

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

HONEYWELL INTERNATIONAL INC.

AI # 2082

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

* Settlement Tracking No.
* SA-AE-15-0048
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* Enforcement Tracking No.
* AE-CN-12-00757
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SETTLEMENT

The following Settlement is hereby agreed to between Honeywell International 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 manufacturing facility located in Ascension Parish, Louisiana (“the Facility”).

II

On March 8, 2013, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. **AE-CN-12-00757**, which was based upon the following findings of fact:

“The Respondent owns and/or operates the Geismar Plant (the Facility), a chemical manufacturing facility located at 5525 Louisiana Highway 3115 in Geismar, Ascension Parish, Louisiana. The Facility operates or has operated under the authority of the following Title V Air Permits:

| UNIT | PERMIT | ISSUE DATE | EXPIRATION DATE |
|-------------------------|---------------|------------------|------------------|
| Hydrofluoric Acid Plant | 2394-V0 | June 22, 2006 | June 22, 2011 |
| | 2394-V1 | March 25, 2010 | June 22, 2011 |
| | 2394-V2 | October 4, 2011 | October 4, 2016 |
| Fluorocarbon Plants | 0180-00003-V1 | January 17, 2007 | January 17, 2012 |
| | 0180-00003-V2 | January 28, 2011 | January 28, 2016 |
| | 0180-00003-V3 | April 18, 2011 | January 28, 2016 |
| | 0180-00003-V4 | March 1, 2012 | January 28, 2016 |

On or about March 13, 2008, and March 20, 2008, inspections of the Respondent's facility were performed to determine the degree of compliance with the Act and the Air Quality Regulations.

While the Department's investigation is not yet complete, the following violations were noted during the course of the inspections:

- A. For the 2007 monitoring period, the Respondent exceeded the 5,280,000 gallons per year (gpy) throughput permit limit for the 9-93 Thermal Oxidizer Acid Tank, Emission Point No. EQT069. Specifically, the throughput was 42,736,180 gallons during the 2007 calendar year. According to correspondence dated December 20, 2012, the Respondent reported the throughput for 2008, 2009, and 2010 calendar years to be 48,039,697 gallons, 51,192,401 gallons, 52,776,696 gallons, respectively. On or about March 4, 2008, a permit application was submitted to the Department requesting an increase of the throughput for EQT069. The Permit Modification dated January 28, 2011, increased the throughput for EQT069 to 43,000,000 gallons. Each exceedance of the permitted emission limit is a violation of Part 70 General Condition C of Title V Permit No. 0180-00003-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- B. For the 2007 monitoring period, the Respondent exceeded the 15,000,000 gpy throughput permit limit for the 10-02 Rainwater Collection Tank, Emission Point No. EQT083. Specifically, the throughput was 47,565,984 gallons during the 2007 calendar year. According to correspondence dated December 20, 2012, the Respondent reported the throughput for 2008, 2009, and 2010 calendar years to be 52,472,682 gallons, 48,511,673 gallons, 44,100,398 gallons, respectively. On or about March 4, 2008, a permit application was submitted to the Department requesting an increase of the throughput for EQT083. The Permit Modification dated January 28, 2011, increased the throughput for EQT083 to 48,000,000 gallons. The exceedance of a permitted emission limit is a violation of Part 70 General Condition C of Title V Permit No. 0180-00003-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

On or about September 30, 2008, through October 2, 2008, a Chemical Accident Prevention Plan (CAPP) inspection of the Respondent's facility was performed to determine the degree of compliance with the Act and the Air Quality Regulations.

While the Departments investigation is not yet complete, the following violation was noted during the course of the inspection:

The Respondent failed to document each inspection or test that had been performed for FSL-25304, the flow switch on spray convey lube oil pump discharge. Specifically, the facility was unable to provide the inspector with the two most recent inspection records for FSL-25304. Each failure to document inspections or tests performed on FSL-25304 is a violation of 40 CFR 68.73(d)(4), which language has been adopted as a Louisiana Regulation in LAC 33:III.5901.A, Title V Permit No. 0180-00003-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

On or about March 28, 2012, through March 30, 2012, an inspection of the Respondent's facility was performed to determine the degree of compliance with the Act and the Air Quality Regulations.

While the Department's investigation is not yet complete, the following violations were noted during the course of the inspection:

During the 2010 and 2011 monitoring period, the Respondent exceeded the throughput and the permitted particulate matter (PM) emission limit for Emission Point No. FUG0020, Lime Sludge Loading Fugitives as follows:

| YEAR | PERMIT NO. | PERMITTED LIMITS (tons) | ACTUAL EMISSIONS (tons) |
|------|---------------|-------------------------|-------------------------|
| 2010 | 0180-00003-V1 | Throughput: 12,000 | 20,108 |
| | | PM ₁₀ : 1.32 | 2.21 |
| 2011 | 0180-00003-V3 | Throughput: 12,000 | 18,765 |
| | | PM ₁₀ : 1.32 | 2.06 |

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

On or about September 1, 2012, 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 from January 1, 2007 through September 1, 2012. While the review is not complete, the

Department noted the violations found in paragraphs VI-XVI of the Findings of Fact portion of this enforcement action.

