

Brooke T. Paup, *Chairwoman*
Catarina R. Gonzales, *Commissioner*
Tonya Miller, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 13, 2026

To: Persons on the Attached Mailing List (via email only)

Re: Executive Director's Request for Remand regarding an Agreed Order concerning THE CENTER FOR PURSUIT; TCEQ Docket No. 2025-1009-MWD-E.

The above-referenced matter is currently scheduled to be considered by the Texas Commission on Environmental Quality at its January 14, 2026, public meeting. However, the Executive Director filed a request to remand this item on January 13, 2026 for additional case development. Pursuant to 30 TAC § 10.4, this matter is hereby remanded to the Executive Director.

If you have any questions about this matter, please contact Colleen Ford, Assistant General Counsel at Colleen.Ford@tceq.texas.gov.

Respectfully,

A handwritten signature in black ink that reads "Mary Smith".

Mary Smith
General Counsel

Mailing List

Mailing List
THE CENTER FOR PURSUIT
TCEQ Docket No. 2025-1009-MWD-E

Charles K. Njuguna, President
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TCEQ Interoffice Memorandum

To: Mary Smith, General Counsel

Thru: AS Amy Settemeyer, Deputy Director
Enforcement Division

From: MP Michael Parrish, Agenda Special Assistant
Enforcement Division

Date: January 13, 2026

**Subject: Request for Remand
January 14, 2026, Commission Agenda
Item No. 22 – THE CENTER FOR PURSUIT
Docket No. 2025-1009-MWD-E**

The Executive Director respectfully requests that the above-referenced item be remanded to staff as the Executive Director has determined that additional case development is necessary.

Respondent Contact:

Charles K. Njuguna, President
The Center for Pursuit
4400 Harrisburg Boulevard
Houston, Texas 77011

cnjuguna@thecenterforpursuit.org

Please do not hesitate to call Michael Parrish at (512) 239-2548 if you have any questions regarding this matter.

cc: Garrett Arthur, Public Interest Counsel
Melissa Schmidt, Public Interest Counsel
Gill Valls, Office of General Counsel
Katherine McKenzie, Agenda Coordinator, Litigation Division
Amy Settemeyer, Deputy Director, Enforcement Division
Megan Hamilton, Acting Assistant Deputy Director, Enforcement Division
Michael Parrish, Agenda Special Assistant, Enforcement Division
Laura Draper, Manager, Water, Enforcement Division
Megan Crinklaw, Team Leader, Water, Enforcement Division
Madison Crawford, Enforcement Coordinator, Water, Enforcement Division

Executive Summary - Enforcement Matter - Case No. 68103
THE CENTER FOR PURSUIT
RN102917069
Docket No. 2025-1009-MWD-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

MWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Willow River Farms, 4073 Farm-to-Market 3318, Pattison, Waller County

Type of Operation:

Wastewater treatment 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: October 17, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$15,000

Amount Deferred for Expedited Settlement: \$3,000

Total Paid to General Revenue: \$12,000

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: May 29, 2025

Date(s) of NOE(s): June 25, 2025

Executive Summary – Enforcement Matter – Case No. 68103
THE CENTER FOR PURSUIT
RN102917069
Docket No. 2025-1009-MWD-E

Violation Information

Failed to maintain authorization to discharge wastewater into or adjacent to any water in the state. Specifically, Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0013466001 expired on January 8, 2025, and the Respondent continued to operate the wastewater treatment facility without authorization [30 TEX. ADMIN. CODE § 305.65].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

On June 12, 2025, the Respondent submitted application for TPDES Permit No. WQ0016826001 for the Facility.

