

EXECUTIVE SUMMARY - ENFORCEMENT MATTER

DOCKET NO.: 2008-1164-PWS-E TCEQ ID: RN104103247 CASE NO.: 36215

RESPONDENT NAME: GUSS LINES DBA LINES CACTUS GROVE MOBILE HOME PARK

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

CASE TYPE:		
<input type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL HAZARDOUS WASTE
<input checked="" type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION

SITE WHERE VIOLATION(S) OCCURRED: 2408 West Highway 90, Alpine, Brewster County

TYPE OF OPERATION: Public water system

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 expressed an interest in this matter.

COMMENTS RECEIVED: The *Texas Register* comment period expired February 23, 2009. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney: Ms. Peipey Tang, Litigation Division, MC 175, (512) 239-0654
 Ms. Lena Roberts, Litigation Division, MC 175, (512) 239-0019

TCEQ Enforcement Coordinator: Ms. Rebecca Clausewitz, Water Enforcement Section, MC R-13, (210) 403-4012

TCEQ Regional Contact: Mr. Kent Waggoner, El Paso Regional Office, MC R-6, (915) 834-4949

Respondent: Mr. Guss Lines, Owner, Lines Cactus Grove Mobile Home Park, 2408 West Highway 90, Alpine, Texas 79830

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

RESPONDENT NAME: GUSS LINES DBA LINES CACTUS GROVE
MOBILE HOME PARK
DOCKET NO.: 2008-1164-PWS-E

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation:</p> <p><input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date of Complaint Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: May 27, 2008</p> <p>Date of NOE Relating to this Case: May 29, 2008</p> <p>Background Facts: The EDPRP was filed October 20, 2008. The Respondent signed the Agreed Order November 19, 2008.</p> <p>Current Compliance Status: The Respondent is not yet in compliance.</p> <p>PWS: Failed to mail or directly deliver one copy of the Consumer Confidence Report ("CCR") to each bill paying customer by July 1 of each year and failed to submit a copy of the annual CCR and certification that the CCR has been distributed to the customers of the water system and that the information in the CCR is correct and consistent with compliance monitoring data to the TCEQ by July 1 of each year [30 TEX. ADMIN. CODE §§ 290.271(b) and 290.274(a) and (c)].</p>	<p>Total Assessed: \$1,191</p> <p>Total Deferred: \$0</p> <p><input type="checkbox"/> Expedited Order <input type="checkbox"/> Financial Inability to Pay <input type="checkbox"/> SEP Conditional Offset</p> <p>Total Paid to General Revenue: \$1,191</p> <p>The Respondent has paid the \$1,191 administrative penalty in full.</p> <p>Site Compliance History Classification: N/A</p> <p>Person Compliance History Classification: N/A</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Ordering Provisions:</p> <p>The Respondent shall:</p> <ol style="list-style-type: none"> 1. Within 30 days: <ol style="list-style-type: none"> a. Mail or directly deliver a copy of the 2007 CCR to all bill paying customers of the water system, and make a good faith effort to deliver a copy of the 2007 CCR to all non-bill paying consumers of the water system; and b. Submit to the Commission a copy of the 2007 CCR provided to customers of the water system, and the certification that the CCR has been distributed to the customers of the water system and that the information in the CCR is correct and consistent with the compliance monitoring data. 2. Within 45 days, submit written certification to demonstrate compliance with these Ordering Provisions.



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision June 12, 2008

DATES	Assigned	9-Jun-2008			
	PCW	27-Jun-2008	Screening	23-Jun-2008	EPA Due 28-Feb-2005

RESPONDENT/FACILITY INFORMATION			
Respondent	Guss Lines dba Lines Cactus Grove Mobile Home Park		
Reg. Ent. Ref. No.	RN104103247		
Facility/Site Region	6-El Paso	Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	36215	No. of Violations	1
Docket No.	2008-1164-PWS-E	Order Type	1660
Media Program(s)	Public Water Supply	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Rebecca Clausewitz
		EC's Team	Enforcement Team 2
Admin. Penalty \$ Limit Minimum	\$50	Maximum	\$1,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	<i>Subtotal 1</i>	\$400
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ADJUSTMENTS (+/-) TO SUBTOTAL 1
 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	114.0% Enhancement	<i>Subtotals 2, 3, & 7</i>	\$456
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Notes: The compliance history enhancement is for 22 prior Notices of Violation (NOVs) containing violations that are the same as or similar to the violations in the current enforcement action and for two prior NOVs containing dissimilar violations.

