Order Type:

1660 Agreed Order

Findings Order Justification:

N/A **Media:** IHW

Small Business:

No

Location(s) Where Violation(s) Occurred:

Medical Center of Plano, 3901 West 15th Street, Plano, Collin County

Type of Operation:

Hospital

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: September 19, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$37,575

Amount Deferred for Expedited Settlement: \$7,515

Total Paid to General Revenue: \$30,060 **Total Due to General Revenue:** \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - High Site/RN - High

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: November 21, 2023

Date(s) of NOE(s): November 21, 2023

Violation Information

- 1. Failed to update the Notice of Registration ("NOR"). Specifically, the Facility's NOR was not updated to include a new waste stream for lead aprons, and the Environmental Protection Agency ("EPA") waste codes D010, D011, D022, P075, U002, U059, U129, and U150 for Texas Waste Code ("TWC") 0001004H [30 Tex. Admin. Code § 335.6(b)].
- 2. Failed to submit to the Executive Director a complete and correct Annual Waste Summary ("AWS") detailing the management of each hazardous and Class I waste generated on-site during the reporting calendar year. Specifically, the Respondent did not submit the AWS for the years 2021 and 2022. Also, the AWS for the year 2020 listed incorrect quantities of hazardous wastes generated, incorrect waste management codes, and incorrect TWCs [30 Tex. ADMIN. CODE § 335.9(a)(2)].
- 3. Failed to prepare a five-year pollution prevention plan and maintain it on-site and make it available to Commission personnel for inspection [30 Tex. ADMIN. CODE § 335.474(1)].
- 4. Failed to maintain hazardous waste containers closed in a satellite accumulation area ("SAA") except when adding, removing, or consolidating waste. Specifically, two SAA containers were observed to have been left open when not in use by Facility staff [30 Tex. ADMIN. CODE § 335.53(d) and 40 CODE OF FEDERAL REGULATIONS ("CFR") § 262.15(a)(4)(i)].
- 5. Failed to mark or label containers with an indication of the hazards of the contents. Specifically, three SAA containers were missing labels that indicated the hazards of the containers [30 Tex. Admin. Code § 335.53(d) and 40 CFR § 262.15(a)(5)(ii)].
- 6. Failed to include a TWC for each hazardous waste itemized on a manifest. Specifically, multiple manifests were provided for review that indicated that the itemized hazardous wastes did not include a corresponding TWC for each hazardous waste on each manifest [30 Tex. ADMIN. CODE § 335.10(a)(1) and 40 CFR § 262.20(a)(1)].
- 7. Failed to submit an exception report for not receiving a copy of a manifest with the handwritten signature of the owner or operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter. Specifically, the Facility did not have copies of the hazardous waste manifests from designated facilities and had not submitted exception reports for Manifest Nos. 014006599FLE, 014006498FLE, 014006409FLE, 015108033FLE, 015108087FLE, 014962376FLE, 014962026FLE, 015947271FLE, 015947273FLE, 015947123FLE, 015947081FLE, 015946891FLE, and 014006662FLE in 2021; and for Manifest Nos. 014963029FLE, 014963142FLE, 014963067FLE, 015944758FLE, 015623261FLE, 015623207FLE, 015623144FLE, 015623080FLE, 015622975FLE, 015622297FLE, 015622237FLE, 015622179FLE, 015622147FLE, 015622078FLE, 017506087FLE, 017506037FLE,

017505851FLE, 017505801FLE, 017511609FLE, 015621396FLE, 015621277FLE, 015621211FLE, 015621129FLE, 015621079FLE, 015621036FLE, 015620973FLE, 015620913FLE, 015623359FLE, 015623312FLE, 015944758FLE, 015944667FLE, 015944579FLE, 017505755FLE, 017505630FLE, 015621958FLE, 014963459FLE, and 014963233FLE in 2022 [30 Tex. ADMIN. CODE § 335.56 and 40 CFR § 262.42(a)(2)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days:
- i. Update the Facility's NOR to include the new lead apron waste stream and missing EPA waste codes;
- ii. Develop and implement procedures to ensure that the AWS is submitted timely;
- iii. Complete and submit the AWS for the 2021 and 2022 calendar years and submit a corrected 2020 AWS;
- iv. Prepare a five-year Pollution Prevention Plan and maintain it on-site and make it available to Commission personnel for inspection;
- v. Securely close the two SAA containers containing hazardous waste;
- vi. Label the three SAA containers indicating the hazards of the contents; and
- vii. Develop and implement procedures to ensure that TWCs will be included on all manifests in the future.
- b. Within 60 days:
- i. List the correct TWC for each hazardous waste listed per manifest; and
- ii. Submit 50 signed manifest copies not received.
- c. Within 75 days, submit written certification to demonstrate compliance with a. and b.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Stephanie McCurley, Enforcement Division,

Enforcement Team 3, MC 219, (512) 239-2607; Michael Parrish, Enforcement Division,

MC R-12, (512) 239-2548

Respondent: Samuel N. Hazen, President, COLUMBIA MEDICAL CENTER OF PLANO

SUBSIDIARY, L.P., P.O. Box 570, Nashville, Tennessee 37202

Elizabeth Johnsen, Chief Operating Officer, COLUMBIA MEDICAL CENTER OF PLANO

SUBSIDIARY, L.P., P.O. Box 570, Nashville, Tennessee 37202

Respondent's Attorney: N/A



PAYABLE PENALTY

Penalty Calculation Worksheet (PCW)

