

Executive Summary – Enforcement Matter – Case No. 58917
City of Pasadena
RN101609774
Docket No. 2020-0476-MWD-E

Order Type:

Findings Agreed Order

Findings Order Justification:

Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).

Media:

MWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Golden Acres Plant, located approximately 100 yards south of Spencer Highway and adjacent to the west edge of Trebor Street, Harris County

Type of Operation:

Wastewater treatment facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: The complainant has expressed an interest in this matter but does not wish to speak at Agenda.

Texas Register Publication Date: October 30, 2020

Comments Received: No

Penalty Information

Total Penalty Assessed: \$10,625

Total Paid to General Revenue: \$10,625

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Unsatisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): September 19, 2019

Complaint Information: Alleged there was an unauthorized discharge at the Facility.

Date(s) of Investigation: September 30, 2019

Date(s) of NOE(s): January 23, 2020

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Docket No. 2020-0476-MWD-E

Violation Information

1. Failed to prevent an unauthorized discharge of wastewater into or adjacent to any water in the state [TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010053011, Permit Conditions No. 2(g)].
2. Failed to report an unauthorized discharge orally to the Regional Office within 24 hours of becoming aware of the noncompliance, and in writing to the Regional Office and the Enforcement Division within five working days of becoming aware of the noncompliance [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010053011, Monitoring and Reporting Requirements No. 7.a].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures:

- a. By September 19, 2019, ceased the unauthorized discharges that occurred on September 18, 2019 and September 19, 2019, and cleaned, disinfected, and deodorized the affected areas;
- b. By October 1, 2019, submitted a written Unauthorized Discharge Incident Notification for unauthorized discharges that occurred on September 18, 2019 and September 19, 2019, and implemented procedures to ensure the TCEQ is notified within 24 hours of any accidental discharge or spill and a written Unauthorized Discharge Incident Notification is submitted to the TCEQ within 5 working days of the accidental discharge or spill; and
- c. By October 1, 2019, installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.

Technical Requirements:

The Order will require the Respondent to:

- a. Within 300 days, complete the construction of the six-pump lift station for the Facility; and
- b. Within 315 days, submit written certification to demonstrate compliance with a.

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Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Alejandro Laje, Enforcement Division,
Enforcement Team 3, MC 219, (512) 239-2547; Michael Parrish, Enforcement Division,
MC 219, (512) 239-2548

Respondent: The Honorable Jeff Wagner, Mayor, City of Pasadena, P.O. Box 672,
Pasadena, Texas 77501-0672
Robin S. Green, Jr., Public Works Director, City of Pasadena, P.O. Box 672, Pasadena,
Texas 77501-0672

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned	27-Jan-2020	Screening	5-Feb-2020	EPA Due	
	PCW	25-Mar-2020				

RESPONDENT/FACILITY INFORMATION	
Respondent	City of Pasadena
Reg. Ent. Ref. No.	RN101609774
Facility/Site Region	12-Houston
Major/Minor Source	Minor

CASE INFORMATION		No. of Violations	2
Enf./Case ID No.	58917	Order Type	Findings
Docket No.	2020-0476-MWD-E	Government/Non-Profit	Yes
Media Program(s)	Water Quality	Enf. Coordinator	Christopher Moreno
Multi-Media		EC's Team	Enforcement Team 3
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) **Subtotal 1**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History Adjustment **Subtotals 2, 3, & 7**

Notes: Enhancement for one NOV with same or similar violations, two Orders without denial of liability and Repeat Violator classification.

Culpability Enhancement **Subtotal 4**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments **Subtotal 5**

Economic Benefit Enhancement* **Subtotal 6**

Total EB Amounts
 Estimated Cost of Compliance
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7 **Final Subtotal**

OTHER FACTORS AS JUSTICE MAY REQUIRE Adjustment

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT **Final Assessed Penalty**

DEFERRAL Reduction Adjustment

Reduces the Final Assessed Penalty by the indicated percentage.

Notes

No deferral is recommended for Findings Orders.

