

1.2. This case is not subject to the restrictions of expedited proceedings under Rule 169 because (1) Harris County seeks non-monetary injunctive relief and (2) Harris County's claims for civil penalties are potentially in excess of \$200,000 but the maximum potential civil penalty is not more than \$1,000,000. Tex. R. Civ. P. 47(c)(4).

2. AUTHORITY TO SUE

2.1. Harris County brings this cause of action by and through its County Attorney as authorized through a formal order of its governing body, the Commissioners Court of Harris County, Texas, issued on September 26, 2017.

2.2. Harris County brings this cause of action on its own behalf and on behalf of the residents of Harris County, Texas, for injunctive relief and civil penalties under the authority granted in §§ 7.102 and 7.351(a) of the Texas Water Code.

3. PLAINTIFF

3.1. Plaintiff Harris County, Texas (Harris County) is a political subdivision of the State of Texas.

3.2. The State of Texas (the State), acting by and through the Texas Commission on Environmental Quality (TCEQ or Commission) is a necessary and indispensable party to this lawsuit pursuant to § 7.353 of the Water Code.¹

4. DEFENDANT

4.1. Defendant Arkema, Inc. (Arkema) is a Pennsylvania corporation which owns and operates a chemical manufacturing plant at 18000 Crosby Eastgate Road, Crosby, Texas 77532 (Facility) in Harris County, Texas. It may be served with citation by serving its Registered Agent, Corporation Service Company, at 211 East 7th Street, Suite 620, Austin, Texas 77701, or wherever it may be found.

¹ See also Tex. Water Code § 7.001(1) (“‘Commission’ means the Texas Natural Resource Conservation Commission.”); Act of April 20, 2001, 77th Leg., R.S., ch. 965, § 18.01(1), 2001 Tex. Gen. Laws 1933, 1985 (changing name from Texas Natural Resource Conservation Commission to the Texas Commission on Environmental Quality).

5. JURISDICTION AND VENUE

5.1. This Court has jurisdiction over the case and venue is proper in Harris County because this is an action to enforce Chapter 382 of the Texas Health and Safety Code and the Commission rules promulgated thereunder and all of the events or omissions giving rise to the claim occurred in Harris County. *See* Tex. Civ. Prac. & Rem. Code § 15.002(a)(1) and Tex. Water Code § 7.105(c).

6. APPLICABLE LAW

THE TEXAS CLEAN AIR ACT

A. The Texas Health and Safety Code

Purpose

6.1. The Texas Clean Air Act (the Act) is found in Chapter 382 of the Texas Health and Safety Code. The purpose of the Act is to safeguard the State's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility. Tex. Health & Safety Code Ann. § 382.002 (West 2010).

Unauthorized Emissions Prohibited

6.2. Except as authorized by a Commission rule or order, the Act prohibits any person from causing, suffering, allowing, or permitting the emission of any air contaminant or the performance of any activity that causes or contributes to air pollution. *Id.* at § 382.085(a). In addition, a person may not cause, suffer, allow or permit the emission of any air contaminant or the performance of any activity in violation of Chapter 382 or of any Commission rule or order. *Id.* at § 382.085(b).

TCEQ Authorized to Adopt Rules

6.3. The Act authorizes the TCEQ to adopt rules to carry out the intent and purposes of the Act. *Id.* at § 382.017. The TCEQ has promulgated rules (Commission rules) based on that authority, found in Chapters 101-122 of Title 30 of the Texas Administrative Code.

Definitions

6.4. “Air pollution” means the presence in the atmosphere of one or more air contaminants or combination of air contaminants in such concentration and of such duration that: (A) are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property; or (B) interfere with the normal use or enjoyment of animal life, vegetation, or property. Tex. Health & Safety Code Ann. § 382.003(3).

6.5. “Air contaminant” means “particulate matter, radioactive material, dust, fumes, gas, mist, smoke, vapor, or odor, including any combination of those items, produced by processes other than normal.” Tex. Health & Safety Code Ann. § 382.003(2).

B. The Texas Administrative Code

Regulatory Nuisance or Creating Air Pollution

6.6. Section 101.4 of Title 30 of the Texas Administrative Code prohibits any person from discharging from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property. 30 Tex. Admin. Code § 101.4.

