

Executive Summary – Enforcement Matter – Case No. 61692

Conesus LLC

RN100804467

Docket No. 2021-1628-AIR-E

Order Type:

Findings Agreed Order

Findings Order Justification:

People or environmental receptors have been exposed to pollutants which exceed levels that are protective.

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Conesus Tejas Facility, 106 Tejas Drive, Terrell, Kaufman County

Type of Operation:

Metallurgical recycling

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: July 21, 2023

Comments Received: No

Penalty Information

Total Penalty Assessed: \$35,250

Total Paid to General Revenue: \$35,250

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: No

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: September 1, 2020 through November 17, 2021

Date(s) of NOE(s): December 6, 2021

Executive Summary – Enforcement Matter – Case No. 61692

Conesus LLC

RN100804467

Docket No. 2021-1628-AIR-E

Violation Information

Caused, suffered, allowed, or permitted the emission of any air contaminant or the performance of any activity that caused or contributed to, or that will cause or contribute to, air pollution [TEX. HEALTH & SAFETY CODE § 382.085(a) and (b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By October 31, 2019, the Respondent implemented measures and procedures in order to ensure that the Plant's lead emissions did not cause or contribute to a condition of air pollution.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Yuliya Dunaway, Enforcement Division, Enforcement Team 2, MC R-13, (210) 403-4077; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Dale Sewell, CEM, Environmental Manager, Conesus LLC, 106 Tejas Drive, Terrell, Texas 75160-6573

Respondent's Attorney: Eric Groten



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned	13-Dec-2021	Screening	15-Dec-2021	EPA Due	
	PCW	9-Jun-2023				

RESPONDENT/FACILITY INFORMATION	
Respondent	Conecsus LLC
Reg. Ent. Ref. No.	RN100804467
Facility/Site Region	4-Dallas/Fort Worth
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	61692	No. of Violations	1
Docket No.	2021-1628-AIR-E	Order Type	Findings
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Yuliya Dunaway
		EC's Team	Enforcement Team 2
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$37,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	19.0% Adjustment	Subtotals 2, 3, & 7	\$7,125
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Notes: Enhancement for one order containing a denial of liability. Reduction for one notice of intent to conduct an audit.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$9,375
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Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$251
 Estimated Cost of Compliance: \$10,000
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$35,250
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0% Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$35,250
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$35,250
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DEFERRAL	0.0% Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes: No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$35,250
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Screening Date 15-Dec-2021

Docket No. 2021-1628-AIR-E

PCW

Respondent Conesus LLC

Policy Revision 4 (April 2014)

Case ID No. 61692

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100804467

Media Air

Enf. Coordinator Yuliya Dunaway

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>)	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	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>)	1	-1%
	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) 19%

>> **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 one order containing a denial of liability. Reduction for one notice of intent to conduct an audit.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 19%

>> **Final Compliance History Adjustment**

Final Adjustment Percentage *capped at 100% 19%

Screening Date 15-Dec-2021 **Docket No.** 2021-1628-AIR-E **PCW**
Respondent Conesus LLC *Policy Revision 4 (April 2014)*
Case ID No. 61692 *PCW Revision March 26, 2014*
Reg. Ent. Reference No. RN100804467
Media Air
Enf. Coordinator Yuliya Dunaway

Violation Number 1
Rule Cite(s) Tex. Health & Safety Code § 382.085(a) and (b)
Violation Description Caused, suffered, allowed, or permitted the emission of any air contaminant or the performance of any activity that caused or contributed to, or that will cause or contribute to, air pollution. Specifically, during the review of the validated ambient air emissions data from the TCEQ Continuous Ambient Monitoring Station No. 1089, the Respondent caused or contributed to exceedances of the national primary and secondary ambient air quality standard for lead of 0.15 microgram per cubic meter ("µg/m³") based on an arithmetic mean concentration over a 3-month period by a range from 0.02 µg/m³ to 0.08 µg/m³ for the three-month rolling periods ending from May 2019 through September 2019.
Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	x			30.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes Human health or the environment has been exposed to pollutants that exceeded 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	5	152	Number of violation days
daily			Violation Base Penalty \$37,500
weekly			
monthly	x		
quarterly			
semiannual			
annual			
single event			

Five monthly events are recommended for the period of non-compliance from May 1, 2019 through September 30, 2019.

Good Faith Efforts to Comply 25.0% Reduction \$9,375

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

Notes The Respondent completed the corrective measures by October 31, 2019, prior to the Notice of Enforcement dated December 6, 2021.

Violation Subtotal \$28,125

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

Estimated EB Amount \$251 **Violation Final Penalty Total** \$35,250
This violation Final Assessed Penalty (adjusted for limits) \$35,250

Economic Benefit Worksheet

Respondent Conecsus LLC
Case ID No. 61692
Reg. Ent. Reference No. RN100804467
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
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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)	\$10,000	1-May-2019	31-Oct-2019	0.50	\$251	n/a	\$251

Notes for DELAYED costs

Estimated cost to implement measures and procedures in order to ensure that the Plant's lead emissions did not cause or contribute to a condition of air pollution. The Date Required is the initial date of non-compliance 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

\$10,000

TOTAL

\$251



Compliance History Report

Compliance History Report for CN604058693, RN100804467, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator: CN604058693, Conesus LLC **Classification:** SATISFACTORY **Rating:** 2.52
Regulated Entity: RN100804467, CONESUS TEJAS FACILITY **Classification:** SATISFACTORY **Rating:** 2.52
Complexity Points: 14 **Repeat Violator:** NO
CH Group: 14 - Other
Location: 106 TEJAS DRIVE, TERRELL, KAUFMAN COUNTY, TEXAS
TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

