

Executive Summary – Enforcement Matter – Case No. 63441

Isaias Sanchez

RN105722136

Docket No. 2024-0744-SLG-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

SLG

Small Business:

No

Location(s) Where Violation(s) Occurred:

Sanchez Septic Tank SVC, 312 East Rosedale Street, Tyler, Smith County

Type of Operation:

Sludge transporter business

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: The complainant has expressed an interest in this matter but does not wish to speak at Agenda.

Texas Register Publication Date: May 9, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$19,254

Total Paid to General Revenue: \$564

Total Due to General Revenue: \$18,690

Payment Plan: 35 payments of \$534 each

Compliance History Classifications:

Person/CN - Unclassified

Site/RN - Unclassified

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): October 17, 2022

Complaint Information: Alleged illegal disposal of sewage.

Date(s) of Investigation: October 20, 2022 through October 26, 2022

Date(s) of NOE(s): November 25, 2022

Executive Summary – Enforcement Matter – Case No. 63441

Isaias Sanchez

RN105722136

Docket No. 2024-0744-SLG-E

Violation Information

1. Failed to prominently mark vehicles used to collect and transport wastes. Specifically, the 2008 Ford with Texas license plate number PPJ-4070 did not display the TCEQ registration number on either side of the vehicle [30 TEX. ADMIN. CODE § 312.144(a)(4)].
2. Failed to deposit wastes at a facility designated by or acceptable to the generator where the owner or operator of the facility agrees to receive the wastes and the facility has written authorization by permit or registration issued by the executive director to receive wastes. Specifically, the Respondent admitted to disposing of sewage at 15241 County Road 1105 in Flint, Smith County, Texas ("Property") when the City of Tyler Wastewater Treatment Plant was unable to accept loads on the weekend or to avoid the wastewater treatment plant disposal fees. One of the Business's vehicles with Texas license plate number BWD-8370 was documented discharging domestic septage at the Property on October 20, 2022. The Property contained numerous areas saturated with domestic septage and sludge solids that indicated the sludge hauler had been continuously dumping at the Property. One of the discharges was observed flowing off the Property onto an adjacent property located south of the Property line [30 TEX. ADMIN. CODE § 312.143(a) and TEX. WATER CODE § 26.121(a)(1)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to:

- a. Immediately, cease the unauthorized disposal of sludge waste.
- b. Within 30 days:
 - i. Mark the TCEQ registration number on both sides of the unmarked sludge transportation vehicle (2008 Ford with Texas license plate number PPJ-4070);
 - ii. Cover the exposed domestic septage, and clean and disinfect the affected area at 15241 County Road 1105 in Flint, Smith County with soil; and
 - iii. Update the Business's operational procedures and conduct training to ensure that sludge is disposed of at a properly permitted or registered facility.
- c. Within 45 days, submit written certification to demonstrate compliance with a.

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Isaias Sanchez

RN105722136

Docket No. 2024-0744-SLG-E

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: Isaias Sanchez, Owner, 312 East Rosedale Street, Tyler, Texas 75702

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	5-Dec-2022	Screening	14-Dec-2022	EPA Due	
	PCW	1-Apr-2024				

RESPONDENT/FACILITY INFORMATION

Respondent	Isaias Sanchez				
Reg. Ent. Ref. No.	RN105722136				
Facility/Site Region	5-Tyler	Major/Minor Source	Minor		

CASE INFORMATION

Enf./Case ID No.	63441	No. of Violations	2
Docket No.	2024-0744-SLG-E	Order Type	1660
Media Program(s)	Municipal Solid Waste	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	\$15,000
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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	0.0%	Adjustment	Subtotals 2, 3, & 7	\$0
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Notes: No adjustments for Compliance History.

Culpability	Yes	25.0%	Enhancement	Subtotal 4	\$3,750
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Notes: The Respondent maintained a TCEQ registration as a Sludge Transporter. As such, the Respondent could have reasonably anticipated and avoided each alleged violation.

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: \$810
Estimated Cost of Compliance: \$3,100
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$18,750
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OTHER FACTORS AS JUSTICE MAY REQUIRE	2.7%	Adjustment	\$504
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: Recommended enhancement to capture the avoided cost of compliance associated with Violation No. 2.

Final Penalty Amount	\$19,254
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$19,254
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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 due to culpability.

