



September 23, 2026

Courtney J. Burdette
Louisiana Department of Environmental Quality
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Re: Concerns Regarding the Effectiveness and Timeliness of LDEQ's Clean Air Act Compliance and Enforcement in the Lake Charles Region

Dear Secretary Burdette:

The Environmental Integrity Project (EIP) reviewed LDEQ's Clean Air Act administrative compliance and enforcement records for 23 industrial facilities in the Lake Charles region.¹ Our review examined longstanding concerns regarding enforcement timeliness identified by the Louisiana Legislative Auditor in 2021 and evaluated the effectiveness of LDEQ's recent enforcement response in the Lake Charles region.

Overview of Findings

We identified several serious concerns about LDEQ's compliance and enforcement program, including: unreasonable delays in identifying violations and taking enforcement action, formal enforcement actions that do not require specific corrective measures, and heavy reliance on self-reported violations and warning letters. These problems can allow violations to continue, weaken incentives for facilities to invest in compliance, and reduce the effectiveness of enforcement in preventing future violations.

We reviewed 28 formal enforcement actions and 50 informal actions that LDEQ issued to 20 petrochemical facilities in the Lake Charles region between January 2021 and August 2026, as well as related compliance and enforcement records.² Of these 28 formal actions, LDEQ collected penalties in ten of the actions.³ Penalties for the remaining 18 actions had not yet been determined at the time of our review. We found that:

- 1) **LDEQ often identified and addressed violations years after they occurred.** These delays limit the ability of facilities to make timely improvements to address the violations and prevent them from recurring.

¹ EIP reviewed compliance and enforcement records for 23 petrochemical facilities in Lake Charles region of Louisiana between January 2021 and August 2026. During that period, LDEQ issued 22 Consolidated Compliance Orders and Notices of Potential Penalty, 6 Notices of Potential Penalty, 45 Warning Letters, and 5 Notices of Violation to 20 of these facilities. See Attachment A.

² Formal administrative enforcement actions, such as compliance orders and notices of potential penalty, provide LDEQ with the authority to impose enforceable corrective requirements and seek civil penalties. Sometimes LDEQ issues only a notice of potential penalty which signals there will be no corrective action. Informal enforcement actions, such as warning letters and notices of violation, generally notify facilities of alleged violations and request corrective action. They do not impose enforceable obligations or penalties.

³ For these ten penalty actions, the average penalty was \$66,300, the largest penalty was \$250,000 and the smallest was \$1,000.

LDEQ was aware of many of the violations at these facilities through self-reported Clean Air Act Title V reports but failed to act in a timely manner. Moreover, LDEQ relied heavily on these self-reported violations to “assess” the extent of noncompliance, many of which were reported years after they occurred.

In nearly four out of five of the 28 formal enforcement actions, the earliest cited violation occurred more than three years before formal enforcement. In more than three out of five, the earliest cited violation occurred more than five years earlier.⁴ For the 45 warning letters we reviewed, the average time from the incident or inspection date to issuance of the warning letter was 1.7 years. In one case, the delay was ten years.

- 2) **Delays can jeopardize LDEQ’s ability to obtain civil penalties.** In some cases, information concerning potential violations had been available to LDEQ for years before formal enforcement, raising concerns about whether the Department acted promptly enough to preserve its ability to obtain appropriate penalties.
- 3) **LDEQ’s formal enforcement actions did not require specific measures to correct the underlying causes of violations.** None of the 28 formal enforcement actions we reviewed required facilities to make specific changes to equipment or operations, improve monitoring, develop corrective-action plans, or investigate the root causes of violations. Instead, most required facilities to submit information, reports, test results, or descriptions of corrective actions within 30 days. While facilities may have taken some corrective action on their own, the orders did not require injunctive relief that would bring the facility back into compliance, specific measures to prevent similar violations from recurring or provide for independent verification that those measures were effective.⁵ This can increase the risk of future violations and weaken incentives for facilities to invest in lasting compliance.
- 4) **LDEQ relied on warning letters in response to recurring compliance problems.** Several facilities received multiple warning letters over the review period. While warning letters can be appropriate for isolated violations, repeatedly issuing them without clear procedures for taking formal enforcement action raises questions about whether LDEQ’s response is sufficient to address ongoing compliance problems and discourage future violations.

⁴ These figures are conservative. In a small number of enforcement actions, we excluded exceptionally old violations that were reported to the state in reports years after they had occurred and instead used the next oldest violation identified in the same enforcement actions. Some of the excluded violations dated back decades and were not reported or identified until substantially later (see Section 1 of this letter).

⁵ According to [EPA’s Basic Information on Enforcement](#) “Injunctive Relief requires a regulated entity to perform, or refrain from performing, some designated action. It also brings the entity into compliance with environmental laws.”

Table 1. EIP review of 28 formal and 50 informal enforcement actions in Lake Charles, LA from January 2021 through August 2026

Type of Action	Actions	Number of Days			Number of Years		
		Min	Avg	Max	Min	Avg	Max
Consolidated Compliance Orders & Notices of Potential Penalty (23 Actions)	Earliest violation to inspection/file review	0	1429	2955	0.0	3.9	8.1
	File review or inspection to CCONPP	0	679	1828	0.0	1.9	5.0
	Earliest violation to CCONPP	248	2109	4169	0.7	5.8	11.4
Notices of Potential Penalty (5 Actions)	Earliest violation to inspection/file review	180	1087	2159	0.5	3.0	5.9
	File review or inspection to NPP	78	8008	45321	0.2	21.9	124.2
	Earliest violation to NPP	640	1467	3017	1.8	4.0	8.3
Warning Letters (45 Actions) & Notices of Violation (5 Actions)	Earliest violation to WL	36	609	3846	0.1	1.7	10.5
	Earliest violation to NOV	1933	3303	4572	5.3	9.0	12.5

Note: The underlying data are included as Attachments B, C, and D to this letter. In this table, the “earliest violation” refers to the earliest listed violation in the enforcement document, with the exception of especially old violations that were reported to the state years after they had occurred (see examples in Section 1 of this letter).

