

Executive Summary – Enforcement Matter – Case No. 49606

Irion County

RN102166832

Docket No. 2014-1653-MSW-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

MSW

Small Business:

No

Location(s) Where Violation(s) Occurred:

Barnhart Landfill, located 0.75 miles southwest U.S. Highway 67 and Farm-to-Market Road 163 intersection, 1,000 feet South U.S. Highway 67, and 100 feet northwest at Santa Fe Railroad, Barnhart, Irion County

Type of Operation:

Type I municipal solid waste ("MSW") landfill

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: February 27, 2015

Comments Received: No

Penalty Information

Total Penalty Assessed: \$13,200

Amount Deferred for Expedited Settlement: \$2,640

Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$10,560

Total Due to General Revenue: \$0

Payment Plan: N/A

SEP Conditional Offset: \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

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Irion County
RN102166832
Docket No. 2014-1653-MSW-E

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: September 17, 2014

Date(s) of NOE(s): October 22, 2014

Violation Information

1. Caused, suffered, allowed, or permitted the collection and disposal of whole used or scrap tires at a MSW landfill, unless processed prior to disposal in a manner acceptable to the Executive Director (“ED”). Specifically, a whole scrap tire was observed in the far northeast side of the active cell at the Facility. [30 TEX. ADMIN. CODE § 330.15(e)(4) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.3].

2. Failed to maintain required plans or other related documents and make them available for review at the Facility or an alternate location approved by the ED. Specifically, all site inspection records, training procedures, cover logs, results from gas monitoring and any remediation records, current financial assurance documentation, and any and all documents, manifests, tickets, etc., involving special waste were not being maintained and kept at the location approved by the ED. [30 TEX. ADMIN. CODE §§ 330.125(a) and 330.165(h) and MSW Permit No. 1270, Facility Site Operating Plan, Sections IV.1.2. and IV.4.23]

3. Failed to control windblown waste and litter from the active working face of the landfill. Specifically, windblown litter was noted in the brush to the northeast, adjacent to the active working face of the landfill, and litter was accumulating along the eastern fence line. [30 TEX. ADMIN. CODE § 330.139(1) and (2) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.10].

4. Failed to design, construct, and maintain a run-on control system capable of preventing flow onto the active portion of the landfill during the peak discharge from at least a 25-year rainfall event. Specifically, an inadequate run-on control system was observed along the top of the eastern side of the Type I active face of the landfill. [30 TEX. ADMIN. CODE § 330.305(b)].

5. Failed to provide adequate daily cover. Specifically, an inadequate daily cover was observed on the Type I active face and throughout the active cell of the landfill and inadequate cover was observed in an inactive area at or above ground level on the west side of the active cell. [30 TEX. ADMIN. CODE § 330.165(a) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.23].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to:

a. Immediately:

i. Cease accepting unauthorized waste, including but not limited to waste tires, at the Facility;

ii. Begin applying daily cover to the working face of the landfill and intermediate cover to the inactive portion of the landfill in a manner in which no waste is exposed;

iii. Begin maintaining all Facility records, including but not limited to all site inspection records, training procedures, cover logs, results from gas monitoring and any remediation records, current financial assurance documentations, and any and all documents, manifests, tickets, etc., involving special waste and ensure they are located at the location approved by the ED and available for review by agency personnel; and

iv. Implement improvements to the Facility's processes and procedures and conduct employee training to ensure that windblown waste and litter is properly controlled.

b. Within 30 days:

i. Collect all windblown waste and litter throughout the Facility on a daily basis, including but not limited to the working face of the Type I landfill; and

ii. Remove all unauthorized waste and dispose of it at an authorized facility.

c. Within 60 days, implement a run-on control system for the active face of the landfill, capable of preventing flow onto the active face of the landfill during peak discharge from at least a 25-year rainfall event.

d. Within 75 days, submit written certification to demonstrate compliance with Ordering Provision a. through c.