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

Good Faith Effort to Comply Total Adjustments	<i>Subtotal 5</i>	\$0
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Economic Benefit	0.0% Enhancement*	<i>Subtotal 6</i>	\$0
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Total EB Amounts: \$335
 Approx. Cost of Compliance: \$280
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	<i>Final Subtotal</i>	\$856
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OTHER FACTORS AS JUSTICE MAY REQUIRE	39.1%	<i>Adjustment</i>	\$335
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: The enhancement is recommended to recover the avoided costs of compliance.

<i>Final Penalty Amount</i>	\$1,191
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STATUTORY LIMIT ADJUSTMENT	<i>Final Assessed Penalty</i>	\$1,191
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DEFERRAL	0.0%	Reduction	<i>Adjustment</i>	\$0
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral not offered for non-expedited settlement.

PAYABLE PENALTY	\$1,191
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Screening Date 23-Jun-2008

Docket No. 2008-1164-PWS-E

PCW

Respondent Guss Lines dba Lines Cactus Grove Mobile Home Park

Policy Revision 2 (September 2002)

Case ID No. 36215

PCW Revision June 12, 2008

Reg. Ent. Reference No. RN104103247

Media [Statute] Public Water Supply

Enf. Coordinator Rebecca Clausewitz

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 (number of NOVs meeting criteria)	22	110%
	Other written NOVs	2	4%
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	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 (number of judgements 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%

Please Enter Yes or No

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) 114%

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

N/A

Adjustment Percentage (Subtotal 3) 0%

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

N/A

Adjustment Percentage (Subtotal 7) 0%

>> **Compliance History Summary**

Compliance History Notes

The compliance history enhancement is for 22 prior Notices of Violation (NOVs) containing violations that are the same as or similar to the violations in the current enforcement action and for two prior NOV's containing dissimilar violations.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 114%

Screening Date 23-Jun-2008	Docket No. 2008-1164-PWS-E	PCW				
Respondent Guss Lines dba Lines Cactus Grove Mobile Home Park	<i>Policy Revision 2 (September 2002)</i>					
Case ID No. 36215	<i>PCW Revision June 12, 2008</i>					
Reg. Ent. Reference No. RN104103247						
Media [Statute] Public Water Supply						
Enf. Coordinator Rebecca Clausewitz						
Violation Number	1					
Rule Cite(s)	30 Tex. Admin. Code §§ 290.271(b), 290.274(a) and (c)					
Violation Description	Failed to mail or directly deliver one copy of the Consumer Confidence Report ("CCR") to each bill paying customer by July 1 of each year and failed to submit a copy of the annual CCR and certification that the CCR has been distributed to the customers of the water system and that the information in the CCR is correct and consistent with compliance monitoring data to the TCEQ by July 1 of each year. Specifically, the Respondent did not mail or directly deliver the CCRs to the water system's customers for the years 2003 through 2006, nor did the Respondent submit the CCRs or the required certification to the TCEQ for the years 2003 through 2006.					
Base Penalty		\$1,000				
>> Environmental, Property and Human Health Matrix						
OR	Harm					
	Release	Major	Moderate	Minor		
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>		
Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>			
		Percent	0%			
>> Programmatic Matrix						
		Falsification	Major	Moderate	Minor	
		<input type="text"/>	x	<input type="text"/>	<input type="text"/>	
					Percent	10%
Matrix Notes	100% of the rule requirements were not met.					
		Adjustment		\$900		
\$100						
Violation Events						
		Number of Violation Events	4	Number of violation days	1094	
<i>mark only one with an x</i>	daily	<input type="text"/>				
	monthly	<input type="text"/>				
	quarterly	<input type="text"/>				
	semiannual	<input type="text"/>				
	annual	x				
	single event	<input type="text"/>				
		Violation Base Penalty				\$400
Four annual events are recommended for the years in which no CCR or certification of delivery was submitted to the TCEQ.						
Good Faith Efforts to Comply		0.0% Reduction		\$0		
		Before NOV NOV to EDPRP/Settlement Offer				
Extraordinary	<input type="text"/>					
Ordinary	<input type="text"/>					
N/A	x	(mark with x)				
Notes	The Respondent does not meet the good faith criteria for this violation.					
		Violation Subtotal		\$400		
Economic Benefit (EB) for this violation			Statutory Limit Test			
Estimated EB Amount		\$335		Violation Final Penalty Total		\$1,191
This violation Final Assessed Penalty (adjusted for limits)						\$1,191