SANTONNIENTAL CO	Policy R	evision 5 (January 28	3, 2021)				PCW Rev	ision February 11, 202
DATES	Assigned	27-Nov-2023						
	PCW	18-Mar-2024	Screening	11-Dec-2023	EPA Due			
DESDO	NDENT/FACILI	TY INFORMATI	ON					
KLJFO		COLUMBIA MED		OF PLANO SUF	SIDIARY, L.P.			
Reg	g. Ent. Ref. No.	RN102450277		0				
Facili	ty/Site Region	4-Dallas/Fort Wo	orth		Major/	Minor Source	Major	
0465 1	NEODRAATION							
	NFORMATION f./Case ID No.	45104			No	of Violations	7	
LII		2023-1729-IHW	-E		NO.	Order Type		
Med		Industrial and H		ste	Governmer	nt/Non-Profit		
	Multi-Media				Enf		Stephanie McC	
			**			EC's Team	Enforcement T	eam 3
Adn	nin. Penaity \$ i	_imit Minimum	\$0	Maximum	\$25,000			
			Donali	n. Calaula	tion Coot	lon		
				y Calcula		ion	-	
TOTAI	L BASE PENA	LTY (Sum of	violation	base penal	ties)		Subtotal 1	\$41,750
VD II I	CTMENITO (.	/-) TO SUBT	TAL 1					
ADJU.	Subtotals 2-7 are of	otained by multiplying	THE Total Base	Penalty (Subtotal 1) by the indicated	percentage.		
	Compliance Hi		,	-10.0%	Adjustment	Subto	tals 2, 3, & 7	-\$4,175
		_					-	
	Notes	R	eduction for I	High Performer	classification.			
	ļ							
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Natas	The De	anandant daa	a mat maaat tha	aulmahilitu ari:	torio		
	Notes	ine ke	spondeнт doe	s not meet the	culpability cri	teria.		
	l						J	
	Good Faith Effe	ort to Comply T	otal Adjustn	nents			Subtotal 5	\$0
	Economic Bene	efit		0.0%	Enhancement*		Subtotal 6	\$(
		Total EB Amounts	\$1,046		d at the Total EB \$	\$ Amount	_	·
	Estimated	Cost of Compliance	\$8,535					
SUM (OF SUBTOTAL	I S 1-7				F	inal Subtotal	\$37,575
00						•	mar cabician [7 - 1 - 1
OTHE	R FACTORS A	AS JUSTICE N	MAY REQUI	IRE	0.0%		Adjustment	\$0
Reduces c	or enhances the Final	Subtotal by the indi	cated percentage	٠.			, ,	
	Notes							
	ļ					Final Per	nalty Amount	\$37,575
						i mar i ci	iaity Airiodin [Ψ07,070
STATI	JTORY LIMIT	T ADJUSTMEN	NT			Final Asse	ssed Penalty	\$37,575
DEFER					20.0%	Reduction	Adjustment	-\$7,515
Reduces t	he Final Assessed Pe	enalty by the indicate	d percentage.				1	
	Notes		Deferral offer	ed for expedited	d sattlamant			
	Notes		beleft at offere	ed for expedited	a settierrierit.		I	

\$30,060

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Screening Date 11-Dec-2023

Docket No. 2023-1729-IHW-E

Respondent COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P.

Case ID No. 65106

Reg. Ent. Reference No. RN102450277

Media Industrial and Hazardous Waste

Enf. Coordinator Stephanie McCurley

		0" F	Compliance History Worksheet			
>> Co	mpliance Hist Component	Number o	hancement (Subtotal 2)	Number	Adjust.	
	NOVs	Written no	cices of violation ("NOVs") with same or similar violations as those in enforcement action (number of NOVs meeting criteria)	0	0%	
		Other writt	en NOVs	0	0%	
			I final enforcement orders containing a denial of liability (<i>number of ting criteria</i>)	0	0%	
	Orders	without a	icated final enforcement orders, agreed final enforcement orders denial of liability, or default orders of this state or the federal t, or any final prohibitory emergency orders issued by the commission	0	0%	
	Judgments and Consent	of liability	ljudicated final court judgments or consent decrees containing a denial of this state or the federal government (number of judgments or crees meeting criteria)	0	0%	
	Decrees	final court	cated final court judgments and default judgments, or non-adjudicated judgments or consent decrees without a denial of liability, of this state ral government		0%	
	Convictions	Any crimin counts)	al convictions of this state or the federal government (number of	0	0%	
	Emissions	Chronic exc	essive emissions events (number of events)	0	0%	
	Audits	Texas Envi	fying the executive director of an intended audit conducted under the ronmental, Health, and Safety Audit Privilege Act, 74th Legislature, ber of audits for which notices were submitted)	0	0%	
	Addits		of violations under the Texas Environmental, Health, and Safety Audit ct, 74th Legislature, 1995 (<i>number of audits for which violations were</i>	0	0%	
		1		T	1	
		Environme	ntal management systems in place for one year or more	No	0%	
	Other	_	on-site compliance assessments conducted by the executive director ecial assistance program	No	0%	
		Participatio	n in a voluntary pollution reduction program	No	0%	
			liance with, or offer of a product that meets future state or federal t environmental requirements	No	0%	
			Adjustment Pe	rcentage (Sub	total 2)	0%
>> R e	peat Violator	(Subtotal 3				
	No		Adjustment Pe	rcentage (Sub	total 3)	0%
>> Co	mpliance Hist	ory Person	Classification (Subtotal 7)			
	High Perf	ormer	Adjustment Pe	rcentage (Sub	total 7)	-10%
>> Co	mpliance Hist	ory Summa	nry			
	Compliance History Notes		Reduction for High Performer classification.			
Fi	ol Compliant	Llictory A-	Total Compliance History Adjustment Percentage (Subtotals 2,	3, & 7) [-10%
>> FINE	al Compliance	mistory Ad	Final Adjustment Percent	age *capped	at 100%	-10%

