

Executive Summary – Enforcement Matter – Case No. 65795
Louis Vuitton U.S. Manufacturing, Inc.
RN110000056
Docket No. 2024-0581-MWD-E

Order Type:

Findings Agreed Order

Findings Order Justification:

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

Media:

MWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Louis Vuitton Rancho 54, 5520 County Road 316, Alvarado, Johnson County

Type of Operation:

Wastewater treatment facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: July 5, 2024

Comments Received: No

Penalty Information

Total Penalty Assessed: \$78,625

Total Paid to General Revenue: \$78,625

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: January 22, 2024

Date(s) of NOE(s): March 25, 2024

Executive Summary – Enforcement Matter – Case No. 65795
Louis Vuitton U.S. Manufacturing, Inc.
RN110000056
Docket No. 2024-0581-MWD-E

Violation Information

Failed to comply with permitted effluent limitations for dissolved oxygen, total suspended solids, *Escherichia coli*, ammonia nitrogen, and carbonaceous biochemical oxygen demand (5-day) [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0015622001, Effluent Limitations and Monitoring Requirements Nos. 1 and 6].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to, within 130 days, submit written certification of compliance with the effluent limitations of TPDES Permit No. WQ0015622001, including specific corrective actions that were implemented at the Facility 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: Taylor Williamson, Enforcement Division, Enforcement Team 1, MC R-12, (512) 239-2097; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Ludovic Pauchard, President, Louis Vuitton U.S. Manufacturing, Inc., 321 West Covinca Boulevard, San Dimas, California 91773

Jorge Saez Hidalgo, General Manager, Louis Vuitton U.S. Manufacturing, Inc., 321 West Covinca Boulevard, San Dimas, California 91773

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	1-Apr-2024	Screening	2-Apr-2024	EPA Due	
	PCW	26-Apr-2024				

RESPONDENT/FACILITY INFORMATION	
Respondent	Louis Vuitton U.S. Manufacturing, Inc.
Reg. Ent. Ref. No.	RN110000056
Facility/Site Region	4-Dallas/Fort Worth
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	65795	No. of Violations	3
Docket No.	2024-0581-MWD-E	Order Type	Findings
Media Program(s)	Water Quality	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Taylor Williamson
		EC's Team	Enforcement Team 1
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$46,250
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	70.0%	Adjustment	Subtotals 2, 3, & 7	\$32,375
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Notes: Enhancement for nine months of self-reported effluent violations and one agreed order without a denial of liability.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$2,518
Estimated Cost of Compliance: \$20,000
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$78,625
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$78,625
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$78,625
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$78,625
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Screening Date	2-Apr-2024	Docket No.	2024-0581-MWD-E	PCW
Respondent	Louis Vuitton U.S. Manufacturing, Inc.			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	65795			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN110000056			
Media	Water Quality			
Enf. Coordinator	Taylor Williamson			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	9	45%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 70%

>> Repeat Violator (Subtotal 3)

No	Adjustment Percentage (Subtotal 3)	0%
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>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer	Adjustment Percentage (Subtotal 7)	0%
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>> Compliance History Summary

Compliance History Notes	Enhancement for nine months of self-reported effluent violations and one agreed order without a denial of liability.
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Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 70%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 70%