On or about August 2, 2012, the Department requested additional information on Incident Nos. T102485, 106528, and 122561. Specifically the reports were incomplete and did not include all required information according to LAC 33:I.3925.B. On or about December 14 and 17, 2012, the Respondent submitted updated Unauthorized Discharge Notifications for the three (3) incidents.

The Respondent reported the following unauthorized releases:

| | REPORT (date) | SOURCE OF RELEASE | INCIDENT DATE | POLLUTANTS RELEASED | QUANTITY REPORTED | REPORTED CIRCUMSTANCE |
|----|--|--|-------------------------------------|-----------------------------|-------------------|---|
| A. | Unauthorized Discharge Notification for T102485 (1/28/2008) | Gasket on 2 nd stage preheater from east side of Fluorocarbons Multi-Products Plant | 1/22/2008 (48 minutes) | Anhydrous hydrogen fluoride | 1110 lbs | Leak from head gasket. |
| B. | Unauthorized Discharge Notification for T104366 (4/4/2008) | Emergency Vent Scrubber | 3/31/2008 (18 minutes) | Hydrogen Fluoride | 76 lbs | The automated minus control valve controlling Furnace 3 and 4 malfunctioned to the closed position which caused the furnaces to overpressure. |
| C. | Unauthorized Discharge Notification for T104980 (4/24/2008) | Process Equipment in the 245fa Plant | 4/17/2008 (2 hours) | Hydrogen Fluoride | 81 lbs | Leak in process equipment. |
| D. | Unauthorized Discharge Notification for T106528 (6/24/2008) | Process Equipment in HFC-245fa Plant | 6/18/2008 (34 minutes) | Hydrogen Fluoride | 102 lbs | Leak in process equipment. |
| | | | | Hydrochloric Acid | 65 lbs | |
| E. | Unauthorized Discharge Notification for T122561 (4/12/2010) | Process piping in the Fluorocarbons 245fa Plant | 4/5/2010 (10 minutes) | Chlorine | 48 lbs | Sudden release of gaseous process material from an isolated section of process piping. |
| | | | | Hydrogen Fluoride | 3 lbs | |
| F. | Unauthorized Discharge Notification for T123736 (6/1/2010) | Sample valve in the 245fa Plant | 5/25/2010 (15 minutes) | Hydrogen Fluoride | 42 lbs | Malfunctioning sample valve. |
| G. | Unauthorized Discharge Notification for T126080 (9/3/2010) | HF Plant Process Equipment | 8/31/2010 (15 minutes) | Hydrogen Fluoride | 63 lbs | Leak in process equipment. |
| H. | Unauthorized Discharge Notification for T134877 (6/6/2012) | 90 degree elbow on chlorine feed line to Reactor A | 10/25/2011 (3 minutes) | Chlorine | 4.5 lbs | A 90 degree elbow on the chlorine feed line failed causing chlorine gas to be released into the atmosphere. There was one injury requiring off site medical evaluation. |
| I. | Unauthorized Discharge Notification for T136064 (12/28/2011) | Process flange | 12/22/2011 (2 hours and 35 minutes) | Hydrogen Fluoride | 15.6 lbs | Leak on process flange. |

The Respondent failed to provide all required information in the written notification reports according to LAC 33:I.3925.B. Specifically, the Respondent failed to document the following:

details of the circumstances (unauthorized discharge description and root cause) and events leading to any unauthorized discharge, the permitted release point (if applicable), a statement as to whether any permit limits were exceeded, procedures or measures which have or will be adopted to prevent recurrence of the incident, and a determination by the discharger of whether or not the discharge was preventable, and if not, an explanation of why the discharge was not preventable. Each incident of the Respondent's failure to submit a complete written notification to the Department is a violation of LAC 33:I.3925.B, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