TEXAS WATER CODE

A. Definitions

6.7. “To discharge” means “to deposit, conduct, drain, emit, throw, run, allow to seep, or otherwise release or dispose of, or to allow, permit, or suffer any of these acts or omissions.” Tex. Water Code § 26.001(20).

6.8. “Industrial Waste” means “waterborne liquid, gaseous, or solid substances, that result from any process of industry, manufacturing, trade, or business.” *Id.* at § 26.001(11).

B. Discharges into Waters in the State Prohibited

6.9. Texas Water Code § 26.121 states that “except as authorized by the commission, no person may discharge sewage...or industrial waste into or adjacent to any water in the state.”

ENFORCEMENT

A. Definition

6.10. A “person” includes “corporation, organization, government or governmental subdivision or agency, business trust, estate, trust, partnership, association, and any other legal entity.” Tex. Gov’t Code § 311.005(2).

B. Civil Penalties, Injunctive Relief, and Costs

6.11. “A person may not cause, suffer, allow, or permit a violation of a statute within the commission’s jurisdiction or a rule adopted or an order or permit issued under such statute.” Tex. Water Code § 7.101.

6.12. A person who violates the Texas Water Code, Texas Health and Safety Code, or a Commission permit, rule, or order, is liable for a civil penalty of not less than \$50 nor more than \$25,000 for each day of each violation. *Id.* at § 7.102. Each day of a continuing violation is a separate violation. *Id.*

6.13. Harris County is authorized to file suit for injunctive relief and civil penalties for violations of Chapters 7 and 26 of the Texas Water Code and Chapter 382 of the Texas Health and Safety Code, and Commission rules and orders promulgated under these statutes. *Id.* at §§ 7.105, 7.351.

6.14. Harris County is not required to pay a filing fee or other security for costs and is not required to pay a bond prior to the Court granting an injunction. Tex. Civ. Prac. & Rem. Code § 6.001.

6.15. Harris County is also entitled to recover its attorney's fees, court costs and investigative costs in relation to this proceeding. Tex. Water Code § 7.108.

HARRIS COUNTY FLOODPLAIN REGULATIONS

A. Purpose

6.16. Harris County adopted the Regulations of Harris County, Texas for Floodplain Management (Floodplain Regulations) to “provide land use controls to qualify the unincorporated areas of Harris County for flood insurance” under the National Flood Insurance Act of 1968 and to protect human life and health.² Floodplain Regulations § 1.03.

B. Definitions

6.17. “Base flood” or “100-year flood” means a flood having a one percent chance of being equaled or exceeded in any one year.

6.18. “Base flood elevation” means the elevation or level above mean sea level that flood waters shall reach during the base flood.” *Id.* at § 2.30.

6.19. “Development” means “any man-made change to improved or unimproved real estate, including but not limited to buildings or other structures, mining, dredging, filling,

² The Floodplain Regulations were adopted pursuant to the Loc. Gov't Code § 240.901; Tex. Transp. Code §§ 251.001-251.059 and 254.001-254.019; and the Flood Control and Insurance Act, Subchapter I of Chapter 16 of the Tex. Water Code.

grading, paving, excavation or drilling operations or storage of equipment or materials.” *Id.* at § 2.12.

6.20. “Development Permit” or “Permit” means “a permit required by these [Floodplain] Regulations.” There are two classes of Permits: (1) Class I Permits are required for any development located “on a property where the elevation of the ground is above the base flood elevation.”; (2) Class II Permits are issued for any development that is “located on a property where the ground elevation is below the base flood elevation or subject to flooding.” *Id.* at § 2.35.

C. Unpermitted Development is Prohibited

6.21. “All development within the unincorporated areas of Harris County without first securing a permit is prohibited.” *Id.* at § 4.01.

D. Enforcement

6.22. Harris County may file suit seeking an injunction to “restrain the person from continuing the violation or threat of violation, including an order directing the person to remove illegal improvements and restore preexisting conditions.” Tex. Water Code § 16.323(a)(1); *see generally*, Floodplain Regulations § 7.01.

HAZARDOUS MATERIALS RESPONSE COST RECOVERY

6.23. Harris County is permitted to “provide limited control and containment measures that are necessary to protect human health and the environment” in instances where hazardous materials are leaked, spilled, released or abandoned on any property. Tex. Loc. Gov’t Code §§ 353.002 & 353.003.

