



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

AUG 16 2019

CERTIFIED MAIL-RETURN RECEIPT REQUESTED: 7009 2820 0001 8284 3440

Mr. Richard J. Holder
Nutrien LTD - PCS Nitrogen Fertilizer, L.P. - Geismar Facility
PO Box 307
Geismar, LA 70734-0307

Re: Clean Air Act Notice of Violation

Dear Mr. Holder:

The United States Environmental Protection Agency ("EPA") has identified PCS Nitrogen Fertilizer, L.P. ("PCS Nitrogen") as having violated the Clean Air Act ("CAA"), 42 U.S.C. § 7401 *et seq.*, and the regulations promulgated thereunder. This Notice of Violation ("Notice") is issued to PCS Nitrogen for violations of the CAA at its Geismar facility located at 10886 Highway 75, Geismar, Louisiana 70734 ("the Facility"). Specifically, EPA believes that PCS Nitrogen¹ has violated the Louisiana State Implementation Plan ("SIP"). The Notice is issued pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), which requires the Administrator of EPA to notify any person in violation of a SIP or permit of the violation(s). The authority to issue this Notice has been delegated to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6.

On March 27, 2019, we sent PCS Nitrogen a letter regarding our Emission Inventory Permit Consistency Review, in which we reviewed the Facility's emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals for calendar year 2016, as reported to the Louisiana Department of Environmental Quality ("LDEQ"). As noted in our letter, the Facility's reported annual emission totals exceeded its permit authorization limits. PCS Nitrogen responded by certified mail dated April 22, 2019 and provided information regarding the annual emission totals.

¹ Please be advised that some companies may qualify as a "small business" under the Small Business Regulatory Enforcement and Fairness Act (SBREFA). The U.S. Small Business Administration has established a Table of Small Business Size Standards, which can be found at: https://www.sba.gov/sites/default/files/Size_Standards_Table.pdf. The SBREFA Information Sheet provides information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at: <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockey=P100BYAV.PDF>.

CAA Violation

We are sending this letter to inform PCS Nitrogen of violations of Louisiana's federally approved SIP at the Facility.

LAC 33:III.919.B.1 of the Louisiana SIP, approved at 76 Fed. Reg. 38,977 (July 5, 2011), requires that PCS Nitrogen submit an Annual Emissions Statement to LDEQ consisting of an inventory of the Facility's actual emissions and the permitted emissions limits of volatile organic compounds (VOCs), nitrous oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), lead (Pb), particulate matter of 10 microns or less (PM₁₀) and 2.5 microns or less (PM_{2.5}), and ammonia. Actual emissions must be reported for all sources of emissions at the Facility, including fugitive emissions, flash gas emissions, insignificant sources, and excess emissions occurring during maintenance, start-ups, shutdowns, upsets, and downtime.

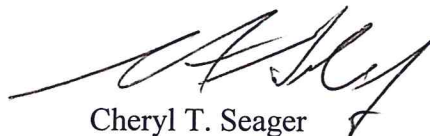
Based on its review, EPA finds that PCS Nitrogen violated LAC 33:III.919.B.1 of the Louisiana SIP by failing to report the Facility's actual emissions in the annual emissions inventory for the following pollutants for reporting year 2016:

- PM_{2.5}
- PM₁₀
- VOCs

Opportunity to Confer

We appreciate PCS Nitrogen working with us regarding this matter. Please contact Carlos R. Evans, Assistant Regional Counsel, Evans.Carlos@epa.gov, (214) 665-8184, within ten (10) business days of receipt of this Notice to discuss an administrative path for quick resolution.

Sincerely,



Cheryl T. Seager
Director, Enforcement and Compliance
Assurance Division

cc: Celena Cage, LDEQ (Celena.Cage@la.gov)