1) LDEQ Often Identified and Addressed Violations Years After They Occurred

LDEQ’s administrative enforcement process involves several steps. Potential violations may first be identified through inspections, facility self-reports, file reviews, incidents, or complaints. Once compliance staff identify violations warranting enforcement review, the matter may be referred to the Enforcement Division, which evaluates the referral and determines the appropriate enforcement response.

In its 2021 report, *Monitoring and Enforcement of Air Quality*, the Louisiana Legislative Auditor identified enforcement timeliness as one of the most significant weaknesses in LDEQ’s enforcement program.⁶ The Auditor found that violations were often identified years after they occurred and that enforcement actions frequently were not issued until years after that. The Auditor stated that LDEQ “could strengthen its monitoring and enforcement processes by identifying violations and issuing enforcement actions more timely.” The Auditor reported that the average time to issue an enforcement action had increased from 289 days in fiscal year 2015 to 585 days in fiscal year 2019. Our review of enforcement actions between January 2021 and August 2026 in the Lake Charles region indicates that this significant problem persists.

LDEQ’s 365-day enforcement deadline does not address unreasonable delays before referral. In response to the 2021 Legislative Auditor review, LDEQ established a 365-day benchmark in 2024 for issuing an enforcement action following referral to the enforcement division.⁷ While this benchmark represents a promising improvement, its existence alone does not allow LDEQ to course correct for delays that occur before a matter is referred for enforcement. Our review identified substantial delays between the occurrence of violations and the issuance of an enforcement action, due to either delays in identifying violations or delays in acting on information already available to LDEQ.

⁶ Daryl G. Purpera et al., *Monitoring and Enforcement of Air Quality*, Department of Environmental Quality, Audit Control # 40200007 (January 2021), [https://app.lla.state.la.us/publicreports.nsf/0/4f3372abdd0f271862586630067c25d/\\$file/00022660a.pdf?openelement&.7773098](https://app.lla.state.la.us/publicreports.nsf/0/4f3372abdd0f271862586630067c25d/$file/00022660a.pdf?openelement&.7773098).

⁷ Michael Waguespack et al., *Implementation Status of Recommendations from Select Performance Audits Issued During Fiscal Year 2023*, (May 2026), [https://app.lla.state.la.us/publicreports.nsf/0/01c15b5d44d7619d86258df400413fdb/\\$file/0000a78bb.pdf?openelement&.7773098](https://app.lla.state.la.us/publicreports.nsf/0/01c15b5d44d7619d86258df400413fdb/$file/0000a78bb.pdf?openelement&.7773098).

LDEQ should therefore measure not only how long it takes to issue an enforcement action after referral, but also how promptly it detects violations and refers matters for enforcement. These measures would provide a more complete picture of whether the Department is identifying and addressing noncompliance promptly enough to prevent violations from continuing and recurring.

Delayed enforcement of self-reported violations. Several of the enforcement actions we reviewed illustrate how long violations can remain unresolved after LDEQ receives information about them. For example, Compliance Order AE-CN-22-00301, issued to the Indorama Ventures Olefins Westlake Ethylene Plant in July 2025, addressed violations identified through a July 2020 information request and a February 2021 inspection. The order cites failures to report benzene concentration ranges for waste streams in 2018, 2019, 2020, and 2021, as well as a 2019 benzene spill above the reportable quantity. Despite the seriousness of these violations and the well-established risks of benzene to public health and the environment, LDEQ did not issue the order until four to seven years after the underlying events occurred.

Similarly, Compliance Order AE-CN-24-00622, issued to the Phillips 66 Lake Charles Refinery in November 2025, was based on a file review covering July 2020 through December 2023. The order addresses repeated exceedances of permit limits for multiple pollutants, described as “not specified,” that were disclosed through Title V reports over several years. LDEQ did not issue the order until five years or more after several of the reported violations occurred.

These examples are particularly concerning because the Title V program relies on facilities to submit regular monitoring reports, report deviations from permit requirements, and certify each year whether they are complying with their permits. LDEQ must review this information and respond to any violations in a timely manner. When violations disclosed through these reports are not reviewed and addressed for years, the reports become less effective as a tool for ensuring compliance. Facilities also have less incentive to devote resources to accurate and timely reporting if they are not held accountable through enforcement for promptly evaluating and resolving violations and paying penalties for noncompliance.

Delayed enforcement of substantially older violations. Some enforcement actions also identified violations that had occurred many years earlier. For example, Compliance Order AE-CN-20-00170, issued to Equistar Chemicals Lake Charles Polymers Facility in October 2023, identifies a violation dating to 2003 that the facility reported in 2017. Compliance Orders AE-CN-20-00559 and AE-CN-23-00665, issued to Phillips 66 in April 2021 and January 2025, respectively, identify violations dating to 1994, 1998, and 2005 that were not reported or identified until substantially later—in some cases decades later. Specifically, a vapor combustor began operating on December 9, 1998, but Phillips 66 did not submit its operating plan to LDEQ until August 2, 2022. Moreover, fuel in another vapor combustor had excess hydrogen sulfide and had exceeded sulfur dioxide emissions limits since October 1, 2005, but Phillips 66 did not report these violations to LDEQ until 2021. These examples illustrate the importance of inspections and other compliance monitoring activities that can identify violations independently, rather than relying solely on facilities to report them.

Delayed identification of violations that EPA considers high priority. A High Priority Violation (HPV) is a violation that EPA considers sufficiently serious to warrant heightened enforcement attention. EPA’s HPV

Policy establishes procedures for identifying and addressing significant Clean Air Act violations.⁸ In Compliance Order AE-CN-20-00559 issued to Phillips 66 in April 2021, LDEQ identified January 20, 2021 as the date it determined the violation was an HPV, but the order referenced a 2019 inspection.⁹ In Compliance Order AE-CN-23-00665 issued to Phillips 66 in January 2025, LDEQ classified violations as HPVs on October 25, 2024, although the order addressed substantially older conduct and referenced inspections conducted in 2021 and 2023. In May 2026, LDEQ issued Compliance Order AE-CN-23-00192 to Rain CII Carbon LLC, a producer of calcined petroleum coke used in aluminum production. The enforcement record identified a June 2021 inspection and an April 2026 file review, but LDEQ did not make the HPV determination until 2026. These examples do not establish that LDEQ failed to comply with EPA's HPV timeliness requirements, but they raise concerns about whether significant violations are being identified promptly enough to ensure timely enforcement and corrective action.¹⁰

2) Delays Can Jeopardize LDEQ's Ability to Obtain Civil Penalties

Delays in reviewing or acting on reported violations can jeopardize LDEQ's ability to obtain civil penalties. Louisiana law generally gives the state five years to begin an action to assess or enforce civil penalties. The five-year period begins when the violation is first reported to LDEQ in accordance with applicable laws and regulations. See La. R.S. 30:2025(H). Our review identified instances in which information concerning potential violations had been available to LDEQ for years before formal enforcement, raising concerns about whether delayed action could prevent the Department from obtaining appropriate penalties.

