	1 lb	On or about August 14, 2017, the Respondent experienced a release of HCN. Specifically, the Respondent's operator inadvertently left the drain valve open on the discharge side of a pump, which allowed 1 pound of HCN to be released. The facility alarms alerted the control room that HCN levels within the recovery column area were in excess of 10 parts per million (ppm). During the release, the operator collapsed and became unconscious. The operator was transported to the nearest hospital. Additionally, a second operator was treated in the onsite medical department. The Respondent reviewed the shut down and decontamination procedures to revise the sequence of steps to be taken to prevent reoccurrences. The Respondent determined the release was preventable.

Each unauthorized release of emissions is a violation of LAC 33:III.905, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

V.

The Respondent reported the following violations of permitted operating parameters:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	Title V 2015 2nd Semiannual Monitoring and Deviations Report (03/22/2016)	594-V4	UNF0004 Sulfuric Acid Plant	10/01/2015 – 10/06/2015 (128 hours)	All affected facilities shall comply with all provisions set forth in 40 CFR 60 Subpart A	The Respondent failed to perform quarterly cylinder gas audit for the oxygen CEMS instrument, AI-1060A, on the combustion chamber before the end of the 3rd quarter.	Specific Requirement No. 20

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
B.	Title V 2016 1st Semiannual Monitoring and Deviations Report (09/19/2016)	1981-V3	EQT0022 Melamine Flare	01/19/2016 (4 hours) 01/19/2016 (1 hour) 01/19/2016 (2 hours)	Heat Content >= 200 BTU/scf. Determine the net heating value of the gas being combusted by the methods specified in 40 CFR 60.18(f)(3). Subpart A.	On January 19, 2016, the T-9 – Slop Tank (EQT0100) was taken out of service to repair a leak on its inlet nozzle. In order to make the repair, the stream from the Melamine Plant had to be routed to T-104 – Wash Column Drain Tank (EQT0093), which vents to FS-1 Melamine Flare (EQT0022). The natural gas regulator was adjusted to increase the maximum flow to FS-1 from 600 scfm to 725 scfm to prevent future occurrences. The Respondent had an average BTU/scf of 193 during this incident.	40 CFR 60.18(c)(3)(ii), Specific Requirement No. 28
C.	Title V 2016 2nd Semiannual Monitoring and Deviations Report (03/15/2017)	594-V4	EQT0051 Sulfuric Acid Plant Stack	09/19/2016 (3 hours)	Permittee shall use the oxygen operating envelope of 1.2% – 4.0%, to ensure compliance with NOx emissions limits	The Respondent experienced an unexpected malfunction during normal operation when an expansion joint failed. Specifically, while repairing the expansion joint, the Respondent's operator did not cut back on the C-01 blower air flow, which caused the plant to operate outside of the permitted oxygen operating envelope. The Respondent stated in correspondence dated March 15, 2017, that the rates were reduced and there was no indication that permitted NOx emission limits were exceeded during the repair.	Specific Requirement No. 11
D.	Title V 2017 1st Semiannual Monitoring and Deviations Report (09/20/2017)	594-V4	EQT0051 Sulfuric Acid Plant Stack	4/25/2017 (2.1 hours)	Permittee shall use the oxygen operating envelope of 1.2% – 4.0%, to ensure compliance with NOx emissions limits	The Respondent operated above the 4% upper limit of the permitted oxygen operating envelope due to the loss of natural gas flow to the combustion chamber, which resulted from a partially plugged fuel line. Specifically, the Respondent experienced a process upset when the combustion chamber burners were extinguished and unable to be re-lit. While trying to re-light the burners, the Respondent's operator failed to respond to the oxygen operating envelope exceedance alarm. While troubleshooting, it was discovered that the piping to the burners was partially plugged. The Respondent cleared the fuel-light and re-lit the burners within approximately 2.1 hours. In correspondence dated September 28, 2017, the Respondent stated that the permitted max lb/hr NOx limit was not exceeded as a result of the incident.	Specific Requirement No. 11
E.	Title V 2017 1st Semiannual Monitoring and Deviations Report (09/20/2017)	1981-V5	EQT0023 Melamine Central Flare	05/13/2017 (1 hour)	< 60 ft/sec	The Respondent vented emissions to the atmosphere while shutting down the melamine and urea plants. Specifically, the vents were venting too high which put higher than normal process gas flow to EQT0023. The average process gas flow value was 64.5 ft/sec, which exceeded the permitted limit of 60.0 ft/sec.	40 CFR 60.18(c)(4)(i), Specific Requirement No. 17

