



REGION 6

DALLAS, TX 75270

February 25, 2026

TRANSMITTAL VIA EMAIL:

jasonr@redguard.com

Jason Ruckle
RedGuard, LLC
444 West 47th Street South
Wichita, KS 67217

RE: Notice of Potential Violation and Opportunity to Confer

Dear Mr. Ruckle,

The United States Environmental Protection Agency, Region 6 ("EPA"), through its investigation and records review, made certain determinations about RedGuard, LLC (RG) and its facility located at 4817 South Lewis Street, New Iberia, Louisiana 70560. Information currently available to the EPA suggests that RG 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, the 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, RG 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 RG 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, RG is identified as "active" and certified notification of their Small Quantity Generator (SQG) status on October 20, 2025. However, according to eManifest(s) listed in Attachment 1, at least once within the last five calendar years, RG generated and stored hazardous waste in quantities greater than 100 kilograms per month, which qualified the RG 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 RG, with the aim of resolving this matter through a timely settlement process.

An Option for Resolution

Upon receipt of this letter, if RG is interested in resolving the matter through settlement, RG has until 03/02/2026, 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 RG facility representatives via a conference call. During this conference call, RG 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 RG 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 03/05/2026. This is contingent on whether RG avails itself of the settlement process now offered and works amicably with the EPA. It should be noted that if RG decides not to accept this streamlined option for settlement, RG should notify EPA of its decision in writing to Michael "Patrick" Spillman by 03/11/2025. Thereafter, EPA will exercise its other options for ensuring RG'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: 2026.02.25
12:52:03 -06'00'

Jeff Yurk
Manager
Waste and Chemical Enforcement Branch

Enclosures
U.S. EPA Small Business Resources Information

Attachment 1 - eManifests

ecc: craig.easly@la.gov