# 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



**PAYABLE PENALTY** 

# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES Assigned 28-Aug-2023

Assigned 28-Aug-2023 PCW 7-Jul-2025 Screening 1

Screening 14-Sep-2023 EPA Due 5-Sep-2023

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. Docket No. Docket No. Media Program(s) Multi-Media

Multi-Media

Admin. Penalty \$ Limit Minimum \$0 Maximum

Model Maximum \$0 Maximum

No. of Violations 4
Order Type 1660

Government/Non-Profit Enf. Coordinator Samantha Smith Ec's Team Enforcement Team 1

			Penalty	Calculati	on Section	n				
TOTAL BASE PE	TOTAL BASE PENALTY (Sum of violation base penalties)  Subtotal 1									
ADJUSTMENTS Subtotals 2-7 ar			OTAL 1 ng the Total Base Penalty	(Subtotal 1) by	the indicated percer	ntage.				
Compliance			otals 2, 3, & 7	\$2,025						
No	tes	Enhance	ment for two month	s of self-repoi	rted effluent vio	olations				
Culpability		No		0.0%	Enhancement		Subtotal 4	\$0		
No	Notes The Respondent does not meet the culpability criteria.									
Good Faith	Effo	ort to Comply	Total Adjustments				Subtotal 5	\$0		
Economic B	ene	efit		0.0%	Enhancement*		Subtotal 6	\$0		
Estim	ated	Total EB Amounts Cost of Compliance			nt the Total EB \$ Am	nount				
SUM OF SUBTO	ΓAL	₋S 1-7					Final Subtotal	\$22,275		
OTHER FACTOR Reduces or enhances the I					0.5%		Adjustment	\$107		
Notes		Recommend	ed enhancement to associated w	capture the a vith Violation		compliance				
	_					Final Pe	enalty Amount	\$22,382		
STATUTORY LIN	/I T	ADILISTME	NT			Final Acc	essed Penalty	\$22,382		
STATOTORT EIN	/II I	ADJUSTIVIE	141			FIIIAI ASS	esseu Penany	ΨZZ,00Z		
DEFERRAL					20.0%	Reduction	Adjustment	-\$4,476		
Reduces the Final Assesse	d Per	nalty by the indicate	ed percentage.				 ¬			
Notes	otes Deferral offered for expedited settlement.									
							_			

\$17,906

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Screening Date 14-Sep-2023

**Docket No.** 2023-1347-IWD-E

**Respondent** Campbell Soup Supply Company L.L.C.

Case ID No. 64826

Reg. Ent. Reference No. RN100216753

Media Water Quality

Enf. Coordinator Samantha Smith

Compliance History Worksheet >> Compliance History Site Enhancement (Subtotal 2)								
>> Co	mpilance Hist	Number of	Number	Adjust.				
	NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	2	10%				
		Other written NOVs	0	0%				
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%				
	Orders	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	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%				
	and Consent Decrees	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 (number of counts)	0	0%				
	Emissions	Chronic excessive emissions events (number of events)	0	0%				
	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)			0%				
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%				
		Environmental management systems in place for one year or more	No	0%				
	Other	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 Per	centage (Sub	total 2)	10%			
>> <b>R</b> e	peat Violator	(Subtotal 3)						
	No	Adjustment Per	centage (Sub	total 3)	0%			
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)						
	Satisfactory I	Performer Adjustment Per	centage (Sub	total 7)	0%			
>> Co	mpliance Hist	ory Summary						
	Compliance History Notes  Enhancement for two months of self-reported effluent violations							
=-	Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 10%							
>> Fina	> Final Compliance History Adjustment  Final Adjustment Percentage *capped at 100% 10%							