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
F.	Revised Title V 2016 2nd Semiannual Monitoring and Deviations Report and Revised Title V 2017 1st Semiannual Monitoring and Deviations Report (06/25/2020)	2306-V4	CRG0009 Fire Pump Engines EQT0212 Main Gate Generator	03/19/2016-08/10/2017 (~1.4 years)	Change oil and filter every 500 hours of operation or annually, whichever comes first	The Respondent failed to change the oil and oil filter annually or every 500 hours for 92-94 – Generator (EQT0212). In correspondence dated June 25, 2020, the Respondent stated that the generator did not exceed the 500 hour limit; however, the annual frequency was exceeded for performing maintenance.	40 CFR 63.6602, Specific Requirement No. 45
G.					Inspect all hoses and belts, and replace as necessary. Equipment/ operational data monitored by visual inspection/ determination annually or every 500 hours of operation, whichever comes first.	The Respondent failed to inspect and/or change all hoses and belts every 500 hours for 92-94 – Generator (EQT0212). In correspondence dated June 25, 2020, the Respondent stated that the generator did not exceed the 500 hour limit; however, the annual frequency was exceeded for performing maintenance.	40 CFR 63.6602, Specific Requirement No. 47
H.					Inspect air cleaner. Equipment/ operational data monitored by visual inspection/ determination annually or every 1,000 hours of operation, whichever comes first.	The Respondent failed to inspect and/or change the air cleaner annually or every 1,000 hours for 92-94 – Generator (EQT0212). In correspondence dated June 25, 2020, the Respondent stated that the generator did not exceed the 1,000 hour limit; however, the annual frequency was exceeded for performing maintenance.	40 CFR 63.6602, Specific Requirement No. 46
I.	Revised Title V 2016 2nd Semiannual Monitoring and Deviations Report and Revised Title V 2017 1st Semiannual Monitoring and Deviations Report (06/25/2020)	2306-V3 and 2306-V4	CRG0009 Fire Pump Engines EQT0213 94-94 Instrument Air Dryer Emergency Generator	03/19/2015 – 08/10/2017 (~2.4 years)	Change oil and filter every 500 hours of operation or annually, whichever comes first	The Respondent failed to change the oil and oil filter annually or every 500 hours for 94-94 – Instrument Air Dryer Emergency Generator (EQT0213). In correspondence dated June 25, 2020, the Respondent stated that the annual maintenance on the engines exceeded the annual frequency. The emergency engines did not operate in excess of any hourly operating intervals	40 CFR 63.6602, Specific Requirement No. 45
J.					Inspect all hoses and belts, and replace as necessary. Equipment/ operational data monitored by visual inspection/ determination annually or every 500 hours of operation, whichever comes first.	The Respondent failed to inspect and/or change all hoses and belts every 500 hours for 94-94 – Instrument Air Dryer Emergency Generator (EQT0213). In correspondence dated June 25, 2020, the Respondent stated that the annual maintenance on the engines exceeded the annual frequency. The emergency engines did not operate in excess of any hourly operating intervals	40 CFR 63.6602, Specific Requirement No. 47
K.					Inspect air cleaner. Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first.	The Respondent failed to inspect and/or change the air cleaner annually or every 1,000 hours for 94-94 – Instrument Air Dryer Emergency Generator (EQT0213). In correspondence dated June 25, 2020, the Respondent stated that the annual maintenance on the engines exceeded the annual frequency. The emergency engine did not operate in excess of any hourly operating intervals	40 CFR 63.6602, Specific Requirement No. 46

