

EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 3
DOCKET NO.: 2008-0589-MWD-E **TCEQ ID:** RN101917136 **CASE NO.:** 35693
RESPONDENT NAME: City of Crandall

ORDER TYPE:		
<input type="checkbox"/> 1660 AGREED ORDER	<input checked="" 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 AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input checked="" 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
<p>SITE WHERE VIOLATION(S) OCCURRED: City of Crandall WWTP, located approximately 2,000 feet southwest of the intersection of Buffalo Creek and Farm-to-Market Road 148, Crandall, Kaufman County</p> <p>TYPE OF OPERATION: Wastewater treatment plant</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There was one complaint received on November 7, 2007, alleging that the Plant was not being operated properly. There is no record of additional pending enforcement actions regarding this facility location.</p> <p>INTERESTED PARTIES: A complaint was received, but the complainant has not expressed a desire to protest this action or to speak at Agenda.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on April 20, 2009. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Mr. Thomas Jecha, Enforcement Division, Enforcement Team 3, MC 149, (512) 239-2576; Ms. Cari-Michel La Caille, Enforcement Division, MC 219, (512) 239-1387 Respondent: Mr. Heath Kaplan, City Manager, City of Crandall, 110 South Main Street, Crandall, Texas 75114 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Routine <input checked="" type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: November 7, 2007</p> <p>Date of Investigation Relating to this Case: January 16, 2008 and February 22, 2008</p> <p>Date of NOV/NOE Relating to this Case: March 14, 2008 (NOE)</p> <p>Background Facts: This was a complaint investigation.</p> <p>WATER</p> <p>1) Failure to employ or contract with one or more licensed wastewater treatment facility operators or wastewater system operations companies holding a valid license or registration [30 TEX. ADMIN. CODE §§ 30.350(d) and 305.125(1) and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010834001, Other Requirements No. 1].</p> <p>2) Failure to submit the annual sludge reports [30 TEX. ADMIN. CODE § 305.125(17) and TPDES Permit No. WQ0010834001, Sludge Provisions].</p> <p>3) Failure to properly operate and maintain all facilities and systems of treatment and control [30 TEX. ADMIN. CODE §§ 305.125(5) and 317.4(d) and TPDES Permit No. WQ0010834001, Operational Requirements No. 1].</p> <p>4) Failure to comply with the permitted interim effluent limitations for ammonia nitrogen, dissolved oxygen, flow, fecal coliform bacteria, total suspended solids, carbonaceous biochemical oxygen demand, and pH and certify compliance with the effluent limits of TPDES Permit NO. WQ0010834001 [TEX. WATER CODE § 26.121(a), 30 TEX. ADMIN. CODE § 305.125(1), TPDES Permit No. WQ0010834001, Effluent Limitations and Monitoring Requirements No. 1 and 6; and</p>	<p>Total Assessed: \$63,616</p> <p>Total Deferred: \$63,616 <input type="checkbox"/> Expedited Settlement <input checked="" type="checkbox"/> Financial Inability to Pay</p> <p>The Financial Assurance Section of the Commission's Financial Administration Division reviewed financial documentation submitted by the Respondent and determined that the Respondent is unable to pay the administrative penalty.</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid (Due) to General Revenue: \$0</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p> <p>Findings Orders Justification: This is a Findings Order because the case involves a violation of a prior Agreed Order. When the Respondent failed to comply with the prior Agreed Order, the Respondent demonstrated an indifference to legal duty.</p>	<p>Corrective Actions Taken:</p> <p>The Executive Director recognizes that the Respondent hired a certified wastewater treatment plant operator after the violation was documented during the January 16, 2008 investigation and prior to a follow-up investigation conducted on February 22, 2008.</p> <p>Ordering Provisions:</p> <p>The Order will require the Respondent to:</p> <p>a) Within 30 days after the effective date of this Agreed Order:</p> <p>i) Update the Facility's operational guidance and conduct employee training to ensure that:</p> <p>1) Noncompliance notifications are timely submitted to the TCEQ Dallas/Fort Worth Regional Office for all collection system overflows and effluent violations that deviate from the permit limit by more than 40 percent; and</p> <p>2) All DMRs are submitted by the 20th day of the following month;</p> <p>ii) Submit the annual sludge reports for the monitoring periods ending July 31, 2006 and 2007;</p> <p>iii) Begin maintaining all required records and have them readily available upon request for review by the TCEQ;</p> <p>iv) Submit revised DMRs for February, September, and October 2007 with values for fecal coliform, TSS, CBOD, and Ammonia Nitrogen daily average loading that are correctly calculated and properly indicate the correct number of exceedances for all parameters; and</p> <p>v) Submit the delinquent May 2006 DMR.;</p> <p>b) Within 60 days after the effective date of this Agreed Order:</p> <p>i) Adjust the flow over the clarifier weir so it is uniform on all sides;</p>

<p>Agreed Order Docket No. 2005-0837-MWD-E, Ordering Provision No. 3.b].</p> <p>5) Failure to submit noncompliance notification reports for effluent violations which deviate from the permitted effluent limitation by more than 40% [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirement No. 7.c].</p> <p>6) Failure to have all the required monitoring and reporting records available for review upon request [30 TEX. ADMIN. CODE §§ 305.125(1) and (11)(B) and 319.7(c) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 3.b].</p> <p>7) Failure to accurately complete monthly effluent reports [30 TEX. ADMIN. CODE §§ 305.125(1), 319.1, and 319.7(a)(5) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 2].</p> <p>8) Failure to submit monitoring results at the intervals specified in the permit [30 TEX. ADMIN. CODE § 305.125(17) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 1].</p> <p>9) Failure to prevent the unauthorized discharge of wastewater from the sanitary sewer collection system and floating solids from the facility [TEX. WATER CODE § 26.121(a), 30 TEX. ADMIN. CODE § 305.125(1) and (4), and TPDES Permit No. WQ0010834001, Effluent Limitations and Monitoring Requirements No. 4 and Permit Conditions No. 2.g].</p> <p>10) Failure to notify the TCEQ of noncompliances which may endanger human health or safety, or the environment [30 TEX. ADMIN. CODE § 305.125(9) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 7.a].</p> <p>11) Failure to timely submit monthly effluent reports by the 20th day of the following month [30 TEX. ADMIN. CODE §§ 305.125(1), 319.1, and 319.7(d) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 1].</p>		<p>ii) Identify and eliminate the cause of the collection system overflow that occurred near 120 Willow Lake Lane on August 5, 2007;</p> <p>iii) Eliminate discharges of floating solids from the outfall to the receiving stream that exceed trace amounts;</p> <p>iv) Remove any floating solids that were discharged from the Facility outfall and remain in the receiving stream;</p> <p>v) Submit written certification of compliance with the effluent limits of TPDES Permit No. WQ0010834001, including specific corrective actions that were implemented at the facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations; and</p> <p>c) Within 75 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provisions a. through b.iv.</p>
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TCEQ