PAYABLE PENALTY

Screening Date 5-Feb-2020

Docket No. 2020-0476-MWD-E

PCW

Respondent City of Pasadena

Policy Revision 4 (April 2014)

Case ID No. 58917

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN101609774

Media Water Quality

Enf. Coordinator Christopher Moreno

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	1	5%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	2	50%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 55%

>> Repeat Violator (Subtotal 3)

Adjustment Percentage (Subtotal 3) 25%

>> Compliance History Person Classification (Subtotal 7)

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with same or similar violations, two Orders without denial of liability and Repeat Violator classification.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 80%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 80%

Screening Date 5-Feb-2020

Docket No. 2020-0476-MWD-E

PCW

Respondent City of Pasadena

Policy Revision 4 (April 2014)

Case ID No. 58917

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN101609774

Media Water Quality

Enf. Coordinator Christopher Moreno

Violation Number 1

Rule Cite(s) Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010053011, Permit Conditions No. 2(g)

Violation Description Failed to prevent an unauthorized discharge of wastewater into or adjacent to any water in the state, as shown in the attached unauthorized discharge table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

Table with columns: Release (Actual, Potential), Harm (Major, Moderate, Minor), and Percent (5.0%). Includes 'OR' label.

>> Programmatic Matrix

Table with columns: Falsification, Major, Moderate, Minor, and Percent (0.0%).

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

Adjustment \$23,750

\$1,250

Violation Events

Number of Violation Events 3 Number of violation days 2

Table with frequency options: daily, weekly, monthly, quarterly (checked), semiannual, annual, single event.

Violation Base Penalty \$3,750

Three quarterly events are recommended, one event for each location an unauthorized discharge occurred.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Table for Good Faith Efforts with columns: Before NOE/NOV, NOE/NOV to EDRP/Settlement Offer, and rows: Extraordinary, Ordinary, N/A (checked).

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$3,750

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$213,746

Violation Final Penalty Total \$6,750

This violation Final Assessed Penalty (adjusted for limits) \$6,750

Economic Benefit Worksheet

Respondent City of Pasadena
Case ID No. 58917
Reg. Ent. Reference No. RN101609774
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	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$1,524,400	18-Sep-2019	18-Sep-2021	2.00	\$10,177	\$203,532	\$213,709
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$5,000	18-Sep-2019	19-Sep-2019	0.00	\$1	n/a	\$1
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$20,000	18-Sep-2019	1-Oct-2019	0.04	\$36	n/a	\$36

Notes for DELAYED costs

Engineering/Construction cost is the estimated amount to construct a six pump lift station. Date required is the first unauthorized discharge date and the final date is the estimated date of compliance.

Remediation/disposal cost is the estimated amount to cease the unauthorized discharges and clean, disinfect, and deodorize the affected areas. Date required is the date of the first unauthorized discharge and the final date is the date corrective actions were completed.

Other cost is the estimated amount to install a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps. Date required is the first unauthorized discharge date and the final date is the date corrective actions were completed.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$1,549,400

TOTAL

\$213,746

Screening Date 5-Feb-2020
Respondent City of Pasadena
Case ID No. 58917

Docket No. 2020-0476-MWD-E

PCW

Policy Revision 4 (April 2014)
 PCW Revision March 26, 2014

Reg. Ent. Reference No. RN101609774

Media Water Quality

Enf. Coordinator Christopher Moreno

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1) and TPDES Permit No. WQ0010053011, Monitoring and Reporting Requirements No. 7.a

Violation Description

Failed to report an unauthorized discharge orally to the Regional Office within 24 hours of becoming aware of the noncompliance, and in writing to the Regional Office and the Enforcement Division within five working days of becoming aware of the noncompliance. Specifically, notifications for three unauthorized discharges that occurred on September 18, 2019 and September 19, 2019 from the collection system were not submitted to the Houston Regional Office and the Enforcement Division.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				0.0%
	Potential				

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
	X			5.0%

Matrix Notes

100% of the rule requirements were not met.

