



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

August 10, 2012

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7010 2780 0002 4356 4511

Mr. Tom Germany, Plant Manager  
Calumet Shreveport Lubricant and Waxes, L.L.C.  
3333 Midway Avenue  
Shreveport, Louisiana 71109

Dear Mr. Germany:

Enclosed is an Information Request (Request) issued to Calumet Shreveport Lubricant and Waxes, L.L.C. (Calumet) under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information necessary to determine Calumet's compliance with Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and the Chemical Accident Prevention Provisions promulgated at 40 C.F.R. Part 68 at its Shreveport, Louisiana facility. Please provide the information requested within thirty (30) days of your receipt of this letter to the person identified in Enclosure A.

If you have any questions or need to request an extension, please contact Evan Pearson, Senior Enforcement Counsel, at (214) 665-8074.

Sincerely

A handwritten signature in black ink, appearing to read "John Blevins".

John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosures

cc: Celena Cage  
Louisiana Department of Environmental Quality

## ENCLOSURE A

### **CALUMET SHREVEPORT LUBRICANT AND WAXES, L.L.C. INFORMATION REQUEST**

The Environmental Protection Agency (EPA) is investigating Calumet Shreveport Lubricant and Waxes, L.L.C.'s (Calumet) compliance with Section 112(r) of the Clean Air Act (CAA), 42 U.S.C. § 7412(r), and the Chemical Accident Prevention Provisions promulgated at 40 C.F.R. Part 68 at its Shreveport, Louisiana facility. Pursuant to Section 114 of the CAA, 42 U.S.C. § 7414, you are hereby required to follow the instructions and provide responses to the questions in this Information Request (Request). You are required to submit this information to EPA within thirty (30) calendar days of receipt of this Request. If you anticipate that you will be unable to fully respond to this Request within thirty (30) calendar days, you must submit a sworn affidavit or declaration by a responsible corporate official within twenty (20) calendar days of receipt of this Request specifying what information will be provided within the time specified, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which responsive information must be provided to it. Furthermore, EPA specifically retains the right to obtain additional information beyond what is listed in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Calumet. An affidavit making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001 and 42 U.S.C. § 7413(c). Failure to fully comply with this Request may subject Calumet to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

In accordance with Section 114(c) of the CAA, 42 U.S.C. § 7414(c), the records, reports, and/or information requested in this Request must be submitted whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality for all or part of the information submitted (with the exception of emissions data) in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential material will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

Two copies of all information responsive to this Request should be sent to the following:

Samuel Tates, Chief  
Surveillance Section (6EN-AS)  
Air Enforcement Branch  
Compliance Assurance and Enforcement Division  
U.S. EPA - Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

### I. INSTRUCTIONS

1. The enclosed Affidavit (Enclosure B) must be filled out and submitted along with your responses to this Request.
2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.
3. Provide a separate response to each question or subquestion in this Request, and proceed each answer with the number of the question to which it responds.
4. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in a logically sequenced, bound format.
5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret", "proprietary", or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the following questions:
  - a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
  - b. For what period of time do you request that the information be maintained as confidential, *e.g.*, until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate

the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.

- c. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
- d. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
- e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
- f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
- g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish comments to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. *See* 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

## **II. DEFINITIONS**

The following definitions shall apply to the following words as they appear in Enclosure A:

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, both electronic and tangible, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other

- conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any hard drive, flash drive, CD, DVD, or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such hard drive, flash drive, CD, DVD, or other type of memory and together with printouts of such hard drive, flash drive, CD, DVD, or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
2. The term "Calumet Shreveport Lubricant and Waxes, L.L.C." (Calumet) includes any officer, director, agent, or employee of Calumet, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof, and any related partnerships or limited partnerships.
  3. The term "you" or "yours" refers to Calumet.
  4. The term "facility" refers to Calumet's facility located 3333 Midway Avenue, Shreveport, Louisiana.
  5. The terms "identify" or "identification" means when used in reference to a natural person, to provide his or her name, present or last known address, his or her present or last known employment position or affiliation, and his or her positions during the time period covered by this Request.
  6. All terms used in the Request will have their ordinary meaning unless such terms are defined in the Clean Air Act, 42 U.S.C. § 7401 *et seq.* or the Chemical Accident Prevention Provisions, 40 C.F.R. Part 68, in which case such statutory or regulatory definitions apply.
  7. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Request, any information which might otherwise be construed to be outside its scope.
  8. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
  9. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