DATES	Assigned	17-Mar-2008	Screening	8-Apr-2008	EPA Due	
	PCW	10-Apr-2008				

RESPONDENT/FACILITY INFORMATION	
Respondent	City of Crandall
Reg. Ent. Ref. No.	RN101917136
Facility/Site Region	4-Dallas/Fort Worth
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	35693	No. of Violations	11
Docket No.	2008-0589-MWD-E	Order Type	Findings
Media Program(s)	Water Quality	Enf. Coordinator	Thomas Jecha
Multi-Media		EC's Team	Enforcement Team 3
Admin. Penalty \$	Limit Minimum \$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$31,300
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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	200% Enhancement	Subtotals 2, 3, & 7
		\$62,600

Notes: Enhancement for 33 NOVs with self-reported effluent data, three NOVs with same or similar violations, and one agreed order with a denial of liability at this facility within the past five years.

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

Good Faith Effort to Comply	0% Reduction	Subtotal 5	\$0
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	(mark with x)

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

	0% Enhancement*	Subtotal 6	\$0
Total EB Amounts	\$7,934	*Capped at the Total EB \$ Amount	
Approx. Cost of Compliance	\$46,850		

SUM OF SUBTOTALS 1-7	Final Subtotal	\$93,900
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OTHER FACTORS AS JUSTICE MAY REQUIRE	-32%	Adjustment	-\$30,284
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: Recommended reduction to prevent double-enhancement of the penalty amount for same violations not self-reported and so that self-reported effluent violations and noncompliance notification violations do not overly impact the penalty amount.

Final Penalty Amount	\$63,616
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$63,616
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DEFERRAL	0% Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$63,616
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Screening Date 8-Apr-2008

Docket No. 2008-0589-MWD-E

PCW

Respondent City of Crandall

Policy Revision 2 (September 2002)

Case ID No. 35693

PCW Revision February 29, 2008

Reg. Ent. Reference No. RN101917136

Media [Statute] Water Quality

Enf. Coordinator Thomas Jecha

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)	36	180%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
	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) 200%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for 33 NOVs with self-reported effluent data, three NOVs with same or similar violations, and one agreed order with a denial of liability at this facility within the past five years.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 200%

Screening Date 8-Apr-2008

Docket No. 2008-0589-MWD-E

PCW

Respondent City of Crandall

Policy Revision 2 (September 2002)

Case ID No. 35693

PCW Revision February 29, 2008

Reg. Ent. Reference No. RN101917136

Media [Statute] Water Quality

Enf. Coordinator Thomas Jecha

Violation Number

Rule Cite(s) 30 Tex. Admin. Code §§ 30.350(d) and 305.125(1) and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010834001, Other Requirements No. 1

Violation Description

Failed to employ or contract with one or more licensed wastewater treatment facility operators or wastewater system operations companies holding a valid license or registration. Specifically, none of the employees operating the wastewater treatment plant were licensed operators.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR

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

Percent

>> Programmatic Matrix

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

Percent

Matrix Notes

Human health or the environment could be exposed to significant amounts of pollutants which would exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment

Violation Events

Number of Violation Events

Number of violation days

mark only one with an x

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

Violation Base Penalty

Two monthly events are recommended from the January 16, 2008 investigation until compliance was verified during a February 22, 2008 follow-up investigation.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent: City of Crandall
Case ID No.: 35693
Reg. Ent. Reference No.: RN101917136
Media: Water Quality
Violation No.: 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	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

The estimated cost associated with this violation is included in the economic benefit estimated for violation No. 4.

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

\$0

TOTAL

\$0

Screening Date 8-Apr-2008	Docket No. 2008-0589-MWD-E	PCW
Respondent City of Crandall		<small>Policy Revision 2 (September 2002)</small>
Case ID No. 35693		<small>PCW Revision February 29, 2008</small>
Reg. Ent. Reference No. RN101917136		
Media [Statute] Water Quality		
Enf. Coordinator Thomas Jecha		
Violation Number 2		
Rule Cite(s)	30 Tex. Admin. Code § 305.125(17) and TPDES Permit No. WQ0010834001, Sludge Provisions	
Violation Description	Failed to submit the annual sludge reports for the monitoring periods ending July 31, 2006 and 2007.	
	Base Penalty	\$10,000

>> 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 <input type="text" value="0%"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="10%"/>

Matrix Notes 100% of the rule requirement was not met.

Adjustment

Violation Events

Number of Violation Events Number of violation days

mark only one with an 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="text" value="x"/>

Violation Base Penalty

Two single events are recommended (one event per report).

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent: City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media: Water Quality
Violation No.: 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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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	1-Sep-2006	6-Nov-2008	2.2	\$66	n/a	\$66
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 prepare and submit two annual sludge reports. Date required is the date the reporting requirement started. Final date is the expected 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

\$66

Screening Date 8-Apr-2008 **Docket No.** 2008-0589-MWD-E **PCW**
Respondent City of Crandall *Policy Revision 2 (September 2002)*
Case ID No. 35693 *PCW Revision February 29, 2008*
Reg. Ent. Reference No. RN101917136
Media [Statute] Water Quality
Enf. Coordinator Thomas Jecha

Violation Number
Rule Cite(s) 30 Tex. Admin. Code §§ 305.125(5) and 317.4(d) and TPDES Permit No. WQ0010834001, Operational Requirements No. 1

Violation Description Failed to properly operate and maintain all facilities and systems of treatment and control. Specifically, flow over the weir of the east clarifier was extremely uneven and a large amount of floating solids were observed in the clarifier.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="5%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input checked="" type="text" value="x"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0%"/>

Matrix Notes Human health or the environment could be exposed to insignificant amounts of pollutants as a result of the violation.

Adjustment

Violation Events

Number of Violation Events **Number of violation days**

mark only one with an 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="text" value="x"/>

Violation Base Penalty

One single event is recommended.

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media Water Quality
Violation No. 3

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

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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)	\$100	16-Jan-2008	11-Nov-2008	0.8	\$4	n/a	\$4

Notes for DELAYED costs

Estimated cost to adjust the east clarifier weir for even flow. The date required is the investigation date and the final date is the expected date of compliance.

Avoided Costs

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

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

\$100

TOTAL

\$4

Screening Date 8-Apr-2008

Docket No. 2008-0589-MWD-E

PCW

Respondent City of Crandall

Policy Revision 2 (September 2002)

Case ID No. 35693

PCW Revision February 29, 2008

Reg. Ent. Reference No. RN101917136

Media [Statute] Water Quality

Enf. Coordinator Thomas Jecha

Violation Number

Rule Cite(s) Tex. Water Code § 26.121(a), 30 Tex. Admin. Code § 305.125(1), TPDES Permit No. WQ0010834001, Effluent Limitations and Monitoring Requirements No. 1 and 6; and Agreed Order Docket No. 2005-0837-MWD-E, Ordering Provision No. 3.b.