Adjustment \$23,750

\$1,250

Violation Events

Number of Violation Events Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	X

Violation Base Penalty \$2,500

Two single events are recommended.

Good Faith Efforts to Comply

Reduction \$625

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary	
Ordinary	X
N/A	

Notes

The Respondent returned to compliance on October 1, 2019.

Violation Subtotal \$1,875

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$10

Violation Final Penalty Total \$3,875

This violation Final Assessed Penalty (adjusted for limits) \$3,875

Economic Benefit Worksheet

Respondent City of Pasadena
Case ID No. 58917
Reg. Ent. Reference No. RN101609774
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	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$100	30-Sep-2019	1-Oct-2019	0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$25	23-Sep-2019	1-Oct-2019	0.02	\$0	n/a	\$0

Notes for DELAYED costs

Estimated training/sampling cost to update the Facility's operational guidance and conduct employee training to ensure the TCEQ is notified within 24 hours of any accidental discharge or spill and a written Unauthorized Discharge Incident Notification is submitted to the TCEQ within 5 working days of the accidental discharge or spill. Date required is the investigation date. Final date is the date of compliance.

Estimated other cost to submit a 5-day written Unauthorized Discharge Incident Notification. Date required is the date the noncompliance notification was due. Final Date is the date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$10	19-Sep-2019	1-Oct-2019	0.03	\$0	\$10	\$10

Notes for AVOIDED costs

Estimated other cost (\$5 per notification event) to notify the TCEQ within 24 hours of any accidental discharge or spill. Date required is the date the 24-hour notification was due. Final Date is the date of compliance.

Approx. Cost of Compliance

\$135	TOTAL	\$10
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City of Pasadena
Golden Acres WWTP
TPDES Permit No. WQ0010053011
Docket No. 2020-0476-MWD-E

Unauthorized Discharge Table			
Date	Amount Discharged (gallons)	Description	Corrective Action
September 18, 2019	480	The collection manhole at 3015 Randolph overflowed due to inflow and infiltration and the Facility was down to one of three screw pumps due to catastrophic failure.	The area was cleaned, disinfected and deodorized. Also, installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.
September 18, 2019	600	The collection main line near 5812 Sandy overflowed due to inflow and infiltration and the Facility was down to one of three screw pumps due to catastrophic failure.	The area was cleaned, disinfected and deodorized. Also, installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.
September 18, 2019 - September 19, 2019	2,000	The collection manhole at 3801 Preston overflowed due to inflow and infiltration and the Facility was down to one of three screw pumps due to catastrophic failure.	The area was cleaned, disinfected and deodorized. Also, installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN600242648, RN101609774, Rating Year 2019 which includes Compliance History (CH) components from September 1, 2014, through August 31, 2019.

Customer, Respondent, or Owner/Operator: CN600242648, City of Pasadena **Classification:** SATISFACTORY **Rating:** 17.01

Regulated Entity: RN101609774, Golden Acres Plant **Classification:** UNSATISFACTORY **Rating:** 56.57

Complexity Points: 8 **Repeat Violator:** YES

CH Group: 08 - Sewage Treatment Facilities

Location: approximately 100 yards south of Spencer Highway and adjacent to the west edge of Trebor Street in Harris County, Texas

TCEQ Region: REGION 12 - HOUSTON

ID Number(s): WASTEWATER PERMIT WQ0010053011 WASTEWATER EPA ID TX0134813
WASTEWATER LICENSING LICENSE WQ0010053003

Compliance History Period: September 01, 2014 to August 31, 2019 **Rating Year:** 2019 **Rating Date:** 09/01/2019

Date Compliance History Report Prepared: June 18, 2020

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: June 18, 2015 to June 18, 2020

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Christopher Moreno **Phone:** (254) 761-3038

