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

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 29, 2025

Fabio Sandri, President
PILGRIM'S PRIDE CORPORATION
1770 Promontory Circle
Greeley, Colorado 80634

Via email

Re: Proposed Agreed Order
PILGRIM'S PRIDE CORPORATION; RN102184041; TPDES Permit No. WQ0003017000
Docket No. 2025-1523-IWD-E; Enforcement Case No. 67259
FOR SETTLEMENT PURPOSES ONLY

Dear Fabio Sandri:

The Executive Director of the Texas Commission on Environmental Quality ("Commission" or "TCEQ") is pursuing an enforcement action against PILGRIM'S PRIDE CORPORATION of the Texas Water Code, and Commission Rules. These violations were discovered during a record review conducted on October 23, 2024, and documented in a letter dated December 6, 2024, from the TCEQ Tyler Regional Office.

Please find enclosed a proposed agreed order which we have prepared in an attempt to expedite this enforcement action. The order assesses an administrative penalty of $60,200 We are proposing a one-time offer to defer $12,040 of the administrative penalty if you satisfactorily comply with all the ordering provisions within the time frames listed. Therefore, the administrative penalty to be paid is $48,160. The order also identifies the violations that we are addressing and identifies specific technical requirements necessary to resolve them.

If you have any questions regarding this matter, we are available to discuss them in a conference in Austin or over the telephone. If we reach agreement in a timely manner, the TCEQ will then proceed with the remaining procedural steps to settle this matter. These steps include publishing notice of the proposed order in the *Texas Register* and scheduling the matter for approval by the Commission. We believe that handling this matter expeditiously could save PILGRIM'S PRIDE CORPORATION and the TCEQ a significant amount of time, as well as the expense associated with litigation.

If you agree with the order as proposed, please have an authorized representative sign and return the original order **and** the penalty payment (check payable to "TCEQ" and referencing PILGRIM'S PRIDE CORPORATION, Docket No. 2025-1523-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

Should you elect to pay the payable penalty electronically, TCEQ invites you to use ePay, the TCEQ's secure online payment system at: https://www3.tceq.texas.gov/epay/index.cfm. Please ensure that you have the following details ready when making your payment using ePay:

- **Payable Penalty/Fee Amount:** $48,160
- **Penalty Type/Fee Category: WATER QUALITY ACT VIOLATIONS (ADMIN PENALTIES)**
    - This information will be needed on the "Select Fee" page on ePay.
- **Program Area ID:** ENF
- **Project Number/Case No.:** 67259
- **Email Us Your Receipt:** To ensure prompt recognition of your payment, please forward your email receipt from ePay to Amy Lane at amy.lane@tceq.texas.gov.

For detailed instructions on how to complete your payment using ePay, please use the Enforcement Division ePay Guide for Orders at: https://www.tceq.texas.gov/compliance/enforcement/penalty-payment.

Should you believe you are unable to pay the proposed administrative penalty, you may claim financial inability to pay part or all of the penalty amount. Please contact us immediately to obtain a list of financial disclosure documents that must be submitted within 15 days of the receipt of this letter. These documents, once properly completed and submitted, will be thoroughly reviewed to determine if we agree with the claim of financial inability. Please be aware that if financial inability is proven to the satisfaction of staff, discussions pertaining to the penalty amount adjustment will focus only on deferral and not on waiver of the penalty amount.

You may be able to perform or contribute to a Supplemental Environmental Project ("SEP"), which is a project that benefits the environment, to offset a portion of your penalty. **If you are interested in performing an SEP, you must agree to the penalty amount and submit an SEP proposal within 15 days of receipt of this proposed order.**

For additional information about the types of SEPs available and eligibility criteria, please go to the TCEQ's web site link at https://www.tceq.texas.gov/compliance/enforcement/sep or contact the Enforcement Coordinator listed below.

Please note that any agreements we reach are subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a).