Technical Requirements:

The Order will require the Respondent to, within 300 days, submit written certification, that authorization to operate has been obtained or that operation has ceased until such time that appropriate authorization is obtained.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Madison Crawford, Enforcement Division, Enforcement Team 7, MC 219, (512) 239-4603; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

Respondent: Charles Njuguna, President, THE CENTER FOR PURSUIT, 4400 Harrisburg Boulevard, Houston, Texas 77011

Annie Hunnel, Chief of Staff, THE CENTER FOR PURSUIT, 4400 Harrisburg Boulevard, Houston, Texas 77011

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	30-Jun-2025	Screening	2-Jul-2025	EPA Due	
	PCW	15-Jul-2025				

RESPONDENT/FACILITY INFORMATION	
Respondent	THE CENTER FOR PURSUIT
Reg. Ent. Ref. No.	RN102917069
Facility/Site Region	12-Houston
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	68103	No. of Violations	1
Docket No.	2025-1009-MWD-E	Order Type	1660
Media Program(s)	Water Quality	Government/Non-Profit	Yes
Multi-Media		Enf. Coordinator	Rachel Frey
		EC's Team	Enforcement Team 4
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 adjustment for compliance history.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$2,243
 Estimated Cost of Compliance: \$25,000
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$15,000
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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	\$15,000
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$15,000
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DEFERRAL	20.0%	Reduction	Adjustment	-\$3,000
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY	\$12,000
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Screening Date 2-Jul-2025

Docket No. 2025-1009-MWD-E

PCW

Respondent THE CENTER FOR PURSUIT

Policy Revision 5 (January 28, 2021)

Case ID No. 68103

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN102917069

Media Water Quality

Enf. Coordinator Rachel Frey

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)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

No adjustment 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 2-Jul-2025
Respondent THE CENTER FOR PURSUIT
Case ID No. 68103
Reg. Ent. Reference No. RN102917069
Media Water Quality
Enf. Coordinator Rachel Frey

Docket No. 2025-1009-MWD-E

PCW

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Violation Number 1

Rule Cite(s)

30 Tex. Admin. Code § 305.65

Violation Description

Failed to maintain authorization to discharge waste water into or adjacent to any water in the state. Specifically Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0013466001 expired on January 8, 2025, and the Respondent continued to operate the wastewater treatment facility without authorization.

Base Penalty \$25,000

>> **Environmental, Property and Human Health Matrix**

OR	Release	Harm			Percent
		Major	Moderate	Minor	
		Actual			
Potential					

>> **Programmatic Matrix**

Matrix Notes	Falsification	Major	Moderate	Minor	Percent
			x		

Matrix Notes

100% of rule requirements were not met.

Adjustment \$22,500

\$2,500

Violation Events

Number of Violation Events 6 175 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$15,000

Six monthly events are recommended from the date TPDES Permit No. WQ0013466001 expired (January 8, 2025) to the screening date (July 2, 2025).

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 \$15,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$2,243

Violation Final Penalty Total \$15,000

This violation Final Assessed Penalty (adjusted for limits) \$15,000

Economic Benefit Worksheet

Respondent THE CENTER FOR PURSUIT
Case ID No. 68103
Reg. Ent. Reference No. RN102917069
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	\$25,000	8-Jan-2025	25-Oct-2026	1.79	\$2,243	n/a	\$2,243
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated permit delayed cost is the estimated amount to prepare and submit an application, and obtain authorization to discharge wastewater. Date required is date TPDES Permit No. WQ0013466001 expired. 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

\$25,000

TOTAL

\$2,243



Compliance History Report

Compliance History Report for CN600554588, RN102917069, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN600554588, The Center for Pursuit **Classification:** SATISFACTORY **Rating:** 0.36

Regulated Entity: RN102917069, WILLOW RIVER FARMS **Classification:** SATISFACTORY **Rating:** 0.36

Complexity Points: 5 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 4073 FARM-TO-MARKET ROAD 3318 IN PATTISON, WALLER COUNTY, TEXAS

TCEQ Region: REGION 12 - HOUSTON

ID Number(s):
WASTEWATER EPA ID TX0147982 **WASTEWATER PERMIT WQ0016826001**

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

Date Compliance History Report Prepared: July 01, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: July 01, 2020 to July 01, 2025

