

Executive Summary – Enforcement Matter – Case No. 59899
Renda Environmental, Inc. and Trinity River Authority of Texas
RN110859709, RN110859691, and RN110859683
Docket No. 2020-1278-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Macon Bodle Application Site DCTB2, located approximately 0.45 mile south of the intersection of East Belt Line Road and Sunrise Road, Dallas County (RN110859709, "Site 1")

Ray Lynn Campbell Application Site DCRL3, located approximately 0.85 mile east of the intersection of South Lancaster Hutchins Road and East Belt Line Road, Dallas County, Texas, (RN110859691,"Site 2")

Macon Bodle Application Site DCTB4, located approximately 1.63 miles east of the intersection of South Lancaster Hutchins Road and East Belt Line Road, Dallas County, Texas (RN110859683, "Site 3")

Type of Operation:

Wastewater treatment plant and biosolid land application site

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: October 29, 2021

Comments Received: No

Penalty Information

Total Penalty Assessed: \$19,688

Amount Deferred for Expedited Settlement: \$3,937

Total Paid to General Revenue: \$15,751

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Unclassified

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Executive Summary – Enforcement Matter – Case No. 59899
Renda Environmental, Inc. and Trinity River Authority of Texas
RN110859709, RN110859691, and RN110859683
Docket No. 2020-1278-AIR-E

Investigation Information

Complaint Date(s): August 28, 2019, September 4, 2019, September 6, 2019, September 12, 2019, September 17, 2019, and September 30, 2019

Complaint Information: The complainants alleged that odors from the land application of biosolids were causing an odor nuisance.

Date(s) of Investigation: August 31, 2020

Date(s) of NOE(s): September 8, 2020

Violation Information

1. Failed to prevent nuisance odor conditions. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on September 13, 2019 and September 18, 2019, detected very light to moderate and offensive manure odors on September 13, 2019, and detected very light to moderate and offensive manure odors on September 18, 2019 that resulted in the documentation of nuisance odor conditions at Site 1 [30 TEX. ADMIN. CODE § 101.4 and TEX. HEALTH & SAFETY CODE § 382.085(a) and (b)].

2. Failed to prevent nuisance odor conditions. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019 and September 5, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fish undertones on August 30, 2019; detected moderate and offensive fishy odors on September 5, 2019; and detected light to moderate and offensive manure odors on September 5, 2019 that resulted in the documentation of nuisance odor conditions at Site 2 [30 TEX. ADMIN. CODE § 101.4 and TEX. HEALTH & SAFETY CODE § 382.085(a) and (b)].

3. Failed to prevent nuisance odor conditions. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019, September 5, 2019, and September 13, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fishy undertones on August 30, 2019; detected moderate to strong and offensive manure odors on September 5, 2019; and detected moderate and offensive manure odors on September 13, 2019 that resulted in the documentation of nuisance odor conditions at Site 3 [30 TEX. ADMIN. CODE § 101.4 and TEX. HEALTH & SAFETY CODE § 382.085(a) and (b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

Executive Summary – Enforcement Matter – Case No. 59899
Renda Environmental, Inc. and Trinity River Authority of Texas
RN110859709, RN110859691, and RN110859683
Docket No. 2020-1278-AIR-E

The Respondents implemented the following corrective measures:

- a. By September 16, 2019, ceased all biosolids land application operations; and
- b. By October 1, 2019, Trinity River Authority of Texas began applying chlorine dioxide to all material prior to Renda Environmental, Inc. receiving the biosolids and taking the biosolids to the land application site.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Abigail Lindsey, Enforcement Division, Enforcement Team 5, MC 219, (512) 239-2576; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Ben Davis, Environmental Program Manager, Renda Environmental, Inc., 522 Benson Lane, Roanoke, Texas 76262-6397

Corey Wells, Manager, Renda Environmental, Inc., 522 Benson Lane, Roanoke, Texas 76262-6397

Patricia M. Cleveland, Executive Manager of Northern Region, Trinity River Authority of Texas, 6500 West Singleton Boulevard, Dallas, Texas 75212