If we cannot reach a settlement of this enforcement action or you do not wish to participate in this expedited process, we will proceed with enforcement under the Commission's Enforcement Rules, 30 TEX. ADMIN. CODE ch. 70. Specifically, if the signed order and penalty

are not mailed and postmarked within 30 days from the date of this letter, your case will be forwarded to the Litigation Division and this settlement offer, including the penalty deferral, will no longer be available. The enforcement process described in 30 TEX. ADMIN. CODE ch. 70 requires the staff to prepare and issue an Executive Director's Preliminary Report and Petition to the Commission. If you would like to obtain a copy of 30 TEX. ADMIN. CODE ch. 70, or any other TCEQ rules, the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI-032) are located on our agency website at https://www.tceq.texas.gov for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from the Central Office Publications Ordering Team at (512) 239-0028.

For any questions or comments about this matter or to arrange a meeting, please contact Amy Lane of my staff at (512) 239-2614 or at amy.lane@tceq.texas.gov.

Sincerely,

Laura Draper

Laura Draper, Manager
Enforcement Division
Texas Commission on Environmental Quality

LD/al

Enclosures: Proposed Agreed Order, Penalty Calculation Worksheet, Site Compliance History, Return Envelope, Effluent Violation Table

cc: Via email
Tyson Clark, Environmental Manager, PILGRIM'S PRIDE CORPORATION
Brian Paulsen, Head of Environmental Engineering, PILGRIM'S PRIDE CORPORATION

bcc: Manager, Water Section, Tyler Regional Office
Amy Lane, Coordinator, Enforcement Division, MC 219
Central Records, MC 213, Building E, 1st Floor
IWD_03017_CP_20251029_Compliance

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN	**§**	**BEFORE THE**
ENFORCEMENT ACTION	**§**	
CONCERNING	**§**	**TEXAS COMMISSION ON**
PILGRIM'S PRIDE CORPORATION	**§**	
RN102184041	**§**	**ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2025-1523-IWD-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 PILGRIM'S PRIDE CORPORATION (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 plant located at 664 Farm-to-Market Road 127 West in Mount Pleasant, Titus 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 $60,200 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid $48,160 of the penalty and $12,040 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.

II. ALLEGATIONS

During a record review for the Facility conducted on October 23, 2024, an investigator documented that 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. WQ0003017000, Effluent Limitations and Monitoring Requirements No. 1., as shown in the effluent violation table below.

PILGRIM'S PRIDE CORPORATION

TPDES Permit No. WQ0003017000

Case No. 67259

Docket No. 2025-1523-IWD-E

Effluent Violation Table

Monitoring Period	BOD (5-day) Daily Average Conc. Limit = 16 mg/L	BOD (5-day) Daily Max. Conc. Limit = 26 mg/L	BOD (5-day) Daily Average Loading Limit = 454 lbs/day	CBOD (5-day) Daily Average Conc. Limit = 5 mg/L	CBOD (5-day) Daily Max. Average Conc. Limit = 10 mg/L	CBOD (5-day) Total Daily Average Loading Limit = 146 lbs/day
August 2023	c	c	c	5.6	c	c
June 2024	c	c	c	5.3	11	c
July 2024	18.9	39	493.4	13.7	32	358.5

Monitoring Period	*Escherichia coli* Daily Average Conc. Limit = 126 CFU/100	*Escherichia coli* Daily Max. Conc. Limit = 394 CFU/100	Ammonia Nitrogen Daily Max. Conc. Limit = 2 mg/L	Ammonia Nitrogen Daily Max. Loading Limit = 58 lbs/day	TSS Daily Average Conc. Limit = 15 mg/L	TSS Daily Max. Conc. Limit = 30 mg/L	TSS Daily Average Loading Limit = 376 lbs/day
August 2023	c	649	c	c	c	c	c
December 2023	c	613	c	c	c	c	c
June 2024	c	c	c	c	31.3	56	532.3
July 2024	140	1,550	4.46	104.3	98.5	360	2,500.7