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Docket No. 2014-1653-MSW-E

e. Within 180 days, apply final cover to the remaining areas of the landfill and implement the landfill closure and post closure requirements in accordance with the Site Development Plan.

f. Within 195 days, submit written certification to demonstrate compliance with Ordering Provision e.

Litigation Information

Date Petition(s) Filed: N/A

Date Answer(s) Filed: N/A

SOAH Referral Date: N/A

Hearing Date(s): N/A

Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Margarita Dennis, Enforcement Division, Enforcement Team 7, MC R-04, (817) 588-5892; Candy Garrett, Enforcement Division, MC 219, (512) 239-1456

TCEQ SEP Coordinator: N/A

Respondent: The Honorable Tom Aiken, County Judge, Irion County, P.O. Box 770, Mertzon, Texas 76941

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

TCEQ DATES	Assigned	27-Oct-2014	Screening	3-Nov-2014	EPA Due	
	PCW	5-Dec-2014				

RESPONDENT/FACILITY INFORMATION			
Respondent	Irion County		
Reg. Ent. Ref. No.	RN102166832		
Facility/Site Region	8-San Angelo	Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	49606	No. of Violations	5
Docket No.	2014-1653-MSW-E	Order Type	1660
Media Program(s)	Municipal Solid Waste	Government/Non-Profit	Yes
Multi-Media		Enf. Coordinator	Margarita Dennis
		EC's Team	Enforcement Team 7
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$12,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	10.0% Enhancement	Subtotals 2, 3, & 7	\$1,200
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Notes: Recommended enhancement for two NOV's with same or similar violations.

Culpability	No	0.0% Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$1,225
Estimated Cost of Compliance	\$15,648

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$13,200
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$13,200
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$13,200
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DEFERRAL	20.0% Reduction	Adjustment	-\$2,640
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$10,560
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Screening Date 3-Nov-2014

Docket No. 2014-1653-MSW-E

PCW

Respondent Irion County

Policy Revision 4 (April 2014)

Case ID No. 49606

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102166832

Media [Statute] Municipal Solid Waste

Enf. Coordinator Margarita Dennis

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	2	10%
	Other written NOVs	0	0%
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 judgments 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 (<i>number of events</i>)	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 submitted</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%

Please Enter Yes or No

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) 10%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Recommended enhancement for two NOVs with same or similar violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 10%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 10%

Screening Date 3-Nov-2014

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PCW

Respondent Irion County

Policy Revision 4 (April 2014)

Case ID No. 49606

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102166832

Media [Statute] Municipal Solid Waste

Enf. Coordinator Margarita Dennis

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 330.15(e)(4) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.3.

Violation Description The Respondent cause, suffered, allowed, or permitted the collection and disposal of whole used or scrap tires at a municipal solid waste ("MSW") landfill, unless processed prior to disposal in a manner acceptable to the Executive Director. Specifically, a whole scrap tire was observed in the far northeast side of the active cell at the Facility.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				3.0%
Potential			x	

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
				0.0%

Matrix Notes

Human health or the environment will or could be exposed to insignificant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$24,250

\$750

Violation Events

Number of Violation Events 1 Number of violation days 47

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	x

Violation Base Penalty \$750

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$750

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$6

Violation Final Penalty Total \$825

This violation Final Assessed Penalty (adjusted for limits) \$825

Economic Benefit Worksheet

Respondent Irion County
Case ID No. 49606
Reg. Ent. Reference No. RN102166832
Media Municipal Solid Waste
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
No commas or \$							

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$137	17-Sep-2014	24-Jul-2015	0.85	\$6	n/a	\$6
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs Estimated cost to remove and dispose of the scrap tire. Date required is the investigation date. Final date is the estimated date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance	\$137	TOTAL	\$6
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Screening Date 3-Nov-2014

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PCW

Respondent Irion County

Policy Revision 4 (April 2014)

Case ID No. 49606

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102166832

Media [Statute] Municipal Solid Waste

Enf. Coordinator Margarita Dennis

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code §§ 330.125(a) and 330.165(h) and MSW Permit No. 1270, Facility Site Operating Plan, Sections IV.1.2. and IV.4.23.

