

EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2006-1004-AIR-E **TCEQ ID:** RN100218288 **CASE NO.:** 30281
RESPONDENT NAME: Citation Corporation

ORDER TYPE:

<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> EMERGENCY ORDER	

CASE TYPE:

<input type="checkbox"/> AGRICULTURE	<input checked="" type="checkbox"/> AIR	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE	<input type="checkbox"/> MUNICIPAL SOLID WASTE
<input type="checkbox"/> OCCUPATIONAL CERTIFICATION	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> RADIOACTIVE WASTE
<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL	<input type="checkbox"/> USED OIL
<input type="checkbox"/> USED OIL FILTER	<input type="checkbox"/> WATER QUALITY		

SITE WHERE VIOLATION(S) OCCURRED: Texas Foundries, 1611 North Raguet Street, Lufkin, Angelina County

TYPE OF OPERATION: Iron foundry

SMALL BUSINESS: Yes No

OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.

INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.

COMMENTS RECEIVED: The *Texas Register* comment period expired on December 11, 2006. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney/SEP Coordinator: None

TCEQ Enforcement Coordinator: Ms. Sherronda Martin, Enforcement Division, Enforcement Section III, MC R-12, (713) 767-3680; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

TCEQ Field Investigator: Mr. James Mayfield, Beaumont Regional Office, MC R-10, (409) 898-3838

Respondent: Mr. Jim Fitzgerald, Registered Agent, Citation Corporation, 1412 West 5th Street, Plainview, Texas 79072
Mr. Robert Scoggins, Environmental Manager, 1611 North Raguet, Lufkin, Texas 75904

Respondent's Attorney: Not represented by counsel on this enforcement matter

RESPONDENT'S NAME: Citation Corporation
 DOCKET NO.: 2006-1004-AIR-E

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date of Complaint Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: April 7 through April 20, 2006</p> <p>Date of NOE Relating to this Case: June 19, 2006 (NOE)</p> <p>Background Facts: This was a routine record review investigation. One violation was documented.</p> <p>AIR</p> <p>Failed to submit Semi-annual Deviation Reports (SDRs) [30 TEX. ADMIN. CODE §§ 122.143(4), 122.145(2)(A) and (B) and TEX. HEALTH & SAFETY CODE § 382.085(b) and Federal Operating Permit O-01427].</p>	<p>Total Assessed: \$2,100</p> <p>Total Deferred: \$420 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$1,680</p> <p>Site Compliance History Classification: <input type="checkbox"/> High <input checked="" type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification: <input type="checkbox"/> High <input checked="" type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Major Source: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Corrective Actions Taken:</p> <p>The Executive Director recognizes that on May 1, 2006, Citation submitted the SDR for the period of August 20, 2004 to February 20, 2005.</p>

Penalty Calculation Worksheet (PCW)
 Policy Revision 2 (September 2002) PCW Revision May 19, 2005

DATES	Assigned 26-Jun-2006	Screening 07-Jul-2006	EPA Due 03-Apr-2007
	PCW 19-Jul-2006		

RESPONDENT/FACILITY INFORMATION			
Respondent	Citation Corporation		
Reg. Ent. Ref. No.	RN100218288		
Facility/Site Region	10-Beaumont	Major/Minor Source	Major Source

CASE INFORMATION			
Enf./Case ID No.	30281	No. of Violations	1
Docket No.	2006-1004-AIR-E	Order Type	1660
Media Program(s)	Air Quality	Enf. Coordinator	Sherronda Martin
Multi-Media		EC's Team	Enforcement Team 5
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) **Subtotal 1** \$2,500

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History 9% Enhancement **Subtotals 2, 3, & 7** \$225

Notes The penalty was enhanced by one NOV for the same or similar violation and two NOVs for other violations.

Culpability No 0% Enhancement **Subtotal 4** \$0

Notes The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply 25% Reduction **Subtotal 5** -\$625

	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	X	
N/A		<i>(mark with a small x)</i>

Notes The Respondent returned to compliance May 1, 2006.

