



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

NOV 15 2018

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7015 1520 0003 3990 7169

Mr. Donald Melancon
Manager
PSC Industrial Outsourcing LP
756 Geraldine Road
Gibson, LA 70356

Re: Request for Information pursuant to Section 3007 of RCRA
PSC Industrial Outsourcing LP, Gibson, LA; and
Subpoena Pursuant to Section 11 of the Toxic Substances Control Act

Dear Mr. Melancon:

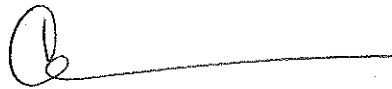
Enclosed is an Information Request ("Request") issued to PSC Industrial Outsourcing LP, ("PSC") regarding its facility located at 756 Geraldine Road, Gibson, LA 70356. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k. PSC must respond to this Request within fourteen (14) calendar days of receipt of this letter. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

The EPA is also evaluating the compliance of PSC with the PCB regulations found at 40 C.F.R. Part 761. Under the provisions of Section 11(c) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2610(c), EPA has the authority to require the attendance and testimony of witnesses, the production of reports, papers, documents, answers to questions, and any other information deemed necessary by the Administrator in carrying out the provisions of TSCA. Accordingly, PSC must provide the information and documents set forth in the enclosed SUBPOENA DUCES TECUM based on all information and documents in your possession, your custody or control, or the possession, custody, or control of your employees, agents, servants, or attorneys.

This Request and Subpoena Duces Tecum are not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 *et seq.* Your response to this Request should be sent to Bill Mansfield (6EN-H3) at the above address.

Please direct technical questions to Bill Mansfield of the Waste Enforcement Branch at (214) 665-8321, mansfield.william@epa.gov, and legal questions to Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343, moncrieffe.marcia@epa.gov. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be "C. Seager", followed by a long horizontal line extending to the right.

Cheryl T. Seager
Director
Compliance Assurance and
Enforcement Division

Enclosures

cc: craig.easley@la.gov

cc: phyllis.luke@la.gov

INFORMATION REQUEST RCRA 3007

The Environmental Protection Agency, Region 6 ("EPA") is investigating PSC Industrial Outsourcing LP's ("PSC's") compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby ordered to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA within fourteen (14) days of receipt of this Request.

If you anticipate that you will be unable to fully respond to this Request, you must submit a sworn affidavit or declaration by a responsible official within seven (7) calendar days of receipt of this Request specifying what information will be provided within fourteen (14) days, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which PSC must provide the responsive information. Furthermore, EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of PSC. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001 and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject PSC to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 Code of Federal Regulations ("C.F.R.") Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Bill Mansfield
Waste Enforcement Branch (6EN-H3)
Compliance Assurance and Enforcement Division
U.S. EPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.
2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.
3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy).
4. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret", "proprietary", or "company confidential". If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.
 - a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
 - b. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.
 - c. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a

governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

d. Is the information contained in any publicly accessible forums or materials such as the internet, databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. DEFINITIONS

The following definitions shall apply to the following words as they appear in Enclosure A:

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, both electronic and tangible, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra-office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any hard drive, flash drive, CD, DVD, or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such hard drive, flash drive, CD, DVD, or other type of

memory and together with printouts of such hard drive, flash drive, CD, DVD, or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

2. The term "PSC" includes any officer, director, agent, or employee of PSC, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
3. The term "you" or "yours" refers to PSC.
4. The term "Facility" shall mean the Facility located at 756 Geraldine Road, Gibson, LA 70356.
5. The terms "identify" or "identification" means, when used in reference to a natural person, to provide his or her name, present or last known address, present or last known employment position or affiliation, and positions or affiliations during the time covered by this Request.
6. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 282 and the federally authorized Louisiana Hazardous Waste Program, Title 33 of the Louisiana Administrative Code ("LAC") Part V, Chapters 1 through 51.
7. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Request, any information which might otherwise be construed to be outside its scope.
8. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
9. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

III. INFORMATION REQUESTED

1. Identify the person(s) answering these questions on behalf of PSC.
2. Provide the following information about PSC:
 - a. Respondent's legal name, address, and owner;