		11-Dec-2023		Docke	t No. 2023-1729-II	HW-E	PCW
	Respondent	COLUMBIA ME	DICAL CENTER	OF PLANO SUB	SIDIARY, L.P.	Policy R	evision 5 (January 28, 2021)
	Case ID No.	65106				PCW	/ Revision February 11, 2021
Reg.	Ent. Reference No.	RN102450277					
	Media	Industrial and	Hazardous Wa	ste			
	Enf. Coordinator	Stephanie Mc0	Curley				
	Violation Number	1					
	Rule Cite(s)						
			30 1	Tex. Admin. Code	e § 335.6(b)		
		Failed to un	date the Notice	of Registration	("NOR"). Specifically	v the Facility's	
					ste stream for lead a		
	Violation Description				ste codes D010, D0		
		U002, U0	59, U129, and	U150 for Texas	Waste Code ("TWC")	0001004H.	
						B B	¢2F 000
						Base Penalty	\$25,000
>> Env	vironmental, Propei	rtv and Hun	nan Health	Matrix			
			Harm				
	Release	Major	Moderate	Minor			
OR	Actual						
	Potential				Percent	0.0%	
D	anamanatia Matrix						
>>Pro	grammatic Matrix Falsification	Major	Modorato	Minor			
	Faisilication	Major X	Moderate	Minor	Percent 2	20.0%	
		^			rercent 2	.0.076	
	Matrix	10	00% of the rule	requirement wa	s not met		
	Notes	10	70 70 OF THE TUIC	requirement we	s not met.		
					Adjustment	\$20,000	
							\$5,000
Violati	on Events						
Violati	on Events						
Violati		iolation Events	s 1		Number of vio	olation days	
Violati		iolation Events	3 1		20 Number of vi	olation days	
Violati		iolation Events	1		20 Number of vio	plation days	
Violati			1		20 Number of vio	plation days	
Violati		daily weekly monthly	1				
Violati		daily weekly monthly quarterly	1			olation days on Base Penalty	\$5,000
Violati		daily weekly monthly quarterly semiannual	1				\$5,000
Violati		daily weekly monthly quarterly semiannual annual					\$5,000
Violati		daily weekly monthly quarterly semiannual	\$ 1				\$5,000
Violati		daily weekly monthly quarterly semiannual annual					\$5,000
Violati		daily weekly monthly quarterly semiannual annual	X		Violatio		\$5,000
Violati		daily weekly monthly quarterly semiannual annual	X	vent is recomme	Violatio		\$5,000
	Number of V	daily weekly monthly quarterly semiannual annual single event	x One single e		Violatio	n Base Penalty	
		daily weekly monthly quarterly semiannual annual single event	x One single e	vent is recomme	Violatio ended.		\$5,000 \$5,000
	Number of V	daily weekly monthly quarterly semiannual annual single event	X One single e 0.0% Before NOE/NOV		Violatio ended.	n Base Penalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e	vent is recomme	Violatio ended.	n Base Penalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary	One single e	vent is recomme	Violatio ended.	n Base Penalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e	vent is recomme	Violatio ended.	n Base Penalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e	vent is recomme	Violatio ended.	n Base Penalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary	One single e	vent is recomme	Violation violat	n Base Penalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e	vent is recomme	Violation violat	n Base Penalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e	vent is recomme	Violation Violat	Reduction	\$0
Good F	Number of V	daily weekly monthly quarterly semiannual annual single event	X One single e 0.0% Before NOE/NOV X The Respond	vent is recomme	Violatio Pended. Settlement Offer Peet the good faith criplation.	Reduction teria	
Good F	Number of V	daily weekly monthly quarterly semiannual annual single event	X One single e 0.0% Before NOE/NOV X The Respond	vent is recomme	Violatio Pended. Settlement Offer Peet the good faith criplation.	Reduction	\$0
Good F	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e O.0% Before NOE/NOV X The Respond	vent is recomme NOE/NOV to EDPRPA dent does not me for this vice	Violation Violation Violation Vio	Reduction teria lation Subtotal Limit Test	\$5,000
Good F	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e O.0% Before NOE/NOV X The Respond	vent is recomme	Violation Violation Violation Vio	Reduction teria	\$0
Good F	Number of V	daily weekly monthly quarterly semiannual annual single event	One single e	NOE/NOV to EDPRPA	Violation Violation Violation Vio	Reduction teria lation Subtotal Limit Test	\$5,000

Economic Benefit Worksheet										
Respondent	COLUMBIA ME	EDICAL CENTER O	F PLANO SUBSII	DIARY, I	L.P.					
Case ID No.	65106									
Rea. Ent. Reference No.		,								
1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	Industrial and	Hazardous Waste)			Percent Interest	Years of Depreciation			
Violation No.	1					5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item Description		Date Required	i iilai Date	113	Titlerest Saveu	Costs Saveu	LD AIIIOUIT			
rtem bescription										
Delayed Costs										
Equipment		1		0.00	\$0	\$0	\$0			
Buildings				0.00	\$0 \$0	\$0 \$0	\$0			
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0			
Engineering/Construction				0.00	\$0	\$0	\$0			
Land				0.00	\$0	n/a	\$0			
Record Keeping System	\$250	13-Apr-2023	22-Sep-2025	2.45	\$31	n/a	\$31			
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	missing EP	'A waste codes. T	he Date Require estimate	d is the	initial investigation of compliance.	w lead apron waste n date and the Fina	Date is the			
Avoided Costs	ANNU	ALIZE avoided of	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			
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) Notes for AVOIDED costs		JI		0.00	\$0	\$0	\$0			
Approx. Cost of Compliance		\$250			TOTAL		\$31			