Economic Benefit 0% Enhancement* **Subtotal 6** \$0

Total EB Amounts	\$19	<small>*Capped at the Total EB \$ Amount</small>
Approx. Cost of Compliance	\$500	

SUM OF SUBTOTALS 1-7 **Final Subtotal** \$2,100

OTHER FACTORS AS JUSTICE MAY REQUIRE **Adjustment** \$0

Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes

Final Penalty Amount \$2,100

STATUTORY LIMIT ADJUSTMENT **Final Assessed Penalty** \$2,100

DEFERRAL 20% Reduction **Adjustment** -\$420

Reduces the Final Assessed Penalty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes Deferral offered for expedited settlement.

PAYABLE PENALTY \$1,680

Screening Date 07-Jul-2006

Docket No. 2006-1004-AIR-E

PCW

Respondent Citation Corporation

Policy Revision 2 (September 2002)

Case ID No. 30281

PCW Revision May 19, 2005

Reg. Ent. Reference No. RN100218288

Media [Statute] Air Quality

Enf. Coordinator Sherronda Martin

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	1	5%
	Other written NOVs	2	4%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgements or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were</i>	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
<i>Please Enter Yes or No</i>			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 9%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

The penalty was enhanced by one NOV for the same or similar violation and two NOVs for other violations.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 9%

Screening Date	07-Jul-2006	Docket No.	2006-1004-AIR-E	PCW
Respondent	Citation Corporation	<i>Policy Revision 2 (September 2002)</i>		
Case ID No.	30281	<i>PCW Revision May 19, 2005</i>		
Reg. Ent. Reference No.	RN100218288			
Media [Statute]	Air Quality			
Enf. Coordinator	Sherronda Martin			
Violation Number	1			
Primary Rule Cite(s)	30 Tex. Admin. Code §§ 122.143(4), 122.145(2)(A), 122.145(2)(B) and Federal Operating Permit O-01427, Special Condition No. 7			
Secondary Rule Cite(s)	Tex. Health and Safety Code § 382.085(b)			
Violation Description	Failed to submit semi-annual deviation reports, as documented during an investigation conducted April 7, 2006. Specifically, Citation Corporation failed to certify the period of August 20, 2004 through December 31, 2004, which was required to be reported as a deviation in either a deviation report or the Annual Compliance Certification for the period January 1, 2005 through June 30, 2005. Failure to report the deviation in turn, required a submission of a subsequent semi-annual deviation report for the period of July 1, 2005 through December 31, 2005.			
Base Penalty	\$10,000			

>> **Environmental, Property and Human Health Matrix**

		Harm			
	Release	Major	Moderate	Minor	
OR	Actual	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Percent <input type="text"/>
	Potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Percent <input type="text" value="25%"/>

Matrix Notes

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

<i>mark only one use a small x</i>	daily	<input type="checkbox"/>
	monthly	<input type="checkbox"/>
	quarterly	<input type="checkbox"/>
	semiannual	<input type="checkbox"/>
	annual	<input type="checkbox"/>
	single event	<input checked="" type="checkbox"/>

Violation Base Penalty

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$19"/>	Violation Final Penalty Total <input type="text" value="\$2,100"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$2,100"/>	

Economic Benefit Worksheet

Respondent Citation Corporation
 Case ID No. 30281
 Reg. Ent. Reference No. RN100218288
 Media [Statute] Air Quality
 Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$500	30-Jul-2005	01-May-2006	0.8	\$19	n/a	\$19

Notes for DELAYED costs: Estimated cost to prepare and submit semi-annual deviation reports. Date required is based on the due date for the deviation reports. Final Date is the date the report was submitted.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

