

Executive Summary - Enforcement Matter - Case No. 64550
STEEL DYNAMICS SOUTHWEST, LLC
RN110750965
Docket No. 2025-0076-IWD-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:

IWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Sinton Mill Facility, 8534 State Highway 89, Sinton, San Patricio County

Type of Operation:

Iron and steel manufacturing and coil coating facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Past-Due Fees: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: December 26, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$121,600

Total Paid to General Revenue: \$60,800

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$60,800

Name of SEP: Texas Water Development Board (Third-Party Pre-Approved)

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: July 29, 2022

Date(s) of NOE(s): August 26, 2022

Executive Summary - Enforcement Matter - Case No. 64550
STEEL DYNAMICS SOUTHWEST, LLC
RN110750965
Docket No. 2025-0076-IWD-E

Violation Information

Failed to comply with permitted effluent limitations for pH, total suspended solids, total chromium, total iron, oil and grease, and total zinc [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0005283000, Outfall No. 001 Effluent Limitations and Monitoring Requirements No. 2 and Other Requirements No. 9, Outfall Nos. 002, 003, and 004 Effluent Limitations and Monitoring Requirements No. 2, and Outfall No. 201 Effluent Limitations and Monitoring Requirements Nos. 1 and 2].

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. WQ0005283000, 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: Harley Hobson, Enforcement Division, Enforcement Team 1, MC 219, (512) 239-1337; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

TCEQ SEP Coordinator: Stuart Beckley, Enforcement Division, MC 219, (512) 239-3565

SEP Third-Party Administrator: Texas Water Development Board, P.O. Box 13231, Austin, Texas 78711

Respondent: Mark D. Millett, President, STEEL DYNAMICS SOUTHWEST, LLC, 7575 West Jefferson Boulevard, Fort Wayne, Indiana, 46804

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned PCW	5-Dec-2022 30-Jun-2025	Screening	17-Aug-2023	EPA Due	
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RESPONDENT/FACILITY INFORMATION	
Respondent	STEEL DYNAMICS SOUTHWEST, LLC
Reg. Ent. Ref. No.	RN110750965
Facility/Site Region	14-Corpus Christi
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	64550	No. of Violations	4
Docket No.	2025-0076-IWD-E	Order Type	Findings
Media Program(s)	Water Quality	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Harley Hobson
		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	\$80,000
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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	52.0% Adjustment	Subtotals 2, 3, & 7	\$41,600
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Notes: Enhancements for ten months of self-reported effluent violations and one NOV with dissimilar violations.

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	\$5,515	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$30,000	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$121,600
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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	\$121,600
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$121,600
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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	\$121,600
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Screening Date 17-Aug-2023

Docket No. 2025-0076-IWD-E

PCW

Respondent STEEL DYNAMICS SOUTHWEST, LLC

Policy Revision 5 (January 28, 2021)

Case ID No. 64550

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN110750965

Media Water Quality

Enf. Coordinator Harley Hobson

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>)	10	50%
	Other written NOVs	1	2%
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) 52%

>> 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

Enhancements for ten months of self-reported effluent violations and one NOV with dissimilar violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 52%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 52%

Screening Date 17-Aug-2023 **Docket No.** 2025-0076-IWD-E **PCW**
Respondent STEEL DYNAMICS SOUTHWEST, LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 64550 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN110750965
Media Water Quality
Enf. Coordinator Harley Hobson

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. WQ0005283000, Outfall No. 001 Effluent Limitations and Monitoring Requirements No. 2, Other Requirement No. 9, and Outfall Nos. 002 and 004 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			Percent
		Major	Moderate	Minor	
	Actual	X			50.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes An evaluation of total suspended solids ("TSS") and pH was completed to determine whether the discharged amounts of pollutants exceeded protective levels. Human health or the environment has been exposed to pollutants which 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 5 90 Number of violation days

daily	
weekly	
monthly	X
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$62,500

Five monthly events are recommended, one month for Outfall No. 001 for the month of December 2021, three months for Outfall No. 002 for the months of December 2021, January 2022, and February 2022, and one month for Outfall No. 004 for the month of December 2021.