6.24. In instances where the County responds a leak, spill, release or abandonment of hazardous materials, or provides hazardous materials service, the County may charge a

reasonable fee to offset its costs. Tex. Loc. Gov't Code § 353.004. Those costs are chargeable to a concerned party, Tex. Loc. Gov't Code § 353.004(a), and a concerned party is “a person involved in the possession, ownership, or transportation of a hazardous material that is released or abandoned; or [one] who has legal liability for the causation of an incident resulting in the release or abandonment of a hazardous material.” Tex. Loc. Gov't Code § 353.004(1).

7. VIOLATIONS

A. Background and Prior Enforcement by the TCEQ

7.1. Arkema owns and operates a plant that manufactures liquid organic peroxides at 18000 Crosby Eastgate Road, Crosby, Texas 77532. Among the products that Arkema manufactures at the Facility is a category of organic peroxides that have a self-accelerating decomposition temperature (SADT), which is the lowest temperature at which the product will begin a chemical decomposition process that leads to rapid burning. Products with a SADT must be refrigerated to temperatures lower than their SADT.

7.2. Arkema has been issued one Administrative Order from the TCEQ relating to Air Quality violations from its Crosby Facility in Harris County since May 2013.³ For that violation, the TCEQ assessed a \$3,413 penalty against Arkema.⁴

B. August 29, 2017 Violations

7.3. On or about August 25, 2017, Hurricane Harvey made landfall in Texas as a category 4 hurricane. For the next several days, the storm dropped over 50 inches of rain on parts of the Houston area, in line with weather forecasts from the previous week predicting massive rainfall. The region saw widespread flooding, and among the properties that flooded

³ List of Admin. Orders Issued Since Sept. 1, 1998, Tex. Comm'n on Env't'l Quality, 102, Sept. 14, 2016, <https://www.tceq.texas.gov/assets/public/compliance/enforcement/penenfacs/AdministrativeOrdersIssued.pdf>.

Of that \$3,413, \$682 was deferred.

was the Arkema Facility. Rainwater accumulated in two wastewater tanks at the Facility until the tanks overflowed into their containment dikes, which subsequently also exceeded their capacity. The wastewater contents thus mingled with floodwaters on the rest of the property.

7.4. The tank overflows resulted in unpermitted air releases, recorded in a Final State of Texas Environmental Electronic Reporting System (STEERS) report submitted by Arkema. The following table summarizes Arkema's reported calculations of the emissions that resulted from the August 29, 2017 emissions event, which lasted approximately six hours. These reported quantities are subject to revision, but because the emissions were from a source not authorized by a permit, no quantity of these emissions was authorized.

Pollutant	Emission Limit (lbs/hr)	Estimated Quantity Emitted (lbs)
Ethylbenzene	0	558.77
Mineral Spirit	0	11175.39
Naphtha	0	558.77
Naphthalene	0	558.77
Peroxide, organic	0	1396.92
Trimethylbenzene, 1,2,4-	0	3073.23
Unspeciated VOCs	0	3492.31
Tert-butyl alcohol	0	2793.85

C. August 31, 2017 Violations

7.5. Also as a result of the flooding, the Facility's primary and backup power systems went offline on August 27th. Arkema personnel moved liquid organic peroxides into eight refrigerated trailers, which also flooded and ceased cooling. Without refrigeration, the temperature in the trailers began to rise toward the organic peroxides' SADT.

7.6. On August 29, 2017, shortly after midnight, the Crosby Volunteer Fire Department (CVFD) received a phone call from the Arkema Corporate Office in Pennsylvania

stating that the Facility had flooded and requested that its employees be evacuated. The CVFD evacuated the skeleton crew of Arkema employees in two trips during the morning of August 29th.

7.7. On August 29th, based on modeling by the Environmental Protection Agency (EPA), the Harris County Fire Marshal's Office established an evacuation zone within a 1.5 mile radius of the Facility in preparation for the organic peroxides reaching their SADT and beginning to burn. All residents in the evacuation zone were ordered to leave their homes.