The Indorama Ventures Olefins matter illustrates the potential consequence of delay. In March 2025, LDEQ issued Notice of Violation AE-N-20-00381 addressing violations dating to 2016 and 2019. In April 2026, counsel for Indorama argued in AE-N-20-00381¹¹ that the alleged violations were based on correspondence, reports, or inspections provided to LDEQ more than five years earlier and that the deadline for seeking penalties had therefore passed. Whether or not that defense ultimately succeeds, the matter illustrates that delayed enforcement is not merely an administrative concern. It can limit LDEQ's ability to obtain penalties and weaken incentives for facilities to comply with environmental requirements.

⁸ OECA US EPA, "Revised Timely and Appropriate (T and A) Enforcement Response to High Priority Violations (HPVs) Policy," Other Policies and Guidance, January 15, 2015, <https://www.epa.gov/enforcement/revised-timely-and-appropriate-t-and-enforcement-response-high-priority-violations-hpvs>.

⁹ The HPV determination date is the date a delegated agency, in this case LDEQ, makes a determination that the violation is significant and meets the criteria outlined in EPA's HPV policy.

¹⁰ EPA periodically reviews state compliance and enforcement programs through its State Review Framework (SRF), which evaluates state performance using national enforcement metrics and reviews of individual case files. In its most recent review, Round 4, EPA reviewed seven LDEQ HPV determinations and found that all seven met EPA's timeliness requirements for HPV identification. EPA nevertheless identified HPV identification and reporting as "Priority Issues to Address" because of deficiencies in LDEQ's reporting of HPV data to EPA's ICIS database. EPA's finding has two important limitations. First, the HPV timeliness measure runs from the relevant compliance-monitoring or discovery activity and therefore does not capture delays that occur before that activity takes place. Second, the measure evaluates the timeliness of violations that LDEQ designates as HPVs; it does not capture violations that should have been designated as HPVs but were not. Our review raises concerns about both issues.

¹¹ Lauren Ruckiski, Kean Miller LLP letter to Katie Bowers, LDEQ RE: Indorama Ventures Olefins LLC Enforcement Tracking No. AE-N-20-00381 (April 30, 2025), EDMS Doc ID 14751837.

3) LDEQ's Formal Enforcement Actions Did Not Require Specific Corrective Measures to Address the Underlying Causes of Violations

The 28 enforcement actions we reviewed did not require specific corrective measures and did not provide sufficient assurance that the underlying causes of the violations had been identified. Without enforceable measures designed to independently verify compliance and address root causes of noncompliance, there is an increased risk that violations will recur and reduced incentive for the facility to invest in compliance.

Compliance Order AE-CN-22-00617, issued to Westlake Chemical OPCO LP in June 2023, addressed unauthorized flaring events resulting in excess emissions of benzene and 1,3-butadiene, but did not impose enforceable operational changes, enhanced monitoring, or other specific measures designed to prevent similar events from recurring. Compliance Order AE-CN-22-00301, issued to Indorama in July 2025, addressed benzene-related violations but likewise did not require monitoring upgrades, corrective-action plans, root-cause analyses, or verification measures.

Similarly, Compliance Order AE-CN-24-00209 issued to Westlake US2 in August 2024 addressed multiple excess emission incidents, including recurring self-reported deviations and a January 2022 tank explosion that, in addition to emitting toxic pollutants, left six people injured. More than two years after the explosion, the resulting order primarily required the facility to provide additional information and reports and did not require implementation of operational measures designed to prevent similar life-threatening incidents in the future.

Compliance Order AE-CN-23-00665, issued to Phillips 66 in January 2025, addressed numerous sulfur dioxide exceedances identified during incident investigations spanning several years. Yet essentially, the order only required the facility to submit a written report describing actions taken or planned; it did not include enforceable operational changes, monitoring improvements, or compliance verification requirements.

These examples illustrate a significant weakness in LDEQ's enforcement response. While facilities may have taken some corrective action independently, the compliance orders themselves did not require specific measures to address the underlying causes of the violations or prevent similar problems from recurring. Formal enforcement should do more than document violations and require facilities to report their response, without regard for its effectiveness. It should require appropriate corrective measures, make those requirements enforceable, and provide for follow-up to verify that they are effective. Enforcement should result in return to compliance. Without these requirements, LDEQ has limited assurance that the problems have been corrected and that similar violations will not recur.

4) LDEQ Relied on Warning Letters in Response to Recurring Compliance Problems

Our review identified repeated compliance problems at several facilities, particularly Indorama Ventures Olefins and Westlake US2, which received ten and eight warning letters, respectively over a multi-year period.

At Indorama, LDEQ issued ten warning letters to the facility between June 2021 and June 2024, seven of which were for “unauthorized” discharges. Several of these warning letters appear to be associated in LDEQ's records with later compliance orders. For example, LDEQ issued a warning letter AE-L-22-00301 in March 2022 informing Indorama that it was forwarding the report from a recent inspection and noted areas of concern to the Enforcement Division. However, the areas of concern identified in the inspection were not included in a compliance order (AE-CN-22-00301) until July 2025—more than three years later.

Similarly, LDEQ issued Compliance Order AE-CN-24-00209 to Westlake US2, in August 2024. Prior to this order, LDEQ issued seven warning letters to Westlake US2, beginning in March 2021, more than 3 years before issuing a formal enforcement action.

The warning letters we reviewed generally request a written response and encourage corrective action but contain little information regarding follow-up inspections or enforcement escalation criteria. Moreover, the frequency at which they are issued raises questions about whether LDEQ's enforcement response is sufficient to correct noncompliance, address its underlying causes, and achieve sustained compliance.