BOD = biochemical oxygen demand CBOD = carbonaceous biochemical oxygen demand TSS = total suspended solids Conc. = concentration Max. = maximum mg/L = milligrams per liter lbs/day = pounds per day CFU/100 = colony-forming unit per 100 milliliters c = compliant

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: PILGRIM'S PRIDE CORPORATION, Docket No. 2025-1523-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, within 130 days after the effective date of this Order, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0003017000 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, 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
Tyler Regional Office
Texas Commission on Environmental Quality
2916 Teague Drive
Tyler, Texas 75701-3734

3. All relief not expressly granted in this Order is denied.

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

_____ _____
For the Executive Director Date

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

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

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

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

_____ _____
Signature Date

_____ _____
Name (Printed or typed) Title
Authorized Representative of
PILGRIM'S PRIDE CORPORATION

☐ *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.

Penalty Calculation Worksheet (PCW)

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

DATES						
Assigned	16-Dec-2024					
PCW	23-Oct-2025	**Screening**	24-Jan-2025	**EPA Due**	5-Mar-2025	

RESPONDENT/FACILITY INFORMATION			
Respondent	PILGRIM'S PRIDE CORPORATION		
Reg. Ent. Ref. No.	RN102184041		
Facility/Site Region	5-Tyler	**Major/Minor Source**	Major

CASE INFORMATION			
Enf./Case ID No.	67259	**No. of Violations**	2
Docket No.	2025-1523-IWD-E	**Order Type**	1660
Media Program(s)	Water Quality	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	Amy Lane
		EC's Team	Enforcement Team 7

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

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) ***Subtotal 1*** **$35,000**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History **72.0%** Adjustment ***Subtotals 2, 3, & 7*** **$25,200**

Notes: Enhancement for nine months of self-reported effluent violations, one NOV with a dissimilar violation, and one agreed final enforcement order without a denial of liability.

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

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments ***Subtotal 5*** **$0**

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

Total EB Amounts $1,936
Estimated Cost of Compliance $15,000

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 ***Final Subtotal*** **$60,200**

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

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount **$60,200**

STATUTORY LIMIT ADJUSTMENT ***Final Assessed Penalty*** **$60,200**

DEFERRAL **20.0%** Reduction ***Adjustment*** **-$12,040**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **$48,160**

Screening Date 24-Jan-2025 **Docket No.** 2025-1523-IWD-E **PCW**

Respondent PILGRIM'S PRIDE CORPORATION

Policy Revision 5 (January 28, 2021)

Case ID No. 67259

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN102184041

Media Water Quality

Enf. Coordinator Amy Lane

Compliance History Worksheet

>> Compliance History *Site* Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	9	45%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgments or consent decrees meeting criteria*)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	0	0%

Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 72%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for nine months of self-reported effluent violations, one NOV with a dissimilar violation, and one agreed final enforcement order without a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 72%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** 72%

Screening Date	24-Jan-2025	**Docket No.** 2025-1523-IWD-E	**PCW**
Respondent	PILGRIM'S PRIDE CORPORATION		*Policy Revision 5 (January 28, 2021)*
Case ID No.	67259		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN102184041		
Media	Water Quality		
Enf. Coordinator	Amy Lane		

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. WQ0003017000, Effluent Limitations and Monitoring Requirements No. 1

Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual			x
Potential			

Percent 30.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: A simplified model was used to evaluate carbonaceous biochemical oxygen demand to determine whether the discharged amounts of pollutants exceeded protective levels. *Escherichia coli* and total suspended solids were also considered. 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 $17,500

$7,500

Violation Events

Number of Violation Events: 3 — 91 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty $22,500

Three quarterly events are recommended for the quarter containing the months of August and December 2023, and June 2024.

