



REGION 6

DALLAS, TX 75270

March 23, 2026

TRANSMITTAL VIA EMAIL:

angelle.blanchard@valsourcenet

Angelle Blanchard
Production Manager
Valsource LLC
2701 N River Road
Port Allen, LA 70767

RE: Notice of Potential Violation and Opportunity to Confer

Dear Ms. Blanchard:

The United States Environmental Protection Agency, Region 6 ("EPA"), through its investigation and records review, made certain determinations about Valsource LLC ("Valsource") and its facility located at 2701 N River Road, Port Allen, Louisiana 70767. Information currently available to the EPA suggests that Valsource may be in violation of/have committed a violation(s) of the Resource Conservation and Recovery Act ("RCRA"), and the regulations promulgated thereunder. By this letter, EPA is extending to you an opportunity to advise the Agency, in person, via a conference call, or in writing, of any further information the EPA should consider with respect to the potential violation(s). Specifically, EPA has identified potential violations of the Resource Conservation and Recovery Act ("RCRA"), and the regulations promulgated thereunder. I therefore write to share with you: (1) the current areas of concern; (2) an option for resolution; and (3) a timeline for resolution.

Current Areas of Concern

As a generator of hazardous waste, Valsource is subject to Sections 3002 and 3010 of RCRA, 42 U.S.C. §§ 6922 and 6930, and the regulations set forth at 40 Code of Federal Regulations (C.F.R.) Parts 262 and/or 270. Upon further investigation, EPA may determine that Valsource is also subject to Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925, and the regulations promulgated thereunder.

Based on EPA's current investigation and records review, Valsource is identified as "active" and certified notification as a Very Small Quantity Generator (VSQG) on July 18, 2023. However, according to eManifest(s) listed in Attachment 1, at least once within the last five calendar years, Valsource generated and stored hazardous waste in quantities greater than 100 kilograms per month, which qualified the Valsource as a Small Quantity Generator as established under 40 Code of Federal Regulations (C.F.R.) Parts 262 and/or 270.

At a minimum, EPA identified the following potential violations:

- i. Failure to meet RCRA notification requirements, in violation of RCRA § 3010(a), 42 U.S.C. § 6930(a);
- ii. Failure to operate within its stated generator status for at least one (1) year, in violation of 40 C.F.R. Parts 262 and/or 270.

EPA is prepared to meet and discuss the potential violations, and other areas of concern, with Valsource, with the aim of resolving this matter through a timely settlement process.

An Option for Resolution

Upon receipt of this letter, if Valsource is interested in resolving the matter through settlement, Valsource has until 04/02/2026, to inform EPA by telephone or e-mail by contacting:

U.S. EPA, Region 6
Enforcement and Compliance Assurance Division (ECADSC)
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
ATTN: Michael "Patrick" Spillman
e-mail: spillman.michael@epa.gov
Phone: 214-665-3143

Thereafter, Michael "Patrick" Spillman will make arrangements to discuss this letter with Valsource facility representatives via a conference call. During this conference call, Valsource may address the potential violations and present evidence that contravenes EPA's evidence. The main goal of this option is to bring the facility into timely compliance with the applicable environmental laws and regulations.

To the extent that Valsource qualifies as a "small business" under the Small Business Regulatory Enforcement Fairness Act, enclosed is an Information for Small Businesses sheet that provides information on compliance assistance.

Timetable for Resolution

Given the nature of the potential violations listed above and the current evidence that EPA has in support of these violations, EPA estimates that the parties could have an agreed upon Expedited Settlement Agreement by 04/05/2026. This is contingent on whether Valsource avails itself of the settlement process now offered and works amicably with the EPA. It should be noted that if Valsource decides not to accept this streamlined option for settlement, Valsource should notify EPA of its decision in writing to Michael "Patrick" Spillman by 04/11/2025. Thereafter, EPA will exercise its other options for ensuring Valsource's timely compliance with RCRA and the regulations promulgated thereunder.

Please direct questions to Michael "Patrick" Spillman of the Waste Enforcement Branch at 214-665-3143 or via email at spillman.michael@epa.gov. Thank you for your attention to this matter.

Sincerely,

JEFFREY YURK

Digitally signed by JEFFREY
YURK
Date: 2026.03.23 14:23:22
-05'00'

Jeff Yurk

Manager

Waste and Chemical Enforcement Branch

Enclosures

U.S. EPA Small Business Resources Information

Attachment 1 - eManifests

ecc: craig.easly@la.gov