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 \$62,500

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$5,515 **Violation Final Penalty Total** \$95,000

This violation Final Assessed Penalty (adjusted for limits) \$95,000

Economic Benefit Worksheet

Respondent STEEL DYNAMICS SOUTHWEST, LLC
Case ID No. 64550
Reg. Ent. Reference No. RN110750965
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)	\$30,000	31-Dec-2021	3-Sep-2025	3.68	\$5,515	n/a	\$5,515

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 end date of the first month 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 \$30,000

TOTAL \$5,515

Screening Date	17-Aug-2023	Docket No.	2025-0076-IWD-E	PCW
Respondent	STEEL DYNAMICS SOUTHWEST, LLC			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	64550			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN110750965			
Media	Water Quality			
Enf. Coordinator	Harley Hobson			
Violation Number	2			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0005283000, Outfall No. 001 Effluent Limitations and Monitoring Requirements No. 2 and Other Requirement No. 9			
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
 An evaluation of pH was completed to determine whether the discharged amounts of pollutants exceeded protective levels. 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.

Adjustment \$18,750

\$6,250

Violation Events

Number of Violation Events 1 31 Number of violation days

daily	
weekly	
monthly	X
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$6,250

One monthly event is recommended for the month of January 2022.

Good Faith Efforts to Comply 0.0% Reduction \$0

	Before NOE/NOV	NOE/NOV to EDRP/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 **Statutory Limit Test**

Estimated EB Amount \$0 **Violation Final Penalty Total** \$9,500

This violation Final Assessed Penalty (adjusted for limits) \$9,500

Economic Benefit Worksheet

Respondent STEEL DYNAMICS SOUTHWEST, LLC
Case ID No. 64550
Reg. Ent. Reference No. RN110750965
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

Estimated cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations captured in Economic Benefit 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

\$0

TOTAL

\$0

Screening Date 17-Aug-2023 **Docket No.** 2025-0076-IWD-E **PCW**
Respondent STEEL DYNAMICS SOUTHWEST, LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 64550 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN110750965
Media Water Quality
Enf. Coordinator Harley Hobson

Violation Number 3

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0005283000, Outfall No. 001 Effluent Limitations and Monitoring Requirements No. 2, Other Requirement No. 9, and Outfall No. 003 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			Percent
		Major	Moderate	Minor	
	Actual			X	15.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes An evaluation of TSS and pH was completed to determine whether the discharged amounts of pollutants exceeded protective levels. Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 2 120 Number of violation days

daily	
weekly	
monthly	
quarterly	X
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

Two quarterly events are recommended, one for Outfall No. 001 for the quarter containing the months of February, March, and April 2022 and one for Outfall No. 003 for the quarter containing the month of December 2021.

Good Faith Efforts to Comply 0.0% Reduction \$0

	Before NOE/NOV	NOE/NOV to EDRP/ Settlement Offer
Extraordinary		
Ordinary		
N/A	X	

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

Violation Subtotal \$7,500

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$0 **Violation Final Penalty Total** \$11,400

This violation Final Assessed Penalty (adjusted for limits) \$11,400

Economic Benefit Worksheet

Respondent STEEL DYNAMICS SOUTHWEST, LLC
Case ID No. 64550
Reg. Ent. Reference No. RN110750965
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

Estimated cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations captured in Economic Benefit 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

\$0

TOTAL

\$0

Screening Date 17-Aug-2023 **Docket No.** 2025-0076-IWD-E **PCW**
Respondent STEEL DYNAMICS SOUTHWEST, LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 64550 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN110750965
Media Water Quality
Enf. Coordinator Harley Hobson

Violation Number 4
Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0005283000, Outfall No. 201 Effluent Limitations and Monitoring Requirements Nos. 1 and 2
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			Percent
		Major	Moderate	Minor	
	Actual				15.0%
	Potential	x			

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes
 An evaluation of total chromium, total iron, oil and grease, pH, TSS, and total zinc was completed to determine whether the discharged amounts of pollutants exceeded protective levels. Human health or the environment will or could be exposed to pollutants that would 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 1 151 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$3,750

One single event is recommended.