Violation Description

Failed to maintain required plans or other related documents and make them available for review at the Facility or an alternate location approved by the Executive Director. Specifically, all site inspection records, training procedures, cover logs, results from gas monitoring and any remediation records, current financial assurance documentation, and any and all documents, manifests, tickets, etc., involving special waste were not being maintained and kept at the location approved by the Executive Director.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
	x		

Percent 5.0%

Matrix Notes

100% of the rule requirement was not met.

Adjustment \$23,750

\$1,250

Violation Events

Number of Violation Events 1

47 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

mark only one with an x

Violation Base Penalty \$1,250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$1,250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$36

Violation Final Penalty Total \$1,375

This violation Final Assessed Penalty (adjusted for limits) \$1,375

Economic Benefit Worksheet

Respondent Irion County
Case ID No. 49606
Reg. Ent. Reference No. RN102166832
Media Municipal Solid Waste
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$500	19-Feb-2014	24-Jul-2015	1.42	\$36	n/a	\$36
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to maintain all site inspection records, training procedures, cover logs, results from gas monitoring and any remediation records, current financial assurance documentation, and any and all documents, manifests, tickets, etc., involving special waste onsite for review by agency personnel. The date required is the initial investigation date. Final date is the estimated date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$500

TOTAL \$36

Screening Date 3-Nov-2014

Docket No. 2014-1653-MSW-E

PCW

Respondent Irion County

Policy Revision 4 (April 2014)

Case ID No. 49606

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102166832

Media [Statute] Municipal Solid Waste

Enf. Coordinator Margarita Dennis

Violation Number 3

Rule Cite(s) 30 Tex. Admin. Code § 330.139(1) and (2) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.10

Violation Description

Failed to control windblown waste and litter from the active working face of the landfill. Specifically, windblown litter was noted in the brush to the northeast, adjacent to the active working face of the landfill, and litter was accumulating along the eastern fence line.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			x
Potential			

Percent 5.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$23,750

\$1,250

Violation Events

Number of Violation Events 1

47 Number of violation days

mark only one with an x

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$1,250

One quarterly event is recommended from the documentation of the violation during the September 17, 2014 investigation to the November 3, 2014 screening date.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$1,250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$107

Violation Final Penalty Total \$1,375

This violation Final Assessed Penalty (adjusted for limits) \$1,375

Economic Benefit Worksheet

Respondent Irion County
Case ID No. 49606
Req. Ent. Reference No. RN102166832
Media Municipal Solid Waste
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$1,000	19-Feb-2014	24-Jul-2015	1.42	\$71	n/a	\$71
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	19-Feb-2014	24-Jul-2015	1.42	\$36	n/a	\$36

Notes for DELAYED costs

Estimated cost to collect and remove windblown waste and litter and to implement improvements to the facility's process and procedures and conduct employee training to ensure that windblown waste and litter is properly controlled. Date required is the initial investigation date. Final date is the estimated date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance	\$1,500	TOTAL	\$107
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Screening Date 3-Nov-2014

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PCW

Respondent Irion County

Policy Revision 4 (April 2014)

Case ID No. 49606

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102166832

Media [Statute] Municipal Solid Waste

Enf. Coordinator Margarita Dennis

Violation Number 4

Rule Cite(s)

30 Tex. Admin. Code § 330.305(b)

Violation Description

Failed to design, construct, and maintain a run-on control system capable of preventing flow onto the active portion of the landfill during the peak discharge from at least a 25-year rainfall event. Specifically, an inadequate run-on control system was observed along the top of the eastern side of the Type I active face of the landfill.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential		x	

Percent 5.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$23,750

\$1,250

Violation Events

Number of Violation Events 1

47 Number of violation days

mark only one with an x

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$1,250

One quarterly event is recommended from the documentation of the violation during the September 17, 2014 investigation to the November 3, 2014 screening date.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDRP/Settlement Offer

Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$1,250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$399

