



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

October 21, 2021

VIA EMAIL: Shawn.Ward@cornerstonchemco.com

Mr. Shawn Ward
Cornerstone Chemical Co. – Energy Park
10800 River Road
Waggaman, LA 70094

RE: Emission Inventory Permit Consistency Review
Cornerstone Chemical Co. – Energy Park (AI# 1357)

Dear Mr. Ward:

The U.S. Environmental Protection Agency (EPA) Region 6 is working with the Louisiana Department of Environmental Quality (LDEQ) and has reviewed your facility's 2019 emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals, as reported to LDEQ. Based upon this review, EPA has determined that your reported emissions for some Emission Points exceeded your permit authorization limits. EPA had also reviewed your Title V reports for 2019 and did not find that these permit exceedances were reported.

A detail by Emission Point of the differences between the reported emissions and permitted limits is included in the attachment to this letter. EPA is providing you the opportunity to clarify or explain these differences, especially if any of the following conditions are present:

- Sources and associated emissions included in the emission inventories that are not represented in permits (e.g. de minimis sources);
- Criteria pollutants or individual HAPs reported in the facility's emission inventories that are not represented in LDEQ permits or authorizations;
- Reported or unreported upset or other excess emission events (e.g. startup/shutdown).

If Cornerstone Chemical Co. (Cornerstone) is interested in discussing or providing information about this matter, you have ten (10) business days from receipt of this letter to inform EPA by e-mail by contacting:

Colleen McCarthy
Enforcement Officer (ECDAT)
Air Toxics Enforcement Section
U.S. EPA, Region 6
email: mccarthy.colleen01@epa.gov

Subsequent to the above-referenced due date, Colleen McCarthy will arrange to meet with Cornerstone via conference call. At that time, Cornerstone may provide additional information to address the potential violations and present evidence that contravenes EPA's evidence. The primary goal is to ensure compliance with the applicable environmental laws and regulations; however, settlements will be available where appropriate.

Please direct questions to Colleen McCarthy of the Air Enforcement Branch at 214-665-7334 or at mccarthy.colleen01@epa.gov. Thank you for your attention to this matter.

The EPA acknowledges that the COVID-19 pandemic may impact your business. If that is the case, please contact us regarding any specific issues you need to discuss.

Sincerely,

STEVEN
THOMPSON

Digitally signed by STEVEN THOMPSON
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=STEVEN THOMPSON,
0.9.2342.1.9200300.100.1.1=68001003652657
Date: 2021.10.21 12:43:41 -0500

Steve Thompson
Chief
Air Enforcement Branch

Attachment

ECC: Angela Marse, Louisiana Department of Environmental Quality, angela.marse@la.gov
Brett Matherne, Cornerstone Chemical Co., brett.matherne@cornerstonchemco.com