Good Faith Efforts to Comply 0.0% Reduction \$0

	Before NOE/NOV	NOE/NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	

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

Violation Subtotal \$3,750

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$0 **Violation Final Penalty Total** \$5,700

This violation Final Assessed Penalty (adjusted for limits) \$5,700

Economic Benefit Worksheet

Respondent STEEL DYNAMICS SOUTHWEST, LLC
Case ID No. 64550
Reg. Ent. Reference No. RN110750965
Media Water Quality
Violation No. 4

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

Estimated cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations captured in Economic Benefit 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

\$0

TOTAL

\$0

STEEL DYNAMICS SOUTHWEST, LLC
 TPDES Permit No. WQ0005283000
 Docket No. 2025-0076-IWD-E
 Case No. 64550

Effluent Violation Table

	Outfall 001				Outfall 002	Outfall 003	Outfall 004
	pH Range Excursions >60 Minutes, Monthly Total	pH Range Excursions Monthly Total Acc.	pH Min.	pH Max.	TSS Daily Max. Conc.	TSS Daily Max. Conc.	TSS Daily Max. Conc.
Monitoring Period	Limit = 0	Limit = 446 Monthly Minutes Total	Limit = 6.0 SU	Limit = 9 SU	Limit = 100 mg/L	Limit = 100 mg/L	Limit = 100 mg/L
December 2021	1	1,228	2.8	12.3	6,600	484	8,660
January 2022	2	760	4.2	11.4	4,380	c	c
February 2022	c	551	2.6	c	2,880	c	c
March 2022	c	c	3.5	c	c	c	c
April 2022	c	c	4.3	c	c	c	c

Outfall 201

	Total Chromium Daily Avg. Loading	Total Chromium Daily Max. Loading	Total Iron Daily Avg. Loading	Total Iron Daily Max. Loading	Oil and Grease Daily Avg. Loading	Oil and Grease Daily Max. Loading
Monitoring Period	Limit = 0.102 lbs/day	Limit = 0.249 lbs/day	Limit = 0.420 lbs/day	Limit = 0.860 lbs/day	Limit = 6.61 lbs/day	Limit = 6.64 lbs/day
December 2021	0.103	c	c	c	10.4	14.0
January 2022	c	c	c	c	c	9.3
February 2022	c	c	c	c	21.9	25.52
March 2022	0.211	0.63	3.43	8.16	108.46	206.2
April 2022	0.109	0.252	1.52	3.63	9.44	19.08

Outfall 201						
	pH Min.	pH Max.	TSS Daily Avg. Loading	TSS Daily Max. Loading	Total Zinc Daily Avg. Loading	Total Zinc Daily Max. Loading
Monitoring Period	Limit = 7.5 SU	Limit = 10.0 SU	Limit = 7.92 lbs/day	Limit = 9.92 lbs/day	Limit = 0.278 lbs/day	Limit = 0.712 lbs/day
December 2021	c	12.5	c	c	c	c
January 2022	c	11.8	c	c	c	c
February 2022	4.1	12.4	57.04	75.84	c	c
March 2022	1.6	11.4	23.97	47.18	0.726	1.49
April 2022	7.4	12	19.33	50.03	1.041	2.894

Acc. = accumulation SU = standard units Min. = minimum Max. = maximum
 Conc. = concentration Avg. = average c = compliant
 lbs/day = pounds per day TSS = total suspended solids mg/L = milligrams per liter



Compliance History Report

Compliance History Report for CN605646041, RN110750965, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN605646041, STEEL DYNAMICS SOUTHWEST, LLC **Classification:** SATISFACTORY **Rating:** 3.09

Regulated Entity: RN110750965, STEEL DYNAMICS SOUTHWEST **Classification:** SATISFACTORY **Rating:** 3.09

Complexity Points: 21 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 8534 State Highway 89 near Sinton, San Patricio County, Texas

TCEQ Region: REGION 14 - CORPUS CHRISTI

ID Number(s):

AIR OPERATING PERMITS PERMIT 4324	AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1562M1
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1562	AIR NEW SOURCE PERMITS PERMIT 156458
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX194	AIR NEW SOURCE PERMITS AFS NUM 4840900250
PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 91342	PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 92014
PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 92015	PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 92082
PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 92012	PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 92013
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 97910	WASTEWATER PERMIT WQ0005283000
WASTEWATER EPA ID TX0139629	WASTEWATER PERMIT 2E0000291
AIR EMISSIONS INVENTORY ACCOUNT NUMBER SDA019Q	POLLUTION PREVENTION PLANNING ID NUMBER P10907
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000085550	INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 97910
TAX RELIEF ID NUMBER 23746	TAX RELIEF ID NUMBER 23772
TAX RELIEF ID NUMBER 25849	TAX RELIEF ID NUMBER 27777
TAX RELIEF ID NUMBER 27778	

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

Date Compliance History Report Prepared: June 30, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: June 30, 2020 to June 30, 2025

