Executive Summary – Enforcement Matter – Case No. 65877
Republic Plastics, Ltd.
RN100851211
Docket No. 2024-0689-AIR-E

Order Type:
1660 Agreed Order
Findings Order Justification:
N/A
Media:
AIR
Small Business:
Yes
Location(s) Where Violation(s) Occurred:
Republic Plastics Seguin Foam Plant, 355 Schumann Road, McQueeney, Guadalupe County
Type of Operation:
Chemical manufacturing plant
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: July 3, 2026
Comments Received: No

Penalty Information

Total Penalty Assessed: $41,100
Amount Deferred for Expedited Settlement: $8,220
Total Paid to General Revenue: $32,880
Total Due to General Revenue: $0
Payment Plan: N/A
Compliance History Classifications:
Person/CN - Satisfactory
Site/RN - Satisfactory
Major Source: Yes
Statutory Limit Adjustment: N/A
Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A
Complaint Information: N/A
Date(s) of Investigation: March 5, 2024
Date(s) of NOE(s): April 12, 2024

Executive Summary – Enforcement Matter – Case No. 65877
Republic Plastics, Ltd.
RN100851211
Docket No. 2024-0689-AIR-E

Violation Information

Failed to comply with the maximum allowable emissions rate ("MAER"). Specifically, the Respondent exceeded the volatile organic compounds ("VOC") MAER of 48.90 pounds per hour ("lbs/hr") by a range from 1.79 lbs/hr to 12.61 lbs/hr on nine days from January 26, 2023 to January 4, 2024 for the Building Fugitives ("BLDGFUG") from Lines 1 and 2, Emissions Point Number ("EPN"), BLDGFUG, resulting in 62.77 lbs of unauthorized VOC [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and (c), and 122.143(4), New Source Review Permit No. 40212 Special Conditions No. 8, Federal Operating Permit No. O2680, General Terms and Conditions and Special Terms and Conditions No. 4, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By February 14, 2024, the Respondent complied with the VOC maximum allowable MAER and implemented a daily review of the 5-day rolling average hourly VOC emissions to identify emissions trends that may be approaching the permitted emissions limits and make process and production adjustments to ensure compliance with the short-term emission rates.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Jennifer Graves, Enforcement Division, Enforcement Team 2, MC R-15, (956) 430-6023; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548
Respondent: Jose Colon, Vice President of Operations, Republic Plastics, Ltd., 355 Schumann Road, McQueeney, Texas 78123
Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021) — *PCW Revision February 11, 2021*

DATES						
	Assigned	25-Apr-2024				
	PCW	4-May-2026	**Screening**	25-Apr-2024	**EPA Due**	

RESPONDENT/FACILITY INFORMATION

Respondent	Republic Plastics, Ltd.		
Reg. Ent. Ref. No.	RN100851211		
Facility/Site Region	13-San Antonio	**Major/Minor Source**	Major

CASE INFORMATION

Enf./Case ID No.	65877	**No. of Violations**	1
Docket No.	2024-0689-AIR-E	**Order Type**	1660
Media Program(s)	Air	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	Jennifer Graves
		EC's Team	Enforcement Team 2

Admin. Penalty $ Limit Minimum $0 Maximum $25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) — ***Subtotal 1*** **$30,000**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History **62.0%** Adjustment — ***Subtotals 2, 3, & 7*** **$18,600**

Notes: Enhancement for one NOV with dissimilar violations and three agreed orders containing a denial of liability.