PAYABLE PENALTY	\$19,254
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Screening Date	14-Dec-2022	Docket No.	2024-0744-SLG-E	PCW
Respondent	Isaias Sanchez			
Case ID No.	63441			
Reg. Ent. Reference No.	RN105722136			
Media	Municipal Solid Waste			
Enf. Coordinator	Taylor Williamson			

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

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

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Unclassified

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

No adjustments for Compliance History.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 0%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 0%

Screening Date 14-Dec-2022		Docket No. 2024-0744-SLG-E		PCW	
Respondent Isaias Sanchez		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 63441		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN105722136					
Media Municipal Solid Waste					
Enf. Coordinator Taylor Williamson					
Violation Number 1					
Rule Cite(s)		30 Tex. Admin. Code § 312.144(a)(4)			
Violation Description		Failed to prominently mark vehicles used to collect and transport wastes. Specifically, the 2008 Ford with Texas license plate number PPJ-4070 did not display the TCEQ registration number on either side of the vehicle.			
		Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix					
OR	Release		Harm		
		Major	Moderate	Minor	
	Actual				Percent 0.0%
	Potential				
>>Programmatic Matrix					
	Falsification		Moderate		Percent 10.0%
		Major	Minor		
			X		
	Matrix Notes	100% of the rule requirement was not met.			
		Adjustment		\$22,500	
				\$2,500	
>> Violation Events					
Number of Violation Events		1		55 Number of violation days	
		daily			
		weekly			
		monthly			
		quarterly			
		semiannual			
		annual			
		single event		x	
		Violation Base Penalty \$2,500			
		One single event is recommended.			
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		\$2,500	
>> Economic Benefit (EB) for this violation					
>> Statutory Limit Test					
Estimated EB Amount		\$12		Violation Final Penalty Total \$3,209	
		This violation Final Assessed Penalty (adjusted for limits)		\$3,209	

Economic Benefit Worksheet

Respondent Isaías Sanchez
Case ID No. 63441
Reg. Ent. Reference No. RN105722136
Media Municipal Solid Waste
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)	\$100	20-Oct-2022	25-Feb-2025	2.35	\$12	n/a	\$12

Notes for DELAYED costs

Estimated other cost to mark the TCEQ registration number to both sides of the sludge transportation vehicle. The Date Required is the investigation date, 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

\$100

TOTAL

\$12

Screening Date 14-Dec-2022 Respondent Isaias Sanchez Case ID No. 63441 Reg. Ent. Reference No. RN105722136 Media Municipal Solid Waste Enf. Coordinator Taylor Williamson	Docket No. 2024-0744-SLG-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 § 312.143(a) and Tex. Water Code § 26.121(a)(1)		
Violation Description	Failed to deposit wastes at a facility designated by or acceptable to the generator where the owner or operator of the facility agrees to receive the wastes and the facility has written authorization by permit or registration issued by the executive director to receive wastes. Specifically, the Respondent admitted to disposing of sewage at 15241 County Road 1105 in Flint, Smith County, Texas ("Property") when the City of Tyler Wastewater Treatment Plant was unable to accept loads on the weekend or to avoid the wastewater treatment plant disposal fees. One of the Business's vehicles with Texas license plate number BWD-8370 was documented discharging domestic septage at the Property on October 20, 2022. The Property contained numerous areas saturated with domestic septage and sludge solids that indicated the sludge hauler had been continuously dumping at the Property. One of the discharges was observed flowing off the Property onto an adjacent property located south of the Property line.		

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

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

Adjustment	\$18,750
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	\$6,250
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Violation Events

Number of Violation Events	2	55	Number of violation days
	daily		
	weekly		
	monthly	x	
	quarterly		
	semiannual		
	annual		
	single event		

Violation Base Penalty	\$12,500
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Two monthly events are recommended from the investigation date (October 20, 2022) to the screening date (December 14, 2022).	
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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	\$12,500
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Economic Benefit (EB) for this violation

Estimated EB Amount	Statutory Limit Test
\$798	

Violation Final Penalty Total	\$16,045
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This violation Final Assessed Penalty (adjusted for limits)	\$16,045
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Economic Benefit Worksheet

Respondent Isaias Sanchez
Case ID No. 63441
Reg. Ent. Reference No. RN105722136
Media Municipal Solid Waste
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
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	\$2,000	20-Oct-2022	25-Feb-2025	2.35	\$235	n/a	\$235
Remediation/Disposal	\$500	20-Oct-2022	25-Feb-2025	2.35	\$59	n/a	\$59
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	<p>Estimated remediation cost to cover the exposed sludge with soil and properly clean and disinfect the affected area. The Date Required is the investigation date, and the Final Date is the estimated date of compliance.</p> <p>Estimated training cost to update the Business's operational procedures and conduct training to ensure that sludge is disposed of at a properly permitted or registered facility. The Date Required is the investigation date, and the Final Date is the estimated date of compliance.</p>						
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	\$500	20-Oct-2022	14-Dec-2022	0.15	\$4	\$500	\$504
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs	<p>Estimated avoided cost to pay the wastewater treatment plant disposal fees. The Date Required is the investigation date, and the Final Date is the screening date.</p>						
Approx. Cost of Compliance	\$3,000			TOTAL		\$798	