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

Name: Harley Hobson

Phone: (512) 239-1337

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.):

Item 1	October 20, 2021	(1772580)	Item 4	March 22, 2023	(1886624)
Item 2	November 15, 2021	(1786145)	Item 5	June 19, 2024	(2006113)
Item 3	December 27, 2021	(1793136)	Item 6	January 13, 2025	(2034699)

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: 06/30/2024 (2013673)		
	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: 07/31/2024 (2019484)		
	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: 08/31/2024 (2026274)		
	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: 09/30/2024 (2032379)		
	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: 10/31/2024 (2038688)		
	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: 11/30/2024 (2045149)		
	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: 12/31/2024 (2051659)		
	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: 01/31/2025 (2059183)		
	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: 02/28/2025 (2067767)		
	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: 03/31/2025 (2074582)		
	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: 05/19/2025 (2062780)		
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 335, SubChapter A 335.6(b)		

Description: Failure to update the Notice of Registration with updated contact information.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter A 335.6
Description: Failure to notify the executive director of changed and new information.
Specifically, during the investigation conducted on April 22, 2025, it was noted that the facility failed notify of changed activities TWC 0030319H; according to the facility this TWC is no longer being managed as a solid waste and is not being recycled on-site.

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

30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

- 9 Date: 07/31/2022 (1851297)
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: 08/31/2022 (1858716)
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: 09/30/2022 (1865058)
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: 10/31/2022 (1871945)
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: 11/30/2022 (1877824)
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: 12/31/2022 (1884634)
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: 01/31/2023 (1892427)
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: 02/28/2023 (1901024)
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: 03/13/2023 (1868117)
 Self Report? NO Classification: Minor
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 GCs & SC 67.G PA
 Description: Failure to maintain visible fugitive emission records as required. Specifically, Steel Dynamics Southwest LLC (SDI) – Steel Dynamics Southwest (Sinton Mill) failed to maintain Calendar Year 2022 quarterly visible fugitive emission observations from the scrap loading/unloading and roads and travel areas.
- 18 Date: 03/31/2023 (1907818)
 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: 04/30/2023 (1914953)
 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: 05/31/2023 (1921585)
 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: 06/30/2023 (1928562)
 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: 07/21/2023 (1910493)
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 324, SubChapter A 324.1
 40 CFR Chapter 279, SubChapter I, PT 279, SubPT C 279.24
 Description: Failure to ensure that used oil is transported only by transporters who have obtained EPA identification numbers.
- 23 Date: 07/31/2023 (1935478)
 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: 08/31/2023 (1941724)
 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: 09/30/2023 (1948481)
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: 10/31/2023 (1954152)
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: 11/20/2023 (1937703)
Self Report? NO Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Permit Conditions No. 2g, Pg. 8 PERMIT
Description: Failed to prevent an unauthorized discharge of wastewater or any other waste.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Reporting Requirement No. 7.c., Pg. 6 PERMIT
Description: Failed to report any effluent violation which deviates from the permitted effluent limitation by more than 40% in writing to the Regional Office and the Enforcement Division (MC 224) within 5 working days of becoming aware of the noncompliance.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Other Requirements No. 11, Pg. 19 PERMIT
Description: Failed to properly implement the SWP3 to eliminate or lessen the exposure of stormwater to industrial activities and pollutants.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 319, SubChapter A 319.11(a)
30 TAC Chapter 319, SubChapter A 319.11(b)
Monitoring Requirements No. 2.a., Pg. 5 PERMIT
Description: Failed to properly collect samples according to the procedures specified in 30 TAC § 319.11-319.12.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 319, SubChapter A 319.11(c)
30 TAC Chapter 319, SubChapter A 319.6
Reporting Requirements; No. 2.a, Pg. 5 PERMIT
Description: Failed to analyze the effluent according to test methods specified in 40 CFR Part 136 or more recent editions of Standard Methods for the Examination of Water and Wastewater than those cited in Part 136.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(9)(B)(ii)
Other Requirements No. 2, Pg. 14 PERMIT
Description: Failed to report violations of daily maximum limitations for the pollutants listed in the Other Requirements No. 2 section of the TPDES permit orally or by facsimile to TCEQ Region 14 within 24 hours from the time the permittee

became aware of the violations followed by a written report within five working days to TCEQ Region 14 and the Enforcement Division (MC 224).

Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(5)
Operational Requirements No. 1, Pg. 10 PERMIT
Description: Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained.

28* Date: 11/30/2023 (1963960)
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: 12/11/2023 (1936674)
Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
SC 10 OP
Description: Failure to prevent visible fugitive emissions leaving the property from the meltshop building, rolling mill building, scrap loading/unloading, roads, and travel areas for more than 30 cumulative seconds in any six-minute period.

30* Date: 12/31/2023 (1970524)
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: 01/31/2024 (1979605)
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

32* Date: 02/29/2024 (1986165)
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: 03/31/2024 (1992717)
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: 04/09/2024 (1972553)
Self Report? NO Classification: Moderate
Citation:
[PSD TX1562M1/GHG PSD TX194] GCs & SC 34C PA
30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)

Description: Failure to conduct the temperature sensor accuracy audit once every six months or at a longer frequency according to the manufacturer's recommendations for the Paint Line 1 thermal control device.

- 35* Date: 04/30/2024 (1999149)
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: 06/30/2024 (2013673)
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: 07/31/2024 (2019484)
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: 08/31/2024 (2026274)
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: 09/30/2024 (2032379)
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: 10/31/2024 (2038688)
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: 11/30/2024 (2045149)
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: 12/31/2024 (2051659)
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

43 Date: 01/31/2025 (2059183)
 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

44 Date: 02/28/2025 (2067767)
 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

45 Date: 03/31/2025 (2074582)
 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

46 Date: 05/19/2025 (2062780)
 Self Report? NO Classification: Minor
 Citation:

30 TAC Chapter 335, SubChapter A 335.6(b)
 Description: Failure to update the Notice of Registration with updated contact information.
 Self Report? NO Classification: Minor
 Citation:

30 TAC Chapter 335, SubChapter A 335.6
 Description: Failure to notify the executive director of changed and new information.
 Specifically, during the investigation conducted on April 22, 2025, it was noted that the facility failed notify of changed activities TWC 0030319H; according to the facility this TWC is no longer being managed as a solid waste and is not being recycled on-site.

* NOVs applicable for the Compliance History rating period 9/1/2019 to 8/31/2024

Appendix B
All Investigations Conducted During Component Period June 30, 2020 and June 30, 2025

Item 1	June 25, 2021**	(1722547)
Item 2*	October 20, 2021**	(1772580)
Item 3*	November 15, 2021**	(1786145)
Item 4*	December 27, 2021**	(1793136)
Item 5	January 20, 2022**	(1800955)
Item 6	February 16, 2022**	(1808781)
Item 7	March 19, 2022**	(1815886)
Item 8	April 20, 2022**	(1822465)
Item 9	July 01, 2022**	(1831316)
Item 10	July 19, 2022**	(1844764)
Item 11	August 18, 2022**	(1851297)
Item 12	August 30, 2022**	(1833723)
Item 13	September 19, 2022**	(1858716)
Item 14	October 18, 2022**	(1865058)

Item 15	November 18, 2022**	(1871945)
Item 16*	December 01, 2022**	(1854567)
Item 17	December 15, 2022**	(1877824)
Item 18	January 19, 2023**	(1884634)
Item 19	February 14, 2023**	(1892427)
Item 20	March 16, 2023**	(1901024)
Item 21*	March 22, 2023**	(1886624)
Item 22	April 17, 2023**	(1907818)
Item 23	May 18, 2023**	(1914953)
Item 24	June 19, 2023**	(1921585)
Item 25	July 18, 2023**	(1928562)
Item 26	July 26, 2023**	(1910493)
Item 27	August 18, 2023**	(1935478)
Item 28	August 24, 2023**	(1923035)
Item 29	September 18, 2023**	(1941724)
Item 30	October 19, 2023**	(1948481)
Item 31	November 17, 2023**	(1954152)
Item 32	November 20, 2023**	(1937703)
Item 33	December 20, 2023**	(1963960)
Item 34	January 19, 2024**	(1970524)
Item 35	January 26, 2024**	(1955335)
Item 36	February 20, 2024**	(1979605)
Item 37	March 20, 2024**	(1986165)
Item 38	April 19, 2024**	(1992717)
Item 39	May 20, 2024**	(1999149)
Item 40*	June 19, 2024**	(2006113)
Item 41	July 20, 2024**	(2013673)
Item 42	August 20, 2024**	(2019484)
Item 43	September 20, 2024	(2026274)
Item 44	October 18, 2024	(2032379)
Item 45	November 14, 2024	(1974104)
Item 46	November 20, 2024	(2038688)
Item 47	December 18, 2024	(2045149)
Item 48*	January 13, 2025	(2034699)
Item 49	January 17, 2025	(2051659)
Item 50	February 20, 2025	(2059183)
Item 51	March 20, 2025	(2067767)
Item 52	April 17, 2025	(2074582)
Item 53	May 19, 2025	(2062780)

