

Executive Summary – Enforcement Matter – Case No. 64826
Campbell Soup Supply Company L.L.C.
RN100216753
Docket No. 2023-1347-IWD-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

IWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Campbell Soup Paris Plant, 500 North Loop 286, approximately 1/4 mile west of the intersection of United States Loop Highway 286 and U.S. Highway 271, Paris, Lamar County

Type of Operation:

Canning facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Past-Due Fees: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: August 29, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$22,382

Amount Deferred for Expedited Settlement: \$4,476

Total Paid to General Revenue: \$17,906

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: May 24, 2023

Date(s) of NOE(s): August 18, 2023

Executive Summary – Enforcement Matter – Case No. 64826
Campbell Soup Supply Company L.L.C.
RN100216753
Docket No. 2023-1347-IWD-E

Violation Information

1. Failed to comply with permitted effluent limitations for *Escherichia coli*, biochemical oxygen demand, aluminum, dissolved oxygen, and oil and grease [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0001012000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 101, 201, 301, and 401, and Interim Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001].

2. Failed to collect and analyze effluent samples at intervals specified in the permit. Specifically, the Respondent did not analyze effluent samples for biochemical oxygen demand and total suspended solids during the monthly monitoring period of April 2022 [30 TEX. ADMIN. CODE §§ 305.125(1) and 319.5(b) and TPDES Permit No. WQ0001012000, Interim Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By January 31, 2025, the Respondent collected and analyzed effluent samples for twelve consecutive months.

Technical Requirements:

The Order will require the Respondent to, within 130 days, submit a written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0001012000, including specific corrective actions that were implemented at the Plant to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Samantha Smith, Enforcement Division, Enforcement Team 7, MC R-12, (512) 239-2099; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Daniel Poland, Enterprise Transformation Officer, Campbell Soup Supply Company L.L.C., 1 Campbell Place, Camden, New Jersey 08103

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	28-Aug-2023	Screening	14-Sep-2023	EPA Due	5-Sep-2023
	PCW	7-Jul-2025				

RESPONDENT/FACILITY INFORMATION

Respondent	Campbell Soup Supply Company L.L.C.
Reg. Ent. Ref. No.	RN100216753
Facility / Site Region	5-Tyler
Major / Minor Source	Major

CASE INFORMATION

Enf./Case ID No.	64826	No. of Violations	4
Docket No.	2023-1347-IWD-E	Order Type	1660
Media Program(s)	Water Quality	Government / Non-Profit	No
Multi-Media		Enf. Coordinator	Samantha Smith
		EC's Team	Enforcement Team 1
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$20,250
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ADJUSTMENTS (+ / -) TO SUBTOTAL 1

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

Compliance History	10.0 %	Adjustment	Subtotals 2, 3, & 7	\$2,025
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Notes	Enhancement for two months of self-reported effluent violations
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Culpability	No	0.0 %	Enhancement	Subtotal 4	\$0
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Notes	The Respondent does not meet the culpability criteria.
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Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0 %	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$2,359	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$15,100	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$22,275
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.5 %	Adjustment	\$107
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes	Recommended enhancement to capture the avoided cost of compliance associated with Violation No. 4.
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Final Penalty Amount	\$22,382
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$22,382
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DEFERRAL	20.0 %	Reduction	Adjustment	-\$4,476
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes	Deferral offered for expedited settlement.
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PAYABLE PENALTY	\$17,906
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Screening Date	14-Sep-2023	Docket No.	2023-1347-IWD-E	PCW
Respondent	Campbell Soup Supply Company L.L.C.			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	64826			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN100216753			
Media	Water Quality			
Enf. Coordinator	Samantha Smith			

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>)	2	10%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 10%

>> Repeat Violator (Subtotal 3)

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance
History
Notes

Enhancement for two months of self-reported effluent violations

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

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 10%

Screening Date	14-Sep-2023	Docket No.	2023-1347-IWD-E	PCW
Respondent	Campbell Soup Supply Company L.L.C.	Policy Revision 5 (January 28, 2021)		
Case ID No.	64826	PCW Revision February 11, 2021		
Reg. Ent. Reference No.	RN100216753			
Media	Water Quality			
Enf. Coordinator	Samantha Smith			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0001012000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 201, 301, and 401			
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation tables.			
Base Penalty				\$25,000

> > Environmental, Property and Human Health Matrix

OR	Harm					
	Release	Major	Moderate	Minor		
	Actual					
	Potential			X		
					Percent	7.0%

> > Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor		
					Percent	0.0%

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

Adjustment	\$23,250
\$1,750	

Violation Events

Number of Violation Events	3	59	Number of violation days
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daily							
weekly							
monthly							
quarterly							
semiannual							
annual							
single event	X						

Three single events are recommended, one for each outfall.