Violation Description Failed to comply with the permitted interim effluent limitations as shown in the attached table. The Agreed Order, Docket No. 2005-0837-MWD-E, Ordering Provision No. 3.b., requires the Respondent to certify compliance with the effluent limits of TPDES Permit No. WQ0010834001.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text" value="10%"/>
	Potential	<input type="text"/>	<input type="text"/>	<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" value="0%"/>

Matrix Notes

A simplified model was used to determine whether the discharged amounts of pollutants exceeded levels protective of human health or the environment. As a result of this violation, human health or the environment has been exposed to insignificant amounts of pollutants which did not exceed protective levels.

Adjustment

Violation Events

Number of Violation Events **Number of violation days**

<i>mark only one with an x</i>	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input checked="" type="text" value="x"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input type="text"/>

Violation Base Penalty

Eight quarterly events are recommended from the effective date of Agreed Order Docket No. 2005-0837-MWD-E (April 29, 2006) through the April 8, 2008 screening date.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media Water Quality
Violation No. 4

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	\$40,000	1-May-2006	30-Nov-2008	2.6	\$345	\$6,897	\$7,242
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$3,000	30-Jun-2006	30-Nov-2008	2.4	\$363	n/a	\$363
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 costs of evaluating the causes of the effluent noncompliances is \$5,000 and implementing necessary rehabilitation work is \$35,000. Estimated costs of additional operator training and process control testing. Date required is first date of noncompliance and final date is the date the expected 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

\$43,000

TOTAL

\$7,605

Screening Date 8-Apr-2008	Docket No. 2008-0589-MWD-E	PCW
Respondent City of Crandall		<i>Policy Revision 2 (September 2002)</i>
Case ID No. 35693		<i>PCW Revision February 29, 2008</i>
Reg. Ent. Reference No. RN101917136		
Media [Statute] Water Quality		
Enf. Coordinator Thomas Jecha		
Violation Number	5	
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirement No. 7.c.	
Violation Description	Failed to submit noncompliance notification reports for effluent violations which deviate from the permitted effluent limitation by more than 40%. Specifically, noncompliance notification reports were not submitted for exceeding carbonaceous biochemical oxygen demand ("CBOD"), total suspended solids ("TSS"), ammonia nitrogen, fecal coliform bacteria, dissolved oxygen, pH, or flow parameter limitations by more than 40% during the months of January through and including November 2007.	
	Base Penalty	\$10,000

>> Environmental, Property and Human Health Matrix

OR	Harm				
		Major	Moderate	Minor	
	Release				
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="0%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent <input type="text" value="10%"/>
	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text"/>	

Matrix Notes 100% of the rule requirement was not met.

Adjustment

Violation Events

Number of Violation Events Number of violation days

<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	<input type="text"/>
	single event	<input checked="" type="text" value="x"/>

Violation Base Penalty

Eleven single events are recommended (one for each report).

Economic Benefit (EB) for this violation Statutory Limit Test

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media Water Quality
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
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	\$1,200	20-Feb-2007	6-Nov-2008	1.7	\$103	n/a	\$103
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 submit the required notifications, at \$100 per notification, and develop and implement procedures to ensure effluent limit exceedances of 40 percent or more are reported from the date the January 2007 report was due until the expected 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

\$1,200

TOTAL

\$103

Screening Date 8-Apr-2008	Docket No. 2008-0589-MWD-E	PCW
Respondent City of Crandall		<small>Policy Revision 2 (September 2002)</small>
Case ID No. 35693		<small>PCW Revision February 29, 2008</small>
Reg. Ent. Reference No. RN101917136		
Media [Statute] Water Quality		
Enf. Coordinator Thomas Jecha		
Violation Number 6		
Rule Cite(s)	30 Tex. Admin. Code §§ 305.125(1) and (11)(B) and 319.7(c) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 3.b.	
Violation Description	Failed to have all the required monitoring and reporting records available for review upon request. Specifically, temperature records for calibration of the pH meter; barometric pressure records for calibration of the dissolved oxygen meter; annual calibration of the flow measuring device for 2007; and quality assurance records for fecal coliform bacteria analysis, were not available during the investigation conducted on January 16, 2008.	
	Base Penalty	\$10,000

>> 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 <input type="text" value="0%"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="x"/>
				Percent <input type="text" value="1%"/>

Matrix Notes Less than 30% of the rule requirement was not met.

Adjustment

Violation Events

Number of Violation Events Number of violation days

<small>mark only one with an x</small>	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input type="text" value="x"/>

Violation Base Penalty

One single event is recommended.

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media Water Quality
Violation No. 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost <small>No commas or \$</small>	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	\$200	16-Jan-2008	6-Nov-2008	0.8	\$8	n/a	\$8
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 costs of making the required records available for review. Date required is the investigation date. Final date is the projected 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

\$8

Screening Date 8-Apr-2008	Docket No. 2008-0589-MWD-E	PCW
Respondent City of Crandall		<small>Policy Revision 2 (September 2002)</small>
Case ID No. 35693		<small>PCW Revision February 29, 2008</small>
Reg. Ent. Reference No. RN101917136		
Media [Statute] Water Quality		
Enf. Coordinator Thomas Jecha		
Violation Number 7		
Rule Cite(s)	30 Tex. Admin. Code §§ 305.125(1), 319.1, and 319.7(a)(5) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 2	
Violation Description	Failed to accurately complete monthly effluent reports. Specifically, discharge monitoring reports ("DMR") for February, September, and October 2007 contain values for fecal coliform, TSS, CBOD, and Ammonia Nitrogen daily average loading that were not correctly calculated and the number of exceedences for all parameters was not correctly documented.	
	Base Penalty	\$10,000

>> 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 <input type="text" value="0%"/>	

>> Programmatic Matrix

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

Matrix Notes At least 70% of the rule requirement was met.

Adjustment

Violation Events

	<input type="text" value="3"/>		<input type="text" value="89"/>	Number of violation days												
<small>mark only one with an x</small>	<table style="width:100%; border-collapse: collapse;"> <tr><td style="width:100px;">daily</td><td><input type="text"/></td></tr> <tr><td>monthly</td><td><input type="text"/></td></tr> <tr><td>quarterly</td><td><input type="text"/></td></tr> <tr><td>semiannual</td><td><input type="text"/></td></tr> <tr><td>annual</td><td><input type="text"/></td></tr> <tr><td>single event</td><td><input type="text" value="x"/></td></tr> </table>	daily	<input type="text"/>	monthly	<input type="text"/>	quarterly	<input type="text"/>	semiannual	<input type="text"/>	annual	<input type="text"/>	single event	<input type="text" value="x"/>		Violation Base Penalty	<input type="text" value="\$300"/>
daily	<input type="text"/>															
monthly	<input type="text"/>															
quarterly	<input type="text"/>															
semiannual	<input type="text"/>															
annual	<input type="text"/>															
single event	<input type="text" value="x"/>															

Three single events are recommended (one event per DMR).