Screening Date	2-Apr-2024	Docket No.	2024-0581-MWD-E	PCW	
Respondent	Louis Vuitton U.S. Manufacturing, Inc.	Policy Revision 5 (January 28, 2021)			
Case ID No.	65795	PCW Revision February 11, 2021			
Reg. Ent. Reference No.	RN110000056				
Media	Water Quality				
Enf. Coordinator	Taylor Williamson				
Violation Number	1				
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0015622001, Effluent Limitations and Monitoring Requirements No. 1				
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation tables.				
			Base Penalty	\$25,000	
>> Environmental, Property and Human Health Matrix					
OR	Release	Harm			
		Major	Moderate	Minor	
	Actual	x			Percent 50.0%
Potential					
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	A simplified model was used to evaluate ammonia nitrogen and carbonaceous biochemical oxygen demand (5-day) to determine whether the discharged amounts of pollutants exceeded protective levels. Total suspended solids was also considered. Human health or the environment has been exposed to pollutants that exceed levels that are protective of human health or environmental receptors as a result of the violation.				
			Adjustment	\$12,500	
				\$12,500	
Violation Events					
Number of Violation Events		2	62	Number of violation days	
	daily			Violation Base Penalty \$25,000	
	weekly				
	monthly	x			
	quarterly				
	semiannual				
	annual				
	single event				
Two monthly events are recommended for the months of December 2022 and March 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	\$25,000	
Economic Benefit (EB) for this violation Statutory Limit Test					
Estimated EB Amount		\$2,518	Violation Final Penalty Total	\$42,500	
This violation Final Assessed Penalty (adjusted for limits)				\$42,500	

Economic Benefit Worksheet

Respondent Louis Vuitton U.S. Manufacturing, Inc.
Case ID No. 65795
Reg. Ent. Reference No. RN110000056
Media Water Quality
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$20,000	30-Nov-2022	6-Jun-2025	2.52	\$2,518	n/a	\$2,518
Notes for DELAYED costs	Estimated cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations. The Date Required is the first date of noncompliance, and the Final Date is the estimated date of compliance.						

Avoided Costs

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

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

Approx. Cost of Compliance

\$20,000

TOTAL

\$2,518

Screening Date 2-Apr-2024 Respondent Louis Vuitton U.S. Manufacturing, Inc. Case ID No. 65795 Reg. Ent. Reference No. RN110000056 Media Water Quality Enf. Coordinator Taylor Williamson	Docket No. 2024-0581-MWD-E	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	2	
Rule Cite(s)		30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0015622001, Effluent Limitations and Monitoring Requirements Nos. 1 and 6
Violation Description		Failed to comply with permitted effluent limitations, as shown in the attached effluent violation tables.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual		x		Percent 25.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
					Percent 0.0%

Matrix Notes	A simplified model was used to evaluate ammonia nitrogen and carbonaceous biochemical oxygen demand (5-day) to determine whether the discharged amounts of pollutants exceeded protective levels. Dissolved oxygen, total suspended solids, and <i>Escherichia coli</i> were also considered. Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.
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Adjustment \$18,750
\$6,250

Violation Events

Number of Violation Events 1	31	Number of violation days
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daily		Violation Base Penalty \$6,250
weekly		
monthly	x	
quarterly		
semiannual		
annual		
single event		

One monthly event is recommended for the month of August 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 \$6,250

Economic Benefit (EB) for this violation

Estimated EB Amount \$0	Statutory Limit Test
	Violation Final Penalty Total \$10,625
This violation Final Assessed Penalty (adjusted for limits) \$10,625	

Economic Benefit Worksheet

Respondent Louis Vuitton U.S. Manufacturing, Inc.
Case ID No. 65795
Reg. Ent. Reference No. RN110000056
Media Water Quality
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See Economic Benefit Worksheet for Violation No. 1.						

Avoided Costs

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

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

Approx. Cost of Compliance

TOTAL

Screening Date 2-Apr-2024 Respondent Louis Vuitton U.S. Manufacturing, Inc. Case ID No. 65795 Reg. Ent. Reference No. RN110000056 Media Water Quality Enf. Coordinator Taylor Williamson	Docket No. 2024-0581-MWD-E	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	3		
Rule Cite(s)		30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0015622001, Effluent Limitations and Monitoring Requirements Nos. 1 and 6	
Violation Description		Failed to comply with permitted effluent limitations, as shown in the attached effluent violation tables.	

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

Matrix Notes		Falsification	Major	Moderate	Minor	
						Percent 0.0%

A simplified model was used to evaluate ammonia nitrogen and carbonaceous biochemical oxygen demand (5-day) to determine whether the discharged amounts of pollutants exceeded protective levels. Dissolved oxygen, total suspended solids, and Escherichia coli were also considered. Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 4		Number of violation days 272
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daily		
weekly		
monthly		
quarterly	x	
semiannual		
annual		
single event		

Violation Base Penalty \$15,000

Four quarterly events are recommended for the quarters containing the months of November 2022, and January, February, April, May, June, July, September, and October 2023.