Conclusion

Our review raises serious concerns about whether LDEQ's current practices are achieving its objectives. In its “Understanding the LDEQ Enforcement Process” EnviroSchool training, LDEQ explains that its mission includes regular inspections, timely investigations, thorough review, and enforcement actions that document violations and provide a path to compliance.¹² The training also explains that the purpose of enforcement is to “deter future non-compliance and eliminate the economic incentives for non-compliance.”

Unfortunately, five years after the Legislative Auditor's 2021 report, significant concerns remain regarding the timeliness and effectiveness of LDEQ's compliance and enforcement program in the Lake Charles region. Our findings highlight the need for more timely identification of violations and enforcement, stronger corrective-action requirements, independent compliance verification, and procedures for responding to recurring violations.

Recommendations

To ensure LDEQ's delegated environmental programs are operating effectively and providing adequate protection of human health and the environment, EIP recommends that LDEQ:

- Review inspection and other compliance monitoring procedures for identifying violations, including specified time frames for inspecting facilities, reviewing self-reported violations, initiating enforcement actions, and resolving enforcement cases.
- Improve procedures to review Title V monitoring reports, deviation reports, and compliance certifications both to promptly identify compliance issues and to require facilities to address deviations within a reasonable timeframe.

¹² Wayne Slater, “Understanding the LDEQ Enforcement Process,” LDEQ EnviroSchool, December 21, 2020, <https://www.deq.louisiana.gov/assets/docs/EnviroSchool/2020Enforcement.pdf>.

- Supplement review of self-reported violations with targeted inspections and compliance verification activities designed to independently assess compliance.
- Develop a publicly-accessible system to track the age of violations and enforcement referrals.
- Identify and prioritize matters approaching deadlines for seeking civil penalties.
- Develop written procedures to track repeat violations and ensure recurring issues receive progressively stronger responses.
- Develop a formal, written policy governing the use of warning letters and when to escalate to formal enforcement.
- Require enforceable corrective measures, including corrective-action plans, independent audits, operational or equipment changes, and other appropriate injunctive relief, to address the underlying causes of violations and prevent recurrence.
- Conduct follow-up inspections or compliance verification activities after resolution of significant enforcement actions to confirm that corrective measures have been implemented and are effective.

We welcome the opportunity to discuss our findings and recommendations with you.

Sincerely,

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Enclosures (4)

Attachment A – Facilities Evaluated

Attachment B – Formal Enforcement Actions

Attachment C – Informal Enforcement Actions

Attachment D – Data definitions

Cc:

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Attachment A: Facility List

AI No.	Name	Address	City	State	Number of LDEQ Enforcement Actions (01/2021-08/2026)			
					CCONPP	NPP	WL	NOV
26073	BIO-LAB INC	910 I-10 W	WESTLAKE	LA	-	1	1	-
1250	CITGO PETROLEUM CORP - LAKE CHARLES MANUFACTURING COMPLEX	4401 HWY 108 S	SULPHUR	LA	2	-	1	-
3766	CITGO PETROLEUM CORP - LAKE CHARLES TRUCK LOADING FACILITY	4401 HWY 108	SULPHUR	LA	-	1	-	-
1253	EQUISTAR CHEMICALS LP - LAKE CHARLES POLYMERS FACILITY	4101 HWY 108 S	WESTLAKE	LA	1	-	1	-
1244	FIRESTONE POLYMERS LLC - LAKE CHARLES FACILITY	1801 HWY 108 E	SULPHUR	LA	1	-	3	-
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	4300 HWY 108	WESTLAKE	LA	4	-	10	1
11496	KRONOS LOUISIANA INC	3300 BAYOU D'INDE RD	WESTLAKE	LA	1	-	3	1
203831	LACC LLC US - ETHYLENE & DERIVATIVES PLANT	2200 BAYOU D'INDE PASS	WESTLAKE	LA	-	-	1	-
42895	LINDE INC - SULPHUR PLANT	4451 S HWY 108	WESTLAKE	LA	-	-	-	-
195519	LOTTE CHEMICAL LOUISIANA LLC	2200 BAYOU D'INDE PASS	WESTLAKE	LA	2	-	3	1
226602	LOUISIANA INTEGRATED POLYETHYLENE JV LLC	2201 OLD SPANISH TRAIL	WESTLAKE	LA	-	1	1	-
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	2200 OLD SPANISH TRAIL	WESTLAKE	LA	3	-	2	-
185422	QEMETICA US SILICA LLC	3150 PETE MANENA RD	WESTLAKE	LA	-	-	2	-
3439	RAIN CII CARBON LLC - LAKE CHARLES CALCINING PLANT	1920 PAK TANK RD	SULPHUR	LA	1	-	1	-
3271	SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX	2201 OLD SPANISH TRAIL	WESTLAKE	LA	-	1	1	-
1251	W R GRACE & CO-CONN - LAKE CHARLES FACILITY	1800 DAVISON RD	SULPHUR	LA	-	-	-	-

Attachment A: Facility List

AI No.	Name	Address	City	State	Number of LDEQ Enforcement Actions (01/2021-08/2026)			
					CCONPP	NPP	WL	NOV
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	900 HWY 108	SULPHUR	LA	2	1	2	-
4013	WESTLAKE CHEMICALS & VINYLs LLC - WESTLAKE LAKE CHARLES NORTH	1600 VCM PLANT RD	WESTLAKE	LA	-	1	2	-
27518	WESTLAKE PETROCHEMICALS LLC - POLY III	900 HWY 108	SULPHUR	LA	1	-	-	-
9061	WESTLAKE POLYMERS LLC - POLYETHYLENE MANUFACTURING COMPLEX	3525 CITIES SERVICE HWY	SULPHUR	LA	1	-	3	1
17904	WESTLAKE STYRENE LLC - MARINE TERMINAL	1820 PAK TANK RD	SULPHUR	LA	1	-	-	-
18070	WESTLAKE STYRENE LLC - STYRENE MONOMER PRODUCTION FACILITY	900 HWY 108	SULPHUR	LA	-	-	-	-
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	1300 PPG DR	WESTLAKE	LA	2	-	8	1

