



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

February 23, 2022

VIA EMAIL: Shawn.Ward@cornerstonchemco.com

Shawn Ward
Director, Corporate HSSE and Sustainability
Cornerstone Chemical Co. – Energy Park
10800 River Road
Waggaman, LA 70094

Re: Clean Air Act Notice of Violation

Dear Mr. Ward:

The United States Environmental Protection Agency (“EPA”) has identified Cornerstone Chemical Company (“Cornerstone”) 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 Cornerstone for violations of the CAA at its Energy Park facility located at 10800 River Road, Waggaman, Louisiana (“the Facility”). Specifically, EPA believes that Cornerstone¹ 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 October 22, 2021 we sent Cornerstone 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 2019, 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. Cornerstone responded via email dated November 8, 2021 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: <http://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockkey=P100BYAV.PDF>.

CAA Violation

We are sending this letter to inform Cornerstone 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 Cornerstone 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 Cornerstone 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 ammonia for reporting year 2019.

Permit	Subject Item Type	Parameter	Permitted Limit (tpy)	ERIC Reported Emissions (tpy)	Reported Emissions Over Permitted Limit (tpy)
1981-V6	Melamine Flare (FS-1)	Ammonia	4.94	9.56	4.62
1981-V6	Melamine Central Flare (VH-3)	Ammonia	22.65	42.39	19.74

Opportunity to Confer

We appreciate Cornerstone working with us regarding this matter. Please contact Carlos Zequeira, Assistant Regional Counsel, at Zequeira.C@epa.gov or (214) 665-8053, 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

ec: Celena Cage, LDEQ (Celena.Cage@la.gov)
Jamie Williams, Cornerstone Chemical Co. (Jamie.Williams@cornerstonechemco.com)