## Order Type:

Findings Agreed Order

#### **Findings Order Justification:**

Indifference to legal duty based on violation of a previous order.

#### Media: MWD

#### **Small Business:** N/A

## **Location Where Violations Occurred:**

approximately 1.5 miles south-southwest of the intersection of United States Highway 83 and Farm-to-Market Road 2521, Hidalgo County

10

July 17, 2018

#### Type of Operation:

Date of NOE:

wastewater treatment facility

Other Significant Matters: Additional Pending Enforcement Actions: Past-Due Penalties: Past-Due Fees: Other: Interested Third Parties:	Yes, 2022-1467-UTL-E None \$2.76 None None
<b>Texas Register Publication Date:</b>	February 24, 2023
Comments Received:	None
Pen	alty Information
Total Penalty Assessed:	\$218,812
<b>Deferred for Financial Inability to Pay:</b> Confidential information, which may include financial information, has been provided to the Commission for its consideration.	\$218,812
Total Paid to General Revenue:	\$0
Total Due to General Revenue:	\$0
<b>Compliance History Classifications:</b> Person/CN – Satisfactory Site/RN – Satisfactory	
Major Source:	No
Statutory Limit Adjustment:	None
Applicable Penalty Policy:	April 2014
Investi	igation Information
Complaint Date:	N/A
Dates of Investigation:	April 5, 2018
Dates of NOVs:	See Compliance History –
	_

#### EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 41134 City of La Joya RN101920361 Docket No. 2019-0545-MWD-E

#### Violation Information

- 1. Failed to comply with the permitted effluent limitations [TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0012675001, Interim and Interim I Effluent Limitations and Monitoring Requirements Nos. 1 and 3, and TCEQ Agreed Order Docket No. 2011-0244-MWD-E, Ordering Provision No. 3.c].
- 2. Failed to comply with the permitted effluent limitations [TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), TPDES Permit No. WQ0012675001, Interim and Interim I Effluent Limitations and Monitoring Requirements No. 1, and TCEQ Agreed Order Docket No. 2011-0244-MWD-E, Ordering Provision No. 3.c].
- 3. Failed to comply with the permitted effluent limitations [TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), TPDES Permit No. WQ0012675001, Interim and Interim I Effluent Limitations and Monitoring Requirements Nos. 1 and 3, and TCEQ Agreed Order Docket No. 2011-0244-MWD-E, Ordering Provision No. 3.c].
- 4. Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative [30 TEX. ADMIN. CODE §§ 305.125(1) and (11)(B) and 319.7(c) and TPDES Permit No. WQ0012675001, Monitoring and Reporting Requirements No. 3.b].
- 5. Failed to report to the TCEQ in writing, any effluent violation which deviates from the permitted limitation by more than 40% within five working days of becoming aware of the noncompliance for the monitoring periods [30 TEX. ADMIN. CODE § 305.125(1) and (9)(A) and TPDES Permit No. WQ0012675001, Monitoring and Reporting Requirements No. 7.c].
- 6. Failed to timely submit effluent monitoring results at the intervals specified in the permit [30 TEX. ADMIN CODE §§ 305.125(1) and (17) and 319.7(d) and TPDES Permit No. WQ0012675001 Monitoring and Reporting Requirements No. 1].
- 7. Failed to timely submit annual sludge reports ("ASRs") at the intervals specified in the permit [30 TEX. ADMIN. CODE § 305.125(1) and (17) and TPDES Permit No. WQ0012675001 Sludge Provisions].
- 8. Failed to submit ASRs at the intervals specified in the permit [30 Tex. ADMIN CODE § 305.125(1) and (17) and TPDES Permit No. WQ0012675001 Sludge Provisions].
- 9. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 Tex. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0012675001, Operational Requirements No. 1].
- 10. Failed to comply with all permit conditions [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0012675001, Other Requirements No. 10].
- 11. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 Tex. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0012675001, Operational Requirements No. 1].
- 12. Failed to prevent the unauthorized discharge of untreated wastewater from the wastewater collection system into or adjacent to any water in the state [TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1) and (5), and TPDES Permit No. WQ0012675001, Permit Conditions No. 2.g].

#### Corrective Actions/Technical Requirements

#### **Corrective Actions Completed:**

1. Submitted the Discharge Monitoring Reports ("DMRs") for the monthly monitoring periods of January 2016, February 2016, March 2016, May 2016, June 2016, July 2016, August 2016, September 2016, October 2016, November 2016, December 2016, January 2017, February 2017, March 2017, April 2017, May 2017, June 2017, July 2017, August 2017, September 2017, October 2017, November 2017, January 2018, and February 2018, by April 5, 2018; and

#### EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 41134 City of La Joya RN101920361 Docket No. 2019-0545-MWD-E

2. Submitted the ASRs for the monitoring periods ending July 31, 2016, and July 31, 2017, on January 10, 2018.

#### **Technical Requirements:**

- 1. Within 30 days:
  - a. Update operational procedures and conduct employee training to ensure that all required records are maintained and made readily available for review by a TCEQ representative, including the operator manual and maintenance records and all self-reporting requirements are properly accomplished, including the timely submittal of signed and certified ASRs, quarterly progress reports, complete and accurate DMRs, and noncompliance notifications;
  - b. Submit the ASRs for the monitoring periods ending July 31, 2014, and July 31, 2015;
  - c. Submit the April 1, 2018, quarterly progress report to address compliance with effluent limitations for biochemical oxygen demand (5-day), total suspended solids and *E. coli*.;
  - d. Develop and implement a solids management plan at the Facility;
  - e. Repair or replace the leaking wastewater pump located at Lift Station No. 1; and
  - f. Clean and disinfect the affected area and properly dispose of the untreated wastewater from Lift Station No. 1.
- 2. Within 60 days repair or replace the aerator in the final storage pond and ensure that no algal growths are present in the pond.
- 3. Within 130 days submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0012675001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported DMRs, demonstrating at least three consecutive months of compliance with all permitted effluent limitations.
- 4. Within 180 days remove and properly dispose of the excess sludge from facultative ponds 1 and 2.
- 5. Submit written certification to demonstrate compliance:
  - a. Within 45 days for Technical Requirements Nos. 1.a. through 1.f.
  - b. Within 75 days for Technical Requirement No. 2.
  - c. Within 195 days for Technical Requirement No. 4.

#### Litigation Information

Settlement Date:

January 10, 2023

#### **Contact Information**

**TCEQ Attorneys:** Tracy Chandler, Litigation Division, (512) 239-3400

Sheldon Wayne, Public Interest Counsel, (512) 239-6363

**TCEQ Litigation Agenda Coordinator:** Katherine McKenzie, Litigation Division, (512) 239-2575

**TCEQ Enforcement Coordinator:** Katy Montgomery, Enforcement Division, (210) 403-4016

**TCEQ Regional Contact:** Jaime A. Garza, Harlingen Regional Office, (956) 425-6010

Respondent Contact: Isidro Casanova, Mayor, City of La Joya, P.O. Box H, La Joya, Texas 78560

Respondent's Attorney: N/A

THIS PAGE INTENTIONALLY LEFT BLANK

	Policy Revision 4 (A)		nalty Ca	lculatio	n Worksh	neet (PC	•	Revision March 26	5, 2014
TCEQ DATES	Assigned PCW	23-Jul-2018 23-Apr-2019	Screening 2	<mark>3-Aug-2018</mark>	EPA Due				
Reg			N		Major/M	linor Source	Minor		
CASE I	NFORMATION f./Case ID No.	41134				of Violations	12		
	lia Program(s) Multi-Media				Government Enf.	Coordinator			
Adr	nin. Penalty \$ I	_imit Minimum		<sup>aximum</sup> Calcula	<sup>\$25,000</sup>	on			
		LTY (Sum of		ase penal	ies)		Subtotal 1	\$157	7,125
ADJU	STMENTS (+ Subtotals 2-7 are of Compliance Hi	/-) TO SUBTC otained by multiplying story	<b>)TAL 1</b> the Total Base Pen	alty (Subtotal 1 <b>50.0%</b>	) by the indicated po Adjustment		tals 2, 3, & 7	\$78	8,562
	Notes	Enhancement f	5 1	ported effluer e/similar viol	nt violations, and ations.	d two NOVs			
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Re	spondent does	not meet the	culpability crite	eria.			
	Good Faith Eff	ort to Comply To	otal Adjustme	nts			Subtotal 5		\$0
	Economic Bene Estimated	efit Total EB Amounts Cost of Compliance	\$425,978 \$1,013,436		Enhancement* d at the Total EB \$ A	Amount	Subtotal 6		\$0
SUM (	OF SUBTOTA	LS 1-7				F	inal Subtotal	\$23	5,687
Deducer	en anderen en en tilsen Etrand	Subtotal by the indic	a barah sa sa sa sa Tara sa s	E	-7.2%		Adjustment	-\$10	6,875
	Notes	Recommended r	reduction to pre	event the rep ting the pena		from overly			
						Final Pen	alty Amount		8,812
		ADJUSTMEN	IT				ssed Penalty	\$218	8,812
DEFER Reduces t		nalty by the indicated	percentage.		0.0%	Reduction	Adjustment		\$0
	Notes	No d	eferral is recon	nmended for	Findings Orders				
PAYA	BLE PENALTY	1						\$218	8,812