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2019 and 08/31/2024.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
STEEL DYNAMICS SOUTHWEST, LLC
RN110750965

§ BEFORE THE
§ TEXAS COMMISSION ON
§ ENVIRONMENTAL QUALITY
§

AGREED ORDER DOCKET NO. 2025-0076-IWD-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding STEEL DYNAMICS SOUTHWEST, LLC (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 an iron and steel manufacturing and coil coating facility located at 8534 State Highway 89, in Sinton, San Patricio 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 July 29, 2022, an investigator documented that the Respondent did not comply with permitted effluent limitations, as shown in the effluent violation tables below:

Effluent Violation Tables							
	Outfall 001				Outfall 002	Outfall 003	Outfall 004
	pH Range Excursions >60 Minutes, Monthly Total	pH Range Excursions Monthly Total Acc.	pH Min.	pH Max.	TSS Daily Max. Conc.	TSS Daily Max. Conc.	TSS Daily Max. Conc.
Monitoring Period	Limit = 0	Limit = 446 Monthly Minutes Total	Limit = 6.0 SU	Limit = 9 SU	Limit = 100 mg/L	Limit = 100 mg/L	Limit = 100 mg/L
December 2021	1	1,228	2.8	12.3	6,600	484	8,660
January 2022	2	760	4.2	11.4	4,380	c	c
February 2022	c	551	2.6	c	2,880	c	c
March 2022	c	c	3.5	c	c	c	c
April 2022	c	c	4.3	c	c	c	c

Outfall 201						
	Total Chromium Daily Avg. Loading	Total Chromium Daily Max. Loading	Total Iron Daily Avg. Loading	Total Iron Daily Max. Loading	Oil and Grease Daily Avg. Loading	Oil and Grease Daily Max. Loading
Monitoring Period	Limit = 0.102 lbs/day	Limit = 0.249 lbs/day	Limit = 0.420 lbs/day	Limit = 0.860 lbs/day	Limit = 6.61 lbs/day	Limit = 6.64 lbs/day
December 2021	0.103	c	c	c	10.4	14.0
January 2022	c	c	c	c	c	9.3
February 2022	c	c	c	c	21.90	25.52
March 2022	0.211	0.63	3.43	8.16	108.46	206.2
April 2022	0.109	0.252	1.52	3.63	9.44	19.08

Outfall 201						
	pH Min.	pH Max.	TSS Daily Avg. Loading	TSS Daily Max. Loading	Total Zinc Daily Avg. Loading	Total Zinc Daily Max. Loading
Monitoring Period	Limit = 7.5 SU	Limit = 10.0 SU	Limit = 7.92 lbs/day	Limit = 9.92 lbs/day	Limit = 0.278 lbs/day	Limit = 0.712 lbs/day
December 2021	c	12.5	c	c	c	c
January 2022	c	11.8	c	c	c	c
February 2022	4.1	12.4	57.04	75.84	c	c
March 2022	1.6	11.4	23.97	47.18	0.726	1.49
April 2022	7.4	12	19.33	50.03	1.041	2.894

Acc. = accumulation SU = standard units Min. = minimum Max. = maximum
Conc. = concentration Avg. = average c = compliant
lbs/day = pounds per day TSS = total suspended solids mg/L = milligrams per liter

II. CONCLUSIONS OF LAW

- 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.
- 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. WQ0005283000, Outfall No. 001 Effluent Limitations and Monitoring Requirements No. 2 and Other Requirements No. 9, Outfall Nos. 002, 003, and 004 Effluent Limitations and Monitoring Requirements No. 2, and Outfall No. 201 Effluent Limitations and Monitoring Requirements Nos. 1 and 2.
- 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.
- An administrative penalty in the amount of \$121,600 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 \$60,800 of the penalty. Pursuant to TEX. WATER CODE § 7.067, \$60,800 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms and conditions of this Order, which

includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

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: STEEL DYNAMICS SOUTHWEST, LLC, Docket No. 2025-0076-IWD-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The Respondent shall implement and complete the SEP as set forth in Conclusion of Law No. 4. The amount of \$60,800 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
3. 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. WQ0005283000, 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, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. 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
Corpus Christi Regional Office
Texas Commission on Environmental Quality
500 North Shoreline Boulevard, Suite 500
Corpus Christi, Texas 78401

4. All relief not expressly granted in this Order is denied.
5. 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.
6. 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.
7. 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.
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. 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.
10. 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.