- b. Provide the place and date of PSC's formation;
- c. Provide the name and address of PSC's current registered agent for service of process;
- d. Please provide the names and addresses of all treatment, storage and/or disposal facilities used by PSC;
- e. Provide a copy of the initial and any subsequent Notification of Regulated Waste Activity (Form 8700-12) and RCRA Subtitle C site identification forms filed with the EPA and/or the Louisiana Department of Environmental Quality;
- f. Provide an overview of the operations and include your Standard Industrial Code ("SIC") or North American Industry Classification System ("NAICS") code;
- g. Provide a narrative description of the facility detailing the type and/or specified work function, that generates, ships or offers for transport any hazardous waste;
- h. Please indicate the date PSC began its operations at the Facility;
- i. Provide the number of employees at the Facility;
- j. Provide RCRA related training records for the last 3 years specific to each employee at Facility;
- k. Provide copies of the Facility's Contingency Plan, including its Emergency Procedures, maintained at the Facility for the last 3 years;
- l. For the last three years, please provide Land Disposal Restriction ("LDR") records prepared by PSC for each waste stream generated at the Facility and subject to LAC 33:V.2245, [40 C.F.R. § 268.7];
- m. Provide a copy of the flow diagram for each process(es) and unit(s) that generate each hazardous waste:
 - (i) Describe the function and use of each unit in the process diagrams;
 - (ii) Number and description of hazardous waste streams;
 - (iii) Identify all outputs from the process(es) and describe use, management, and disposition;

- n. Provide the following documentation regarding all hazardous waste determinations conducted on each solid waste stream:
 - (i) Provide analytical data and/or knowledge of process documentation kept as support, pursuant to LAC 33:V.1111.A, [40 C.F.R. § 262.40], for your hazardous waste determination in accordance with LAC 33:V.1103, [40 C.F.R. § 262.11], and LAC 33:V.2245, [40 C.F.R. § 268.7]; and
 - (ii) Please identify in your process diagram(s) the point of generation for which you collected your samples for hazardous waste determination or the point of generation that you identified for your hazardous waste determination based on knowledge of process.
 - o. Identify and describe how each hazardous waste is managed onsite (i.e., stored, treated, and/or recycled) prior to shipment. Dated photographs are helpful to confirm and support your answer to this question;
 - p. Identify how each hazardous waste was shipped and by whom until its final disposition at the treatment, storage and/or disposal facility;
 - q. Provide information regarding any specifications that each hazardous waste must meet as required by each treatment, storage and/or disposal facility. Further, please provide information regarding any shipments of hazardous waste that have been rejected by each treatment, storage and/or disposal facility;
 - r. Provide copies of LDR notifications sent to each treatment, storage and/or disposal facility for each hazardous waste stream; and
 - s. Provide information regarding your understanding of how each waste is utilized or treated at each treatment, storage, and/or disposal facility and provide the basis for your understanding.
3. Provide copies of any agreement and/or contract between you and each treatment, storage and/or disposal facility for the disposition (i.e., treatment or disposal) of your hazardous waste streams:
- a. Provide information regarding the quantities of the hazardous wastes that have been shipped to each treatment, storage and/or disposal facility in the past five years;
 - b. Please provide copies of all shipping documentation, i.e., manifests, bills of lading, or any other document enumerating quantity that have been used by PSC to accompany each shipment of hazardous waste for the last 3 years;

- c. Provide work orders associated with decommissioning and/or decontaminating services for the recent five-year period (from November 2013 through the present); and
 - d. Provide a list of companies that PSC has provided or is providing decommissioning and/or decontaminating services for the recent five-year period (from November 2013 through the present).
- 4. Provide the following information about any other company or contractor who generates hazardous waste at your Facility:
 - a. The other company's or contractor's legal name, address, telephone number, and current operator;
 - b. Provide a description of the other company's or contractor's industrial processes, and include your SIC or NAICS code; and
 - c. Provide the number of employees for the other company or contractor that worked at your Facility.
- 5. What is the relationship between PSC and HydroChemPSC?
- 6. Is PSC one and the same company as HydroChemPSC?
- 7. Does the RCRA identification number LAR000087098 belong to PSC or HydroChemPSC?

ENCLOSURE B

STATEMENT OF CERTIFICATION

PSC Industrial Outsourcing LP, –Gibson, LA

I certify that I am authorized to respond to this information request on behalf of PSC Industrial Outsourcing LP. I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2018.