Attachment B: Formal Enforcement

CCONPP												
AI No.	Facility Name	Enforcement Case ID	Date of earliest violation identified*	Date of inspection**	Date of file review	Warning Letter Date	Warning Letter Tracking ID	Warning Letter EDMS Doc ID	CCONPP Date	CCONPP EDMS Doc ID	Violations found during inspections (Yes/No)	Self reported TV violations (Yes/No)
1244	FIRESTONE POLYMERS LLC - LAKE CHARLES FACILITY	AE-CN-22-00391	10/13/2013	11/15/2021	1/16/2025	N/A	N/A	N/A	3/13/2025	14690037	Yes	Yes
1250	CITGO PETROLEUM CORP - LAKE CHARLES MANUFACTURING COMPLEX	AE-CN-21-00378	7/11/2017	N/A	10/5/2021	N/A	N/A	N/A	10/20/2021	12946155	N/A	Yes
1250	CITGO PETROLEUM CORP - LAKE CHARLES MANUFACTURING COMPLEX	AE-CN-22-00929	9/9/2019	9/9/2019	7/11/2024	1/3/2023	AE-L-22-00929	13605456	8/26/2024	14453726	Yes	Yes
1253	EQUISTAR CHEMICALS LP - LAKE CHARLES POLYMERS FACILITY	AE-CN-20-00170	12/31/2016 *	8/27/2019	8/16/2023	N/A	N/A	N/A	10/24/2023	14064439	Yes	Yes
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-CN-24-00209	1/1/2018	12/11/2023	7/11/2024	4/5/2024; 8/10/2023; 5/16/2023; 3/24/2023	AE-L-24-00209; AE-L-23-00571; AE-L-23-00360; AE-L-23-00198	14252907; 13957622; 13823121; 13742852	8/6/2024	14433343	Yes	Yes
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-CN-25-00262	2/2/2023	4/17/2025	4/15/2025	N/A	N/A	N/A	5/14/2026	15211897	No	Yes
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-CN-20-00559	6/12/2015 *	11/12/2019	N/A	N/A	N/A	N/A	4/15/2021	12663308	Yes	No
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-CN-23-00665	12/16/2021 *	N/A	1/9/2025	9/11/2023	AE-L-23-00665	13989803	1/28/2025	14649056	N/A	Yes
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-CN-24-00622	7/1/2020	N/A	10/7/2025	N/A	N/A	N/A	11/6/2025	14996450	No	Yes
3439	RAIN CII CARBON LLC - LAKE CHARLES CALCINING PLANT	AE-CN-23-00192	7/1/2018 *	6/22/2021	4/8/2026	3/22/2023	AE-L-23-00192	13742856	5/15/2026	15222841	Yes	Yes
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-22-00614	7/31/2020	6/2/2023	not stated	8/10/2022	AE-L-22-00614	13432992	6/7/2023	13857818	Yes	Yes
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-20-00554	1/31/2016 *	2/10/2020	2/6/2025	N/A	N/A	N/A	2/11/2025	14650221	No	Yes
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-22-00301	1/1/2018	2/2/2021	6/25/2025	3/29/2022	AE-L-22-00301	13211966	7/7/2025	14836114	Yes	Yes
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-24-00337	9/12/2018	3/12/2024	7/31/2025	6/13/2024	AE-L-24-00337	14337632	1/15/2026	15056703	No	Yes
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-CN-18-00617	1/1/2016	5/9/2018	4/10/2019	8/31/2018	AE-L-18-00617	11302467	1/8/2021	12528076	Yes	Yes
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-CN-24-00619	12/31/2019	9/23/2024	9/22/2025	N/A	N/A	N/A	9/24/2025	14937374	Yes	Yes
9061	WESTLAKE POLYMERS LLC - POLYETHYLENE MANUFACTURING COMPLEX	AE-CN-23-00750	7/28/2016	N/A	7/3/2024	10/5/2023	AE-L-23-00750	14010832	7/8/2024	14370570	N/A	Yes
11496	KRONOS LOUISIANA INC	AE-CN-24-00105	7/24/2019	N/A	9/17/2024	2/28/2024	AE-L-24-00105	14202950	11/7/2024	14548347	No	Yes
27518	WESTLAKE PETROCHEMICALS LLC - POLY III	AE-CN-21-00023	11/18/2018	N/A	4/25/2024	N/A	N/A	N/A	4/25/2024	14276095	N/A	Yes
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-CN-21-00380	10/17/2020	4/14/2021	6/2/2021	N/A	N/A	N/A	6/22/2021	12770340	Yes	No

Attachment B: Formal Enforcement

CCONPP										
AI No.	Facility Name	Enforcement Case ID	Settlement Date	Settlement EDMS Doc ID	Penalty Amount (\$)	Injunctive Relief*** (Yes/No)	High Priority Violation (Yes/No)	Earliest violation to inspection/ file review (days)	File review or inspection to CCONPP (days)	Earliest violation to CCONPP (days)
1244	FIRESTONE POLYMERS LLC - LAKE CHARLES FACILITY	AE-CN-22-00391	TBD	N/A	TBD	TBD	No	2,955	1,214	4,169
1250	CITGO PETROLEUM CORP - LAKE CHARLES MANUFACTURING COMPLEX	AE-CN-21-00378	1/29/2026	15085570	\$160,000	No	No	1,547	15	1,562
1250	CITGO PETROLEUM CORP - LAKE CHARLES MANUFACTURING COMPLEX	AE-CN-22-00929	7/16/2026	15288742	TBD	TBD	No	0	1,813	1,813
1253	EQUISTAR CHEMICALS LP - LAKE CHARLES POLYMERS FACILITY	AE-CN-20-00170	10/30/2025	14988514	\$90,090	No	No	969	1,519	2,488
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-CN-24-00209	TBD	N/A	TBD	TBD	No	2,170	239	2,409
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-CN-25-00262	TBD	N/A	TBD	TBD	No	803	394	1,197
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-CN-20-00559	TBD	N/A	TBD	TBD	Yes	1,614	520	2,134
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-CN-23-00665	TBD	N/A	TBD	TBD	No	1,120	19	1,139
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-CN-24-00622	TBD	N/A	TBD	TBD	No	1,924	30	1,954
3439	RAIN CII CARBON LLC - LAKE CHARLES CALCINING PLANT	AE-CN-23-00192	TBD	N/A	TBD	TBD	Yes	1,087	1,788	2,875
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-22-00614	6/2/2025	14801900	\$33,800	No	No	1,036	5	1,041
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-20-00554	TBD	N/A	TBD	TBD	No	1,471	1,828	3,299
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-22-00301	TBD	N/A	TBD	TBD	No	1,128	1,616	2,744
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-CN-24-00337	TBD	N/A	TBD	TBD	No	2,008	674	2,682
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-CN-18-00617	TBD	N/A	TBD	TBD	No	859	975	1,834
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-CN-24-00619	TBD	N/A	TBD	TBD	No	1,728	366	2,094
9061	WESTLAKE POLYMERS LLC - POLYETHYLENE MANUFACTURING COMPLEX	AE-CN-23-00750	1/13/2026	15050416	\$55,000	No	No	2,897	5	2,902
11496	KRONOS LOUISIANA INC	AE-CN-24-00105	TBD	N/A	TBD	TBD	No	1,882	51	1,933
27518	WESTLAKE PETROCHEMICALS LLC - POLY III	AE-CN-21-00023	7/23/2026	15295736	\$26,000	No	No	1,985	0	1,985
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-CN-21-00380	12/12/2022	13592126	\$250,000	No	Yes	179	69	248