Respondent's Attorney: N/A

Environmental Quality (TCEQ), Dallas/Fort Worth (DFW) Region Office to create a new violation track number (VTN) 751961 for association to the correct regulated entity. A complaint investigation No. 1592161, was conducted on August 30, September 5, 13, and 18, 2019, resulting in one violation, VTN 730869 for failure to prevent nuisance odor conditions at the Lancaster Area Biosolid Application Sites (RN110859717), including the following fields; the Ray Lynn Campbell Application Site DCRL3 (RN110859691), Macon Bodle Application Site DCTB4 (RN110859683), and Macon Bodle Application Site DCTB2 (RN110859709). A Notice of Enforcement (NOE) letter was sent to Renda Environmental, Inc (CN600418578) and Trinity River Authority of Texas (CN601265945) on February 13, 2020. However, the Lancaster Area Biosolid Application Sites was not the correct regulated entity and nuisance odors conditions were documented at each site. Therefore, with this file review, VTN 751961 is being associated to the Macon Bodle Application Site DCTB2 to document the alleged nuisance odor condition. Specifically, TCEQ staff conducted off-site odor surveys at the complainants sites or equal distance on September 13, 2019 and September 18, 2019; detected very light to moderate and offensive manure odors on September 13, 2019; and detected very light to moderate and offensive manure odors on September 18, 2019 that resulted in the documentation of nuisance odor conditions at the DCTB2 Site. A NOE letter will be mailed to Renda Environmental, Inc and Trinity River Authority of Texas.

NOE Date: 9/8/2020

**OUTSTANDING ALLEGED VIOLATION(S)
ASSOCIATED TO A NOTICE OF ENFORCEMENT**

Track Number: 751961

Compliance Due Date: To Be Determined

Violation Start Date: 9/13/2019

30 TAC Chapter 101.4

5C THSC Chapter 382.085(b)

Alleged Violation:

Investigation: 1656951

Comment Date: 09/03/2020

Failure to prevent the discharge of odor from the Macon Bodle Application Site DCTB2 in such concentrations and of such duration as to interfere with the normal enjoyment and use of property. Specifically, TCEQ staff conducted off-site odor surveys at the complainants sites or equal distance on September 13, 2019 and September 18, 2019; detected very light to moderate and offensive manure odors on September 13, 2019; and detected very light to moderate and offensive manure odors on September 18, 2019 that results in the documentation of nuisance odor conditions at the DCTB2 Site.

Recommended Corrective Action: Submit a written plan and/or documentation necessary to address the outstanding alleged violation to prevent recurrence of a same or similar violation.

Signed

Jessica Sprague
Environmental Investigator

Date

9/8/2020

Signed

Jawt Wessel
Supervisor

Date

09-08-2020

Attachments: (in order of final report submittal)

Enforcement Action Request (EAR)

Letter to Facility (specify type) : NOE

Investigation Report

Sample Analysis Results

Manifests

Notice of Registration

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) :

Environmental Quality (TCEQ), Dallas/Fort Worth (DFW) Region Office to create a new violation track number (VTN) 751921 for association to the correct regulated entity. A complaint investigation No. 1592161, was conducted on August 30, September 5, 13, and 18, 2019, resulting in one violation, VTN 730869 for failure to prevent nuisance odor conditions at the Lancaster Area Biosolid Application Sites (RN110859717), including the following fields; the Ray Lynn Campbell Application Site DCRL3 (RN110859691), Macon Bodle Application Site DCTB4 (RN110859683), and Macon Bodle Application Site DCTB2 (RN110859709). A Notice of Enforcement (NOE) letter was sent to Renda Environmental, Inc (CN600418578) and Trinity River Authority of Texas (CN601265945) on February 13, 2020 (VTN 730869). However, the Lancaster Area Biosolid Application Sites was not the correct regulated entity and nuisance odors conditions were documented at each site. Therefore, with this file review, VTN 751921 is being associated to the Ray Lynn Campbell Application Site DCRL3 (RN110859691) to document the alleged nuisance odor condition. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019 and September 5, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure with fish undertones on August 30, 2019; detected moderate and offensive fishy odors on August 30, 2019; and detected light to moderate and offensive manure odors on September 5, 2019 that resulted in the documentation of nuisance odors conditions at the DCRL3 Site. A NOE letter will be mailed to Renda Environmental, Inc and Trinity River Authority of Texas.

NOE Date: 9/8/2020

**OUTSTANDING ALLEGED VIOLATION(S)
ASSOCIATED TO A NOTICE OF ENFORCEMENT**

Track Number: 751921

Compliance Due Date: To Be Determined

Violation Start Date: 8/30/2019

30 TAC Chapter 101.4

5C THSC Chapter 382.085(b)

Alleged Violation:

Investigation: 1656936

Comment Date: 09/07/2020

Failure to prevent the discharge of odor from the Ray Lynn Campbell Application Site DCRL3 in such concentrations and of such duration as to interfere with the normal enjoyment and use of property. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019 and September 5, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure with fish undertones on August 30, 2018; detected moderate and offensive fishy odors on August 30, 2019; and detected light to moderate and offensive manure odors on September 5, 2019.