Good Faith Efforts to Comply

	0.0%	
	<small>Before NOE/NOV</small>	<small>NOE/NOV to EDPRP/Settlement Offer</small>
Extraordinary		
Ordinary		
N/A	x	

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

Violation Subtotal \$15,000

Economic Benefit (EB) for this violation

Estimated EB Amount \$0	Statutory Limit Test
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Violation Final Penalty Total \$25,500	
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This violation Final Assessed Penalty (adjusted for limits) \$25,500

Economic Benefit Worksheet

Respondent Louis Vuitton U.S. Manufacturing, Inc.
Case ID No. 65795
Reg. Ent. Reference No. RN110000056
Media Water Quality
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See Economic Benefit Worksheet for Violation No. 1.						

Avoided Costs

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

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

Approx. Cost of Compliance

TOTAL

Louis Vuitton Rancho 54 TPDES Permit No. WQ0015622001 Case No. 65795 Docket No. 2024-0581-MWD-E					
Effluent Violation Tables					
	DO Min. Conc.	TSS Single Grab Conc.	TSS Daily Avg. Load.	<i>E. coli</i> Daily Avg. Conc.	<i>E. coli</i> Single Grab Conc.
Monitoring Period	Limit = 4.0 mg/L	Limit = 30 mg/L	Limit = 0.5 lbs/day	Limit = 126 CFU/100 mL	Limit = 399 CFU/100 mL
December 2022	c	c	1.6711	c	c
April 2023	3.1	c	c	c	c
May 2023	c	c	c	770	770
June 2023	c	37	1.0023	c	c
July 2023	2.8	c	c	c	c
August 2023	2.8	c	c	514	2,420
September 2023	3	32	c	c	c

	CBOD (5-day) Daily Avg. Conc.	Ammonia Nitrogen Daily Avg. Conc.	TSS Daily Avg. Conc.
Monitoring Period	Limit = 5 mg/L	Limit = 2 mg/L	Limit = 5 mg/L
November 2022	6	c	6
December 2022	c	19.55	12
January 2023	7	3.82	6
February 2023	6	4	6
March 2023	10	21.3	8
April 2023	6	2.5	7
June 2023	10	6.2	24
August 2023	7	2.9	c
September 2023	6	4.8	9
October 2023	6	c	c

	CBOD (5 day) Daily Avg. Load.	Ammonia Nitrogen Single Grab Conc.	Ammonia Nitrogen Daily Avg. Load.
Monitoring Period	Limit = 0.5 lbs/day	Limit = 15 mg/L	Limit = 0.2 lbs/day
December 2022	1.6774	45.9	2.8377
March 2023	c	38.6	0.9076
June 2023	c	c	0.3299

CBOD = carbonaceous biochemical oxygen demand
DO = dissolved oxygen TSS = total suspended solids
E. coli = *Escherichia coli* Min. = minimum
Conc. = concentration Avg. = average
Load. = loading

mg/L = milligrams per liter
lbs/day = pounds per day
CFU/100 mL = colony forming units per 100
milliliters
c = compliant



Compliance History Report

Compliance History Report for CN605428853, RN110000056, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner/Operator: CN605428853, Louis Vuitton U.S. Manufacturing, Inc. **Classification:** SATISFACTORY **Rating:** 22.00

Regulated Entity: RN110000056, LOUIS VUITTON RANCHO 54 **Classification:** SATISFACTORY **Rating:** 22.00

Complexity Points: 4 **Repeat Violator:** NO

CH Group: 09 - Construction

Location: 5520 COUNTY ROAD 316, ALVARADO, JOHNSON COUNTY, TEXAS

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

WASTEWATER EPA ID TX0138061

WASTEWATER PERMIT WQ0015622001

Compliance History Period: September 01, 2018 to August 31, 2023 **Rating Year:** 2023 **Rating Date:** 09/01/2023

