

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

BRENNTAG SOUTHWEST, INC.

AI # 4339

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

* **Settlement Tracking No.**
* **SA-WE-24-0041**
*
* **Enforcement Tracking No.**
* **WE-CN-22-00530**
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SETTLEMENT AGREEMENT

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

I

Respondent is a corporation that owns and/or operates a chemical distribution and tank farm located in St. Gabriel, Iberville Parish, Louisiana (“the Facility”).

II

On June 1, 2023, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. WE-CN-22-00530 (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 NINETEEN THOUSAND EIGHT HUNDRED AND NO/100 DOLLARS (\$19,800.00), of which One Thousand Seven Hundred Twenty-Seven and 89/100 Dollars (\$1,727.89) represents the Department's enforcement costs, in settlement of the claims set forth in this Settlement 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 and this Settlement Agreement 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 Settlement 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 Settlement Agreement in any action by the Department to enforce this Settlement Agreement.

VII

This Settlement Agreement 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 Agreement, 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 Iberville Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this Settlement Agreement 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 Agreement 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 thirty (30) days from notice of the Secretary's signature. If payment is not received within that time, this Settlement Agreement is voidable at the option of the Department. The Respondent shall provide its tax identification number when submitting payment. 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 attached hereto.

XI

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

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.

BRENNTAG SOUTHWEST, INC.

BY: _____
(Signature)

(Printed)

TITLE: _____

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

NOTARY PUBLIC (ID # _____)

(stamped or printed)


LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Aurelia S. Giacometto, Secretary


BY: _____
Jerrie "Jerry" Lang, Assistant Secretary
Office of Environmental Compliance

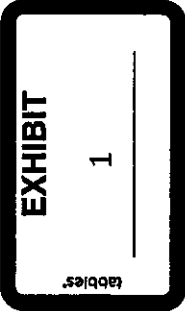
THUS DONE AND SIGNED in duplicate original before me this _____ day of _____, 20_____, at Baton Rouge, Louisiana.

NOTARY PUBLIC (ID # _____)

(stamped or printed)