### III. QUESTIONS

1. Identify each person(s) answering each Question or subpart of each Question.
2. For each and every Question or subpart of each Question contained herein, identify all persons consulted in the preparation of the answer.
3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question, and provide true and accurate copies of such documents.
4. For each piece of equipment (corrosion monitored equipment) identified below, provide the following information:
  - A. Why the inspection was not conducted within the deadline set by Calumet;
  - B. Identify the standard (e.g., API, ASME, etc.) you used to determine the interval(s) between inspections (cite to the specific section of the standard which sets forth the relevant inspection interval);
  - C. If the equipment was offline, provide your definition of offline, and identify the date that it was placed in this status.
  - D. If the equipment was shutdown, provide your definition of shutdown, and identify the date that it was placed in this status.

RMP Processes	Unit	Equipment ID	Last Inspection	Inspection Due
Crude/Vac/Depropanizer	4 CRU	105804	12/28/2005	12/28/2010
	4 CRU	161102	07/16/1998	07/16/2003
	4 CRU	165406	07/28/2005	07/28/2010
	4 VAC	123201	08/23/2005	08/23/2010
	4 VAC	123202	10/12/2004	10/12/2009
	4 VAC	163202	11/23/2004	11/23/2009
MEK	DEPROP	168104	06/22/2006	06/22/2011
	MEK	127171	04/20/2004	08/27/2010
	MEK	127227	08/17/2006	08/17/2011
Naphtha Unifiner/Dehex	MEK	127228	08/17/2006	08/17/2011
	DHT	129201	07/14/2006	07/14/2011
	DHT	129202	07/14/2006	07/14/2011
	DHT	129203	07/14/2006	07/14/2011
	DHT	129204	07/14/2006	07/14/2011
	DHT	129205	07/14/2006	07/14/2011
	DHT	129206	07/14/2006	07/14/2011
	DHT	129211	07/14/2006	07/14/2011
	DHT	169201	07/14/2006	07/14/2011
	DHT	169202	07/14/2006	07/14/2011
	DHT	169203	07/14/2006	07/14/2011
	DHT	169204	07/14/2006	07/14/2011
	DHT	169205	07/14/2006	07/14/2011
	DHT	169206	07/14/2006	07/14/2011
DHT	169207	07/14/2006	07/14/2011	
	AMINE	107703	04/17/2008	04/26/2011

Penex	CDW	125206	01/30/2006	01/30/2011
	CDW	126415	03/17/2008	06/28/2011
	CDW	166417	09/28/2006	02/11/2011
Platformers	1 Plat	301804	07/07/2006	07/07/2011
	2 Plat	121916	09/07/2004	05/20/2011
	2 Plat	301904	07/05/2006	07/05/2011
Propane Deasphalting	PDA	123906	02/23/2004	08/03/2011
Sour Crude Unit	SOUR CRU	128116	08/16/2006	08/16/2011
	SOUR CRU	128125	08/16/2006	08/17/2011
	SOUR CRU	168121	08/16/2006	08/16/2011

5. For each operating procedure identified below, explain why it was not timely certified, as required by 40 C.F.R. § 68.69(c), state the date it was actually certified, and provide a copy of the certification.