The Respondent reported the following unauthorized releases:

| | REPORT (date) | EMISSION POINT | INCIDENT DATE | POLLUTANTS RELEASED | QUANTITY REPORTED | REPORTED CAUSE | REGULATORY or PERMIT REQUIREMENTS |
|----|--|--|------------------------|-----------------------------|-------------------|---|-----------------------------------|
| A. | Unauthorized Discharge Notification for Incident No. T100058 (10/15/2007) | 245 fa Process Area | 10/9/2007 (11 minutes) | Hydrogen Chloride | 3.5 lbs | The release was caused by contact personnel inadvertently cutting into a section of four-inch process piping. | LAC 33:III.905 |
| | | | | Hydrogen Fluoride | 7.8 lbs | | |
| B. | Unauthorized Discharge Notification for T102485 (1/28/2008) & Updated Unauthorized Discharge Notification (12/17/2012) | Gasket on 2 nd stage preheater from east side of Fluorocarbons Multi-Products Plant | 1/22/2008 (48 minutes) | Anhydrous hydrogen fluoride | 1110 lbs | During maintenance on process equipment, raw material feeds were closed off from the second stage vaporizer/superheater, but recycle flows were still being maintained at the first stage vaporizer/superheater. The residual oxygen and organic process materials auto ignited which resulted in the gasket failure. | LAC 33:III.905 |
| C. | Unauthorized Discharge Notification for T106528 (6/24/2008) & Updated Unauthorized Discharge Notification (12/17/2012) | Process Equipment in HFC-245fa Plant | 6/18/2008 (34 minutes) | Hydrogen Fluoride | 102 lbs | Leak in process equipment. The release was caused by the failure of Teflon lined two piece metal body instrument tee attached to the catalyst stripper. | LAC 33:III.905 |
| | | | | Hydrochloric Acid | 65 lbs | | |
| D. | Unauthorized Discharge Notification for T122561 (4/12/2010) & Updated Unauthorized Discharge Notification (12/14/2012) | Process piping in the Fluorocarbons 245fa Plant | 4/5/2010 (10 minutes) | Chlorine | 48 lbs | Sudden release of gaseous process material from an isolated section of process piping. The failure of the piping was caused by external corrosion of the piping system at a weep hole. | LAC 33:III.905 |
| | | | | Hydrogen Fluoride | 3 lbs | | |

Each unauthorized release of emissions 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).

The Emission Point No. EQT007, 89-15/HF Tail Gas Scrubber System, is required to achieve 99% removal efficiency for Hydrogen Fluoride (HF) by maintaining the minimum liquid flow rate

established according to 40 CFR 63 Subpart YY. According to the Notification of Compliance Status dated December 11, 2012, the HF Tail Gas Scrubber efficiency design evaluation established a minimum liquid flow rate of 40 gallons per minute (gpm). The Respondent reported following violations from the 40 gpm flowrate:

| | REPORT (date) | INCIDENT DATE | THE DAILY AVERAGE FLOW RATE in gpm |
|----|--|---------------|---------------------------------------|
| A. | 2008 1 st Semiannual Monitoring Report (9/30/2008) & 2008 1 st Semiannual Compliance Report for 40 CFR Part 63, Subpart YY (9/30/2008) | 1/16/2008 | 29 |
| B. | | 1/17/2008 | 30 |
| C. | | 1/18/2008 | 30 |
| D. | | 3/11/2008 | 35 |
| E. | | 3/24/2008 | 33 |

Each failure to maintain the scrubber flow for EQT007 to achieve 99 percent removal efficiency for HF is a violation of 40 CFR 63.1103(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5311, Specific Requirement 9 of Title V Permit No. 2394-V0, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent reported that once through water scrubber did not achieve 99% MON operation efficiency requirement for hydrogen halides and halogens during one step of the regeneration process for Emission Point No. RLP011, 2-93 Reactor Regen Stack as follows:

| | REPORT (date) | TIMEFRAME | DURATION |
|----|---|-------------------------|----------|
| A. | 2008 Title V Annual Compliance Certification (3/27/2009) | 2/21/2008 - 2/22/2008 | 17 hours |
| B. | 2008 2 nd Semi-Annual Monitoring Report (3/27/2009) | 11/15/2008 - 11/16/2008 | 14 hours |

Each failure to achieve 99% reduction by weight is a violation of 40 CFR 63.2455(a) which language has been adopted as a Louisiana regulation in Title V Permit No. 0180-00003-V1, Specific Requirement 741, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent reported violations of permitted operating parameters or the operation outside of the design efficiency for multiple scrubbers as follows:

| | REPORT (date) | PERMIT NUMBER | EMISSION POINT | PERMIT REQUIREMENT or DESIGN EFFICIENCY | TOTAL # OF HOURS OUT OF RANGE | REGULATORY or PERMIT REQUIREMENTS |
|----|---|------------------|---|---|-------------------------------------|--|
| A. | Annual 2007 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-93 Thermal Oxidizer #1 (EQT 067) | 2nd Stage Scrubber Flow Rate of Caustic Solution at ≥ 20 gpm | 46 | Specific Requirement 12 & Specific Requirement 20 40 CFR 63.2455(a) |
| B. | Annual 2007 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-93 Thermal Oxidizer #1 (EQT 067) | 2nd Stage pH ≥ 7.0 s.u. | 15 | Specific Requirement 13 & Specific Requirement 20 40 CFR 63.2455(a) |
| C. | Annual 2007 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-00 Thermal Oxidizer #2 (EQT 074) | 2nd Stage Scrubber Flow Rate of Caustic Solution at ≥ 20 gpm | 50 | Specific Requirement 83 & Specific Requirement 90 40 CFR 63.2455(a) |
| D. | Annual 2007 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 8-00 Catalyst Regeneration Scrubber (EQT 094) | 1 st Stage Scrubber Flow Rate of Caustic Solution at ≥ 5 gpm | 258 | LAC 33:III.501.C.4 |
| E. | Annual 2007 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 2-93 Reactor Regen Stack (RLP 006 and 011) | Water Scrubbing Agent Flow Rate of ≥ 5 gpm | 545 | Specific Requirement 725 40 CFR 63.2455(a) |
| F. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-93 Thermal Oxidizer #1 (EQT 067) | 2nd Stage Scrubber Flow Rate of Caustic Solution at ≥ 20 gpm | 39 | Specific Requirement 12 & Specific Requirement 20 40 CFR 63.2455(a) |
| G. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-93 Thermal Oxidizer #1 (EQT 067) | 2nd Stage pH ≥ 7.0 s.u. | 17 | Specific Requirement 13 & Specific Requirement 20 40 CFR 63.2455(a) |
| H. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-00 Thermal Oxidizer #2 (EQT 074) | 2nd Stage Scrubber Flow Rate of Caustic Solution at ≥ 20 gpm | 63 | Specific Requirement 83 & Specific Requirement 90 40 CFR 63.2455(a) |
| I. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 8-00 Catalyst Regeneration Scrubber (EQT 094) | 1 st Stage Scrubber Flow Rate of Caustic Solution at ≥ 5 gpm | 454 | LAC 33:III.501.C.4 |
| J. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 8-00 Catalyst Regeneration Scrubber (EQT 094) | 2 nd Stage Scrubber Flow Rate of Caustic Solution at ≥ 6 gpm | 5 | LAC 33:III.501.C.4 |
| K. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 1-95 HCl Fume Scrubber #1 (EQT 0071) | Caustic Scrubbing Agent Flow Rate of ≥ 3.7 gpm | 36 | Specific Requirement 52 40 CFR 63.9000(a) |
| L. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 1-95 HCl Fume Scrubber #1 (EQT 0071) | pH ≥ 7.0 s.u | 24 | Specific Requirement 46 & Specific Requirement 52 40 CFR 63.9000(a) |
| M. | Annual 2008 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 2-93 Reactor Regen Stack (RLP 006 and 011) | Water Scrubbing Agent Flow Rate of ≥ 5 gpm | 776 | Specific Requirement 725 40 CFR 63.2455(a) |
| N. | Annual 2009 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-93 Thermal Oxidizer #1 (EQT 067) | 1st Stage Scrubber Flow Rate of Caustic Solution at ≥ 20 gpm | 14 | Specific Requirement 11 & Specific Requirement 20 40 CFR 63.2455(a) |
| O. | Annual 2010 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 6-93 Thermal Oxidizer #1 (EQT 067) | 2nd Stage Scrubber Flow Rate of Caustic Solution at ≥ 20 gpm | 14 | Specific Requirement 12 & Specific Requirement 20 40 CFR 63.2455(a) |
| P. | Annual 2010 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 8-00 Catalyst Regeneration Scrubber (EQT 094) | 1 st Stage Scrubber Flow Rate of Caustic Solution at ≥ 5 gpm | 2 | LAC 33:III.501.C.4 |

| | REPORT (date) | PERMIT NUMBER | EMISSION POINT | PERMIT REQUIREMENT or DESIGN EFFICIENCY | TOTAL # OF HOURS OUT OF RANGE | REGULATORY or PERMIT REQUIREMENTS |
|----|---|---------------|--|--|-------------------------------|---|
| Q. | Annual 2010 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 1-95 HCl Fume Scrubber #1 (EQT 0071) | pH ≥ 7.0 s.u | 23 | Specific Requirement 46 & Specific Requirement 52 40 CFR 63.9000(a) |
| R. | Annual 2010 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 1-95 HCl Fume Scrubber #1 (EQT 0071) | Caustic Scrubbing Agent Flow Rate of ≥ 3.7 gpm | 47 | Specific Requirement 52 40 CFR 63.9000(a) |
| S. | Annual 2010 Scrubber Downtime Report (12/11/2012) | 0180-00003-V1 | EPN 2-93 Reactor Regen Stack (RLP 006 and 011) | Water Scrubbing Agent Flow Rate of ≥ 5 gpm | 100 | Specific Requirement 725 40 CFR 63.2455(a) |

Each failure to operate within the permitted requirement or design efficiency 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).

