

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 50760
Signal International Texas, L.P.
RN100214303
Docket No. 2015-0986-AIR-E

Order Type:

Default Order

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

91 West Front Street, Orange, Orange County

Type of Operation:

marine and fabrication plant

Other Significant Matters:

Additional Pending Enforcement Actions: None

Past-Due Penalties: None

Past-Due Fees: None

Other: Respondent filed a petition for bankruptcy relief pursuant to Chapter 11 of the United States Code ("U.S.C.") on July 12, 2015. So long as the automatic stay is in effect, the TCEQ will not seek to execute upon any monetary judgment without first approaching the Bankruptcy Court where Respondent's bankruptcy case is pending.

Interested Third-Parties: None

Texas Register Publication Date: February 12, 2016

Comments Received: None

Penalty Information

Total Penalty Assessed: \$2,813

Total Paid to General Revenue: \$0

Total Due to General Revenue: \$2,813

Compliance History Classifications:

Person/CN – Satisfactory

Site/RN – High

Major Source: Yes

Statutory Limit Adjustment: None

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A
Date(s) of Investigation: June 9, 2015
Date(s) of NOV(s): N/A
Date(s) of NOE(s): June 26, 2015

Violation Information

Failed to submit a Permit Compliance Certification ("PCC") no later than 30 days after the end of the certification period [TEX. HEALTH & SAFETY CODE § 382.085(b); 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.146(2); and Federal Operating Permit No. O2397, General Terms and Conditions and Special Terms and Conditions No. 11].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

On April 30, 2015, submitted the PCC for the March 23, 2014 through October 7, 2014 certification period.

Technical Requirements:

None

Litigation Information

Date Petition(s) Filed: October 27, 2015 (EDPRP); November 17, 2015 (EDFARP)
Date Green Card(s) Signed: October 29, 2015 (EDPRP); November 19, 2015 (EDFARP)
Date Answer(s) Filed: N/A

Contact Information

TCEQ Attorneys: Jess Robinson, Litigation Division, (512) 239-3400
Lena Roberts, Litigation Division, (512) 239-3400
Rudy Calderon, Public Interest Counsel, (512) 239-6363

TCEQ Enforcement Coordinator: Jennifer Nguyen, Enforcement Division, (512) 239-6160

TCEQ Regional Contact: Sarah Kirksey, Beaumont Regional Office, (409) 898-3838

Respondent Contact: Richard Marler, President, Signal International Texas GP, LLC, General Partner, Signal International Texas, L.P., 350 North Saint Paul Street, Dallas, Texas 75201;
Pat Killeen, Corporate Director - Environmental Health & Safety, Signal International Texas, L.P., 601 Bayou Casotte Parkway, Pascagoula, Mississippi 39581

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

TCEQ

DATES	Assigned	29-Jun-2015	Screening	30-Jun-2015	EPA Due	
	PCW	21-Sep-2015				

RESPONDENT/FACILITY INFORMATION

Respondent	Signal International Texas, L.P.				
Reg. Ent. Ref. No.	RN100214303				
Facility/Site Region	10-Beaumont	Major/Minor Source	Major		

CASE INFORMATION

Enf./Case ID No.	50760	No. of Violations	1
Docket No.	2015-0986-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Jennifer Nguyen
		EC's Team	Enforcement Team 5
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$3,750
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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	0.0% Enhancement	Subtotals 2, 3, & 7	\$0
Notes	No adjustment for compliance history.		
Culpability	No 0.0% Enhancement	Subtotal 4	\$0
Notes	The Respondent does not meet the culpability criteria.		
Good Faith Effort to Comply Total Adjustments		Subtotal 5	-\$937
Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
Total EB Amounts	\$6	*Capped at the Total EB \$ Amount	
Estimated Cost of Compliance	\$250		

SUM OF SUBTOTALS 1-7	Final Subtotal	\$2,813
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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	\$2,813
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STATUTORY LIMIT ADJUSTMENT		Final Assessed Penalty	\$2,813
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DEFERRAL	0.0% Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes	Deferral not offered for non-expedited settlement.		
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PAYABLE PENALTY		\$2,813
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Screening Date 30-Jun-2015

Docket No. 2015-0986-AIR-E

PCW

Respondent Signal International Texas, L.P.

Policy Revision 4 (April 2014)

Case ID No. 50760

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100214303

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

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>)	0	0%
	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%
<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) 0%

>> **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

No adjustment for compliance history.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 0%

>> **Final Compliance History Adjustment**

Final Adjustment Percentage *capped at 100% 0%

Screening Date 30-Jun-2015 **Docket No.** 2015-0986-AIR-E **PCW**
Respondent Signal International Texas, L.P. *Policy Revision 4 (April 2014)*
Case ID No. 50760 *PCW Revision March 26, 2014*
Reg. Ent. Reference No. RN100214303
Media [Statute] Air
Enf. Coordinator Jennifer Nguyen

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 122.143(4) and 122.146(2), Tex. Health & Safety Code § 382.085(b), and Federal Operating Permit No. O2397, General Terms and Conditions and Special Terms and Conditions No. 11

Violation Description Failed to submit a Permit Compliance Certification ("PCC") no later than 30 days after the end of the certification period. Specifically, the PCC for the March 23, 2014 through October 7, 2014 certification period was due by November 6, 2014, but was not submitted until April 30, 2015.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				0.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
		x			15.0%

Matrix Notes

100% of the rule requirement was not met.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1 175 Number of violation days

<i>mark only one with an x</i>	daily	
	weekly	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	x

Violation Base Penalty \$3,750

One single event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$937

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

Notes The Respondent completed corrective measures on April 30, 2015, before the June 26, 2015 Notice of Enforcement.