Judgments       consent decrees meeting criteria)			Any non-adjudicated final court judgments or consent decrees containing a den of liability of this state or the federal government ( <i>number of judgments</i> of liability of this state or the federal government ( <i>number of judgments</i> of liability of the state or the federal government ( <i>number of judgments</i> of liability of the state or the federal government ( <i>number of judgments</i> of liability of the state or the federal government ( <i>number of judgments</i> of liability of the state or the federal government ( <i>number of judgments</i> or the federal government) of the state of the		0%	
Decrees       Any adjudicated final court judgments and default judgments, or onn-adjudicated final court judgments or consent decrees without a denial of liability, of this state       0       0%         Convictions       Any criminal convictions of this state or the federal government (number of 0       0%       0%         Emissions       Chronic excessive emissions events (number of events)       0       0%         Audits       Discourte vidgments or conservative director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privlege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)       0%       0%         Audits       Environmental, Health, and Safety Audit Privlege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)       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       No       0%         Voluntary on-site compliance assessments conducted by the executive director       No       0%         Zerly compliance with, or offer of a product that meets future state or federal No       0%         Zerly compliance with, or offer of a product that meets future state or federal No       0%         Zerly compliance History Person Classification (Subtotal 7)       0%         Setatisfactory Performer       Adjustment Percentage (Subtota	1	5	consent decrees meeting criteria )			
Connections       counts)       0       0%         Emissions       Chronic excessive emissions events (number of events)       0       0%         Emissions       Chronic excessive emissions events (number of events)       0       0%         Audits       Enters notifying the executive director of an intended audit conducted under the 1995 (number of audits for which notices were submitted)       0       0%         Audits       Disclosures of violations ounder the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)       0       0%         Other       Environmental management systems in place for one year or more       No       0%         Other       Participation in a voluntary pollution reduction program       No       0%         Other       Participation in a voluntary pollution reduction program       No       0%         Adjustment Percentage (Subtotal 2)       50%         >> Repeat Violator (Subtal 3)       0%         >> Compliance History Person Classification (Subtotal 7)       Satisfactory Performer       Adjustment Percentage (Subtotal 7)       0%         >> Compliance History Summary Notes       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       0%         >> Compliance History Summary Notes       Enhancement for eight self-reported effluent vio			final court judgments or consent decrees without a denial of liability, of this sta		0%	
Audits       Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 0       0%         Audits       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 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       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 No       0%       0%         >> Repeat Violator (Subtotal 3)       Mo       0%       0%         >> Compliance History Performer       Adjustment Percentage (Subtotal 3)       0%         >> Compliance History Summary       Adjustment Percentage (Subtotal 7)       0%         >> Compliance History Summary       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       0%         >> Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)       50%         >> Final Compliance History Adjustment       Sumage Summary       Suma Summary		Convictions		of 0	0%	
Audits       Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 0       0%         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 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 No       0%       0%         Participation in a voluntary pollution reduction program       No       0%         Participation in a voluntary pollution reduction program       No       0%         Solvernment environmental requirements       0       0%         Voluntary on-site compliance with, or offer of a product that meets future state or federal government environmental requirements       No       0%         Solvernment environmental requirements       No       0%       0%         >> Repeat Violator (Subtotal 3)       Mo       0%       0%         >> Compliance History Performer       Adjustment Percentage (Subtotal 3)       0%         >> Compliance History Summary       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       Sof         >> Compliance History Adjustment       Enhancement for eight s		Emissions	Chronic excessive emissions events (number of events)	0	0%	
bisclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were</i> 0 0%		Audito	Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislatur		0%	
Other       Voluntary on-site compliance assessments conducted by the executive director       No       0%         Participation in a voluntary pollution reduction 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%         >>       Repeat Violator (Subtotal 3)       0%       0%         >>       No       Adjustment Percentage (Subtotal 2)       50%         >>       Repeat Violator (Subtotal 3)       0%       0%         >>       Compliance History Person Classification (Subtotal 7)       Satisfactory Performer       Adjustment Percentage (Subtotal 7)       0%         >>       Compliance History Summary       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       0%         >>       Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)       50%         >>       Final Compliance History Adjustment       50%		Addits	Privilege Act, 74th Legislature, 1995 (number of audits for which violations we		0%	
Other       Voluntary on-site compliance assessments conducted by the executive director       No       0%         Participation in a voluntary pollution reduction 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%         >>       Repeat Violator (Subtotal 3)       0%       0%         >>       No       Adjustment Percentage (Subtotal 2)       50%         >>       Compliance History Person Classification (Subtotal 7)       0%         >>       Compliance History Summary       0%         Compliance History Summary       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       0%         >>       Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)       50%         >>       Final Compliance History Adjustment       9			Environmental management systems in place for one year or more	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)       50%         >>       Repeat Violator (Subtotal 3)       50%         >>       No       Adjustment Percentage (Subtotal 2)       50%         >>       No       Adjustment Percentage (Subtotal 3)       0%         >>       Compliance History Person Classification (Subtotal 7)       0%         >>       Satisfactory Performer       Adjustment Percentage (Subtotal 7)       0%         >>       Compliance History Summary       0%       0%         >>       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       50%         >>       Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)       50%		Other	Voluntary on-site compliance assessments conducted by the executive direct	or		
government environmental requirements       No       0%         Adjustment Percentage (Subtotal 2)       50%         >> Repeat Violator (Subtotal 3)       No       Adjustment Percentage (Subtotal 2)       50%         >> Compliance History Person Classification (Subtotal 7)       Adjustment Percentage (Subtotal 7)       0%         >> Compliance History Summary       Compliance History Summary       0%         Compliance History Summary       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       50%         >> Final Compliance History Adjustment       50%		other	Participation in a voluntary pollution reduction program	No	0%	
>> Repeat Violator (Subtotal 3)   No Adjustment Percentage (Subtotal 3)   No Adjustment Percentage (Subtotal 3)   >> Compliance History Performer Adjustment Percentage (Subtotal 7)   >> Compliance History Summary   Compliance History Notes   Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.   Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)   50%			, , , , ,	ral No	0%	
No       Adjustment Percentage (Subtotal 3)       0%         >> Compliance History Person Classification (Subtotal 7)       Adjustment Percentage (Subtotal 7)       0%         >> Compliance History Summary         Compliance History Summary         Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)       50%         >> Final Compliance History Adjustment			Adjustment F	Percentage (Sub	ototal 2)	50%
>> Compliance History Person Classification (Subtotal 7)          Satisfactory Performer       Adjustment Percentage (Subtotal 7)         >> Compliance History Summary         Compliance History Reformer         History Notes         Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.         Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)         50%         >> Final Compliance History Adjustment	>> Re	peat Violator	Subtotal 3)			
Satisfactory Performer       Adjustment Percentage (Subtotal 7)       0%         >> Compliance History Summary       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       0%         Image: Compliance History Notes       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.       0%         Image: Compliance History Notes       Image: Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)       50%         >> Final Compliance History Adjustment       Image: Compliance History Adjustment       Image: Compliance History Adjustment		No	Adjustment F	Percentage (Sub	ototal 3)	0%
>> Compliance History Summary          Compliance History Notes       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.         Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)         50%         >> Final Compliance History Adjustment	>> Co	mpliance Hist	bry Person Classification (Subtotal 7)			
Compliance History Notes       Enhancement for eight self-reported effluent violations, and two NOVs with same/similar violations.         Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)       50%         >> Final Compliance History Adjustment       50%		Satisfactory	erformer Adjustment F	Percentage (Sub	ototal 7)	0%
History Notes       Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)         >> Final Compliance History Adjustment	>> Co	mpliance Hist	ory Summary			
>> Final Compliance History Adjustment		History		same/similar		
			Total Compliance History Adjustment Percentage	(Subtotals 2,	3, & 7)	50%
Final Adjustment Percentage *capped at 100% 50%	>> Fina	I Compliance				
			Final Adjustment Perce	ntage *capped	at 100%	50%

#### Screening Date 23-Aug-2018 Respondent City of La Joya Case ID No. 41134 Reg. Ent. Reference No. RN101920361 Media Water Quality Enf. Coordinator

Number of...

Other written NOVs

orders meeting criteria)

>>

Component

NOVs

Orders

### **Compliance History Worksheet**

Written notices of violation ("NOVs") with same or similar violations as those in

Any agreed final enforcement orders containing a denial of liability (number of

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

the current enforcement action (number of NOVs meeting criteria)

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

Adjust.

50%

0%

0%

0%

Number

10

0

0

0

Compliance History Site Enhancement (Subtotal 2)

PCW

		ening Date		Dock	<b>(et No.</b> 2019-0545-MWD-E		PCW
		espondent ase ID No.	City of La Joya				ion 4 (April 2014)
Reg. En			RN101920361			PCW REVISIO	n March 26, 2014
		Media	Water Quality				
		oordinator tion Number	Alejandro Laje				
	VIOIA	tion Number				-	
		Rule Cite(s)	Pollutant Discharge Interim and Interim 3 and Texas Commis	e Elimination System (' I Effluent Limitations and ssion on Environmental	x. Admin. Code § 305.125(1) and 'TPDES") Permit No. WQ0012675( nd Monitoring Requirements Nos. I Quality ("TCEQ") Agreed Order D dering Provision No. 3.c	001, 1 and	
v	iolation/	Description	Failed to comply with	h the permitted effluen	t limitations, as shown in Attachm	ent A.	
					Base Pe	enalty	\$25,000
>> Enviro	onmen	ital, Propei	ty and Human H H	lealth Matrix arm			
OR		Release		derate Minor			
UR		Actual Potential	<u> </u>		Percent 30.0%		
			<u> </u>				
>>Progra	ammat	Falsification	Major Moo	derate Minor			
					Percent 0.0%		
	6						
	Matrix Notes	(5-day) to de <i>Escherichia</i> health or the o	termine whether the coli ("E. coli"), flow, environment has been	discharged amounts of pH, and total suspenden exposed to pollutants	ochemical oxygen demand pollutants exceeded protective le ed solids were also evaluated. Hun which exceed levels that are prot as a result of the violation.	nan	
					Adjustment \$1	17,500	
							\$7,500
Violation	Event	s					
		-					
		Number of \	/iolation Events	11	332 Number of violation days	5	
			daily				
			weekly	V			
			monthly quarterly	<u>^</u>	Violation Base Pe	enalty	\$82,500
			semiannual				
			annual single event				
	F					i	
			, 013, August 2014, Se	,	monitoring periods of November r 2014, January 2015, February 2 nd February 2018.		
Good Fait	th Effo	rts to Com	ply	0.0%	Red	uction	\$0
				NOE/NOV NOE/NOV to EDP	RP/Settlement Offer		
			Ordinary				
			N/A	X			
			Notes The F		eet the good faith criteria for olation.		
					Violation Su	btotal	\$82,500
Economic	: Bene	fit (EB) for	this violation		Statutory Limit Te	st	
		Estimate	ed EB Amount	\$423,973	Violation Final Penalty	Total	\$114,890
			т	his violation Final As	sessed Penalty (adjusted for li	imits)	\$114,890