Date Compliance History Report Prepared: April 02, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: April 02, 2019 to April 02, 2024

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

Name: Taylor Williamson

Phone: (512) 239-2097

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five-year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1 Effective Date: 11/08/2022 ADMINORDER 2021-0814-MWD-E (Findings Order-Agreed Order Without Denial)
- Classification: Moderate
- Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
- Rqmt Prov: Effluent Limits PERMIT
- Description: Failure to comply with permit effluent limits as documented by a TCEQ record review of self-reported data.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	June 17, 2020	(1669047)	Item 5	January 19, 2021	(1719683)
Item 2	July 17, 2020	(1676005)	Item 6	September 22, 2022	(1858664)
Item 3	September 18, 2020	(1689329)	Item 7	October 24, 2022	(1864996)
Item 4	October 20, 2020	(1695690)	Item 8	November 28, 2022	(1871886)

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: 04/30/2023 (1914894)
- 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: 05/31/2023 (1921524)		
	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		
3	Date: 06/30/2023 (1928502)		
	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		
4	Date: 07/31/2023 (1935421)		
	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		
5	Date: 08/31/2023 (1941666)		
	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		
6	Date: 09/30/2023 (1948423)		
	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		
7	Date: 10/31/2023 (1954094)		
	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		
8	Date: 11/30/2023 (1963900)		
	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		
9	Date: 12/31/2023 (1970464)		
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)		
	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A

All NOV's Issued During Component Period 4/2/2019 and 4/2/2024

1	Date: 12/31/2019 (1636464) 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: 01/31/2020 (1643075) 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
3	Date: 02/29/2020 (1649581) 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
4	Date: 03/31/2020 (1655960) 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
5	Date: 04/30/2020 (1662490) 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
6	Date: 07/31/2020 (1682798) 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
7	Date: 10/31/2020 (1719681) 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
8	Date: 11/30/2020 (1719682) 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	
9	Date:	01/31/2021 (1732764)	
	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	
10	Date:	02/28/2021 (1732765)	
	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	
11	Date:	03/31/2021 (1732766)	
	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	
12	Date:	04/30/2021 (1743680)	
	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	
13	Date:	05/31/2021 (1748823)	
	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	
14	Date:	06/30/2021 (1754110)	
	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	
15	Date:	07/31/2021 (1759448)	
	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	
16	Date:	08/31/2021 (1768876)	
	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	

17	Date: 09/30/2021 (1780048)		
	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		
18	Date: 10/31/2021 (1786103)		
	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		
19	Date: 11/30/2021 (1793094)		
	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		
20	Date: 12/31/2021 (1800913)		
	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		
21	Date: 01/31/2022 (1808738)		
	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		
22	Date: 02/28/2022 (1815844)		
	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		
23	Date: 03/31/2022 (1822417)		
	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		
24	Date: 04/30/2022 (1831272)		
	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		
25	Date: 05/31/2022 (1837552)		
	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		
26	Date: 06/30/2022 (1844717)		
	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		
27	Date: 07/31/2022 (1851232)		
	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		
28*	Date: 11/30/2022 (1877768)		
	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		
29*	Date: 12/31/2022 (1884574)		
	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		
30*	Date: 01/31/2023 (1892370)		
	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		
31*	Date: 02/02/2023 (1872868)		
	Self Report? NO	Classification: Moderate	
	Citation: 30 TAC Chapter 217, SubChapter M 217.330(b) TX0138061 PERMIT WQ0015622001 PERMIT		
	Description: Failed to test the reduced-pressure backflow assembly (RPBA) annually.		
	Self Report? NO	Classification: Moderate	
	Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)		
	TX0138061 PERMIT WQ0015622001 PERMIT		
	Description: Failed to submit the annual sludge report.		
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 217, SubChapter B 217.33(a) 30 TAC Chapter 305, SubChapter F 305.125(1) TX0138061 PERMIT WQ0015622001 PERMIT		
	Description: Failed to calibrate the flow measurement device at least annually to ensure accuracy.		
	Self Report? NO	Classification: Moderate	