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount <input type="text" value="\$12"/>	Violation Final Penalty Total <input type="text" value="\$610"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$610"/>	

Economic Benefit Worksheet

Respondent: City of Crandall
Case ID No.: 35693
Reg. Ent. Reference No.: RN101917136
Media: Water Quality
Violation No.: 7

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				0.0	\$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	\$150	20-Mar-2007	6-Nov-2008	1.6	\$12	n/a	\$12
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 correct and resubmit three DMRs at \$50 per DMR. The date required is the date the February 2007 DMR was due and the final date is the expected 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

\$150

TOTAL

\$12

Screening Date 8-Apr-2008	Docket No. 2008-0589-MWD-E	PCW
Respondent City of Crandall	<small>Policy Revision 2 (September 2002)</small>	
Case ID No. 35693	<small>PCW Revision February 29, 2008</small>	
Reg. Ent. Reference No. RN101917136		
Media [Statute] Water Quality		
Enf. Coordinator Thomas Jecha		
Violation Number <input type="text" value="8"/>		
Rule Cite(s)	30 Tex. Admin. Code § 305.125(17) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 1	
Violation Description	Failed to submit monitoring results at the intervals specified in the permit. Specifically, a monthly DMR was not submitted for May 2006.	
Base Penalty		<input type="text" value="\$10,000"/>

>> Environmental, Property and Human Health Matrix

OR	Harm				
	Release	Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="0%"/>
Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>		
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
	<input type="text"/>	x	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="10%"/>
Matrix Notes	100% of the rule requirement was not met.				
Adjustment					<input type="text" value="\$9,000"/>

Violation Events

	<input type="text" value="1"/>		<input type="text" value="31"/>	Number of violation days
<small>mark only one with an x</small>	daily	<input type="text"/>	monthly	<input type="text"/>
	quarterly	<input type="text"/>	semiannual	<input type="text"/>
	annual	<input type="text"/>	single event	<input type="text" value="x"/>
Violation Base Penalty <input type="text" value="\$1,000"/>				
One single event is recommended.				

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount <input type="text" value="\$12"/>	Violation Final Penalty Total <input type="text" value="\$2,032"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$2,032"/>	

Economic Benefit Worksheet

Respondent City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media Water Quality
Violation No. 8

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	\$100	20-Jun-2006	6-Nov-2008	2.4	\$12	n/a	\$12
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 prepare and submit a monthly DMR. The date required is the date the May 2006 DMR was due and the final date is the expected 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	\$100	TOTAL	\$12
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Screening Date 8-Apr-2008

Docket No. 2008-0589-MWD-E

PCW

Respondent City of Crandall

Policy Revision 2 (September 2002)

Case ID No. 35693

PCW Revision February 29, 2008

Reg. Ent. Reference No. RN101917136

Media [Statute] Water Quality

Enf. Coordinator Thomas Jecha

Violation Number 9

Rule Cite(s) Tex. Water Code § 26.121(a), 30 Tex. Admin. Code § 305.125(1) and (4), and TPDES Permit No. WQ0010834001, Effluent Limitations and Monitoring Requirements No. 4 and Permit Conditions No. 2.g.

Violation Description

Failed to prevent the unauthorized discharge of wastewater from the sanitary sewer collection system and floating solids from the wastewater treatment plant ("WWTP"). Specifically, an unknown amount of untreated sewage was discharged to the ground from a collection system manhole near 120 Willow Lake Lane on August 5, 2007 and floating solids from the WWTP outfall were observed in the receiving stream during an investigation conducted on February 22, 2008.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual			x	10%
Potential				

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
				0%

Matrix Notes

Human health or the environment has been exposed to an insignificant amount of pollutants as a result of the violation.

Adjustment \$9,000

\$1,000

Violation Events

Number of Violation Events 2 Number of violation days 2

mark only one with an x

daily	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$2,000

Two single events are recommended (one event for each discharge).

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$94

Violation Final Penalty Total \$4,065

This violation Final Assessed Penalty (adjusted for limits) \$4,065

Economic Benefit Worksheet

Respondent: City of Crandall
Case ID No.: 35693
Reg. Ent. Reference No.: RN101917136
Media: Water Quality
Violation No.: 9

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				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction	\$1,000	5-Aug-2007	6-Dec-2008	1.3	\$4	\$89	\$94
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 determine the cause and prevent future discharges from the manhole at 120 Willow Lake Lane and to prevent solids from entering the receiving stream from the wastewater treatment plant outfall. The date required is the date of the Willow Lake Lane discharge and the final date is the expected 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

\$1,000

TOTAL

\$94

Screening Date 8-Apr-2008	Docket No. 2008-0589-MWD-E	PCW
Respondent City of Crandall		<small>Policy Revision 2 (September 2002)</small>
Case ID No. 35693		<small>PCW Revision February 29, 2008</small>
Reg. Ent. Reference No. RN101917136		
Media [Statute] Water Quality		
Enf. Coordinator Thomas Jecha		
Violation Number 10		
Rule Cite(s)	30 Tex. Admin. Code § 305.125(9) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 7.a.	
Violation Description	Failed to notify the TCEQ of noncompliances which may endanger human health or safety, or the environment. Specifically, the Respondent did not notify the TCEQ of the unauthorized discharge of sewage from a collection system manhole near 120 Willow Lake Lane on August 5, 2007.	
	Base Penalty	\$10,000

>> Environmental, Property and Human Health Matrix					
OR		Harm			
	Release	Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="0%"/>
Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>		
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="10%"/>
Matrix Notes	100% of the rule requirement was not met.				
	Adjustment				\$9,000

\$1,000

Violation Events					
	Number of Violation Events	<input type="text" value="1"/>	Number of violation days	<input type="text" value="1"/>	
<small>mark only one with an x</small>	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="text" value="x"/>	
	Violation Base Penalty				\$1,000
	One single event is recommended.				

