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Used Oil/Hazardous Waste Enforcement: Louisiana Department of Environmental Quality and New Orleans Armored Combat Vehicle Manufacturing Facility Enter into Settlement Agreement

09/18/2023

The Louisiana Department of Environmental Quality ("LDEQ") and Textron Inc. ("TI") entered into a Settlement Agreement ("Agreement") addressing alleged violations of the Louisiana Hazardous Waste Regulations. See Settlement Tracking No. SA-HE-23-0045.

The Agreement provides that TI is a corporation that owns and/or operated a ship, boat, and armored combat vehicle manufacturing facility ("Facility") in New Orleans, Louisiana.

TI denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

LDEQ is stated to have conducted an inspection of the TI Facility on March 28, 2022. The inspection's scope was described as determining the degree of compliance with the Louisiana Environmental Compliance Act and the Hazardous Waste Regulations.

The TI Facility is stated to have previously notified LDEQ as a large quantity generator of hazardous waste. However, a review of the Facility's hazardous waste manifests during the inspection is stated to have indicated that the Facility was operating as a small quantity generator of hazardous waste.

The following violations were allegedly identified:

- Failure to mark containers containing universal waste electronics with the words "Universal Waste – Electronics"
- Failure to determine the length of time that universal waste has been accumulated from the date it became a waste
- Failure to mark containers containing universal waste batteries with the words "Universal Waste – Batteries"
- Failure to mark or label containers holding hazardous waste at or near the point of generation where the waste initially accumulates with the words "Hazardous Waste"
- Failure to mark or label containers holding hazardous waste at or near the point of generation where the waste initially accumulates with an indication of the hazards of the contents

- Failure to clearly mark or label aboveground containers used to store used oil with the words “Used Oil”
- Failure to keep a container holding hazardous waste at or near the point of generation where the waste initially accumulates closed at all times, except when adding, removing, or consolidating waste
- Failure to determine if generated solid waste is a hazard

The Agreement assesses a penalty of \$5,000.

A copy of the Agreement can be downloaded [here](#).