

**EXECUTIVE SUMMARY - ENFORCEMENT MATTER**  
**DOCKET NO.:** 2006-1741-PWS-E **TCEQ ID:** RN101196251 **CASE NO.:** 31299  
**RESPONDENT NAME:** City of Robinson

**ORDER TYPE:**

<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> EMERGENCY ORDER	

**CASE TYPE:**

<input type="checkbox"/> AGRICULTURE	<input type="checkbox"/> AIR	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE	<input type="checkbox"/> MUNICIPAL SOLID WASTE
<input type="checkbox"/> OCCUPATIONAL CERTIFICATION	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input checked="" type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> RADIOACTIVE WASTE
<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL	<input type="checkbox"/> USED OIL
<input type="checkbox"/> USED OIL FILTER	<input type="checkbox"/> WATER QUALITY		

**SITE WHERE VIOLATION(S) OCCURRED:** City of Robinson, 930 East Tinsley , Robinson, McLennan County

**TYPE OF OPERATION:** Public water supply

**SMALL BUSINESS:** \_\_\_ Yes  No

**OTHER SIGNIFICANT MATTERS:** There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.

**INTERESTED PARTIES:** No one other than the ED and the Respondent has expressed an interest in this matter.

**COMMENTS RECEIVED:** The *Texas Register* comment period expired on March 19, 2007. No comments were received.

**CONTACTS AND MAILING LIST:**

**TCEQ Attorney/SEP Coordinator:** None

**TCEQ Enforcement Coordinator:** Mr. Epifanio Villarreal, Enforcement Division, Enforcement Section I, MC R-13, (210) 403-4033; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

**TCEQ Field Investigator:** Mr. Michael Angel, Waco Regional Office, MC R-09, (254) 761-3007

**Respondent:** The Honorable Bryan Ferguson, Mayor, City of Robinson, 111 West Lyndale Avenue, Robinson, Texas 76706  
Mr. R.C. Fletcher, City Manager, City of Robinson, 111 West Lyndale Avenue, Robinson, Texas 76706

**Respondent's Attorney:** Not represented by counsel on this enforcement matter

**VIOLATION SUMMARY CHART:**

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p><b>Type of Investigation:</b> <input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine  <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p><b>Date of Complaint Relating to this Case:</b> None</p> <p><b>Date of Investigation Relating to this Case:</b> May 5, 2006</p> <p><b>Dates of NOV's Relating to this Case:</b> February 27, 2003 and October 22, 2004 (NOVs); August 29, 2006 (NOE)</p> <p><b>Background Facts:</b> This was a routine investigation. Six violations were documented.</p> <p><b>WATER</b></p> <p>1) Failed to maintain water works operation and maintenance records and make those records available to Commission personnel for review at the time of the investigation. Specifically, at the time of the investigation, there were no records demonstrating verification of ANSI/NSF Standard 60 for Magniflox and Calcium Hypochlorite [30 TEX. ADMIN. CODE § 290.46(f)(2)].</p> <p>2) Failed to calibrate flow measuring devices and rate-of-flow controllers once every twelve months. Specifically, the filter backwash meter had not been calibrated in the last twelve months [30 TEX. ADMIN. CODE § 290.46(s)(1)].</p> <p>3) Failed to protect all water wells with an intruder resistant fence with lockable gates. Specifically, at the time of the investigation, the Shamrock Plant's fence was only 65 inches in height [30 TEX. ADMIN. CODE § 290.41(c)(3)(O)].</p> <p>4) Failed to initiate maintenance housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment at the facility. Specifically, at the time of the investigation, it was observed that the fences at well site nos. 3 and 7 were overgrown with vegetation [30 TEX. ADMIN. CODE § 290.46(m)].</p>	<p><b>Total Assessed:</b> \$1,994</p> <p><b>Total Deferred:</b> \$399  <input checked="" type="checkbox"/> Expedited Settlement  <input type="checkbox"/> Financial Inability to Pay</p> <p><b>SEP Conditional Offset:</b> \$0</p> <p><b>Total Paid to General Revenue:</b> \$1,595</p> <p><b>Site Compliance History Classification:</b> <input type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p><b>Person Compliance History Classification:</b> <input type="checkbox"/> High <input checked="" type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p><b>Major Source:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>Applicable Penalty Policy:</b> September 2002</p>	<p><b>Corrective Actions Taken:</b></p> <p>The Executive Director recognizes that the City submitted compliance documentation for the Facility on September 15, 2006 and has implemented the following corrected measures:</p> <p>a. Provided verification of records for ANSI/NSF Standard 60 for Magniflox and Calcium Hypochlorite;</p> <p>b. Provided a certificate of calibration for the backwash meter;</p> <p>c. Repaired the height of the fence and replaced a portion of the fence to meet compliance;</p> <p>d. Began initiating a maintenance program to ensure the appearance of the facility by clearing the overgrown vegetation from the fences at well site nos. 3 and 7;</p> <p>e. Repaired the sulfuric acid injection line at the surface water treatment plant; and</p> <p>f. Repaired and replaced the roof hatch seal.</p>