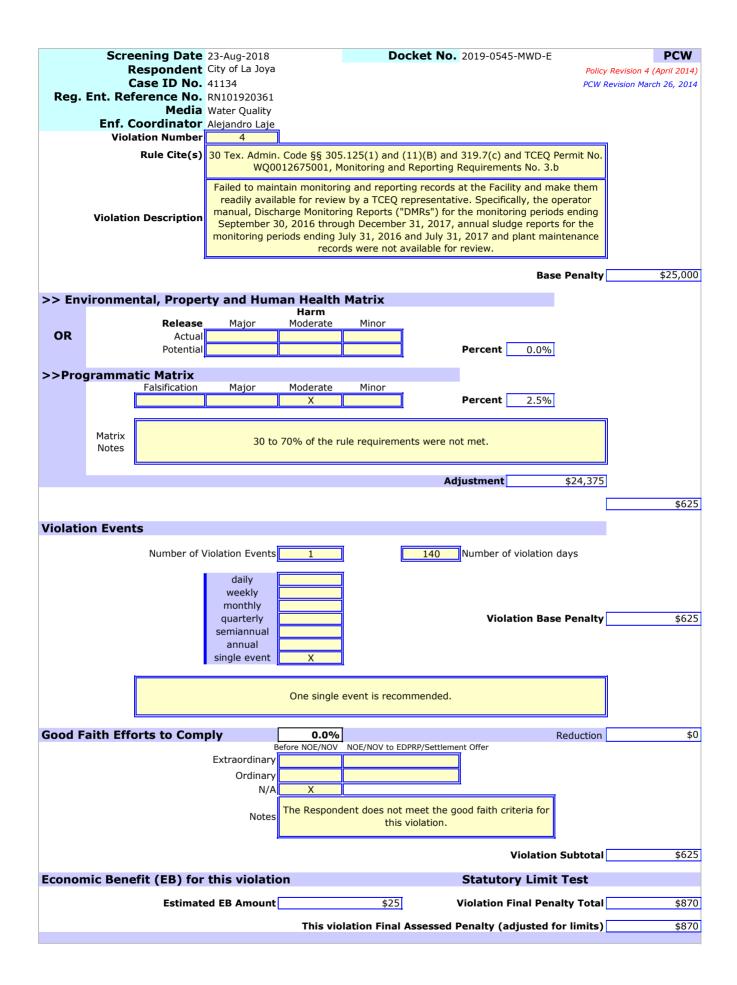
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Joya	I					
Case ID No.							
Reg. Ent. Reference No.							
	Water Quality						Years of
						<b>Percent Interest</b>	Depreciation
Violation No.	. 1						
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs							
				0.00	\$0	n/a	\$0
Other (as needed)	\$1,000,000	31-Jan-2012	22-Jul-2020	0.00 8.48	\$0 \$423,973	n/a n/a	\$0 \$423,973
				8.48	\$423,973	n/a	\$423,973
	Estimated cos	st to determine th	e cause of none	8.48 complia	\$423,973 nce and make any	n/a necessary repairs/a	\$423,973
Other (as needed)	Estimated cos	st to determine th	e cause of none the end date of	8.48 complia the firs	\$423,973 nce and make any	n/a	\$423,973
Other (as needed) Notes for DELAYED costs	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs ed date	\$423,973 nce and make any it month of noncor of compliance.	n/a necessary repairs/a npliance and the fin	\$423,973 adjustments to al date is the
Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs ed date	\$423,973 nce and make any it month of noncor of compliance. item (except for	n/a necessary repairs/a npliance and the fin r one-time avoide	\$423,973 adjustments to al date is the d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs ed date tering 0.00	\$423,973 nce and make any it month of noncor of compliance. item (except for \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0	\$423,973 adjustments to al date is the d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs ed date tering 0.00 0.00	\$423,973 nce and make any it month of noncor of compliance. item (except for \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs ed date tering 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r one-time avoide \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs ed date 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated cos the Facility.	st to determine th Date required is	ne cause of none the end date of estimate	8.48 complia the firs d date 0.00 0.00 0.00 0.00 0.00 0.00	\$423,973 nce and make any t month of noncor of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a necessary repairs/a npliance and the fin r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$423,973 adjustments to al date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	R	ening Date Respondent Case ID No.	City of La Joya		Docket	<b>No.</b> 20	)19-0545-MWD-E		PCW Revision 4 (April 2014) Levision March 26, 2014
Reg.	Enf. C	oordinator	Water Quality						
	Viola	ation Number Rule Cite(s)	Permit No.	WQ0012675 quirements N	)(1) and 30 Tex. Ad 001, Interim and In Io. 1 and TCEQ Agre D-E, Ordering Provis	iterim I E eed Orde	Effluent Limitation er Docket No. 201	s and	
	Violatio	n Description	Failed to comply	y with the pe	rmitted effluent limi	itations,			¢35.000
							Bas	e Penalty	\$25,000
>> Env	vironme	ntal, Proper	ty and Huma	Harm	Matrix				
OR		<b>Release</b> Actual Potential	Major	Moderate X	Minor	Ре	ercent 15.0%		
>>Prog	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor	Ре	ercent 0.0%		
	Matrix Notes	(5-day) to det <i>coli</i> and tota	ermine whether t I suspended solids significant amour	the discharge s were also e nts of polluta	d to evaluate bioche ed amounts of pollui evaluated. Human h nts which do not ex ital receptors as a r	tants exc ealth or t ceed lev esult of t	ceeded protective the environment vels that are prote	has been	
								[	\$3,750
Violatio	on Event	ts							
		Number of \	/iolation Events	4	12	4 Nu	umber of violation	days	
			daily weekly monthly quarterly semiannual annual single event	X			Violation Bas	e Penalty	\$15,000
		Four month	,		for the monthly mor Ily 2014, and Octob	51	• • • • •	<sup>,</sup> 2012,	
Good F	aith Effo	orts to Com		0.0%				Reduction	\$0
			Extraordinary Ordinary N/A	X	ent does not meet t	the good			
							Violation	Subtotal	\$15,000
Econon	nic Bene	efit (EB) for	this violation	n		St	tatutory Limit	Test	
		Estimate	ed EB Amount		\$0	Vio	lation Final Pen	alty Total	\$20,889
				This viol	lation Final Asses	sed Pen	nalty (adjusted f	or limits)	\$20,889

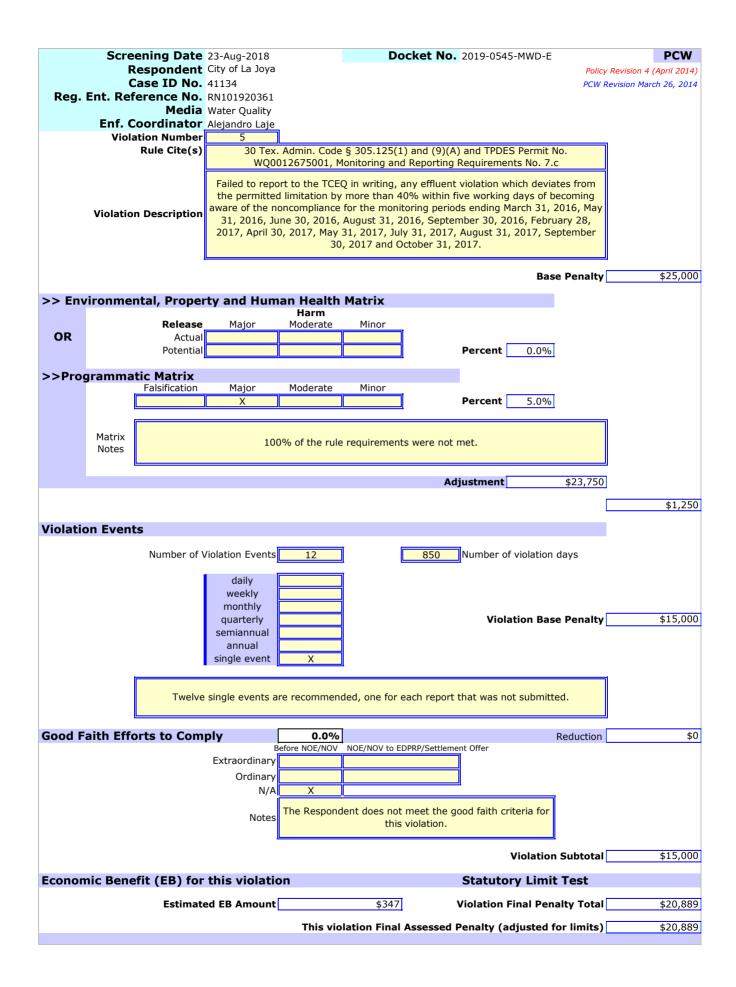
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Jova						
Case ID No.							
Reg. Ent. Reference No.							
-							Years of
	Water Quality					Percent Interest	
Violation No.	2						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	1	n – – – – – – – – – – – – – – – – – – –		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs		the Facility is cap	otured in the Ec	onomic	Benefit Workshee	necessary repairs/a t for Violation No. 1.	
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		\$0			TOTAL		\$0

		ening Date			Do	ocket No.	2019-0545-MWD-E		PCW
		lespondent Case ID No.							Revision 4 (April 2014) Revision March 26, 2014
Reg.	Ent. Ref	erence No.							
	Enf. C	Media Coordinator	Water Quality Alejandro Laje						
		ation Number	3	1					
		Rule Cite(s)					Code § 305.125(1) n I Effluent Limitatio		
				equirements No	os. 1 and 3	and TCEQ A	greed Order Docket		
				0244-1	1WD-E, Orde	ring Provisio	on No. 3.C		
	Violatio	n Description	Failed to com	oly with the pe	rmitted efflu	ent limitatio	ons, as shown in Atta	achment A.	
							Ва	se Penalty	\$25,000
>> Env	vironme	ntal, Proper	ty and Hum	nan Health	Matrix				
		Release	Major	Harm Moderate	Minor				
OR		Actual			X			-	
		Potential					Percent 5.0%	<u>&gt;</u>	
>>Prog	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor	ī	Percent 0.0%	ิง	
						<u> </u>		<u>, , , , , , , , , , , , , , , , , , , </u>	
			Δ simplified mo	del was utilizer	to evaluate	hiochemica	al oxygen demand		
	Matrix	(5-day) to det	ermine whethe	r the discharge	ed amounts o	of pollutants	exceeded protectiv		
	Notes						nan health or the en not exceed levels tl		
				-	•		result of the violati		
						Ad	ljustment	\$23,750	
									\$1,250
Violatio	on Even	te							
Violatio					,		=		
		Number of \	iolation Events	21		1,704	Number of violation	n days	
			daily						
			weekly monthly						
			quarterly	X			Violation Ba	se Penalty	\$26,250
			semiannual						
			annual single event						
									I
		Twenty-one	quarterly event	s are recomm	ended for th	e monthly m	nonitoring periods of	February	
		2012 through	September 20	13, January th	rough June 2	2014, Decer	mber 2014, June 20	15 through	
		Novem	ber 2016, Janu	ary through Se	eptember 20	17, January	2018, and March 20	018.	
Good F	aith Effo	orts to Com		0.0% Before NOE/NOV	NOE/NOV to E	DPRP/Settleme	ent Offer	Reduction	\$0
			Extraordinary	1		,			
			Ordinary				<u>_</u>		
			N/A					T	
			Notes	The Respond		meet the g violation.	ood faith criteria for		
							Malat's		40C 050
Econor	nic Dara	fit (ED) for	this vislat	on				n Subtotal	\$26,250
ECONON	nic bene	efit (EB) for				T	Statutory Lim		
		Estimate	ed EB Amount		\$0		Violation Final Pe	-	\$36,556
				This vio	lation Final	Assessed	Penalty (adjusted	for limits)	\$36,556