	Procedure	Document Number	Missing Certifications	Last Certified
	<b>PDA Unit</b>			
1	Emergency Shut Including a Fire/Vapor Release	39-E-0001	2011	7/2/2010
2	Loss of Electrical Power	39-E-0002	2011	7/7/2010
3	Loss of Instrument Air	39-E-0003	2011	7/7/2010
4	Loss of Fuel Gas	39-E-0004	2011	7/7/2010
5	Loss of Cooling Water	39-E-0005	2011	7/7/2010
6	Loss of Steam	39-E-0007	2011	2/25/2010
7	PDA Console Operator Demo Skills	39-G-1000	2011	2/23/2010
8	PDA Outside Operator Demo Skills	39-G-2000	2011	2/23/2010
9	Propane Deasphalting Unit Normal Operations	39-n-0005	2011	7/7/2010
10	Flare Release Checklist	39-N-0010	2011	7/7/2010
11	Flushing With Diesel	39-P-0001	2010, 2011	9/16/2009
12	Hot Oil Flushing	39-P-0002	2011	7/7/2010
13	PDA Quality Adjustments	39-q-0002	2011	7/7/2010
14	PDA Outside Operators Duties	39-Q-0004	2011	7/7/2010
15	Deasphalting Tower Turnaround	39-s-0003	2011	7/7/2010
16	PDA Shutdown for Turnaround Checklist	39-s-0007	2011	7/7/2010
17	Loss of DAO Storage Pumps	39-T-0006	2011	7/7/2010
18	Propane Circulation	39-t-0017	2011	7/7/2010
19	Draining Flare Blowdown Drum	39-t-0020	2011	7/7/2010
20	Loss of Asphalt Pressure	39-T-0022	2011	7/7/2010
21	Bypass Old Low Temperature Evaporator	39-t-0025	2011	7/7/2010
22	Hot Diesel Flush of Asphalt/Propane Container	39-T-0026	2011	2/23/2010
23	Asphalt Recovery System	39-u-0003	2011	7/7/2010
24	PDA Startup Checklist	39-U-0006	2011	7/7/2010
25	Normal Startup Checklist	39-U-0009	2011	7/7/2010
26	PDA Unit Manual	39-untml	2011	7/7/2010
27	PDA Unit Overview	39-V-0001	2011	2/3/2010

6. On August 18, 2011, Calumet sent a letter to EPA stating that "Calumet Shreveport Lubricants and Waxes, LLC was partially compliant on certification of procedures during 2006, 2007, and 2008. Identify which procedures were not timely certified for 2006, 2007, and 2008, and provide documentation showing when the procedures were certified.

7. Provide the following information about the hydrogen sulfide (H<sub>2</sub>S) and sulfur dioxide (SO<sub>2</sub>) monitors at the Platformers and Pressure Swing Absorber (PSA) Units:
  - A. Identify the date that the H<sub>2</sub>S monitors were removed from the Platform Units. Explain why these monitors were removed, and what, if anything, replaced these monitors. Was a management of change (MOC) performed prior to removing the monitors? If your answer is yes, provide a copy of the MOC. If your answer is no, explain why an MOC was not performed.
  - B. Identify the date that the SO<sub>2</sub> monitors were removed from the Platformer Units. Explain why these monitors were removed, and what, if anything, replaced these monitors. Was a management of change (MOC) performed prior to removing the monitors? If your answer is yes, provide a copy of the MOC. If your answer is no, explain why an MOC was not performed.
  - C. Identify the date that the H<sub>2</sub>S monitors were removed from the PSA Unit. Explain why these monitors were removed, and what, if anything, replaced these monitors. Was a management of change (MOC) performed prior to removing the monitors? If your answer is yes, provide a copy of the MOC. If your answer is no, explain why an MOC was not performed.
  - D. Identify the date that the SO<sub>2</sub> monitors were removed from the PSA Unit. Explain why these monitors were removed, and what, if anything, replaced these monitors. Was a management of change (MOC) performed prior to removing the monitors? If your answer is yes, provide a copy of the MOC. If your answer is no, explain why an MOC was not performed.
8. Explain why the removal of the H<sub>2</sub>S and SO<sub>2</sub> monitors were not addressed in the December 2009 Process Hazard Analysis (PHA) revalidation for the Platformers and PSA Units.
9. For each of the persons identified below, specify the dates that the person was a member of the fire brigade.
  - A. Lee Stephens;
  - B. Carlos Netter;
  - C. Kenny W. Zylicz;
  - D. L.C. Lister;
  - E. Louis Mayfield; and
  - F. Casey Hamiter
10. Identify all training (by name and course number) that you contend meets the requirement for the annual HAZWOPER 8 hour refresher training.