RESPONDENT'S NAME: City of Robinson  
DOCKET NO.: 2006-1741-PWS-E

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>5) Failed to maintain all treatment units, storage and pressure maintenance facilities, distribution system lines and related appurtenances in a watertight condition. Specifically, at the time of the investigation, there was a leak in the sulfuric acid injection line at the surface water treatment plant [30 TEX. ADMIN. CODE § 290.46(m)(4)].</p> <p>6) Failed to provide a positive roof hatch with a seal/gasket on the ground water storage tank. Specifically, at the time of the investigation, the existing gasket on the mixing tank's roof hatch did not form a positive seal [30 TEX. ADMIN. CODE § 290.43(c)(2)].</p>		





Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

<b>DATES</b>	<b>Assigned</b>	05-Sep-2006			
	<b>PCW</b>	26-Sep-2006	<b>Screening</b>	26-Sep-2006	<b>EPA Due</b>

<b>RESPONDENT/FACILITY INFORMATION</b>	
<b>Respondent</b>	City of Robinson
<b>Reg. Ent. Ref. No.</b>	RN101196251
<b>Facility/Site Region</b>	9-Waco
<b>Major/Minor Source</b>	Major Source

<b>CASE INFORMATION</b>			
<b>Enf./Case ID No.</b>	31299	<b>No. of Violations</b>	6
<b>Docket No.</b>	2006-1741-PWS-E	<b>Order Type</b>	1660
<b>Media Program(s)</b>	Public Water Supply	<b>Enf. Coordinator</b>	Epifanio Villarreal
<b>Multi-Media</b>		<b>EC's Team</b>	Enforcement Team 2
<b>Admin. Penalty \$ Limit Minimum</b>	\$50	<b>Maximum</b>	\$1,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>	<b>Subtotal 1</b>	\$1,810
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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.

<b>Compliance History</b>	18% Enhancement	<b>Subtotals 2, 3, &amp; 7</b>	\$326
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**Notes**  
The penalty enhancement is due to two prior Notices of Violation ("NOVs") issued for the same violations as are in the current enforcement case and four dissimilar prior NOVs.

<b>Culpability</b>	No	0% Enhancement	<b>Subtotal 4</b>	\$0
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**Notes**  
The respondent does not meet culpability criteria.

<b>Good Faith Effort to Comply</b>	10% Reduction	<b>Subtotal 5</b>	-\$181
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		X
N/A		(mark with a small x)

**Notes**  
The respondent achieved compliance on September 15, 2006.

<b>Economic Benefit</b>	0% Enhancement*	<b>Subtotal 6</b>	\$0
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Total EB Amounts	\$172	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$2,900	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$1,955
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	<b>Adjustment</b>	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

**Notes**

**Final Penalty Amount** \$1,955

<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$1,994
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<b>DEFERRAL</b>	20% Reduction	<b>Adjustment</b>	-\$399
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

**Notes**

Deferral offered for expedited settlement.