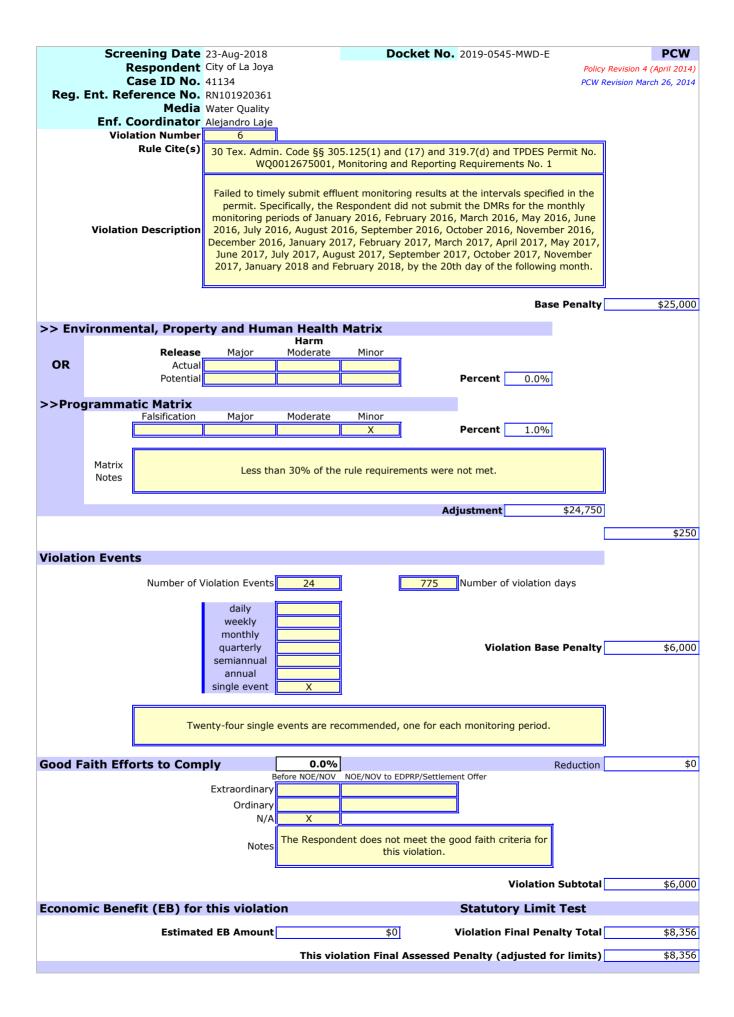
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Jova						
Case ID No.							
Reg. Ent. Reference No.							
-							Years of
	Water Quality					Percent Interest	
Violation No.	3						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	1	n – – – – – – – – – – – – – – – – – – –		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs		the Facility is cap	otured in the Ec	onomic	Benefit Workshee	necessary repairs/a t for Violation No. 1.	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$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		\$0			TOTAL		\$0



	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Jova						
Case ID No.							
Reg. Ent. Reference No.							
							Years of
	Water Quality					<b>Percent Interest</b>	
Violation No.	, 4						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	, 	ı <del></del>		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$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	\$250	5-Apr-2018	13-Apr-2020	2.02	\$25	n/a	\$25
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
<b>•••</b> • • •		Ú			+ 0		
Other (as needed)	Estimated cost	t to update opera	tional procedure	0.00 es and	\$0 conduct employee	n/a training to ensure t	<u>\$0</u> hat all required
Other (as needed) Notes for DELAYED costs	records are	maintained and r	made readily av ies) or five year	es and ailable f s (sludg	conduct employee for review by a TC	training to ensure t EQ representative for required is the initi	hat all required or a period of
Notes for DELAYED costs	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and ailable f s (sludg e is the	conduct employee for review by a TCl ge activities). Date estimated complia	training to ensure t EQ representative for required is the initi ance date.	hat all required or a period of al investigation
	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and ailable f s (sludg e is the	conduct employee for review by a TCl ge activities). Date estimated complia	training to ensure t EQ representative for required is the initi	hat all required or a period of al investigation
Notes for DELAYED costs	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and o ailable f s (sludo e is the <b>tering</b>	conduct employee for review by a TCl ge activities). Date estimated complia item (except for	training to ensure t EQ representative for required is the initi ance date. r one-time avoide	hat all required or a period of al investigation d costs)
Notes for DELAYED costs Avoided Costs Disposal Personnel	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and o ailable f s (sludg e is the tering 0.00	conduct employee for review by a TCl ge activities). Date estimated complia item (except for \$0	training to ensure t EQ representative for required is the initi ance date. r one-time avoide \$0	hat all required or a period of al investigation <b>d costs)</b> \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and g ailable f s (sludg e is the tering 0.00 0.00	conduct employee for review by a TCl ge activities). Date estimated complia item (except for \$0 \$0	training to ensure t EQ representative for required is the initi ance date. r one-time avoide \$0 \$0 \$0 \$0	hat all required or a period of al investigation <b>d costs)</b> \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and o ailable f s (sludg e is the 0.00 0.00 0.00 0.00 0.00	conduct employee for review by a TCl ge activities). Date estimated complia item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	training to ensure t EQ representative for required is the initi ance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	hat all required or a period of al investigation <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and o ailable 1 s (sludg e is the tering 0.00 0.00 0.00 0.00 0.00	conduct employee for review by a TCl ge activities). Date estimated complia item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	training to ensure t EQ representative for required is the initi ance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	hat all required or a period of al investigation \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and o ailable f s (sludg e is the 0.00 0.00 0.00 0.00 0.00	conduct employee for review by a TCl ge activities). Date estimated complia item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	training to ensure t EQ representative for required is the initi ance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	hat all required or a period of al investigation \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	records are three years (n	maintained and r non-sludge activit date a	made readily av ies) or five year and the final dat	es and o ailable 1 s (sludg e is the tering 0.00 0.00 0.00 0.00 0.00	conduct employee for review by a TCl ge activities). Date estimated complia item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	training to ensure t EQ representative for required is the initi ance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	hat all required or a period of al investigation \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



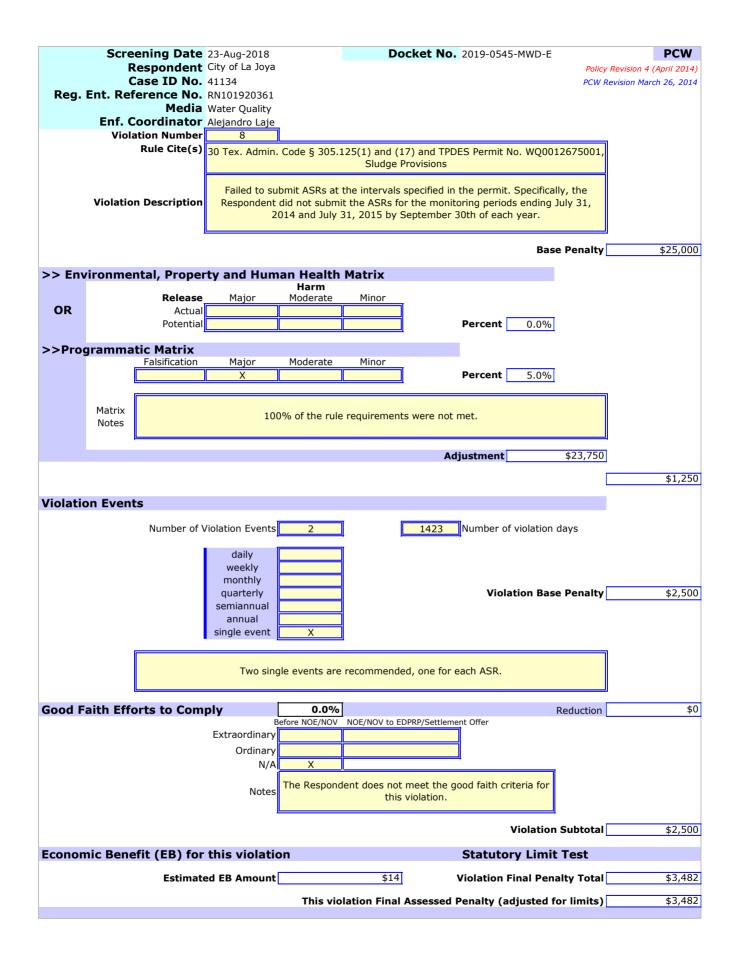
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	41134						
	Water Quality					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs	;	1. <u> </u>			+ 0	L +0	+0
Equipment		<u> </u>		0.00	\$0	\$0	\$0
Buildings Other (as needed)				0.00	<u>\$0</u> \$0	\$0 \$0	<u>\$0</u> \$0
Engineering/Construction		1		0.00	\$0	\$0	<u>\$0</u> \$0
Lingineering/ construction		<u> </u>		0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$250	5-Apr-2018	13-Apr-2020	2.02	\$25	n/a	\$25
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs		j j		0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	certified	d annual sludge re	eports, quarterly s. Date required	/ progre l is the	ess reports, compl	e timely submittal c ete and accurate DN n date and the final o	1Rs, and
Avoided Costs	ANNU/	LIZE avoided c	osts before en	tering	item (except for	r one-time avoide	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel		<u> </u>		0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling		{ <b></b>		0.00	\$0	\$0	\$0
Supplies/Equipment		{		0.00	\$0	\$0 \$0	<b>#</b> 0
Electric de la company de la				0.00	\$0		\$0
Financial Assurance	\$311	25-Nov-2017	23-Aug-2018		¢11		\$0
<b>ONE-TIME</b> avoided costs	\$311	25-Nov-2017	23-Aug-2018	0.74	\$11 \$0	\$311	\$0 \$322
				0.74	\$0	\$311 \$0	\$0 \$322 \$0
<b>ONE-TIME</b> avoided costs	Estimated limitation by r of becoming accrued cost	cost to report in more than 40% to g aware of the nor s and interest of t	writing any efflu o the Regional O ncompliance (\$2 ten prior periods	0.74 0.00 Ient vio Office ar 5 per r 5 plus t	\$0 lation which devia nd the Enforcemen notification x 12 m ne item cost of the	\$311	\$0 \$322 \$0 ed effluent working days including the equired is the



