

Executive Summary – Enforcement Matter – Case No. 59134
GB Biosciences LLC
RN100238492
Docket No. 2020-0463-IWD-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

WQ

Small Business:

No

Location(s) Where Violation(s) Occurred:

Greens Bayou Plant, 2239 Haden Road in Houston, Harris County

Type of Operation:

Pesticides and agriculture chemical production plant

Other Significant Matters:

Additional Pending Enforcement Actions: Yes, Docket No. 2020-1042-AIR-E

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: January 8, 2021

Comments Received: No

Penalty Information

Total Penalty Assessed: \$37,057

Amount Deferred for Expedited Settlement: \$7,411

Total Paid to General Revenue: \$29,646

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: January 29, 2020

Date(s) of NOE(s): March 4, 2020

Executive Summary – Enforcement Matter – Case No. 59134
GB Biosciences LLC
RN100238492
Docket No. 2020-0463-IWD-E

Violation Information

Failed to comply with permitted effluent limitations for cyanide, *Enterococci*, and biochemical oxygen demand (5-day) [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000749000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001 and 101].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to, within 130 days, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000749000, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations to demonstrate compliance.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Katelyn Tubbs, Enforcement Division, Enforcement Team 3, MC 219, (512) 239-2512; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Kevin Duhe, President, GB Biosciences LLC, 410 Swing Road, Greensboro, North Carolina 27409
Melinda McWilliams, Site Manager, GB Biosciences LLC, 2239 Haden Road, Houston, Texas 77015

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

TCEQ
DATES

Assigned 9-Mar-2020

PCW 2-Apr-2020

Screening 23-Mar-2020

EPA Due 5-Dec-2019

RESPONDENT/FACILITY INFORMATION

Respondent GB Biosciences LLC
Reg. Ent. Ref. No. RN100238492
Facility/Site Region 12-Houston Major/Minor Source Major

CASE INFORMATION

Enf./Case ID No. 59134 No. of Violations 4
Docket No. 2020-0463-IWD-E Order Type 1660
Media Program(s) Water Quality Government/Non-Profit No
Multi-Media EC's Team Katelyn Tubbs
Enforcement Team 3
Admin. Penalty \$ Limit Minimum \$0 Maximum \$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)

Subtotal 1 \$20,250

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History 83.0% Adjustment Subtotals 2, 3, & 7 \$16,807

Notes Enhancement for six months of self-reported effluent violations, four NOV's with dissimilar violations, one Order containing a denial of liability, and one Order without a denial of liability.

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 \$0

Economic Benefit 0.0% Enhancement* Subtotal 6 \$0

Total EB Amounts \$1,683
Estimated Cost of Compliance \$15,000
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7

Final Subtotal \$37,057

OTHER FACTORS AS JUSTICE MAY REQUIRE

0.0%

Adjustment \$0

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount \$37,057

STATUTORY LIMIT ADJUSTMENT

Final Assessed Penalty \$37,057

DEFERRAL

20.0%

Reduction Adjustment -\$7,411

Reduces the Final Assessed Penalty by the indicated percentage.

Notes

Deferral offered for expedited settlement.

PAYABLE PENALTY

\$29,646

Screening Date 23-Mar-2020

Docket No. 2020-0463-IWD-E

PCW

Respondent GB Biosciences LLC

Policy Revision 4 (April 2014)

Case ID No. 59134

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100238492

Media Water Quality

Enf. Coordinator Katelyn Tubbs

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	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>)	6	30%
	Other written NOVs	4	8%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	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	1	25%
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%
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) 83%

>> 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

Enhancement for six months of self-reported effluent violations, four NOVs with dissimilar violations, one Order containing a denial of liability, and one Order without a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 83%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 83%

Screening Date 23-Mar-2020
Respondent GB Biosciences LLC
Case ID No. 59134

Docket No. 2020-0463-IWD-E

PCW

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100238492

Media Water Quality

Enf. Coordinator Katelyn Tubbs

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000749000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001

Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			x
Potential			

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

A simplified model was used to evaluate cyanide to determine whether the discharged amounts of pollutants exceeded protective levels. 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 \$21,250

\$3,750

Violation Events

Number of Violation Events 1

62 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$3,750

One quarterly event is recommended for the quarter containing the months of May and July 2019, for Outfall 001.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes

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

Violation Subtotal \$3,750

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$1,683

Violation Final Penalty Total \$6,863

This violation Final Assessed Penalty (adjusted for limits) \$6,863

Economic Benefit Worksheet

Respondent GB Biosciences LLC
Case ID No. 59134
Reg. Ent. Reference No. RN100238492
Media Water Quality
Violation No. 1

Percent Interest 5.0
Years of Depreciation 15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$15,000	28-Feb-2019	27-May-2021	2.24	\$1,683	n/a	\$1,683

Notes for DELAYED costs

Estimated Other cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations. The Date Required is the end date of the first month of noncompliance and the Final Date is the estimated date of compliance.

Avoided Costs

ANNUALIZE 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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$15,000

TOTAL

\$1,683

Screening Date 23-Mar-2020
Respondent GB Biosciences LLC
Case ID No. 59134
Reg. Ent. Reference No. RN100238492
Media Water Quality
Enf. Coordinator Katelyn Tubbs

Docket No. 2020-0463-IWD-E

PCW

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Violation Number

2

Rule Cite(s)

30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000749000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 101

Violation Description

Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			x

Percent 7.0%

>> 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 \$23,250

\$1,750

Violation Events

Number of Violation Events 3

91 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$5,250

Three single events are recommended for the monitoring periods ending in April, June, and July of 2019, for Outfall No. 101.

Good Faith Efforts to Comply

0.0%

Reduction \$0

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

Extraordinary		
Ordinary		
N/A	x	

Notes

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

Violation Subtotal \$5,250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$9,608

This violation Final Assessed Penalty (adjusted for limits) \$9,608

Economic Benefit Worksheet

Respondent GB Biosciences LLC
Case ID No. 59134
Reg. Ent. Reference No. RN100238492
Media Water Quality
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit No. 1.

Avoided Costs

ANNUALIZE 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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date 23-Mar-2020
Respondent GB Biosciences LLC
Case ID No. 59134
Reg. Ent. Reference No. RN100238492
Media Water Quality
Enf. Coordinator Katelyn Tubbs
Violation Number 3

Docket No. 2020-0463-IWD-E

PCW

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Rule Cite(s)

30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000749000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 101

Violation Description

Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential	x		

Percent 30.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

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

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events 1

31 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

One monthly event is recommended for the month of May 2019, for Outfall No. 101.

Good Faith Efforts to Comply

0.0%

Reduction \$0

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

Extraordinary		
Ordinary		
N/A	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 \$0

Violation Final Penalty Total \$13,725

This violation Final Assessed Penalty (adjusted for limits) \$13,725

Economic Benefit Worksheet

Respondent GB Biosciences LLC
Case ID No. 59134
Reg. Ent. Reference No. RN100238492
Media Water Quality
Violation No. 3

Percent Interest 5.0
Years of Depreciation 15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit No. 1.

Avoided Costs

ANNUALIZE 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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0

Screening Date 23-Mar-2020
Respondent GB Biosciences LLC
Case ID No. 59134
Reg. Ent. Reference No. RN100238492
Media Water Quality
Enf. Coordinator Katelyn Tubbs
Violation Number 4

Docket No. 2020-0463-IWD-E

PCW

Policy Revision 4 (April 2014)
PCW Revision March 26, 2014

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000749000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 101

Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Potential		x		

>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	Percent
					0.0%
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					\$21,250

\$3,750

Violation Events

Number of Violation Events 1 28 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$3,750

One quarterly event is recommended for the quarter containing the month of February 2019, for Outfall No. 101.

Good Faith Efforts to Comply

0.0%

Reduction \$0

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

Extraordinary	
Ordinary	
N/A	x

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

Violation Subtotal \$3,750

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$6,863

This violation Final Assessed Penalty (adjusted for limits) \$6,863

Economic Benefit Worksheet

Respondent GB Biosciences LLC
Case ID No. 59134
Reg. Ent. Reference No. RN100238492
Media Water Quality
Violation No. 4

Percent Interest 5.0
Years of Depreciation 15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit No. 1.