Economic Benefit (EB) for this violation		Statutory Limit Test	
Estimated EB Amount	<input type="text" value="\$6"/>	Violation Final Penalty Total	<input type="text" value="\$2,032"/>
		This violation Final Assessed Penalty (adjusted for limits)	<input type="text" value="\$2,032"/>

Economic Benefit Worksheet

Respondent City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media Water Quality
Violation No. 10

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				0.0	\$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)	\$100	5-Aug-2007	6-Nov-2008	1.3	\$6	n/a	\$6

Notes for DELAYED costs

Estimated cost to notify the TCEQ of the Willow Lake Lane discharge. The date required is the date of the discharge and the final date is the estimated 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

\$100

TOTAL

\$6

Screening Date 8-Apr-2008
Respondent City of Crandall
Case ID No. 35693
Reg. Ent. Reference No. RN101917136
Media [Statute] Water Quality
Enf. Coordinator Thomas Jecha

Docket No. 2008-0589-MWD-E

PCW

Policy Revision 2 (September 2002)
 PCW Revision February 29, 2008

Violation Number 11

Rule Cite(s) 30 Tex. Admin. Code §§ 305.125(1), 319.1, and 319.7(d) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 1

Violation Description Failed to timely submit monthly effluent reports by the 20th day of the following month. Specifically, the DMR for July 2007 was received on January 21, 2008 and DMRs for August, September, and October 2007 were received on December 14, 2007.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				0%
	Potential				

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
			x	1%

Matrix Notes Less than 30% of the rule requirement was not met.

Adjustment \$9,900

\$100

Violation Events

Number of Violation Events 4 **Number of violation days** 155

mark only one with an x

daily	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$400

Four single events are recommended (one event per DMR).

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$24

Violation Final Penalty Total \$813

This violation Final Assessed Penalty (adjusted for limits) \$813

Economic Benefit Worksheet

Respondent: City of Crandall
Case ID No.: 35693
Reg. Ent. Reference No.: RN101917136
Media: Water Quality
Violation No.: 11

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				0.0	\$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	\$400	20-Aug-2007	6-Nov-2008	1.2	\$24	n/a	\$24
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 of preparing and submitting DMRs at \$100 per month. Date required is the date the July 2007 DMR was due and the final date is the expected 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

\$24

Effluent Limit Violation Table

table rev

Respondent: **City of Crandall**

ID Number(s): **TPDES Permit No. WQ0010834001, Enf Id. 35693**

Docket Number: **2008-0589-MWD-E**

Off. Coordinator: **Thomas E. Jecha**

Corresponds to Violation Number: **3**

EFFLUENT PARAMETER
Permit Limit

Month/Year	NH3-N daily avg loading (lbs/day)	NH3-N daily avg conc (mg/l)	NH3-N daily maximum (mg/l)	Dissolved Oxygen minimum (mg/l)	Flow daily average (MGD)	FCB daily avg (colonies/100 ml)	FCB 7 day avg (colonies/100 ml)	TSS daily maximum (mg/l)	TSS daily average loading (lbs/day)	CBOD5 daily average (mg/l)	CBOD5 daily max (mg/l)	pH min (s.u.)	pH max (s.u.)
10	2	10	5	0.6	200	400	40	75	7	22	9	9	
6/30/2006	c	2.3	198	c	c	c	c	c	c	c	c	c	
7/31/2006	c	c	c	c	c	c	c	c	c	31.3	c	c	
8/31/2006	c	c	c	c	39.9	c	c	c	c	c	24	c	
9/30/2006	c	c	c	3.31	48	c	500	c	98	c	c	c	
10/31/2006	c	c	c	1.98	3.47	c	426.1	c	c	c	22.4	c	
11/30/2006	c	c	c	2	c	c	c	56	c	c	c	1.74	
12/31/2006	c	c	c	2.6	c	c	514	c	c	c	c	5	11.3
1/31/2007	c	c	c	1.89	c	c	c	c	c	17.14	c	c	
2/28/2007	c	15	c	2.93	380.00	c	c	c	c	c	c	c	
3/31/2007	10.95	3.6	11.72	2.39	3.65	c	c	47.00	c	c	c	c	
4/30/2007	12.00	3.62	11.3	c	c	c	c	51.00	c	c	c	c	
5/31/2007	c	c	c	1.92	c	c	c	c	c	c	c	c	
6/30/2007	c	c	c	1.91	645.00	c	c	c	c	c	c	c	
7/31/2007	c	2.45	c	1.92	c	c	c	47.00	c	c	c	c	
8/31/2007	c	c	c	2.00	14.98	c	425.00	c	c	c	c	c	
9/30/2007	c	c	c	1.91	14.07	c	409.00	c	c	c	c	c	
10/31/2007	c	c	c	2.44	13.01	c	c	c	c	c	c	c	
11/30/2007	c	c	c	1.74	c	3202.00	457.00	c	c	c	c	c	

mg/l = milligrams per liter
 lbs/day = pounds per day
 c = compliant
 CBOD5 = 5-day carbonaceous biochemical oxygen demand
 NH3-N = ammonia nitrogen
 FCB = fecal coliform bacteria
 TSS = total suspended solids
 MGD = million gallons per day
 s.u. = standard units

Compliance History

Customer/Respondent/Owner-Operator:	CN600642771	City of Crandall	Classification: AVERAGE	Rating: 2.62
Regulated Entity:	RN101917136	CITY OF CRANDALL	Classification: AVERAGE	Site Rating: 2.24
ID Number(s):	WASTEWATER	EPA ID		TX0024929
	WASTEWATER	PERMIT		WQ0010834001
	WASTEWATER	PERMIT		TX0024929
	WASTEWATER LICENSING	LICENSE		WQ0010834001
Location:	2000 FT SW OF THE INTERSECTION OF BUFFALO CREEK AND FM 148, KAUFMAN COUNTY		Rating Date: September 01 07	Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX			
Date Compliance History Prep	March 19, 2008			
Agency Decision Requiring Compliance	Enforcement			
Compliance Period:	March 19, 2003 to March 19, 2008			
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History				
Name:	Thomas Jecha	Phone:	512 239 2576	

Site Compliance History Components

- | | |
|---|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance | 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.

Effective Date: 04/29/2006	ADMINORDER 2005-0837-MWD-E
Classification: Moderate	
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)	
Rqmt Prov: Effluent Limits PERMIT	
Description: Failure to comply with permit effluent limits as documented by a TCEQ record review of self-reported data.	
Classification: Minor	
Citation: 30 TAC Chapter 305, SubChapter F 305.125(17)	
Rqmt Prov: Self-reporting Requirements PERMIT	
Description: Failure to submit monitoring results at the intervals specified in the permit as documented by a TCEQ record review.	