The Respondent reported the following violations from monitoring requirements:

| | REPORT (date) | PERMIT NUMBER | EMISSION POINT | DURATION | MONITORING PARAMETER | REPORTED CAUSE | REGULATORY or PERMIT REQUIREMENTS |
|----|---|---------------|--|------------------------------|--|--|-----------------------------------|
| A. | 2007 Title V Annual Compliance Certification (3/31/2008) | 2394-V0 | 89-51/Lime Storage Silo 1 (EQT011) | 1/1/2007 - 1/8/2007 (8 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks shall be kept onsite. | Failed to Document Visual Inspection. | Specific Requirement 12 |
| B. | 2007 Title V Annual Compliance Certification (3/31/2008) | 2394-V0 | 89-54/Fluorspar Dryer (EQT012) | 1/1/2007 - 1/8/2007 (8 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks shall be kept onsite. | Failed to Document Visual Inspection. | Specific Requirement 17 |
| C. | 2007 Title V Annual Compliance Certification (3/31/2008) | 2394-V0 | 89-62/Clarifier Lime Silo (EQT018) | 1/1/2007 - 1/8/2007 (8 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks shall be kept onsite. | Failed to Document Visual Inspection. | Specific Requirement 21 |
| D. | 2007 Title V Annual Compliance Certification (3/31/2008) | 2394-V0 | 89-47, 89-48, and 89-58/Fluorspar Silos (GRP012) | 1/1/2007 - 1/8/2007 (8 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks shall be kept onsite. | Failed to Document Visual Inspection. | Specific Requirement 160 |
| E. | 2007 Title V 2 nd Semiannual Monitoring Report (3/31/2008) | 0180-00003-V1 | 1-93 Lime Silo (EQT065) | 8/22/2007 (1 day) | Filter Vents: Visible emissions monitored by visual inspection/determination daily. | Date missing from inspection record log. | Specific Requirement 4 |
| F. | 2007 Title V 2 nd Semiannual Monitoring Report (3/31/2008) | 0180-00003-V1 | 1-93 Lime Silo (EQT065) | 8/23/2007 (1 day) | Filter Vents: Visible emissions monitored by visual inspection/determination daily. | Date missing from inspection record log. | Specific Requirement 4 |
| G. | 2007 Title V 2 nd Semiannual Monitoring Report (3/31/2008) | 0180-00003-V1 | 1-93 Lime Silo (EQT065) | 11/8/2007 (1 day) | Filter Vents: Visible emissions monitored by visual inspection/determination daily. | Date missing from inspection record log. | Specific Requirement 4 |
| H. | 2008 Title V 1 st Semiannual Monitoring Report (9/30/2008) | 2394-V0 | 89-51 Lime Storage Silo 1 (EQT011) | 1/1/2008 - 1/5/2008 (5 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Opacity Inspection. | Specific Requirement 12 |

| | REPORT (date) | PERMIT NUMBER | EMISSION POINT | DURATION | MONITORING PARAMETER | REPORTED CAUSE | REGULATORY or PERMIT REQUIREMENTS |
|----|--|------------------|--|---|--|---|--|
| I. | 2008 Title V 1 st Semiannual Monitoring Report (9/30/2008) | 2394-V0 | 89-62 Clarifier Lime Silo (EQT018) | 1/1/2008 - 1/5/2008 (5 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Opacity Inspection. | Specific Requirement 21 |
| J. | 2008 Title V 1 st Semiannual Monitoring Report (9/30/2008) | 2394-V0 | 89-54 Fluorspar Dryer (EQT012) | 1/1/2008 - 1/5/2008 (5 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Opacity Inspection. | Specific Requirement 17 |
| K. | 2008 Title V 1 st Semiannual Monitoring Report (9/30/2008) | 2394-V0 | 89-47, 89-48, 89-58 Fluorspar Silos (GRP012) | 1-1-2008 - 1/5/2008 (5 days) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Opacity Inspection. | Specific Requirement 160 |
| L. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-51 Lime Storage Silo 1 (EQT011) | 10/26/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 12 |
| M. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-54 Fluorspar Dryer (EQT012) | 10/26/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 17 |
| N. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-62 Clarifier Lime Silo (EQT018) | 10/26/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 21 |
| O. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-47, 89-48, 89-58 Fluorspar Silos (GRP012) | 10/26/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 160 |
| P. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-15 Lime Storage Silo 1 (EQT011) | 12/24/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 12 |
| Q. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-54 Fluorspar Dryer (EQT012) | 12/24/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 17 |
| R. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-62 Clarifier Lime Silo (EQT018) | 12/24/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 21 |
| S. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-47, 89-48, 89-58 Fluorspar Silos (GRP012) | 12/24/2008 (1 day) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections of the dust filters shall be kept on site. | Failed to Document Visual Inspection. | Specific Requirement 160 |
| T. | 2011 Title V 2 nd Semiannual Monitoring Report (3/30/2012) | 2394-V2 | Fluorspar Silos (CRG0002) | 11/11/2011 - 11/14/2011 (72 hours) | Visible Emission monitored by technically sound method daily. | Missed inspection. | Specific Requirement 5 40 CFR 64.6(c)(1) |

