



STATE OF MISSISSIPPI  
TATE REEVES  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHRIS WELLS, EXECUTIVE DIRECTOR

January 5, 2026

CERTIFIED MAIL/RETURN RECEIPT REQUESTED #7019 1120 0000 4785 6933

Mr. Alvin Cullom  
Southeastern Railway Services  
PO Box 72  
Magnolia, Mississippi 39652

**Re: Southeastern Railway Services  
Agreed Order No. 7646 26**

Dear Mr. Cullom:

Enclosed you will find a copy of Agreed Order No. 7646 26, which has been executed by the Executive Director of the Mississippi Department of Environmental Quality, Chris Wells, on behalf of the Mississippi Commission on Environmental Quality.

The enclosed Order assesses a civil penalty. The penalty payment, when due, should be made by check payable to the Mississippi Department of Environmental Quality and returned in the enclosed, self-addressed envelope to the MDEQ Accounts Receivable at P.O. Box 2339, Jackson, MS 39225.

If you have any questions regarding your obligations under the enclosed order, please contact Geoffrey Martin at (601) 961-5024.

Sincerely,

A handwritten signature in blue ink that reads "Michelle Clark".

Michelle Clark, P.E., BCEE, Chief  
Environmental Compliance and Enforcement Division

Enclosure  
cc: Geoffrey Martin

Agency Interest No. 14956  
ENF20250001

BEFORE THE MISSISSIPPI COMMISSION  
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON  
ENVIRONMENTAL QUALITY

COMPLAINANT

VS.

ORDER NO. 7646 26

SOUTHEASTERN RAILWAY SERVICES  
300 EAST RAILWAY AVENUE SOUTH  
MAGNOLIA, MISSISSIPPI 39652

RESPONDENT

AGREED ORDER

COME NOW the Mississippi Commission on Environmental Quality (Commission), acting through the staff and Executive Director of the Mississippi Department of Environmental Quality (MDEQ), Complainant, and Southeastern Railway Services, Respondent, in the above captioned cause and agree as follows:

1.

By letter dated April 26, 2024, Respondent was contacted by Complainant and notified of the following violations of Synthetic Minor Operating Permit No. 2280-00031 at its Magnolia facility located at 300 East Railway Avenue South, Magnolia, MS in Pike County:

- A. Respondent had an unpermitted fuel storage tank onsite in violation of Condition 1.A.11, which states, "This permit does not authorize a modification as defined in Regulation 11 Miss. Admin, Code "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject under the Federal Act into

the atmosphere not previously emitted...”.”

- B. Respondent failed to conduct and record monthly maintenance records in violation of Condition 5.4, which states, “For Emission Point AA-002, the permittee shall demonstrate compliance with Condition 3.6 by performing monthly maintenance inspections on each arrestor filter to determine the operating condition of the control device. A record documenting the date of the inspections, the name of the person who performs the inspections, and any maintenance conducted shall be kept at the facility. The record shall include information regarding shut down periods, corrective actions taken, and time the unit(s) were operated without controls. The records shall be made available to DEQ upon request.”
- C. Respondent failed to monitor and record hours of operation in violation of Condition 5.5, which states, “For Emission Point AW-001, the permittee shall monitor and record the hours of operation. A log shall be kept for each welding session and shall include the following information: time welding began, time welding ceased, and hours of welding per session.”
- D. Respondent failed to submit Synthetic Minor annual reports for calendar years 2022 and 2023 in violations of Condition 6.2, which states, “Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year.”

On October 7, 2024, Respondent submitted the annual monitoring reports for calendar years 2022 and 2023 to MDEQ.

By email dated June 30, 2025, Respondent submitted documentation to MDEQ showing the unpermitted fuel storage tank had been removed from the facility.

## 2.

In lieu of a formal enforcement hearing concerning the violations listed above, Complainant and Respondent agree to settle this matter as follows:

- A. Respondent agrees to pay and Complainant agrees to accept a civil penalty in the amount of \$4,500.00. Respondent shall pay this penalty to MDEQ within forty-five

(45) days after this Agreed Order has been executed by the MDEQ Executive Director or his designee. The settlement payment shall be submitted to:

Mississippi Department of Environmental Quality

Attn: Accounts Receivable

P.O. Box 2339

Jackson, MS 39225

3.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission in the event Respondent fails to comply with this Agreed Order. The Agreed Order shall be strictly construed to apply to those matters expressly resolved herein.

4.

Nothing contained in this Agreed Order shall limit the rights of MDEQ or the Commission to take enforcement or other actions against Respondent for violations not addressed herein and for future violations of environmental laws, rules, and regulations.

5.

Respondent understands and acknowledges that it is entitled to an evidentiary hearing before the Commission pursuant to Miss. Code Ann. § 49-17-31, and that it has made an informed waiver of that right.

ORDERED, this the 5<sup>th</sup> day of January, 2025.

MISSISSIPPI COMMISSION ON  
ENVIRONMENTAL QUALITY

BY: [Signature]  
CHRIS WELLS  
EXECUTIVE DIRECTOR  
MISSISSIPPI DEPARTMENT  
OF ENVIRONMENTAL QUALITY

AGREED, this the 24<sup>th</sup> day of December, 2025.

SOUTHEASTERN RAILWAY SERVICES

BY: [Signature]  
ALVIN CULLOM  
PRESIDENT

STATE OF Mississippi  
COUNTY OF Pike

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named ALVIN CULLOM, who first being duly sworn, did state upon his oath and acknowledge to me that he is the PRESIDENT of SOUTHEASTERN RAILWAY SERVICES and is authorized to sign and enter this Agreement.

SWORN AND SUBSCRIBED BEFORE ME, this the 24 day of December 2025.



My Commission expires: 1-3-28

[Signature]  
NOTARY PUBLIC  
[Signature] De