<b>PAYABLE PENALTY</b>	\$1,595
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<b>Screening Date</b>	26-Sep-2006	<b>Docket No.</b>	2006-1741-PWS-E	<b>PCW</b>
<b>Respondent</b>	City of Robinson	Policy Revision 2 (September 2002)		
<b>Case ID No.</b>	31299	PCW Revision May 19, 2005		
<b>Reg. Ent. Reference No.</b>	RN101196251			
<b>Media [Statute]</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Epifanio Villarreal			

**Compliance History Worksheet**

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

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	2	10%
	Other written NOVs	4	8%
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 judgements 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 (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 ( <i>number of audits for which notices were</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)** 18%

>> **Repeat Violator (Subtotal 3)**

N/A  **Adjustment Percentage (Subtotal 3)** 0%

>> **Compliance History Person Classification (Subtotal 7)**

Average Performer  **Adjustment Percentage (Subtotal 7)** 0%

>> **Compliance History Summary**

**Compliance History Notes** The penalty enhancement is due to two prior Notices of Violation ("NOVs") issued for the same violations as are in the current enforcement case and four dissimilar prior NOVs.

**Total Adjustment Percentage (Subtotals 2, 3, & 7)** 18%

<b>Screening Date</b>	26-Sep-2006	<b>Docket No.</b>	2006-1741-PWS-E	<b>PCW</b>
<b>Respondent</b>	City of Robinson	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	31299	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN101196251			
<b>Media [Statute]</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Epifanio Villarreal			
<b>Violation Number</b>	1			
<b>Primary Rule Cite(s)</b>	30 Tex. Admin. Code § 290.46(f)(2)			
<b>Secondary Rule Cite(s)</b>				
<b>Violation Description</b>	Failure to maintain water works operation and maintenance records and make those records available to Commission personnel for review at the time of the investigation. Specifically, at the time of the investigation, there were no records demonstrating verification of ANSI/NSF Standard 60 for Magniflox and Calcium Hypochlorite.			

**Base Penalty**

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

		Harm			
Release		Major	Moderate	Minor	
OR	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> **Programmatic Matrix**

		Major	Moderate	Minor	
	Falsification	<input type="text"/>	<input type="text"/>	<input checked="" type="checkbox"/>	Percent <input type="text" value="1%"/>

Matrix Notes

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

mark only one use a small x	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input checked="" type="checkbox"/>

**Violation Base Penalty**

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
Estimated EB Amount <input type="text" value="\$11"/>	Violation Final Penalty Total <input type="text" value="\$11"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$50"/>	

### Economic Benefit Worksheet

Respondent: City of Robinson  
 Case ID No: 31299  
 Reg. Ent. Reference No: RN101196251  
 Media [Statute]: Public Water Supply  
 Violation No: 1

Percent Interest	Years of Depreciation
5.0	15

Item	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Overtime Costs	EB Amount
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Description: No commas or \$

**Delayed Costs**

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	\$600	05-May-2006	15-Sep-2006	0.4	\$11	n/a	\$11
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs

The delayed costs include the amount required to maintain monthly operation records, calculated from the date of the investigation to date of compliance.

**Avoided Costs**

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$600

**TOTAL** \$11



<b>Screening Date</b>	26-Sep-2006	<b>Docket No.</b>	2006-1741-PWS-E	<b>PCW</b>
<b>Respondent</b>	City of Robinson	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	31299	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN101196251			
<b>Media [Statute]</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Epifanio Villarreal			
<b>Violation Number</b>	<input type="text" value="2"/>			
<b>Primary Rule Cite(s)</b>	<input type="text" value="30 Tex. Admin. Code § 290.46(s)(1)"/>			
<b>Secondary Rule Cite(s)</b>				
<b>Violation Description</b>	<input type="text" value="Failure to calibrate flow measuring devices and rate-of-flow controllers once every twelve months. Specifically, the filter backwash meter had not been calibrated in the last twelve months."/>			
<b>Base Penalty</b>	<input type="text" value="\$1,000"/>			

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

		<b>Harm</b>			
	<b>Release</b>	Major	Moderate	Minor	
OR	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<b>Percent</b> <input type="text" value="10%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input checked="" type="checkbox"/>	

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	<b>Percent</b> <input type="text"/>
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
<b>Matrix Notes</b>	<input type="text" value="Failure to have all flow measuring devices and rate-of-flow controllers properly calibrated could result in inaccurate or unavailable data concerning the effectiveness of the chemical treatment of the water provided to the water supply's customers."/>				

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

mark only one use a small x	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input checked="" type="checkbox"/>

**Violation Base Penalty**

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
<b>Estimated EB Amount</b> <input type="text" value="\$105"/>	<b>Violation Final Penalty Total</b> <input type="text" value="\$108"/>
<b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$108"/>	

### Economic Benefit Worksheet

Respondent: City of Robinson  
 Case ID No: 31299  
 Reg. Ent. Reference No: RN101196251  
 Media [Statute]: Public Water Supply  
 Violation No: 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs							

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]	\$100	05-May-2006	15-Sep-2006	1.0	\$5	\$100	\$105
Other (as needed)				0.0	\$0	\$0	\$0
Notes for AVOIDED costs The avoided costs to properly calibrate the filter backwash meter, calculated from the May 5, 2006 investigation to the date of compliance.							