11. 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

Krista Mello-Jurack

02/15/2026

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.

DLB

Signature

11/26/25

Date

Dennis L. Black

Name (Printed or typed)

General Manager

Title

Authorized Representative of
STEEL DYNAMICS SOUTHWEST, LLC

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

Attachment A

Docket Number: 2025-0076-IWD-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	STEEL DYNAMICS SOUTHWEST, LLC
Penalty Amount:	\$121,600
SEP Offset Amount:	\$60,800
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Texas Water Development Board
Project Name:	<i>Water-Level Recorder Data in Texas</i>
Total Project Budget:	\$648,829.50
Location of SEP:	Statewide; Preference for San Patricio County

The Texas Commission on Environmental Quality (“TCEQ”) agrees to offset a portion of the administrative penalty amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project (“SEP”). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon compliance with the terms of this Attachment A.

1. **Project Description**

A. *Project*

The Respondent shall contribute the SEP Offset Amount to the **Texas Water Development Board**, as a Third-Party Administrator, for its *Water Level Recorder Data in Texas* project (the “Project”). The Project is to purchase, install, and maintain automatic water-level recorders in unused wells to satisfy updated network objectives of up to two recorders per recognized aquifer per county in Texas. The Third-Party Administrator shall use the SEP Offset Amount to perform the Project. The Project will be done in accordance with all federal, state, and local environmental laws and regulations. The contribution will be used in accordance with the SEP Agreement between the Third-Party Administrator and TCEQ.

All dollars contributed will be used solely for the cost of implementing the Project, including for supplies, materials, and equipment. Any portion of this contribution that is not spent on the specifically identified SEP may, at the discretion of the Executive Director (“ED”), be applied to another pre-approved SEP.

The Respondent’s signature affixed to this Agreed Order certifies that the Respondent has no prior commitment to make this contribution and that it is being contributed solely to settle this enforcement action. The Respondent shall not profit in any manner from this SEP.

B. *Environmental Benefit*

The groundwater stored within Texas’ major and minor aquifers is an important natural resource that is relied upon to meet the water supply demands of Texans across the state. Many factors affect the availability of this resource, including drought and increased demand. This Project will further provide real-time statewide comprehensive groundwater level data to Texas counties, cities, groundwater conservation districts, water supply companies, and individual well owners. The availability of this comprehensive data will promote awareness of the effects of drought on Texas’ aquifers and assist in groundwater management planning and use statewide.

C. *Minimum Expenditure*

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Administrator and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Administrator. The Respondent shall make the contribution payable to the **Texas Water Development Board**, and mail it with a copy of the Agreed Order to:

Texas Water Development Board
Attention: Finance
P.O. Box 13231
Austin, Texas 78711

3. Records and Reporting

Together with the payment of the SEP Offset Amount, the Respondent shall provide the Enforcement SEP Coordinator with proof of payment and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Administrator. The Respondent shall mail or email a copy of the proof of payment and transmittal letter to:

Texas Commission on Environmental Quality
Enforcement Division
Attention: SEP Coordinator, MC 219
P.O. Box 13087
Austin, Texas 78711-3087
SEPReports@tceq.texas.gov

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the ED may require immediate payment of all or part of the SEP Offset Amount to TCEQ.

In the event the ED determines that the Respondent failed to fully implement and complete the contribution to the Project, the Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the contribution to the SEP, the Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for the reimbursement of a SEP, shall make the check payable to "Texas Commission on Environmental Quality," and shall mail it to the SEP coordinator at the address provided above.

5. Publicity

Any public statements concerning this SEP and/or project, made by or on behalf of the Respondent, must include a clear statement that the contribution to the project was performed as part of the settlement of an enforcement action brought by TCEQ. Such statements include advertising, public relations, and press releases.

6. Recognition

The Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP Offset Amount identified in this Attachment A and in the attached Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with TCEQ or any other agency of the state or federal government.