(Signature)

(Name)

(Title)

BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
EPA REGION 6
1445 Ross Avenue
Dallas, Texas 75202-2733

IN RE

PSC Industrial Outsourcing LP

Gibson, Louisiana

RESPONDENT

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SUPOENA DUCES TECUM

TO: Mr. Donald Melancon
Manager
PSC Industrial Outsourcing LP
756 Geraldine Road
Gibson, LA 70356

YOU ARE HEREBY COMMANDED, pursuant to Section 11(c) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2610(c), to produce for inspection and/or copying those items identified and described on the ATTACHED PAGES which are possessed by you or under your control. YOU ARE FURTHER COMMANDED TO MAKE TRUTHFUL AND COMPLETE RESPONSES to all inquiries contained on the ATTACHED PAGES, and to produce both the documents and responses to the inquiries at the following time and place:

DATE AND TIME: December 4, 2018, 10 a.m.

PLACE: Office of Regional Counsel
U.S. Environmental Protection Agency
Region 6
13th Floor
1445 Ross Avenue
Dallas, Texas 75202-2733

You may claim any information that you submit in response to this subpoena to be confidential business information. EPA regulations governing confidentiality of business information are set forth in 40 Code of Federal Regulations ("C.F.R.") Part 2, Subpart B. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless

you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you.

If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret", "proprietary", or "company confidential". If you claim information submitted in response to this subpoena as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

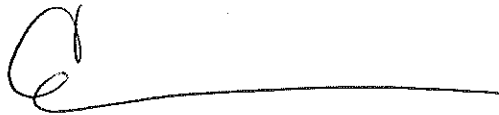
- A. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
- B. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.
- C. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?
- D. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
- E. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
- F. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
- G. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this subpoena if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

You are hereby advised that EPA is authorized to seek both civil penalties and criminal sanctions (for knowing and willful violations) of TSCA, pursuant to Section 16(a) and (b), 15 U.S.C. §§ 2615(a) and (b). All information disclosed pursuant to this subpoena shall be evaluated in accordance with said powers.

FAILURE TO COMPLY WITH THIS SUBPOENA MAY RESULT IN PROCEEDINGS AGAINST YOU IN A UNITED STATES DISTRICT COURT.

Issued at Dallas, Texas, this 14 day of November 2018.

A handwritten signature in black ink, appearing to be 'C. Seager', with a long horizontal line extending to the right.

Cheryl T. Seager
Director
Compliance Assurance and
Enforcement Division

Attorney Contact:

Ms. Marcia Moncrieffe
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202
(214) 665-7343

ATTACHMENT TO SUBPOENA

I. INSTRUCTIONS AND DEFINITIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in this Subpoena.
2. Precede each answer with the number of the question to which it corresponds.
3. If information or documents not known to you or not available to you as of the date of submission of a response to this Subpoena should later become known or available to you, you shall supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you shall notify EPA of this fact as soon as possible and provide EPA with a corrected response.
4. For each document produced in response to this subpoena, indicate on the document, or in some other reasonable manner, the number of the question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy).
5. The terms "document" and "documents" shall mean any object that records, stores, or presents information, both electronic and tangible, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra-office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any hard drive, flash drive, CD, DVD, or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such hard drive, flash drive, CD, DVD, or other type of memory and together with printouts of such hard drive, flash drive, CD, DVD, or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

6. The terms “identify” or “identification” means, when used in reference to a natural person, to provide his or her name, present or last known address, present or last known employment position or affiliation, and positions or affiliations during the time covered by this subpoena.
7. Unless otherwise stated, the definitions in 40 C.F.R. Part 761 apply.
8. The term “Facility” shall mean the Facility located at 756 Geraldine Road, Gibson, LA 70356.
9. The term “you” or “yours” refers to PSC.