| | REPORT (date) | PERMIT NUMBER | EMISSION POINT | DURATION | MONITORING PARAMETER | REPORTED CAUSE | REGULATORY or PERMIT REQUIREMENTS |
|----|---|---------------|-------------------------------------|------------------------------------|--|--------------------------------|--|
| U. | 2011 Title V 2 nd Semiannual Monitoring Report (3/30/2012) | 2394-V2 | 89-51/Lime Storage Silo 1 (EQT0011) | 11/11/2011 - 11/14/2011 (72 hours) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks shall be kept on site. | Failed to document inspection. | Specific Requirement 66 |
| V. | 2011 Title V 2 nd Semiannual Monitoring Report (3/30/2012) | 2394-V2 | 89-54/Fluorspar Dryer (EQT0012) | 11/11/2011 - 11/14/2011 (72 hours) | Visible Emission monitored by technically sound method daily; Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks and maintenance inspections shall be kept on site. | Missed inspection. | Specific Requirement 68 40 CFR 64.6(c)(1) & Specific Requirement 83 |
| W. | 2011 Title V 2 nd Semiannual Monitoring Report (3/30/2012) | 2394-V2 | Clarifier Lime Silo (EQT0018) | 11/11/2011 - 11/14/2011 (72 hours) | Vents shall be visually inspected for opacity on a daily basis. Records of opacity checks shall be kept on site. | Failed to document inspection. | Specific Requirement 87 |

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).

The Respondent reported the following emission sources had potential emissions higher than permitted value as a result of calculation error. The Respondent was issued temporary operating variances on February 6, 2009, August 28, 2009, February 25, 2010, and September 9, 2010, authorizing the level of emissions that would occur as a result of regeneration and pretreatment events. The latter variance expired on January 28, 2011 upon issuance of Permit No. 0180-00003-V2.

| | REPORT (date) | EMISSION POINT | DURATION | POLLUTANT | PERMIT LIMIT IN 0180-00003-V1 (tpy) | ACTUAL EMISSIONS (tpy) |
|----|--|--|-----------------------|-----------|-------------------------------------|------------------------|
| A. | 2008 Title V Annual Compliance Certification (3/27/2009) | 8-00/Catalyst Regeneration Scrubber (EQT094) | 1/1/2008 - 12/31/2008 | HF | 0.001 | 0.01 |
| | | | | HCl | Unpermitted | 0.00002 |
| B. | 2008 Title V Annual Compliance Certification (3/27/2009) | 2-93 Reactor Regen Stack (RLP011) | 1/1/2008 - 12/31/2008 | HF | 0.01 | 0.43 |
| | | | | HCl | Unpermitted | 0.00006 |
| C. | 2008 Title V Annual Compliance Certification (3/27/2009) | 6-03 Thermal Oxidizer Cap (GRP025) | 1/1/2008 - 12/31/2008 | HF | 5.65 | 11.64 |
| | | | | HCl | 0.03 | 5.74 |
| D. | 2008 Title V Annual Compliance Certification (3/27/2009) | GCVXII Activities/Catalyst Pretreatment | 1/1/2008 - 12/31/2008 | HF | 0.0025 ton/yr | 0.91 ton/yr |

Each emission exceedance is a violation of Title V Permit No. 0180-00003-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent reported the following violations from fugitive emission requirements:

| | REPORT (date) | PERMIT NUMBER | EMISSION POINT | DURATION | MONITORING PARAMETER | REPORTED VIOLATION | REGULATORY or PERMIT REQUIREMENTS |
|----|---|---------------|---|---|---|--|---|
| A. | 2007 Title V Annual Compliance Certification (3/31/2008) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 1/1/2007 - 2/17/2007 (48 Shifts) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| B. | 2007 Title V 2 nd Semiannual Monitoring Report (3/31/2008) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 7/1/2007 - 7/21/2007 (11 days) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| C. | 2008 Title V 1 st Semiannual Monitoring Report (9/30/2008) | 0180-00003-V1 | 3-03 Fugitives and Unloading Operations (FUG021) | 1/6/2008 - 4/15/2008 (15 weeks) | Weekly visual inspections of each pump in light liquid for indications of liquids dripping from the pump seal. | Date missing from inspection record log. | Specific Requirement 215 |
| D. | 2008 Title V 1 st Semiannual Monitoring Report (9/30/2008) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 1/1/2008 - 1/17/2008 (17 days) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| E. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 10/26/2008 (1 shift) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| F. | 2008 Title V 2 nd Semiannual Monitoring Report (3/27/2009) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 12/24/2008 (1 shift) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| G. | 2009 Title V 2 nd Semiannual Monitoring Report (9/28/2009) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 2/5/2009 (1 shift) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| H. | 2009 Title V 2 nd Semiannual Monitoring Report (9/28/2009) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 2/14/2009 (1 shift) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |

| | REPORT (date) | PERMIT NUMBER | EMISSION POINT | DURATION | MONITORING PARAMETER | REPORTED VIOLATION | REGULATORY or PERMIT REQUIREMENTS |
|----|---|---------------|---|------------------------------------|---|--|---|
| I. | 2009 Title V 2 nd Semiannual Monitoring Report (9/28/2009) | 2394-V0 | 89-64/HF Plant Fugitives, 2-96/HF Additives Unit 1 Fugitives, and 6-05/HF Additives Unit 2 Fugitives (GRP022) | 4/19/2009 (1 shift) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to Document Sensory Inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| J. | 2011 Title V 2 nd Semiannual Monitoring Report (3/30/2012) | 2394-V2 | 89-64/HF Plant Fugitive Emissions (FUG0001) | 10/20/2011 - 10/21/2011 (24 hours) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to perform inspection. | Specific Requirement 202 40 CFR 63.1103(c) |
| K. | 2011 Title V 2 nd Semiannual Monitoring Report (3/30/2012) | 2394-V2 | 2-96 HF Additives Unit 1 Fugitives | 10/20/2011 - 10/21/2011 (24 hours) | Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Perform sensory monitoring at least once every shift, but no later than within 15 days. | Failed to perform inspection. | Specific Requirement 202 40 CFR 63.1103(c) |

Each non-compliance of the fugitive emission requirements is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, LAC 33:III.2122.C.3, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

The Respondent failed to meet the following reporting requirements:

| | REPORT (date) | PERMIT NUMBER | REPORTING REQUIREMENT | DUE DATE | POSTMARK/HAND DELIVERED DATE | REGULATORY or PERMIT REQUIREMENTS |
|----|---|---------------|---|-----------|------------------------------|---|
| A. | 2007 Title V 1 st Semiannual Monitoring Report (11/14/2007) | 0180-00003-V1 | General Condition K-Semiannual reports shall be submitted by September 30 for the preceding period encompassing January through June. | 9/30/2007 | 11/16/2007 | Part 70 General Condition K Specific Requirement 715 |
| B. | 2007 Title V 1 st Semiannual Monitoring Report (11/14/2007) | 2394-V0 | General Condition K-Semiannual reports shall be submitted by September 30 for the preceding period encompassing January through June. | 9/30/2007 | 11/16/2007 | Part 70 General Condition K Specific Requirement 153 |
| C. | 2007 1 st Semiannual LDAR Report (11/14/2007) | 0180-00003-V1 | Semiannual reports shall be submitted on March 31 and September 30, to cover the periods July 1 through December 31, and January 1 to June 30, respectively. | 9/30/2007 | 11/16/2007 | State Only Specific Condition 1.E |
| D. | 2007 1 st Semiannual 40 CFR 63 Subpart YY Periodic Report (11/14/2007) | 2394-V0 | Owner or operator of the affected source subject to monitoring requirements where periodic reporting is specified shall submit a report no later than 60 days after the end of each 6-month period. | 9/30/2007 | 11/16/2007 | 40 CFR 63.1110(e)(2) Specific Requirement 143 |
| E. | 2007 1 st Semiannual 40 CFR 63 Subpart NNNNN (3/31/2008) | 0180-00003-V1 | For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6 (a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established. | 9/30/2007 | 3/31/2008 | 40 CFR 63.9050(b)(5) Specific Requirement 690 |