	Screening Date	14-Sep-2023	<b>Docket No.</b> 2023-1347-IWD-E	PCW
		Campbell Soup Supply Com	pany 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)		5.125(1), Tex. Water Code § 26.121(a)(1), an	
			ation System ("TPDES") Permit No. WQ00010	
		Effluent Limitations and M	onitoring Requirements No. 1, Outfall Nos. 20	<mark>1, 301,  </mark>
			and 401	
	Violation Description	Failed to comply with per	mitted effluent limitations, as shown in the at	tached
	·		effluent violation tables.	
			Rasa	Penalty \$25,000
			Buse	\$25,000
>> Env	ironmental, Proper	ty and Human Health	Matrix	
	Dalassa	Harm Major Madarata	Minor	
OR	<b>Release</b> Actual	Major Moderate	Minor	
OK	Potential		X Percent 7.0%	
	rotoritar		X 1 61 66111 7.070	
>>Prod	grammatic Matrix			
	Falsification	Major Moderate	Minor	
			Percent 0.0%	
	Human health	or the environment will or o	could be exposed to insignificant amounts of p	ollutants
	that would no		ective of human health or environmental rece	
	Notes	a resu	Ilt of the violation.	
			Adjustment	\$23,250
				¢1.750
				\$1,750
Violatio	on Events			
	Number of V	iolation Events 3	59 Number of violation of	lays
		daily		
		weekly		
		monthly	V: 1 5	<b>B</b>
		quarterly	Violation Base	Penalty \$5,250
		semiannual annual	-	
		single event X	-	
		Single event	4	
		Three single events are	recommended, one for each outfall.	
Good F	aith Efforts to Com	ply 0.0%		reduction \$0
Good F	aith Enorts to com	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	eduction
		Extraordinary	NOCETION TO EDITION OF THE STATE OF THE STAT	
		Ordinary		
		N/A X		
		Notes The Respor	ndent does not meet the good faith criteria	
			for this violation.	
			Violation 9	Subtotal \$5,250
Econon	nic Benefit (EB) for	this violation	Statutory Limit	Tost
ECOHON	inc benefit (EB) for	uns violation	Statutory Limit	i est
	Estimate	ed EB Amount	\$2,252 Violation Final Penal	Ity Total \$5,803
		This viols	ation Final Assessed Penalty (adjusted fo	r limits) \$5,803
		11113 VIUI	I mai 7.0003000 i charty (aujusteu 10	Ψ5,003

	E	conomic	Benefit '	Wor	rksheet		
Case ID No.	64826	p Supply Company	y L.L.C.				
Reg. Ent. Reference No. Media Violation No.	Water Quality	i				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	<b>EB Amount</b>
Item Description							
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	Plant, and ac the f	hieve compliance irst month of nonc	with the permitte compliance, and	ed efflu the Fin	ent limitations. The al Date is the estin	essary repairs/adjus e Date Required is t nated date of compl	he end date of iance.
Avoided Costs	ANNU	ALIZE avoided c	osts before en		item (except for	one-time avoided	•
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 Da	<b>e</b> 14-Sep-2023			ket No.	2023-1347-IWD-E		PCW
	Responder	t Campbell Soup S	upply Comp	any L.L.C.			Policy Revision	on 5 (January 28, 2021)
	Case ID N	<b>6</b> 4826					PCW Rev	ision February 11, 2021
Reg.	Ent. Reference N	. RN100216753						
_	Med	a Water Quality						
	Enf. Coordinate	r Samantha Smith						
	Violation Numb	er 2						
	Rule Cite(	30 Tex Admin	Code § 305	5 125(1). Tex \	Water Cod	le § 26.121(a)(1), and	TPDES	
						Monitoring Requireme		
				1, Outfall		3 - 1		
		Failed to comply	with narmitt	ad affluoret line	itatiana aa	chave in the attached	offluont	
	Violation Description	n Falled to comply	with permit	violation		shown in the attached	emuem	
				Violation	tables.			
						Base	Penalty	\$25,000
>> Env	vironmental, Prop	erty and Huma		Matrix				
	Dalaa	- M-!	Harm	NA:				
OR	<b>Relea</b> Actu		Moderate	Minor				
OK	Potent		Х			Percent 15.0%		
	Totoni	di	Λ			13.076		
>>Pro	grammatic Matrix							
	Falsificatio		Moderate	Minor				
						Percent 0.0%		
						cant amounts of polluta ronmental receptors as		
	Notes Would not e	xceed levels that an	•	the violation.	tii oi eiivii	ronnental receptors as	a result	
			O.	the violation.				
	<u></u>							
					Ad	justment	\$21,250	
								\$3,750
							<u> </u>	\$3,730
Violati	on Events							
				T		7		
	Number of	f Violation Events	1		28	Number of violation da	ays	
				<b>T</b>				
		daily						
		weekly						
		monthly quarterly				Violation Base	Denalty	\$3,750
		semiannual				Violation Base	r criarry	\$3,730
		annual						
		single event	Χ					
				1				
			One single	event is recom	mended.			
Good F	aith Efforts to Co	mply	0.0%			Da	eduction	\$0
ooou i	unin Enorts to oc		ore NOE/NOV	NOE/NOV to EDP	RP/Settleme		caaction	* -
		Extraordinary						
		Ordinary						
		N/A	Х			1		
		i i				16.111		
		Notes	ne Respond		neet the go iolation.	ood faith criteria for		
				tilis V	ioiatioi1.			
						Violation S	oubtotal	\$3,750
Econor	nic Benefit (EB) f	or this violation	n			Statutory Limit 1	Гest	
		_				-		
	Estim	ated EB Amount		\$0	,	Violation Final Penal	ty Total	\$4,145
			This vio	lation Final A	ssessed F	Penalty (adjusted for	limits)	\$4,145