TOTAL

Compliance History

Customer/Respondent/Owner-Operator:	CN601541436 Citation Corporation	Classification: AVERAGE	Rating: 0.90
Regulated Entity:	RN100218288 TEXAS FOUNDRIES	Classification: AVERAGE	Site Rating: 0.90
ID Number(s):	AIR OPERATING PERMITS AIR OPERATING PERMITS	ACCOUNT NUMBER PERMIT	AC0019U 1427
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD008066946
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	31246
	STORMWATER	PERMIT	TXR05L404
	AIR NEW SOURCE PERMITS	PERMIT	8907
Location:	1611 N RAGUET ST, LUFKIN, TX, 75904	Rating Date: 9/1/2005 Repeat Violator: NO	
TCEQ Region:	REGION 10 - BEAUMONT		
Date Compliance History Prepared:	July 06, 2006		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	July 06, 2001 to July 06, 2006		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Sherronda Martin	Phone:	713-767-3680

Site Compliance History Components

- | | |
|----------------------------------------------------------------------------------------------|------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | N/A. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
- B. Any criminal convictions of the state of Texas and the federal government.
N/A
- C. Chronic excessive emissions events.
N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
- | | | |
|----|------------|----------|
| 1 | 04/10/2003 | (25224) |
| 2 | 06/19/2006 | (456713) |
| 3 | 02/14/2002 | (96301) |
| 4 | 09/04/2001 | (96300) |
| 5 | 08/26/2003 | (150460) |
| 6 | 04/15/2004 | (264033) |
| 7 | 11/22/2004 | (339599) |
| 8 | 03/19/2003 | (21832) |
| 9 | 08/05/2003 | (60721) |
| 10 | 04/04/2005 | (372425) |
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 04/10/2003 (25224)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter A 335.9(a)(1)(G)

Description: The facility failed to maintain a record on the location of the satellite accumulation area at the resin bin.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter A 335.4(1)
Description: Industrial solid waste was observed on the ground throughout the facility.

Date: 04/16/2004 (264033)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 106, SubChapter T 106.454(1)(F)
30 TAC Chapter 106, SubChapter T 106.454(3)(B)[G]
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to maintain the degreaser unit top covers in the closed position.

Date: 11/23/2004 (339599)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to report a deviation of Federal Operating Permit No. O-01427, Special Condition No. 4.

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CITATION CORPORATION
RN100218288**

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**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2006-1004-AIR-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Citation Corporation ("Citation") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and Citation appear before the Commission and together stipulate that:

1. Citation owns and operates an iron foundry at 1611 North Raguet Street in Lufkin, Angelina County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Commission and Citation agree that the Commission has jurisdiction to enter this Agreed Order, and that Citation is subject to the Commission's jurisdiction.
4. Citation received notice of the violations alleged in Section II ("Allegations") on or about June 24, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Citation of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Two Thousand One Hundred Dollars (\$2,100) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Citation has paid One Thousand Six Hundred Eighty Dollars (\$1,680) of the administrative penalty and Four Hundred Twenty Dollars (\$420) is deferred contingent upon Citation's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If Citation fails to timely and

satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Citation to pay all or part of the deferred penalty.

7. Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and Citation have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that on May 1, 2006, Citation submitted the Semi-annual Deviation Report for the period of August 20, 2004 to February 20, 2005.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Citation has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Plant, Citation is alleged to have failed to submit Semi-annual Deviation Reports, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4), 122.145(2)(A) and (B) and TEX. HEALTH & SAFETY CODE § 382.085(b) and Federal Operating Permit O-01427, Special Condition No. 7, as documented during an investigation beginning April 7, 2006 and ending April 20, 2006.

III. DENIALS

Citation generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Citation pay an administrative penalty as set forth in Section I, Paragraph 6 above. The imposition of this administrative penalty and Citation's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Citation Corporation, Docket No. 2006-1004-AIR-E" to:

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The provisions of this Agreed Order shall apply to and be binding upon Citation. Citation is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against Citation in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
4. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Citation, or three days after the date on which the Commission mails notice of the Order to Citation, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

2/26/07

Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact on my compliance history;
- Greater scrutiny of any permit applications submitted by me;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature

8/31/06

Date

ROBERT SCOGGINS

Name (Printed or typed)
Authorized Representative of
Citation Corporation

Environmental Mgr.

Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

8/18/18

Robert Lee

From the

Robert Lee