Economic Benefit Worksheet

Respondent: Guss Lines dba Lines Cactus Grove Mobile Home Park
Case ID No.: 36215
Reg. Ent. Reference No.: RN104103247
Media: Public Water Supply
Violation No.: 1

Percent Interest	Years of Depreciation
5.0	15

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

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

Avoided Costs

ANNUALIZE [1] 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	\$280	1-Jul-2004	1-Jul-2007	3.92	\$55	\$280	\$335
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

The avoided costs include the amount to provide a copy of the CCR to the customers of the water system and to the TCEQ, calculated for the years in which no CCR was provided.

Approx. Cost of Compliance

\$280

TOTAL

\$335

COMPLIANCE HISTORY

Customer/Respondent Owner-Operator:	CN602540684	LINES, GUSS	Classification:	Rating:
Regulated Entity:	RN104103247	LINES CACTUS GROVE MHP	Classification:	Site Rating:
ID Number(s):	PUBLIC WATER SYSTEM/SUPPLY REGISTRATION		0220038	
Location:	2408 W HIGHWAY 90, ALPINE, BREWSTER COUNTY, TX, 79830			
TCEQ Region:	REGION 06 - EL PASO			
Date Compliance History Prepared:	June 23, 2008			
Agency Decision Requiring Compliance History:	Enforcement			
Compliance Period:	June 23, 2003 to June 23, 2008			

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History:
 Name: Rebecca Clausewitz Phone: (210) 403-4012

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 judgments, 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.)

1	01/30/2004	(259828)
2	10/03/2005	(439884)
3	10/24/2005	(439780)
4	10/31/2005	(439886)
5	11/30/2005	(438242)
6	12/01/2005	(439894)
7	12/15/2005	(439936)

8	02/15/2007	(644102)
9	04/15/2007	(644354)
10	05/01/2007	(644512)
11	05/15/2007	(644607)
12	07/01/2007	(645004)
13	07/15/2007	(645186)
14	08/01/2007	(645381)
15	08/15/2007	(645547)
16	10/01/2007	(645833)
17	11/01/2007	(646021)
18	04/25/2008	(681084)
19	05/20/2008	(671316)
20	06/02/2008	(681230)

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

Date: 01/30/2004 (259828)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(3)(C)(i)
 30 TAC Chapter 290, SubChapter F 290.110(d)(3)(C)(iii)
 30 TAC Chapter 290, SubChapter F 290.110(d)(4)(C)(i)
 30 TAC Chapter 290, SubChapter F 290.110(d)(4)(C)(ii)

Description: Failure to possess a chlorine test kit which uses the DPD method to determine the free chlorine residual at various locations to ensure the proper chlorine residual is being maintained throughout the distribution system.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(e)(3)(A)

Description: Failure to provide mechanical chlorination equipment to provide continuous disinfection of all water, as per agency's requirements.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(i)

Description: Failure to maintain a service agreement between the regulated entity and each water customer.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(e)

Description: Failure to be under the direct supervision of a certified water works operator at all times. A valid certificate of competency issued under the direction of the Texas Commission on Environmental Quality is required.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(1)(F)

Description: Failure to make available sanitary control easements for wells #1 and 2, at the time of inspection.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(J)

30 TAC Chapter 290, SubChapter D 290.41(c)(4)(D)

30 TAC Chapter 290, SubChapter D 290.41(d)(3)(C)

Description: Failure to provide each well with a concrete sealing block extending at least 3 feet from the exterior well casing in all directions.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(B)

30 TAC Chapter 290, SubChapter D 290.41(c)(4)(A)

30 TAC Chapter 290, SubChapter D 290.41(d)(3)

Description: Failure to provide a well casing 18 inches above the elevation of the finished floor of the pump house or natural ground surface with a minimum of one inch above the sealing block or pump motor foundation block.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K)

30 TAC Chapter 290, SubChapter D 290.41(c)(4)(B)
30 TAC Chapter 290, SubChapter D 290.41(c)(4)(E)
30 TAC Chapter 290, SubChapter D 290.41(d)(3)