Culpability No **0.0%** Enhancement — ***Subtotal 4*** **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — ***Subtotal 5*** **-$7,500**

Economic Benefit **0.0%** Enhancement* — ***Subtotal 6*** **$0**

Total EB Amounts $526
Estimated Cost of Compliance $10,000

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — ***Final Subtotal*** **$41,100**

OTHER FACTORS AS JUSTICE MAY REQUIRE **0.0%** — ***Adjustment*** **$0**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount **$41,100**

STATUTORY LIMIT ADJUSTMENT — ***Final Assessed Penalty*** **$41,100**

DEFERRAL **20.0%** Reduction — ***Adjustment*** **-$8,220**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **$32,880**

Screening Date	25-Apr-2024	**Docket No.** 2024-0689-AIR-E	**PCW**
Respondent	Republic Plastics, Ltd.		*Policy Revision 5 (January 28, 2021)*
Case ID No.	65877		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN100851211		
Media	Air		
Enf. Coordinator	Jennifer Graves		

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 (*number of NOVs meeting criteria*)	0	0%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	3	60%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgments or consent decrees meeting criteria*)	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 (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	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 *(number of audits for which notices were submitted)*	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	0	0%

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) 62%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with dissimilar violations and three agreed orders containing a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 62%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** 62%

Screening Date	25-Apr-2024	**Docket No.** 2024-0689-AIR-E	**PCW**
Respondent	Republic Plastics, Ltd.		*Policy Revision 5 (January 28, 2021)*
Case ID No.	65877		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN100851211		
Media	Air		
Enf. Coordinator	Jennifer Graves		

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c), and 122.143(4), New Source Review Permit No. 40212, Special Conditions No. 8, Federal Operating Permit No. O2680, General Terms and Conditions and Special Terms and Conditions No. 4, and Tex. Health & Safety Code § 382.085(b)

Violation Description Failure to comply with the maximum allowable emissions rate ("MAER"). Specifically, the Respondent exceeded the volatile organic compounds ("VOC") MAER of 48.90 pounds per hour (lbs/hr") by a range from 1.79 lbs/hr to 12.61 lbs/hr on nine days from January 26, 2023 to January 4, 2024 for the Building Fugitives from Lines 1 and 2, Emissions Point Number ("EPN"), BLDGFUG, resulting in 62.77 lbs of unauthorized VOC.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual			x
Potential			

Percent 30.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: 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 this violation.

Adjustment $17,500

$7,500

Violation Events

Number of Violation Events: 4 — 9 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty $30,000

Four quarterly events are recommended for the period of non-compliance from January 26, 2023 to January 4, 2024.

Good Faith Efforts to Comply

25.0% Reduction $7,500

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

Notes: The Respondent completed the corrective measures by February 14, 2024, prior to the Notice of Enforcement dated April 12, 2024.

Violation Subtotal $22,500

Economic Benefit (EB) for this violation

Estimated EB Amount $526

Statutory Limit Test

Violation Final Penalty Total $41,100

This violation Final Assessed Penalty (adjusted for limits) $41,100

Economic Benefit Worksheet

Respondent Republic Plastics, Ltd.
Case ID No. 65877
Reg. Ent. Reference No. RN100851211
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$10,000	26-Jan-2023	14-Feb-2024	1.05	$526	n/a	$526
Notes for DELAYED costs	Estimated cost to submit written documentation to demonstrate actions that have been taken to comply with the VOC hourly MAER for the Building Fugitive Lines 1 and 2, EPN BLDGFUG. The Date Required is the first date of non-compliance and the Final Date is the date of compliance.						
Avoided Costs	**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	$10,000	TOTAL	$526

The TCEQ is committed to accessibility.
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 CN600528772, RN100851211, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator: CN600528772, Republic Plastics, Ltd. **Classification:** SATISFACTORY **Rating:** 14.42

Regulated Entity: RN100851211, REPUBLIC PLASTICS SEGUIN FOAM PLANT **Classification:** SATISFACTORY **Rating:** 14.42

Complexity Points: 8 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 355 SCHUMANN RD MC QUEENEY, TX 78123-3260, GUADALUPE COUNTY

TCEQ Region: REGION 13 - SAN ANTONIO

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER GL0145C
AIR OPERATING PERMITS PERMIT 2680
AIR NEW SOURCE PERMITS PERMIT 40212
AIR NEW SOURCE PERMITS ACCOUNT NUMBER GL0145C
AIR NEW SOURCE PERMITS AFS NUM 4818700017
AIR EMISSIONS INVENTORY ACCOUNT NUMBER GL0145C