- 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 | 03/24/2003 | (171032) |
| 2 | 04/11/2003 | (171033) |
| 3 | 05/19/2003 | (36563) |
| 4 | 05/23/2003 | (300799) |
| 5 | 06/20/2003 | (300800) |

6	07/16/2003	(300801)
7	07/18/2003	(144381)
8	08/14/2003	(300802)
9	09/26/2003	(300803)
10	10/17/2003	(300804)
11	11/10/2003	(300805)
12	12/18/2003	(300806)
13	01/20/2004	(300807)
14	02/11/2004	(300796)
15	03/11/2004	(300797)
16	04/21/2004	(300798)
17	05/13/2004	(354275)
18	06/21/2004	(354276)
19	07/16/2004	(354277)
20	08/23/2004	(354278)
21	09/30/2004	(354279)
22	10/13/2004	(383064)
23	11/23/2004	(354280)
24	12/22/2004	(383065)
25	01/28/2005	(383066)
26	03/02/2005	(420899)
27	03/04/2005	(348189)
28	03/29/2005	(420900)
29	04/18/2005	(420901)
30	05/23/2005	(420902)
31	06/20/2005	(420903)
32	08/03/2005	(441874)
33	08/29/2005	(441875)
34	09/23/2005	(441876)
35	11/07/2005	(470536)
36	11/07/2005	(470537)
37	12/27/2005	(470538)
38	02/06/2006	(470539)
39	02/16/2006	(470534)
40	02/17/2006	(451937)
41	03/22/2006	(470535)
42	04/07/2006	(462074)
43	04/28/2006	(499565)
44	08/02/2006	(521638)
45	10/24/2006	(546223)
46	10/24/2006	(546224)
47	01/11/2007	(578270)
48	01/11/2007	(578271)
49	03/28/2007	(578266)
50	03/28/2007	(578267)
51	03/28/2007	(578272)
52	04/09/2007	(578268)
53	05/22/2007	(620620)
54	06/18/2007	(578269)
55	07/13/2007	(602426)
56	12/14/2007	(620624)
57	12/14/2007	(620625)
58	12/17/2007	(620626)
59	12/21/2007	(635952)
60	01/21/2008	(620619)
61	01/21/2008	(620621)
62	01/21/2008	(620622)
63	01/21/2008	(620623)

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

Date: 05/20/2003 (36563)

Self Report? NO

Classification Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: I/I related two hour peak flow violations
Date: 05/31/2004 (354276)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 06/30/2004 (354277)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 07/31/2004 (354278)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 08/31/2004 (354279)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 09/30/2004 (383064)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 10/31/2004 (354280)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 11/30/2004 (383065)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 01/31/2005 (420899)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 02/28/2005 (420900)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 03/31/2005 (420901)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 05/31/2005 (420903)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date: 12/31/2005 (470539)
Self Report? YES Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

	TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	02/17/2006 (451937)		
Self Report?	NO	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to comply with effluent permit limitations. The permittee experienced the following effluent excursions: ammonia-nitrogen daily average 1, fecal coliform daily average 4, fecal coliform daily maximum 1, CBOD daily average 4, CBOD daily maximum 1.		
Self Report?	NO	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(5)		
Description:	Failure to properly maintain and operate the WWTF.		
Date:	02/28/2006 (470535)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		
	TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	03/31/2006 (499565)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	05/31/2006 (521638)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	06/30/2006 (620621)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	07/31/2006 (620622)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	08/31/2006 (546223)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	09/30/2006 (546224)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	10/31/2006 (578270)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	11/30/2006 (578271)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	12/31/2006 (578272)		
Self Report?	YES	Classification	Moderate

Description: 30 TAC Chapter 305, SubChapter F 305.125(1)
Failure to meet the limit for one or more permit parameter
Date: 12/21/2007 (635952)
Self Report? NO Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: 30 TAC Chapter 305, SubChapter F 305.125(17)
NON-RPT VIOS FOR MONIT PER OR PIPE
Self Report? NO Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: 30 TAC Chapter 305, SubChapter F 305.125(17)
NON-RPT VIOS FOR MONIT PER OR PIPE
Self Report? NO Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: 30 TAC Chapter 305, SubChapter F 305.125(17)
NON-RPT VIOS FOR MONIT PER OR PIPE
Self Report? NO Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: 30 TAC Chapter 305, SubChapter F 305.125(17)
NON-RPT VIOS FOR MONIT PER OR PIPE
Self Report? NO Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: 30 TAC Chapter 305, SubChapter F 305.125(17)
NON-RPT VIOS FOR MONIT PER OR PIPE
Self Report? NO Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: 30 TAC Chapter 305, SubChapter F 305.125(17)
NON-RPT VIOS FOR MONIT PER OR PIPE
Self Report? NO Classification Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: 30 TAC Chapter 305, SubChapter F 305.125(17)
NON-RPT VIOS FOR MONIT PER OR PIPE

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

Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	01/31/2007 (578266)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	02/28/2007 (578267)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	03/31/2007 (578268)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	04/30/2007 (620620)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	05/31/2007 (578269)		
Self Report?	YES	Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	06/30/2007 (602426)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	07/31/2007 (620623)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	08/31/2007 (620624)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	09/30/2007 (620625)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	10/31/2007 (620625)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to meet the limit for one or more permit parameter		
Date:	11/30/2007 (620626)		
Self Report?	YES	Classification	Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a)		

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CITY OF CRANDALL
RN101917136

§
§
§
§
§

BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2008-0589-MWD-E

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 Crandall ("the City") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the City presented this agreement to the Commission.

The City understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the City agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. 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. The duties and responsibilities imposed by this Agreed Order are binding upon the City.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The City owns and operates a wastewater treatment plant located approximately 2000 feet southwest of the intersection of Buffalo Creek and Farm-to-Market Road 148 in Crandall, Kaufman County, Texas (the "Facility").

2. The City has discharged municipal waste into or adjacent to any water in the state under TEX. WATER CODE ch. 26.
3. During an investigation on January 16, 2008, TCEQ staff determined that the City did not have an operator holding a valid license or registration operating the Facility.
4. During an investigation on January 16, 2008, TCEQ staff determined that the City did not submit the annual sludge reports for the monitoring periods ending July 31, 2006 and July 31, 2007.
5. During an investigation on January 16, 2008, TCEQ staff observed that the City did not maintain even flow over the weir of the east clarifier and a large amount of floating solids were observed in the clarifier.
6. During an investigation on January 16, 2008, TCEQ staff observed that the City did not comply with the permitted interim effluent limitations shown in the table below.