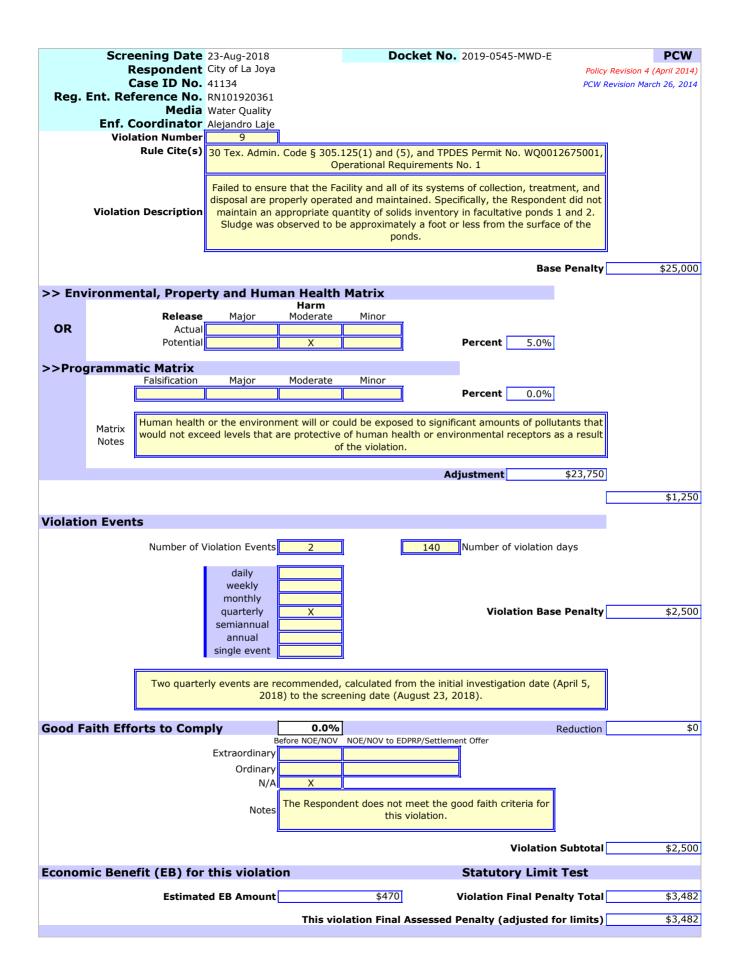
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Joya						
Case ID No.	41134						
Reg. Ent. Reference No.	RN101920361						
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	all monitorin complete	g and self-reportine and accurate DM	ng procedures a IRs is captured	are prop in the I	erly accomplished Economic Benefit V	t employee training , including the time Vorksheet for Violat	y submittal of ion No. 5.
Avoided Costs	ANNUA	LIZE avoided co	osts before er			r one-time avoide	
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		\$0			TOTAL		\$0

	Scre	ening Date	23-Aug-2018		Do	cket No. 2019-0545-MWD-E		PCW
		•	City of La Joya				Policy	Revision 4 (April 2014)
_		Case ID No.					PCW R	evision March 26, 2014
Reg.	Ent. Rei		RN101920361					
	Enf (		Water Quality					
		ation Number	Alejandro Laje 7	1				
	101	Rule Cite(s)		I				
				. Code § 305.1	25(1) and (1 Sludge P	7) and TPDES Permit No. WQ00: rovisions	12675001,	
	Violatio	n Description	the permit. Sp	ecifically, the	Respondent d	orts ("ASRs") at the intervals sp id not submit the ASRs for the n ., 2017 by September 30th of ea	nonitoring	\$25,000
>> Env	vironme	ntal, Propei	rty and Hum	an Health	Matrix	Das	erenary	\$23,000
				Harm				
00		Release	Major	Moderate	Minor			
OR		Actual Potential				Percent 0.0%		
		Fotential			I			
>>Prog	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor			
					X	Percent 1.0%		
	Matrix Notes		Less the	an 30% of the	rule requiren	nents were not met.		
						Adjustment	\$24,750	
							г	\$250
							L	\$230
Violatio	on Even	ts						
		Number of \	violation Events	2		467 Number of violation	days	
			daily weekly monthly quarterly semiannual annual single event			Violation Bas	e Penalty	\$500
			Two sing	gle events are	recommende	d, one for each ASR.		
Good F	aith Effe	orts to Com		0.0%			Reduction	\$0
			Extraordinary	Before NOE/NOV	NOE/NOV to ED	PRP/Settlement Offer		
			Ordinary					
			N/A	X				
			Notes	The Respond		meet the good faith criteria for violation.		
						Violation	Subtotal	\$500
Econon	nic Bene	efit (EB) for	this violation	on		Statutory Limit	Test	
		Fetimat	ed EB Amount		\$3	Violation Final Pen	alty Total	\$696
		LSUIIIdu						<u>م</u> ومغ
				This vio	lation Final	Assessed Penalty (adjusted f	or limits)	\$696

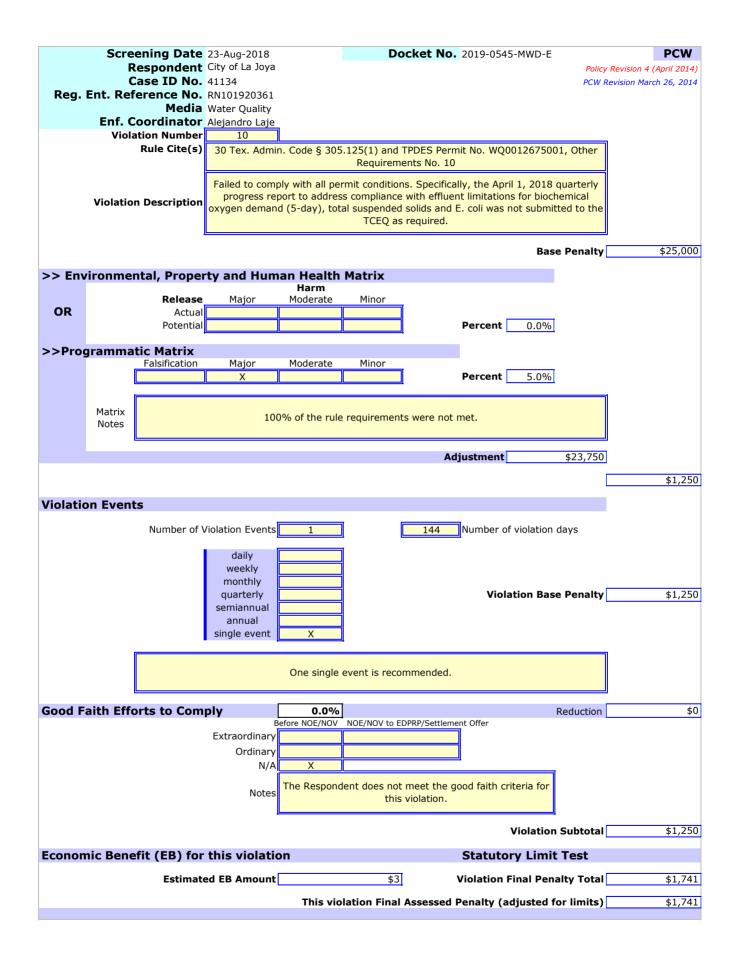
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Jova						
Case ID No.							
Reg. Ent. Reference No.							
<b>J</b>	Water Quality						Years of
	· · ·					<b>Percent Interest</b>	
Violation No.	/						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$50	30-Sep-2016			\$3	n/a	\$3
	Ectimated at						
						July 2016 and July	
	each missing	g report x 2). Da	te required is th	e date	the first annual slu	udge report was due	and the final
Notos for DELAYED sosts	each missing date is the	g report x 2). Da compliance date.	te required is th Estimated cost	e date to upda	the first annual slu ate the Facility's or	udge report was due perational guidance	and the final and conduct
Notes for DELAYED costs	each missing date is the	g report x 2). Da compliance date.	te required is th Estimated cost	e date to upda	the first annual slu ate the Facility's or	udge report was due	and the final and conduct
Notes for DELAYED costs	each missing date is the employee tra	g report x 2). Da compliance date. ining to ensure th	te required is th Estimated cost nat all self-repor	e date to upda ting red	the first annual slu ate the Facility's of quirements are pro	udge report was due perational guidance	and the final and conduct , including the
Notes for DELAYED costs	each missing date is the employee tra	g report x 2). Da compliance date. ining to ensure th	te required is th Estimated cost nat all self-repor and certified an	e date to upda ting rea nual slu	the first annual slu ate the Facility's of quirements are pro	udge report was due perational guidance operly accomplished	and the final and conduct , including the
Notes for DELAYED costs	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to upda ting rec nual slu et for V	the first annual slu ate the Facility's op quirements are pro udge reports is cap Violation No. 5.	udge report was due perational guidance operly accomplished	and the final and conduct , including the nic Benefit
	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to upda ting rec nual slu et for V	the first annual slu ate the Facility's op quirements are pro udge reports is cap Violation No. 5.	udge report was due perational guidance operly accomplished otured in the Econor	and the final and conduct , including the nic Benefit
Avoided Costs	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to upda ting red nual slu et for V tering	the first annual slu ate the Facility's og quirements are pro udge reports is cap /iolation No. 5. item (except for	idge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0	and the final and conduct , including the nic Benefit d costs) \$0 \$0
Avoided Costs Disposal Personnel	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to upda ting rec nual slu et for V tering 0.00 0.00 0.00	the first annual slu ate the Facility's or guirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0	and the final and conduct , including the nic Benefit d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to upda ting rec nual slu et for V tering 0.00 0.00 0.00 0.00	the first annual slu ate the Facility's of quirements are pro- udge reports is cap <u>fiolation No. 5.</u> item (except for \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to upda ting rec nual slu eet for V tering 0.00 0.00 0.00 0.00 0.00	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	udge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to updating reconcilent for version of the second s	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to upda ting rec nual slu eet for V tering 0.00 0.00 0.00 0.00 0.00	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	udge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to updating reconcilent for version of the second s	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to updating reconcilent for version of the second s	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to updating reconcilent for version of the second s	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to updating reconcilent for version of the second s	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to updating reconcilent for version of the second s	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	each missing date is the employee tra timely su	g report x 2). Da compliance date. ining to ensure th bmittal of signed	te required is th Estimated cost nat all self-repor and certified an Workshe	e date to updating reconcilent for version of the second s	the first annual slu ate the Facility's of quirements are pro- udge reports is cap (iolation No. 5. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	adge report was due perational guidance operly accomplished otured in the Econor r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	and the final and conduct , including the nic Benefit \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	WO	rksheet		
Respondent	City of La Joya	1					
Case ID No.	41134						
leg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment	ir		1	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	sludge repor	t was due and the	(\$25 for each m e final date is th	5.54 hissing r e estim	\$14 eport x 2). Date r ated compliance d	n/a required is the date ate. Estimated cost	\$14 the first annua to update the
	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 hissing r e estim ployee t ly subm : Benefit	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and Worksheet for Vir	n/a required is the date ate. Estimated cost that all self-reportin l certified annual slu olation No. 5.	\$14 the first annua to update the og requirements udge reports is
Other (as needed)	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 hissing r e estim ployee t ly subm : Benefit	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and Worksheet for Vir	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu	\$14 the first annua to update the og requirements udge reports is
Other (as needed) Notes for DELAYED costs	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 hissing r e estim ployee t ly subm Benefit tering 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and tworksheet for Vi- item (except for \$0	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu olation No. 5. r one-time avoide \$0	\$14 the first annua to update the g requirements udge reports is <b>d costs)</b> \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 hissing r e estim ployee t ly subm : Benefit tering 0.00 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and tworksheet for Vic item (except for \$0 \$0	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu olation No. 5. r one-time avoide \$0 \$0	\$14 the first annua to update the g requirements udge reports is <b>d costs)</b> \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 hissing r e estim ployee t ly subm Benefit Benefit 0.00 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and Worksheet for Vir item (except for \$0 \$0 \$0	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu olation No. 5. r <b>one-time avoide</b> \$0 \$0 \$0	\$14 the first annua to update the g requirements idge reports is <b>d costs)</b> \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 issing r e estim ployee t ly subm : Benefit tering 0.00 0.00 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and : Worksheet for Vir item (except for \$0 \$0 \$0 \$0	n/a equired is the date ate. Estimated cost that all self-reportin certified annual slu olation No. 5. r one-time avoide \$0 \$0 \$0 \$0	\$14 the first annua to update the og requirements udge reports is d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 issing r e estim ployee t ly subm : Benefit tering 0.00 0.00 0.00 0.00 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and Worksheet for Vir item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu plation No. 5. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$14 the first annua to update the grequirements udge reports is d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 issing r e estim ployee t ly subm : Benefit 0.00 0.00 0.00 0.00 0.00 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and worksheet for Vir item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu olation No. 5. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$14 the first annua to update the og requirements udge reports is d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 issing r e estim ployee t ly subm : Benefit tering 0.00 0.00 0.00 0.00 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and Worksheet for Vir item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu plation No. 5. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$14 the first annua to update the og requirements udge reports is d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated cost sludge repor Facility's opera are properly	t to submit ASRs t was due and the ational guidance a accomplished, ind captured	(\$25 for each m e final date is th and conduct em cluding the time in the Economic	5.54 issing r e estim ployee t ly subm : Benefit 0.00 0.00 0.00 0.00 0.00 0.00	\$14 eport x 2). Date r ated compliance d raining to ensure ittal of signed and worksheet for Vir item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a required is the date ate. Estimated cost that all self-reportin certified annual slu olation No. 5. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$14 the first annua to update the grequirements udge reports is d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