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TX0138061 PERMIT
WQ0015622001 PERMIT

Description: Failed to maintain compliance with the permitted effluent limits.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TX0138061 PERMIT
WQ0015622001 PERMIT

Description: Failed to provide notification of any effluent violation which deviates from the permitted effluent limitation by more than 40%.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 217, SubChapter C 217.63(c)
TX0138061 PERMIT
WQ0015622001 PERMIT

Description: Failed to provide an audio alarm system at the onsite lift station.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 217, SubChapter C 217.60(d)
TX0138061 PERMIT
WQ0015622001 PERMIT

Description: Failed to provide a ventilation system at the onsite lift station.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 319, SubChapter A 319.1
TX0138061 PERMIT
WQ0015622001 PERMIT

Description: Failed to accurately report effluent data.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TX0138061 PERMIT
WQ0015622001 PERMIT

Description: Failed to utilize an approved disinfection system.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(5)
TX0138061 PERMIT
WQ0015622001 PERMIT

Description: Failed to properly operate and maintain the facility.

32* Date: 02/28/2023 (1900964)

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

33* Date: 03/31/2023 (1907758)

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

34* Date: 04/30/2023 (1914894)

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

35*	Date: 05/31/2023 (1921524)		
	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		
36*	Date: 06/30/2023 (1928502)		
	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		
37*	Date: 07/31/2023 (1935421)		
	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		
38*	Date: 08/31/2023 (1941666)		
	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		
39	Date: 09/30/2023 (1948423)		
	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		
40	Date: 10/31/2023 (1954094)		
	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		
41	Date: 11/30/2023 (1963900)		
	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		
42	Date: 12/31/2023 (1970464)		
	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		

* NOV's applicable for the Compliance History rating period 9/1/2018 to 8/31/2023

All Investigations Conducted During Component Period April 02, 2019 and April 02, 2024

Item 1	January 20, 2020**	(1636464)	Item 27	February 10, 2022**	(1808738)
Item 2	February 13, 2020**	(1643075)	Item 28	March 15, 2022**	(1815844)
Item 3	March 23, 2020**	(1649581)	Item 29	April 15, 2022**	(1822417)
Item 4	April 17, 2020**	(1655960)	Item 30	May 18, 2022**	(1831272)
Item 5	May 13, 2020**	(1662490)	Item 31	June 20, 2022**	(1837552)
Item 6*	June 17, 2020**	(1669047)	Item 32	July 20, 2022**	(1844717)
Item 7*	July 17, 2020**	(1676005)	Item 33	August 18, 2022**	(1851232)
Item 8	August 14, 2020**	(1682798)	Item 34*	September 22, 2022**	(1858664)
Item 9*	September 18, 2020**	(1689329)	Item 35*	October 24, 2022**	(1864996)
Item 10*	October 20, 2020**	(1695690)	Item 36*	November 28, 2022**	(1871886)
Item 11	November 17, 2020**	(1719681)	Item 37	December 28, 2022**	(1877768)
Item 12	December 15, 2020**	(1719682)	Item 38	January 23, 2023**	(1884574)
Item 13*	January 19, 2021**	(1719683)	Item 39	January 25, 2023**	(1872868)
Item 14	February 12, 2021**	(1732764)	Item 40	February 15, 2023**	(1892370)
Item 15	March 19, 2021**	(1732765)	Item 41	March 07, 2023**	(1900964)
Item 16	April 13, 2021**	(1732766)	Item 42	April 20, 2023**	(1907758)
Item 17	May 18, 2021**	(1743680)	Item 43	May 10, 2023**	(1898048)
Item 18	June 16, 2021**	(1710642)	Item 44	June 19, 2023**	(1921524)
Item 19	June 18, 2021**	(1748823)	Item 45	July 20, 2023**	(1928502)
Item 20	July 16, 2021**	(1754110)	Item 46	August 14, 2023**	(1935421)
Item 21	August 19, 2021**	(1759448)	Item 47	September 13, 2023	(1941666)
Item 22	September 10, 2021**	(1768876)	Item 48	October 09, 2023	(1948423)
Item 23	October 12, 2021**	(1780048)	Item 49	November 16, 2023	(1954094)
Item 24	November 18, 2021**	(1786103)	Item 50	December 18, 2023	(1963900)
Item 25	December 16, 2021**	(1793094)	Item 51	January 16, 2024	(1970464)
Item 26	January 18, 2022**	(1800913)	Item 52	March 27, 2024	(1955730)