Approx. Cost of Compliance \$100

**TOTAL** \$105

<b>Screening Date</b>	26-Sep-2006	<b>Docket No.</b>	2006-1741-PWS-E	<b>PCW</b>
<b>Respondent</b>	City of Robinson	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	31299	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN101196251			
<b>Media [Statute]</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Epifanio Villarreal			
<b>Violation Number</b>	3			
<b>Primary Rule Cite(s)</b>	30 Tex. Admin. Code § 290.41(c)(3)(O)			
<b>Secondary Rule Cite(s)</b>				
<b>Violation Description</b>	Failure to protect all water wells with an intruder resistant fence with lockable gates. Specifically, at the time of the investigation, the Shamrock Plant's fence was only 65 inches in height.			
<b>Base Penalty</b>	\$1,000			

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

		Harm			
Release		Major	Moderate	Minor	
OR	Actual				Percent <input type="text" value="25%"/>
	Potential		X		

>> **Programmatic Matrix**

		Falsification	Major	Moderate	Minor	
						Percent <input type="text"/>

**Matrix Notes**

Not providing proper intruder-resistant protection for the water well could expose the public to a significant amount of pollutants which would not exceed levels that are protective of human health or the environment.

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

mark only one use a small x	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input checked="" type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>

single event

**Violation Base Penalty**

Two quarterly events are recommended from the date of the investigation, May 5, 2006 to the date of compliance, September 15, 2006.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$38"/>	Violation Final Penalty Total <input type="text" value="\$540"/>
<b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$540"/>	

### Economic Benefit Worksheet

Respondent: City of Robinson  
 Case ID No: 31299  
 Reg. Ent. Reference No: RN101196251  
 Media [Statute]: Public Water Supply  
 Violation No: 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime	EB
						Costs	Amount

Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	\$1,500	05-May-2006	15-Sep-2006	0.4	\$2	\$36	\$38
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to repair the intruder-resistant fence. The date required is the date of the investigation May 5, 2006. The final date is the date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$1,500

**TOTAL** \$38

<b>Screening Date</b>	26-Sep-2006	<b>Docket No.</b>	2006-1741-PWS-E	<b>PCW</b>
<b>Respondent</b>	City of Robinson	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	31299	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN101196251			
<b>Media [Statute]</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Epifanio Villarreal			
<b>Violation Number</b>	<input type="text" value="4"/>			
<b>Primary Rule Cite(s)</b>	<input type="text" value="30 Tex. Admin. Code § 290.46(m)"/>			
<b>Secondary Rule Cite(s)</b>	<input type="text"/>			
<b>Violation Description</b>	Failure to initiate maintenance housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment at the facility. Specifically, at the time of the investigation, it was observed that the fences at well site nos. 3 and 7 were overgrown with vegetation.			
<b>Base Penalty</b>	<input type="text" value="\$1,000"/>			

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

OR	<b>Harm</b>			Percent <input type="text" value="10%"/>	
	<b>Release</b>	Major	Moderate		Minor
	Actual	<input type="text"/>	<input type="text"/>		<input type="text"/>
	Potential	<input type="text"/>	<input type="text"/>		<input checked="" type="checkbox"/>

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	Percent <input type="text"/>
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	

Matrix Notes: Failure to maintain the grounds around the water supply could result in customers of the water supply being exposed to insignificant amounts of contaminants which would not exceed levels that are protective of human health.