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$6

Violation Final Penalty Total \$2,813

This violation Final Assessed Penalty (adjusted for limits) \$2,813

Economic Benefit Worksheet

Respondent Signal International Texas, L.P.
Case ID No. 50760
Reg. Ent. Reference No. RN100214303
Media Air
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				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$250	6-Nov-2014	30-Apr-2015	0.48	\$6	n/a	\$6

Notes for DELAYED costs
 Estimated cost to submit the PCC for the March 23, 2014 through October 7, 2014 certification period. The Date Required is the date the PCC was due and the Final Date is the 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 \$250

TOTAL \$6

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 CN601554686, RN100214303, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

Customer, Respondent, or Owner/Operator: CN601554686, Signal International Texas, L.P. **Classification:** SATISFACTORY **Rating:** 0.56

Regulated Entity: RN100214303, Westport Orange Shipyard **Classification:** HIGH **Rating:** 0.00

Complexity Points: 13 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 91 W FRONT ST ORANGE, TX 77630-5847, ORANGE COUNTY

TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER OC0376V

INDUSTRIAL AND HAZARDOUS WASTE EPA ID

TXD008079949

POLLUTION PREVENTION PLANNING ID NUMBER P03452

AIR NEW SOURCE PERMITS ACCOUNT NUMBER OC0376V

AIR NEW SOURCE PERMITS REGISTRATION 71868

AIR NEW SOURCE PERMITS PERMIT 49079

AIR NEW SOURCE PERMITS REGISTRATION 130367

AIR EMISSIONS INVENTORY ACCOUNT NUMBER OC0376V

AIR OPERATING PERMITS PERMIT 2397

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE

REGISTRATION # (SWR) 23492

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 3556

AIR NEW SOURCE PERMITS AFS NUM 4836100058

AIR NEW SOURCE PERMITS REGISTRATION 112536

STORMWATER PERMIT TXR05CK24

WASTEWATER EPA ID TX0136042

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

Date Compliance History Report Prepared: June 29, 2015

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: June 29, 2010 to June 29, 2015

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Jennifer Nguyen

Phone: (512) 239-6160

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.

N/A

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

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
SIGNAL INTERNATIONAL
TEXAS, L.P.;
RN100214303**

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§
§
§
§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

DEFAULT ORDER

DOCKET NO. 2015-0986-AIR-E

On _____, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered the Executive Director's First Amended Report and Petition, filed pursuant to TEX. WATER CODE ch. 7, TEX. HEALTH & SAFETY CODE ch. 382, and the rules of the TCEQ, which requests appropriate relief, including the imposition of an administrative penalty. The respondent made the subject of this Order is Signal International Texas, L.P. ("Respondent").

The Commission makes the following Findings of Fact and Conclusions of Law:

FINDINGS OF FACT

1. Respondent owns and operates a marine and fabrication plant located at 91 West Front Street in Orange, Orange County, Texas (the "Plant"). The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. During a record review conducted on June 9, 2015, an investigator documented that Respondent failed to submit a Permit Compliance Certification ("PCC") no later than 30 days after the end of the certification period. Specifically, the PCC for the March 23, 2014 through October 7, 2014 certification period was due by November 6, 2014, but was not submitted until April 30, 2015.
3. The Executive Director recognizes that on April 30, 2015, Respondent submitted the PCC for the March 23, 2014 through October 7, 2014 certification period.
4. The Executive Director filed the "Executive Director's First Amended Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against Signal International Texas, L.P." (the "EDFARP") in the TCEQ Chief Clerk's office on November 17, 2015.
5. By letter dated November 17, 2015, sent to Respondent's last known address via certified mail, return receipt requested, postage prepaid, the Executive Director served Respondent with notice of the EDFARP. According to the return receipt "green card," Respondent received notice of the EDFARP on November 19, 2015, as evidenced by the signature on the card.
6. More than 20 days have elapsed since Respondent received notice of the EDFARP. Respondent failed to file an answer and failed to request a hearing.
7. On or about July 12, 2015, Respondent filed a petition for bankruptcy relief pursuant to Chapter 11 of the United States Code ("U.S.C.").

CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2, Respondent failed to submit a PCC no later than 30 days after the end of the certification period, in violation of TEX. HEALTH & SAFETY CODE § 382.085(b), 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.146(2), and Federal Operating Permit No. O2397, General Terms and Conditions and Special Terms and Conditions No. 11.
3. As evidenced by Findings of Fact Nos. 4 and 5, the Executive Director timely served Respondent with proper notice of the EDFARP, as required by TEX. WATER CODE § 7.055 and 30 TEX. ADMIN. CODE § 70.104(b)(1).
4. As evidenced by Finding of Fact No. 6, Respondent failed to file a timely answer as required by TEX. WATER CODE § 7.056 and 30 TEX. ADMIN. CODE § 70.105. Pursuant to TEX. WATER CODE § 7.057 and 30 TEX. ADMIN. CODE § 70.106, the Commission may enter a Default Order against Respondent and assess the penalty recommended by the Executive Director.
5. As evidenced by Findings of Fact No. 7, on or about July 12, 2015, Respondent filed a petition for bankruptcy relief pursuant to U.S.C. Chapter 11. The automatic stay imposed by the Bankruptcy Code (specifically, 11 U.S.C. § 362(a)) does not apply to the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power, by virtue of the exception set out at 11 U.S.C. § 362(b)(4). Accordingly, TCEQ, a governmental unit as defined under 11 U.S.C. § 101(27), is expressly excepted from the automatic stay in pursuing enforcement of the State's environmental protection laws, and in seeking to liquidate its damages for such violations. However, so long as the automatic stay is in effect in Respondent's bankruptcy proceedings, the TCEQ will not seek to execute upon any monetary judgment obtained without first approaching the United States Bankruptcy Court where Respondent's bankruptcy case is pending as necessary.
6. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against Respondent for violations of state statutes within TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
7. An administrative penalty in the amount of two thousand eight hundred thirteen dollars (\$2,813.00) is assessed by the Commission and is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053.
8. TEX. WATER CODE §§ 5.102 and 7.002 authorize the Commission to issue orders and make determinations necessary to effectuate the purposes of the statutes within its jurisdiction.

ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. Respondent is assessed an administrative penalty in the amount of two thousand eight hundred thirteen dollars (\$2,813.00) for violations of state statutes and rules of the TCEQ. The assessment of this penalty and Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations which are not raised here.

2. All checks submitted to pay the penalty assessed by this Order may be made out to TCEQ and sent with the notation "Re: Signal International Texas, L.P.; Docket No. 2015-0986-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Texas Commission on Environmental Quality
Attention: Cashier's Office, MC 214
P.O. Box 13088
Austin, Texas 78711-3088
3. All relief not expressly granted in this Order is denied.
4. The provisions of this Order shall apply to and be binding upon Respondent.
5. If Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Respondent's failure to comply is not a violation of this Order. Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Respondent shall notify the Executive Director within seven days after Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
6. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to Respondent if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
8. The Chief Clerk shall provide a copy of this fully executed Order to each of the parties. By law, the effective date of this Order shall be the date the Order is final, as provided by 30 TEX. ADMIN. CODE § 70.106(d) and TEX. GOV'T CODE § 2001.144.

S I G N A T U R E P A G E

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

AFFIDAVIT OF COLLEEN LENAHAN

STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

"My name is Colleen Lenahan. I am of sound mind, capable of making this affidavit, and the facts stated in this affidavit are within my personal knowledge and are true and correct.

On behalf of the Executive Director of the Texas Commission on Environmental Quality, the "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against Signal International Texas, L.P." (the "EDPRP") was filed in the TCEQ Chief Clerk's office on October 27, 2015.

The EDPRP was mailed to Respondent's last known address on October 27, 2015, via certified mail, return receipt requested, postage prepaid. According to the return receipt "green card," Respondent received notice of the EDPRP on October 29, 2015, as evidenced by the signature on the card.

On behalf of the Executive Director of the Texas Commission on Environmental Quality, the "Executive Director's First Amended Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against Signal International Texas, L.P." (the "EDFARP") was filed in the TCEQ Chief Clerk's office on November 17, 2015.

The EDFARP was mailed to Respondent's last known address on November 17, 2015, via certified mail, return receipt requested, postage prepaid. According to the return receipt "green card," Respondent received notice of the EDFARP on November 19, 2015, as evidenced by the signature on the card.

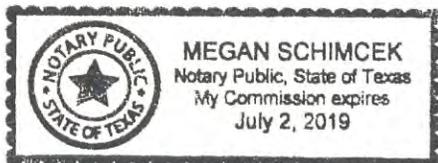
More than 20 days have elapsed since Respondent received notice of the EDFARP. Respondent failed to file an answer and failed to request a hearing."

Colleen Lenahan
Colleen Lenahan, Staff Attorney
Office of Legal Services, Litigation Division
Texas Commission on Environmental Quality

Before me, the undersigned authority, on this day personally appeared Colleen Lenahan, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that she executed the same for the purposes and consideration herein expressed.

Subscribed and sworn to before me on this 22nd day of December, A.D. 2015.

Megan Schimceck
Notary Public, State of Texas



Notary Without Bond