Violation Base Penalty	\$5,250
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Good Faith Efforts to Comply

	0.0 %		
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary			
N/A	X		

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

Violation Subtotal	\$5,250
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Economic Benefit (EB) for this violation

	\$2,252		
Estimated EB Amount		Violation Final Penalty Total	\$5,803
This violation Final Assessed Penalty (adjusted for limits)			\$5,803

Statutory Limit Test

Economic Benefit Worksheet

Respondent Campbell Soup Supply Company L.L.C.
Case ID No. 64826
Reg. Ent. Reference No. RN100216753
Media Water Quality
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)	\$15,000	31-Jan-2023	31-Jan-2026	3.00	\$2,252	n/a	\$2,252

Notes for DELAYED costs

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

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$15,000

TOTAL

\$2,252

Screening Date	14-Sep-2023	Docket No.	2023-1347-IWD-E	PCW
Respondent	Campbell Soup Supply Company L.L.C.	Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021		
Case ID No.	64826			
Reg. Ent. Reference No.	RN100216753			
Media	Water Quality			
Enf. Coordinator	Samantha Smith			
Violation Number	2			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0001012000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 101			
Violation Description	Failed to comply with permitted effluent limitations as shown in the attached effluent violation tables.			
Base Penalty				\$25,000

> > Environmental, Property and Human Health Matrix

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

> > Programmatic Matrix

	Falsification	Major	Moderate	Minor	
Matrix Notes	Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.				Percent 0.0%

Adjustment	\$21,250
\$3,750	

Violation Events

Number of Violation Events	1	28	Number of violation days
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	daily						
	weekly						
	monthly						
	quarterly						
	semiannual						
	annual						
	single event	X					

One single event is recommended.

Good Faith Efforts to Comply	0.0 %	Reduction	\$0
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	Before NOE/NOV	NOE/NOV to EDRP/Settlement Offer	
Extraordinary			
Ordinary			
N/A	X		
Notes	The Respondent does not meet the good faith criteria for this violation.		

Violation Subtotal	\$3,750
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Economic Benefit (EB) for this violation

Estimated EB Amount	Statutory Limit Test
\$0	Violation Final Penalty Total \$4,145
This violation Final Assessed Penalty (adjusted for limits) \$4,145	

Economic Benefit Worksheet

Respondent Campbell Soup Supply Company L.L.C.
Case ID No. 64826
Reg. Ent. Reference No. RN100216753
Media Water Quality
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering / Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training / Sampling				0.00	\$0	n/a	\$0
Remediation / Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit Worksheet for Violation No. 1

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date	14-Sep-2023	Docket No.	2023-1347-IWD-E	PCW
Respondent	Campbell Soup Supply Company L.L.C.	Policy Revision 5 (January 28, 2021)		
Case ID No.	64826	PCW Revision February 11, 2021		
Reg. Ent. Reference No.	RN100216753			
Media	Water Quality			
Enf. Coordinator	Samantha Smith			
Violation Number	3			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0001012000, Interim Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001			
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation tables.			
		Base Penalty	\$25,000	

> > Environmental, Property and Human Health Matrix

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

> > Programmatic Matrix

	Falsification	Major	Moderate	Minor	
Percent					0.0%

Matrix Notes: Oil and grease was evaluated to determine whether the discharge amounts of pollutants exceeded protective levels. Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events	1	31	Number of violation days
----------------------------	---	----	--------------------------

daily				
weekly				
monthly				
quarterly	X			
semiannual				
annual				
single event				
Violation Base Penalty				\$7,500

One quarterly event is recommended for the quarter containing the month of January 2023.