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
L.	Title V 2018 1st Semiannual Monitoring and Deviation Report (09/26/2018)	594-V5	EQT 0051 Sulfuric Acid Plant Stack	02/20/2018 (15.23 hours)	Permittee shall use the oxygen operating envelope developed during continuous emissions monitoring tests to ensure compliance with NOx emission limits. Oxygen operating envelope=1.2-4%	The exceedance occurred due to temperature swings caused by loss of spent acid and addition of water to combustion chamber. While attempting to control the temperature swings in the combustion chamber, the operator could not control the C-03 Blower air supply. The controller for the combustion air inlet guide veins PC-1017 for the C-03 Blower was being controlled in manual mode due to failure of the inlet guide vein actuator.	Specific Requirement No. 10
M.				03/09/2018 (1.4 hours)			
N.	Title V 2018 1st Semiannual Monitoring and Deviation Report (09/20/2018)	1981-V5	EQT 0023 Melamine Central Flare	01/29/2018 (6 minutes)	Design and operate for no visible emissions, as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total of five (5) minutes during any two consecutive hours	The Melamine Plant experienced a high level in C-103Y High Pressure Absorber which triggered an interlock to close the inlet and outlet flows on the C-1 Absorber Column. The gas flow exiting this column is directed to the Melamine Central Flare. The operator noticed the loss of flow to C-1 and reporting the inlet valve, but failed to open the outlet valve. C-1 subsequently overflowed to VH-3 Melamine Central Flare. The overflow from C-1 is directed to the top of the flare for process protection. Part of the overflow stream exited the flare tip with the process flow and extinguished the flame on the flare.	40 CFR 60.18(c)(1), Specific Requirement No. 13
O.	Title V 2018 1st Semiannual Monitoring and Deviation Report (09/20/2018)	1981-V5	EQT 0023 Melamine Central Flare	01/29/2018 (6 minutes)	Operate with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f)	The Melamine Plant experienced a high level in C-103Y High Pressure Absorber which triggered an interlock to close the inlet and outlet flows on the C-1 Absorber Column. The gas flow exiting this column is directed to the Melamine Central Flare. The operator noticed the loss of flow to C-1 and re-opened the inlet valve, but failed to open the outlet valve. C-1 subsequently overflowed to VH-3 Melamine Central Flare. The overflow from C-1 is directed to the top of the flare for process protection. Part of the overflow stream exited the flare tip with the process flow and extinguished the flame on the flare.	40 CFR 60.18(c)(2), Specific Requirement No. 14
P.	Title V 2018 1st Semiannual Monitoring and Deviation Report (09/18/2018)	2306-V4	CRG 0009 Fire Pump Engines EQT 0212 Generator (Main Gate)	02/26/2018	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.	The engine was run at idle for longer than 30 minutes during routine startup-engine checks. Total startup/idle time=35 minutes	40 CFR 63.6602, 40 CFR 63.6625(h), Specific Requirement Nos. 48 and 76
Q.				04/23/2018			
R.				05/14/2018		The engine was run at idle for longer than 30 minutes during routine startup-engine checks. Total startup/idle time=40 minutes	
S.				06/25/2018		The engine was run at idle for longer than 30 minutes during routine startup-engine checks. Total startup/idle time=45 minutes	

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
T.	Title V 2018 2nd Semiannual Monitoring and Deviation Report (03/28/2019)	594-V5	EQT 0051 Sulfuric Acid Plant Stack	09/05/2018 (0.88 hour)	Permittee shall use the oxygen operating envelope developed during continuous emissions monitoring tests to ensure compliance with NOx emission limits. Oxygen operating envelope=1.2-4%	The Sulfuric Acid Plant deviated from the oxygen operating envelope as a result of the Methyl Methacrylate Plant shutting down and interrupting spent acid feed to the Sulfuric Acid Plant. This required the Sulfuric Acid Plant to increase sulfur feed. The plant operated above the 4% upper limit of the oxygen operating envelope.	Specific Requirement No. 10
U.	Title V 2019 1st Semiannual Monitoring and Deviation Report (09/25/2019)			04/29/2019 (1.8 hours)		The Sulfuric Acid Plant deviated from the oxygen operating envelope due to loss of Spent Acid from the MMA Plant.	
V.		2195-V8	EQT 0135 AN Flare Stack	04/12/2019 (2 hours)	Monitor flares to assure that they are operated and maintained in conformance with their designs	The natural gas flow rate was not increased when steam was added to the flare because of a lack of communication and manual gas flow control.	40 CFR 63.11(b)(1), Specific Requirement No. 43
W.				05/18/2019 (10 hours)			
X.	Title V 2019 2nd Semiannual Monitoring and Deviation Report (03/30/2020)	594-V5	EQT 0051 Sulfuric Acid Plant Stack	11/22/2019-11/23/2019 (9 hours)	Sulfur Dioxide (SO_2) <= 4 lb/ton	Following extended outages in November and December caused by tube failures in the waste heat boiler, deviations occurred as a result of poor conversion of SO_2 to SO_3. The increase of SO_2 emissions was due to unknown catalyst issues and gas-to-gas heat exchanger leaks at the time.	40 CFR 60.80, 40 CFR 60.82(a), Specific Requirement Nos. 1 and 3
Y.				12/06/2019 (3 hours)			
Z.				12/12/2019 (10 hours)			
AA.				12/12/2019-12/13/2019 (7 hours)			
BB.				12/13/2019-12/14/2019 (11 hours)			
CC.				12/27/2019 (1 hour)			
DD.	Title V 2019 2nd Semiannual Monitoring and Deviation Report (03/30/2020)	594-V5	EQT 0051 Sulfuric Acid Plant Stack	11/25/2019-11/26/2019 (24 hours)	Permittee shall demonstrate compliance with the opacity and PM 10 emissions limit of the permit by visually inspecting the Sulfuric Acid Plant Stack for opacity on a daily basis when the facility is operating.	The Sulfuric Acid Plant was down for several hours on November 25 and operators failed to take opacity readings.	40 CFR 60.85(b)(4) Specific Requirement No. 8
EE.			EQT 0053 Start-Up Heater Stack	11/25/2019-11/26/2019 (24 hours)	Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.	The Sulfuric Acid Plant was down for several hours on November 25 and operators failed to take opacity readings.	Specific Requirement 11 LAC 33:III.1101.B 40 CFR 60.13(c) Specific Requirement No. 23
FF.			EQT 0051 Sulfuric Acid Plant Stack	10/03/2019 (1 hour)	Permittee shall use the oxygen operating envelope developed during continuous emissions monitoring tests to ensure compliance with NOx emission limits. Oxygen operating envelope=1.2-4%	The Sulfuric Acid Plant experienced an upset as a molten sulfur gun which feeds the combustion chamber became plugged. The Respondent reported NOx emission limits were not exceeded as a result.	Specific Requirement 10