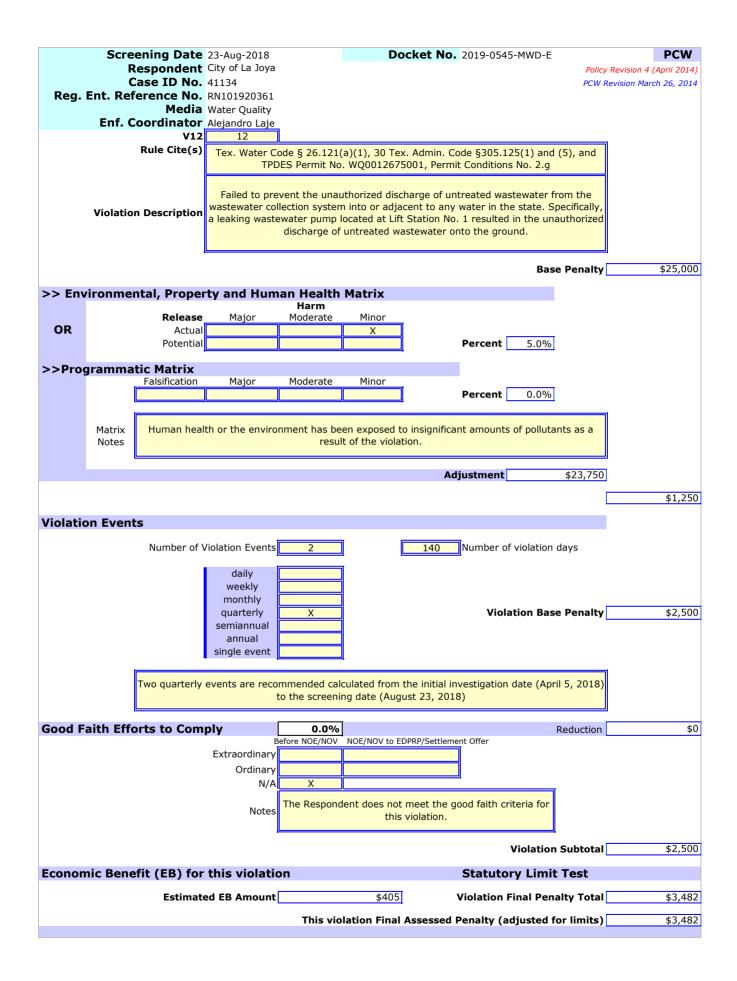
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Joya						
Case ID No.							
Reg. Ent. Reference No.	RN101920361						
Media	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
-							
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	±1.000	E Ann 2010	12 4 2020	0.00	\$0	n/a	\$0
Training/Sampling	\$1,000 \$3,500	5-Apr-2018 5-Apr-2018	13-Apr-2020 13-May-2020	2.02	\$101	n/a	\$101
Remediation/Disposal Permit Costs	\$3,500	5-Apr-2016	13-May-2020	2.11	\$369 \$0	n/a n/a	\$369 \$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	required is th	e initial investiga	tion date and th	ne final	date is the estimat	nagement plan at th ted date of compliar as sludge from facult	ice. Estimated
	and 2. Date re	equired is the initi	al investigation	date ar	nd the final date is	the estimated date	of compliance.
Avoided Costs Disposal	ANNUA		USIS DEIDIE EI				
Personnel				0.00	\$0 \$0	\$0 \$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		\$4,500			TOTAL		\$470



	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Joya						
Case ID No.	41134						
Reg. Ent. Reference No.	RN101920361						
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
						5.0	. 15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		Bute Required	That Dute				LD / Miloune
Item Description							
Delayed Costs							
Equipment	( <u> </u>			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$25	1-Apr-2018	13-Apr-2020	2.04	\$3	n/a	\$3
Notes for DELAYED costs	limitations for	biochemical oxyg	en demand (5-o	day), to	tal suspended soli	address compliance ds and <i>E. coli.</i> Date d date of compliance	required is the
Avoided Costs	ANNU/	LIZE avoided c	osts before en	tering	item (except for	r one-time avoide	d 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		\$25			TOTAL		\$3

		ening Date		Docket No. 2019-0545-MWD-E	PCW
		lespondent Case ID No.	City of La Joya		Revision 4 (April 2014)
Reg.			RN101920361	PCW R	evision March 26, 2014
		Media	Water Quality		
		Coordinator	Alejandro Laje		
	VIOI	Rule Cite(s)			
			30 Tex. Admin. Code § 3	05.125(1) and (5), and TPDES Permit No. WQ0012675001, Operational Requirements No. 1	l.
				e facility and all of its systems of collection, treatment, and	
	Violatio	n Description		erated and maintained. Specifically, the aerator in the final erational and extensive algal growth was present resulting	
			in l	bright green wastewater in the pond.	
				Base Penalty	\$25,000
>> Env	vironme	ntal, Propei	rty and Human Heal		
		Release	Harm Major Moderat		
OR		Actual			
		Potential	X	<b>Percent</b> 5.0%	
>>Prog	gramma	tic Matrix	Maian Madauat	Minou	
		Falsification	Major Moderat	e Minor Percent 0.0%	
			n <u> </u>		
	Matrix			r could be exposed to significant amounts of pollutants that ive of human health or environmental receptors as a result	
	Notes	would not exe		of the violation.	
				Adjustment \$23,750	
				, <b>La jus</b> tinent <u>420,700</u>	¢1.250
				L	\$1,250
Violatio	on Event	ts			
		Number of \	/iolation Events 2	140 Number of violation days	
			daily		
			weekly		
			monthly quarterly X	Violation Base Penalty	\$2,500
			semiannual		<i>\_\</i>
			annual single event		
			Single event		
		Two quarte		led, calculated from the initial investigation date (April 5,	
			2018) to the s	creening date (August 23, 2018).	
Good Fa	aith Effo	orts to Com	ply 0.0	1% Reduction	\$0
			Before NOE/N Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A X		
			Notes The Resp	ondent does not meet the good faith criteria for	
			Notes	this violation.	
				Violation Subtotal	\$2,500
Econor	nic Porc	fit (EB) for	this violation	Statutory Limit Test	
LCOHOR	ne bene				
		Estimate	ed EB Amount	\$737 Violation Final Penalty Total	\$3,482
			This	violation Final Assessed Penalty (adjusted for limits)	\$3,482