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1 Effective Date: 05/25/2016 ADMINORDER 2015-0087-MWD-E (Findings Order-Agreed Order Without Denial)
Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(5)
Rqmt Prov: TPDES PERMIT
Description: Failure to ensure that the Facility and all its systems of collection, treatment, and disposal are properly operated and maintained.
Classification: Major
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: Permit Conditions No. 2.g. PERMIT
Description: Failure to prevent the unauthorized discharge of wastewater into or adjacent to any water in the state
Classification: Moderate
Citation: 30 TAC Chapter 217, SubChapter A 217.6(c)
30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 309, SubChapter B 309.13(e)
Rqmt Prov: Other Requirements No. 7 & 10 PERMIT
Description: Failure to submit a Nuisance Odor Prevention Request and a Summary Transmittal Letter within 60 days from the date of permit issuance.
Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: Effluent Limitations and Monitoring Requ PERMIT
 Description: Failure to comply with permitted effluent limitations
 Classification: Minor
 Citation: 2A TWC Chapter 5, SubChapter A 5.702
 2D TWC Chapter 26, SubChapter A 26.0135(h)
 30 TAC Chapter 21 21.4

Description: Failed to pay Consolidated Water Quality fees and associated late fees for TCEQ Financial Administration Account No. 23005658 for Fiscal Year 2015, as documented during a record review on January 27, 2015.

2 Effective Date: 10/24/2018 ADMINORDER 2017-0983-MWD-E (Findings Order-Agreed Order Without Denial)

Classification: Major
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: TPDES Permit No. WQ0010053011 PERMIT

Description: Failed to prevent the unauthorized discharge of wastewater into or adjacent to any water in the state, in violation of TEX. WATER CODE § 26.121(a), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010053011, Permit Conditions No. 2.g.

Classification: Minor
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 30 TAC Chapter 305, SubChapter F 305.125(9)(A)

Rqmt Prov: TPDES Permit No. WQ0010053011 PERMIT

Description: Failed to report any noncompliance to the Executive Director which may endanger human health or safety, or the environment within 24 hours of becoming aware of the noncompliance, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (9)(A), and TPDES Permit No. WQ0010053011, Monitoring and Reporting Requirements No. 7.b.i.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	June 25, 2015	(1271734)	Item 29	February 21, 2018	(1489028)
Item 2	July 23, 2015	(1279319)	Item 30	April 23, 2018	(1492679)
Item 3	August 25, 2015	(1285514)	Item 31	May 16, 2018	(1502967)
Item 4	September 24, 2015	(1292611)	Item 32	June 14, 2018	(1510049)
Item 5	October 30, 2015	(1298761)	Item 33	July 20, 2018	(1516371)
Item 6	November 25, 2015	(1304216)	Item 34	September 17, 2018	(1529631)
Item 7	January 07, 2016	(1311205)	Item 35	September 20, 2018	(1522413)
Item 8	February 23, 2016	(1327338)	Item 36	October 16, 2018	(1535916)
Item 9	March 22, 2016	(1334125)	Item 37	November 15, 2018	(1543791)
Item 10	April 27, 2016	(1341250)	Item 38	November 21, 2018	(1531114)
Item 11	May 26, 2016	(1348059)	Item 39	December 17, 2018	(1547487)
Item 12	July 05, 2016	(1343274)	Item 40	January 15, 2019	(1566686)
Item 13	July 26, 2016	(1361462)	Item 41	February 15, 2019	(1566684)
Item 14	August 19, 2016	(1367890)	Item 42	March 14, 2019	(1566685)
Item 15	October 26, 2016	(1380789)	Item 43	April 17, 2019	(1574158)
Item 16	November 21, 2016	(1386739)	Item 44	May 16, 2019	(1587867)
Item 17	December 20, 2016	(1392869)	Item 45	June 12, 2019	(1587868)
Item 18	February 14, 2017	(1406388)	Item 46	July 17, 2019	(1595565)
Item 19	March 17, 2017	(1413503)	Item 47	September 17, 2019	(1608691)
Item 20	April 18, 2017	(1419954)	Item 48	September 20, 2019	(1601788)
Item 21	May 16, 2017	(1427594)	Item 49	October 17, 2019	(1615566)
Item 22	June 22, 2017	(1433609)	Item 50	November 15, 2019	(1621369)
Item 23	June 30, 2017	(1414543)	Item 51	December 16, 2019	(1628705)
Item 24	July 17, 2017	(1442166)	Item 52	January 21, 2020	(1636323)
Item 25	August 22, 2017	(1445829)	Item 53	February 24, 2020	(1642941)
Item 26	September 15, 2017	(1452435)	Item 54	March 16, 2020	(1649447)
Item 27	December 11, 2017	(1409783)	Item 55	May 06, 2020	(1655811)
Item 28	January 18, 2018	(1476896)			