Recommended Corrective Action: Submit a written plan and/or documentation necessary to address the outstanding alleged violation to prevent recurrence of a same or similar violation.

AIR CP_110859683_CP_20200831_Investigation_1656956_
Texas Commission on Environmental Quality
Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

Customer: Renda Environmental, Inc.
Customer Number: CN600418578

Regulated Entity Name: MACON BODLE APPLICATION SITE DCTB4

Regulated Entity Number: RN110859683

Investigation # 1656956	Incident Numbers
Investigator: JESSICA SPRAGUE	Site Classification
Conducted: 08/31/2020 -- 08/31/2020	SIC Code: 4953
Program(s): AIR QUALITY NON PERMITTED	
Investigation Type: Data Maintenance File Review	Location: EAST 1.63 MI OF THE INTX OF S LANCASTER HUTCHINS RD & E BELT LINE RD, LOCATED TO THE SOUTH & NORTH
Additional ID(s): R04110859683	
Address: , ,	Local Unit: REGION 04 - DFW METROPLEX
	Activity Type(s): AIRFIIH - AIR AIRFIIH - INHOUSE FOLLOW UP INV

Principal(s):

Role	Name
RESPONDENT	RENDA ENVIRONMENTAL INC
RESPONDENT	TRINITY RIVER AUTHORITY OF TEXAS

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	ENVIRONMENTAL SERVICES COORDINATOR	MR STEVEN DANIELS	Work (972) 975-4450
REGULATED ENTITY CONTACT	ENVIRONMENTAL PROGRAMS MANAGER	MR BEN DAVIS	Cell (817) 825-1494 Work (817) 571-9391 x. 224

Other Staff Member(s):

Role	Name
QA Reviewer	CLINT BURNETT
Supervisor	JARET WESSEL

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR GENERIC INVESTIGATION (10 ITEMS)	AV

Investigation Comments:

This data maintenance file review was conducted by Ms. Jessica Sprague of the Texas Commission on

Environmental Quality (TCEQ), Dallas/Fort Worth (DFW) Region Office to create a new violation track number (VTN) 751959 for association to the correct regulated entity. A complaint investigation No. 1592161, was conducted on August 30, September 5, 13, and 18, 2019, resulting in one violation, VTN 730869 for failure to prevent nuisance odor conditions at the Lancaster Area Biosolid Application Sites (RN110859717), including the following fields; the Ray Lynn Campbell Application Site DCRL3 (RN110859691), Macon Bodle Application Site DCTB4 (RN110859683), and Macon Bodle Application Site DCTB2 (RN110859709). A Notice of Enforcement (NOE) letter was sent to Renda Environmental, Inc (CN600418578) and Trinity River Authority of Texas (CN601265945) on February 13, 2020. However, the Lancaster Area Biosolid Application Sites was not the correct regulated entity and nuisance odors conditions were documented at each site. Therefore, with this file review, VTN 751959 is being associated to the Macon Bodle Application Site DCTB4 to document the alleged nuisance odor condition. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019, September 5, 2019, and September 13, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fishy undertones on August 30, 2019; detected moderate to strong and offensive manure odors on September 5, 2019; detected moderate and offensive manure odors on September 13, 2019 that resulted in the documentation of nuisance odor conditions at the DCTB4 site. A NOE letter will be mailed to Renda Environmental, Inc and Trinity River Authority of Texas.

NOE Date: 9/8/2020

**OUTSTANDING ALLEGED VIOLATION(S)
ASSOCIATED TO A NOTICE OF ENFORCEMENT**

Track Number: 751959

Compliance Due Date: To Be Determined

Violation Start Date: 8/30/2019

30 TAC Chapter 101.4

5C THSC Chapter 382.085(b)

Alleged Violation:

Investigation: 1656956

Comment Date: 09/07/2020

Failure to prevent the discharge of odor from the Macon Bodle Application Site DCTB4 in such concentrations and of such duration as to interfere with the normal enjoyment and use of property. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019, September 5, 2019, and September 13, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fishy undertones on August 30, 2019; detected moderate to strong and offensive manure odors on September 5, 2019; detected moderate and offensive manure odors on September 13, 2019 that resulted in the documentation of nuisance odor conditions at the DCTB4 site.

Recommended Corrective Action: Submit a written plan and/or documentation necessary to address the outstanding alleged violation to prevent recurrence of a same or similar violation.