Avoided Costs

ANNUALIZE 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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0

GB Biosciences LLC
Docket No. 2020-0463-IWD-E
TPDES Permit No. WQ0000749000
Case No. 59134

Effluent Violation Table

	Outfall No. 001	Outfall No. 101		
	Cyanide Daily Maximum Concentration	BOD5 Daily Maximum Loading	<i>Enterococci</i> Daily Average Concentration	<i>Enterococci</i> Daily Maximum Concentration
Monitoring Period	Limit = 0.019 mg/L	Limit = 500 lbs/day	Limit = 35 CFU/100 mL	Limit = 104 CFU/100 mL
February 2019	c	600	c	c
April 2019	c	c	35.8	287
May 2019	0.02	c	55.6	4,840
June 2019	c	c	c	135
July 2019	0.021	c	c	114

c = compliant BOD5 = Biochemical Oxygen Demand (5-day)
 lbs/day = pounds per day mg/L = milligrams per liter
 CFU/100 mL = colony forming units per 100 milliliters

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



Compliance History Report

Compliance History Report for CN600132831, RN100238492, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator:	CN600132831, GB Biosciences LLC	Classification:	SATISFACTORY	Rating:	3.65
Regulated Entity:	RN100238492, GB BIOSCIENCES GREENS BAYOU PLANT	Classification:	SATISFACTORY	Rating:	3.65
Complexity Points:	30	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	2239 Haden Road in Houston, Harris County, Texas				
TCEQ Region:	REGION 12 - HOUSTON				

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER HG0195U

AIR OPERATING PERMITS PERMIT 2265

AIR OPERATING PERMITS PERMIT 2267

WASTEWATER EPA ID TX0007439

INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD000836486

AIR NEW SOURCE PERMITS PERMIT 234B

AIR NEW SOURCE PERMITS AFS NUM 4820100178

AIR NEW SOURCE PERMITS PERMIT 3475A

AIR NEW SOURCE PERMITS REGISTRATION 10998

AIR NEW SOURCE PERMITS REGISTRATION 11974

AIR NEW SOURCE PERMITS REGISTRATION 31043

AIR NEW SOURCE PERMITS REGISTRATION 56638

AIR NEW SOURCE PERMITS REGISTRATION 76529

AIR NEW SOURCE PERMITS REGISTRATION 76871

AIR NEW SOURCE PERMITS REGISTRATION 79764

AIR NEW SOURCE PERMITS REGISTRATION 111428

AIR NEW SOURCE PERMITS REGISTRATION 154209

AIR NEW SOURCE PERMITS REGISTRATION 160060

IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30552

POLLUTION PREVENTION PLANNING ID NUMBER P00347

AIR OPERATING PERMITS PERMIT 2264

AIR OPERATING PERMITS PERMIT 2266

WASTEWATER PERMIT WQ0000749000

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50205

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30552

AIR NEW SOURCE PERMITS ACCOUNT NUMBER HG0195U

AIR NEW SOURCE PERMITS PERMIT 329A

AIR NEW SOURCE PERMITS PERMIT 4893A

AIR NEW SOURCE PERMITS REGISTRATION 10999

AIR NEW SOURCE PERMITS PERMIT 19694

AIR NEW SOURCE PERMITS REGISTRATION 32348

AIR NEW SOURCE PERMITS REGISTRATION 74243

AIR NEW SOURCE PERMITS REGISTRATION 76929

AIR NEW SOURCE PERMITS REGISTRATION 78869

AIR NEW SOURCE PERMITS REGISTRATION 111429

AIR NEW SOURCE PERMITS REGISTRATION 111430

AIR NEW SOURCE PERMITS REGISTRATION 149236

AIR NEW SOURCE PERMITS REGISTRATION 155841

AIR EMISSIONS INVENTORY ACCOUNT NUMBER HG0195U

TIRES REGISTRATION 6172

Compliance History Period: September 01, 2015 to August 31, 2020 **Rating Year:** 2020 **Rating Date:** 09/01/2020

Date Compliance History Report Prepared: September 10, 2020

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: September 10, 2015 to September 10, 2020

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

Name: Katelyn Tubbs

Phone: (512) 239-2512

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 |

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

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

- | | | | |
|---|----------------------------|----------------------------|---------------------------------------|
| 1 | Effective Date: 05/17/2016 | ADMINORDER 2015-1553-AIR-E | (1660 Order-Agreed Order With Denial) |
| | Classification: Moderate | | |

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(2)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Term and Condition 11 OP

Description: Failed to submit a permit compliance certification within 30 days after the end of the certification period.