	Screening Date				t No. 2023-1729-IHW-E		PCW
	Respondent	COLUMBIA ME	DICAL CENTER	OF PLANO SUBS	IDIARY, L.P.	Policy R	evision 5 (January 28, 2021)
	Case ID No.					PCW	/ Revision February 11, 2021
Reg.	Ent. Reference No.	RN102450277					
	Media	Industrial and	Hazardous Was	te			
	Enf. Coordinator		urley				
	Violation Number	2					
	Rule Cite(s)		30 Te	ex. Admin. Code	§ 335.9(a)(2)		
					- (,,,		
		Failed to sub	omit to the Exec	cutive Director a	complete and correct Annual	Waste	
					of each hazardous and Class		
	Violation Description				ar year. Specifically, the Res		
	•			•	nd 2022. Also, the AWS for t	-	
		2020 listed	•	ment codes, and	s wastes generated, incorrect incorrect TWCs	waste	
			manage	morre occuss, and			
					D	D I T	¢25.000
					Base	Penalty	\$25,000
>> En	vironmental, Prope	rty and Hun	nan Health I	Matrix			
		og and man	Harm				
	Release	Major	Moderate	Minor			
OR	Actual						
	Potential				Percent 0.0%		
_							
>>Pro	grammatic Matrix	NA-:	N 4 = -1 = + -	NAI			
	Falsification	Major	Moderate	Minor	Doroont 30.00/		
		Х			Percent 20.0%		
	Matrix	1	00% of the rule	requirement wa	s not met		
	Notes	.,	5076 of the fale	requirement wa	3 Hot met.		
					Adjustment	\$20,000	
					-		
						Ī	\$5,000
						_	
Vielet:	on Francis					_	
Violati	on Events						
Violati		/iolation Events	3		Number of violation d	avs	
Violati		iolation Events/	3		Number of violation d	ays	
Violati			3		Number of violation d	ays	
Violati		/iolation Events daily weekly	3		Number of violation d	ays	
Violati		daily	3		Number of violation d	ays	
Violati		daily weekly	3		Number of violation d Violation Base		\$15,000
Violati		daily weekly monthly	3				\$15,000
Violati		daily weekly monthly quarterly semiannual annual	3				\$15,000
Violati		daily weekly monthly quarterly semiannual	3 				\$15,000
Violati		daily weekly monthly quarterly semiannual annual					\$15,000
Violati	Number of \	daily weekly monthly quarterly semiannual annual single event	X	<u> </u>		Penalty	\$15,000
Violati	Number of \	daily weekly monthly quarterly semiannual annual single event	x mmended (one	<u> </u>	Violation Base	Penalty	\$15,000
Violati	Number of \	daily weekly monthly quarterly semiannual annual single event	x mmended (one	for each AWS tha	Violation Base	Penalty	\$15,000
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event	x mmended (one complet	for each AWS tha	Violation Base at was not submitted, admini	Penalty	\$15,000 \$0
	Number of \	daily weekly monthly quarterly semiannual annual single event	x mmended (one complet	for each AWS tha	Violation Base at was not submitted, adminis	Penalty	
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event	x nmended (one complet 0.0% Before NOE/NOV	for each AWS thate, or inaccurate)	Violation Base at was not submitted, adminis	Penalty	
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event	x mmended (one complet 0.0% Before NOE/NOV	for each AWS thate, or inaccurate)	Violation Base at was not submitted, adminis	Penalty	
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor	x mmended (one complet 0.0% Before NOE/NOV	for each AWS thate, or inaccurate)	Violation Base at was not submitted, adminis	Penalty	
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor	x mmended (one complet 0.0% Before NOE/NOV	for each AWS thate, or inaccurate)	Violation Base at was not submitted, adminis	Penalty	
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor	x mmended (one complet 0.0% Before NOE/NOV x The Responde	for each AWS thate, or inaccurate) NOE/NOV to EDPRP/	Violation Base at was not submitted, adminis . Settlement Offer t the good faith criteria for	Penalty	
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary	x mmended (one complet 0.0% Before NOE/NOV x The Responde	for each AWS thate, or inaccurate)	Violation Base at was not submitted, adminis . Settlement Offer t the good faith criteria for	Penalty	
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary	x mmended (one complet 0.0% Before NOE/NOV x The Responde	for each AWS thate, or inaccurate) NOE/NOV to EDPRP/	Violation Base at was not submitted, adminis . Settlement Offer t the good faith criteria for tion.	Penalty stratively deduction	\$0
	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary	x mmended (one complet 0.0% Before NOE/NOV x The Responde	for each AWS thate, or inaccurate) NOE/NOV to EDPRP/	Violation Base at was not submitted, adminis . Settlement Offer t the good faith criteria for	Penalty stratively deduction	
Good F	Number of \ Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A	x nmended (one complet 0.0% Before NOE/NOV x The Responde	for each AWS thate, or inaccurate) NOE/NOV to EDPRP/	Violation Base at was not submitted, adminis . Settlement Offer t the good faith criteria for tion. Violation	Penalty Stratively Seduction	\$0
Good F	Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A Notes	x mmended (one complet 0.0% Before NOE/NOV X The Responde	for each AWS thate, or inaccurate) NOE/NOV to EDPRP/ ent does not mee this viola	Violation Base at was not submitted, administration. Settlement Offer t the good faith criteria for tion. Violation is	Penalty stratively eduction Subtotal	\$0
Good F	Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A	x mmended (one complet 0.0% Before NOE/NOV X The Responde	for each AWS thate, or inaccurate) NOE/NOV to EDPRP/	Violation Base at was not submitted, adminis . Settlement Offer t the good faith criteria for tion. Violation	Penalty stratively eduction Subtotal	\$0
Good F	Three single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A Notes	x nmended (one complet 0.0% Before NOE/NOV X The Responde	for each AWS thate, or inaccurate) NOE/NOV to EDPRP/ ent does not mee this viola	Violation Base at was not submitted, administration. Settlement Offer t the good faith criteria for tion. Violation is	Penalty stratively deduction Subtotal Test Ity Total	\$0 \$15,000

Economic Benefit Worksheet									
		DICAL CENTER O	F PLANO SUBSID	DIARY, I	L.P.				
Case ID No.									
Reg. Ent. Reference No.									
Media Violation No.		Hazardous Waste				Percent Interest	Years of Depreciation		
						5.0	15		
	Item Cost	Date Required	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		12 4 2022	22 C 2025	0.00	\$0	n/a	\$0		
Record Keeping System Training/Sampling	\$500	13-Apr-2023	22-Sep-2025	2.45 0.00	\$61 \$0	n/a n/a	\$61 \$0		
Remediation/Disposal				0.00	\$0 \$0	n/a	\$0 \$0		
Permit Costs				0.00	\$0 \$0	n/a	\$0 \$0		
Other (as needed)	\$1,135	1-Apr-2023	22-Sep-2025	2.48	\$141	n/a	\$141		
Notes for DELAYED costs	Estimated del	ayed cost to comp	olete and submit). The Date Requ	complia the AV uired is	ance. /S for the 2021 an	al Date is the estim ad 2022 calendar ye AWS was due and th	ars and submit		
Avoided Costs	ANNU	ALIZE avoided c	osts before en	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 \$0	\$0		
Other (as needed)		1		0.00	30	30	\$0		
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$1,635			TOTAL		\$202		