Attachment B: Formal Enforcement

CCONPP												
AI No.	Facility Name	Enforcement Case ID	Date of earliest violation identified*	Date of inspection**	Date of file review	Warning Letter Date	Warning Letter Tracking ID	Warning Letter EDMS Doc ID	CCONPP Date	CCONPP EDMS Doc ID	Violations found during inspections (Yes/No)	Self reported TV violations (Yes/No)
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-CN-20-00047	9/21/2018	6/26/2019	4/15/2024	N/A	N/A	N/A	5/30/2024	14317918	Yes	Yes
17904	WESTLAKE STYRENE LLC - MARINE TERMINAL	AE-CN-21-00032	3/31/2017	N/A	3/10/2022	N/A	N/A	N/A	3/16/2022	13198413	No	Yes

NPP												
AI No.	Facility Name	Enforcement Case ID	Date of earliest violation identified	Date of inspection*	Date of file review	Warning Letter Date	Warning Letter Tracking ID	Warning Letter/NOV EDMS Doc ID	NPP Date	NPP EDMS Doc ID	Violations found during inspections (Yes/No)	Self reported TV violations (Yes/No)
3271	SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX	AE-PP-20-00460	7/23/2019	N/A	10/31/2020	N/A	N/A	N/A	8/23/2021	12885916	No	No
3766	CITGO PETROLEUM CORP - LAKE CHARLES TRUCK LOADING FACILITY	AE-XP-23-00583	4/30/2022	not stated	not stated	3/22/2023	AE-L-23-00192	13742856	1/30/2024	14169227	No	No
4013	WESTLAKE CHEMICALS & VINYLs LLC - WESTLAKE LAKE CHARLES NORTH	AE-PP-24-00409	10/30/2017	9/28/2023	N/A	N/A	N/A	N/A	2/2/2026	15091806	Yes	No
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-PP-24-00645	9/21/2018	10/19/2023	N/A	N/A	N/A	N/A	12/17/2025	15031038	Yes	No
26073	BIO-LAB INC	AE-PP-23-00666	9/30/2022	N/A	11/14/2024	2/28/2024	AE-L-24-00105	14202950	1/31/2025	14643376	No	No
226602	LOUISIANA INTEGRATED POLYETHYLENE JV LLC	AE-PP-22-00129	1/10/2021	7/9/2021	3/17/2023	N/A	N/A	N/A	6/12/2023	13864888	Yes	Yes

* The CCONPPs associated with the starred entries exclude the earliest violations as outliers and list the next most recent violation instead.

** Inspection date only noted if violations identified during the inspeciton are included in the CCONPP

*** According to EPA injunctive reilef requires regulated entity to perform, or refrain from performing, some designated action and brings the entity into compliance with environmental laws.

Attachment B: Formal Enforcement

CCONPP										
AI No.	Facility Name	Enforcement Case ID	Settlement Date	Settlement EDMS Doc ID	Penalty Amount (\$)	Injunctive Relief*** (Yes/No)	High Priority Violation (Yes/No)	Earliest violation to inspection/ file review (days)	File review or inpsection to CCONPP (days)	Earliest violation to CCONPP (days)
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-CN-20-00047	TBD	N/A	TBD	TBD	No	278	1,800	2,078
17904	WESTLAKE STYRENE LLC - MARINE TERMINAL	AE-CN-21-00032	10/23/2023	14038626	\$4,500	No	No	1,805	6	1,811

NPP										
AI No.	Facility Name	Enforcement Case ID	Settlement Date	Settlement EDMS Doc ID	Penalty Amount (\$)	Injunctive Relief* (Yes/No)	High Priority Violation (Yes/No)	Earliest violation to inspection/ file review (days)	File review or inpsection to NPP (days)	Earliest violation to NPP (days)
3271	SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX	AE-PP-20-00460	9/4/2024	14464656	\$10,250	No	No	466	296	762
3766	CITGO PETROLEUM CORP - LAKE CHARLES TRUCK LOADING FACILITY	AE-XP-23-00583	TBD	N/A	\$1,000	No	No	unknown	45321	640
4013	WESTLAKE CHEMICALS & VINYLs LLC - WESTLAKE LAKE CHARLES NORTH	AE-PP-24-00409	TBD	N/A	TBD	TBD	No	2159	858	3017
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-PP-24-00645	TBD	N/A	TBD	TBD	No	1854	790	2644
26073	BIO-LAB INC	AE-PP-23-00666	TBD	N/A	TBD	TBD	No	776	78	854
226602	LOUISIANA INTEGRATED POLYETHYLENE JV LLC	AE-PP-22-00129	10/31/2025	14988502	\$32,355	No	No	180	703	883

* The CCONPPs associated with the starred entries exclude the earliest violations

