

## SETTLEMENT AGREEMENT

Whereas, Oakville Community Action Group ("Oakville") and Louisiana Environmental Action Network ("LEAN") filed a Complaint on January 18, 2011 against Industrial Pipe, Inc. and Riverside Recycling & Disposal LLC in the United States District Court for the Eastern District of Louisiana, Civil Action No. 02-1258 (the "Lawsuit"), in which they allege violations by Riverside Recycling & Disposal LLC of the Resource Conservation and Recovery Act ("RCRA"), the Louisiana Environmental Quality Act ("LEQA") and regulations promulgated thereunder;

Whereas, Riverside Recycling & Disposal LLC denies that it has violated or is in violation of RCRA, LEQA or any other applicable law, rule, regulation or permit or are in any other way liable to Oakville or LEAN; and

Whereas, to avoid devoting further resources to litigation and to promote cooperative resolutions of disputes about landfill operations, the parties hereto wish to settle the Lawsuit without further litigation;

Now, therefore, in consideration of and for the reasons stated herein Oakville, LEAN and the Riverside Recycling & Disposal LLC agree as follows:

Riverside Recycling & Disposal LLC shall construct a six-foot high commercial grade chain-link fence along that section of the east to west perimeter of Riverside Recycling & Disposal LLC' facility as indicated by the red line on the aerial photograph attached hereto and made a part hereof as Exhibit A. The fence shall be constructed in the same shape and design as that indicated by the red line on Exhibit A. Said fence will be constructed by a

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licensed fence builder. Riverside Recycling & Disposal LLC shall start construction of the fence within fourteen (14) days of execution of this Settlement Agreement by both parties. Riverside Recycling & Disposal LLC will use all reasonable efforts to have the fence construction completed within fourteen (14) days from the start of construction.

Riverside Recycling & Disposal LLC shall allow representatives of LEAN and Oakville access to its facility to inspect the fence within fourteen (14) days after its completion. During the site visit, LEAN and Oakville's representatives will have an opportunity to confirm whether the fence has been constructed as specified in this Settlement Agreement. Promptly after execution of this Settlement Agreement by both parties, Oakville and LEAN shall file a voluntary dismissal of their claims against Riverside Recycling & Disposal LLC. Each party shall bear his or its own costs and attorney fees.

This agreement may be executed by the parties in multiple originals on the dates hereinafter noted.

Oakville Community Action Group

By: Allen F. Green Aug. 8, 2011  
Date

Allen Green President Oakville Community Action Group  
Print Name Title

Louisiana Environmental Action Network

By: Gene M. Orr 7/29/11  
Date

MARYLEE M. ORR Executive Director  
Print Name Title

Riverside Recycling & Disposal LLC

By: [Signature] 7/27/11  
Date

Av. Hoffer President  
Print Name Title



Exhibit A