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

mark only one use a small x	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input checked="" type="checkbox"/>

**Violation Base Penalty**

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
Estimated EB Amount <input type="text" value="\$5"/>	Violation Final Penalty Total <input type="text" value="\$216"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$216"/>	

### Economic Benefit Worksheet

Respondent City of Robinson  
 Case ID No. 31299  
 Reg. Ent. Reference No. RN101196251  
 Media [Statute] Public Water Supply  
 Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------	-----------	---------------	------------	-----	----------------	---------------	-----------

Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	\$200	05-May-2006	15-Sep-2006	0.4	\$0	\$5	\$5
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: The delayed costs include the amount to initiate maintenance and good housekeeping practices at the facility, calculated from the date of the investigation to date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$200

**TOTAL** \$5

<b>Screening Date</b>	26-Sep-2006	<b>Docket No.</b>	2006-1741-PWS-E	<b>PCW</b>
<b>Respondent</b>	City of Robinson	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	31299	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN101196251			
<b>Media [Statute]</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Epifanio Villarreal			
<b>Violation Number</b>	<input type="text" value="5"/>			
<b>Primary Rule Cite(s)</b>	<input type="text" value="30.Tex. Admin. Code § 290.46(m)(4)"/>			
<b>Secondary Rule Cite(s)</b>	<input type="text"/>			
<b>Violation Description</b>	Failure to maintain all treatment units, storage and pressure maintenance facilities, distribution system lines and related appurtenances in a watertight condition. Specifically, at the time of the investigation, there was a leak in the sulfuric acid injection line at the surface water treatment plant.			
<b>Base Penalty</b>	<input type="text" value="\$1,000"/>			

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

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="25%"/>
Potential	<input type="text"/>	<input checked="" type="checkbox"/>	<input type="text"/>	

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	Percent
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Matrix Notes**  
 Failure to maintain the water system in a watertight condition, could allow contaminants to enter the water system which would not exceed levels protective of human health.

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

mark only one use a small x

daily	<input type="text"/>
monthly	<input type="text"/>
quarterly	<input checked="" type="checkbox"/>
semiannual	<input type="text"/>
annual	<input type="text"/>
single event	<input type="text"/>

**Violation Base Penalty**

Two quarterly events are recommended from the date of the investigation, May 5, 2006 to the date of compliance, September 15, 2006.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$10"/>	Violation Final Penalty Total <input type="text" value="\$540"/>
<b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$540"/>	

### Economic Benefit Worksheet

Respondent: City of Robinson  
 Case ID No.: 31299  
 Reg. Ent. Reference No.: RN101196251  
 Media [Statute]: Public Water Supply  
 Violation No.: 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	\$400	05-May-2006	15-Sep-2006	0.4	\$0	\$10	\$10
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: The delayed cost includes the amount to repair the leak, calculated from the date of the investigation to the date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance: \$400 TOTAL \$10



<b>Screening Date</b>	26-Sep-2006	<b>Docket No.</b>	2006-1741-PWS-E	<b>PCW</b>
<b>Respondent</b>	City of Robinson	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	31299	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN101196251			
<b>Media [Statute]</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Epifanio Villarreal			
<b>Violation Number</b>	6			
<b>Primary Rule Cite(s)</b>	30 Tex. Admin. Code § 290.43(c)(2)			
<b>Secondary Rule Cite(s)</b>				
<b>Violation Description</b>	Failure to provide the roof hatch with a gasket to form a positive seal.			
<b>Base Penalty</b>				\$1,000

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

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				25%
Potential		X		

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	Percent

**Matrix Notes**  
 Failure to provide a roof hatch with a gasket to form a positive seal could cause customers of the water supply to be exposed to significant amounts of contaminants that would not exceed levels protective of human health.

**Adjustment** -\$750

**Base Penalty Subtotal** \$250

**Violation Events**

**Number of Violation Events** 2

<i>mark only one use a small x</i>	<i>daily</i>	
	<i>monthly</i>	
	<i>quarterly</i>	X
	<i>semiannual</i>	
	<i>annual</i>	
	<i>single event</i>	

**Violation Base Penalty** \$500

Two quarterly events are recommended from the date of the investigation, May 5, 2006 to the date of compliance, September 15, 2006.