AIR NEW SOURCE PERMITS PERMIT 19430	AIR NEW SOURCE PERMITS ACCOUNT NUMBER KB0104U
AIR NEW SOURCE PERMITS AFS NUM 4825700028	MUNICIPAL SOLID WASTE PROCESSING PERMIT 100284
STORMWATER PERMIT TXR05BF08	AIR EMISSIONS INVENTORY ACCOUNT NUMBER KB0104U
POLLUTION PREVENTION PLANNING ID NUMBER P00673	INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 39525
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000000034	TAX RELIEF ID NUMBER 19679
TAX RELIEF ID NUMBER 19681	TAX RELIEF ID NUMBER 19680

Compliance History Period: September 01, 2017 to August 31, 2022 **Rating Year:** 2022 **Rating Date:** 09/01/2022
Date Compliance History Report Prepared: December 21, 2022
Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: December 21, 2017 to December 21, 2022

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

Name: Yuliya Dunaway **Phone:** (210) 403-4077

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: 06/20/2018 ADMINORDER 2015-1321-IHW-E (1660 Order-Agreed Order With Denial)
Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)
Description: Failed to update the NOR for any changes or additional information within 90 days of the occurrence of such change or of becoming aware of additional information, in violation of 30 TEX. ADMIN. CODE § 335.6(c), as documented during investigations conducted on October 28, 2014 and June 10, 2015. Specifically, the NOR was not updated to inactivate 14 waste streams, three NOR Units, and the rotary furnace slag waste pile.
Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(2)
30 TAC Chapter 335, SubChapter C 335.69(a)(3)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(2)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(3)
Description: Failed to clearly label all hazardous waste containers with the words "Hazardous Waste", in violation of 30 TEX. ADMIN. CODE § 335.69(a)(2) and (a)(3) and 40 CODE OF FEDERAL REGULATIONS ("CFR") § 262.34(a)(2) and (a)(3), as documented during an investigation conducted on October 28, 2014.
Classification: Major

Citation: 30 TAC Chapter 335, SubChapter B 335.43(a)
40 CFR Chapter 270, SubChapter I, PT 270, SubPT A 270.1(c)

Description: Stored hazardous waste without first having obtained a permit from the TCEQ, in violation of 30 TEX. ADMIN. CODE § 335.43(a) and 40 CFR § 270.1(c). Specifically, the Respondent stored a rotary furnace slag and 48 drums of hazardous dust/sludge without authorization prior to recycling.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
30 TAC Chapter 335, SubChapter E 335.112(a)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a)

Description: Failed to keep containers of hazardous waste closed except when adding or removing waste, in violation of 30 Tex. Admin. Code §§ 335.69(a)(1)(A) and 335.112(a) and 40 CFR § 265.173(a), as documented during an investigation conducted on October 28, 2014. Specifically, two hazardous waste roll-off containers were not properly closed.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	March 20, 2019	(1541333)
Item 2	May 05, 2020	(1633329)
Item 3	February 25, 2022	(1764004)

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:

Notice of Intent Date: 12/10/2019 (1618266)
No DOV Associated

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

Item 6*	May 05, 2020**	(1633329)
Item 7	August 30, 2021**	(1657225)
Item 8	December 06, 2021**	(1644228)
Item 9*	February 25, 2022**	(1764004)
Item 10	August 26, 2022**	(1839063)

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2017 and 08/31/2022.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CONECSUS LLC
RN100804467

§
§
§
§
§

BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2021-1628-AIR-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Conecsus LLC (the "Respondent") 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 Respondent, represented by Eric Groten of the law firm of Vinson & Elkins LLP, presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that 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. The duties and responsibilities imposed by this Order are binding upon the Respondent.

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

I. FINDINGS OF FACT

1. The Respondent owns and operates a metallurgical recycling located at 106 Tejas Drive in Terrell, Kaufman County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. During a record review for the Plant conducted from September 1, 2020 through November 17, 2021, an investigator documented that during the review of the validated ambient air emissions data from the TCEQ Continuous Ambient Monitoring Station No. 1089, the Respondent caused or contributed to the exceedances of the national primary and secondary ambient air quality standard for lead of 0.15 microgram per cubic meter ("µg/m³") based on an arithmetic mean concentration over a 3-month period by a range from 0.02 µg/m³ to 0.08 µg/m³ for the three-month rolling periods ending from May 2019 through September 2019.
3. The Executive Director recognizes that by October 31, 2019, the Respondent implemented measures and procedures in order to ensure that the Plant's lead emissions did not cause or contribute to a condition of air pollution.

II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2, the Respondent caused, suffered, allowed, or permitted the emission of any air contaminant or the performance of any activity that caused or contributed to, or that will cause or contribute to, air pollution, in violation of TEX. HEALTH & SAFETY CODE § 382.085(a) and (b).
3. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
4. An administrative penalty in the amount of \$35,250 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$35,250 penalty.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 4 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Conecsus LLC, Docket No. 2021-1628-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
All relief not expressly granted in this Order is denied.
2. All relief not expressly granted in this Order is denied.
3. 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 Plant operations referenced in this Order.
4. 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.

5. 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 in this Order.
6. 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.
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
	7/26/2023
----- 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 OAG 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 OAG 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.

	6-22-23
----- Signature	----- Date
Dale Sewell, CEM	Environmental Manager
----- Name (Printed or typed) Authorized Representative of Conesus LLC	----- 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.