Description: At well #1, failure to seal the wellhead with the use of gaskets or a pliable crack-resistant caulking compound.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K)
30 TAC Chapter 290, SubChapter D 290.41(c)(4)(B)
30 TAC Chapter 290, SubChapter D 290.41(d)(3)(F)

Description: Failure to provide each well with a screened casing vent.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(v)

Description: Failure to install all water system electrical wiring in a securely mounted conduit in compliance with a local or national electrical code.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(M)
30 TAC Chapter 290, SubChapter D 290.41(c)(4)(D)
30 TAC Chapter 290, SubChapter D 290.41(d)(4)

Description: Failure to provide a suitable sampling tap on each well discharge to facilitate the collection of samples for chemical and bacteriological analysis directly from the well.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(N)
30 TAC Chapter 290, SubChapter D 290.41(c)(4)(D)
30 TAC Chapter 290, SubChapter D 290.41(d)(4)

Description: Failure to install a flow meter on each well pump discharge line to provide water usage records and to assist in more efficient system operation.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.38(25)
30 TAC Chapter 290, SubChapter D 290.41(c)(3)(O)
30 TAC Chapter 290, SubChapter D 290.41(d)(4)

Description: Failure to protect the well #2 with an intruder-resistant fence or a locked, ventilated well house to exclude possible contamination or damage to the facilities by trespassers.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(1)
30 TAC Chapter 290, SubChapter F 290.121

Description: Failure to develop a public water system monitoring plan.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(iii)

Description: Failure to submit at least 1 sample of water collected from different locations in the distribution system regularly each month to a Texas Department of Health Laboratory for bacteriological analysis as required by this agency's Drinking Water Standards.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(2)

Description: Failure to prepare and maintain a map of the distribution system so that valves and mains may be easily located during emergencies.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)

Description: Failure to post a legible sign at each of its production, treatment, and storage facilities by each community system.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(A)

30 TAC Chapter 290, SubChapter D 290.46(n)(3)

Description: Failure to submit well completion data on wells #1 and 2 for our review and approval.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)
30 TAC Chapter 290, SubChapter D 290.46(f)(3)(D)(ii)
30 TAC Chapter 290, SubChapter D 290.46(m)(1)

Description: Failure to inspect the pressure tanks.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.45(b)(1)(A)(ii)
30 TAC Chapter 290, SubChapter D 290.45(b)(1)(B)(iv)
30 TAC Chapter 290, SubChapter D 290.45(b)(1)(C)(iv)
30 TAC Chapter 290, SubChapter D 290.45(b)(1)(D)(iv)
30 TAC Chapter 290, SubChapter D 290.45(b)(1)(E)(ii)
30 TAC Chapter 290, SubChapter D 290.45(b)(1)(F)(iv)
30 TAC Chapter 290, SubChapter D 290.45(b)(2)(G)
30 TAC Chapter 290, SubChapter D 290.45(c)(1)(A)(ii)
30 TAC Chapter 290, SubChapter D 290.45(c)(1)(B)(iv)
30 TAC Chapter 290, SubChapter D 290.45(c)(2)(F)
30 TAC Chapter 290, SubChapter D 290.45(d)(1)
30 TAC Chapter 290, SubChapter D 290.45(d)(2)(A)(ii)
30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
30 TAC Chapter 290, SubChapter D 290.45(d)(3)(F)
30 TAC Chapter 290, SubChapter D 290.45(e)(3)
30 TAC Chapter 290, SubChapter D 290.45(f)(6)
30 TAC Chapter 290, SubChapter D 290.45(g)(2)

Description: Failure to meet this Agency's "Minimum Water System Capacity Requirements." These requirements include a pressure tank capacity of 50 gallons per connection.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.39(e)(1)(A)
30 TAC Chapter 290, SubChapter D 290.39(e)(1)(B)
30 TAC Chapter 290, SubChapter D 290.39(e)(1)(C)
30 TAC Chapter 290, SubChapter D 290.39(e)(1)(D)
30 TAC Chapter 290, SubChapter D 290.39(e)(1)(E)
30 TAC Chapter 290, SubChapter D 290.39(e)(1)(F)
30 TAC Chapter 290, SubChapter D 290.39(e)(1)(G)
30 TAC Chapter 290, SubChapter D 290.39(e)(1)(H)

Description: Failure to secure the services of a registered professional engineer well versed in the design and construction of public water systems so that "as-built" plans and specifications of your water system can be prepared and submitted for our review.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(4)
Description: Failure to maintain all distribution system lines and related appurtenances in a watertight condition.