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
<b>Estimated EB Amount</b> \$3	<b>Violation Final Penalty Total</b> \$540
<b>This violation Final Assessed Penalty (adjusted for limits)</b> \$540	

**Economic Benefit Worksheet**

Respondent: City of Robinson  
 Case ID No.: 31299  
 Reg. Ent. Reference No.: RN101196251  
 Media [Statute]: Public Water Supply  
 Violation No.: 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

Delayed Costs							
Equipment	\$100	05-May-2006	15-Sep-2006	0.4	\$0	\$2	\$3
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: The delayed costs include the amount to initiate maintenance and good housekeeping practices at the facility, calculated from the date of the investigation to the date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance:  TOTAL:

# Compliance History

Customer/Respondent/Owner-Operator: CN600641765 City of Robinson Classification: AVERAGE Rating: 0.32  
 Regulated Entity: RN101196251 CITY OF ROBINSON Classification: N/A Site Rating:

ID Number(s): PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 1550010  
 WATER LICENSING LICENSE 1550010

Location: 930 EAST TINSLEY, ROBINSON, TEXAS

TCEQ Region: REGION 09 - WACO

Date Compliance History Prepared: September 26, 2006

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: September 26, 2001 to September 26, 2006

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Epi Villarreal Phone: 210-403-4033

## Site Compliance History Components

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 of the site during the compliance period? No
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

### Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.  
 N/A

B. Any criminal convictions of the state of Texas and the federal government.  
 N/A

C. Chronic excessive emissions events.  
 N/A

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

08/29/2006	(464070)
08/16/2006	(489853)
05/12/2004	(271062)
01/14/2004	(256578)
10/18/2004	(335958)
03/01/2004	(263935)
04/04/2003	(31113)
11/30/2004	(340728)
02/21/2003	(19212)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 02/27/2003	(19212)	
Self Report? NO		Classification: Minor
Citation:	30 TAC Chapter 290, SubChapter D 290.46(m)(4)	
Description:	Failure to maintain all water storage facilities in a watertight condition.	
Self Report? NO		Classification: Minor
Citation:	30 TAC Chapter 290, SubChapter D 290.46(m)[G]	
Description:	Failure to maintain the service pumps.	

Date: 10/22/2004 (335958) Classification: Moderate  
Self Report? NO  
Citation: 30 TAC Chapter 290, SubChapter D 290.44(h)(1)(A)  
Description: Failure to install backflow prevention assemblies or an air gap at all residences or establishments where an actual or potential contamination hazard exists.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(O)  
30 TAC Chapter 290, SubChapter D 290.43(e)  
Description: Failure to provide an intruder-resistant fence in order to protect the well and the ground storage tank.

Date: 03/01/2004 (263935) Classification: Minor  
Self Report? NO  
Citation: 30 TAC Chapter 290, SubChapter D 290.46(e)(2)  
Description: Failure by the regulated entity, which serves more than 1,000 connections, to employ at least two operators who possess a valid class "B" or higher water operator license.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.44(d)(1)  
Description: Failure to properly install air release devices in the distribution system.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(J)  
Description: Failure to provide a concrete sealing block that extends at least 3 feet from the exterior well casing in all directions.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(8)  
Description: Failure to properly maintain the exterior coating on the ground storage tank.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(8)  
Description: Failure to maintain the exterior coating on the ground storage tank.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(8)  
Description: Failure to maintain the exterior coating on the ground storage tank.

Date: 01/12/2004 (256578) Classification: Minor  
Self Report? NO  
Citation: 30 TAC Chapter 290, SubChapter D 290.46(e)(2)  
Description: Failure by the regulated entity, which serves more than 1,000 connections, to employ at least two operators who possess a valid class "B" or higher water operator license.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.44(d)(1)  
Description: Failure to properly install air release devices in the distribution system.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(J)  
Description: Failure to provide a concrete sealing block that extends at least 3 feet from the exterior well casing in all directions.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(8)  
Description: Failure to properly maintain the exterior coating on the ground storage tank.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(8)  
Description: Failure to maintain the exterior coating on the ground storage tank.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(8)  
Description: Failure to maintain the exterior coating on the ground storage tank.

Date: 08/16/2006 (465100)

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 330, SubChapter A 330.15

Description: Failure to dispose of solid waste at an approved facility.

Date: 07/04/2006 (483286)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.44(d)[G]

30 TAC Chapter 290, SubChapter D 290.46(r)

Description: Failure to design and maintain a water distribution system to provide at all times a minimum pressure of 35 pounds per square inch (psi).