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned	15-Sep-2020			
	PCW	15-Sep-2021	Screening	22-Sep-2020	EPA Due

RESPONDENT/FACILITY INFORMATION

Respondent	Renda Environmental, Inc. and Trinity River Authority of Texas (Site 1)				
Reg. Ent. Ref. No.	RN110859709				
Facility/Site Region	4-Dallas/Fort Worth	Major/Minor Source	Minor		

CASE INFORMATION

Enf./Case ID No.	59899	No. of Violations	1
Docket No.	2020-1278-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	Yes
Multi-Media		Enf. Coordinator	Abigail Lindsey
		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	\$7,500
---	-------------------	---------

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% Adjustment	Subtotals 2, 3, & 7	\$0
---------------------------	-----------------	--------------------------------	-----

Notes	No adjustments due to compliance history.
-------	---

Culpability	No	0.0% Enhancement	Subtotal 4	\$0
--------------------	----	------------------	-------------------	-----

Notes	The Respondents do not meet the culpability criteria.
-------	---

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$1,875
--	-------------------	----------

Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
-------------------------	-------------------	-------------------	-----

Total EB Amounts	\$49	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$20,000	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$5,625
-----------------------------	-----------------------	---------

OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
---	------	-------------------	-----

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes	
-------	--

Final Penalty Amount	\$5,625
-----------------------------	---------

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$5,625
-----------------------------------	-------------------------------	---------

DEFERRAL	20.0%	Reduction	Adjustment	-\$1,125
-----------------	-------	-----------	-------------------	----------

Reduces the Final Assessed Penalty by the indicated percentage.

Notes	Deferral offered for expedited settlement.
-------	--

PAYABLE PENALTY	\$4,500
------------------------	---------

Screening Date 22-Sep-2020

Docket No. 2020-1278-AIR-E

PCW

Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 1)

Policy Revision 4 (April 2014)

Case ID No. 59899

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN110859709

Media Air

Enf. Coordinator Abigail Lindsey

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>)	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%
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 adjustments due to 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 22-Sep-2020 **Docket No.** 2020-1278-AIR-E **PCW**
Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 1) *Policy Revision 4 (April 2014)*
Case ID No. 59899 *PCW Revision March 26, 2014*
Reg. Ent. Reference No. RN110859709
Media Air
Enf. Coordinator Abigail Lindsey

Violation Number 1
Rule Cite(s) 30 Tex. Admin. Code § 101.4 and Tex. Health & Safety Code § 382.085(a) and (b)
Violation Description Failed to prevent nuisance odor conditions. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on September 13, 2019 and September 18, 2019, detected very light to moderate and offensive manure odors on September 13, 2019, and detected very light to moderate and offensive manure odors on September 18, 2019 that resulted in the documentation of nuisance odor conditions.
Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual		x		15.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes Human health or the environment has been exposed to significant amounts of pollutants as a result of the violation.

Adjustment \$21,250
 \$3,750

Violation Events

Number of Violation Events 2 2 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$7,500

Two single events are recommended (one event for each day an odor was detected that contributed to the documented nuisance odor conditions).

Good Faith Efforts to Comply 25.0% Reduction \$1,875

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer
 Extraordinary
 Ordinary
 N/A
Notes The Respondents achieved compliance on October 1, 2019, prior to the Notice of Enforcement dated September 8, 2020.

Violation Subtotal \$5,625

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$49 **Violation Final Penalty Total** \$5,625
This violation Final Assessed Penalty (adjusted for limits) \$5,625

Economic Benefit Worksheet

Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 1)
Case ID No. 59899
Reg. Ent. Reference No. RN110859709
Media Air
Violation No. 1

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)	\$20,000	13-Sep-2019	1-Oct-2019	0.05	\$49	n/a	\$49

Notes for DELAYED costs

Estimated cost to cease all biosolids land application operations at Site 1 and for Trinity River Authority of Texas to begin applying chlorine dioxide to all material prior to Renda Environmental, Inc. receiving the biosolids and taking the biosolids to the land application site. The Date Required is the first date an odor was detected and the Final Date is the 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 \$20,000

TOTAL \$49



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned PCW	15-Sep-2020	Screening	22-Sep-2020	EPA Due	
--------------	---------------------	-------------	------------------	-------------	----------------	--

RESPONDENT/FACILITY INFORMATION	
Respondent	Renda Environmental, Inc. and Trinity River Authority of Texas (Site 2)
Reg. Ent. Ref. No.	RN110859691
Facility/Site Region	4-Dallas/Fort Worth
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	59899	No. of Violations	1
Docket No.	2020-1278-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	Yes
Multi-Media		Enf. Coordinator	Abigail Lindsey
		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	\$7,500
---	-------------------	---------

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%	Adjustment	Subtotals 2, 3, & 7	\$0
Notes	No adjustments due to compliance history.			

