

**STATE OF LOUISIANA**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**IN THE MATTER OF:**

**NATIONAL OILWELL VARCO, L.P.**

**AI # 17632**

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

\* **Settlement Tracking No.**

\* **SA-HE-23-0005**

\*

\* **Enforcement Tracking Nos.**

\* **HE-CN-15-01423**

\* **HE-PP-21-00105**

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**SETTLEMENT**

The following Settlement is hereby agreed to between National Oilwell Varco, L.P. (“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 partnership that owned and/or operated a facility located in Amelia, Assumption Parish, Louisiana (“the Facility”).

**II**

On February 15, 2016, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. HE-CN-15-01423 (Exhibit 1).

On July 2, 2021, the Department issued to Respondent a Notice of Potential Penalty, Enforcement Tracking No. HE-PP-21-00105 (Exhibit 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 FIFTEEN THOUSAND AND NO/100 DOLLARS (\$15,000.00), of which Two Thousand Eight Hundred Fifty-Nine and 51/100 Dollars (\$2,859.51) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

#### V

Respondent further agrees that the Department may consider the inspection report(s), permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty, 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 Assumption 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.

**NATIONAL OILWELL VARCO, L.P.**

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**  
Roger W. Gingles, 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



JOHN BEL EDWARDS  
GOVERNOR

CHUCK CARR BROWN, Ph.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE  
February 15, 2016

CERTIFIED MAIL (7006 0810 0003 0347 7334/9192)  
RETURN RECEIPT REQUESTED

NATIONAL OILWELL VARCO, L.P.  
c/o C T Corporation System  
Agent for Service of Process  
3867 Plaza Tower Dr.  
Baton Rouge, Louisiana 70816

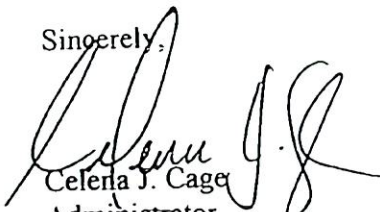
RE: CONSOLIDATED COMPLIANCE ORDER  
& NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. HE-CN-15-01423  
AGENCY INTEREST NO. 17632

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 **NATIONAL OILWELL VARCO, L.P. (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 Erin Dartz at (225) 219-3636.

Sincerely,  
  
Celeria J. Cage  
Administrator  
Enforcement Division

CJC/AED  
Alt ID No. LAD980748859  
Attachment



c: National Oilwell Varco, L.P.-Amelia South Coating Plant  
Post Office Box 1349  
Amelia, Louisiana 70340

STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF

NATIONAL OILWELL VARCO, L.P.  
ASSUMPTION PARISH  
ALT ID NO. LAD980748859

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

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\*  
\* ENFORCEMENT TRACKING NO.  
\*  
\* HE-CN-15-01423  
\*  
\* AGENCY INTEREST NO.  
\*  
\* 17632  
\*

CONSOLIDATED  
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **NATIONAL OILWELL VARCO, L.P. (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 a facility doing business as Tuboscope and known to the Department as the Amelia South Coating Plant. The facility conducts fabricating and finishing of metal structures and is located at 2112 Highway 662 in Amelia, Assumption Parish, Louisiana. The site includes a less than 90-day storage area and custom fabrication and paint shop. The site is registered as a Large Quantity Generator and mainly generates spent and unused paint waste. The facility was assigned EPA identification number LAD980748859.



II.

On or about June 16, 2015, an inspection was conducted by the Department that revealed the following violations:

- A. The Respondent failed to label or mark the containers storing hazardous waste with the words "Hazardous Waste," in violation LAC 33:V.1109.E.1.d. Specifically, one (1) 330-gallon tote of hazardous paint waste located in the less than 90-day storage area was not labeled with the words "Hazardous Waste".
- B. The Respondent failed to keep containers holding hazardous waste closed during storage except to add or remove waste, in violation of LAC 33:V.1109.E.1.a.i, as specified in LAC 33:V.2107.A. Specifically, two (2) 330-gallon totes containing waste (D001) located in the Custom Shop were not closed.
- C. The Respondent failed to properly label several 5-gallon containers with the words "hazardous waste" or other words that describe the contents of the container and failed to properly close the containers as specified in LAC 33:V.2107.A, in violation of LAC 33:V.1109.E.4. Specifically, paint buckets holding hazardous paint waste (D001) were not labeled and were left open.
- D. The Respondent failed to conduct the weekly inspections of the hazardous waste storage areas, in violation of LAC 33:V.1109.E.1.a.i, as specified in LAC 33:V.2109.A. Specifically, the Respondent identified two (2) satellite accumulation areas, one (1) at each end of the Custom Shop. Each area consisted of a 330-gallon tote storing hazardous waste (D001). Since the areas stored more than 55-gallons of hazardous waste, they are subject to the less than 90 day storage requirements of LAC 33:V.1109.E.1. During the inspection, Mr. Chad Anderson (Environmental Specialist) stated these areas were not included in the weekly container inspections.
- E. The Respondent failed to have an adequate Hazardous Waste Contingency Plan, in violation of LAC 33:V.1109.E.1.e as specified in LAC 33:1513.B. Specifically, the contingency plan did not include: agreements or arrangements by local emergency services, all the required information for the emergency coordinators, a list of all emergency equipment and respective locations, and an evacuation plan.
- F. The Respondent failed to provide hazardous waste training, as specified in LAC 33:V.1515, in violation of LAC 33:V.1109.E.1.e. Specifically, the Respondent