| | REPORT (date) | PERMIT NUMBER | REPORTING REQUIREMENT | DUE DATE | POSTMARK/HAND DELIVERED DATE | REGULATORY or PERMIT REQUIREMENTS |
|----|--|---------------|---|-----------|------------------------------|--|
| F. | 40 CFR 63 Subpart FFFF Compliance Status Report (12/30/2008) | 0180-00003-V1 | Submit Notification of Compliance Status Report: Due no later than 150 days after the compliance date specified in 40 CFR 63.2445. | 10/7/2008 | 12/31/2008 | Specific Requirement 687 Table 11 of 40 CFR 63.2520(a) |
| G. | 2007 Scrubber Downtime Specific Requirement Report | 0180-00003-V1 | Due annually, by the 31 st of March for the preceding calendar year. List the hours that the scrubber operated out of ranges specified. | 3/31/2008 | 12/12/2012 | Specific Requirements 18, 51, 89, 131, and 193 |
| H. | 2007 Title V Annual Cap Report | 0180-00003-V1 | A report showing the overall calculated emissions shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 st of each year for the preceding year. | 3/31/2008 | 12/6/2012 | Specific Requirements 610 and 612 |
| I. | 2008 Scrubber Downtime Specific Requirement Report | 0180-00003-V1 | Due annually, by the 31 st of March for the preceding calendar year. List the hours that the scrubber operated out of ranges specified. | 3/31/2009 | 12/12/2012 | Specific Requirements 18, 51, 89, 131, and 193 |
| J. | 2008 Title V Annual Cap Report | 0180-00003-V1 | A report showing the overall calculated emissions shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 st of each year for the preceding year. | 3/31/2009 | 12/6/2012 | Specific Requirements 610 and 612 |
| K. | 2009 Scrubber Downtime Specific Requirement Report | 0180-00003-V1 | Due annually, by the 31 st of March for the preceding calendar year. List the hours that the scrubber operated out of ranges specified. | 3/31/2010 | 12/12/2012 | Specific Requirements 18, 51, 89, 131, and 193 |
| L. | 2009 Title V Annual Cap Report | 0180-00003-V1 | A report showing the overall calculated emissions shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 st of each year for the preceding year. | 3/31/2010 | 12/6/2012 | Specific Requirements 610 and 612 |
| M. | 2010 Scrubber Downtime Specific Requirement Report | 0180-00003-V1 | Due annually, by the 31 st of March for the preceding calendar year. List the hours that the scrubber operated out of ranges specified. | 3/31/2011 | 12/12/2012 | Specific Requirements 18, 51, 89, 131, and 193 |
| N. | 2010 Title V Annual Cap Report | 0180-00003-V1 | A report showing the overall calculated emissions shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 st of each year for the preceding year. | 3/31/2011 | 12/6/2012 | Specific Requirements 610 and 612 |

Each failure to comply with the 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).

The Respondent reported the following unauthorized discharges:

| | REPORT (date) | EMISSION POINT | INCIDENT DATE | POLLUTANTS RELEASED | QUANTITY REPORTED | REPORTED CIRCUMSTANCES |
|----|--|--|------------------------|---------------------|-------------------|--|
| A. | Unauthorized Discharge Notification for T96688 (6/6/2007) | HCl Storage Tank | 5/31/2007 (5 minutes) | HCl | 26 lbs | Vapor leak from pressure relief system. Secured release by removing HCl feed from the tank which allowed relief system to reset. |
| B. | Unauthorized Discharge Notification for T116169 (7/7/2009) | HCL Storage Tank Conservation Vents | 7/2/2009 (50 minutes) | Hydrogen Chloride | 643 lbs | Plugged line on the main header to the control device. |
| C. | Unauthorized Discharge Notification for T125284 (8/4/2010) | Pressure relief system on HCl Storage Tank | 7/30/2010 (10 minutes) | Hydrogen Chloride | 284 lbs | Operations personnel observed vapors emitting from the pressure relief system. |

The Respondent reported in the 2011 Scrubber Downtime Report dated December 11, 2012, that multiple scrubbers operated out of a permitted operating range specified in Title V Permit No. 0180-00003-V3 as follows:

| | EMISSION POINT | TOTAL NUMBER OF HOURS OUT OF RANGE |
|----|--|------------------------------------|
| A. | 2-09 Catalyst Pretreatment (ACT 0001) | 20 |
| B. | 6-09 MPP On-Line Catalyst Regeneration (ACT 0003) | 23 |
| C. | 7-09 G-125 On-Line Catalyst Regeneration (ACT 0005) | 3 |
| D. | 1-95 HCl Fume Scrubber #1 (EQT 0071) | 17 |
| E. | 2-93 Reactor Regen Stack (RLP 0006) | 11 |

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 (\$75,000.00) of which Three Thousand Eight Hundred Sixteen and 30/100 Dollars (\$3,816.30) 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 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 Ascension 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.

HONEYWELL INTERNATIONAL INC.

BY: Casey Smithhart
(Signature)

CASEY SMITHHART
(Printed)

TITLE: PLANT MANAGER

THUS DONE AND SIGNED in duplicate original before me this 3rd day of NOVEMBER, 20 15, at GEISMAR.

Jane S. Lee
NOTARY PUBLIC (ID # 132360)

(stamped or printed)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Peggy M. Hatch Secretary

BY: D. Chance McNeely
D. Chance McNeely, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 5th day of Jan, 20 16, at Baton Rouge, Louisiana.

Perry Theriot
NOTARY PUBLIC (ID # 19181)

Perry Theriot
(stamped or printed)

Approved: D. Chance McNeely
D. Chance McNeely, Assistant Secretary