7.8. On August 30, 2017 at approximately 11:52 p.m., personnel from the Harris County Sheriff's Office who were stationed on U.S. 90 near the Facility to assist with the emergency response reported that they saw white smoke coming from the Facility.

7.9. On August 31, 2017, at approximately 1:30 a.m., CVFD personnel observed black smoke coming from the Facility. At approximately 1:56 a.m., one of the refrigerated trailers ignited. It burned for approximately two hours.

7.10. As the trailer burned, deputies from the Harris County Sheriff's Department who were on the scene to respond to the incident were exposed to the smoke as they drove to a meeting point. The deputies reported nausea, vomiting, and difficulty breathing and transported themselves to an emergency room for treatment.

7.11. Arkema submitted a Final STEERS Report to the TCEQ on September 13, 2017. The following table summarizes Arkema's reported calculations of the emissions that resulted from the August 31, 2017 emissions event, which lasted two hours. These reported quantities are subject to revision, but because the emissions were from a source not authorized by a permit, no quantity of these emissions was authorized.

Pollutant	Emission Limit (lbs/hr)	Quantity Emitted (lbs)
2-Ethylhexanol	0	527.41
Acetone	0	284.84
Acetophenone	0	1376.21
Carbon Monoxide	0	1589.46
Ethane	0	23.0
Nitrogen Dioxide	0	98.76
Nonane	0	1573.6
Nonene	0	518.76
Particulate matter	0	3043.53
Sulfur Dioxide	0	1.78
Unspeciated VOCs	0	3270.18

D. September 1, 2017

7.12. On September 1, 2017 at approximately 5 p.m., the liquid organic peroxides in two additional refrigerated trailers began to burn. The fires burned for approximately two hours.

7.13. Arkema submitted a Final STEERS Report that summarized its reported calculations of the emissions that resulted from the September 1st emissions event. These reported quantities are subject to revision, but because the emissions were from a source not authorized by a permit, no quantity of these emissions was authorized.

Pollutant	Emission Limit (lbs/hr)	Estimated Quantity Emitted (lbs)
2-Ethylhexanol	0	301.38
2-Ethylhexaldehyde	0	98.13
Acetone	0	752.32
Acetophenone	0	654.81
Carbon Monoxide	0	2059.54
Ethane	0	23.0
Nitrogen Dioxide	0	110.65
Nonane	0	1770.34
Nonene	0	582.02

Particulate matter	0	4222.73
Sulfur Dioxide	0	3.55
Unspeciated VOCs	0	2953.98

E. September 2, 2017

7.14. On September 2nd, the CVFD received a telephone complaint about an odor at a residence on the 21000 block of Ramsey Road, between 2.5 and three miles northwest of the Arkema Facility. At approximately 11:10 p.m., a Harris County Pollution Control Services Department (HCPCSD) investigator responded to the complaint accompanied by a Crosby VFD firefighter. The investigator used a MultiRAE portable air monitoring device to take readings of total volatile organic compounds (VOC) in the air. As they traveled to the residence by car, the investigator noticed a constant, faint, sweet odor resembling that of laundry detergent. They also saw falling ash and faint smoke near the intersection of Ramsey Road and Peters Road. The odor became stronger as they neared the complainant's residence, and the readings on the MultiRAE became higher, reaching levels in the 2.0 ppm to 3.0 ppm range. The investigator collected a sample in a SUMMA air sampling canister on the 21000 block of Ramsey Road. At the time and location he collected the sample, the MultiRAE detected a 3.0 ppm VOC concentration. The firefighter who was with the HCPCSD investigator reported that the odor was causing him to experience increased salivation. The HCPCSD investigator did not experience increased salivation, but found the odor in its concentration at that location to be highly unpleasant.

7.15. Based on the concentration and duration of the odor, the investigator determined it to be a nuisance. The investigator and firefighter could identify no source for the odor, smoke, and ash other than the fire at the Arkema Facility, from which they could see an orange glow in the sky.

7.16. After taking the air sample, the investigators could not proceed any further on Ramsey Road because it was flooded. They turned around and drove south on Ramsey Road and as they drove, the odor gradually decreased in intensity and the MultiRAE VOC levels decreased.

7.17. During the week of September 25th, the HCPCSD investigator spoke with four residents living within the 20500 block through the 21300 block of Ramsey Road. All had left their homes overnight on the night of September 2nd because of the odor present in and around their homes.