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2018 and 08/31/2023.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
LOUIS VUITTON U.S.
MANUFACTURING, INC.
RN110000056

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

AGREED ORDER DOCKET NO. 2024-0581-MWD-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Louis Vuitton U.S. Manufacturing, Inc. (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

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

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

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

I. FINDINGS OF FACT

1. The Respondent owns and operates a wastewater treatment facility located at 5520 County Road 316 in Alvarado, Johnson County, Texas (the "Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. During a record review for the Facility conducted on January 22, 2024, an investigator documented that the Respondent did not comply with permitted effluent limitations, as shown in the effluent violation tables below.

Effluent Violation Tables					
	DO Min. Conc.	TSS Single Grab Conc.	TSS Daily Avg. Load.	<i>E. coli</i> Daily Avg. Conc.	<i>E. coli</i> Single Grab Conc.
Monitoring Period	Limit = 4.0 mg/L	Limit = 30 mg/L	Limit = 0.5 lbs/day	Limit = 126 CFU/100 mL	Limit = 399 CFU/100 mL
December 2022	c	c	1.6711	c	c
April 2023	3.1	c	c	c	c
May 2023	c	c	c	770	770
June 2023	c	37	1.0023	c	c
July 2023	2.8	c	c	c	c
August 2023	2.8	c	c	514	2,420
September 2023	3	32	c	c	c

	CBOD (5-day) Daily Avg. Conc.	Ammonia Nitrogen Daily Avg. Conc.	TSS Daily Avg. Conc.
Monitoring Period	Limit = 5 mg/L	Limit = 2 mg/L	Limit = 5 mg/L
November 2022	6	c	6
December 2022	c	19.55	12
January 2023	7	3.82	6
February 2023	6	4	6
March 2023	10	21.3	8
April 2023	6	2.5	7
June 2023	10	6.2	24
August 2023	7	2.9	c
September 2023	6	4.8	9
October 2023	6	c	c

	CBOD (5 day) Daily Avg. Load.	Ammonia Nitrogen Single Grab Conc.	Ammonia Nitrogen Daily Avg. Load.
Monitoring Period	Limit = 0.5 lbs/day	Limit = 15 mg/L	Limit = 0.2 lbs/day
December 2022	1.6774	45.9	2.8377
March 2023	c	38.6	0.9076
June 2023	c	c	0.3299

CBOD = carbonaceous biochemical oxygen demand

DO = dissolved oxygen

TSS = total suspended solids

E. coli = *Escherichia coli*

Min. = minimum

Conc. = concentration

Avg. = average

Load. = loading

mg/L = milligrams per liter

lbs/day = pounds per day

CFU/100 mL = colony forming units per 100
milliliters

c = compliant

II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE ch. 26 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2, the Respondent 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. WQ0015622001, Effluent Limitations and Monitoring Requirements Nos. 1 and 6.
3. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
4. An administrative penalty in the amount of \$78,625 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$78,625 penalty.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 4 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Louis Vuitton U.S. Manufacturing, Inc., Docket No. 2024-0581-MWD-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 written certification of compliance with the effluent limitations of TPDES Permit No. WQ0015622001, including specific corrective actions that were implemented at the Facility 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 certifications shall include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with the permitted effluent limitations. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

Water Section Manager
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. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
7. 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.
8. 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.

9. 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.
10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

Date

6/28/2024

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

06/05/2024

Date

JORGE SAEZ HIDALGO

Name (Printed or typed)

Authorized Representative of

Louis Vuitton U.S. Manufacturing, Inc.

GENERAL MANAGER

Title

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

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.