Good Faith Efforts to Comply

	0.0%			
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
Extraordinary				
Ordinary				
N/A	X			
Notes	The Respondent does not meet the good faith criteria for this violation.			
Violation Subtotal				\$7,500

Economic Benefit (EB) for this violation

	Statutory Limit Test
Estimated EB Amount	\$0
	Violation Final Penalty Total
	\$8,290
This violation Final Assessed Penalty (adjusted for limits)	
\$8,290	

Economic Benefit Worksheet

Respondent Campbell Soup Supply Company L.L.C.
Case ID No. 64826
Reg. Ent. Reference No. RN100216753
Media Water Quality
Violation No. 3

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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit Worksheet for Violation No. 1

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date 14-Sep-2023 Respondent Campbell Soup Supply Company L.L.C. Case ID No. 64826 Reg. Ent. Reference No. RN100216753 Media Water Quality Enf. Coordinator Samantha Smith	Docket No. 2023-1347-IWD-E Base Penalty \$25,000	PCW Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021
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Violation Number	4	
Rule Cite(s)		30 Tex. Admin. Code §§ 305.125(1) and 319.5(b) and TPDES Permit No. WQ0001012000, Interim Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001
Violation Description		Failed to collect and analyze samples effluent samples at intervals specified in the permit. Specifically, the Respondent did not analyze effluent samples for biochemical oxygen demand (5-day) and total suspended solids during the monthly monitoring period of April 2022.

Base Penalty \$25,000

> > Environmental, Property and Human Health Matrix

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

> > Programmatic Matrix

	Falsification	Major	Moderate	Minor	
					Percent 0.0%

Matrix Notes	Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.
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Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events	1	30	Number of violation days
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	daily				
	weekly				Violation Base Penalty \$3,750
	monthly				
	quarterly				
	semiannual				
	annual				
	single event	X			

One single event is recommended for the month of April 2022.

Good Faith Efforts to Comply

	0.0 %	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	
Notes	The Respondent does not meet the good faith criteria for this violation.	

Violation Subtotal \$3,750

Economic Benefit (EB) for this violation

	Statutory Limit Test
Estimated EB Amount	\$107
	Violation Final Penalty Total \$4,145
This violation Final Assessed Penalty (adjusted for limits) \$4,145	

Economic Benefit Worksheet

Respondent Campbell Soup Supply Company L.L.C.
Case ID No. 64826
Reg. Ent. Reference No. RN100216753
Media Water Quality
Violation No. 4

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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

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	\$100	30-Apr-2022	14-Sep-2023	1.38	\$7	\$100	\$107
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Estimated avoided cost to collect and analyze effluent samples. The Date Required is the initial date of noncompliance, and the Final Date is the screening date.

Approx. Cost of Compliance

\$100

TOTAL

\$107

Campbell Soup Supply Company L.L.C TPDES Permit No. WQ0001012000 Docket No. 2023-1347-IWD-E Case No. 64826			
Effluent Violation Tables			
	Outfall 001	Outfall 101	Outfall 101
	Oil & Grease Daily Max. Conc.	<i>E. coli</i> Daily Max. Conc.	Oil & Grease Daily Max. Loading
Monitoring Period	Limit = 20 mg/L	Limit = 399 CFU/100 mL	Limit = 1,667 lbs/day
January 2023	53	NA	NA
February 2023	c	2,419.6	1,811.39

Outfall 201	BOD Daily Avg. Conc.	BOD Daily Max. Conc.	DO Monthly Min.
Monitoring Period	Limit = 13.5 mg/L	Limit = 30 mg/L	Limit = 4.0 mg/L
February 2023	29.83	47.1	2.95
March 2023	39.32	86.5	c

Outfall 301	BOD Daily Avg. Conc.	BOD Daily Max. Conc.	DO Monthly Min.
Monitoring Period	Limit = 13.5 mg/L	Limit = 30 mg/L	Limit = 4.0 mg/L
February 2023	29.83	47.1	2.43
March 2023	47	c	3.91

Outfall 401	BOD Daily Avg. Conc.	BOD Daily Max. Conc.	DO Monthly Min.	Total Aluminum Daily Max. Conc.
Monitoring Period	Limit = 13.5 mg/L	Limit = 30 mg/L	Limit = 4.0 mg/L	Limit = 1.77 mg/L
February 2023	29.83	47.1	c	1.81
March 2023	39.32	86.5	3.89	c