Date: 10/03/2005 (439884)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)

Description: Failure to collect and submit monthly water samples for bacteriological analysis in 08/2005.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)

Description: Failure to provide public notification for the failure to collect water samples in 08/2005.

Date: 10/24/2005 (439780)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 07/2005.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 07/2005.

Date: 10/31/2005 (439886)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 09/2005.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 09/2005.

Date: 12/01/2005 (439894)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 10/2005.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 10/2005.

Date: 12/21/2005 (686238)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 11/2005.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 11/2005.

Date: 05/26/2006 (686246)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 04/2006.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 04/2006.

Date: 06/27/2006 (686298)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 05/2006.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 05/2006.

Date: 07/31/2006 (686319)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 06/2006.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 06/2006.

Date: 09/25/2006 (686321)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 08/2006.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 08/2006.

Date: 12/21/2006 (686354)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 11/2006.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 11/2006.

Date: 01/26/2007 (686356)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 12/2006.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 12/2006.

Date: 04/25/2007
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 03/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 03/2007.

Date: 05/25/2007
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 04/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 04/2007.

Date: 07/30/2007
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 06/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 06/2007.

Date: 09/10/2007
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 07/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 07/2007.

Date: 11/01/2007
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 08/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 08/2007.

Date: 12/20/2007 (686373)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 09/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 09/2007.

Date: 02/14/2008 (686376)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 11/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 11/2007.

Date: 02/21/2008 (686379)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 12/2007.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 12/2007.

Date: 03/11/2008
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 01/2008.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 01/2008.

Date: 04/29/2008 (686383)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 03/2008.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 03/2008.

Date: 05/22/2008
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
5A THC Chapter 341, SubChapter A 341.033(d)
Description: Failure to collect and submit monthly water samples for bacteriological analysis in 04/2008.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: Failure to provide public notification for the failure to collect water samples in 04/2008.

Date: 05/16/2008 (671316)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(e)
Description: Failure to be under the direct supervision of a certified water works operator at all times. A valid certificate of competency issued under the direction of the Texas Commission on Environmental Quality is required.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K)
30 TAC Chapter 290, SubChapter D 290.41(c)(4)(B)
30 TAC Chapter 290, SubChapter D 290.41(d)(3)(F)
Description: Failure to provide each well with a screened casing vent.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.46(v)
Description: Failure to install all water system electrical wiring in a securely mounted conduit in compliance with a local or national electrical code.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(N)
30 TAC Chapter 290, SubChapter D 290.41(c)(4)(D)
30 TAC Chapter 290, SubChapter D 290.41(d)(4)
Description: Failure to install a flow meter on each well pump discharge line to provide water usage records and to assist in more efficient system operation.

Self Report? NO Classification: Major
Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(A)
Description: Failure to maintain the required disinfection residual when disinfection equipment is available.

Self Report? NO Classification: Major
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(J)
Description: Failure to provide well numbers one and two with a concrete sealing block extending at least three feet from the well casing in all directions.

Self Report? NO Classification: Major
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(M)
Description: Failure to provide a suitable sampling tap on each well discharge.

Self Report? NO Classification: Major
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(O)
Description: Failure to protect all water wells in a lockable building or enclosed by an intruder-resistant fence with lockable gates.

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

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
GUSS LINES DBA LINES CACTUS
GROVE MOBILE HOME PARK,
RN104103247**

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§
§
§
§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

**AGREED ORDER
DOCKET NO. 2008-1164-PWS-E**

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Guss Lines dba Lines Cactus Grove Mobile Home Park ("Mr. Lines") under the authority of TEX. HEALTH & SAFETY CODE ch. 341 and 30 TEX. ADMIN. CODE chs. 70 and 290. The Executive Director of the TCEQ, represented by the Litigation Division, and Mr. Lines, appear before the Commission and together stipulate that:

1. Mr. Lines owns and operates a public water system located at 2408 West Highway 90, Alpine, Brewster County, Texas (the "Facility"), that has 40 service connections and serves at least 25 people per day for at least 60 days per year.
2. This Agreed Order is entered into pursuant to TEX. HEALTH & SAFETY CODE § 341.049. The Commission has jurisdiction of this matter pursuant to TEX. HEALTH & SAFETY CODE § 341.031 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 341 and TCEQ rules.
3. The Commission and Mr. Lines agree that the Commission has jurisdiction to enter this Agreed Order, and that Mr. Lines is subject to the Commission's jurisdiction.
4. Mr. Lines received notice of the violations alleged in Section II ("Allegations") on or about June 3, 2008.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Mr. Lines of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative penalty in the amount of one thousand one hundred ninety-one dollars (\$1,191.00) is assessed by the Commission in settlement of the violation alleged in Section II ("Allegations"). Mr. Lines has paid one thousand one hundred ninety-one dollars (\$1,191.00) of the administrative penalty.
7. 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.
8. The Executive Director of the TCEQ and Mr. Lines have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
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 Mr. Lines 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

Mr. Lines, as owner and operator of the Facility, is alleged to have violated 30 TEX. ADMIN. CODE §§ 290.271(b), 290.274(a), and 290.274(c), by failing to mail or directly deliver one copy of the Consumer Confidence Report ("CCR") to each bill paying customer by July 1 of each year and by failing to submit a copy of the annual CCR and certification that the CCR has been distributed to the customers of the water system and that the information in the CCR is correct and consistent with compliance monitoring data to the TCEQ by July 1 of each year. Specifically, Mr. Lines did not mail or directly deliver the CCRs to the water system's customers for the years 2003 through 2006, nor did Mr. Lines submit the CCRs or the required certification to the TCEQ for the years 2003 through 2006.

III. DENIALS

Mr. Lines generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Mr. Lines pay administrative penalties as set forth in Section I, Paragraph 6 above. The payment of these administrative penalties and Mr. Lines' compliance with all the terms and conditions set forth in this Agreed Order resolve only those matters described here. 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 sent with the notation "Re: Guss Lines Cactus Grove Mobile Home Park; Docket No. 2008-1164-PWS-E; Enforcement ID No. 36215" to:

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

2. Mr. Lines shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order, Mr. Lines shall:
 - i. Mail or directly deliver a copy of the 2007 CCR to all bill paying customers of the water system and make a good faith effort to deliver a copy of the 2007 CCR to all non-bill paying consumers of the water system, as required by 30 TEX. ADMIN. CODE §§ 290.271 and 290.274; and
 - ii. Submit to the Commission a copy of the 2007 CCR provided to customers of the water system and the certification that the CCR has been distributed to the customers of the water system and that the information in the CCR is correct and consistent with the compliance monitoring data, as required by 30 TEX. ADMIN. CODE § 290.274. The copy of the CCR and the certification shall be mailed to:

Public Drinking Water Section, MC 155
Water Supply Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

- b. Within 45 days after the effective date of this Agreed Order, Mr. Lines shall submit written certification as described below, and include detailed supporting documentation including photocopies, receipts, and/or other records to demonstrate

compliance with Ordering Provision No. 2.a. The certification shall be notarized by a State of Texas Notary Public and 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 fine and imprisonment for knowing violations.”

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

3. The provisions of this Agreed Order shall apply to and be binding upon Mr. Lines. Mr. Lines 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.
4. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Mr. Lines shall be made in writing to the Executive Director. Extensions are not effective until Mr. Lines receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
5. This Agreed Order, issued by the Commission, shall not be admissible against Mr. Lines 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 the TEX. WATER CODE or the TEX. HEALTH & SAFETY CODE.
6. 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.

Guss Lines dba Lines Cactus Grove Mobile Home Park

DOCKET NO. 2008-1164-PWS-E

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7. Under 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142, the effective date of this Agreed Order is the date of hand-delivery of the Order to Mr. Lines, or three days after the date on which the Commission mails notice of the Order to Mr. Lines, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

[Signature]
For the Executive Director

2/2/2009
Date

I, the undersigned, have read and understand the attached Agreed Order. I represent that 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.

Guss Lines
Signature

11/19/08
Date

GUSS LINES
Name (Printed or typed)
Authorized representative of
Guss Lines dba Lines Cactus Grove Mobile Home Park

President
Title