- provided RCRA training records for one (1) employee for 2013 and 2015, but could not provide any records for the employee for 2014.
- G. The Respondent failed to have the Waste Minimization Plan certified by a Louisiana registered Professional Engineer, in violation of LAC 33:V.1109.E.1.e, as specified in LAC 33:V.2245.J.
- H. The Respondent failed to list waste code D002 on the Annual Hazardous Waste Report, in violation of LAC 33:V.1111.B.1.e. Specifically, the Respondent provided Annual Hazardous Waste Reports for 2012, 2013, and 2014. According to hazardous waste manifest 009875350JJK dated November 29, 2012, the facility manifested D002 waste offsite, but did not include it in the annual report.
- I. The Respondent failed to notify the Office of Environmental Services within seven (7) days if any of the information submitted in the application for the EPA Identification Number changes, in violation of LAC 33:V.1105.B. Specifically, the HW-1 form was out of date. The site contact had retired and the Respondent did not update the form. The facility submitted an updated HW-1 form on June 30, 2015. This item is considered addressed.

### COMPLIANCE ORDER

Based on the foregoing, the Respondent is hereby ordered:

I.

To immediately begin, upon receipt of this COMPLIANCE ORDER, following the requirements of LAC 33:V.1109.E by properly closing, labelling, and dating containers storing hazardous waste and by storing waste in containers that are in good condition with no visible leaks or damage.

II.

To immediately begin, upon receipt of this COMPLIANCE ORDER, performing weekly inspections of containers kept in the Hazardous Waste less-than-ninety (90) day Container Storage Areas. This includes, but is not limited to, the areas referenced in Findings of Fact Paragraph II.D.

III.

To amend, within thirty (30) days of receipt of this COMPLIANCE ORDER, the Hazardous Waste Contingency Plan, to include all the requirements of LAC 33:V.1513.B. The Respondent shall

also submit a copy of the updated Contingency Plan to the Enforcement Division within ten (10) days of the completion of the required amendments to the Plan.

IV.

To immediately implement, upon receipt of this **COMPLIANCE ORDER**, procedures to ensure the hazardous waste training is provided to all applicable employees annually, as required by LAC 33:V.1515.

V.

To amend, within thirty (30) days of receipt of this **COMPLIANCE ORDER**, the Waste Minimization Plan to include certification by a Louisiana Registered Professional Engineer as required by LAC 33:V.2245.J, and to submit a copy of the amended Waste Minimization Plan to the Enforcement Division within ten (10) days of the completion of the required amendments to the Plan.

VI.

To include, upon receipt of this **COMPLIANCE ORDER**, all required information including waste codes on all Hazardous Waste Annual Reports, as required by LAC 33:V.1111.B.

VII.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Hazardous Waste Regulations.

VIII.

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: Erin Dartez  
Re: Enforcement Tracking No. HE-CN-15-01423  
Agency Interest No. 17632

**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-15-01423**  
**Agency Interest No. 17632**

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 Erin Dartez at (225) 219-3636 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.

IV.

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

Baton Rouge, Louisiana, this 15<sup>th</sup> day of Feb., 2016.