		11-Dec-2023		et No. 2023-1729-IHW-E		PCW
	Respondent	COLUMBIA MEDICAL CE	INTER OF PLANO SUBS	SIDIARY, L.P.	Policy R	evision 5 (January 28, 2021)
	Case ID No.	65106			PCW	Revision February 11, 2021
Rea	Ent. Reference No.	RN102450277				
Rog.		Industrial and Hazardou	ıs Masta			
			is waste			
	Enf. Coordinator					
	Violation Number	3				
	Rule Cite(s)		30 Tex. Admin. Code	8 335 474(1)		
			30 TCX. Admin. Code	3 333.474(1)		
		Failed to prepare a fiv	e-vear pollution preve	ntion plan and maintain it on-	site and	
	Violation Description			personnel for inspection.		
				Rase	Penalty	\$25,000
				Dase	renaity	\$23,000
>> Fnv	vironmental, Prope	rty and Human He	alth Matrix			
LIIV	in offinerital, Froper	Hari				
	Release	Major Moder				
OR	Actual					
O.K	Potential			Percent 0.0%		
	Potential			Percent 0.0%		
	uma ma ma catila Baratari					
>>Prog	grammatic Matrix	Mai	oto Mi			
	Falsification	Major Moder	ate Minor	D		
		Х		Percent 20.0%		
	Matrix					
	Matrix Notes	100% of the	ne rule requirement w	as not met.		
	Notes					
				Adjustment	\$20,000	
						\$5,000
Violatio	on Events					
	Number of \	/iolation Events 1		20 Number of violation d	ays	
	Number of \	/iolation Events 1		Number of violation d	lays	
	Number of \	/iolation Events 1		20 Number of violation d	ays	
	Number of \			20 Number of violation d	lays	
	Number of \	daily		20 Number of violation d	lays	
	Number of \	daily weekly monthly				\$5,000
	Number of \	daily weekly monthly quarterly		Number of violation d		\$5,000
	Number of \	daily weekly monthly quarterly semiannual				\$5,000
	Number of \	daily weekly monthly quarterly semiannual annual				\$5,000
	Number of \	daily weekly monthly quarterly semiannual				\$5,000
	Number of \	daily weekly monthly quarterly semiannual annual				\$5,000
	Number of \	daily weekly monthly quarterly semiannual annual single event x	Ingle event is recomm	Violation Base		\$5,000
	Number of \	daily weekly monthly quarterly semiannual annual single event x	ingle event is recomm	Violation Base		\$5,000
	Number of \	daily weekly monthly quarterly semiannual annual single event x	ingle event is recomm	Violation Base		\$5,000
Good		daily weekly monthly quarterly semiannual annual single event One s		Violation Base ended.	Penalty	
Good F	Number of \	daily weekly monthly quarterly semiannual annual single event One s	.0%	Violation Base ended.		\$5,000 \$0
Good F		daily weekly monthly quarterly semiannual annual single event One s	.0%	Violation Base ended.	Penalty	
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Before NOE Extraordinary	.0%	Violation Base ended.	Penalty	
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Extraordinary Ordinary	.0%	Violation Base ended.	Penalty	
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Before NOE Extraordinary	.0%	Violation Base ended.	Penalty	
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Ordinary Ordinary N/A X	.0% /NOV NOE/NOV to EDPRE	Violation Base ended. R /Settlement Offer	Penalty	
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Ordinary Ordinary N/A X	.0% /NOV NOE/NOV to EDPRF	Violation Base ended. /Settlement Offer et the good faith criteria for	Penalty	
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Cylinary Ordinary N/A The Res	.0% /NOV NOE/NOV to EDPRE	Violation Base ended. /Settlement Offer et the good faith criteria for	Penalty	
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Cylinary Ordinary N/A The Res	.0% /NOV NOE/NOV to EDPRF	ended. /Settlement Offer et the good faith criteria for ation.	Penalty	\$0
Good F		daily weekly monthly quarterly semiannual annual single event One s Ply Cylinary Ordinary N/A The Res	.0% /NOV NOE/NOV to EDPRF	Violation Base ended. /Settlement Offer et the good faith criteria for	Penalty	
	aith Efforts to Com	daily weekly monthly quarterly semiannual annual single event One s Ply Ordinary Ordinary N/A X Notes The Res	.0% /NOV NOE/NOV to EDPRF	violation Base ended. /Settlement Offer et the good faith criteria for ation. Violation	Penalty Penalt	\$0
		daily weekly monthly quarterly semiannual annual single event One s Ply Ordinary Ordinary N/A X Notes The Res	.0% /NOV NOE/NOV to EDPRF	ended. /Settlement Offer et the good faith criteria for ation.	Penalty Penalt	\$0
	aith Efforts to Com	daily weekly monthly quarterly semiannual annual single event One s Ply Ordinary Ordinary N/A X Notes The Res	.0% /NOV NOE/NOV to EDPRF	violation Base ended. /Settlement Offer et the good faith criteria for ation. Violation	Penalty Deduction Subtotal Test	\$0
	aith Efforts to Com	daily weekly monthly quarterly semiannual annual single event One s Ply Companies C	NOV NOE/NOV to EDPRE	violation Base ended. //Settlement Offer et the good faith criteria for ation. Violation : Statutory Limit Violation Final Pena	Penalty Reduction Subtotal Test Ity Total	\$5,000 \$5,000 \$4,500
	aith Efforts to Com	daily weekly monthly quarterly semiannual annual single event One s Ply Companies C	NOV NOE/NOV to EDPRE	ended. Violation Base ended. Violation Base Violation Base	Penalty Reduction Subtotal Test Ity Total	\$5,000

Economic Benefit Worksheet										
Respondent	COLUMBIA ME	DICAL CENTER O	F PLANO SUBSII	DIARY, I	P.					
Case ID No.	65106									
Rea. Ent. Reference No.	RN102450277									
		Hazardous Waste	<u>,</u>				Years of			
Violation No.		riazar adas waste	•			Percent Interest	Depreciation			
Violation No.	5					5.0	15			
	14 04	Data Damaina d	First Data	V	1					
	Item Cost	Date Required	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)	\$1,000	13-Apr-2023	22-Sep-2025	2.45	\$122	n/a	\$122			
						nd maintain it on-si				
Notes for DELAYED costs	available to	•	•		e Date Required is ated date of compl	the initial investiga	tion date and			
					<u>'</u>					
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		\$1,000			TOTAL		¢122			
					IOIAL		\$122			

				This viola	ation Final Ass	sessed Penalty (adjusted	for limits)	\$1,575
		_5,,,,,,,,						·
		Estimate	ed EB Amount		\$2	Violation Final Pe	nalty Total	\$1,575
Econor	nic Bene	efit (EB) for	this violation	1		Statutory Lim	it Test	
			<u> </u>			Violatio	⊒ on Subtotal	\$1,750
			Notes T	he Responde	ent does not me this viol	et the good faith criteria for lation.	-	
			N/A	Х			-	
			Ordinary					
			Befo Extraordinary	ore NOE/NOV	NOE/NOV to EDPRE	P/Settlement Offer		
Good F	aith Effo	orts to Com		0.0%			Reduction	\$0
				One single e	vent is recomm	ended.		
			annual single event	Х				
			quarterly semiannual			Violation Ba	ise Penalty	\$1,750
			weekly monthly					
			daily					
		Number of \	/iolation Events	1		20 Number of violation	n days	
Violati	on Event	ts						
								\$1,750
						Adjustment	\$23,250	
	Notes	that would no	ot exceed levels th	•	ctive of human l of the violation	nealth or environmental rec	eptors as a	
	Matrix				•	to insignificant amounts of		
		. distribution	Major	oddrate	IVIII IOI	Percent 0.0%	6	
>>Pro	gramma	tic Matrix Falsification	Major	Moderate	Minor			
		Potential			Х	Percent 7.0%	6	
OR		Release Actual	Major	Moderate	Minor		_	
>> EN	vironme	_	rty and Huma	Harm				
Fr.	vironm =	ntal Drave	rty and Lluma	n Hoolth	Matrix	Da	oc i enany	\$25,000
						Do	se Penalty	\$25,000
			two SAA conta	diriers were c	Facility st	•	ii use by	
	Violatio	n Description	area ("SAA") ex	cept when a	dding, removing	g, or consolidating waste. Some been left open when not it	pecifically,	
			Failed to maint	ain hazardou	ıs waste contair	ners closed in a satellite acc	umulation	
		Rule Cite(s)	30 Tex. Admir	n. Code § 33!	5.53(d) and 40 § 262.15(a)	Code of Federal Regulations (4)(i)	s ("CFR")	
		ation Number	4					
_	Enf C		Industrial and Has Stephanie McCurl		te			
Reg.			RN102450277				PCW	/ Revision February 11, 2021
		espondent ase ID No.	COLUMBIA MEDIO	CAL CENTER	OF PLANO SUB	SIDIARY, L.P.		evision 5 (January 28, 2021)
	Scre	ening Date	11-Dec-2023		DOCK	et No . 2023-1729-IHW-E		PCW