Violation Final Penalty Total \$1,375

This violation Final Assessed Penalty (adjusted for limits) \$1,375

Economic Benefit Worksheet

Respondent Irion County
Case ID No. 49606
Reg. Ent. Reference No. RN102166832
Media Municipal Solid Waste
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$4,000	19-Feb-2014	24-Jul-2015	1.42	\$19	\$380	\$399
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to construct barriers for run-on and run-off control. Date Required is the initial investigation date. Final Date is the estimated date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$4,000

TOTAL

\$399

Screening Date 3-Nov-2014

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PCW

Respondent Irion County

Policy Revision 4 (April 2014)

Case ID No. 49606

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102166832

Media [Statute] Municipal Solid Waste

Enf. Coordinator Margarita Dennis

Violation Number 5

Rule Cite(s) 30 Tex. Admin. Code § 330.165(a) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.23.

Violation Description

Failed to provide adequate daily cover. Specifically, inadequate daily cover was observed on the Type I active face and throughout the active cell of the landfill and inadequate cover was observed in an inactive area at or above ground level on the west side of the active cell.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential	x		

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment will or could be exposed to significant amounts of pollutants that would exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 2

47 Number of violation days

mark only one with an x

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

Two monthly events are recommended from the documentation of the violation during the September 17, 2014 investigation to the November 3, 2014 screening date.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$7,500

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$677

Violation Final Penalty Total \$8,250

This violation Final Assessed Penalty (adjusted for limits) \$8,250

Economic Benefit Worksheet

Respondent Irion County
Case ID No. 49606
Reg. Ent. Reference No. RN102166832
Media Municipal Solid Waste
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$9,511	19-Feb-2014	24-Jul-2015	1.42	\$677	n/a	\$677

Notes for DELAYED costs

Estimated cost to provide adequate cover to the landfill. Date required is the initial investigation date.
Final date is the estimated date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$9,511

TOTAL

\$677

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

PUBLISHED Compliance History Report for CN600337778, RN102166832, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

Customer, Respondent, or Owner/Operator: CN600337778, Irion County **Classification:** SATISFACTORY **Rating:** 5.18

Regulated Entity: RN102166832, Barnhart Landfill **Classification:** SATISFACTORY **Rating:** 7.57

Complexity Points: 6 **Repeat Violator:** NO

CH Group: 11 - Waste Management (Excluding Landfills)

Location: .75 MILES SW US HIGHWAY 67 AND FM 163 INTERSECTION 1000 FEET S US HIGHWAY 67 100 FEET NW AT SANTA FE RAILROAD IN BARNHART TX, IRION COUNTY

TCEQ Region: REGION 08 - SAN ANGELO

ID Number(s):
AIR NEW SOURCE PERMITS ACCOUNT NUMBER IA0007F **MUNICIPAL SOLID WASTE DISPOSAL PERMIT** 1270

Compliance History Period: September 01, 2009 to August 31, 2014 **Rating Year:** 2014 **Rating Date:** 09/01/2014

Date Compliance History Report Prepared: December 04, 2014

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: November 03, 2009 to November 03, 2014

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.
Name: Margarita Dennis **Phone:** (817) 588-5892

Site and Owner/Operator History:

- 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/operator of the site during the compliance period? NO
- 3) If YES for #2, who is the current owner/operator? N/A
- 4) If YES for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If YES, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date:	04/05/2014 (1156252)	CN600337778
	Self Report?	NO	Classification: Moderate
	Citation:	30 TAC Chapter 330, SubChapter F 330.125(a)	

Site Operating Plan PERMIT

Description: Failure to maintain records at an authorized location.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 330, SubChapter D 330.137
 Site Operating Plan PERMIT

Description: Failure to provide all required information on the site sign.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 330, SubChapter D 330.139
 Site Operating Plan PERMIT

Description: Failure to control windblown waste and litter.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter G 330.305(b)

Description: Failure to provide adequate run-on controls on active faces.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter G 330.305(c)