Compliance History Period: September 01, 2020 to August 31, 2025 **Rating Year:** 2025 **Rating Date:** 09/01/2025

Date Compliance History Report Prepared: February 03, 2026

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 03, 2021 to February 03, 2026

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

Name: TCEQ Staff Member **Phone:** (512) 239-1000

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: 04/06/2021 ADMINORDER 2020-0861-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(B)
30 TAC Chapter 122, SubChapter B 122.145(2)(C)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition No. 1 PERMIT
Special Terms and Conditions No. 5 OP

Description: Failed to comply with the maximum allowable emission rate

2 Effective Date: 05/09/2023 ADMINORDER 2022-0733-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(C)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: 2680 OP
Description: Failure to submit a Title V Deviation Report no later than 30 days after the end of the reporting period. EIC A12(7), 602(d)(2)(B)

3 Effective Date: 08/20/2024 ADMINORDER 2023-1082-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Major
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Maximum Allowable Emission Rate Table PERMIT
Special Condition 4 OP
Description: Failure to comply with the maximum allowable emissions rate ("MAER"). Specifically, the Respondent exceeded the volatile organic compounds ("VOC") MAER of 48.90 pounds per hour ("lbs/hr") by a range from 0.31 lb/hr to 9.24 lbs/hr on 17 days from March 30, 2022 to December 23, 2022 for Building Fugitives from Lines 1 and 2, Emissions Point Number ("EPN") BLDGFUG, resulting in 1,154.16 pounds of unauthorized VOC emissions

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 22, 2021 (1722766)
Item 2 April 08, 2022 (1797163)

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: 06/20/2025 (2069356)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Description: Failure to submit deviations on the deviation report.

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

Compliance History Report for CN600528772, RN100851211, Rating Year 2025 which includes Compliance History (CH) components from February 03, 2021, through February 03, 2026.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING REPUBLIC PLASTICS, LTD. RN100851211	**§ § § § § §**	**BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2024-0689-AIR-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 Republic Plastics, Ltd. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE Ch. 382 and TEX. WATER CODE Ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a chemical manufacturing plant located at 355 Schumann Road in McQueeney, Guadalupe County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).

2. 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. 382 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 $41,100 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid $32,880 of the penalty and $8,220 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

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

7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.

8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

9. The Executive Director recognizes that, by February 14, 2024, the Respondent complied with the volatile organic compounds ("VOC") maximum allowable emissions rate ("MAER") and implemented a daily review of the 5-day rolling average hourly VOC emissions to identify emissions trends that may be approaching the permitted emissions limits and make process and production adjustments to ensure compliance with the short-term emission rates.

II. ALLEGATIONS

During a record review for the Plant conducted on March 5, 2024, an investigator documented that the Respondent failed to comply with the maximum allowable emissions rate ("MAER"). Specifically, the Respondent exceeded the volatile organic compounds ("VOC") MAER of 48.90 pounds per hour (lbs/hr") by a range from 1.79 lbs/hr to 12.61 lbs/hr on nine days from January 26, 2023 to January 4, 2024 for the Building Fugitives from Lines 1 and 2, Emissions Point Number ("EPN"), BLDGFUG, resulting in 62.77 lbs of unauthorized VOC, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and (c), and 122.143(4), New Source Review Permit No. 40212 Special Conditions No. 8, Federal Operating Permit No. O2680, General Terms and Conditions and Special Terms and Conditions No. 4, and TEX. HEALTH & SAFETY CODE § 382.085(b).

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: Republic Plastics, Ltd., Docket No. 2024-0689-AIR-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. All relief not expressly granted in this Order is denied.

3. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.

4. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.

5. 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.

6. 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.

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
Kristin Mello-Jurack	07/13/2026
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	5/14/26 Date
Jose Colon	VP of Operations TX
Name (Printed or typed) Authorized Representative of Republic Plastics, Ltd..	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.