11. 40 C.F.R. § 68.67(c)(2) 81(d) provides that the process hazard analysis shall address any previous incident which had a likely potential for catastrophic consequences. For each incident identified below, explain why it was not addressed in the December 2009 PHA revalidation for the Platformers and Pressure Swing Absorber (PSA) Units.

ID	Date	Unit	Title
845	5/17/2007	#2 Platformer	Fire #2 Stabilizer Reboiler
848	6/20/2007	#1 Platformer	Flange Fire top of #1 Plat #1 heater
849	6/25/2007	#1 Platformer	Flange Fire on the #1 Platformer #1 Heat
862	1/15/2008	#1 Platformer	#1 Plat #1 heater flange fire
1005	7/2/2009	#1 Platformer	Flange Fire on #1 Heater outlet #1 Plat
1095	12/7/2009	#1 Platformer	#1 Plat Shutdown Fire

12. 40 C.F.R. § 68.81(d) provides that the incident report include, among other things, a description of the incident, the factors that contributed to the incident, and any recommendations resulting from the investigation. 40 C.F.R. § 68.81(e) provides that the owner or operator shall establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented.

For each incident identified below, identify the following:

- A. The factors that contributed to the incident;
- B. Whether incident resulted in a major uncontrolled emission, fire, or explosion, or could have resulted in a major uncontrolled emission, fire, or explosion. Provide a detail explanation of your conclusion. Include in your explanation the extent and value of any property damage and whether any injuries occurred.
- C. Whether a "regulated substance" (listed in 40 C.F.R. § 68.130) was, or could have been involved the incident;
- D. the actual effect or potential effect of the incident to public health or the environment;
- E. Whether an off-site agencies or entities were notified of the incident;
- F. The cause of the incident.
- G. Whether a root-cause analysis conducted? If yes, provide a copy of the analysis.
- H. The recommendations resulting from the investigation;
- I. The corrective action that was taken to prevent a reoccurrence of the incident.

J. Provide a copy of any other information relating to the incident, other than the Incident Report indicated below.

ID	Date	Unit	Title
845	5/17/2007	#2 Platformer	Fire #2 Stabilizer Reboiler
848	6/20/2007	#1 Platformer	Flange Fire on top of #1 Plat #1 heater
849	6/25/2007	#1 Platformer	Flange Fire on the #1 Platformer #1 Heat
862	1/15/2008	#1 Platformer	#1 Plat #1 heater flange fire
908	2/24/2008	#4 Vacuum	Fire #4 Vac 700 Pumpdown Discharge Pipe Failure
939	9/4/2008	#4 Vacuum Unit	Employee burned while pulling a pressure gauge
945	12/9/2008	#4 Crude	Fire on Ex-26 A/B PFB vs diesel P/A Exchanger
951	2/24/2008	#4 Crude	Fire #4 Vac 700 Pumpdown Discharge Pipe
975	2/13/2009	Diesel Hydrotreater	Fire in DHT on exchanger
1005	7/2/2009	#1 Platformer	Flange Fire on #1 Heater outlet #1 Plat
1100	12/23/2009	SRU	#2 SRU Sulfur Fire
1131	3/21/2010	LOHT	Flash Fire at VAC Heater
1154	4/19/2010	MEK	Oil Fire Base of Crystallizer
1155	4/25/2010	MEK	Soft Wax Stripper Tower Float Fire
1175	5/15/2010	MEK	#1 Vacuum Fire
1207	7/5/2010	LOHT	Pump Seal Fire in LOHT
1213	7/20/2010	CDW	Fire in CDW
1217	7/25/2010	SRU	Fire on #2 SRU Tailgas Line

13. Provide your definition of the following:
- Major uncontrolled emission;
  - Major uncontrolled fire; and
  - Major uncontrolled explosion.
14. Was a management of change (MOC) performed prior to making the decision to send heavy hydrocarbons to the fuel system, as referenced on page 5 of May 22, 2012 Root Cause Analysis Report? If your answer is yes, provide a copy of the MOC. If your answer is no, explain why an MOC was not performed.
15. Provide a copy of the three startup procedures for boiler startup, as referenced on page 12 of the May 22, 2012 Root Cause Analysis Report. How does Calumet determine which of the three startup procedures to use? Identify which procedure was used for the February 23, 2012 startup of the #5 Boiler, and explain why this procedure was chosen.