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

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1 Date: 08/26/2019 (1577656)
Self Report? NO Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(5)
Description: Failed to prevent the unauthorized discharge of wastewater. Specifically, the facility reported two unauthorized discharges during the 18 months preceding the date of this investigation.

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

Component Appendices

Appendix A

All NOV's Issued During Component Period 6/18/2015 and 6/18/2020

- 1 Date: 05/31/2016 (1354483) Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 2 Date: 08/31/2016 (1380788) Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 3 Date: 12/31/2016 (1399472) Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 4 Date: 09/30/2017 (1458298) Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 5 Date: 10/31/2017 (1463743) Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 6 Date: 11/30/2017 (1470188) Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 7 Date: 01/08/2018 (1435308) Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 317 317.4(a)(8)
Description: The facility failed to test the reduced-pressure principal backflow prevention assembly (RPBA) annually.
Classification: Minor
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 305, SubChapter F 305.125(5)
Description: The facility failed to properly operate and maintain the facility.
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: The facility failed to prevent the unauthorized discharge of wastewater.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 217, SubChapter B 217.33(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: The facility failed to ensure flow measurement accuracy.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Description: The facility failed to maintain compliance with the permitted effluent limits.
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 319, SubChapter A 319.11(a)
30 TAC Chapter 319, SubChapter A 319.11(b)
Description: The facility failed to ensure proper preservation of effluent samples.
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 319, SubChapter A 319.7(a)
30 TAC Chapter 319, SubChapter A 319.7(c)
Description: The facility failed to maintain all monitoring and reporting records at the facility.
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: The facility failed to maintain compliance with the permitted effluent limits.

8 Date: 03/31/2018 (1495991)
Classification: Moderate

Self Report? YES For Informational Purposes Only
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

9* Date: 01/28/2019 (1532481)
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 317 317.4(a)(8)
Description: The facility failed to test the reduced-pressure principal backflow prevention assembly (RPBA) annually.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: The facility failed to prevent the unauthorized discharge of wastewater.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Description: The facility failed to maintain compliance with the permitted effluent limits.
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 319, SubChapter A 319.11(a)
30 TAC Chapter 319, SubChapter A 319.11(b)
Description: The facility failed to ensure proper preservation of effluent samples.
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 319, SubChapter A 319.7(a)
30 TAC Chapter 319, SubChapter A 319.7(c)
Description: The facility failed to maintain all monitoring and reporting records at the facility.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failed to prevent the unauthorized discharge of wastewater.

10* Date: 08/26/2019 (1577656)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(5)

Description: Failed to prevent the unauthorized discharge of wastewater. Specifically, the facility reported two unauthorized discharges during the 18 months preceding the date of this investigation.

* NOVs applicable for the Compliance History rating period 9/1/2014 to 8/31/2019

Appendix B

All Investigations Conducted During Component Period June 18, 2015 and June 18, 2020

Item 1*	June 25, 2015**	(1271734) For Informational Purposes Only
Item 2*	July 23, 2015**	(1279319) For Informational Purposes Only
Item 3*	August 25, 2015**	(1285514) For Informational Purposes Only
Item 4*	September 24, 2015**	(1292611) For Informational Purposes Only
Item 5*	October 30, 2015**	(1298761) For Informational Purposes Only
Item 6*	November 25, 2015**	(1304216) For Informational Purposes Only
Item 7*	January 07, 2016**	(1311205) For Informational Purposes Only
Item 8*	February 23, 2016**	(1327338) For Informational Purposes Only
Item 9*	March 22, 2016**	(1334125) For Informational Purposes Only
Item 10*	April 27, 2016**	(1341250) For Informational Purposes Only
Item 11*	May 26, 2016**	(1348059) For Informational Purposes Only
Item 12	June 22, 2016**	(1354483) For Informational Purposes Only
Item 13*	July 05, 2016**	(1343274) For Informational Purposes Only
Item 14*	July 26, 2016**	(1361462) For Informational Purposes Only
Item 15*	August 19, 2016**	(1367890) For Informational Purposes Only
Item 16*	October 26, 2016**	(1380789) For Informational Purposes Only