	E	conomic	Benefit	Wor	rksheet		
Respondent	Campbell Sou	p Supply Company	L.L.C.				
Case ID No.	64826						
Reg. Ent. Reference No.	RN100216753	}					
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	<b>EB Amount</b>
Item Description		•					
Trom 2 ded (prior)							
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					ksheet for Violation		
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering	item (except for	one-time avoided	d 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

Respondent Campbell Soup Supply Company L.C.  Reg. Ent. Reference No. Nation 2-7-83  Media Work Outsity  Enf. Coordinator  Sananta Swell  Violation Number  Rele Cite(5)  Violation Description  Falled to compty with permitted effluent limitations, as shown in the attached effluent violation tables.  Base Penalty  \$25,000  Falled to compty with permitted effluent limitations, as shown in the attached effluent violation tables.  Base Penalty  \$25,000  Violation Description  Falled to compty with permitted effluent limitations, as shown in the attached effluent violation tables.  Base Penalty  \$25,000  **Percent**  OR Actual Act	Screen	ing Date	14-Sep-2023			<b>cet No.</b> 2023-1347-IWD-E		PCW
Reg. Ent. Reference No. RN100210753 Media Water Quality Enf. Coordinator Violation Number Rule Cite(s)  Familie No. W00001012000, Interim Effuent Limitations and Monitoring Requirements No. 1, Outfall No. 001  Violation Description  Failed to comply with permitted effletinations, as shown in the attached effluent violation tables.  Base Penalty  \$25,000  >> Environmental, Property and Human Health Matrix    Harm   Health Matrix   Harm   Health Matrix   Harm   Health Matrix   Harm   Percent   0.0%   Potential   X   Percent   30.0%   Potential   X   Percent   0.0%   Oil and grease was evaluated to determine whether the discharge amounts of pollutants exceeded professive levels. Furnan health or the environment has been exposed to insignificant amounts or pollutants with the do not exceed levels that are protective of human health or environmental receptors as a result of the violation   Number of Violation Events   317,500  Violation Events  Number of Violation Events   331   Number of violation days   Adjustment   \$17,500   \$7,500   S7,500   One quarterly event is recommended for the quarter containing the month of January 2023.   Good Faith Efforts to Comply   0.028   Large Noticity   Violation Base Penalty   \$7,500   S7,500   Large Noticity   Violation Events   30,000   Large Noticity   Violation Base Penalty   37,500   S7,500   Large Noticity   Violation Events   30,000   Large Noticity   Violation Substitute   37,500   Large Noticity   Violation Events   30,000   Large Noticity   Violation Substitute   37,500   Large Noticity   Violation Events   30,000   Large Noticity   Violation Final Penalty Total   37,500   Large Noticity   Violation Final Penalty Total   38,200   Economic Benefit (EB) for this violation   Statutory Limit Test   Violation Final Penalty Total   38,200	Res	pondent	Campbell Soup S	Supply Comp	any L.L.C.		Policy R	evision 5 (January 28, 2021)
Enf. Coordinator Samentha Smith Violation Number Rule Cite(s)  Rule Cite(s)  Rule Cite(s)  Jo Tex. Annin. Code § 305.125(1). Tex. Water Code § 26.121(a)(1), and IPDIS Permit No. W00001012000, Interim Effluent Limitations and Monitoring Requirements No. 1. Outfall No. 001  Violation Description  Falled to comply with permitted efficient limitations, as shown in the attached effluent violation tables.  Base Penalty  S25.000  >> Environmental, Property and Human Health Matrix  Harm Release Major Moderate Minor Percent 30.0%  >> Programmatic Matrix  Fastification Potential X	Cas	se ID No.	64826				PCW	Revision February 11, 2021
Enf. Coordinator Samentha Smith Violation Number Rule Cite(s)  Rule Cite(s)  Rule Cite(s)  Jo Tex. Annin. Code § 305.125(1). Tex. Water Code § 26.121(a)(1), and IPDIS Permit No. W00001012000, Interim Effluent Limitations and Monitoring Requirements No. 1. Outfall No. 001  Violation Description  Falled to comply with permitted efficient limitations, as shown in the attached effluent violation tables.  Base Penalty  S25.000  >> Environmental, Property and Human Health Matrix  Harm Release Major Moderate Minor Percent 30.0%  >> Programmatic Matrix  Fastification Potential X	Reg. Ent. Refer	ence No.	RN100216753					
Violation Number Rule Cite(s) 3 Tex. Admin. Code 5 305.125(1). Tex. Water Code 5 26.121(a)(1), and TPDES Permit No. W0000102000, Interim Effluent Limitations and Monitoring Requirements No. 1, Untal No. 201 Violation Description  Falled to Comply with permitted effluent limitations, as shown in the attached effluent wolation tables.  Base Penalty  \$ 525,000  >> Environmental, Property and Human Health Matrix  Harm Release Major Moderate Minor Percent 30.0%  >> Programmatic Matrix Faisfication Major Moderate Minor Potential Property and Human Health Matrix  Adjustment 00%  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  Violation Events  Number of Violation Events 1 31 Number of violation days  daily weekty monthly quarterly weekty weekty monthly quarterly and annual an		Media	Water Quality					