Economic Benefit Worksheet										
Respondent	COLUMBIA ME	EDICAL CENTER O	F PLANO SUBSII	IARY, I	L.P.					
Case ID No.	65106									
Rea. Ent. Reference No.		7								
		Hazardous Waste	•			Percent Interest	Years of			
Violation No.	4						Depreciation			
						5.0	15			
	Item Cost	Date Required	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)	\$20	13-Apr-2023	22-Sep-2025	2.45	\$2	n/a	\$2			
		,	•			ng hazardous waste				
Notes for DELAYED costs	container).	The Date Require		_		inal Date is the esti	mated date of			
				complia	ance.					
Avoided Costs	ANNU	ALIZE avoided o	osts before en	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		\$20			TOTAL		\$2			

	Screening Date				et No. 2023-1729-IHW-E		PCW
		COLUMBIA MEDI	CAL CENTER (OF PLANO SUBS	IIDIARY, L.P.	Policy Re	evision 5 (January 28, 2021)
	Case ID No.	65106				PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN102450277					
	Media	Industrial and Ha	azardous Wast	e			
	Enf. Coordinator	Stephanie McCur	ley				
	Violation Number	5					
	Rule Cite(s)	30 Tev	Admin Code	6 335 53(d) at	nd 40 CFR § 262.15(a)(5)(ii)		
		30 16%	t. Admin. Code	2 3 333:33(d) di	10 40 01 K 3 202.13(d)(3)(ll)		
		Failed to mark o	r label contain	ners with an indi	ication of the hazards of the c	ontents.	
	Violation Description	Specifically, thre	ee SAA contair	ners were missir	ng labels that indicated the ha	zards of	
				the contain	ers.		
					Base	Penalty	\$25,000
Г	deservated Deserva		om Iloolah N	// admits			
>> En\	vironmental, Prope	rty and Huma	an Health II Harm	латгіх			
	Release	Major	Moderate	Minor			
OR	Actual						
	Potential				Percent 0.0%		
>>Pro	grammatic Matrix						
	Falsification	Major	Moderate	Minor			
		Х			Percent 20.0%		
	Matrix						
	Notes	100	% of the rule	requirement wa	as not met.		
					Adjustment	\$20,000	
					Adjustment	\$20,000	
							\$5,000
Violation	on Events						
	Number of V	/iolotion Events	1		Number of violation d	0.40	
	Number of v	Violation Events	I		Number of violation d	ays	
		daily					
		weekly					
		monthly	х				
		quarterly			Violation Base	Penalty	\$5,000
		semiannual					
		annual					
		single event					
	One month	nly event is recom	nmended from	the November	21, 2023 record review date t	o the	
			December 11	, 2023 screening	g date.		
Good F	aith Efforts to Com	vla	0.0%		R	eduction	\$0
				IOE/NOV to EDPRP/			
		Extraordinary					
		Ordinary					
		N/A	х				
		Ĭ,	The Decrease	at door not ma	at the good faith aritaria for		
		Notes 1	me kesponder	nt does not mee this viola	et the good faith criteria for		
				tilis viola	ation.		
							*=
					Violation S	bubtotal	\$5,000
Econor	nic Benefit (EB) for	this violation	n		Statutory Limit	Test	
					-		
	Estimat	ed EB Amount		\$4	Violation Final Penal	ty Total	\$4,500
			This viola	tion Final Asse	essed Penalty (adjusted for	r limits)	\$4,500

Economic Benefit Worksheet										
Respondent	COLUMBIA ME	DICAL CENTER O	F PLANO SUBSII	DIARY, I	L.P.					
Case ID No.	65106									
Rea. Ent. Reference No.	RN102450277									
		Hazardous Waste	<u> </u>				Years of			
Violation No.						Percent Interest	Depreciation			
						5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item Description										
rtem bescription										
Delayed Costs										
Equipment		1		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)	\$30	13-Apr-2023	22-Sep-2025	2.45	\$4	n/a	\$4			
Notes for DELAYED costs	container).	The Date Require	d is the initial inv	estigat complia	ion date and the F ance.	hazards of the cont inal Date is the esti	mated date of			
Avoided Costs	ANNU	ALIZE avoided of	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			
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) Notes for AVOIDED costs				0.00	\$0	\$0	\$0			
Approx. Cost of Compliance		\$30			TOTAL		\$4			

	Date 11-Dec-2			et No. 2023-1729-IHW-E	PC	:W
Respo	ndent COLUMB	COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P. Policy Revision 5 (January 2				
	D No. 65106					
Reg. Ent. Reference	ce No. RN10245					
		Industrial and Hazardous Waste				
		Stephanie McCurley				
Violation N		6				
Rule	Cite(s)	30 Tex. Admin. Co	de § 335.10(a)(1) and 40 CFR § 262.20(a)(1)		
	Fai	ed to include a TWC	for each hazardo	ous waste itemized on a mani	est.	
Violation Desc	rintion		•	ed for review that indicated the		
Violation Bess	itemized	hazardous wastes of		corresponding TWC for each h	azardous	
			waste on each i	manifest.		
				Base	Penalty \$2	25,000
F						
>> Environmental,	Property and	Human Health Harm	watrix			
R	Release Majo		Minor			
OR	Actual					
P	otential			Percent 0.0%		
D						
>>Programmatic M	atrix ïcation Majo	or Moderate	Minor			
Taisii	X X	Woderate	WILLION	Percent 20.0%		
Matrix Notes		100% of the ru	le requirement wa	as not met.		
Notes						
				A dissature a mat	¢20,000	
				Adjustment	\$20,000	
						\$5,000
Violation Events						
Nun	nber of Violation E	vents 1		20 Number of violation of	lays	
			· ·			
	dail	·				
	weel	· ·				
	mont			Walatian Dana	Danatha	¢E 000
quarterly Violation Base Penalty semiannual				Penaity	\$5,000	
	annu					
	single e					
	• •					
		One single	event is recomm	ended.		
Good Faith Efforts to	o Comply	0.0%		F	Reduction	\$0
		Before NOE/NOV	NOE/NOV to EDPRP	/Settlement Offer		
	Extraor	dinary				
	Or	dinary				
		N/A x				
		The Respond	lent does not me	et the good faith criteria for		
		Notes	this viol	ation.		
				Violation	Subtotal	\$5,000
Economic Benefit (E	B) for this vi	olation		Statutory Limit	Test	
				·		
E	Estimated EB An	nount	\$73	Violation Final Pena	Ity Total S	\$4,500
		This vio	lation Final Ass	essed Penalty (adjusted fo	or limits)	\$4,500
					/	

