

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

LOUISIANA DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

AI # 189216

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

* Settlement Tracking No.
* SA-HE-22-0014
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* Enforcement Tracking No.
* HE-CN-17-00260
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SETTLEMENT

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

I

Respondent is a governmental entity that owns and/or operates US 190 Mississippi River Bridge maintenance project located at the District 61 Maintenance Yard under the US 190 Mississippi River Bridge in East Baton Rouge Parish, Louisiana (“the Site”).

II

On May 30, 2017, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. HE-CN-17-00260 (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 THREE THOUSAND FIVE HUNDRED AND NO/100 DOLLARS (\$3,500.00), of which Seven Hundred Ninety-Two and 90/100 Dollars (\$792.90) 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 East Baton Rouge Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

X

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

XI

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

XII

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

LOUISIANA DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

BY: [Signature]
(Signature)

Joubert Harris
(Printed)

TITLE: Environmental Comp. Allow

THUS DONE AND SIGNED in duplicate original before me this 28th day of July, 20 22, at Baton Rouge, LA.

[Signature]
NOTARY PUBLIC (ID # 01246)

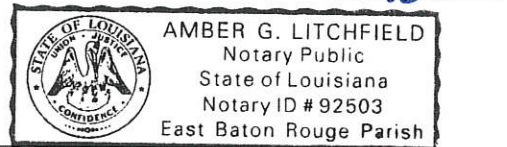
Kirk A. Bergeron
(stamped or printed)

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

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

THUS DONE AND SIGNED in duplicate original before me this 24th day of September, 20 22, at Baton Rouge, Louisiana.

[Signature]
NOTARY PUBLIC (ID # 92503)



(stamped or printed)

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

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE
May 30, 2017



CERTIFIED MAIL (7014 1200 0000 7864 1287)
RETURN RECEIPT REQUESTED

LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT
c/o Dr. Shawn Wilson, Secretary
P.O. Box 831
Baton Rouge, LA 70821

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. HE-CN-17-00260
AGENCY INTEREST NO. 189216**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT (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 Heather Brown at (225) 219-3792 or Heather.Brown@la.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Celena J. Cage".

Celena J. Cage
Administrator
Enforcement Division

CJC/HMB/hmb
Alt ID No. LAR000060640
Attachment

c: Louisiana Department of Transportation and Development
US 190 Mississippi River Bridge
P.O. Box 10481
Old Hammond Highway
Baton Rouge, LA 70816

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

IN THE MATTER OF

**LOUISIANA DEPARTMENT OF
TRANSPORTATION AND DEVELOPMENT
EAST BATON ROUGE PARISH
ALT ID NO. LAR000060640**

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

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ENFORCEMENT TRACKING NO.

HE-CN-17-00260

AGENCY INTEREST NO.

189216

**CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT (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 Louisiana Department of Transportation and Development – US 190 Mississippi River Bridge maintenance project located at the District 61 Maintenance Yard under the US 190 Mississippi River Bridge (the Site). The Respondent is performing maintenance on the bridge which includes blasting activities to remove paint from the bridge followed by application of a new coating of paint. The Respondent notified the Department as a large quantity generator (LQG) of hazardous waste and operates under the EPA facility identification number LAR000060640.

II.

On or about December 1, 2016, and December 2, 2016, inspections of the Site conducted by a representative of the Department revealed the following violations:

- A. The Respondent failed to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency, as specified in LAC 33:V.1511.F, in violation of LAC 33:V.1109.E.1.e. Specifically, the aisles in the less than 90-day container storage area were not sufficient for the movement of personnel and equipment. Some aisles were noted to have less than ten and a half (10.5) inches of aisle space.
- B. The Respondent failed to keep hazardous waste containers at or near any point of generation where wastes initially accumulate closed during storage, except when necessary to add or remove hazardous waste, as specified in LAC 33:V.2107.A, in violation of LAC 33:V.1109.E.4. Specifically, at the time of the inspection, the following containers, managed as satellite accumulation, were open:
 - a. Two (2) fifty-five (55) gallon drums of spent blasting waste (hazardous waste code D008) located in the West Reclaimer;
 - b. Multiple five (5) gallon and three (3) gallon containers of hazardous waste ground debris (hazardous waste code D008) located west side of the bridge; and,
 - c. Some of the five (5) gallon containers of hazardous waste spent solvent (hazardous waste codes F005, D001, and D028) near the paint reclamation unit in Area 1. However, these containers were closed by a facility representative at a later time during the inspection.
- C. The Respondent failed to clearly label or mark hazardous waste containers at or near any point of generation where wastes initially accumulate with the words "Hazardous Waste" or with other words that identify the contents of the containers, in violation of LAC 33:V.1109.E.4. Specifically, at the time of the inspection, the following containers managed as satellite accumulation were not labeled with the words "Hazardous Waste:"
 1. Two (2) drums of spent blasting waste (hazardous waste code D008) located in the West Reclaimer;