** Inspection date only noted if violations identified during the inspeciton are inclu

*** According to EPA injunctive reilef requires regulated entity to perform, or refra

Attachment C: Informal Enforcement

Warning Letters							
AI No.	Facility Name	Warning Letter Tracking ID	Date of earliest violation identified	Warning Letter Date	Warning Letter EDMS Doc Id	Triggered by (Incident/ Inspection)	Earliest violation to Warning Letter (days)
1253	EQUISTAR CHEMICALS LP - LAKE CHARLES POLYMERS FACILITY	AE-L-20-00170	7/23/2018	2/26/2020	12107544	Incident	583
11496	KRONOS LOUISIANA INC	AE-L-20-00217	10/11/2019	3/5/2020	12107554	Incident	146
4013	WESTLAKE CHEMICALS & VINYLs LLC - WESTLAKE LAKE CHARLES NORTH	AE-L-20-00761	4/30/2020	10/20/2021	12960332	Incident	538
1244	FIRESTONE POLYMERS LLC - LAKE CHARLES FACILITY	AE-L-21-00319	3/9/2020	4/29/2021	12689022	Inspection	416
1244	FIRESTONE POLYMERS LLC - LAKE CHARLES FACILITY	AE-L-26-00038	9/11/2025	2/5/2026	15106673	Inspection	147
1244	FIRESTONE POLYMERS LLC - LAKE CHARLES FACILITY	AE-L-26-00359	4/29/2026	7/9/2026	15272108	Inspection	71
1250	CITGO PETROLEUM CORP - LAKE CHARLES MANUFACTURING COMPLEX	AE-L-22-00929	9/9/2019	1/3/2023	13605456	Incident	1212
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-21-00223	11/10/2020	3/29/2021	12627889	Incident	139
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-22-00612	2/10/2022	8/10/2022	13432990	Inspection	181
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-23-00155	11/1/2021	3/21/2023	13739993	Incident	505
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-23-00198	12/10/2022	3/24/2023	13742852	Inspection	104
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-23-00571	3/3/2023	8/10/2023	13957622	Inspection	160
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-24-00209	12/11/2023	4/5/2024	14252907	Inspection	116

Attachment C: Informal Enforcement

Warning Letters							
AI No.	Facility Name	Warning Letter Tracking ID	Date of earliest violation identified	Warning Letter Date	Warning Letter EDMS Doc Id	Triggered by (Incident/ Inspection)	Earliest violation to Warning Letter (days)
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-25-00262	2/18/2025	6/20/2025	14829624	Inspection	122
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-L-22-00617	12/17/2021	8/12/2022	13432976	Inspection	238
2538	PHILLIPS 66 CO - LAKE CHARLES REFINERY	AE-L-23-00665	4/3/2023	9/11/2023	13989803	Inspection	161
3271	SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX	AE-L-21-00228	10/31/2020	3/29/2021	12627887	Inspection	149
3439	RAIN CII CARBON LLC - LAKE CHARLES CALCINING PLANT	AE-L-23-00192	7/31/2018	3/22/2023	13742856	Incident	1695
4013	WESTLAKE CHEMICALS & VINYLs LLC - WESTLAKE LAKE CHARLES NORTH	AE-L-24-00409	9/25/2023	7/31/2024	14427982	Incident	310
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-21-00444	7/31/2020	6/10/2021	12753899	Inspection	314
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-22-00301	5/31/2019	3/29/2022	13211966	Inspection	1033
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-22-00374	8/23/2021	4/27/2022	13263640	Inspection	247
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-22-00435	12/29/2021	6/2/2022	13321217	Inspection	155
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-22-00468	12/9/2021	6/10/2022	13326580	Inspection	183
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-22-00551	1/19/2022	7/15/2022	13376653	Inspection	177
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-22-00614	5/31/2022	8/10/2022	13432992	Inspection	71

Attachment C: Informal Enforcement

Warning Letters							
AI No.	Facility Name	Warning Letter Tracking ID	Date of earliest violation identified	Warning Letter Date	Warning Letter EDMS Doc Id	Triggered by (Incident/ Inspection)	Earliest violation to Warning Letter (days)
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-23-00366	9/9/2022	5/15/2023	13823117	Inspection	248
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-23-00372	6/10/2022	5/24/2023	13839476	Inspection	348
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-L-24-00337	4/29/2022	6/13/2024	14337632	Incident	776
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-L-24-00619	9/16/2024	10/22/2024	14538759	Inspection	36
9061	WESTLAKE POLYMERS LLC - POLYETHYLENE MANUFACTURING COMPLEX	AE-L-22-00289	4/30/2013	3/25/2022	13211980	Incident	3251
9061	WESTLAKE POLYMERS LLC - POLYETHYLENE MANUFACTURING COMPLEX	AE-L-23-00750	7/8/2023	10/5/2023	14010832	Inspection	89
9061	WESTLAKE POLYMERS LLC - POLYETHYLENE MANUFACTURING COMPLEX	AE-L-25-00599	1/31/2016	12/11/2025	15025802	Incident	3602
11496	KRONOS LOUISIANA INC	AE-L-24-00105	3/23/2022	2/28/2024	14202950	Incident	707
11496	KRONOS LOUISIANA INC	AE-L-26-00114	9/24/2025	3/17/2026	15141253	Inspection	174
26073	BIO-LAB INC	AE-L-23-00666	3/22/2023	9/11/2023	13989799	Inspection	173
185422	QEMETICA US SILICA LLC	AE-L-26-00387	9/30/2022	7/17/2026	15284051	Incident	1386
185422	QEMETICA US SILICA LLC	AE-L-26-00388	1/5/2016	7/17/2026	15284053	Incident	3846
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-L-21-00380	4/11/2021	5/21/2021	12734981	Inspection	40
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-L-22-00291	10/24/2021	3/25/2022	13211976	Inspection	152
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-L-23-00191	3/31/2019	3/22/2023	13742854	Incident	1452