Compliance History Report

Compliance History Report for CN605431162, RN105722136, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner/Operator: CN605431162, Isaias Sanchez **Classification:** UNCLASSIFIED **Rating:** -----

Regulated Entity: RN105722136, SANCHEZ SEPTIC TANK SVC **Classification:** UNCLASSIFIED **Rating:** -----

Complexity Points: 1 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 312 East Rosedale Street, Tyler, Smith County, Texas

TCEQ Region: REGION 05 - TYLER

ID Number(s):
SLUDGE REGISTRATION 24123 **WATER QUALITY NON PERMITTED ID NUMBER** R05105722136

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

Date Compliance History Report Prepared: August 20, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: August 20, 2019 to August 20, 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:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

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

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
ISAIAS SANCHEZ
RN105722136

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

AGREED ORDER DOCKET NO. 2024-0744-SLG-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 Isaias Sanchez (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a registered sludge transporter business located at 312 East Rosedale Street in Tyler, Smith County, Texas (the "Business"). The Business involves or involved the management of municipal solid waste as defined in TEX. HEALTH & SAFETY CODE ch. 361. The Respondent holds and maintains sludge transporter registration No. 24123 issued by the TCEQ on April 27, 2009, which authorizes the Respondent to transport sewage sludge, water treatment sludge, domestic septage, chemical toilet waste, grit trap waste, and grease trap waste. Therefore, the Respondent is subject to TCEQ jurisdiction pursuant to 30 TEX. ADMIN. CODE ch. 312, Subchapter G.
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, TEX. WATER CODE ch. 26, and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$19,254 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$564 of the penalty. The remaining amount of \$18,690 shall be paid in 35 monthly payments of \$534 each. The first monthly payment shall be paid within 30 days after the effective date of this Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until the penalty is paid in full. If the Respondent fails to comply with the payment requirements of this Order, including the payment schedule, the Executive Director may accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. The Respondent's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance

constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms of this Order and 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 an investigation at the Business conducted from October 20, 2022 through October 26, 2022, an investigator documented that the Respondent:

1. Failed to prominently mark vehicles used to collect and transport wastes, in violation of 30 TEX. ADMIN. CODE § 312.144(a)(4). Specifically, the 2008 Ford with Texas license plate number PPJ-4070 did not display the TCEQ registration number on either side of the vehicle.
2. Failed to deposit wastes at a facility designated by or acceptable to the generator where the owner or operator of the facility agrees to receive the wastes and the facility has written authorization by permit or registration issued by the executive director to receive wastes, in violation of 30 TEX. ADMIN. CODE § 312.143(a) and TEX. WATER CODE § 26.121(a)(1). Specifically, the Respondent admitted to disposing of sewage at 15241 County Road 1105 in Flint, Smith County, Texas ("Property") when the City of Tyler Wastewater Treatment Plant was unable to accept loads on the weekend or to avoid the wastewater treatment plant disposal fees. One of the Business's vehicles with Texas license plate number BWD-8370 was documented discharging domestic septage at the Property on October 20, 2022. The Property contained numerous areas saturated with domestic septage and sludge solids that indicated the sludge hauler had been continuously dumping at the Property. One of the discharges was observed flowing off the Property onto an adjacent property located south of the Property line.

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: Isaias Sanchez, Docket No. 2024-0744-SLG-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. Immediately on the effective date of this Order, cease the unauthorized disposal of sludge waste.
 - b. Within 30 days after the effective date of this Order:
 - i. Mark the TCEQ registration number on both sides of the unmarked sludge transportation vehicle (2008 Ford with Texas license plate number PPJ-4070), in accordance with 30 TEX. ADMIN. CODE § 312.144(a)(4);
 - ii. Cover the exposed domestic septage, and clean and disinfect the affected area at 15241 County Road 1105 in Flint, Smith County, Texas with soil; and
 - iii. Update the Business's operational procedures and conduct training to ensure that sludge is disposed of at a properly permitted or registered facility.
 - c. Within 45 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 No. 2.a. 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
Tyler Regional Office
Texas Commission on Environmental Quality
2916 Teague Drive
Tyler, Texas 75701-3734

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Business operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively,

the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Kriste Mello-Jurack

For the Executive Director

Date

06/20/2025

Date

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

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

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

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

[Signature]

Signature

3.17.25

Date

Isaias Sanchez

Name (Printed or typed)
Authorized Representative of
Isaias Sanchez

Owner

Title

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

*15241 CR 1103
Flint TX 75762*

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.