	EFFLUENT PARAMETER												
	Permit Limit												
	NH3-N daily avg loading (lbs/day)	NH3- N daily avg conc (mg/l)	NH3-N daily maximum (mg/l)	Dissolved Oxygen minimum (mg/l)	Flow daily average (MGD)	FCB daily avg (colonies/ 100 ml)	FCB 7-day avg (colonies/ 100 ml)	TSS daily maximum (mg/l)	TSS daily average loading (lbs/day)	CBOD5 daily average (mg/l)	CBOD5 daily max (mg/l)	pH min (s.u.)	pH max (s.u.)
Month/Year	10	2	10	5	0.6	200	400	40	75	7	22	9	9
6/30/2006	c	2.3	198	c	c	c	c	c	c	c	c	c	c
7/31/2006	c	c	c	c	c	c	c	c	c	31.3	c	c	c
8/31/2006	c	c	c	c	39.9	c	c	c	c	c	24	c	c
9/30/2006	c	c	c	3.31	48	c	500	c	98	c	c	c	c
10/31/2006	c	c	c	1.98	3.47	c	426.1	c	c	c	22.4	c	c
11/30/2006	c	c	c	2	c	c	c	56	c	c	c	1.74	c
12/31/2006	c	c	c	2.6	c	c	514	c	c	c	c	5	11.3
1/31/2007	c	c	c	1.89	c	c	c	c	c	17.14	c	c	c
2/28/2007	c	15	c	2.93	380.00	c	c	c	c	c	c	c	c
3/31/2007	10.95	3.6	11.72	2.39	3.65	c	c	47.00	c	c	c	c	c
4/30/2007	12.00	3.62	11.3	c	c	c	c	51.00	c	c	c	c	c
5/31/2007	c	c	c	1.92	c	c	c	c	c	c	c	c	c
6/30/2007	c	c	c	1.91	645.00	c	c	c	c	c	c	c	c
7/31/2007	c	2.45	c	1.92	c	c	c	47.00	c	c	c	c	c
8/31/2007	c	c	c	2.00	14.98	c	425.00	c	c	c	c	c	c
9/30/2007	c	c	c	1.91	14.07	c	409.00	c	c	c	c	c	c
10/31/2007	c	c	c	2.44	13.01	c	c	c	c	c	c	c	c
11/30/2007	c	c	c	1.74	c	3202.00	457.00	c	c	c	c	c	c

mg/l = milligrams per liter, lbs/day = pounds per day, c = compliant, s.u. = standard units, CBOD5 = 5-day carbonaceous biochemical oxygen demand, NH3-N = ammonia nitrogen, FCB = fecal coliform bacteria, TSS = total suspended solids, MGD = million gallons per day

7. During an investigation on January 16, 2008, TCEQ staff observed that the City did not submit noncompliance notification reports for exceeding carbonaceous biochemical oxygen demand ("CBOD"), total suspended solids ("TSS"), ammonia nitrogen, fecal coliform bacteria, dissolved oxygen, pH, or flow parameter limitations by more than 40% during the months of January through and including November 2007.

8. During an investigation on January 16, 2008, TCEQ staff documented that the City did not have records available during the investigation conducted on January 16, 2008 including: temperature records for calibration of the pH meter; barometric pressure records for calibration of the dissolved oxygen meter; annual calibration of the flow measuring device for 2007; and quality assurance records for fecal coliform bacteria analysis.
9. During an investigation on January 16, 2008, TCEQ staff determined that the City did not correctly calculate the values for fecal coliform, TSS, CBOD5, and ammonia nitrogen daily average loading reported in the discharge monitoring reports ("DMR") for February, September, and October 2007 and did not accurately identify effluent limit parameter exceedances.
10. During an investigation on January 16, 2008, TCEQ staff determined that the City did not submit a monthly DMR for May 2006.
11. During an investigation on January 16, 2008, TCEQ staff determined that the City did not prevent discharges of an unknown amount of untreated sewage to the ground from a collection system manhole near 120 Willow Lake Lane on August 5, 2007 and, during a follow-up investigation conducted on February 22, 2008, floating solids from the Facility outfall were observed in the receiving stream.
12. During an investigation on January 16, 2008, TCEQ staff determined that the City did not notify the TCEQ of the August 5, 2007 unauthorized discharge of sewage from a collection system manhole near 120 Willow Lake Lane.
13. During an investigation on January 16, 2008, TCEQ staff documented that the City did not timely submit the DMR for July 2007 (received on January 21, 2008) and DMRs for August, September, and October 2007 (received on December 14, 2007).
14. The City received notice of the violations on March 18, 2008.
15. The Executive Director recognizes that the City hired a certified wastewater treatment plant operator after the violation was documented during the January 16, 2008 investigation and prior to a follow-up investigation conducted on February 22, 2008.

II. CONCLUSIONS OF LAW

1. The City is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE chs. 7 and 26 and the rules of the Commission.
2. As evidenced by Findings of Fact No. 3, the City failed to employ or contract with one or more licensed wastewater treatment facility operators or wastewater system operations companies holding a valid license or registration, in violation of 30 TEX. ADMIN. CODE §§ 30.350(d) and 305.125(1) and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010834001, Other Requirements No. 1.

3. As evidenced by Findings of Fact No. 4, the City failed to submit the annual sludge reports, in violation of 30 TEX. ADMIN. CODE § 305.125(17) and TPDES Permit No. WQ0010834001, Sludge Provisions.
4. As evidenced by Findings of Fact No. 5, the City failed to properly operate and maintain all facilities and systems of treatment and control, in violation of 30 TEX. ADMIN. CODE §§ 305.125(5) and 317.4(d) and TPDES Permit No. WQ0010834001, Operational Requirements No. 1.
5. As evidenced by Findings of Fact No. 6, the City failed to comply with the permitted interim effluent limitations as shown in the table and certify compliance with the effluent limits of TPDES Permit NO. WQ0010834001, in violation of TEX. WATER CODE § 26.121(a), 30 TEX. ADMIN. CODE § 305.125(1), TPDES Permit No. WQ0010834001, Effluent Limitations and Monitoring Requirements No. 1 and 6; and Agreed Order Docket No. 2005-0837-MWD-E, Ordering Provision No. 3.b.
6. As evidenced by Findings of Fact No. 7, the City failed to submit noncompliance notification reports for effluent violations which deviate from the permitted effluent limitation by more than 40%, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirement No. 7.c.
7. As evidenced by Findings of Fact No. 8, the City failed to have all the required monitoring and reporting records available for review upon request, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and (11)(B) and 319.7(c) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 3.b.
8. As evidenced by Findings of Fact No. 9, the City failed to accurately complete monthly effluent reports, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1), 319.1, and 319.7(a)(5) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 2.
9. As evidenced by Findings of Fact No. 10, the City failed to submit monitoring results at the intervals specified in the permit, in violation of 30 TEX. ADMIN. CODE § 305.125(17) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 1.
10. As evidenced by Findings of Fact No. 11, the City failed to prevent the unauthorized discharge of wastewater from the sanitary sewer collection system and floating solids from the Facility, in violation of TEX. WATER CODE § 26.121(a), 30 TEX. ADMIN. CODE § 305.125(1) and (4), and TPDES Permit No. WQ0010834001, Effluent Limitations and Monitoring Requirements No. 4 and Permit Conditions No. 2.g.
11. As evidenced by Findings of Fact No. 12, the City failed to notify the TCEQ of noncompliances which may endanger human health or safety, or the environment, in violation of 30 TEX. ADMIN. CODE § 305.125(9) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 7.a.