Approved:  _____
Jerrie "Jerry" Lang, Assistant Secretary

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE ENFORCEMENT DIVISION		CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY	
POST OFFICE BOX 4312 BATON ROUGE, LOUISIANA 70821-4312			
Enforcement Tracking No.	WE-CN-22-00530	Certified Mail No.	7022 2410 0000 7120 0710
Agency Interest (AI) No.	4339	Contact Name	Olivia Wall
Alternate ID No.	LA0103462	Contact Phone No.	225-219-7084
Respondent:	Branntag Southwest Inc.	Facility Name:	Branntag Southwest Inc.
	c/o CT Corporation System	Physical Location:	7200 Hwy 74
	Agent for Service of Process	City, State, Zip:	St. Gabriel, LA 70776
	3867 Plaza Tower Dr. Baton Rouge, LA 70816	Parish:	Iberville
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).			
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 a chemical distribution and tank farm located at 7200 Hwy 74, St. Gabriel, Iberville Parish, Louisiana. The Respondent was issued Louisiana Pollutant Discharge Elimination System (LPDES) Permit LA0103462 on June 19, 2015, with an effective date of August 1, 2015 and expiration date of July 31, 2020. The Respondent submitted a renewal application on or about July 23, 2020 and LPDES Permit LA0103462 was administratively continued until it was reissued on December 21, 2021, with an effective date of February 1, 2022. LPDES Permit LA0103462 will expire on January 31, 2027. Under the terms and conditions of LPDES Permit LA0103462, the Respondent is permitted to discharge stormwater from the tank farm, loading/unloading, tote storage, and truck dock area, treated sanitary wastewater from office building, and treated sanitary wastewater from the driver's changing room into an unnamed ditch, thence into Bayou Braud, thence into Bayou Manchac, all waters of the state. Effective January 1, 2013, the Respondent was automatically covered under the Louisiana Sewage Sludge and Biosolids Use or Disposal General Permit LAJ660000.		
	Date of Violation	Description of Violation	
II.	Inspection(s) & File Review 2/24/22 & 5/15/23	The Respondent failed to comply with LPDES permit LA0103462. Specifically, a review of Discharge Monitoring Reports (DMRs) between January, 2018 and April, 2023, revealed that the Respondent reported exceedances of permit effluent limitations for TSS, CBOD, COD, Fecal Coliform, Ammonia Nitrogen, DO, and TOC (See Table 1). (LA0103462 (Prior to February 1, 2022, Effluent Limitations and Monitoring Requirements pages 2, 7 and 8 of 8 and Part III, Section A.2), La. R.S. 30:2076(A)(3), and LAC 33: IX.501.D)	
III.	File Review 5/15/23	The Respondent failed to comply with LPDES permit LA0103462. Specifically, the Respondent failed to report sample values for all parameters on the monthly Discharge Monitoring Reports (DMRs) for Outfalls 001 and 003 for the monitoring period of March 2020 and for pH, CBOD, and Fecal Coliform parameters for the quarterly DMRs for Outfalls 004 and 005 for the monitoring period of January to March 2020. (LA0103462 (Prior to February 1, 2022, Effluent Limitations and Monitoring Requirements pages 2, 7 and 8 of 8 and Part III, Sections A.2 and D.4), La. R.S. 30:2076(A)(3), and LAC 33: IX.2701.A)	
IV.	Inspection(s) & File Review 2/24/22 & 5/15/23	The Respondent failed to comply with LPDES permit LA0103462. Specifically, the Respondent failed to include a list of commodities handled and/or stored at the facility's chemical storage area and tank farm either in the comments or as an attachment with each set of DMRs submitted for the monthly and quarterly monitoring periods from July of 2018 through March of 2022 and from July to September of 2022. (LA0103462 (Prior to February 1, 2022, Part II, Section K and Part III, Section A.2; after February 1, 2022, Part II, Section K and Part III, Section A.2), and LAC 33: IX.2701.A)	
V.	File Review 5/15/23	The Respondent failed to sample the effluent from outfall 001 on a monthly basis as required by LPDES LA0103462. Specifically, the Respondent failed to sample for Outfall 001 for the monitoring period of April 2021. (LA0103462 (Effluent Limitations and Monitoring Requirements pages 2-5 of 7 and Part III, Section C.1), La. R.S. 30:2076(A)(3), and LAC 33: IX.501.A)	
VI.	Inspection(s) & File Review 2/24/22 & 5/15/23	The Respondent failed to comply with LPDES permit LA0103462. Specifically, the Respondent failed to conduct annual inspections and include annual inspection reports in the Stormwater Pollution Prevention Plan (SWPPP) as specified by the permit. (LA0103462 (Prior to February 1, 2022, Part II, Section P.4 and Part III, Section A.2; after February 1, 2022, Part II, Section P.4 and Part III, Section A.2), and LAC 33: IX.2701.A)	
VII.	File Review 5/15/23	The Respondent failed to notify the Department of facility changes. Specifically, the Respondent failed to notify the Department of the removal of the sewage treatment plant at Outfalls 004 and 005 and the connection of the outfalls to the municipal sewage system of the City of St. Gabriel. (LA0103462 (Part III, Section A.1 and Section D.1), La. R.S. 30:2076(A)(3), and LAC 33: IX.2701.L8)	
VIII.	File Review 5/15/23	The Respondent failed to comply with Louisiana's Sewage Sludge and Biosolids Use or Disposal General Permit LAJ660000. Specifically, the Respondent failed to submit the annual Sewage Sludge & Biosolids Use or Disposal Reporting Form for Sewage Sludge Pumped Out or Removed from a Sanitary Wastewater Treatment Works and Sold, Given Away, and/or Hauled Off-site for a Fee or Other Consideration (Form 7264) to the Department for the years 2018 through 2022. (LAJ660000 (Part II, Section C.3 and Part III, Section A.2), La. R.S. 30:2076 (A)(3), and LAC 33: IX.7313.A.2)	
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 Water 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 Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, properly completed DMRs for the monitoring periods of the last three (3) years mentioned in Paragraph III of the "Findings of Fact" portion of this Order. If you are submitting copies of DMRs, please be advised that each copy of the DMR shall be signed and certified. If no sampling or monitoring was conducted during a monitoring period, the Respondent should indicate this in the space provided for "Comment and Explanation of Any Violations."
IV.	To submit to the Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, a list of commodities as outlined in LAO103462 Part II, Section K for the monitoring periods of July 2018 through March 2022 and July to September 2022.
V.	To submit notification, via a letter for a permit modification to the Water Permits Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, addressing the outfalls that are no longer connected to the facility and therefore, need to be removed from the permit.
VI.	To submit to the Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, the annual Sewage Sludge & Biosolids Use or Disposal Reporting Forms (Form 7264) for the years 2018 through 2022 mentioned in Paragraph VIII of the "Findings of Fact" portion of this Order.
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 left-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's (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 Olivia Wall at 225-219-7084 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 33:1.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 may submit the settlement offer within one hundred and eighty (180) days of receipt of this **NOTICE OF POTENTIAL PENALTY** portion but no later than ninety (90) days of achieving compliance with the **COMPLIANCE ORDER** portion. 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.

