

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

WOMAN'S HOSPITAL FOUNDATION

AI # 181423

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

* Settlement Tracking No.
* SA-HE-22-0078
*
* Enforcement Tracking Nos.
* HE-CN-20-00075
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SETTLEMENT

The following Settlement is hereby agreed to between Woman's Hospital Foundation ("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 non-profit corporation that owns and/or operates a hospital located in Baton Rouge, East Baton Rouge Parish, Louisiana ("the Facility").

II

On June 10, 2020, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. HE-CN-20-00075 (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 FOUR THOUSAND SEVEN HUNDRED AND NO/100 DOLLARS (\$4,700.00), of which One Thousand Four Hundred Fifty-Nine and 11/100 Dollars (\$1,459.11) 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 inspection report(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VI

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

VII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties

set forth in La. R. S. 30:2025(E) of the Act.

VIII

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

IX

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

X

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

XI

In consideration of the above, any claims for penalties are hereby compromised and settled

in accordance with the terms of this Settlement.

XII

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

WOMAN'S HOSPITAL FOUNDATION

BY: *Kent M. Scott*
(Signature)

Kent M. Scott
(Printed)

TITLE: Senior Vice President / COO

THUS DONE AND SIGNED in duplicate original before me this 10th day of February, 20 23, at Baton Rouge, LA.

Cindy M. Amodeo
NOTARY PUBLIC (ID # 31597)
Cindy M. Amodeo
Notary Public
Bar Roll # 31597
State of Louisiana
My Commission Is For Life
(stamped or printed)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Roger W. Gingles, Secretary

BY: *Celena J. Cage*
Celena J. Cage, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 31st day of May, 20 23, at Baton Rouge, Louisiana.

Jay Glorioso
NOTARY PUBLIC (ID # 66881)
Jay L. Glorioso
(stamped or printed)

Approved: *Celena J. Cage*
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

JUN 10 2020

CERTIFIED MAIL (7018 1830 0000 5751 7054)
RETURN RECEIPT REQUESTED

WOMAN'S HOSPITAL FOUNDATION
c/o Stephanie H. Anderson
Agent for Service of Process
100 Woman's Way
Baton Rouge, LA 70817

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. HE-CN-20-00075
AGENCY INTEREST NO. 181423**

Dear 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 **WOMAN'S HOSPITAL FOUNDATION (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 Jennifer Boudreaux at (225) 219-3636 or at Jennifer.Boudreaux@la.gov.

Sincerely,

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

Celena J. Cage
Administrator
Enforcement Division

CJC/JMB/jmb
Alt ID No. LAR000075366
Attachment



STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF	*	
	*	
WOMAN'S HOSPITAL FOUNDATION	*	ENFORCEMENT TRACKING NO.
EAST BATON ROUGE PARISH	*	
ALT ID NO. LAR000075366	*	HE-CN-20-00075
	*	
	*	AGENCY INTEREST NO.
PROCEEDINGS UNDER THE LOUISIANA	*	
ENVIRONMENTAL QUALITY ACT,	*	181423
La. R.S. 30:2001, ET SEQ.	*	

CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **WOMAN'S HOSPITAL FOUNDATION (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 Woman's Hospital (the facility), a hospital that specializes in the care of women and babies, located at 100 Woman's Way in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility notified the Department as a small quantity generator of hazardous waste and operates under the EPA facility identification number LAR000075366.

II.

On or about September 10, 2019, the Department conducted an inspection at the Respondent's facility to determine the degree of compliance with the Hazardous Waste Regulations and the Act. While the Department's investigation is not yet complete, the following violations were noted at the time of the inspection:

A. The Respondent stored regulated hazardous waste for more than 180 days without a

permit or other authorization as specified in LAC 33:V.1109.E.9, in violation of LAC 33:V.303.B. Specifically, at the time of the September 10, 2019 inspection, the Respondent stored two (2) approximately fifty-five (55) to sixty (60) gallon drums and one (1) five (5) gallon bucket of hazardous waste for more than 180 days. Each of these three (3) containers were stored in the facility's less than 180-day storage area, were closed, labeled "Hazardous Waste", and marked with an accumulation start date. The hazardous waste stored in two (2) of the aforementioned containers was accumulated for longer than one (1) year. At the time of the inspection, the hazardous waste stored in the following containers was accumulated for longer than 180 days:

1. A five (5) gallon bucket of mercury waste (D009) was stored for 700 days after its accumulation start date of October 10, 2017.
2. An approximately fifty-five (55) to sixty (60) gallon drum of bulk chemotherapy waste (D001, U010, and U058) was stored for 455 days after its accumulation start date of June 12, 2018.
3. An approximately fifty-five (55) to sixty (60) gallon drum of aerosols (D001) was stored for 224 days after its accumulation start date of January 29, 2019.

The Respondent submitted written responses to the Department on September 12, 2019, and March 19, 2020, stating that these three (3) containers of hazardous waste were properly disposed on September 11, 2019. The Respondent submitted copies of signed hazardous waste manifest numbers 013613793 FLE and 013613791 FLE, respectively.

- B. The Respondent failed to store waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps, in violation of LAC 33:V.3821.D.1. Specifically, at the time of the inspection, the Respondent had accumulated approximately six (6) universal waste lamps in the Hazardous Materials Room that were not stored in a container. The Respondent submitted a written response to the Department dated September 16, 2019, stating the Respondent developed a process for mercury bulb disposal and storage, and that Safety Kleen would deliver boxes for storage of the bulbs. The Respondent submitted a written response dated March 19, 2020, stating the universal waste lamps were properly disposed on or about September 24, 2019. The Respondent also submitted copies of signed hazardous waste manifest numbers 7021672 SKS and

7021691 SKS in the March 19, 2020 response.

- C. The Respondent failed to label or clearly mark universal waste lamps or a container in which the lamps are contained with any one of the following phrases: "Universal Waste – Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)," in violation of LAC 33:V.3823.A.6. Specifically, at the time of the inspection, the Respondent had accumulated approximately six (6) universal waste lamps in the Hazardous Materials Room that were not labeled. The Respondent submitted a written response dated March 19, 2020, stating the universal waste lamps were properly disposed on or about September 24, 2019. The Respondent also submitted copies of signed hazardous waste manifest numbers 7021672 SKS and 7021691 SKS in the March 19, 2020 response.
- D. The Respondent failed to perform hazardous waste determinations for waste materials at the facility, in violation of LAC 33:V.1103.B. Specifically, the Respondent failed to determine whether electronic devices including but not limited to a printer, a keyboard, and other electrical devices disposed by the facility were a hazardous waste. At the time of the September 10, 2019 inspection, the aforementioned devices were observed in a dumpster located outside the loading dock at the facility.
- E. The Respondent failed to keep hazardous waste containers closed during storage, except when necessary to add or remove hazardous waste as specified in LAC 33:V.2107.A, in violation of LAC 33:V.1109.E.7.a. Specifically, during the September 10, 2019 inspection, the Department observed one (1) five (5) gallon container of spent solvents (D001 and F003) in the Cytology Lab which was not properly closed. The container was labeled "Hazardous Waste" and marked with an accumulation start date; however, the cap of the container had been removed and an open-top funnel was placed in the container opening. No hazardous waste was being added to or removed from the container at the time of the inspection.
- F. The Respondent failed to conduct weekly inspections of its hazardous waste containers as specified in LAC 33:V.2109.A, in violation of LAC 33:V.1109.E.7.a. Specifically, at the time of the September 10, 2019 inspection, a records review in facility's Hazardous Waste Material Room revealed the Respondent failed to conduct weekly inspections of its hazardous waste containers from at least September 2016 to December 3, 2018. A review of the hazardous waste manifests from September 2016

to December 2018 indicated the facility generated hazardous waste during that time period as a small quantity generator. At the time of the inspection, a representative of the Respondent stated the Respondent started conducting weekly inspections of its hazardous waste containers on or about December 3, 2018.