F. September 3, 2017

7.18. On September 3, 2017, personnel from the unified command consisting of Arkema employees and personnel from agencies including the TCEQ, EPA, and HCPCSD agreed to a controlled ignition of the material in six remaining trailers containing liquid organic peroxides. The controlled ignition was carried out at approximately 3:40 p.m. and lasted approximately two hours.

7.19. Arkema submitted a Final STEERS Report for the September 3rd emissions event on September 15, 2017. The following table summarizes Arkema's reported calculations of the emissions that resulted from the September 3rd emissions event. These reported quantities are subject to revision, but because the emissions were from a source not authorized by a permit, no quantity of these emissions was authorized.

Pollutant	Emission Limit (lbs/hr)	Estimated Quantity Emitted (lbs)
2-Ethylhexanol	0	1458.89
2-Ethylhexaldehyde	0	475.0
Acetone	0	1117.59
Acetophenone	0	641.86
Carbon Monoxide	0	6333.98

Ethane	0	14.7
Isobutane	0	242.0
Isobutene	0	77.87
Nitrogen Dioxide	0	344.75
Nonane	0	1830.98
Nonene	0	601.89
Particulate matter	0	12913.74
Unspeciated VOCs	0	7533.18
n-propanol	0	64.32

G. Hazard Response

7.20. Between August 30th and September 4, 2017, personnel from the Harris County Fire Marshal's Office (HCFMO) responded to the incident at the Arkema Facility, providing Hazardous Materials response, planning, and public information services throughout the incident. Among other duties, HCFMO personnel established hazard zones based on knowledge of the materials in the facility and EPA modeling. In total, HCFMO incurred at least \$43,944.75 in expenses during its hazardous materials response at the Facility, including employee hours and mileage reimbursement. An invoice is attached as **Exhibit A**.

H. Harris County Floodplain Regulations

7.21. A portion of the Arkema Facility lies beneath base flood elevation, including the majority of the land on which Arkema's equipment and buildings sit.

7.22. On information and belief, there are multiple structures in the Arkema Facility that require permits under the Floodplain Regulations.

7.23. As of the filing of this Petition, Harris County Engineering Department records show Arkema does not have a permit for one or more of the structures on its property. The Defendant is liable for a penalty within the statutory range for each day of violation.

8. DEFENDANT'S VIOLATIONS OF THE TEXAS CLEAN AIR ACT

The following violations occurred in Harris County, Texas:

A. Statutory Nuisance

8.1. Defendant violated Texas Water Code § 7.101, Texas Health and Safety Code § 382.085, and Section 101.4 of Title 30 of the Texas Administrative Code on August 31, 2017 by discharging from its Facility at least one air contaminants in such concentration and or such duration as to be injurious to human health, welfare, or property, or as to interfere with the normal use and enjoyment of property.

8.2. Specifically, Defendant's emissions required the evacuation of residents within a 1.5 mile radius of the Facility, depriving the residents of the normal use of their property for the duration of the evacuation. The emissions also caused Harris County Sheriff's deputies to have nausea and difficulty breathing. This constitutes one day of violation. Defendant is liable for a penalty within the statutory range for each day of violation.

B. Emission Event Violations

8.3. Defendant committed violations of Texas Health and Safety Code § 382.085 by causing the emission of eight air contaminants on August 29, 2017 and 11 air contaminants on August 31, 2017 without authorization. This constitutes at least 19 days of violations. The Defendant is liable for a penalty within the statutory range for each day of violations.

8.4. Defendant's violations of the Texas Clean Air Act and the rules promulgated thereunder, enumerated in paragraphs 8.1. – 8.3. of this section, constitute a total of 20 days of violations.

8.5. Defendant's violations of the Texas Clean Air Act that occurred from September 1 – 3, 2017 are not enumerated here because Harris County is not currently seeking civil penalties for violations on those dates.

9. DEFENDANT'S VIOLATION OF THE TEXAS WATER CODE

9.1. The Defendant violated sections 26.121 and 7.101 of the Texas Water Code by discharging industrial wastewater from its wastewater tank on August 29, 2017. This constitutes one day of violation.