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
Notes	The Respondents do not meet the culpability criteria.				

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$1,875
--	-------------------	----------

Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
Total EB Amounts	\$88	*Capped at the Total EB \$ Amount		
Estimated Cost of Compliance	\$20,000			

SUM OF SUBTOTALS 1-7	Final Subtotal	\$5,625
-----------------------------	-----------------------	---------

OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
Reduces or enhances the Final Subtotal by the indicated percentage.			
Notes			
	Final Penalty Amount	\$5,625	

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$5,625
-----------------------------------	-------------------------------	---------

DEFERRAL	20.0%	Reduction	Adjustment	-\$1,125
Reduces the Final Assessed Penalty by the indicated percentage.				
Notes	Deferral offered for expedited settlement.			

PAYABLE PENALTY	\$4,500
------------------------	---------

Screening Date 22-Sep-2020

Docket No. 2020-1278-AIR-E

PCW

Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site

Policy Revision 4 (April 2014)

Case ID No. 59899

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN110859691

Media Air

Enf. Coordinator Abigail Lindsey

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>)	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%
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 adjustments due to 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 22-Sep-2020

Docket No. 2020-1278-AIR-E

PCW

Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 2)

Policy Revision 4 (April 2014)

Case ID No. 59899

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN110859691

Media Air

Enf. Coordinator Abigail Lindsey

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 101.4 and Tex. Health & Safety Code § 382.085(a) and (b)

Violation Description Failed to prevent nuisance odor conditions. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019 and September 5, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fish undertones on August 30, 2019; detected moderate and offensive fishy odors on September 5, 2019; and detected light to moderate and offensive manure odors on September 5, 2019 that resulted in the documentation of nuisance odor conditions.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
		Actual	x		
Potential					

>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	Percent

Human health or the environment has been exposed to significant amounts of pollutants as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 2 Number of violation days 2

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$7,500

Two single events are recommended (one event for each day an odor was detected that contributed to the documented nuisance odor conditions).

Good Faith Efforts to Comply

25.0%

Reduction \$1,875

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

The Respondents achieved compliance on October 1, 2019, prior to the Notice of Enforcement dated September 8, 2020.

Violation Subtotal \$5,625

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$88

Violation Final Penalty Total \$5,625

This violation Final Assessed Penalty (adjusted for limits) \$5,625

Economic Benefit Worksheet

Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 2)
Case ID No. 59899
Reg. Ent. Reference No. RN110859691
Media Air
Violation No. 1

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)	\$20,000	30-Aug-2019	1-Oct-2019	0.09	\$88	n/a	\$88

Notes for DELAYED costs

Estimated cost to cease all biosolids land application operations at Site 2 and for Trinity River Authority of Texas to begin applying chlorine dioxide to all material prior to Renda Environmental, Inc. receiving the biosolids and taking the biosolids to the land application site. The Date Required is the first date an odor was detected and the Final Date is the 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

\$20,000

TOTAL

\$88



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned	15-Sep-2020	Screening	22-Sep-2020	EPA Due	
	PCW	9-Jul-2021				

RESPONDENT/FACILITY INFORMATION

Respondent	Renda Environmental, Inc. and Trinity River Authority of Texas (Site 3)				
Reg. Ent. Ref. No.	RN110859683				
Facility/Site Region	4-Dallas/Fort Worth	Major/Minor Source	Minor		

CASE INFORMATION

Enf./Case ID No.	59899	No. of Violations	1	
Docket No.	2020-1278-AIR-E	Order Type	1660	
Media Program(s)	Air	Government/Non-Profit	Yes	
Multi-Media		Enf. Coordinator	Abigail Lindsey	
		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	\$11,250
---	-------------------	----------

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%	Adjustment	Subtotals 2, 3, & 7	\$0
---------------------------	------	------------	--------------------------------	-----

Notes: No adjustments due to compliance history.