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
GG.	Title V 2019 2nd Semiannual Monitoring and Deviation Report (03/30/2020)	2306-VS	CRG 0009 Fire Pump Engines EQT 0212 Generator (Main Gate)	04/08/2019 08/19/2019 08/26/2019 11/11/2019	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.	The operator failed to record a stop time for the engine. Unable to confirm that the engine did not sit idle for longer than 30 minutes.	40 CFR 63.6602, 40 CFR 63.6625(h) Specific Requirement 4

Each failure to operate according to permitted requirements 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).

VI.

The Respondent reported the following violations of monitoring requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	Title V 2017 2nd Semiannual Monitoring and Deviation Report (03/07/2018)	2195-V7	CRG0007 1-79 and 1-82 Incinerators	11/01/2017 – 11/30/2017 (98 hours)	Permittee shall demonstrate compliance with the NOx emission limits of this permit by installing, calibrating, maintaining, and operating a continuous monitoring system for measuring nitrogen oxides emissions.	The Respondent did not measure 98 hours of NOx emissions during November 2017. Specifically, the analyzer failed to calibrate properly because of intermittent low sample flow in the analyzer. Various attempts to correct the problem were temporarily successful; however, the corrective measures did not permanently fix the problem. The Respondent hired an analyzer expert to repair the instrument and upon making the repairs, it was discovered that a tubing leak existed and an inline flow restrictor was plugged.	Specific Requirement No. 41
B.	Title V 2019 1st Semiannual Monitoring and Deviation Report (09/25/2019)	594-VS	EQT 0051 Sulfuric Acid Plant Stack	03/31/2019 - 04/12/2019	A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained, and operated by the owner or operator.	Quarterly Gas Audit Calibration was not conducted during the 1st quarter of 2019.	40 CFR 60.84(a), Specific Requirement No. 6

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).

VII.