- G. The Respondent failed to keep a copy of each manifest signed for three (3) years or until a signed copy is received from the designated facility which received the waste in accordance with LAC 33:V.1107.D.1, in violation of LAC 33:V.1111.A.1. Specifically, at the time of the September 10, 2019 inspection, a review of the Respondent's hazardous waste manifests revealed there was no signed copy from the designated facility for fifteen (15) manifests signed by the generator between April 17, 2018 and December 18, 2018. On or about September 16, 2019, the Respondent submitted a written response to the Department which included copies of all fifteen (15) hazardous waste manifests signed by the designated facility which received the waste.
- H. The Respondent failed to notify the Office of Environmental Services within seven (7) days when the information submitted in the application for the identification number changed, in violation of LAC 33:V.1105.B. Specifically, at the time of the inspection, the site contact person listed on the HW-1 Form dated February 28, 2014, Pamela Lappin, had not been employed by the Respondent for approximately one (1) year. The Department received an updated HW-1 Form from the Respondent dated September 11, 2019, that listed the current site contact person.

COMPLIANCE ORDER

Based on the foregoing, the Respondent is **hereby ordered**:

I.

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

II.

To institute, immediately upon receipt of this **COMPLIANCE ORDER**, procedures to ensure all universal waste lamps or a container in which the lamps are contained are labeled or clearly marked with any one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

in accordance with LAC 33 V:3823.A.6.

III.

To perform, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a hazardous waste determination on the wastes specified in Findings of the Fact Paragraph II.D in accordance with LAC 33:V.1103, and institute procedures to ensure waste determinations are made on all waste generated. The results of the determination for the waste described in Findings of Fact Paragraph II.D shall be submitted to the Enforcement Division within fifteen (15) days of performing the waste determination. All waste shall be disposed of in accordance with the Hazardous Waste or Solid Waste regulations, whichever is applicable. Alternatively, the Respondent may elect to manage all universal waste electronics in accordance with LAC 33:V.Chapter 38.

IV.

To close, immediately upon receipt of this **COMPLIANCE ORDER**, all containers used to store hazardous waste except when necessary to add or remove waste in accordance with LAC 33:V.2107.A.

V.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Jennifer Boudreaux
Re: Enforcement Tracking No. HE-CN-20-00075
Agency Interest No. 181423

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-20-00075
Agency Interest No. 181423

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Division of Administrative Law (DAL) Procedural Rules. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with

this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

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

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Jennifer Boudreaux 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. 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 must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

v.

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

Baton Rouge, Louisiana, this 10th day of June, 2020.



Lourdes Hurralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Jennifer Boudreaux

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL COMPLIANCE
 ENFORCEMENT DIVISION CONSOLIDATED COMPLIANCE ORDER &
 POST OFFICE BOX 4312 NOTICE OF POTENTIAL PENALTY
 BATON ROUGE, LOUISIANA 70821 4312 REQUEST TO CLOSE



Enforcement Tracking No.	HE-CN-20-00075	Contact Name	Jennifer Boudreaux
Agency Interest (AI) No.	181423	Contact Phone No.	(225) 219-3636
Alternate ID No.	LAR000075366		
Respondent:	Woman's Hospital Foundation	Facility Name:	Woman's Hospital
	c/o Stephanie H. Anderson	Physical Location:	100 Woman's Way
	Agent for Service of Process		
	100 Woman's Way	City, State, Zip:	Baton Rouge, LA 70817
	Baton Rouge, LA 70817	Parish:	East Baton Rouge

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph V of the "Order" portion of the COMPLIANCE ORDER.		
All documents were submitted in accordance with Paragraph III of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1.Subpart1.Chapter7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (HE-CN-20-00075), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (HE-CN-20-00075), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> • Monetary component = \$ _____ • Beneficial Environmental Project (BEP) component (optional)= \$ _____ • DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (HE-CN-20-00075) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT		
<p><i>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.</i></p>		
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: Jennifer Boudreaux		