2. One (1) fifty-five (55) gallon drum of spent blasting waste (hazardous waste code D008) from a screen filter for the reclaimer located in the West Reclaimer;
 3. One (1) fifty-five (55) gallon drum of hazardous waste ground debris (hazardous waste code D008) located on the west side of the river under the bridge;
 4. Multiple five (5) gallon and three (3) gallon containers of hazardous waste ground debris (hazardous waste code D008) located on the west side of the river under the bridge; and,
 5. Several five (5) gallon containers of hazardous waste spent solvent (hazardous waste codes F005, D001, and D028) near the paint reclamation unit in Area 1.
- D. The Respondent failed to mark containers containing hazardous waste with an accumulation start date, in violation of LAC 33:V.1109.E.1.c. Specifically, three (3) fifty-five (55) gallon drums of hazardous waste (D008) in the less than 90-day container storage area were not marked with an accumulation start date at the time of the inspection. A facility representative marked the drums with an accumulation start date later during the inspection. This violation has been addressed.
- E. The Respondent failed to clearly mark and/or label containers used to store used oil with the words "Used Oil," in violation of LAC 33:V.4013.D.1. Specifically, one (1) drum of used oil filters and two (2) drip pans of used oil in Area 1 were not labeled. However, a facility representative labeled these containers with the words "Used Oil" later during the inspection. This violation has been addressed.
- F. The Respondent failed to keep a copy of each signed manifest for three (3) years or until a signed copy is received from the designated facility which received the waste in accordance with LAC 33:V.1107.D.1, in violation of LAC 33:V.1111.A.1. Specifically, at the time of the inspections, the Respondent did not have a signed copy from the designated treatment, storage, and disposal (TSD) facility for some of the manifests.
- G. The Respondent failed to create and implement a contingency plan for the facility as specified in LAC 33:V.1513.A.1, in violation of LAC 33:V.1109.E.1.e. Specifically, the facility has comprehensive plans which contain some of the contents required to

be in the contingency plan; however, the plans did not include all the necessary requirements for a contingency plan.

- H. The Respondent failed to develop and retain onsite a waste minimization plan certified by a Louisiana registered professional engineer, as specified in LAC 33:V.2245.J & K, in violation of LAC 33:V.1109.E.1.e. Specifically, the facility does not have a waste minimization plan. The facility has a similarly titled plan, but it only describes ways to minimize non-hazardous waste and recycling of that type of waste, not minimization in regard to hazardous waste.
- I. The Respondent failed to conduct and implement a training program to ensure personnel who handle hazardous waste do so in accordance with regulatory procedure as specified in LAC 33:V.1515, in violation of LAC 33:1109.E.1.e. Specifically, training records were provided for safety and other types of training, but no training was conducted regarding hazardous waste. Additionally, one of the training plans included information regarding the management of hazardous waste; however, there was no record this was provided to employees.
- J. The Respondent failed to submit a copy of the annual report to the Office of Environmental Services by March 1 of each year, in violation of LAC 33:V.1111.B.1. Specifically, the facility failed to submit an annual report for 2015.

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 Louisiana Hazardous Waste Regulations.

II.

To maintain, immediately upon receipt of this **COMPLIANCE ORDER**, aisle space of at least twenty-four (24) inches to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, as specified in LAC 33:V.1511.F.

III.

To close, immediately upon receipt of this **COMPLIANCE ORDER**, all containers of hazardous waste, as specified in LAC 33:V.2107.A.

IV.

To label, immediately upon receipt of this **COMPLIANCE ORDER**, all containers of hazardous waste, in accordance with LAC 33:V.1109.E.4.

V.

To institute procedures, immediately upon receipt of this **COMPLIANCE ORDER**, to ensure that signed manifests are maintained onsite for a period of at least three (3) years, in accordance with LAC 33:V.1109.D.1.

VI.

To develop and submit to the Office of Environmental Compliance, Enforcement Division, within thirty (30) days of receipt of this **COMPLIANCE ORDER**, a site contingency plan, as specified in LAC 33:V.1513. The site contingency plan shall meet the content requirements specified in LAC 33:V.1513.B.

VII.

To develop and submit to the Office of Environmental Compliance, Enforcement Division, within thirty (30) days of receipt of this **COMPLIANCE ORDER**, a waste minimization plan that meets the certification and content requirements specified in LAC 33:V.2245.J and K, respectively.

VIII.

To institute procedures, immediate upon receipt of this **COMPLIANCE ORDER**, to ensure that all employees responsible for managing hazardous waste have received or will receive initial and annual hazardous waste training meeting the requirements specified in LAC 33:V.1515.

IX.

To submit, within thirty (30) days of receipt of this **COMPLIANCE ORDER**, a 2015 Annual Hazardous Waste Report to the Office of Environmental Services, in accordance with LAC 33:V.1111.B.1.

X.

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: Heather Brown
Re: Enforcement Tracking No. HE-CN-17-00260
Agency Interest No. 189216

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. HE-CN-17-00260
Agency Interest No. 189216

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 Department's Rules of Procedure. 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 Heather Brown at (225) 219-3792 or Heather.Brown@la.gov 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 30th day of May, 2017.



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: Heather Brown

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.	HE-CN-17-00260	Contact Name	Heather Brown
Agency Interest (AI) No.	189216	Contact Phone No.	(225) 219-3792
Alternate ID No.	LAR000060640		
Respondent:	Louisiana Department of Transportation and Development	Facility Name:	DOT 190 Mississippi River Bridge
	c/o Dr. Shawn Wilson, Secretary Agent for Service of Process	Physical Location:	District 61 Maintenance Yard under US 190 Mississippi River Bridge
	P.O. Box 831	City, State, Zip:	Baton Rouge, LA 70802
	Baton Rouge, LA 70821	Parish:	East Baton Rouge

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph X 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) VI, VII, and IX 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 (HE-CN-17-00260), 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 (HE-CN-17-00260), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> • Monetary component = \$ _____ • Beneficial Environmental Project (BEP) component (optional)= \$ _____ • DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (HE-CN-17-00260) 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: Heather Brown		