12. As evidenced by Findings of Fact No. 13, the City failed to timely submit monthly effluent reports by the 20th day of the following month, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1), 319.1, and 319.7(d) and TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 1.
13. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against the City for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
14. An administrative penalty in the amount of Sixty-Three Thousand Six Hundred Sixteen Dollars (\$63,616) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053.

The Financial Assurance Section of the Commission's Financial Administration Division reviewed financial documentation submitted by the City and determined that the City is unable to pay the administrative penalty. Therefore, Sixty-Three Thousand Six Hundred Sixteen Dollars (\$63,616) of the penalty 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 a part of the deferred penalty.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The City is assessed an administrative penalty in the amount of Sixty-Three Thousand Six Hundred Sixteen Dollars (\$63,616) as set forth in Section II, Paragraph 14 above, for violations of TCEQ rules and state statutes. The City's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations and administrative penalty set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here.
2. The City shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order:
 - i. Update the Facility's operational guidance and conduct employee training to ensure that:
 1. Noncompliance notifications are timely submitted to the TCEQ Dallas/Fort Worth Regional Office for all collection system overflows and effluent violations that deviate from the permit limit by more than 40

percent, as required by TPDES Permit No. WQ0010843001, Monitoring and Reporting Requirements, No. 7.a. and 7.c.; and

2. All DMRs are submitted by the 20th day of the following month, as required by TPDES Permit No. WQ0010843001, Monitoring and Reporting Requirements, No. 1;
 - ii. Submit the annual sludge reports for the monitoring periods ending July 31, 2006 and 2007, as required by 30 TEX. ADMIN. CODE § 305.125(17) and TPDES Permit No. WQ0010834001, Sludge Provisions, Section II.F. or Section III.G., to the TCEQ locations shown in Ordering Provision 2.c. below;
 - iii. Begin maintaining all required records and have them readily available upon request for review by the TCEQ, as required by TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 3.b.;
 - iv. Submit revised DMRs for February, September, and October 2007 with values for fecal coliform, TSS, CBOD, and Ammonia Nitrogen daily average loading that are correctly calculated and properly indicate the correct number of exceedences for all parameters, as required by TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 2, to the TCEQ locations shown in Ordering Provision 2.c. below; and
 - v. Submit the delinquent May 2006 DMR, as required by the TPDES Permit No. WQ0010834001, Monitoring and Reporting Requirements No. 1., to the TCEQ locations shown in Ordering Provision 2.c. below;
- b. Within 60 days after the effective date of this Agreed Order:
 - i. Adjust the flow over the clarifier weir so it is uniform on all sides, as required by the TPDES Permit No. WQ0010834001, Operational Requirements No. 1;
 - ii. Identify and eliminate the cause of the collection system overflow that occurred near 120 Willow Lake Lane on August 5, 2007;
 - iii. Eliminate discharges of floating solids from the outfall to the receiving stream that exceed trace amounts;
 - iv. Remove any floating solids that were discharged from the Facility outfall and remain in the receiving stream;
 - v. Submit written certification of compliance with the effluent limits of TPDES Permit No. WQ0010834001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three

consecutive months of compliance with all permitted effluent limitations. The certification shall be in accordance with Ordering Provision No. 2.c below; and

- c. Within 75 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a. through 2.b.iv. 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 fines 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

with a copy to:

Water Section, Manager
Dallas/Fort Worth Regional Office
Texas Commission on Environmental Quality
2309 Gravel Drive
Fort Worth, Texas 76118-6951

3. 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.
4. If the City fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the City's failure to comply is not a violation of this Agreed Order. The City shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The City shall notify the Executive Director within seven days after the City becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
5. 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

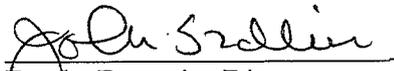
substantiated showing of good cause. All requests for extensions by the City shall be made in writing to the Executive Director. Extensions are not effective until the City receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

6. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the City if the Executive Director determines that the City has not complied with one or more of the terms or conditions in this Agreed Order.
7. 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.
8. 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.
9. 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.
10. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties. By law, the effective date of this Agreed Order is the third day after the mailing date, as provided by 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

4/17/2009

Date

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

I understand that by entering into this Agreed Order, the City of Crandall waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

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

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the 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;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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



Signature

2/19/09

Date

Heath Kaplan

Name (Printed or typed)
Authorized Representative of
City of Crandall

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. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial statements and for providing a clear audit trail. The records should be kept up-to-date and should be easily accessible to all relevant parties.

2. The second part of the document outlines the procedures for handling discrepancies. It is important to identify any errors as soon as possible and to investigate the cause of the discrepancy. Once the cause has been identified, the necessary steps should be taken to correct the error and to prevent it from recurring.

3. The third part of the document discusses the importance of regular communication between all parties involved in the financial process. This includes the management, the accounting department, and the external auditors. Regular communication helps to ensure that everyone is aware of the current status of the financial statements and any issues that may arise.

4. The fourth part of the document discusses the importance of maintaining a strong internal control system. This system should be designed to prevent and detect errors and fraud. It should include a clear separation of duties, a system of checks and balances, and a regular review process. The internal control system should be updated regularly to reflect changes in the business environment.

5. The fifth part of the document discusses the importance of providing accurate and timely financial information to all stakeholders. This includes the management, the board of directors, and the external auditors. The financial information should be presented in a clear and concise manner and should be supported by accurate records and documentation.

6. The sixth part of the document discusses the importance of maintaining a strong relationship with the external auditors. The auditors play a crucial role in ensuring the integrity of the financial statements and in providing an independent opinion on the financial statements. It is important to work closely with the auditors and to provide them with all the information they need to perform their duties.

7. The seventh part of the document discusses the importance of maintaining a strong relationship with the external auditors. The auditors play a crucial role in ensuring the integrity of the financial statements and in providing an independent opinion on the financial statements. It is important to work closely with the auditors and to provide them with all the information they need to perform their duties.

8. The eighth part of the document discusses the importance of maintaining a strong relationship with the external auditors. The auditors play a crucial role in ensuring the integrity of the financial statements and in providing an independent opinion on the financial statements. It is important to work closely with the auditors and to provide them with all the information they need to perform their duties.

9. The ninth part of the document discusses the importance of maintaining a strong relationship with the external auditors. The auditors play a crucial role in ensuring the integrity of the financial statements and in providing an independent opinion on the financial statements. It is important to work closely with the auditors and to provide them with all the information they need to perform their duties.

10. The tenth part of the document discusses the importance of maintaining a strong relationship with the external auditors. The auditors play a crucial role in ensuring the integrity of the financial statements and in providing an independent opinion on the financial statements. It is important to work closely with the auditors and to provide them with all the information they need to perform their duties.