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 $22,500

Economic Benefit (EB) for this violation

Estimated EB Amount $1,936

Statutory Limit Test

Violation Final Penalty Total $38,700

This violation Final Assessed Penalty (adjusted for limits) $38,700

Economic Benefit Worksheet

Respondent PILGRIM'S PRIDE CORPORATION
Case ID No. 67259
Reg. Ent. Reference No. RN102184041
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
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)	$15,000	31-Aug-2023	30-Mar-2026	2.58	$1,936	n/a	$1,936
Notes for DELAYED costs	Estimated Other Costs 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	$15,000				TOTAL	$1,936	

Screening Date	24-Jan-2025	**Docket No.** 2025-1523-IWD-E	**PCW**
Respondent	PILGRIM'S PRIDE CORPORATION		*Policy Revision 5 (January 28, 2021)*
Case ID No.	67259		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN102184041		
Media	Water Quality		
Enf. Coordinator	Amy Lane		

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0003017000, Effluent Limitations and Monitoring Requirements No. 1

Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	**Harm** Major	Moderate	Minor
Actual		x	
Potential			

Percent 50.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

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

Adjustment $12,500

$12,500

Violation Events

Number of Violation Events: 1 — 31 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty $12,500

One monthly event is recommended for the month of July 2024.

Good Faith Efforts to Comply

0.0% Reduction $0

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

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

Violation Subtotal $12,500

Economic Benefit (EB) for this violation

Estimated EB Amount $0

Statutory Limit Test

Violation Final Penalty Total $21,500

This violation Final Assessed Penalty (adjusted for limits) $21,500

Economic Benefit Worksheet

Respondent PILGRIM'S PRIDE CORPORATION
Case ID No. 67259
Reg. Ent. Reference No. RN102184041
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
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)				0.00	$0	n/a	$0
Notes for DELAYED costs	See Economic Benefit Worksheet for Violation No. 1.						
Avoided Costs	ANNUALIZE avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance $0

TOTAL $0

The TCEQ is committed to accessibility.
To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.

Compliance History Report

Compliance History Report for CN601276660, RN102184041, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator: CN601276660, PILGRIM'S PRIDE CORPORATION **Classification:** SATISFACTORY **Rating:** 0.63

Regulated Entity: RN102184041, PILGRIMS PRIDE NORTHEAST TEXAS COMPLEX WWTP **Classification:** SATISFACTORY **Rating:** 4.05

Complexity Points: 14 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 664 Farm-to-Market Road 127 West in the City of Mount Pleasant in Titus County, Texas

TCEQ Region: REGION 05 - TYLER

ID Number(s):

WASTEWATER PERMIT WQ0003017000

WASTEWATER EPA ID TX0062936

POLLUTION PREVENTION PLANNING ID NUMBER P09709

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 31649

TAX RELIEF ID NUMBER 20378

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

Date Compliance History Report Prepared: October 03, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: October 03, 2020 to October 03, 2025

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

Name: Amy Lane **Phone:** (512) 239-2614

Site and Owner/Operator History:

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

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

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

1 Effective Date: 11/28/2022 ADMINORDER 2019-1440-IWD-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: Effluent Limits PERMIT

Description: Failure to comply with permit effluent limits as documented by a TCEQ record review of self-reported data.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1 October 13, 2020 (1694014)
Item 2 November 12, 2020 (1714710)

Item 3 December 18, 2020 (1714711)