The Respondent reported the following emission exceedances:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED (unit)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	Title V 2017 2nd Semiannual Monitoring and Deviations Report (03/27/2018)	594-V4	EQT0051 Sulfuric Acid Plant Stack	09/07/2017 (0.33 hours)	SO_2 567 lb/hr during startup 434 max lb/hr during normal operation	Not reported	The Respondent operated above the permitted limit of 567 lb/hr during startup. Specifically, the sulfuric acid regeneration plant was shutdown as the result of a leak that developed in a heat exchanger, which caused a plant upset and shutdown. The repairs to the heat exchanger took longer than expected, which allowed the converter to cool down more than anticipated. Due to this, the Respondent decided to start up the plant without the need for operating the preheater, which relied on the residual heat and the converter's exothermic reaction to heat up the facility. This start-up caused poor conversion of SO_2 to SO_3, which allowed excess SO_2 to be emitted, exceeding the permit limit for startup through the plant stack. In correspondence dated March 27, 2018, the Respondent stated that the heat exchanger will be repaired during the next turnaround and operating procedures were modified to ensure the incident does not reoccur.	Specific Requirement No. 10
B.	Title V 2018 1st Semiannual Monitoring and Deviation Report (09/20/2018)	1981-V5	EQT 0023 Melamine Central Flare	01/29/2018 (6 minutes)	Ammonia (28.80 max lb/hr)	67 lbs	The Melamine Plant experienced a high level in C-103Y High Pressure Absorber which triggered an interlock to close the inlet and outlet flows on the C-1 Absorber Column. The gas flow exiting this column is directed to the Melamine Central Flare. The operator noticed the loss of flow to C-1 and reporting the inlet valve, but failed to open the outlet valve. C-1 subsequently overflowed to VH-3 Melamine Central Flare. The overflow from C-1 is directed to the top of the flare for process protection. Part of the overflow stream exited the flare tip with the process flow and extinguished the flame on the flare.	Specific Requirement No. 50

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

VIII.

The Respondent failed to meet the following reporting requirements:

REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
2018 Annual Hours of Operation Report- Alkylation Spent Acid Tank Cap	594-V5	Report the operating time for the preceding calendar year to the Office of Environmental Compliance.	03/31/2019	Not submitted	Specific Requirement No. 22

Each failure to meet reporting requirements 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).

IX.

The Respondent reported the following violations from the Chemical Accident Prevention Provisions:

	REPORT (date)	PERMIT NUMBER/UNIT	INCIDENT DATE (duration)	REQUIREMENT	REPORTED CAUSE	SPECIFIC REQUIREMENT or REGULATION
A.	Title V 2016 2nd Semiannual Monitoring and Deviations Report (03/21/2017)	2306-V4 Coagulation Water Treatment and River Dock	April 2013 – January 2017	At least every five (5) years after the completion of the initial process hazard analysis, the process hazard analysis shall be updated and revalidated by a team meeting the requirements in paragraph (d) of this section, to assure that the process hazard analysis is consistent with the current process.	The Respondent stated that the Group10 Coagulation Water Treatment and River Dock were incorrectly labeled in the files and an incorrect recertification date was entered into the electronic PHA tracking database, which caused the PHA to not be revalidated within the five (5) year required timeframe. The PHA was due in April 2013, and was completed in January 2017.	40 CFR 68.67(f) Specific Requirement No. 65
B.	Title V 2017 2nd Semiannual Monitoring and Deviation Report (03/21/2018)	2306-V4 MeOH Storage and Cooling Tower System	2014-2018	At least every five (5) years after the completion of the initial process hazard analysis, the process hazard analysis shall be updated and revalidated by a team meeting the requirements in paragraph (d) of this section, to assure that the process hazard analysis is consistent with the current process.	The Respondent stated that the Group 3 MeOH Storage and Group 4 Cooling Tower System PHA's were found to be incomplete. Specifically, the piping and instrumentation diagrams (P&IDs) were missing from the last PHA conducted in 2009 and action items were in the 2009 PHA that were not adequately assigned or completed. The PHA was due in 2014, and was completed in 2018.	40 CFR 68.67(f) Specific Requirement No. 65
C.				The owner or operator shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible.		40 CFR 68.67(e) Specific Requirement No. 65
D.	Title V 2017 2nd Semiannual Monitoring and Deviation Report (03/21/2018)	2306-V4 No. 1 NH_3 Refrigeration System and Group 9 Instrument Air System	2014-2018	At least every five (5) years after the completion of the initial process hazard analysis, the process hazard analysis shall be updated and revalidated by a team meeting the requirements in paragraph (d) of this section, to assure that the process hazard analysis is consistent with the current process.	The Respondent stated that the Group 6 No. 1 NH_3 Refrigeration System and Group 9 Instrument Air System PHA's were found to be incomplete. Specifically, a management review was never conducted from the last PHA conducted in 2009 and action items were in the PHA that were not adequately assigned or completed. The PHA was due in 2014, and was completed in 2018.	40 CFR 68.67(f) Specific Requirement No. 65
E.				The owner or operator shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible.		40 CFR 68.67(e) Specific Requirement No. 65
F.	Title V 2019 1st Semiannual Monitoring and Deviation Report (09/25/2019)	1981-V6 UNF 0003 Urea/Melamine Plant	01/01/2019-06/06/2019	Inspections and tests shall be performed on process equipment.	During a PSM Audit, it was discovered that five (5) pieces of equipment had missing inspections.	40 CFR 68.73(d)(1) Specific Requirement No. 42

Each failure to comply is a violation of applicable permit and associated requirement(s) listed above, LAC 33:III.5901.A, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(2).