II. INFORMATION AND DOCUMENTS REQUESTED

1. Identify each person answering these questions on behalf of PSC Industrial Outsourcing LP, (the “Facility”).
2. For each question contained herein, identify all persons consulted in preparation of the answer.
3. For each question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and correct copies of all documents.
4. Provide an accurate description of the Facility’s operations.
5. What processes/procedures does the Facility have in place to ensure compliance with 40 C.F.R. Part 761 (Polychlorinated Biphenyls (“PCBs”)) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions?
6. Provide a copy of any Standard Operating Procedures regarding PCBs.
7. Provide a copy of EPA Form 7710-53, Notification of PCB Waste Activity. See 40 C.F.R. § 761.205.
8. If the Facility has not submitted EPA’s Form 7710-53, please explain.
9. Please provide a copy of the Facility’s Annual Records required by 40 C.F.R. § 761.180(a) for the past five calendar years (2014, 2015, 2016, 2017, 2018). Please note as well that Annual Records include manifests, certification of disposal, records of inspections and cleanups performed in accordance with 40 C.F.R. § 761.65(c)(5).
10. If the Facility has posted a PCB M_L mark(s), identify and provide photos of the equipment or storage area(s) marked and explain why it is marked. See 40 C.F.R. § 761.40.

11. Provide a copy of all spill reports prepared in last five years pursuant to 40 C.F.R. § 761.125.
12. Provide a copy of all analytical results for the analysis of PCB concentration in samples taken regarding the Facility for last five years.
13. In all Facility's analytical results where PCBs have been identified over the last five years, please identify the source of the PCBs.
14. Has PSC performed a clean-up of PCBs at the Facility, within the past five years? If yes, please provide a complete explanation to address each clean-up for example, provide the sources, nature, quantity of waste, disposition, etc.
15. If yes to Question 14, please provide the name, address, date, and site location for cleanup identified in response to this question 15.
16. Has PSC engaged in decommissioning oil rigs? If Yes, please provide the following information:
 - A. The name of each rig and the year it was built;
 - B. The name of the company or entity that owned each rig and the size of each rig;
 - C. Was the oil in any oil-filled electrical equipment tested for PCBs? If your answer is yes, provide a copy of the analytical results, and explain how and where the oil and electrical equipment were disposed. If your answer is no, explain why the oil-filled electrical equipment was not tested for PCBs.
 - D. Was the paint tested for PCBs? If yes, provide a copy of the analytical results and explain how and where such paint was disposed. If the answer is no, explain why the paint was not tested for PCBs; and
 - E. Was the electrical cable(s) tested for PCBs? If yes, provide a copy of the analytical results and explain how and where such cable(s) were disposed. If your answer is no, explain why the cable(s) and their components were not tested for PCBs.
17. Has PSC engaged in the dismantling of oil rigs? If the answer is yes, please provide the following information:
 - A. The name of each rig and the year it was built;
 - B. The name of the company or entity that owned each rig and the size of each rig;
 - C. Was the oil in any oil-filled electrical equipment tested for PCBs? If your answer is yes, provide a copy of the analytical results, and explain how and where the oil and electrical equipment were disposed. If your answer is no, explain why the oil-filled electrical equipment was not tested for PCBs;

- D. Was the paint tested for PCBs? If yes, provide a copy of the analytical results and explain how and where such paint was disposed. If the answer is no, explain why the paint was not tested for PCBs; and
 - E. Was the electrical cable(s) tested for PCBs? If yes, provide a copy of the analytical results and explain how and where such cable(s) were disposed. If your answer is no, explain why the cable(s) and their components were not tested for PCBs.
18. Has the PSC engaged in the dismantling of ships? If the answer is yes, please provide the following information:
- A. The name of each ship and the year it was built;
 - B. The name of the company or entity that owned each ship and the size of each ship;
 - C. Was the oil in any oil-filled electrical equipment tested for PCBs? If your answer is yes, provide a copy of the analytical results, and explain how and where the oil and electrical equipment were disposed. If your answer is no, explain why the oil-filled electrical equipment was not tested for PCBs.
 - D. Was the paint tested for PCBs? If yes, provide a copy of the analytical results and explain how and where such paint was disposed. If the answer is no, explain why the paint was not tested for PCBs; and
 - E. Was the electrical cable(s) tested for PCBs? If yes, provide a copy of the analytical results and explain how and where such cable(s) were disposed. If your answer is no, explain why the cable(s) and their components were not tested for PCBs.
19. If the answer to questions 16, 17, and/or 18 above is yes, did you dispose of any fluorescent light ballasts? If yes, identify where and how the fluorescent light ballasts were disposed. In addition, answer yes or no to the following questions regarding each disposal:
- A. Were the fluorescent light ballasts labeled as "No PCB"?
 - B. Did the fluorescent light ballasts contain PCBs in potted material?
 - C. Did the fluorescent light ballasts contain a PCB capacitor?
 - D. If the answer is no to any of the questions in this question 19, subsection A through C, please provide a rationale and narrative addressing each sub-question.