E. coli = Escherichia coli BOD = biochemical oxygen demand (5-day) DO = dissolved oxygen
 mg/L = milligrams per liter CFU/100 mL = colony forming unit per 100 milliliters
 Avg. = average Con. = concentration lbs/day = pounds per day
 Max. = Maximum Min. = minimum c = compliant NA= Not applicable



Compliance History Report

Compliance History Report for CN601112014, RN100216753, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN601112014, Campbell Soup Supply Company L.L.C. **Classification:** SATISFACTORY **Rating:** 1.20

Regulated Entity: RN100216753, CAMPBELL SOUP PARIS PLANT **Classification:** SATISFACTORY **Rating:** 1.20

Complexity Points: 15 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 500 North Loop 286, approximately 1/4 mile west of the intersection of United States Loop Highway 286 and United States Highway 271, Paris, Lamar County, Texas

TCEQ Region: REGION 05 - TYLER

ID Number(s):

AIR NEW SOURCE PERMITS AFS NUM 4827700001

AIR NEW SOURCE PERMITS ACCOUNT NUMBER LA0042L

AIR NEW SOURCE PERMITS REGISTRATION 55354

AIR NEW SOURCE PERMITS PERMIT 56233

AIR NEW SOURCE PERMITS REGISTRATION 82706

AIR NEW SOURCE PERMITS REGISTRATION 111459

AIR NEW SOURCE PERMITS REGISTRATION 123716

AIR NEW SOURCE PERMITS REGISTRATION 111456

AIR NEW SOURCE PERMITS REGISTRATION 111462

AIR NEW SOURCE PERMITS REGISTRATION 146884

AIR NEW SOURCE PERMITS REGISTRATION 171322

WASTEWATER PERMIT WQ0001012000

WASTEWATER EPA ID TX0008982

AIR EMISSIONS INVENTORY ACCOUNT NUMBER LA0005R

POLLUTION PREVENTION PLANNING ID NUMBER P00850

INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD007352693

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30453

Compliance History Period: September 01, 2019 to August 31, 2024 **Rating Year:** 2024 **Rating Date:** 09/01/2024

Date Compliance History Report Prepared: July 07, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: July 07, 2020 to July 07, 2025

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

Name: Samantha Smith

Phone: (512) 239-2099

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:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	July 21, 2020	(1673621)	Item 23	June 19, 2022	(1835142)
Item 2	August 17, 2020	(1680397)	Item 24	July 20, 2022	(1842346)
Item 3	September 16, 2020	(1686965)	Item 25	August 18, 2022	(1848478)
Item 4	November 13, 2020	(1712626)	Item 26	September 15, 2022	(1856276)
Item 5	December 21, 2020	(1712627)	Item 27	October 25, 2022	(1862633)
Item 6	January 12, 2021	(1712628)	Item 28	November 21, 2022	(1869547)
Item 7	February 15, 2021	(1725681)	Item 29	December 19, 2022	(1875396)
Item 8	March 23, 2021	(1725682)	Item 30	January 24, 2023	(1882218)
Item 9	April 14, 2021	(1725683)	Item 31	July 24, 2023	(1916299)
Item 10	May 21, 2021	(1740141)	Item 32	September 15, 2023	(1939231)
Item 11	June 21, 2021	(1747613)	Item 33	October 18, 2023	(1946081)
Item 12	July 28, 2021	(1739922)	Item 34	March 11, 2024	(1983758)
Item 13	August 18, 2021	(1757225)	Item 35	April 09, 2024	(1990288)
Item 14	September 20, 2021	(1766305)	Item 36	August 12, 2024	(2016853)
Item 15	October 25, 2021	(1776828)	Item 37	September 06, 2024	(2023870)
Item 16	November 29, 2021	(1783678)	Item 38	October 21, 2024	(2029994)
Item 17	December 22, 2021	(1790704)	Item 39	November 08, 2024	(2036314)
Item 18	January 20, 2022	(1798498)	Item 40	December 11, 2024	(2042425)
Item 19	February 18, 2022	(1806372)	Item 41	January 15, 2025	(2049253)
Item 20	March 21, 2022	(1813439)	Item 42	April 11, 2025	(2072191)
Item 21	April 28, 2022	(1820010)	Item 43	June 19, 2025	(2076663)
Item 22	May 19, 2022	(1828849)			