Rule Cite(s)  30 Tex. Admin. Code \$ 305. 325(1). Tex. Water Code \$ 26.121(s)(1), and TPDES Permit No. W00001012000, iterate influent Limitations and Monitoring Requirements No. 1, Outfall No. 001  Falled to comply with permitted effluent limitations, as shown in the attached offluent violation tables.  Base Penalty  \$25,000  >> Environmental, Property and Human Health Matrix Harm OR  Release Major Moderate Minor Actual	Enf. Coo	ordinator	Samantha Smith					
Permit No. W00001012000, Interim Effuent Limitations and Monitoring   Requirements No. 1, Ourfall No. 001	Violatio	on Number	3					
Permit No. W000001102000, Interim Effluent Limitations and Monitoring Requirements No. 1, Outflat No. 001	Ri	ule Cite(s)	30 Tex. Admin.	Code § 305	5.125(1). Tex. V	/ater Code § 26.121(a)(1), a	nd TPDES	
Requirements No. 1, Outfall No. 001								
Section Description							J	
Section Description				<u> </u>				
Seminarial voluntion tables   Seminarial voluntion tables   Seminarial voluntion tables	Violation D	Description	Failed to com	ply with per			ttached	
>> Environmental, Property and Human Health Matrix   Harm   Moderate   Milnor   Moderate   Milnor   Percent   30.0%					effluent violat	on tables.		
>> Environmental, Property and Human Health Matrix   Harm   Moderate   Milnor   Moderate   Milnor   Percent   30.0%								
OR Release   Major   Moderate   Minor   Moderate   Minor   Moderate   Minor   Percent   30.0%						Bas	se Penalty	\$25,000
OR Release   Major   Moderate   Minor   Moderate   Minor   Moderate   Minor   Percent   30.0%	<b>-</b>							
Release Major Moderate Minor Actual X Potential X Percent 30.0%  >>Programmatic Matrix Falsification Major Moderate Minor Falsification For Moderate Moderate Moderate For Moderate Moderate For	>> Environmenta	ai, Propei	rty and Huma		Matrix			
OR Actual Dotential X Percent 30.0%  >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Potential Protective levels. Human health or the environment has been exposed to insignificant 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  Violation Events  Number of Violation Events 1 31 Number of violation days  daily weekly		Release	Major		Minor			
Potential Percent 30.0%  >>Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0%  Matrix Notes 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 uquarterly X semiannual annual single event   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 EDPREP/Settlement Offer Extraordinary Ordinary NA X Notes The Respondent does not meet the good faith criteria for this violation.  Figure 1 20 20 20 20 20 20 20 20 20 20 20 20 20	OR			model ate				
>>Programmatic Matrix Felsification Major Moderate Minor Felsification Major Felsification Minor Felsification Major Felsification Major Felsification Major Felsification Major Felsification Major Felsification Major Felsification Minor Felsification Major Felsification Major Felsification Minor Felsification Major Felsification Minor Felsification Major Felsification Minor Felsification Major Felsification Minor Felsification Felsifica						Percent 30.0%	.]	
Adjustment   S17,500   S7,500		ļ					_	
Adjustment   S17,500   S7,500	>>Programmation	Matrix						
Matrix Notes   Dil 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	F	alsification	Major	Moderate	Minor		_	
Matrix Notes      Matrix Notes						Percent 0.0%	,	
Matrix Notes      Matrix Notes								
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	Oi	il and grease	e was evaluated t	o determine	whether the dis	scharge amounts of pollutants	s exceeded	
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  \$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 EDPRRY-Settlement Offer Extraordinary Ordinary N/A 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	Matrix p							
Adjustment \$17,500  \$7,500  Violation Events  Number of Violation Events 1 31 Number of violation days  daily weekly monthly quarterly X semiannual single event  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 50 Violation Final Penalty Total \$8,290	Notes	pollutants			•		mental	
Violation Events  Number of Violation Events  1				receptors as	a result of the	violation.		
Violation Events  Number of Violation Events  1								
Violation Events    Number of Violation Events						Adjustment	\$17,500	
Violation Events    Number of Violation Events							Т	\$7.500
