Honeywell

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October 6, 2014

Dennis M. Abraham
U.S. Environmental Protection Agency
Region III (3RC10)
1650 Arch Street
Philadelphia, PA 19103

Kristen Hall
U.S. Environmental Protection Agency
Region III (3AP20)
1650 Arch Street
Philadelphia, PA 19103

Deputy Regional Director
Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060

Enforcement Division Director
Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23218

Re: DOJ No. 90-5-2-1-09611 – Enhanced LDAR Certification of Compliance

To Whom It May Concern:

Honeywell Resins & Chemicals LLC ("Honeywell") is making this submittal pursuant to the Consent Decree in United States of America and Commonwealth of Virginia v. Honeywell Resins &Chemicals LLC ("consent decree"), the reference for which is Civil Action Number: 3:13-cv-00193-REP, and DOJ Case Number: 90-5-2-1-09611.

Appendix A Paragraph 33 of the consent decree directs Honeywell to submit a certification of compliance within two hundred and forty days after receipt of the external LDAR Audit Report. In a separate letter being sent to EPA and DEQ today, Honeywell is submitting two potential violations of Appendix A of the consent decree identified through the internal LDAR QA/QC program. The certification below is based on having identified and begun corrective action on those two items.

Honeywell certifies to the best of its knowledge the following:

(i) The Honeywell Hopewell facility is in compliance with all applicable LDAR regulations and this ELP,
(ii) It has completed all corrective actions from the external LDAR audit, and
(iii) All equipment at the facility that is regulated under any federal, state, or local leak detection program has been identified and included in the facility's LDAR program.

If you have questions or need additional information, please contact me by phone or email.

Regards,

James F. Faulstich
HSE Program Manager

DOCUMENT CERTIFICATION

Facility Name: Honeywell Resins & Chemicals LLC

Facility Location: 905 East Randolph Road, Hopewell, VA 23860

Type of Submittal Attached: Enhanced LDAR Certification of Compliance

Certification: I certify under penalty of law that this document and all attachments 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. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official: *Fred Harry*

Title: *Site Manager*

Signature: James Perry for Fred Harry **Date:** October 6, 2014