16. Explain why the fuel gas pressure regulator on the #5 Boiler was removed, as referenced on page 12 of the May 22, 2012 Root Cause Analysis Report. Was a management of change (MOC) performed prior to making this decision? If your answer is yes, provide a copy of the MOC. If your answer is no, explain why an MOC was not performed.
17. Explain what change(s) was made to the fire sequence control system, as referenced on page 12 of the May 22, 2012 Root Cause Analysis Report. Submit a copy of the pre-startup safety review for the #5 Boiler.
18. Explain the differences between the air regulator and solenoid that was installed versus the air regulator and solenoid that was replaced, as referenced on page 12 of the May 22, 2012 Root Cause Analysis Report.
19. Has Calumet completed its evaluation of the fuel gas system to determine if the system is adequate to knockout all liquids and eliminate condensing fluids downstream, as recommended on page 11 of the May 22, 2012 Root Cause Analysis Report. If your answer is yes, submit a copy of the evaluation. If your answer is no, when do you expect to complete this evaluation.
20. Has Calumet completed its evaluation of its practice of venting hydrocarbons to the fuel gas system, as recommended on page 11 of the May 22, 2012 Root Cause Analysis Report? If your answer is yes, submit a copy of the evaluation. If your answer is no, when do you expect to complete this evaluation.
21. Provide a copy of the data showing "that operations was having to drain the drum every hour the night before the over pressurization", as stated on page 11 of the May 22, 2012 Root Cause Analysis Report?
22. Provide a status report on the progress of implementing the recommendations listed on pages 11 – 12 of the May 22, 2012 Root Cause Analysis Report.
23. Submit a copy of your Title V permit, and all Title V deviation reports and Title V compliance certifications from January 1, 2008 to the present.

**ENCLOSURE B**

**AFFIDAVIT TO INFORMATION REQUEST**

BEFORE THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
DALLAS, TEXAS

STATE OF

SS.

COUNTY OF

I, the undersigned affiant, first being duly sworn, upon oath, depose and say:

1. I certify under penalty of law that the answers to the Questions in the Request, and all attachments included in our response were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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.

2. Attached hereto are \_\_\_\_\_ pages of photocopies of documents or records.

The attached pages are true and correct copies of records which I presently have in my custody and/or control as an owner and/or employee of \_\_\_\_\_  
the address of which is \_\_\_\_\_

3. I am one of the custodians of the records of which the attached pages are true and correct copies. Those records have been requested by EPA and are being produced along with this affidavit in response to that Request.

4. The records, of which the attached pages are true copies, were and/or are received and/or kept in the usual course of the regularly conducted business and activity of the entity

listed in paragraph 2 above. The records are relied upon by me and others for the purpose of conducting every-day affairs.

5. I have made a diligent search and inquiry for all records which are reasonably described in the Request to which this affidavit responds. I have not found or located, and I have not been told about, and I have no knowledge of, any records coming within the descriptions set forth in the said Request which have not been copied and submitted along with this affidavit.

6. I acknowledge that this affidavit is submitted to the United States in connection with a matter within the jurisdiction of EPA, and that any material false statement or act herein may be a crime under 18 U.S.C. § 1001, 42 U.S.C. § 6928(d), and 42 U.S.C. § 7413(c).

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

PRINTED NAME: \_\_\_\_\_

OFFICE OR TITLE: \_\_\_\_\_

SWORN AND SUBSCRIBED TO before me, the undersigned Notary Public on this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

NOTARY PUBLIC in and for the State of

\_\_\_\_\_ residing at \_\_\_\_\_

SEAL

My commission expires \_\_\_\_\_.