10. CIVIL PENALTIES

10.1. As detailed in Sections 8 and 9 of this Petition, the Defendant committed 21 violations falling under the penalty provisions of Tex. Water Code § 7.102.

10.2. Harris County requests that the Defendant be assessed a civil penalty between \$50 and \$25,000 for each day of each violation under the Texas Clean Air Act and the Texas Water Code, treating each day of a continuing violation as a separate violation. Tex. Water Code § 7.102.

10.3. Under the Texas Water Code a person who violates the Floodplain Regulations is subject to a civil penalty of “not more than \$100 for each act of violation and for each day of violation.” Tex. Water Code §16.322.

10.4. Harris County is not seeking civil penalties at this time for violations on September 1 – 3, 2017.

11. INJUNCTIVE RELIEF

11.1. As shown above, Defendant Arkema violated provisions of the Texas Water Code, the Texas Clean Air Act, and Commission rules on August 29 and 31, and September 1, 2, and 3, 2017.

11.2. As used in this Injunction, the following words and terms set forth below have the following meanings:

- a) “Defendant” or “Arkema” shall mean Arkema, Inc.
- b) “Facility” shall mean Arkema’s Facility located at 18000 Crosby Eastgate Road, Crosby, Harris County, Texas.
- c) “Harris County” shall mean Harris County, Texas, a political subdivision of the State of Texas.
- d) “Immediately” shall mean by 5:00 p.m. Central Standard Time on the next Day after the Effective Date.
- e) “State” shall mean the State of Texas, acting by and through the Texas Commission on Environmental Quality, a necessary and indispensable party to this suit.
- f) “Plaintiffs” shall mean Harris County and the State, collectively.

A. Permanent Injunction

11.3. Harris County seeks a permanent injunction ordering the Defendant to comply with the Texas Water Code, the Texas Clean Air Act, and Commission Rules at the Facility. Specifically, Harris County requests an injunction against Defendant, ordering Defendant, its agents, officers, directors, servants, and employees, and all other persons who receive actual notice of this Injunction to be enjoined as follows:

- a) Harris County requests that this Court order Defendant to engage an independent third party to conduct an environmental audit of Defendant’s Facility and disaster preparedness plans and report to the Court any

deficiencies found, as well as what actions must be taken in order to bring the Facility into compliance;

- b) Upon completion of the environmental audit, Harris County requests that this Court order Defendant to implement the independent auditor's recommendations;
- c) Harris County additionally requests that this Court order Defendant to obtain all permits required under the Floodplain Regulations; and
- d) Harris County requests any additional or alternative injunctive relief deemed appropriate by this Court.

12. HAZARDOUS MATERIALS RESPONSE COSTS

12.1. Harris County requests that, upon final hearing, this Court award Harris County a reasonable fee to offset the costs it incurred in responding to the incident at the Facility, as authorized by Tex. Loc. Gov't Code § 353.001 *et seq.* The HCFMO incurred costs of at least \$43,944.75 between August 30 and September 4, 2017. Harris County expects that its total calculated response costs will exceed that figure.

13. ATTORNEY'S FEES, COURT COSTS, AND INVESTIGATIVE COSTS

13.1. Harris County requests that, upon final hearing, this Court award Harris County reasonable attorney's fees and costs, to be recovered from Defendant. Tex. Water Code § 7.108; Tex. Gov't Code § 402.006(c); and Tex. Loc. Gov't Code § 113.902.

14. PRAYER

14.1. Plaintiff, Harris County, Texas asks this Court for a final judgment and a permanent injunction against Defendant as follows:

- a) That the State of Texas be made a necessary and indispensable party to the suit as required by law;
- b) That, upon trial, this Court grant a permanent injunction against Defendant, in favor of Plaintiff, for the injunctive relief as laid out above;
- c) That, upon trial, this Court grant civil penalties against Defendant, within the range allowed by law, as requested above;
- d) That, upon trial, this Court grant Harris County a reasonable fee for its hazardous materials response expenses;
- e) That, upon trial, this Court grant Harris County its reasonable attorney's fees and that all costs be assessed against Defendant, plus interest at the legal rate from the date of judgment until fully paid; and
- f) That this Court grant such other and further relief to which Plaintiff may be justly entitled.

Respectfully submitted,

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