OPTIONAL ANSWER TO SUBPOENA DUCES TECUM BY MAIL

TO RESPONDENT:

You have been served with an EPA administrative subpoena duces tecum issued pursuant to Section 11(c) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2610(c). That subpoena requires that an individual personally attend a meeting at the time and place listed in the subpoena and then and there produce the records and answers to the questions indicated in the subpoena.

EPA hereby offers to you the alternative of responding to the subject subpoena by mail rather than attending in person and producing the records and answers to the questions. You would be spared personal inconvenience by electing to respond to the subpoena by mail. However, you must follow carefully the following instructions if you elect to respond to the subpoena by mail:

You must telephone the following person promptly and state specifically that you thereby elect to respond to the subpoena by mail rather than in person. You must follow up on that call by sending a letter to the same effect. Ms. Marcia Moncrieffe can be reached at (214) 665-7343. Her mailing address is:

Ms. Marcia Moncrieffe
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

1. You must make photocopies of each document or record which is in your possession or otherwise available to you, which you believe comes within the description set forth in the attachment to the subpoena. You must take care to include all documents and records which the attachment reasonably describes because you could later be subpoenaed again.
2. You must then mail those records and documents and your answers to the questions or otherwise have them delivered together with an affidavit to the person named in paragraph 1 above at the address stated there. A model of the affidavit which must accompany the shipped records is attached to these instructions and must be signed and sworn to before a Notary Public. Please take care to read the affidavit carefully and be sure that you understand it before you sign and swear to it.
3. The affidavits and all the records and the answers to the questions must be in the hands of the person named in paragraph 1 above by the time specified in the subpoena. If it is necessary to request an extension of time, call the person named in paragraph 1 above to request an extension and, if granted, to obtain the replacement

return date. The request must also be followed by a written request sent to the person listed in paragraph 1 above to the address stated there.

BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
EPA REGION 6

AFFIDAVIT RESPONDING BY MAIL TO SUBPOENA DUCES TECUM

STATE OF _____

SS. _____

COUNTY OF _____

I, the undersigned affiant, first being duly sworn, upon oath, depose and say:

1. Attached hereto are ____ pages of photocopies of documents or records. The attached pages are true and correct copies of records which I presently have in my custody and/or control as an owner and/or employee of: _____ the address of which is _____
2. I am one of the custodians of the records of which the attached pages are true and correct copies. Those records have been subpoenaed by EPA and are being produced along with this affidavit in response to that subpoena.
3. The records, of which the attached pages are true copies, were and/or are received and/or kept in the usual course of the regularly conducted business and activity of the entity listed in paragraph 1 above. The records are relied upon by me and others for conducting every-day affairs.
4. I have made a diligent search and inquiry for all records which are reasonably described in the subpoena to which this affidavit responds. I have not found or located, and I have not been told about, and I have no knowledge of, any records coming within the descriptions set forth in the said subpoena which have not been copied and submitted along with this affidavit.
5. I acknowledge that this affidavit is submitted to the United States in connection with a matter within the jurisdiction of EPA and that any material false statement of fact herein may be a crime under 18 U.S.C. § 1001.

DATED: _____ SIGNED: _____

TYPED NAME: _____

OFFICE OR TITLE: _____

SWORN AND SUBSCRIBED TO before me, the undersigned Notary

Public on this _____ day of _____ 2018.

(SEAL)

NOTARY PUBLIC in and for the State of

_____ residing at _____

My commission expires: _____

CERTIFICATE OF SERVICE

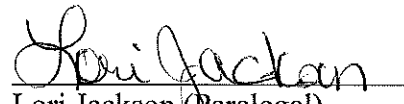
I hereby certify that on the 15th day of Nov 2018, the original of the foregoing Subpoena Duces Tecum, was sent by Certified Mail,

Return Receipt Requested # 70515200003399071169 to:

Mr. Donald Melancon
Manager
PSC Industrial Outsourcing LP
756 Geraldine Road
Gibson, LA 70356

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 15th day of Nov 2018.


Lori Jackson (Paralegal)