\_\_\_\_\_  
Chuck Carr Brown, Ph.D.  
Secretary  
Department of Environmental Quality

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: Erin Dartez



JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, PH.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

JUL 02 2021



CERTIFIED MAIL (7019 1640 0001 2617 1093)  
RETURN RECEIPT REQUESTED

**NATIONAL OILWELL VARCO, L.P.**  
c/o C T Corporation System  
Agent for Service of Process  
3867 Plaza Tower Drive  
Baton Rouge, LA 70816

**RE: NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. HE-PP-21-00105  
AGENCY INTEREST NO. 17632**

Dear Sir/Madam:

On or about September 24, 2020, an inspection, and a subsequent file review on or about June 16, 2021, of **TUBOSCOPE- AMELIA SOUTH COATING PLANT**, owned and/or operated by **NATIONAL OILWELL VARCO, L.P. (RESPONDENT)**, were performed to determine the degree of compliance with the Louisiana Environmental Quality Act (the Act) and the Hazardous Waste Regulations. The facility conducts fabricating and finishing of metal structures and is located at 2112 Highway 662 in Amelia, Assumption Parish, Louisiana. The facility was previously registered as a Large Quantity Generator (LQG) of hazardous waste and mainly generated spent and unused paint waste. On or about October 14, 2020, the Respondent submitted an updated Notification of Hazardous Waste Activity Form (HW-1), notifying the Louisiana Department of Environmental Quality (the Department) as being a generator of less than 100 kilograms of hazardous waste per month (now regulated as a Very Small Quantity Generator). The facility was assigned EPA identification number LAD980748859.

On or about February 15, 2016, the Department issued **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY HE-CN-15-01423** to the Respondent as a result of the inspection conducted at the facility on or about June 16, 2015. The Respondent received the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY HE-CN-15-01423** on or about February 18, 2016. A Failure to Respond Letter dated October 31, 2017 was delivered to the Respondent on or about November 8, 2017. Responses to **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY HE-CN-15-01423** were submitted to the Department by the Respondent via email on or about March 10, 2021 and March 12, 2021.



National Oilwell Varco, L.P.  
HE-PP-21-00105  
Page 2

While the investigation by the Department is not yet complete, the following violations were noted during the September 24, 2020 inspection and June 16, 2021 file review:

- A. The Respondent failed to notify the Office of Environmental Services within seven (7) days if any of the information submitted in the notification of hazardous waste activity changes, in violation of LAC 33:V.1017.A. Specifically, the facility's Notification of Hazardous Waste Activity Form (HW-1) was out of date. The facility contact had retired, and the facility was no longer a Large Quantity Generator since the Custom Fabrication and Paint Shop at the facility ceased operations in September 2015. The Respondent submitted an updated HW-1 Form on or about October 14, 2020.
- B. The Respondent failed to describe, in the facility's contingency plan, arrangements agreed upon by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, in violation of **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY HE-CN-15-01423** and LAC 33:V.1513.B.3. Specifically, the facility's current contingency plan does not include the above-referenced information.
- C. The Respondent failed to amend the contingency plan immediately after the emergency coordinator list changed, in violation of LAC 33:V.1513.D.5. Specifically, the Respondent failed to update the contingency plan to reflect the current emergency coordinator.

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.

Prior to the issuance of any additional appropriate enforcement action, 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 Dr. Jacqueline Prudente at (225) 219-3095 or [Jacqueline.prudente@la.gov](mailto:Jacqueline.prudente@la.gov) within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

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.



National Oilwell Varco, L.P.  
HE-PP-21-00105  
Page 3

For each violation described herein, the Department reserves the right to seek civil penalties and the right to seek compliance with its rules and regulations in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties and compliance.

The Department assesses civil penalties based on LAC 33:1.Subpart1.Chapter 7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY**, 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 "**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.

To reduce document handling, please refer to the Enforcement Tracking Number and Agency Interest Number on the front of this document on all correspondence in response to this action.

Sincerely,



Lourdes Iturralde  
Assistant Secretary  
Office of Environmental Compliance

LI/JAP/jap  
Alt ID No. LAD980748859

c: National Oilwell Varco, L.P.-Amelia South Coating Plant  
c/o Rick Jackson, VP for Operations  
P. O. Drawer 1349  
Amelia, Louisiana 70340

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



**NOTICE OF POTENTIAL PENALTY  
 REQUEST TO SETTLE (OPTIONAL)**

Enforcement Tracking No.	HE-PP-21-00105	Contact Name	Dr. Jacqueline Prudente
Agency Interest (AI) No.	17632	Contact Phone No.	(225) 219-3095
Alternate ID No.	LAD980748859		
Respondent:	National Oilwell Varco, L.P.	Facility Name:	Amelia South Coating Plant
	c/o C T Corporation System	Physical Location:	2122 Louisiana Highway 662
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Amelia, LA 70340
Baton Rouge, LA 70816	Parish:	Assumption	

**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 33:1.Subpart1.Chapter7.

In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (HE-PP-21-00105), 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 (HE-PP-21-00105), 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 (HE-PP-21-00105) 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: Dr. Jacqueline Prudente