Enforcement Division: Louisiana Department of Environmental Quality Office of Environmental Compliance Water Enforcement Division Post Office Box 4312 Baton Rouge, LA 70821 Attn: Olivia Wall	Hearing Requests: 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. WE-CN-22-00530 Agency Interest No. 4339
Water Permits Division (if necessary): Department of Environmental Quality Office of Environmental Services Post Office Box 4313 Baton Rouge, LA 70821-4313 Attn: Water Permits Division	Physical Address (if hand delivered): Department of Environmental Quality 602 N Fifth Street Baton Rouge, LA 70802

HOW TO REPLY TO THIS COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY

- To appeal the **CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY**, the Respondent must follow the guidelines set forth in the "Right to Appeal" portion of this **CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY**.
- To request closure of the **COMPLIANCE ORDER** portion, the Respondent must demonstrate compliance with the "Order" portion of this **COMPLIANCE ORDER** by completing the attached **"CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE"** form and returning it to the address specified.
 - Before requesting closure of the **COMPLIANCE ORDER** portion, please contact the Financial Services Division at 225-219-3865 or email them at _DEQ-WWWFinancialServices@la.gov to determine if you owe outstanding fees.
- 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 33:1.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 **"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.
 - Before requesting closure of the **NOTICE OF POTENTIAL PENALTY** portion, please contact the Financial Services Division at 225-219-3865 or email them at _DEQ-WWWFinancialServices@la.gov to determine if you owe outstanding fees.


If you have questions or need more information, you may contact Olivia Wall at 225-219-7084 or Olivia.Wall@la.gov.



 Odene J. Cage
 Assistant Secretary
 Office of Environmental Compliance

Date: 06/01/2023

- Attachment(s)**
- Request to Close
 - Table 1

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.	WE-CN-22-00530	Contact Name	Olivia Wall	
Agency Interest (AI) No.	4339	Contact Phone No.	225-219-7084	
Alternate ID No.	LA0103462			
Respondent:	Brenntag Southwest Inc.	Facility Name:	Brenntag Southwest Inc.	
	c/o GT Corporation System	Physical Location:	7200 Hwy 74	
	Agent for Service of Process	City, State, Zip:	St. Gabriel, LA 70776	
	3867 Plaza Tower Dr. Baton Rouge, LA 70816	Parish:	Iberville	
STATEMENT OF COMPLIANCE				
A written report was submitted in accordance with Paragraph II of the "Order" portion of the COMPLIANCE ORDER.			Date Completed	Copy Attached?
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) III, IV, V, and VI 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:				
INTERESTED 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 333 Subpart 1, Chapter 7.			
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (WE-CN-22-00530), 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 (WE-CN-22-00530), 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. The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (WE-CN-22-00530) 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 Post Office Box 4312 Baton Rouge, LA 70821 Attn: Olivia Wall				

If you have questions or need more information, you may contact Olivia Wall at 225-219-7084 or Olivia.Wall@la.gov.