Item 17	November 01, 2016**	(1380788) For Informational Purposes Only
Item 18*	November 21, 2016**	(1386739) For Informational Purposes Only
Item 19*	December 20, 2016**	(1392869) For Informational Purposes Only
Item 20	January 17, 2017**	(1399472) For Informational Purposes Only
Item 21*	February 14, 2017**	(1406388) For Informational Purposes Only
Item 22*	March 17, 2017**	(1413503) For Informational Purposes Only
Item 23*	April 18, 2017**	(1419954) For Informational Purposes Only
Item 24*	May 16, 2017**	(1427594) For Informational Purposes Only
Item 25	June 16, 2017**	(1375591) For Informational Purposes Only
Item 26*	June 22, 2017**	(1433609) For Informational Purposes Only
Item 27*	June 30, 2017**	(1414543) For Informational Purposes Only
Item 28*	July 17, 2017**	(1442166) For Informational Purposes Only
Item 29*	August 22, 2017**	(1445829) For Informational Purposes Only
Item 30*	September 15, 2017**	(1452435) For Informational Purposes Only
Item 31	October 20, 2017**	(1458298) For Informational Purposes Only
Item 32	November 17, 2017**	(1463743) For Informational Purposes Only
Item 33*	December 11, 2017**	(1409783) For Informational Purposes Only
Item 34	December 12, 2017**	(1470188) For Informational Purposes Only
Item 35*	January 18, 2018**	(1476896) For Informational Purposes Only
Item 36*	February 21, 2018**	(1489028) For Informational Purposes Only
Item 37*	April 23, 2018**	(1492679) For Informational Purposes Only
		(1502967)

Item 38*	May 16, 2018**	For Informational Purposes Only (1510049)
Item 39*	June 14, 2018**	For Informational Purposes Only (1516371)
Item 40*	July 20, 2018**	For Informational Purposes Only (1529631)
Item 41*	September 17, 2018**	For Informational Purposes Only (1522413)
Item 42*	September 20, 2018**	For Informational Purposes Only (1535916)
Item 43*	October 16, 2018**	For Informational Purposes Only (1543791)
Item 44*	November 15, 2018**	For Informational Purposes Only (1531114)
Item 45*	November 21, 2018**	For Informational Purposes Only (1547487)
Item 46*	December 17, 2018**	For Informational Purposes Only (1566686)
Item 47*	January 15, 2019**	For Informational Purposes Only (1566684)
Item 48*	February 15, 2019**	For Informational Purposes Only (1566685)
Item 49*	March 14, 2019**	For Informational Purposes Only (1574158)
Item 50*	April 17, 2019**	For Informational Purposes Only (1587867)
Item 51*	May 16, 2019**	For Informational Purposes Only (1587868)
Item 52*	June 12, 2019**	For Informational Purposes Only (1595565)
Item 53*	July 17, 2019**	For Informational Purposes Only (1577656)
Item 54	August 26, 2019**	For Informational Purposes Only (1608691)
Item 55*	September 17, 2019	For Informational Purposes Only (1601788)
Item 56*	September 20, 2019	For Informational Purposes Only (1615566)
Item 57*	October 17, 2019	For Informational Purposes Only (1621369)
Item 58*	November 15, 2019	For Informational Purposes Only (1628705)
Item 59*	December 16, 2019	For Informational Purposes Only