Description: Failure to provide adequate run-off control on active face.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 330, SubChapter D 330.165(a)
 Site Operating Plan PERMIT

Description: Failure to provide adequate daily cover on active face.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter D 330.165(h)
 Site Operating Plan PERMIT

Description: Failure to provide complete daily cover logs.
 Self Report? NO Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.266(a)
 30 TAC Chapter 330, SubChapter A 330.15(a)
 30 TAC Chapter 330, SubChapter A 330.15(c)

Description: Failure to comply with the applicable rules regarding discharge of petroleum products.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter B 330.63(d)(4)(C)
 30 TAC Chapter 330, SubChapter D 330.121(a)
 Site Development Plan PERMIT
 Site Operating Plan PERMIT

Description: Failure to comply with the facility's Site Operating Plan

2 Date: 07/31/2014 (1184345) CN600337778

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter F 330.125(a)
 Site Operating Plan PERMIT

Description: Failure to maintain records at an authorized location.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 330, SubChapter D 330.139
 Site Operating Plan PERMIT

Description: Failure to control windblown waste and litter.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter G 330.305(b)

Description: Failure to provide adequate run-on controls on active faces.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter G 330.305(c)

Description: Failure to provide adequate run-off control on active face.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 330, SubChapter D 330.165(a)
 Site Operating Plan PERMIT

Description: Failure to provide adequate daily cover on active face.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter D 330.165(h)
 Site Operating Plan PERMIT

Description: Failure to provide complete daily cover logs.
 Self Report? NO Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.266(a)
 30 TAC Chapter 330, SubChapter A 330.15(a)
 30 TAC Chapter 330, SubChapter A 330.15(c)

Description: Failure to comply with the applicable rules regarding discharge of petroleum products.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 330, SubChapter B 330.63(d)(4)(C)
 30 TAC Chapter 330, SubChapter D 330.121(a)

Site Development Plan PERMIT

Site Operating Plan PERMIT

Description: Failure to comply with the facility's Site Operating Plan

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
IRION COUNTY
RN102166832**

**§ BEFORE THE
§ TEXAS COMMISSION ON
§ ENVIRONMENTAL QUALITY**

**AGREED ORDER
DOCKET NO. 2014-1653-MSW-E**

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Irion County ("Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a Type I municipal solid waste landfill at 0.75 mile southwest of the United States ("US") Highway 67 and Farm-to-Market Road 163 intersection, 1,000 feet South US Highway 6, and 100 feet northwest at Santa Fe Railroad in Barnhart, Irion County, Texas (the "Facility").
2. The Facility involves or involved the management of municipal solid waste ("MSW") as defined in TEX. HEALTH & SAFETY CODE ch. 361.
3. The Executive Director and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about October 27, 2014.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative penalty in the amount of Thirteen Thousand Two Hundred Dollars (\$13,200) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Ten Thousand Five Hundred Sixty Dollars (\$10,560) of the administrative penalty and Two Thousand Six Hundred Forty Dollars (\$2,640) is deferred contingent upon the Respondent'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 the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent 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 and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a).
9. 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 the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
10. 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.
11. 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 Facility, the Respondent is alleged to have:

1. Caused, suffered, allowed, or permitted the collection and disposal of whole used or scrap tires at a MSW landfill, unless processed prior to disposal in a manner acceptable to the Executive Director, in violation of 30 TEX. ADMIN. CODE § 330.15(e)(4) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.3., as documented during an investigation conducted on September 17, 2014. Specifically, a whole scrap tire was observed in the far northeast side of the active cell at the Facility.
2. Failed to maintain required plans or other related documents and make them available for review at the Facility or an alternate location approved by the Executive Director, in violation of 30 TEX. ADMIN. CODE §§ 330.125(a) and 330.165(h) and MSW Permit No. 1270, Facility Site Operating Plan, Sections IV.1.2. and IV.4.23., as documented during an investigation conducted on September 17, 2014. Specifically, all site inspection records, training procedures, cover logs, results from gas monitoring and any remediation records, current financial assurance documentation, and any and all

documents, manifests, tickets, etc., involving special waste were not being maintained and kept at the location approved by the Executive Director.