Attachment C: Informal Enforcement

Warning Letters							
AI No.	Facility Name	Warning Letter Tracking ID	Date of earliest violation identified	Warning Letter Date	Warning Letter EDMS Doc Id	Triggered by (Incident/ Inspection)	Earliest violation to Warning Letter (days)
203831	LACC LLC US - ETHYLENE & DERIVATIVES PLANT	AE-L-22-00685	1/13/2020	9/7/2022	13458909	Incident	968
226602	LOUISIANA INTEGRATED POLYETHYLENE JV LLC	AE-L-22-00129	6/29/2021	2/9/2022	13158609	Inspection	225
6164	WESTLAKE CHEMICAL OPCO LP - WESTLAKE PETROCHEMICAL COMPLEX	AE-L-18-00617	3/31/2018	8/31/2018	11302467	Inspection	153
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-L-23-00360	1/26/2022	5/15/2023	13823121	Inspection	474

Notices of Violation							
AI No.	Facility Name	NOV Tracking ID	Date of earliest violation identified	NOV Date	NOV EDMS Doc Id	Triggered by (Incident/ Inspection)	Earliest violation to NOV (days)
9061	WESTLAKE POLYMERS LLC - POLYETHYLENE MANUFACTURING COMPLEX	AE-N-22-00289	1/1/2012	7/8/2024	14370568	Incident	4572
1255	WESTLAKE US 2 LLC - WESTLAKE LAKE CHARLES SOUTH	AE-N-19-00974	1/1/2017	8/6/2024	14433351	Incident	2774
5337	INDORAMA VENTURES OLEFINS LLC - WESTLAKE ETHYLENE PLANT	AE-N-20-00381	4/7/2016	3/24/2025	14702856	Incident	3273
11496	KRONOS LOUISIANA INC	AE-N-20-00672	1/3/2014	11/7/2024	14548343	Incident	3961
195519	LOTTE CHEMICAL LOUISIANA LLC	AE-N-24-00282	2/13/2019	5/30/2024	14317916	Incident	1933

Attachment D: Data Definitions

Data Field		Description
Attachment A: Facility List		
<i>Source ID</i>		ICIS-Air Facility Identification Number
<i>AI No.</i>		LDEQ Agency Interest Number
<i>Name</i>		Facility Name
<i>Address</i>		Facility Address
<i>City</i>		Facility City
<i>State</i>		Facility State
<i>Number of LDEQ Enforcement Actions (01/2021-08/2026)</i>	<i>CCONPP</i>	Count of CCONPPs identified for facility
	<i>NPP</i>	Count of NPPs identified for facility
	<i>WL</i>	Count of Warning Letters identified for facility
	<i>NOV</i>	Count of NOVs identified for facility

Attachment B: Formal Enforcement		
<i>AI No.</i>		LDEQ Agency Interest Number
<i>Facility Name</i>		Facility Name
<i>Enforcement Case ID</i>		LDEQ Case Identification Number as listed on CCONPP/NPP
<i>Date of earliest violation identified</i>		Earliest violation listed in CCONPP/NPP. A subset of the earliest violations (noted with an "**") were reported in Title V reports several years after they had occurred. In those cases, the next oldest violation is listed.
<i>Date of inspection *</i>		The dates of any inspections noted in the CCONPP/NPP. The inspection date is only noted if violations identified during the inspection are included in the CCONPP/NPP.
<i>Date of file review</i>		The dates of any file reviews noted in the CCONPP/NPP.
<i>Warning Letter Date</i>		If a Warning Letter was issued for an incident or inspection that is cited in the CCONPP/NPP, the date the letter was issued.
<i>Warning Letter Tracking ID</i>		If a Warning Letter was issued for an incident or inspection cited in the CCONPP/NPP, the letter tracking number as listed on the Warning Letter.
<i>Warning Letter EDMS Doc ID</i>		If a Warning Letter was issued for an incident or inspection that is cited in the CCONPP/NPP, the letter EDMS document ID.
<i>CCONPP/NPP Date</i>		The date that the CCONPP/NPP was issued.
<i>CCONPP/NPP EDMS Doc ID</i>		The CCONPP/NPP EDMS document ID.

Attachment D: Data Definitions

Data Field	Description
Attachment B: Formal Enforcement	
<i>Violations found during inspections (Yes/No)</i>	Whether any of the violations listed in the CCONPP/NPP were identified during an inspection.
<i>Self reported TV violations (Yes/No)</i>	Whether any of the violations listed in the CCONPP/NPP were self-reported by the facility in semi-annual Title V deviation reports.
<i>Settlement Date</i>	If the CCONPP/NPP has been settled, the final settlement date.
<i>Settlement EDMS Doc ID</i>	If the CCONPP/NPP has been settled, the EDMS document ID for the final settlement agreement.
<i>Penalty Amount (\$)</i>	If the CCONPP/NPP has been settled, the penalty amount included in the settlement.
<i>Injunctive Relief (Yes/No)</i>	Whether any injunctive relief was included in the settlement. According to EPA injunctive relief requires regulated entity to perform, or refrain from performing, some designated action and brings the entity into compliance with environmental laws.
<i>High Priority Violation (Yes/No)</i>	Whether the CCONPP/NPP addresses a High Priority Violation, as identified in EPA's ECHO. These were identified by matching the enforcement action date listed in ECHO to the CCONPP/NPP date.
<i>Earliest violation to inspection/file review (days)</i>	The time between the earliest violation and the inspection or file review that led to the CCONPP/NPP. If both a file review and inspection were conducted we used the earlier date.
<i>File review or inspection to CCONPP/NPP (days)</i>	The time between the file review or inspection and issuing the CCONPP/NPP. If both a file review and inspection were conducted we used the earlier date.
<i>Earliest violation to CCONPP/NPP (days)</i>	The time between the earliest violation and issuing the CCONPP/NPP.

Attachment C: Informal Enforcement	
<i>AI No.</i>	LDEQ Agency Interest Number
<i>Facility Name</i>	Facility Name
<i>WL/NOV Tracking ID</i>	The tracking number as listed on the Warning Letter/Notice of Violation.
<i>Date of earliest violation identified</i>	Earliest violation listed in Warning Letter/NOV.
<i>WL/NOV Date</i>	Date of the Warning Letter/NOV.
<i>WL/NOV EDMS Doc Id</i>	The Warning Letter/NOV EDMS document ID
<i>Triggered by (Incident/Inspection)</i>	Whether the Warning Letter/NOV was triggered by an incident or an inspection.
<i>Earliest violation to WL/NOV (days)</i>	The time between the earliest violation and issuing the Warning Letter/NOV.