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, the Air Quality Regulations, and all applicable permits.

II.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER,** the quantity of SO_2 emitted over the 567 lb/hr startup limit for the Sulfuric Acid Plant Stack (EQT0051) as referenced in Paragraph VII.A of the **FINDINGS OF FACT** Findings of Fact portion of this action.

III.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER,** the actual BTU and any instances of exceedances of permitted emission limits for the violations cited in Paragraph V.V-W of the **FINDINGS OF FACT** portion of this action.

IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the missing 2018 Annual Hours of Operation Report for the Alkylation Spent Acid Tank Cap cited in Paragraph VIII of the **FINDINGS OF FACT** portion of this action. If the report was submitted timely, please provide a copy of the report as well as proof of submission (e.g. certified mail number or shipping information).

V.

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: Madison Kirkland
Re: Enforcement Tracking No. AE-CN-20-00432
Agency Interest No. 1357

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-20-00432
Agency Interest No. 1357

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 Madison Kirkland at (225) 219-3165 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 29th day of July, 2020.

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: Madison Kirkland

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE
ENFORCEMENT DIVISION
POST OFFICE BOX 4312
BATON ROUGE, LOUISIANA 70821-4312

CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY
REQUEST TO CLOSE

Enforcement Tracking No.	AE-CN-20-00432	Contact Name	Madison Kirkland
Agency Interest (AI) No.	1357	Contact Phone No.	(225) 219-3165
Alternate ID No.	1340-00001		
Respondent:	Cornerstone Chemical Company	Facility Name:	Fortier Manufacturing Complex
	c/o C T Corporation System	Physical Location:	10800 River Road
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Waggaman, LA 70094
	Baton Rouge, LA 70816	Parish:	Jefferson

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph V 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) II-IV 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)

____	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.
____	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-20-00432), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
____	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-20-00432), 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. • Monetary component = $_____ • Beneficial Environmental Project (BEP)component (optional)= $_____ • *DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.*
	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-20-00432) 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: Madison Kirkland		

JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

March 24, 2021

CERTIFIED MAIL (7019 2970 0000 6032 9524)
RETURN RECEIPT REQUESTED

CORNERSTONE CHEMICAL COMPANY
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

RE: AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-19-00038A
AGENCY INTEREST NO. 1357

Dear Sir/Madam:

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

Any questions concerning this action should be directed to Madison Kirkland at (225) 219-3165 or Madison.Kirkland@la.gov.

Sincerely,

Celena J. Cage
Administrator
Enforcement Division

CJC/MLK/mlk
Alt ID No. 1340-00001
Attachment

c: Cornerstone Chemical Company
c/o Mr. Shawn Ward, Director-HSSE
10800 River Road
Waggaman, LA 70094

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF	*	
	*	
CORNERSTONE CHEMICAL COMPANY	*	**ENFORCEMENT TRACKING NO.**
JEFFERSON PARISH	*	
ALT ID NO. 1340-00001	*	**AE-CN-19-00038A**
	*	
	*	**AGENCY INTEREST NO.**
	*	
PROCEEDINGS UNDER THE LOUISIANA	*	**1357**
ENVIRONMENTAL QUALITY ACT,	*	
La. R.S. 30:2001, ET SEQ.	*	

AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The Louisiana Department of Environmental Quality (the Department) hereby amends the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-19-00038** issued to **CORNERSTONE CHEMICAL COMPANY (RESPONDENT)** on March 25, 2019 in the above-captioned matter as follows:

I.

The Department hereby removes Findings of Fact Paragraph III of the Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-19-00038.

II.

The Department incorporates all of the remainder of the original **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-19-00038** and **AGENCY INTEREST NO. 1357** as if reiterated herein.

III.

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

Baton Rouge, Louisiana, this 24th day of March, 2021.

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
Post Office Box 4312
Baton Rouge, LA 70821-4312
Attention: Madison Kirkland