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
--------------------	----	------	-------------	-------------------	-----

Notes: The Respondents do not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$2,812
--	-------------------	----------

Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
-------------------------	------	--------------	-------------------	-----

Total EB Amounts: \$88
Estimated Cost of Compliance: \$20,000
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$8,438
-----------------------------	-----------------------	---------

OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	Subtotal 7	\$0
---	------	------------	-------------------	-----

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$8,438
-----------------------------	---------

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$8,438
-----------------------------------	-------------------------------	---------

DEFERRAL	20.0%	Reduction	Adjustment	-\$1,687
-----------------	-------	-----------	-------------------	----------

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY	\$6,751
------------------------	---------

Screening Date 22-Sep-2020

Docket No. 2020-1278-AIR-E

PCW

Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 3)

Policy Revision 4 (April 2014)

Case ID No. 59899

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN110859683

Media Air

Enf. Coordinator Abigail Lindsey

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>)	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%
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 adjustments due to 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 22-Sep-2020 **Docket No.** 2020-1278-AIR-E
Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 3)
Case ID No. 59899
Reg. Ent. Reference No. RN110859683
Media Air
Enf. Coordinator Abigail Lindsey

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

Violation Number

Rule Cite(s) 30 Tex. Admin. Code § 101.4 and Tex. Health & Safety Code § 382.085(a) and (b)

Violation Description Failed to prevent nuisance odor conditions. Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019, September 5, 2019, and September 13, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fishy undertones on August 30, 2019; detected moderate to strong and offensive manure odors on September 5, 2019; and detected moderate and offensive manure odors on September 13, 2019 that resulted in the documentation of nuisance odor conditions.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text" value="15.0%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0.0%"/>

Matrix Notes Human health or the environment has been exposed to significant amounts of pollutants as a result of the violation.

Adjustment

Violation Events

Number of Violation Events Number of violation days

daily	<input type="text"/>
weekly	<input type="text"/>
monthly	<input type="text"/>
quarterly	<input type="text"/>
semiannual	<input type="text"/>
annual	<input type="text"/>
single event	<input checked="" type="text" value="x"/>

Violation Base Penalty

Three single events are recommended (one event for each day an odor was detected that contributed to the documented nuisance odor conditions).

Good Faith Efforts to Comply

Reduction

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

Extraordinary	<input type="text"/>	<input type="text"/>
Ordinary	<input checked="" type="text" value="x"/>	<input type="text"/>
N/A	<input type="text"/>	<input type="text"/>

Notes The Respondents achieved compliance on October 1, 2019, prior to the Notice of Enforcement dated September 8, 2020.

Violation Subtotal

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Renda Environmental, Inc. and Trinity River Authority of Texas (Site 3)
Case ID No. 59899
Reg. Ent. Reference No. RN110859683
Media Air
Violation No. 1

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)	\$20,000	30-Aug-2019	1-Oct-2019	0.09	\$88	n/a	\$88

Notes for DELAYED costs

Estimated cost to cease all biosolids land application operations at Site 3 and for Trinity River Authority of Texas to begin applying chlorine dioxide to all material prior to Renda Environmental, Inc. receiving the biosolids and taking the biosolids to the land application site. The Date Required is the first date an odor was detected and the Final Date is the 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 \$20,000

TOTAL \$88

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

Compliance History Report for CN600418578, RN110859709, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN600418578, Renda Environmental, Inc. **Classification:** HIGH **Rating:** 0.05
Regulated Entity: RN110859709, MACON BODLE APPLICATION SITE DCTB2 **Classification:** UNCLASSIFIED **Rating:** -----
Complexity Points: 4 **Repeat Violator:** NO
CH Group: 11 - Waste Management (Excluding Landfills)
Location: APPROXIMATELY 0.45 MILE SOUTH OF THE INTERSECTION OF EAST BELT LINE ROAD AND SUNRISE ROAD, DALLAS COUNTY, TEXAS
TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

AIR QUALITY NON PERMITTED ID NUMBER
R04110859709

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

Date Compliance History Report Prepared: May 17, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 17, 2016 to May 17, 2021

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

Name: Abigail Lindsey

Phone: (512) 239-2576

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 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:

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

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

Compliance History Report for CN601265945, RN110859709, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN601265945, Trinity River Authority Of Texas
Classification: SATISFACTORY **Rating:** 4.96

Regulated Entity: RN110859709, MACON BODLE APPLICATION SITE DCTB2
Classification: UNCLASSIFIED **Rating:** -----

Complexity Points: 1 **Repeat Violator:** NO

CH Group: 11 - Waste Management (Excluding Landfills)

Location: APPROXIMATELY 0.45 MILE SOUTH OF THE INTERSECTION OF EAST BELT LINE ROAD AND SUNRISE ROAD, DALLAS COUNTY, TEXAS

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

AIR QUALITY NON PERMITTED ID NUMBER
R04110859709

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

Date Compliance History Report Prepared: May 17, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 17, 2016 to May 17, 2021