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.
Name: Rachel Frey **Phone:** (512) 239-4330

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	July 17, 2020	(1675032)
Item 2	September 11, 2020	(1688378)
Item 3	September 21, 2020	(1681799)
Item 4	October 13, 2020	(1694737)
Item 5	December 11, 2020	(1716800)
Item 6	January 15, 2021	(1716801)
Item 7	February 12, 2021	(1729880)
Item 8	March 12, 2021	(1729881)
Item 9	April 16, 2021	(1729882)
Item 10	May 13, 2021	(1742232)
Item 11	June 14, 2021	(1742233)
Item 12	July 14, 2021	(1753138)

Item 13	August 12, 2021	(1758543)
Item 14	August 27, 2021	(1750113)
Item 15	September 10, 2021	(1767835)
Item 16	October 19, 2021	(1778398)
Item 17	November 17, 2021	(1785069)
Item 18	December 16, 2021	(1792102)
Item 19	January 14, 2022	(1799951)
Item 20	March 14, 2022	(1814826)
Item 21	April 18, 2022	(1821395)
Item 22	May 17, 2022	(1830292)
Item 23	June 15, 2022	(1836542)
Item 24	July 14, 2022	(1843727)
Item 25	August 17, 2022	(1849889)
Item 26	October 12, 2022	(1864012)
Item 27	January 12, 2023	(1883588)
Item 28	March 17, 2023	(1899975)
Item 29	May 18, 2023	(1906775)
Item 30	June 16, 2023	(1920536)
Item 31	July 14, 2023	(1927522)
Item 32	August 18, 2023	(1934463)
Item 33	September 14, 2023	(1940640)
Item 34	October 16, 2023	(1947442)
Item 35	November 13, 2023	(1953128)
Item 36	December 15, 2023	(1962913)
Item 37	January 18, 2024	(1969491)
Item 38	February 15, 2024	(1978569)
Item 39	March 14, 2024	(1985130)
Item 40	May 17, 2024	(1998108)
Item 41	June 17, 2024	(2005075)
Item 42	July 16, 2024	(2012642)
Item 43	August 15, 2024	(2018206)
Item 44	September 17, 2024	(2025244)
Item 45	October 15, 2024	(2031354)
Item 46	November 15, 2024	(2037674)
Item 47	December 16, 2024	(2044065)

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

Component Appendices

Appendix A

All NOV's Issued During Component Period 7/1/2020 and 7/1/2025

1	Date: 10/31/2020 (1716799)		
	Self Report? YES	Classification:	Moderate
	Citation:		
	2D TWC Chapter 26, SubChapter A 26.121(a)		
	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
2	Date: 01/31/2022 (1807783)		
	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: 08/31/2022 (1857658)		
	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: 10/31/2022 (1870921)		
	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: 11/30/2022 (1876778)		
	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: 01/31/2023 (1891402)		
	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: 03/31/2024 (1991674)		
	Self Report? YES	Classification:	Moderate
	Citation:		
	2D TWC Chapter 26, SubChapter A 26.121(a)		
	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		

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

Appendix B

All Investigations Conducted During Component Period July 01, 2020 and July 01, 2025