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

10/10/2010

10/10/2010

10/10/2010

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10/10/2010

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
CITY OF ROBINSON  
RN101196251

§ BEFORE THE  
§ TEXAS COMMISSION ON  
§ ENVIRONMENTAL QUALITY

AGREED ORDER  
DOCKET NO. 2006-1741-PWS-E

I. JURISDICTION AND STIPULATIONS

At its \_\_\_\_\_ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding City of Robinson ("the City") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the City appear before the Commission and together stipulate that:

1. The City owns and operates a public water supply at 930 East Tinsley, Robinson, McLennan County, Texas (the "Facility") that has approximately 3,894 service connections and serves at least 25 people per day for at least 60 days per year.
2. The Commission and the City agree that the Commission has jurisdiction to enter this Agreed Order, and that the City is subject to the Commission's jurisdiction.
3. The City received notices of the violations alleged in Section II ("Allegations") dated February 27, 2003 and October 22, 2004.
4. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the City of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
5. An administrative penalty in the amount of One Thousand Nine Hundred Ninety-Four Dollars (\$1,994) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The City has paid One Thousand Five Hundred Ninety-Five Dollars (\$1,595) of the administrative penalty and Three Hundred Ninety-Nine Dollars (\$399) is deferred contingent upon the City's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the City fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the City to pay all or part of the deferred penalty.

7

THE UNIVERSITY OF CHICAGO



THE UNIVERSITY OF CHICAGO  
DIVISION OF THE PHYSICAL SCIENCES  
DEPARTMENT OF CHEMISTRY

RECEIVED  
JAN 15 1954  
CHEMISTRY DEPARTMENT  
UNIVERSITY OF CHICAGO

MEMORANDUM FOR THE RECORD

DATE: JAN 15 1954

1. The following is a summary of the results of the experiments conducted during the past few weeks. The results are in good agreement with the theoretical predictions of the authors.

2. The first experiment was designed to determine the effect of temperature on the rate of reaction. The results show that the rate increases with increasing temperature.

3. The second experiment was designed to determine the effect of concentration on the rate of reaction. The results show that the rate increases with increasing concentration.

4. The third experiment was designed to determine the effect of catalyst on the rate of reaction. The results show that the rate increases with increasing catalyst concentration.

5. The fourth experiment was designed to determine the effect of solvent on the rate of reaction. The results show that the rate increases with increasing solvent concentration.

6. The fifth experiment was designed to determine the effect of pressure on the rate of reaction. The results show that the rate increases with increasing pressure.



6. 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.
7. The Executive Director of the TCEQ and the City have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
8. The Executive Director recognizes that the City submitted compliance documentation for the Facility on September 15, 2006 and has implemented the following corrected measures:
  - a. Provided verification of records for ANSI/NSF Standard 60 for Magniflox and Calcium Hypochlorite;
  - b. Provided a certificate of calibration for the backwash meter;
  - c. Repaired the height of the fence and replaced a portion of the fence to meet compliance;
  - d. Began initiating a maintenance program to ensure the appearance of the facility by clearing the overgrown vegetation from the fences at well site nos. 3 and 7;
  - e. Repaired the sulfuric acid injection line at the surface water treatment plant; and
  - f. Repaired and replaced the roof hatch seal.
9. 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 City has not complied with one or more of the terms or conditions in this Agreed Order.
10. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
11. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

## II. ALLEGATIONS

As owner and operator of the Facility, the City is alleged to have:

1. Failed to maintain water works operation and maintenance records and make those records available to Commission personnel for review at the time of the investigation, in violation of 30 TEX. ADMIN. CODE § 290.46(f)(2), as documented during an investigation conducted on May 5, 2006. Specifically, at the time of the investigation, there were no records demonstrating verification of ANSI/NSF Standard 60 for Magniflox and Calcium Hypochlorite.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions.

2. It is essential to ensure that all entries are supported by proper documentation and receipts.

3. Regular audits should be conducted to verify the accuracy of the records and identify any discrepancies.

4. The second part of the document outlines the procedures for handling cash and credit transactions.

5. All cash receipts should be recorded immediately and deposited in a secure bank account.

6. Credit sales should be recorded at the time of sale, and the amount should be tracked until payment is received.

7. The third part of the document provides guidelines for managing inventory and stock levels.

8. Inventory should be counted regularly to ensure that the recorded amounts match the actual quantities on hand.

9. The fourth part of the document discusses the importance of maintaining accurate financial statements.

10. These statements should be prepared on a regular basis and reviewed by management to assess the company's financial health.