	E	conomic	Benefit	Wor	ksheet		
Respondent	Respondent COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P.						
Case ID No.	Case ID No. 65106						
Reg. Ent. Reference No.	RN102450277	1					
	Industrial and	Hazardous Waste				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		·					
11 111 111							
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	\$100	13-Apr-2023	22-Sep-2025	2.45	\$12	n/a	\$12
Training/Sampling	\$500	13-Apr-2023	22-Sep-2025	2.45	\$61	n/a	\$61
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	Estimated cost to list the correct TWC for each hazardous waste listed per manifest (\$100) and develop and implement procedures to ensure that TWCs will be included on all manifests in the future (\$500). The Dates Required are the initial investigation date and the Final Dates are the estimated date of compliance.						
Avoided Costs	ANNU	ALIZE avoided o	osts before en	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		\$600			TOTAL		\$73

Screening Date 11-Dec-2023 Docket No. 2023-1729-IHW-E **PCW** Respondent COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P. Policy Revision 5 (January 28, 2021) Case ID No. 65106 PCW Revision February 11, 2021 Reg. Ent. Reference No. RN102450277 Media Industrial and Hazardous Waste Enf. Coordinator Stephanie McCurley **Violation Number** Rule Cite(s) 30 Tex. Admin. Code § 335.56 and 40 CFR § 262.42(a)(2) Failed to submit an exception report for not receiving a copy of a manifest with the handwritten signature of the owner or operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter. Specifically, the Facility did not have copies of the hazardous waste manifests from designated facilities and had not submitted exception reports for Manifest Nos. 014006599FLE, 014006498FLE, 014006409FLE, 015108033FLE, 015108087FLE, 014962376FLE, 014962026FLE, 015947271FLE, 015947273FLE, 015947123FLE, 015947081FLE, 015946891FLE, and 014006662FLE in 2021; and for Manifest Nos. 014963029FLE, Violation Description 014963142FLE, 014963067FLE, 015944758FLE, 015623261FLE, 015623207FLE, 015623144FLE, 015623080FLE, 015622975FLE, 015622297FLE, 01562237FLE, 015622179FLE, 015622147FLE, 015622078FLE, 017506087FLE, 017506037FLE, 017505851FLE, 017505801FLE, 017511609FLE, 015621396FLE, 015621277FLE, 015621211FLE, 015621129FLE, 015621079FLE, 015621036FLE, 015620973FLE, 015620913FLE, 015623359FLE, 015623312FLE, 015944758FLE, 015944667FLE, 015944579FLE, 017505755FLE, 017505630FLE, 015621958FLE, 014963459FLE, and 014963233FLE in 2022. \$25,000 Base Penalty >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor OR Actual Potential Percent 0.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 20.0% Matrix 100% of the rule requirement was not met. Notes Adjustment \$20,000 \$5,000 Violation Events 20 Number of violation days Number of Violation Events daily weekly monthly quarterly **Violation Base Penalty** \$5,000 semiannual annual single event One single event is recommended. **Good Faith Efforts to Comply** \$0 0.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A The Respondent does not meet the good faith criteria for Notes this violation. \$5,000 **Violation Subtotal** Economic Benefit (EB) for this violation **Statutory Limit Test Estimated EB Amount Violation Final Penalty Total** \$612 \$4,500 \$4,500 This violation Final Assessed Penalty (adjusted for limits)

	E	conomic	Benefit	Wor	ksheet		
Respondent	Respondent COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P.						
Case ID No.	65106						
Rea. Ent. Reference No.	RN102450277						
		Hazardous Waste	9				Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
. to 2 dod. p.i.d							
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)	\$5,000	13-Apr-2023	22-Sep-2025	2.45	\$612	n/a	\$612
Notes for DELAYED costs Estimated delayed cost to submit 50 signed manifest copies not received (\$100 per report). The Date Required is the initial investigation date and the Final Date is the estimated date of compliance.							
Avoided Costs	ANNU	ALIZE avoided of	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
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		\$5,000			TOTAL		\$612

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



Compliance History Report

Compliance History Report for CN603966631, RN102450277, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Classification: HIGH

Classification: HIGH

Rating: 0.00

Rating: 0.00

Customer, Respondent, CN603966631, COLUMBIA MEDICAL

CENTER OF PLANO SUBSIDIARY, L.P.

Regulated Entity: RN102450277, Medical Center of

Plano

Complexity Points: 6 Repeat Violator: NO

CH Group: 14 - Other

Location: 3901 West 15th Street in Plano, Collin County, Texas

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

or Owner/Operator:

PETROLEUM STORAGE TANK REGISTRATION INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE

REGISTRATION 13007 REGISTRATION # (SWR) 90728

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

Date Compliance History Report Prepared: June 16, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: June 16, 2020 to June 16, 2025

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

Name: Stephanie McCurley Phone: (512) 239-2607

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? YES

3) Who is the current owner/operator? COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P. OWNER OPERATOR since

10/4/2011

HCA HEALTHCARE INC OWNER OPERATOR since 2/1/2021

4) Who was/were the prior owner(s)/operator(s)? HCA Holdings, Inc., OWNER OPERATOR, 3/22/2012 to 1/31/2021

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 August 20, 2021 (1755660)

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

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

N/A

	N/A
G.	Type of environmental management systems (EMSs): N/A
Н.	Voluntary on-site compliance assessment dates: N/A
I.	Participation in a voluntary pollution reduction program: $\ensuremath{N/A}$
J.	Early compliance: N/A
	es Outside of Texas: N/A

F. Environmental audits:

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
COLUMBIA MEDICAL CENTER OF	§	TEAA3 COMMISSION ON
PLANO SUBSIDIARY, L.P.	§	
RN102450277	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2023-1729-IHW-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 COLUI	MBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P. (the "Respondent")
under the authority of	TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE ch. 7. The
Executive Director of th	e TCEQ, through the Enforcement Division, and the Respondent
together stipulate that:	

- 1. The Respondent owns and operates a hospital located at 3901 West 15th Street in Plano, Collin County, Texas (the "Facility"). The Facility involves or involved the management of industrial and hazardous waste ("IHW") as defined in Tex. Health & Safety Code ch. 361.
- 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. Health & Safety Code ch. 361 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$37,575 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$30,060 of the penalty and \$7,515 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 Tex. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or

required in this action, are waived in the interest of a more timely resolution of the matter.