Item 1*	July 17, 2020**	(1675032)
Item 2*	September 11, 2020**	(1688378)
Item 3*	September 21, 2020**	(1681799)
Item 4*	October 13, 2020**	(1694737)
Item 5	November 13, 2020**	(1716799)
Item 6*	December 11, 2020**	(1716800)
Item 7*	January 15, 2021**	(1716801)
Item 8*	February 12, 2021**	(1729880)
Item 9*	March 12, 2021**	(1729881)
Item 10*	April 16, 2021**	(1729882)
Item 11*	May 13, 2021**	(1742232)
Item 12*	June 14, 2021**	(1742233)
Item 13*	July 14, 2021**	(1753138)
Item 14*	August 12, 2021**	(1758543)
Item 15*	August 27, 2021**	(1750113)
Item 16*	September 10, 2021**	(1767835)
Item 17*	October 19, 2021**	(1778398)
Item 18*	November 17, 2021**	(1785069)
Item 19*	December 16, 2021**	(1792102)
Item 20*	January 14, 2022**	(1799951)
Item 21	February 14, 2022**	(1807783)
Item 22*	March 14, 2022**	(1814826)
Item 23*	April 18, 2022**	(1821395)
Item 24*	May 17, 2022**	(1830292)
Item 25*	June 15, 2022**	(1836542)
Item 26*	July 14, 2022**	(1843727)
Item 27*	August 17, 2022**	(1849889)
Item 28	September 16, 2022**	(1857658)
Item 29*	October 12, 2022**	(1864012)
Item 30	November 21, 2022**	(1870921)
Item 31	December 14, 2022**	(1876778)
Item 32*	January 12, 2023**	(1883588)
Item 33	February 15, 2023**	(1891402)
Item 34*	March 17, 2023**	(1899975)
Item 35*	May 18, 2023**	(1906775)
Item 36*	June 16, 2023**	(1920536)
Item 37*	July 14, 2023**	(1927522)
Item 38*	August 18, 2023**	(1934463)
Item 39*	September 14, 2023**	(1940640)
Item 40*	October 16, 2023**	(1947442)
Item 41*	November 13, 2023**	(1953128)
Item 42*	December 15, 2023**	(1962913)
Item 43*	January 18, 2024**	(1969491)
Item 44*	February 15, 2024**	(1978569)
Item 45*	March 14, 2024**	(1985130)
Item 46	April 18, 2024**	(1991674)
Item 47*	May 17, 2024**	(1998108)

Item 48*	June 17, 2024**	(2005075)
Item 49*	July 16, 2024**	(2012642)
Item 50*	August 15, 2024**	(2018206)
Item 51*	September 17, 2024	(2025244)
Item 52*	October 15, 2024	(2031354)
Item 53*	November 15, 2024	(2037674)
Item 54*	December 16, 2024	(2044065)
Item 55	June 27, 2025	(2071051)

* 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
THE CENTER FOR PURSUIT
RN102917069

§
§
§
§
§

BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2025-1009-MWD-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 THE CENTER FOR PURSUIT (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 together stipulate that:

1. The Respondent owns and operates a wastewater treatment facility located at 4073 Farm-to-Market 3318 in Pattison, Waller 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. 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. 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 \$15,000 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$12,000 of the penalty and \$3,000 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that on June 12, 2025, the Respondent submitted application for Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0016826001 for the Facility.

II. ALLEGATIONS

During a record review the Facility conducted on May 29, 2025, an investigator documented that the Respondent failed to maintain authorization to discharge wastewater into or adjacent to any water in the state, in violation of 30 TEX. ADMIN. CODE § 305.65. Specifically, TPDES Permit No. WQ0013466001 expired on January 8, 2025, and the Respondent continued to operate the wastewater treatment facility without authorization.

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: THE CENTER FOR PURSUIT, Docket No. 2025-1009-MWD-E" to:

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

2. The Respondent shall, within 300 days after the effective date of the Order, submit written certification, that authorization to operate has been obtained or that operation has ceased until such time that appropriate authorization is obtained. The certification shall 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
Houston Regional Office
Texas Commission on Environmental Quality
5425 Polk Street, Suite H
Houston, Texas 77023-1452

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this

Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Krista Mello-Jurack

For the Executive Director

11/20/2025

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.

Annie Hunnel

Signature

9/22/25

Date

ANNIE HUNNEL

Name (Printed or typed)
Authorized Representative of
THE CENTER FOR PURSUIT

CHIEF OF STAFF

Title

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

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