Number of Violation Events 1 31 Number of violation days    daily							L	\$7,500
daily weekly monthly quarterly x x semiannual annual single event   One quarterly event is recommended for the quarter containing the month of January 2023.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A X Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$7,500  Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$0  Violation Final Penalty Total \$8,290	<b>Violation Events</b>							
daily weekly monthly quarterly x x semiannual annual single event   One quarterly event is recommended for the quarter containing the month of January 2023.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A X Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$7,500  Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$0  Violation Final Penalty Total \$8,290			_					
weekly monthly		Number of \	/iolation Events	1		31 Number of violation	n days	
weekly monthly								
Monthly   Quarterly   X   Semiannual   Semiannual   Single event   Semiannual			_					
Quarterly semiannual annual single event  One quarterly event is recommended for the quarter containing the month of January 2023.  Good Faith Efforts to Comply  O.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  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			, <u> </u>					
Semiannual annual single event  One quarterly event is recommended for the quarter containing the month of January 2023.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary N/A X  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$7,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$0  Violation Final Penalty Total \$8,290			· · · · · · · · · · · · · · · · · · ·				T	
One quarterly event is recommended for the quarter containing the month of January 2023.  Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  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				X		Violation Ba	se Penalty	\$7,500
Good Faith Efforts to Comply  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  Single event  One quarterly event is recommended for the quarter containing the month of January 2023.  Reduction  \$0  Violation Subtotal \$7,500  Violation Final Penalty Total \$8,290								
Good Faith Efforts to Comply  One quarterly event is recommended for the quarter containing the month of January 2023.  Reduction  Sometime Note of Paith Efforts to Comply  Extraordinary  Ordinary  N/A  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								
Good Faith Efforts to Comply  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			single event					
Good Faith Efforts to Comply  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								
Good Faith Efforts to Comply  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		One quarte	erly event is recor	mmended for	r the quarter co	ntaining the month of Januar	v 2023	
Extraordinary Ordinary 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		4	,		4		<i>y</i> ====:	
Extraordinary Ordinary 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								
Extraordinary Ordinary N/A  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	<b>Good Faith Effort</b>	ts to Com	ply	0.0%			Reduction	\$0
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				ore NOE/NOV	NOE/NOV to EDPF	RP/Settlement Offer	_	
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			Extraordinary					
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			Ordinary					
Violation Subtotal \$7,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$0 Violation Final Penalty Total \$8,290			N/A	Х			_	
Violation Subtotal \$7,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$0 Violation Final Penalty Total \$8,290			-	The Deepend	lant doos not no	and the good faith aritaria for	1	
Violation Subtotal \$7,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$0 Violation Final Penalty Total \$8,290			Notes	rne kespona		•		
Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$0 Violation Final Penalty Total \$8,290					tilis vit	Sidition.	]	
Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$0 Violation Final Penalty Total \$8,290			_				A T	*= - : :
Estimated EB Amount \$0 Violation Final Penalty Total \$8,290						Violatio	n Subtotal	\$7,500
Estimated EB Amount \$0 Violation Final Penalty Total \$8,290	Economic Benefit	t (EB) for	this violation	n		Statutory Limi	it Test	
	_constitut benefit	. (20) 101	Violatio	-		Julia of y Lilling		
This violation Final Assessed Penalty (adjusted for limits) \$8,290		Estimate	ed EB Amount		\$0	Violation Final Per	nalty Total	\$8,290
inis violation Final Assessed Penaity (adjusted for limits) \$8,290				TL: 1	lation Fire-! *	second Denalty (- div. )	6au 11u-14-> T	<b>#0.000</b>
	I and the second			i nis vio	iation Final As	sessed Penaity (adjusted	ior iimits)	\$8,290