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

II. ALLEGATIONS

During a record review for the Facility conducted on November 21, 2023, an investigator documented that the Respondent:

- 1. Failed to update the Notice of Registration ("NOR"), in violation of 30 Tex. Admin. Code § 335.6(b). Specifically, the Facility's NOR was not updated to include a new waste stream for lead aprons, and the Environmental Protection Agency ("EPA") waste codes D010, D011, D022, P075, U002, U059, U129, and U150 for Texas Waste Code ("TWC") 0001004H.
- 2. Failed to submit to the Executive Director a complete and correct Annual Waste Summary ("AWS") detailing the management of each hazardous and Class I waste generated on-site during the reporting calendar year, in violation of 30 Tex. ADMIN. CODE § 335.9(a)(2). Specifically, the Respondent did not submit the AWS for the years 2021 and 2022. Also, the AWS for the year 2020 listed incorrect quantities of hazardous wastes generated, incorrect waste management codes, and incorrect TWCs.
- 3. Failed to prepare a five-year pollution prevention plan and maintain it on-site and make it available to Commission personnel for inspection, in violation of 30 Tex. ADMIN. CODE § 335.474(1).
- 4. Failed to maintain hazardous waste containers closed in a satellite accumulation area ("SAA") except when adding, removing, or consolidating waste, in violation of 30 Tex. ADMIN. CODE § 335.53(d) and 40 CODE OF FEDERAL REGULATIONS ("CFR") § 262.15(a)(4)(i). Specifically, two SAA containers were observed to have been left open when not in use by Facility staff.
- 5. Failed to mark or label containers with an indication of the hazards of the contents, in violation of 30 Tex. Admin. Code § 335.53(d) and 40 CFR § 262.15(a)(5)(ii). Specifically, three SAA containers were missing labels that indicated the hazards of the containers.
- 6. Failed to include a TWC for each hazardous waste itemized on a manifest, in violation of 30 Tex. Admin. Code § 335.10(a)(1) and 40 CFR § 262.20(a)(1). Specifically, multiple manifests were provided for review that indicated that the itemized hazardous wastes did not include a corresponding TWC for each hazardous waste on each manifest.

7. Failed to submit an exception report for not receiving a copy of a manifest with the handwritten signature of the owner or operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter, in violation of 30 Tex. ADMIN. CODE § 335.56 and 40 CFR § 262.42(a)(2). Specifically, the Facility did not have copies of the hazardous waste manifests from designated facilities and had not submitted exception reports for Manifest Nos. 014006599FLE, 014006498FLE, 014006409FLE, 015108033FLE, 015108087FLE, 014962376FLE, 014962026FLE, 015947271FLE, 015947273FLE, 015947123FLE, 015947081FLE, 015946891FLE, and 014006662FLE in 2021; and for Manifest Nos. 014963029FLE, 014963142FLE, 014963067FLE, 015944758FLE, 015623261FLE, 015623207FLE, 015623144FLE, 015623080FLE, 015622975FLE, 015622297FLE, 015622237FLE, 015622179FLE, 015622147FLE, 015622078FLE, 017506087FLE, 017506037FLE, 017505851FLE, 017505801FLE, 017511609FLE, 015621396FLE, 015621277FLE, 015621211FLE, 015621129FLE, 015621079FLE, 015621036FLE, 015620973FLE, 015620913FLE, 015623359FLE. 015623312FLE. 015944758FLE. 015944667FLE. 015944579FLE. 017505755FLE, 017505630FLE, 015621958FLE, 014963459FLE, and 014963233FLE in 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: COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P., Docket No. 2023-1729-IHW-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 undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Update the Facility's NOR to include the new lead apron waste stream and missing EPA waste codes, in accordance with 30 Tex. ADMIN. CODE § 335.6;
 - ii. Develop and implement procedures to ensure that the AWS is submitted timely, in accordance with 30 Tex. ADMIN. CODE § 335.9;

- iii. Complete and submit the AWS for the 2021 and 2022 calendar years and submit a corrected 2020 AWS, in accordance with 30 Tex. ADMIN. CODE § 335.9;
- iv. Prepare a five-year Pollution Prevention Plan and maintain it on-site and make it available to Commission personnel for inspection, in accordance with 30 Tex. ADMIN. CODE § 335.474;
- v. Securely close the two SAA containers containing hazardous waste, in accordance with 30 Tex. Admin. Code § 335.53 and 40 CFR § 262.15;
- vi. Label the three SAA containers indicating the hazards of the contents, in accordance with 30 Tex. Admin. Code § 335.53 and 40 CFR § 262.15; and
- vii. Develop and implement procedures to ensure that TWCs will be included on all manifests in the future, in accordance with 30 Tex. ADMIN. CODE § 335.10 and 40 CFR § 262.20.
- b. Within 60 days after the effective date of this Order:
 - i. List the correct TWC for each hazardous waste listed per manifest, in accordance with 30 Tex. Admin. Code § 335.10 and 40 CFR § 262.20; and
 - ii. Submit 50 signed manifest copies not received, in accordance with 30 Tex. ADMIN. CODE § 335.56 and 40 CFR § 262.42.
- c. Within 75 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos.
 2.a and 2.b. 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:

Waste Section Manager Dallas/Fort Worth Regional Office Texas Commission on Environmental Quality 2309 Gravel Drive Fort Worth, Texas 76118-6951

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 5. 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.

COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P. DOCKET NO. 2023-1729-IHW-E Page 6

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date	
Kripte Mello-Jurach	10/03/2025	
For the Executive Director	Date	

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- · Automatic referral to the OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature

Signature

Signature

Signature

Signature

Date

Coo

Name (Printed or typed)
Authorized Representative of

COLUMBIA MEDICAL CENTER OF PLANO SUBSIDIARY, L.P.

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