11. The fifth part of the document outlines the procedures for handling payroll and employee benefits.

12. Payroll records should be maintained accurately, and all payments should be made on time.

13. The sixth part of the document discusses the importance of maintaining accurate tax records.

14. All tax-related transactions should be recorded, and the company should comply with all applicable tax laws and regulations.

15. The final part of the document provides a summary of the key points discussed and offers recommendations for improving financial management practices.

2. Failed to calibrate flow measuring devices and rate-of-flow controllers once every twelve months, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(1), as documented during an investigation conducted on May 5, 2006. Specifically, the filter backwash meter had not been calibrated in the last twelve months.
3. Failed to protect all water wells with an intruder resistant fence with lockable gates, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(3)(O), as documented during an investigation conducted on May 5, 2006. Specifically, at the time of the investigation, the Shamrock Plant's fence was only 65 inches in height.
4. Failed to initiate maintenance housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment at the facility, in violation of 30 TEX. ADMIN. CODE § 290.46(m), as documented during an investigation conducted on May 5, 2006. Specifically, at the time of the investigation, it was observed that the fences at well site nos. 3 and 7 were overgrown with vegetation.
5. Failed to maintain all treatment units, storage and pressure maintenance facilities, distribution system lines and related appurtenances in a watertight condition, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(4), as documented during an investigation conducted on May 5, 2006. Specifically, at the time of the investigation, there was a leak in the sulfuric acid injection line at the surface water treatment plant.
6. Failed to provide a positive roof hatch with a seal/gasket on the ground water storage tank, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(2), as documented during an investigation conducted on May 5, 2006. Specifically, at the time of the investigation, the existing gasket on the mixing tank's roof hatch did not form a positive seal.

### III. DENIALS

The City generally denies each allegation in Section II ("Allegations").

### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the City pay an administrative penalty as set forth in Section I, Paragraph 5 above. The payment of this administrative penalty and the City's compliance with all the terms and conditions set forth in this Agreed 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. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Robinson, Docket No. 2006-1741-PWS-E" to:

The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential for ensuring transparency and accountability in the organization's operations.

Furthermore, it highlights the need for regular audits and reviews to identify any discrepancies or areas for improvement. This process should be conducted in a systematic and thorough manner to ensure the integrity of the data.

In addition, the document stresses the importance of clear communication and collaboration between all departments. This will help to ensure that everyone is working towards the same goals and objectives, and that any issues are resolved promptly.

Overall, the document provides a comprehensive overview of the organization's current state and outlines the key areas for focus. It serves as a valuable tool for management and staff alike, providing a clear direction for the future.

The document concludes by reiterating the commitment to excellence and the pursuit of continuous improvement. It encourages all employees to take ownership of their roles and contribute to the overall success of the organization.

### Conclusion

The document provides a clear and concise summary of the organization's current state and future goals.

It is a valuable resource for all employees and management alike.

The document is a comprehensive overview of the organization's current state and future goals. It provides a clear and concise summary of the organization's current state and future goals. It is a valuable resource for all employees and management alike. The document is a comprehensive overview of the organization's current state and future goals. It provides a clear and concise summary of the organization's current state and future goals. It is a valuable resource for all employees and management alike.

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

2. The provisions of this Agreed Order shall apply to and be binding upon the City. The City is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against the City in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed 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.
4. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the City, or three days after the date on which the Commission mails notice of the Order to the City, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

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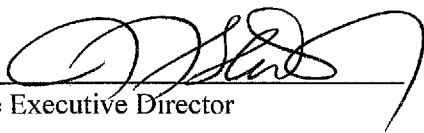
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**SIGNATURE PAGE**

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

\_\_\_\_\_  
For the Commission

  
\_\_\_\_\_  
For the Executive Director

3/26/07  
\_\_\_\_\_  
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, 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 my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

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

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

  
\_\_\_\_\_  
Signature

Dec 13, 2006  
\_\_\_\_\_  
Date

R. C. Fletcher  
\_\_\_\_\_  
Name (Printed or typed)  
Authorized Representative of  
City of Robinson

City Manager  
\_\_\_\_\_  
Title

**Instructions:** Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

1/11/20

1/11/20

Dr. [unclear]

City [unclear]

[unclear]

[unclear]