TABLE 1

Monitoring Period End Date	Location	Parameter	Limit	MOA Value	Unit
07/31/2018	001-A	Oxygen demand, chem. [high level] [COD] -- DAILY MX	100	280	mg/L
08/31/2018	001-A	Oxygen demand, chem. [high level] [COD] -- DAILY MX	100	151	mg/L
09/30/2018	001-A	Oxygen demand, chem. [high level] [COD] -- DAILY MX	100	130	mg/L
09/30/2018	005-Q	Coliform, fecal general -- DAILY MX	200	>2000	CFU/100mL
10/31/2018	001-A	Oxygen demand, chem. [high level] [COD] -- DAILY MX	100	158	mg/L
12/31/2018	004-S	Nitrogen, ammonia total [as N] -- MO AVG	2	6.96	mg/L
12/31/2018	005-Q	Coliform, fecal general -- DAILY MX	200	480	CFU/100mL
12/31/2018	005-Q	BOD, carbonaceous [5 day, 20 C] -- MO AVG	10	50.8	mg/L
12/31/2018	005-S	Oxygen, dissolved [DO] -- MO AV MN	5	1.8	mg/L
12/31/2018	005-S	Nitrogen, ammonia total [as N] -- MO AVG	2	3.51	mg/L
01/31/2019	001-A	Oxygen demand, chem. [high level] [COD] -- DAILY MX	100	114	mg/L
03/31/2019	004-Q	BOD, carbonaceous [5 day, 20 C] -- MO AVG	10	<60	mg/L
03/31/2019	005-Q	BOD, carbonaceous [5 day, 20 C] -- MO AVG	10	<60	mg/L
06/30/2019	004-S	Nitrogen, ammonia total [as N] -- MO AVG	2	2.6	mg/L
06/30/2019	005-S	Oxygen, dissolved [DO] -- MO AV MN	5	3.53	mg/L
06/30/2019	005-S	Nitrogen, ammonia total [as N] -- MO AVG	2	15.7	mg/L
09/30/2019	005-Q	Coliform, fecal general -- DAILY MX	200	340	CFU/100mL
10/31/2019	001-A	Oxygen demand, chem. [high level] [COD] -- DAILY MX	100	269	mg/L
10/31/2019	001-A	Carbon, tot organic [TOC] -- DAILY MX	50	75.9	mg/L
12/31/2019	004-Q	Coliform, fecal general -- DAILY MX	200	1100	CFU/100mL
12/31/2019	004-S	Nitrogen, ammonia total [as N] -- MO AVG	2	3.9	mg/L
12/31/2019	005-S	Oxygen, dissolved [DO] -- MO AV MN	5	1.37	mg/L
12/31/2019	005-S	Nitrogen, ammonia total [as N] -- MO AVG	2	43.5	mg/L
06/30/2020	005-Q	Coliform, fecal general -- DAILY MX	200	>2000	CFU/100mL
06/30/2020	005-Q	BOD, carbonaceous [5 day, 20 C] -- MO AVG	10	16.3	mg/L
06/30/2020	005-S	Oxygen, dissolved [DO] -- MO AV MN	5	.06	mg/L
06/30/2020	005-S	Nitrogen, ammonia total [as N] -- MO AVG	2	27.9	mg/L
12/31/2020	004-Q	Coliform, fecal general -- DAILY MX	200	1000	#/100mL
01/31/2021	001-A	Oxygen demand, chem. [high level] [COD] -- DAILY MX	100	137	mg/L
06/30/2021	004-S	Nitrogen, ammonia total [as N] -- MO AVG	2	4.2	mg/L