2 Effective Date: 03/29/2019 ADMINORDER 2018-0439-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Terms & Conditions 2 OP

Description: Failed to create the final records for non-reportable emissions events no later than two weeks after the end of the emissions events.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	September 24, 2015	(1290297)	Item 24	November 17, 2017	(1461483)
Item 2	October 12, 2015	(1296500)	Item 25	January 25, 2018	(1467863)
Item 3	November 11, 2015	(1301953)	Item 26	April 12, 2018	(1493708)
Item 4	December 14, 2015	(1308881)	Item 27	April 26, 2018	(1471432)
Item 5	January 18, 2016	(1315665)	Item 28	May 23, 2018	(1500626)
Item 6	February 25, 2016	(1325057)	Item 29	June 18, 2018	(1507743)
Item 7	April 12, 2016	(1338949)	Item 30	July 24, 2018	(1514061)
Item 8	May 18, 2016	(1296146)	Item 31	August 22, 2018	(1520123)
Item 9	May 20, 2016	(1345749)	Item 32	September 21, 2018	(1527287)
Item 10	June 20, 2016	(1352192)	Item 33	October 23, 2018	(1533645)
Item 11	July 18, 2016	(1344886)	Item 34	December 13, 2018	(1545264)
Item 12	July 22, 2016	(1359165)	Item 35	January 15, 2019	(1532054)
Item 13	August 25, 2016	(1365589)	Item 36	January 18, 2019	(1559767)
Item 14	September 20, 2016	(1372290)	Item 37	February 18, 2019	(1559765)
Item 15	October 12, 2016	(1378467)	Item 38	April 17, 2019	(1571861)
Item 16	December 15, 2016	(1384427)	Item 39	May 20, 2019	(1569345)
Item 17	January 25, 2017	(1397180)	Item 40	June 10, 2019	(1575097)
Item 18	March 21, 2017	(1411164)	Item 41	August 02, 2019	(1581235)
Item 19	April 18, 2017	(1417667)	Item 42	September 23, 2019	(1606425)
Item 20	June 20, 2017	(1431259)	Item 43	October 21, 2019	(1613271)
Item 21	July 28, 2017	(1424044)	Item 44	November 20, 2019	(1619085)
Item 22	September 22, 2017	(1450183)	Item 45	December 17, 2019	(1626437)
Item 23	October 18, 2017	(1456003)	Item 46	July 29, 2020	(1597681)

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: 11/26/2019 (1592192)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 11 PERMIT
Special Terms and Conditions 6 and 8 OP

Description: Failure to perform the annual calibrations of pressure differential gauges for three baghouses (Emissions Point Numbers (EPNs): GBM027, GBM001, and GBM029) (Category C1).

- 2 Date: 12/31/2019 (1634078)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter
- 3 Date: 01/03/2020 (1592196)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.345(f)(6)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Term and Condition 1A OP
 Description: Failure to maintain complete records of run time meter readings for six (6) emergency diesel engines and fire pumps (Category B3).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 13D PERMIT
 Special Term and Condition 10 OP
 Description: Failure to record pressure drop readings across the Abrasive Blasting Baghouse Stack (EPN: GBU061) (Category B3).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 6 PERMIT
 Special Term and Condition 10 OP
 Description: Failure to maintain monthly average of mixed liquor suspended solids (MLSS) concentration at required minimum level of not less than 2000 milligrams per liter (mg/L) for EPN: GBW074 (Category C4).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 11 PERMIT
 Special Term and Condition 12 OP
 Description: Failure to continuously monitor the volatile organic compounds (VOC) concentrations from the Carbon Adsorption Vent (EPN: GBW067) (Category B1).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 General Terms and Conditions OP
 Description: Failure to report all instances of deviations for the reporting period of August 27, 2018 through February 26, 2019 (Category C3).
- 4 Date: 01/31/2020 (1640697)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter
- 5 Date: 02/06/2020 (1592347)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 9 OP
 Description: Failure to conduct daily ammonia (NH3) visual audible, and/olfactory (AVO) Inspections for IPN unit. (Category C4)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 9 OP
 Description: Failure to conduct weekly VOC AVO Inspections for IPN unit, (Category C1)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP

Description: Failure to document the run time for the emergency cooling water tower pump (Unit ID PP-GA414) and emergency generator (Unit ID PC-GE401). (Category C4)

Self Report? NO Classification: Moderate

Citation: 5C THSC Chapter 382 382.085(b)

Description: Failure to equip an open-ended valve or line (OEL) with a cap, blind flange, plug, or a second valve. (Category C10)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 2F OP

Description: Failure to complete final release reports within two weeks after the release (Category B3)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to conduct annual preventative maintenance for Unit ID PP-GA414. (Category B1)

6

Date: 02/28/2020 (1617649)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 2F OP

Description: Failure to create a final report in 14 days. (Category C3 violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 1 PERMIT
Special Term and Condition 9 OP

Description: Failure to prevent exceedance of carbon monoxide rate for the incinerator (EPN GBB001). (Category C7 violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 14G PERMIT
Special Term and Condition 9 OP

Description: Failure to maintain valid data above 95 percent of incinerator (EPN GBB001) operating time. (Category B3 violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT DDDDD 63.7515(d)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT DDDDD 63.7540(a)(10)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 1A OP

Description: Failure to conduct tune up on CTL II East Boiler (Unit ID U2-H0132) (Category B1 violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 18 PERMIT
Special Term and Condition 9 OP

Description: Failure to maintain the hourly firing rate for the CTL I HTF heater (Unit ID H0315/ EPN GBB005). (Category C4 violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.345(f)(6)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 1A OP

Description: Failure to record the purpose of operation for the east emergency generator (Unit ID F3-E5592). (Category C3 violation)

7

Date: 02/29/2020 (1647217)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

	Description:	Failure to meet the limit for one or more permit parameter		
8	Date:	03/31/2020	(1653553)	
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
9	Date:	04/30/2020	(1660140)	
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
10	Date:	05/31/2020	(1666644)	
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		

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
GB BIOSCIENCES LLC
RN100238492**

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

AGREED ORDER DOCKET NO. 2020-0463-IWD-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 GB Biosciences LLC (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a pesticides and agriculture chemical production plant located at 2239 Haden Road in Houston, Harris County, Texas (the "Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. WATER CODE ch. 26 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$37,057 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$29,646 of the penalty and \$7,411 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
5. 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). 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.

6. 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 Order.
7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. 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.

II. ALLEGATIONS

During a record review conducted on January 29, 2020, an investigator documented that the Respondent failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000749000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001 and 101, as shown in the effluent violation table below.

	Outfall No. 001	Outfall No. 101		
	Cyanide Daily Maximum Concentration	BOD ₅ Daily Maximum Loading	<i>Enterococci</i> Daily Average Concentration	<i>Enterococci</i> Daily Maximum Concentration
Monitoring Period	Limit = 0.019 mg/L	Limit = 500 lbs/day	Limit = 35 CFU/100 mL	Limit = 104 CFU/100 mL
February 2019	c	600	c	c
April 2019	c	c	35.8	287
May 2019	0.02	c	55.6	4,840
June 2019	c	c	c	135
July 2019	0.021	c	c	114

c = compliant BOD₅ = Biochemical Oxygen Demand (5-day)
lbs/day = pounds per day mg/L = milligrams per liter
CFU/100 mL = colony forming units per 100 milliliters

III. DENIALS

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

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this 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. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: GB Biosciences LLC, Docket No. 2020-0463-IWD-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. The Respondent shall, within 130 days after the effective date of this Order, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000749000, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is 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:

Water Section Manager
Houston Regional Office
Texas Commission on Environmental Quality
5425 Polk Street, Suite H
Houston, Texas 77023-1452

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
5. If the 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, the Respondent's failure to comply is not a violation of this 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.
6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this 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. Extension requests shall be sent to the Order Compliance Team at the address listed above.
7. This 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 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.
8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this 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 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,

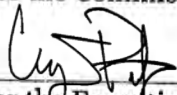
the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



Date

07/07/2021

For the Executive Director

Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, 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.

Melinda McGWilliams
Signature

4.21.2021
Date

Melinda McGWilliams
Name (Printed or typed)
Authorized Representative of
GB Biosciences LLC

Site Manager
Title

☐ If mailing address has changed, please check this box and provide the new address below:

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