	E	conomic	Benefit	Wor	ksheet		
Respondent	Campbell Sou	p Supply Company	/ L.L.C.				
Case ID No.	64826						
Reg. Ent. Reference No.	RN100216753	1					
	Water Quality					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	rtem cost	Date Required	i iiidi Bate	5	merest barea	oosis carea	LD / IIII Odi II
rtein bescription							
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					ksheet for Violation		
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering		one-time avoided	l 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)		<u> </u>		0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$0			TOTAL		\$0

		<b>Date</b> 14-Sep-2023			<b>No.</b> 2023-1347-IWD-E		PCW
	Respon	dent Campbell Soup	Supply Compan	ıy L.L.C.		Policy Revis	ion 5 (January 28, 2021)
	Case ID	<b>No.</b> 64826				PCW Re	vision February 11, 2021
Reg.	Ent. Reference	No. RN100216753					
		edia Water Quality					
		ator Samantha Smi	th				
	Violation Nu		Ĭ				
	Rule Ci			225 425(4)	110 = (1) 1 = 1 = 1 = 1 = 1		
	Kule Ci	JO TEX. 7			319.5(b) and TPDES Permit I		
		WQ00010120	00, Interim Effic		and Monitoring Requirements	5 NO. 1,	
				Outfall No. 00	)1		
		Failed to colle	ct and analyze s	samples effluent «	samples at intervals specified	d in the	
		nermit Specifi			lyze effluent samples for bio		
	Violation Descri	ntion"	•		olids during the monthly mo		
		51199511 251112	()	period of April 2			
				•			
					D	D 14	¢2F 000
					Base	Penalty	\$25,000
>> Fnv	vironmental P	roperty and Hun	nan Health M	/latriy			
LII	vii Oriinientai, Pi	operty and mun	Harm	IGUIA			
	Re	lease Major	Moderate	Minor			
OR		Actual					
		ential	Х		Percent 15.0%		
					1 121270		
>>Pro	grammatic Mat	trix					
	Falsific		Moderate	Minor			
					Percent 0.0%		
	Human	health or the environ	ment will or could	d he exposed to s	significant amounts of polluta	ants that	
					environmental receptors as		
	Notes	ot cacced levels that	•	he violation.	erry crimental receptors as	, a result	
			0	io violationi			
					Adjustment	\$21,250	
					najastment	<b>\$2.7200</b>	
							\$3,750
Violati	on Events						
	Numb	er of Violation Events	1	30	Number of violation da	ays	
		_					
		daily					
		weekly					
		monthly					
		quarterly			Violation Base	Penalty	\$3,750
		semiannual					
		annual					
		single event	X				
		_					
		One single	event is recomm	nended for the mo	onth of April 2022.		
Good F	aith Efforts to		0.0%			eduction	\$0
				IOE/NOV to EDPRP/Se	ettlement Offer		
		Extraordinary					
		Ordinary					
		N/A	X				
			T. D				
		Notes	The Responden		the good faith criteria for		
				this violati	UII.		
					Violation S	Subtotal	\$3,750
Econor	mic Benefit (EB	) for this violati	on		Statutory Limit	Test	
	Fa	timated EB Amount		\$107	Violation Final Penal	ty Total	¢ / 1 / F
	ES	umateu EB AMOUNT		Φ107	violation Final Penal	ty Total	\$4,145
			This viola	tion Final Asses	sed Penalty (adjusted for	r limits)	\$4,145