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

Name: Abigail Lindsey

Phone: (512) 239-2576

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 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:

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

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

Compliance History Report for CN600418578, RN110859691, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN600418578, Renda Environmental, Inc. **Classification:** HIGH **Rating:** 0.05
Regulated Entity: RN110859691, RAY LYNN CAMPBELL APPLICATION SITE DCRL3 **Classification:** UNCLASSIFIED **Rating:** -----
Complexity Points: 4 **Repeat Violator:** NO
CH Group: 11 - Waste Management (Excluding Landfills)
Location: APPROXIMATELY 0.85 MI EAST OF THE INTERSECTION OF SOUTH LANCASTER HUTCHINS ROAD AND EAST BELT LINE ROAD, DALLAS COUNTY, TEXAS
TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

AIR QUALITY NON PERMITTED ID NUMBER
R04110859691

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

Date Compliance History Report Prepared: May 17, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 17, 2016 to May 17, 2021

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

Name: Abigail Lindsey

Phone: (512) 239-2576

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 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:

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

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

Compliance History Report for CN601265945, RN110859691, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN601265945, Trinity River Authority Of Texas **Classification:** SATISFACTORY **Rating:** 4.96

Regulated Entity: RN110859691, RAY LYNN CAMPBELL APPLICATION SITE DCRL3 **Classification:** UNCLASSIFIED **Rating:** -----

Complexity Points: 1 **Repeat Violator:** NO

CH Group: 11 - Waste Management (Excluding Landfills)

Location: APPROXIMATELY 0.85 MI EAST OF THE INTERSECTION OF SOUTH LANCASTER HUTCHINS ROAD AND EAST BELT LINE ROAD, DALLAS COUNTY, TEXAS

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):
AIR QUALITY NON PERMITTED ID NUMBER
R04110859691

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

Date Compliance History Report Prepared: May 17, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 17, 2016 to May 17, 2021

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.
Name: Abigail Lindsey **Phone:** (512) 239-2576

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 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:

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

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

Compliance History Report for CN600418578, RN110859683, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN600418578, Renda Environmental, Inc. **Classification:** HIGH **Rating:** 0.05
Regulated Entity: RN110859683, MACON BODLE APPLICATION SITE DCTB4 **Classification:** UNCLASSIFIED **Rating:** -----
Complexity Points: 4 **Repeat Violator:** NO
CH Group: 11 - Waste Management (Excluding Landfills)
Location: APPROXIMATELY 1.63 MILES EAST OF THE INTERSECTION OF SOUTH LANCASTER HUTCHINS ROAD AND EAST BELT LINE ROAD, DALLAS COUNTY, TEXAS
TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

AIR QUALITY NON PERMITTED ID NUMBER
R04110859683

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

Date Compliance History Report Prepared: May 17, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 17, 2016 to May 17, 2021

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

Name: Abigail Lindsey

Phone: (512) 239-2576

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 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:

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

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

Compliance History Report for CN601265945, RN110859683, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN601265945, Trinity River Authority Of Texas **Classification:** SATISFACTORY **Rating:** 4.96
Regulated Entity: RN110859683, MACON BODLE APPLICATION SITE DCTB4 **Classification:** UNCLASSIFIED **Rating:** -----
Complexity Points: 1 **Repeat Violator:** NO
CH Group: 11 - Waste Management (Excluding Landfills)
Location: APPROXIMATELY 1.63 MILES EAST OF THE INTERSECTION OF SOUTH LANCASTER HUTCHINS ROAD AND EAST BELT LINE ROAD, DALLAS COUNTY, TEXAS
TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

AIR QUALITY NON PERMITTED ID NUMBER
R04110859683

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

Date Compliance History Report Prepared: May 17, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 17, 2016 to May 17, 2021

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

Name: Abigail Lindsey

Phone: (512) 239-2576

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 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:

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

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	
RENDA ENVIRONMENTAL, INC.	§	TEXAS COMMISSION ON
AND TRINITY RIVER	§	
AUTHORITY OF TEXAS	§	
RN110859709, RN110859691,	§	
AND RN110859683	§	ENVIRONMENTAL QUALITY

**AGREED ORDER
DOCKET NO. 2020-1278-AIR-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 Renda Environmental, Inc. and Trinity River Authority of Texas (the "Respondents") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondents together stipulate that:

