



August 12, 2024

U.S EPA, Region 6  
Enforcement and Compliance Assurance Division (ECAD)  
1201 Elm Street, Suite 500  
Dallas, Texas 75270-2102  
ATTN: Adolphus Talton

**Re: Certification Statement  
In the Matter of Indorama Ventures Olefins, LLC  
Docket No. RCRA-06-2024-0954**

Dear Mr. Talton,

In accordance with the Consent Agreement and Final Order in the Matter of Indorama Ventures Olefins, LLC (USEPA Docket No. RCRA-06-2024-0954), effective May 14, 2024, enclosed is the Compliance Certification as required by Section V, Provisions #51 and #52.

Attachment 1 provides a listing of the requirements of Provision 51, followed by the Indorama's response. Attachment 2 is the signed Certification as required by Provision 52. Attachment 3 provides the requested training records.

If you have any questions, or need additional information, please contact me or Todd McLane at [Todd.A.Mclane@Us.Indorama.net](mailto:Todd.A.Mclane@Us.Indorama.net).

Sincerely,

A handwritten signature in black ink that reads "David Hext".

David Hext  
Site Manager  
Indorama Ventures Olefins, LLC  
[David.Hext@Us.Indorama.net](mailto:David.Hext@Us.Indorama.net)

Cc: Lorena S. Vaughn, [Vaughn.lorena@epa.gov](mailto:Vaughn.lorena@epa.gov)  
Adolphus Talton, [Talton.adolphus@epa.gov](mailto:Talton.adolphus@epa.gov)



Attachment 1  
Provision 51

51. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), Respondent is hereby ordered to take the following actions, and within 90 calendar days of the effective date of this CAFO,

*Respondent shall provide in writing the following:*

- A. Respondent shall certify that it has assessed all its solid waste streams at the Indorama Facility to determine the accurate waste codes and has developed and implemented processes to ensure that Respondent is operating the Indorama Facility in compliance with RCRA and the regulations promulgated thereunder, including, but not limited to, processes, best practices, and training concerning:

(a) making hazardous waste determinations;

**Indorama has evaluated existing waste active waste codes and associated waste profiles and has determined they are compliant with the RCRA regulations. In addition, Indorama has reviewed and updated the existing waste determination procedure.**

(b) handling hazardous wastes;

**Indorama has reviewed and updated procedures associated with waste container labeling and inspections. These procedures have been reviewed with Indorama personnel and contract personnel that handle wastes.**

(c) reporting, transporting, and disposing of hazardous waste.

**The facility has completed required reporting of hazardous waste generation. Indorama has reviewed and updated existing profiles as needed and has determined they are compliant with RCRA regulations. Waste is hauled to disposal facilities using licensed hazardous waste transporters.**

(d) preparing its manifests; and

**Indorama evaluated and updated their existing manifest procedures. Manifests are prepared and signed by associates with current certifications required by the Department of Transportation (DOT) and current RCRA training.**



(e) meeting the requirements of the land disposal requirements.

**Indorama has reviewed existing waste profiles to ensure they are compliant with the Land Disposal requirements under RCRA. The manifesting procedure was also updated to ensure Land Disposal requirements are listed.**

B. Respondent shall certify that it has accurately and adequately complied with its RCRA Section 3010 notification for the Indorama Facility and within the prescribed time period in Section 3010; and

**As a result of a historical records review, the current environmental management team has confirmed that the plant possessed RCRA hazardous waste ID number LAD981052376. A review of available records indicate that updates and annual reporting have been made as required by RCRA Section 3010.**

C. Respondent shall provide, with its certification, a description of Respondent's processes, best practices, and training as described in subparagraph A above.

**Indorama has updated the following site procedures. Copies of these procedures can be provided upon request.**

1. **HSSE- ENV-2-059 - Waste Characterization**
2. **HSSE- ENV-2-0401 - Waste Accumulation and Storage Areas**
3. **HSSE- ENV-2-0029 – Container Labeling and Marking**
4. **HSSE- ENV-2-0044 - Manifesting Hazardous Waste**

**Included as Attachment 3 is a copy of the existing training and certifications of personnel handling hazardous waste.**



## Attachment 2

### Provision 52 Certification Statement

"I certify under the penalty of law that this document and all its attachments were prepared by me or under my direct supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

A handwritten signature in black ink that reads "David Hext". The signature is written over a horizontal line.

David Hext  
Site Director



### Attachment 3

### Summary Training Records

Person	Company	Title	Date	Course
Jacob Seale	IVOL	Env. Specialist	11/14/2023	DOT
Jacob Seale	IVOL	Env. Specialist	11/16/2023	RCRA
Travis Latiolais	Clean Harbors	Site Lead	04/18/2024	RCRA
Travis Latiolais	Clean Harbors	Site Lead	09/29/2023	DOT
Josh Wilson	Clean Harbors	Equipment Op.	05/18/2024	RCRA
Josh Wilson	Clean Harbors	Equipment Op.	01/11/2024	DOT
Jasmin Silveira	Clean Harbors	Insite Rep	09/19/2023	DOT
Jasmin Silveira	Clean Harbors	Insite Rep	09/06/2023	RCRA