3. Failed to control windblown waste and litter from the active working face of the landfill, in violation of 30 TEX. ADMIN. CODE § 330.139(1) and (2) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.10., as documented during an investigation conducted on September 17, 2014. Specifically, windblown litter was noted in the brush to the northeast, adjacent to the active working face of the landfill, and litter was accumulating along the eastern fence line.
4. Failed to design, construct, and maintain a run-on control system capable of preventing flow onto the active portion of the landfill during the peak discharge from at least a 25-year rainfall event, in violation of 30 TEX. ADMIN. CODE § 330.305(b), as documented during an investigation conducted on September 17, 2014. Specifically, an inadequate run-on control system was observed along the top of the eastern side of the Type I active face of the landfill.
5. Failed to provide adequate daily cover, in violation of 30 TEX. ADMIN. CODE § 330.165(a) and MSW Permit No. 1270, Facility Site Operating Plan, Section IV.4.23., as documented during an investigation conducted on September 17, 2014. Specifically, an inadequate daily cover was observed on the Type I active face and throughout the active cell of the landfill and inadequate cover was observed in an inactive area at or above ground level on the west side of the active cell.

III. DENIALS

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

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent'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: Irion County, Docket No. 2014-1653-MSW-E" to:

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

2. It is further ordered that the Respondent shall undertake the following technical requirements:

- a. Immediately upon the effective date of this Agreed Order:
 - i. Cease accepting unauthorized waste, including but not limited to waste tires, at the Facility;
 - ii. Begin applying daily cover to the working face of the landfill and intermediate cover to the inactive portion of the landfill in a manner in which no waste is exposed, in accordance with 30 TEX. ADMIN. CODE § 330.165 and MSW Permit No. 1270;
 - iii. Begin maintaining all Facility records, including but not limited to all site inspection records, training procedures, cover logs, results from gas monitoring and any remediation records, current financial assurance documentations, and any and all documents, manifests, tickets, etc., involving special waste and ensure they are located at the location approved by the Executive Director and available for review by agency personnel, in accordance with 30 TEX. ADMIN. CODE § 330.125 and MSW Permit No. 1270; and
 - iv. Implement improvements to the Facility's processes and procedures and conduct employee training to ensure that windblown waste and litter is properly controlled, in accordance with 30 TEX. ADMIN. CODE § 330.139.
- b. Within 30 days after the effective date of this Agreed Order:
 - i. Collect all windblown waste and litter throughout the Facility on a daily basis, including but not limited to the working face of the Type I landfill, in accordance with 30 TEX. ADMIN. CODE § 330.139; and
 - ii. Remove all unauthorized waste and dispose of it at an authorized facility.
- c. Within 60 days after the effective date of this Agreed Order, implement a run-on control system for the active face of the landfill, capable of preventing flow onto the active face of the landfill during peak discharge from at least a 25-year rainfall event, in accordance with 30 TEX. ADMIN. CODE § 330.305 and MSW Permit No. 1270;
- d. Within 75 days after the effective date of this Agreed Order, submit written certification as described in Ordering Provision No. 2.f. and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a. through 2.c.;
- e. Within 180 days after the effective date of this Agreed Order, apply final cover to the remaining areas of the landfill and implement the landfill closure and post closure requirements in accordance with the Site Development Plan; and
- f. Within 195 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation

including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.e. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"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 fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Waste Section Manager
San Angelo Regional Office
Texas Commission on Environmental Quality
622 South Oakes, Suite K
San Angelo, Texas 76903-7035

3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director.

- The determination of what constitutes good cause rests solely with the Executive Director.
6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent 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.
 7. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
 8. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Raymond Maurice J
For the Executive Director

4/7/15
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 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 failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- 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;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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

Tom Aiken
Signature

January 30, 2015
Date

Tom Aiken
Name (Printed or typed)
Authorized Representative of
Irion County

County Judge
Title

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