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

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

1	Date: 01/31/2025 (2056821)		
	Self Report? YES	Classification:	Moderate
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)		
	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
2	Date: 02/28/2025 (2065386)		
	Self Report? YES	Classification:	Moderate
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)		
	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CAMPBELL SOUP SUPPLY COMPANY
L.L.C.
RN100216753

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

AGREED ORDER DOCKET NO. 2023-1347-IWD-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Campbell Soup Supply Company L.L.C (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a canning facility located at 500 North Loop 286, approximately 1/4 mile west of the intersection of United States Loop Highway 286 and United States Highway 271 in Paris, Lamar County, Texas (the "Plant"). The Plant is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. WATER CODE ch. 26 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$22,382 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$17,906 of the penalty and \$4,476 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that by January 31, 2025, the Respondent collected and analyzed effluent samples for twelve consecutive months.

II. ALLEGATIONS

During a record review for the Plant conducted on May 24, 2023, an investigator documented that the Respondent:

1. Failed to comply with permitted effluent limitations in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0001012000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 101, 201, 301, and 401, and Interim Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001, as shown in the effluent violation tables below:

Effluent Violation Tables			
	Outfall 001	Outfall 101	Outfall 101
	Oil & Grease Daily Max. Conc.	<i>E. coli</i> Daily Max. Conc.	Oil & Grease Daily Max. Loading
Monitoring Period	Limit = 20 mg/L	Limit = 399 CFU/100 mL	Limit = 1,667 lbs/day
January 2023	53	NA	NA
February 2023	c	2,419.6	1,811.39

Outfall 201	BOD Daily Avg. Conc.	BOD Daily Max. Conc.	DO Monthly Min.
Monitoring Period	Limit = 13.5 mg/L	Limit = 30 mg/L	Limit = 4.0 mg/L
February 2023	29.83	47.1	2.95
March 2023	39.32	86.5	c

Outfall 301	BOD Daily Avg. Conc.	BOD Daily Max. Conc.	DO Monthly Min.
Monitoring Period	Limit = 13.5 mg/L	Limit = 30 mg/L	Limit = 4.0 mg/L
February 2023	29.83	47.1	2.43
March 2023	47	c	3.91

Outfall 401	BOD Daily Avg. Conc.	BOD Daily Max. Conc.	DO Monthly Min.	Aluminum Daily Max. Conc.
Monitoring Period	Limit = 13.5 mg/L	Limit = 30 mg/L	Limit = 4.0 mg/L	Limit = 1.77 mg/L
February 2023	29.83	47.1	c	1.81
March 2023	39.32	86.5	3.89	c

E. coli = *Escherichia coli* BOD = biochemical oxygen demand (5-day) DO = dissolved oxygen
 mg/L = milligrams per liter CFU/100 mL = colony forming unit per 100 milliliters
 Avg. = average Con. = concentration lbs/day = pounds per day
 Max. = Maximum Min. = minimum c = compliant NA = Not Applicable

- Failed to collect and analyze effluent samples at intervals specified in the permit, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and 319.5(b) and TPDES Permit No. WQ0001012000, Interim Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001. Specifically, the Respondent did not analyze effluent samples for

biochemical oxygen demand (5-day) and total suspended solids during the monthly monitoring period of April 2022.

III. DENIALS

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

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Campbell Soup Supply Company L.L.C, Docket No. 2023-1347-IWD-E" to:

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

2. The Respondent shall, within 130 days after the effective date of this Order, submit a written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0001012000, including specific corrective actions that were implemented at the Plant to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations. The certification shall include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with the permitted effluent limitations. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

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

with a copy to:

Water Section Manager
Tyler Regional Office
Texas Commission on Environmental Quality
2916 Teague Drive
Tyler, Texas 75701-3734

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant 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 Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. 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.
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

Krista Mello-Jurack

For the Executive Director

Date

11/10/2025

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.

[Signature]

Signature

7/22/2025

Date

Daniel L. Potand

Name (Printed or typed)

Authorized Representative of

Campbell Soup Supply Company L.L.C.

Enterprise Transformation Officer

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.