	E	conomic	Benefit	Wor	rksheet		
Respondent	Campbell Sou	p Supply Company	y L.L.C.				
Case ID No.	64826						
Reg. Ent. Reference No.	RN100216753	}					
	Water Quality						Years of
Violation No.	,					Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
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	ANNU	ALIZE avoided c	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs	\$100	30-Apr-2022	14-Sep-2023	1.38	\$7	\$100	\$107
Other (as needed)	\$100	30-Api -2022	14-3ep-2023	0.00	\$7 \$0	\$100	\$107
Notes for AVOIDED costs	Estimated		•	e effluer		ate Required is the i	
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

	Efficient violation rables									
	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	nuary 2023 53		NA							
February 2023	С	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	С

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	С	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	С	1.81
March 2023	39.32	86.5	3.89	С

 $E.\ coli$  = 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, CN601112014, Campbell Soup Supply

Classification: SATISFACTORY

Rating: 1.20

or Owner/Operator:

Company L.L.C.

RN100216753, CAMPBELL SOUP PARIS

**Classification: SATISFACTORY** 

Rating: 1.20

Regulated Entity: **Complexity Points:** 

PI ANT

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 123716 AIR NEW SOURCE PERMITS REGISTRATION 111462**  **AIR NEW SOURCE PERMITS REGISTRATION 111459 AIR NEW SOURCE PERMITS REGISTRATION 111456 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

INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD007352693

P00850

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:

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/Δ

#### **Sites Outside of Texas:**

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	8	
CONCERNING	S	TEXAS COMMISSION ON
CAMPBELL SOUP SUPPLY COMPANY	S	TEAAS COMMISSION ON
L.L.C.	§	
RN100216753	§	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") co	nsidered this agreement of the parties, resolving an enforcement
action regarding Campbell S	Soup Supply Company L.L.C (the "Respondent") under the authority
of Tex. Water Code chs. 7 at	nd 26. The Executive Director of the TCEQ, through the Enforcement
Division, and the Responde	nt 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	С	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	С

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	С	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	С	1.81
March 2023	39.32	86.5	3.89	С

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

2. 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

Campbell Soup Supply Company L.L.C DOCKET NO. 2023-1347-IWD-E Page 4

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 Campbell Soup Supply Company L.L.C DOCKET NO. 2023-1347-IWD-E Page 5

#### 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.

Campbell Soup Supply Company L.L.C DOCKET NO. 2023-1347-IWD-E Page 6

Campbell Soup Supply Company L.L.C.

# SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
Kriote Melo-Jurack For the Executive Director	11/10/2025
For the Executive Director	Date
I, the undersigned, have read and understand the at the attached Order, and I do agree to the terms and acknowledge that the TCEQ, in accepting payment for on such representation.	conditions specified therein. I further
I also understand that failure to comply with the Or and/or failure to timely pay the penalty amount, ma	dering Provisions, if any, in this Order ay result in:
<ul> <li>A negative impact on compliance history;</li> <li>Greater scrutiny of any permit applications su</li> <li>Referral of this case to the OAG for contempt, and/or attorney fees, or to a collection agency</li> <li>Increased penalties in any future enforcement</li> <li>Automatic referral to the OAG of any future en</li> <li>TCEQ seeking other relief as authorized by law</li> </ul>	injunctive relief, additional penalties, ; actions; nforcement actions; and
In addition, any falsification of any compliance doctors of any compliance doctors.  Signature	uments may result in criminal prosecution.  7/22/2025  Date
Name (Printed or typed) Authorized Representative of	Enterprise Transformation Officer Title

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