1. The Trinity River Authority of Texas owns and operates a wastewater treatment plant located at 6500 West Singleton Boulevard in Dallas, Dallas County, Texas and Renda Environmental, Inc. owns and operates a biosolids application business with a business office located at 522 Benson Lane in Roanoke, Denton County, Texas. Biosolids that were generated from the wastewater treatment plant were applied to the biosolid land application site located approximately 0.45 mile south of the intersection of East Belt Line Road and Sunrise Road in Dallas County, Texas (RN110859709, "Site 1"); located approximately 0.85 mile east of the intersection of South Lancaster Hutchins Road and East Belt Line Road in Dallas County, Texas, (RN110859691, "Site 2"); and located approximately 1.63 miles east of the intersection of South Lancaster Hutchins Road and East Belt Line Road in Dallas County, Texas (RN110859683, "Site 3"), (collectively referred to as the "Sites"). The Sites consist or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. The Executive Director and the Respondents 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 Respondents are 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. HEALTH & SAFETY CODE ch. 382 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 Respondents of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

4. An administrative penalty in the amount of \$19,688 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondents paid \$15,751 of the penalty and \$3,937 is deferred contingent upon the Respondents' 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 Respondents fail 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 Respondents 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 Respondents have 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.
9. The Executive Director recognizes that the Respondents implemented the following corrective measures at the Sites:
 - a. By September 16, 2019, ceased all biosolids land application operations at the Sites.
 - b. By October 1, 2019, Trinity River Authority of Texas began applying chlorine dioxide to all material prior to Renda Environmental, Inc. receiving the biosolids and taking the biosolids to the land application site.

II. ALLEGATIONS

1. During a record review conducted at Site 1 on August 31, 2020, an investigator documented that the Respondents failed to prevent nuisance odor conditions, in violation of 30 TEX. ADMIN. CODE § 101.4 and TEX. HEALTH & SAFETY CODE § 382.085(a) and (b). Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on September 13, 2019 and September 18, 2019, detected very light to moderate and offensive manure odors on September 13, 2019, and detected very light to moderate and offensive manure odors on September 18, 2019 that resulted in the documentation of nuisance odor conditions at Site 1.

2. During a record review conducted at Site 2 on August 31, 2020, an investigator documented that the Respondents failed to prevent nuisance odor conditions, in violation of 30 TEX. ADMIN. CODE § 101.4 and TEX. HEALTH & SAFETY CODE § 382.085(a) and (b). Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019 and September 5, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fish undertones on August 30, 2019; detected moderate and offensive fishy odors on September 5, 2019; and detected light to moderate and offensive manure odors on September 5, 2019 that resulted in the documentation of nuisance odor conditions at Site 2.
3. During a record review conducted at Site 3 on August 31, 2020, an investigator documented that the Respondents failed to prevent nuisance odor conditions, in violation of 30 TEX. ADMIN. CODE § 101.4 and TEX. HEALTH & SAFETY CODE § 382.085(a) and (b). Specifically, TCEQ staff conducted off-site odor surveys at the complainants' sites or equal distance on August 30, 2019, September 5, 2019, and September 13, 2019; detected very light to moderate and offensive manure odors on August 30, 2019; detected light to strong and offensive manure odors with fishy undertones on August 30, 2019; detected moderate to strong and offensive manure odors on September 5, 2019; and detected moderate and offensive manure odors on September 13, 2019 that resulted in the documentation of nuisance odor conditions at Site 3.

III. DENIALS

The Respondents generally deny each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

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

1. The Respondents are assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondents' 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: Renda Environmental, Inc. and Trinity River Authority of Texas, Docket No. 2020-1278-AIR-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 Respondents are jointly and severally liable for the violations documented in this Order, and are jointly and severally liable for timely and satisfactory compliance with all terms and conditions of this Order.
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 Respondents. The Respondents are ordered to give notice of this Order to personnel who maintain day-to-day control over the Site operations referenced in this Order.
5. 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 Respondents shall be made in writing to the Executive Director. Extensions are not effective until the Respondents receive written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. This Order, issued by the Commission, shall not be admissible against the Respondents 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.
7. 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.
8. 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



For the Executive Director

5/2/2022

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.



Signature

3/10/22
Date

Corey Wells
Name (Printed or typed)
Authorized Representative of
Renda Environmental, Inc.

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.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY


_____ For the Commission	_____ Date
 _____ For the Executive Director	<u>5/2/2022</u> _____ 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.

 Signature	<u>5-24-2022</u> Date
<u>PATRICIA M. Cleveland</u> Name (Printed or typed)	<u>Executive Manager,</u> Title
Authorized Representative of Trinity River Authority of Texas	<u>Northern Region</u>

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.