Item 4	January 13, 2021	(1714712)
Item 5	February 19, 2021	(1727775)
Item 6	March 17, 2021	(1727776)
Item 7	April 15, 2021	(1727777)
Item 8	May 11, 2021	(1684748)
Item 9	May 17, 2021	(1741188)
Item 10	June 14, 2021	(1741189)
Item 11	July 08, 2021	(1752452)
Item 12	August 12, 2021	(1757881)
Item 13	September 14, 2021	(1767106)
Item 14	October 12, 2021	(1777580)
Item 15	November 16, 2021	(1784379)
Item 16	December 10, 2021	(1791409)
Item 17	January 10, 2022	(1799191)
Item 18	February 07, 2022	(1807069)
Item 19	March 14, 2022	(1814133)
Item 20	April 11, 2022	(1820707)
Item 21	May 10, 2022	(1829542)
Item 22	June 16, 2022	(1835836)
Item 23	July 07, 2022	(1843037)
Item 24	August 08, 2022	(1849166)
Item 25	October 13, 2022	(1863324)
Item 26	November 03, 2022	(1870236)
Item 27	December 07, 2022	(1876084)
Item 28	January 10, 2023	(1882905)
Item 29	March 15, 2023	(1899283)
Item 30	April 11, 2023	(1906088)
Item 31	May 02, 2023	(1887964)
Item 32	May 05, 2023	(1913243)
Item 33	June 13, 2023	(1919853)
Item 34	October 16, 2023	(1946762)
Item 35	November 16, 2023	(1952452)
Item 36	December 11, 2023	(1962223)
Item 37	February 15, 2024	(1977876)
Item 38	March 18, 2024	(1984452)
Item 39	April 12, 2024	(1990974)
Item 40	May 16, 2024	(1997429)
Item 41	June 17, 2024	(2004382)
Item 42	September 16, 2024	(1996465)
Item 43	September 20, 2024	(2009761)
Item 44	October 30, 2024	(2014962)
Item 45	January 31, 2025	(2036090)
Item 47	March 03, 2025	(2047618)
Item 48	March 24, 2025	(2054911)
Item 49	April 22, 2025	(2055714)
Item 51	May 27, 2025	(2070190)
Item 52	June 02, 2025	(2070149)
Item 53	July 22, 2025	(2082670)
Item 54	September 10, 2025	(2083269)

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: 10/31/2024 (2037000)

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: 11/30/2024 (2043378)

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: 12/31/2024 (2049937)
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: 01/31/2025 (2057502)
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: 02/28/2025 (2066065)
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: 03/31/2025 (2072878)
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: 04/30/2025 (2079267)
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: 05/31/2025 (2086365)
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: 06/30/2025 (2093471)
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: 08/29/2025 (2085281)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125
TX0062936 PERMIT
WQ0003017000 PERMIT
Description: Failure to properly operate and maintain facility.

F. Environmental audits:

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

PILGRIM'S PRIDE CORPORATION

TPDES Permit No. WQ0003017000

Case No. 67259

Docket No. 2025-1523-IWD-E

Effluent Violation Table

Monitoring Period	BOD (5-day) Daily Average Conc. Limit = 16 mg/L	BOD (5-day) Daily Max. Conc. Limit = 26 mg/L	BOD (5-day) Daily Average Loading Limit = 454 lbs/day	CBOD (5-day) Daily Average Conc. Limit = 5 mg/L	CBOD (5-day) Daily Max. Average Conc. Limit = 10 mg/L	CBOD (5-day) Total Daily Average Loading Limit = 146 lbs/day
August 2023	c	c	c	5.6	c	c
June 2024	c	c	c	5.3	11	c
July 2024	18.9	39	493.4	13.7	32	358.5

Monitoring Period	*Escherichia coli* Daily Average Conc. Limit = 126 CFU/100	*Escherichia coli* Daily Max. Conc. Limit = 394 CFU/100	Ammonia Nitrogen Daily Max. Conc. Limit = 2 mg/L	Ammonia Nitrogen Daily Max. Loading Limit = 58 lbs/day	TSS Daily Average Conc. Limit = 15 mg/L	TSS Daily Max. Conc. Limit = 30 mg/L	TSS Daily Average Loading Limit = 376 lbs/day
August 2023	c	649	c	c	c	c	c
December 2023	c	613	c	c	c	c	c
June 2024	c	c	c	c	31.3	56	532.3
July 2024	140	1,550	4.46	104.3	98.5	360	2,500.7

BOD = biochemical oxygen demand CBOD = carbonaceous biochemical oxygen demand TSS = total suspended solids Conc. = concentration Max. = maximum mg/L = milligrams per liter lbs/day = pounds per day CFU/100 = colony-forming unit per 100 milliliters c = compliant