Item 60*	January 21, 2020	(1636323) For Informational Purposes Only
Item 61*	February 24, 2020	(1642941) For Informational Purposes Only
Item 62*	March 16, 2020	(1649447) For Informational Purposes Only
Item 63*	May 06, 2020	(1655811) For Informational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2014 and 08/31/2019.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CITY OF PASADENA
RN101609774**

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§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2020-0476-MWD-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Pasadena (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including 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 Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

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

I. FINDINGS OF FACT

1. The Respondent owns and operates a wastewater treatment facility located approximately 100 yards south of Spencer Highway and adjacent to the west edge of Trebor Street with an associated wastewater collection system in Harris County, Texas (the "Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. During an investigation conducted on September 30, 2019, an investigator documented that the Respondent:
 - a. Did not prevent an unauthorized discharge of wastewater into or adjacent to any water in the state, as shown in the unauthorized discharge table below:

Date	Amount Discharged (gallons)	Description	Corrective Action
September 18, 2019	480	The collection manhole at 3015 Randolph overflowed due to inflow and infiltration and the Facility was down to one of three screw pumps due to catastrophic failure.	The area was cleaned, disinfected, and deodorized. Also, installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.
September 18, 2019	600	The collection main line near 5812 Sandy overflowed due to inflow and infiltration and the Facility was down to one of three screw pumps due to catastrophic failure.	The area was cleaned, disinfected, and deodorized. Also, installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.
September 18, 2019 - September 19, 2019	2,000	The collection manhole at 3801 Preston overflowed due to inflow and infiltration and the Facility was down to one of three screw pumps due to catastrophic failure.	The area was cleaned, disinfected, and deodorized. Also, installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.

- b. Notifications for three unauthorized discharges that occurred on September 18, 2019 and September 19, 2019 from the collection system were not submitted to the Houston Regional Office and the Enforcement Division.
3. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Facility:
- a. By September 19, 2019, ceased the unauthorized discharges that occurred on September 18, 2019 and September 19, 2019, and cleaned, disinfected, and deodorized the affected areas.
 - b. By October 1, 2019, the Respondent submitted a written Unauthorized Discharge Incident Notification for unauthorized discharges that occurred on September 18, 2019 and September 19, 2019, and implemented procedures to ensure the TCEQ is notified within 24 hours of any accidental discharge or spill and a written Unauthorized Discharge Incident Notification is submitted to the TCEQ within 5 working days of the accidental discharge or spill.
 - c. By October 1, 2019, the Respondent installed a 12-inch submersible pump to increase flow capacity and two 6-inch diesel high flow back up pumps.

II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE ch. 26 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to prevent an unauthorized discharge of wastewater into or adjacent to any water in the state, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010053011, Permit Conditions No. 2(g).
3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to report an unauthorized discharge orally to the Regional Office within 24 hours of becoming aware of the noncompliance, and in writing to the Regional Office and the Enforcement Division within five working days of becoming aware of the noncompliance, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010053011, Monitoring and Reporting Requirements No. 7.a
4. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
5. An administrative penalty in the amount of \$10,625 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$10,625 penalty.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 5 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Pasadena, Docket No. 2020-0476-MWD-E" to:

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

2. The Respondent shall undertake the following technical requirements:
 - a. Within 300 days after the effective date of this Order, complete the construction of the six-pump lift station for the Facility.
 - b. Within 315 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall 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
Houston Regional Office
Texas Commission on Environmental Quality
5425 Polk Street, Suite H
Houston, Texas 77023-1452

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the

- Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
 7. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
 9. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this 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.
 10. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
 11. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



05/12/2021

For the Executive Director

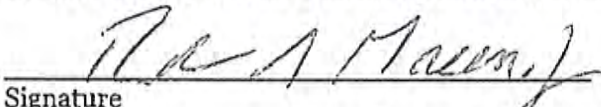
Date

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

I also understand that 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.



09/09/20

Signature

Date

ROBIN S. GREEN, JR.

PUBLIC WORKS DIRECTOR

Name (Printed or typed)

Title

Authorized Representative of
City of Pasadena

If mailing address has changed, please check this box and provide the new address below:

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.