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of La Joya	1					
Case ID No.	41134						
Reg. Ent. Reference No.							
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
violation No.	11					БО	
						5.0	1
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	\$5,000	5-Apr-2018	13-May-2020	2.11	\$35	\$702	\$737
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
	Estimated cos	st to repair or rep	lace the aerator	0.00	\$0 \$0		\$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs	are present i	in the pond. Date	required is the dat	0.00 0.00 in the initial ir e of cor	\$0 \$0 final storage pond ivestigation date a mpliance.	n/a n/a and ensure that no nd the final date is	\$0 \$0 algal growths the estimated
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	are present i	in the pond. Date	required is the dat	0.00 0.00 in the initial ir e of cor <b>tering</b>	\$0 \$0 final storage pond ivestigation date a npliance. item (except for	n/a n/a and ensure that no ind the final date is r one-time avoided	\$0 \$0 algal growths the estimated d costs)
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal	are present i	in the pond. Date	required is the dat	0.00 0.00 in the initial ir e of cor <b>tering</b> 0.00	\$0 \$0 final storage pond ivestigation date a mpliance. item (except for \$0	n/a n/a and ensure that no nd the final date is r one-time avoide \$0	\$0 \$0 algal growths the estimated d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	are present i	in the pond. Date	required is the dat	0.00 0.00 initial ir e of cou tering 0.00 0.00	\$0 \$0 final storage pond vestigation date a npliance. item (except for \$0 \$0	n/a n/a and ensure that no nd the final date is r <b>one-time avoide</b> \$0 \$0	\$0 \$0 algal growths the estimated d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	are present i	in the pond. Date	required is the dat	0.00 0.00 initial ir e of cou tering 0.00 0.00	\$0 \$0 final storage pond vestigation date a npliance. item (except for \$0 \$0 \$0	n/a n/a and ensure that no ind the final date is r one-time avoide \$0 \$0 \$0	\$0 \$0 algal growths the estimated d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	are present i	in the pond. Date	required is the dat	0.00 0.00 in the initial ir e of cor tering 0.00 0.00 0.00 0.00	\$0 \$0 final storage pond vestigation date a npliance. item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a and ensure that no ind the final date is r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 algal growths the estimated d costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	are present i	in the pond. Date	required is the dat	0.00 0.00 0.00 0.00 e of cor tering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 final storage pond vestigation date a npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a and ensure that no ind the final date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 algal growths the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	are present i	in the pond. Date	required is the dat	0.00 0.00 0.00 0.00 <b>tering</b> 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 final storage pond vestigation date a npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a and ensure that no nd the final date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 algal growths the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	are present i	in the pond. Date	required is the dat	0.00 0.00 0.00 0.00 e of cor tering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 final storage pond vestigation date a npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a and ensure that no ind the final date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 algal growths the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	are present i	in the pond. Date	required is the dat	0.00 0.00 0.00 0.00 <b>tering</b> 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 final storage pond vestigation date a npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a and ensure that no nd the final date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 algal growths the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	41134						
	Water Quality					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	i .						
Delayed Costs				3		-	
Equipment	\$2,500	5-Apr-2018	13-Apr-2020	2.02	\$17	\$337	\$354
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	\$500	5-Apr-2018	13-Apr-2020	0.00	<u>\$0</u> \$51	n/a	<u>\$0</u> \$51
Remediation/Disposal Permit Costs	\$500	5-Apr-2016	13-Apr-2020	0.00	\$0	n/a n/a	<u>\$51</u> \$0
Other (as needed)				0.00 the lea	\$0 Iking wastewater p	n/a pump located at Lift	\$0 Station No. 1.
Other (as needed) Notes for DELAYED costs	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	the lea e and t and dis Date r imated	\$0 king wastewater p he final date is the sinfect the affecteo equired is the initi date of complianc	n/a pump located at Lift e estimated date of d area and properly al investigation date e.	\$0 Station No. 1. compliance. dispose of the and the final
Other (as needed) Notes for DELAYED costs Avoided Costs	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	the lea e and t and dis Date r imated	\$0 king wastewater p he final date is the sinfect the affecteo equired is the initi date of complianc item (except for	n/a pump located at Lift e estimated date of d area and properly al investigation date e. r one-time avoide	\$0 Station No. 1. compliance. dispose of the e and the final d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	the lead e and t and dis Date r imated 0.00	\$0 king wastewater p he final date is the sinfect the affected equired is the initi date of complianc item (except for \$0	n/a pump located at Lift e estimated date of of d area and properly al investigation date re. r one-time avoide \$0	\$0 Station No. 1. compliance. dispose of the e and the final d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	the lea e and t and dis Date r imated tering 0.00	\$0 king wastewater p he final date is the sinfect the affected equired is the initi date of complianc item (except for \$0 \$0	n/a pump located at Lift e estimated date of of a rea and properly al investigation date e. r one-time avoide \$0 \$0	\$0 Station No. 1. compliance. dispose of the e and the final d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	0.00 the lea e and t and dis Date r imated 0.00 0.00 0.00	\$0 king wastewater p he final date is the sinfect the affected equired is the initi date of complianc <b>item (except for</b> \$0 \$0 \$0	n/a pump located at Lift e estimated date of of d area and properly al investigation date e. r one-time avoide \$0 \$0 \$0	\$0 Station No. 1. compliance. dispose of the and the final d costs) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	0.00 the lea e and t and dis Date r imated 0.00 0.00 0.00 0.00	\$0 king wastewater p he final date is the infect the affected equired is the initi date of complianc item (except for \$0 \$0 \$0 \$0	n/a pump located at Lift e estimated date of of a rea and properly al investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 Station No. 1. compliance. dispose of the and the final d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	0.00 the lea e and t and dis Date r imated 0.00 0.00 0.00 0.00 0.00	\$0 king wastewater p he final date is the sinfect the affecteor equired is the initi date of complianc item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a pump located at Lift e estimated date of of a rea and properly al investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 Station No. 1. compliance. dispose of the and the final and the final \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	0.00 the lead e and t and dis Date r imated 0.00 0.00 0.00 0.00 0.00 0.00	\$0 king wastewater p he final date is the sinfect the affected equired is the initi date of complianc item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a pump located at Lift e estimated date of of a rea and properly al investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 Station No. 1. compliance. dispose of the and the final d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Date requi Estimated Re untreated wa	red is the initial in mediation/Dispos astewater from Li	nvestigation dat sal cost to clean ft Station No. 1 date is the est	0.00 the lea e and t and dis Date r imated 0.00 0.00 0.00 0.00 0.00	\$0 king wastewater p he final date is the sinfect the affecteor equired is the initi date of complianc item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a pump located at Lift e estimated date of of d area and properly al investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 Station No. 1. compliance. dispose of the e and the final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

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 CN600704639, RN101920361, Rating Year 2019 which includes Compliance History (CH) components from September 1, 2014, through August 31, 2019.

Customer, Respondent, or Owner/Operator:	CN600704639, City of La Joya	<b>Classification:</b> SATISFACTORY	<b>Rating:</b> 6.19
<b>Regulated Entity:</b>	RN101920361, CITY OF LA JOYA	Classification: SATISFACTORY	<b>Rating:</b> 3.10
<b>Complexity Points:</b>	9	Repeat Violator: NO	
CH Group:	08 - Sewage Treatment Facilities		
Location:	Approximately 1.5 miles south-southwest Road 2521 in Hidalgo County, Texas 7856		lighway 83 and Farm-to-Market
TCEQ Region:	REGION 15 - HARLINGEN		
ID Number(s): WASTEWATER PERMIT WQC WASTEWATER AUTHORIZAT		TEWATER EPA ID TX0127337	
Compliance History Peri	od: September 01, 2014 to August 31, 2	019 Rating Year: 2019 R	ating Date: 09/01/2019
Date Compliance Histor	y Report Prepared: October 14, 201	9	
Agency Decision Requir	ing Compliance History: Enforceme	ent	
Component Period Selec	cted: October 14, 2014 to October 14, 2	2019	
TCEQ Staff Member to C	ontact for Additional Information	Regarding This Compliance Hi	story.
Name: Alejandro Laje		Phone: (512) 239-2547	
Site and Owner/Oper	ator History:		
,	nce and/or operation for the full five-year c change in ownership/operator of the site d		ES O

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

- A. Final Orders, court judgments, and consent decrees: N/A
- B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	February 26, 2016	(1327082)
Item 2	March 23, 2016	(1333876)
Item 5	January 18, 2018	(1502687)
Item 6	January 15, 2019	(1565882)

#### 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		1/2018 (1543519) YES 2D TWC Chapter 26, SubChapter A 26.121 30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	5(1)	Moderate
2		0/2018 (1547224) YES 2D TWC Chapter 26, SubChapter A 26.1210 30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	5(1)	Moderate
3		1/2019 (1601512) YES 2D TWC Chapter 26, SubChapter A 26.121( 30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	5(1)	Moderate
4		8/2019 (1601513) YES 2D TWC Chapter 26, SubChapter A 26.121( 30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	5(1)	Moderate
5		1/2019 (1573876) YES 2D TWC Chapter 26, SubChapter A 26.121( 30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	5(1)	Moderate
6		0/2019 (1587340) YES 2D TWC Chapter 26, SubChapter A 26.121 30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	5(1)	Moderate
7		8/2019 (1554447) NO 30 TAC Chapter 305, SubChapter F 305.12 30 TAC Chapter 317 317.4(c) Operational Regs, No. 5 REPMIT	Classification: 5(1)	Minor
	Description:	Operational Reqs. No. 5 PERMIT Failure to provide a means for measuring fl present; however, the effluent electronic to		
	Self Report? I Citation: Description:	"0.000". NO 30 TAC Chapter 317 317.4(a)(8) Failure to provide adequate backflow preve Specifically, Lift Station Numbers 1 and 3 fa		
	Self Report? I Citation:	tests conducted on April 1, 2019. NO 2D TWC Chapter 26, SubChapter A 26.1210 30 TAC Chapter 305, SubChapter F 305.12 30 TAC Chapter 305, SubChapter F 305.12 Operational Reqs. No. 1 PERMIT Permit Conditions No. 2(g) PERMIT	5(1)	Moderate
	Description: Self Report?	Failure to prevent the unauthorized dischar collection system into or adjacent to water wastewater pump located at Lift Station Nu discharge of an unknown amount of untrea NO	in the state. Spec Imber 2 resulted in	ifically, a leaking n the unauthorized
	Citation: Description:	30 TAC Chapter 317 317.3(e)(5) Failure to provide all lift stations with an au light and horn). Specifically, Lift Station Nu operable visual alarm.	idiovisual alarm sy mber 5 was not e	ystem (red flashing quipped with an
	Self Report? I Citation:	NO 30 TAC Chapter 317 317.3(a)	Classification:	Minor
	Description:	Failure to enclose a lift station in an intrude	er-resistant manne	er with controlled
		Page 2		

access. Specifically, the intruder-resistant fencing at Lift Station Number 5
required repair as the three strands of barbed wire along the top of the fencing
were rusted and broken, horizontal posts were bent and rusted, and chain-link
fencing needed replacement.

8	Date: 06/ Self Report?	/30/2019 (1595246) YES (	Classification:	Moderate
	Citation: Description:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125( Failure to meet the limit for one or more perr	1)	
	Description.			
9	Date: 07/ Self Report? Citation: Description:	31/2019(1601514)YES(0)2D TWC Chapter 26, SubChapter A 26.121(a)30 TAC Chapter 305, SubChapter F 305.125(Failure to meet the limit for one or more perr	1)	Moderate
10	Date: 09/	(12/2019 (1602630)		
	Self Report? Citation:			Moderate
	Description: Self Report? Citation:	NO ( 30 TAC Chapter 305, SubChapter F 305.125( 30 TAC Chapter 305, SubChapter F 305.125(		Moderate
	Description: Self Report? Citation:	30 TAC Chapter 305, SubChapter F 305.125( 30 TAC Chapter 305, SubChapter F 305.125(		Moderate
	Description: Self Report? Citation:	30 TAC Chapter 305, SubChapter F 305.125( 30 TAC Chapter 305, SubChapter F 305.125(	,	Moderate
	Description: Self Report? Citation:	30 TAC Chapter 305, SubChapter F 305.125( 30 TAC Chapter 305, SubChapter F 305.125(		Moderate
	Description: Self Report? Citation: Description:	NON-RPT VIOS FOR MONIT PER OR PIPE NO C 30 TAC Chapter 305, SubChapter F 305.125( 30 TAC Chapter 305, SubChapter F 305.125( NON-RPT VIOS FOR MONIT PER OR PIPE		Moderate

#### F. Environmental audits:

N/A

- G. Type of environmental management systems (EMSs): N/A
- H. Voluntary on-site compliance assessment dates: N/A
- I. Participation in a voluntary pollution reduction program: N/A
- J. Early compliance: N/A

Sites Outside of Texas:

N/A

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



§

§

§

S

#### IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING CITY OF LA JOYA; RN101920361

BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

### AGREED ORDER

#### DOCKET NO. 2019-0545-MWD-E

On \_\_\_\_\_\_\_, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of La Joya ("Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, represented by the Litigation Division, and Respondent presented this Order to the Commission.

Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, to request an evidentiary hearing, receive notice of an evidentiary hearing, and a right to appeal. By entering into this Order, Respondent agrees to waive all notice and procedural rights which might otherwise be authorized or required in this action.

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 Respondent.

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

#### FINDINGS OF FACT

- 1. Respondent owns and operates a wastewater treatment facility located approximately 1.5 miles south-southwest of the intersection of United States Highway 83 and Farm-to-Market Road 2521 in Hidalgo County (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 commenced on April 5, 2018, an investigator documented that Respondent:
  - a. Failed to comply with the permitted effluent limitations, as shown in Attachment "A";
  - b. Failed to comply with the permitted effluent limitations, as shown in Attachment "A";
  - c. Failed to comply with the permitted effluent limitations, as shown in Attachment "A";
  - d. Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative. Specifically, the operator manual, Discharge Monitoring Reports ("DMRs") for the monitoring periods ending September 30, 2016 through December 31, 2017, annual sludge reports for the monitoring periods ending July 31, 2016 and July 31, 2017 and plant maintenance records were not available for review;
  - e. Failed to report to the TCEQ in writing, any effluent violation which deviates from the permitted limitation by more than 40% within five working days of becoming

aware of the noncompliance for the monitoring periods ending March 31, 2016, May 31, 2016, June 30, 2016, August 31, 2016, September 30, 2016, February 28, 2017, April 30, 2017, May 31, 2017, July 31, 2017, August 31, 2017, September 30, 2017, and October 31, 2017;

- f. Failed to timely submit effluent monitoring results at the intervals specified in the permit. Specifically, Respondent did not submit the DMRs for the monthly monitoring periods of January 2016, February 2016, March 2016, May 2016, June 2016, July 2016, August 2016, September 2016, October 2016, November 2016, December 2016, January 2017, February 2017, March 2017, April 2017, May 2017, June 2017, July 2017, August 2017, September 2017, October 2017, November 2017, January 2018, and February 2018, by the 20<sup>th</sup> day of the following month;
- g. Failed to timely submit annual sludge reports ("ASRs") at the intervals specified in the permit. Specifically, Respondent did not submit the ASRs for the monitoring periods ending July 31, 2016 and July 31, 2017 by September 30<sup>th</sup> of each year;
- h. Failed to submit ASRs at the intervals specified in the permit. Specifically, Respondent did not submit the ASRs for the monitoring periods ending July 31, 2014 and July 31, 2015 by September 30<sup>th</sup> of each year;
- i. Failed to ensure that the Facility and all its systems of collection, treatment, and disposal are properly operated and maintained. Specifically, Respondent did not maintain an appropriate quantity of solids inventory in facultative ponds 1 and 2. Sludge was observed to be approximately a foot or less from the surface of the ponds;
- j. Failed to comply with all permit conditions. Specifically, the April 1, 2018 quarterly progress report to address compliance with effluent limitations for biochemical oxygen demand (5-day), total suspended solids and *E. coli* was not submitted to the TCEQ as required;
- k. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the aerator in the final storage pond was not operational and extensive algal growth was present resulting in bright green wastewater in the pond; and
- Failed to prevent the unauthorized discharge of untreated wastewater from the wastewater collection system into or adjacent to any water in the state.
   Specifically, a leaking wastewater pump located at Lift Station No. 1 resulted in the unauthorized discharge of untreated wastewater onto the ground.
- 3. The Executive Director recognizes that Respondent implemented the following corrective measures at the Facility:
  - a. Submitted the DMRs for the monthly monitoring periods of January 2016, February 2016, March 2016, May 2016, June 2016, July 2016, August 2016, September 2016, October 2016, November 2016, December 2016, January 2017, February 2017, March 2017, April 2017, May 2017, June 2017, July 2017, August 2017, September 2017, October 2017, November 2017, January 2018, and February 2018, by April 5, 2018; and
  - b. Submitted the ASRs for the monitoring periods ending July 31, 2016 and July 31, 2017, on January 10, 2018.

#### CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, 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., Respondent failed to comply with the permitted effluent limitations, as shown in Attachment "A," in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0012675001, Interim and Interim I Effluent Limitations and Monitoring Requirements Nos. 1 and 3, and TCEQ Agreed Order Docket No. 2011-0244-MWD-E, Ordering Provision No. 3.c.
- 3. As evidenced by Finding of Fact No. 2.b., Respondent failed to comply with the permitted effluent limitations, as shown in Attachment "A," in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), TPDES Permit No. WQ0012675001, Interim and Interim I Effluent Limitations and Monitoring Requirements No. 1, and TCEQ Agreed Order Docket No. 2011-0244-MWD-E, Ordering Provision No. 3.c.
- 4. As evidenced by Finding of Fact No. 2.c., Respondent failed to comply with the permitted effluent limitations, as shown in Attachment "A," in violation of Tex. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), TPDES Permit No. WQ0012675001, Interim and Interim I Effluent Limitations and Monitoring Requirements Nos. 1 and 3, and TCEQ Agreed Order Docket No. 2011-0244-MWD-E, Ordering Provision No. 3.c.
- 5. As evidenced by Finding of Fact No. 2.d., Respondent failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and (11)(B) and 319.7(c) and TCEQ Permit No. WQ0012675001, Monitoring and Reporting Requirements No. 3.b.
- 6. As evidenced by Finding of Fact No. 2.e., Respondent failed to report to the TCEQ in writing, any effluent violation which deviates from the permitted limitation by more than 40% within five working days of becoming aware of the noncompliance for the monitoring periods, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (9)(A) and TPDES Permit No. WQ0012675001, Monitoring and Reporting Requirements No. 7.c.
- 7. As evidenced by Finding of Fact No. 2.f., Respondent failed to timely submit effluent monitoring results at the intervals specified in the permit, in violation of 30 TEX. ADMIN CODE §§ 305.125(1) and (17) and 319.7(d) and TPDES Permit No. WQ0012675001, Monitoring and Reporting Requirements No. 1.
- 8. As evidenced by Finding of Fact No. 2.g., Respondent failed to timely submit ASRs at the intervals specified in the permit, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and (17) and TPDES Permit No. WQ0012675001, Sludge Provisions.
- 9. As evidenced by Finding of Fact No. 2.h., Respondent failed to submit ASRs at the intervals specified in the permit, in violation of 30 Tex. ADMIN CODE § 305.125(1) and (17) and TPDES Permit No. WQ0012675001, Sludge Provisions.
- 10. As evidenced by Finding of Fact No. 2.i., Respondent failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0012675001, Operational Requirements No. 1.
- 11. As evidenced by Finding of Fact No. 2.j., Respondent failed to comply with all permit conditions, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0012675001, Other Requirements No. 10.
- 12. As evidenced by Finding of Fact No. 2.k., Respondent failed to ensure that the Facility and all of its system of collection, treatment, and disposal are properly operated and maintained, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0012675001, Operational Requirements No. 1.
- 13. As evidenced by Finding of Fact No. 2.l., Respondent failed to prevent the unauthorized discharge of untreated wastewater from the wastewater collection system 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 (5), and TPDES Permit No. WQ0012675001, Permit Conditions No. 2.g.

- 14. Pursuant to TEX. WATER CODE § 7.051, TCEQ has the authority to assess an administrative penalty against Respondent for violations of state statutes within TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 15. An administrative penalty in the amount of two hundred eighteen thousand eight hundred twelve dollars (\$218,812.00) 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 Revenue Operations Section of TCEQ's Financial Administration Division reviewed the financial documentation submitted by Respondent and determined that Respondent is unable to pay all or part of the penalty and qualifies for a deferral of all or part of the penalty under Tex. WATER CODE § 7.034. Therefore, two hundred eighteen thousand eight hundred twelve dollars (\$218,812.00) of the penalty is deferred contingent upon Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions contained in this Order.

#### **ORDERING PROVISIONS**

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

1. Respondent is assessed an administrative penalty as set forth in Conclusion of Law No. 15 for violations of state statutes and rules of the TCEQ. The payment of this penalty and Respondent's compliance with all 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 which are not raised here. Penalty payments shall be made payable to TCEQ and shall be sent with the notation "Re: City of La Joya, Docket No. 2019-0545-MWD-E" to:

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

- 2. Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Order:
    - i. Update operational procedures and conduct employee training to ensure that all required records are maintained and made readily available for review by a TCEQ representative, including the operator manual and maintenance records and all self-reporting requirements are properly accomplished, including the timely submittal of signed and certified ASRs, quarterly progress reports, complete and accurate DMRs, and noncompliance notifications;
    - ii. Submit the ASRs for the monitoring periods ending July 31, 2014 and July 31, 2015;
    - iii. Submit the April 1, 2018 quarterly progress report to address compliance with effluent limitations for biochemical oxygen demand (5-day), total suspended solids and *E. coli*;
    - iv. Develop and implement a solids management plan at the Facility;

- v. Repair or replace the leaking wastewater pump located at Lift Station No. 1; and
- vi. Clean and disinfect the affected area and properly dispose of the untreated wastewater from Lift Station No. 1.
- b. Within 45 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 2.h, to demonstrate compliance with Ordering Provision Nos. 2.a.i through 2.a.vi.
- c. Within 60 days after the effective date of this Order, repair or replace the aerator in the final storage pond and ensure that no algal growths are present in the pond.
- d. Within 75 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 2.h, to demonstrate compliance with Ordering Provision No. 2.c.
- e. Within 130 days after the effective date of this Order, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0012675001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported DMRs, demonstrating at least three consecutive months of compliance with all permitted effluent limitations. The written certification shall be submitted in accordance with Ordering Provision No. 2.h.
- f. Within 180 days after the effective date of this Order, remove and properly dispose of the excess sludge from facultative ponds 1 and 2.
- g. Within 195 days after the effective date of this Order, submit written certification, in accordance with Ordering Provision No. 2.h. to demonstrate compliance with Ordering Provision No. 2.f.
- h. The certifications required by these Ordering Provisions shall be accompanied by detailed supporting documentation, including photographs, receipts, and/or other records, shall be signed by 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 fine and imprisonment for knowing violations."

The written certifications and supporting documentation necessary to demonstrate compliance with these Ordering Provisions shall be sent to:

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

and:

Water Section Manager Harlingen Regional Office Texas Commission on Environmental Quality 1804 West Jefferson Avenue Harlingen, Texas 78550-5247

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 Respondent. 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. 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 Respondent shall be made in writing to the Executive Director. Extensions are not effective until 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 Enforcement Division at the address listed above.
- 6. If 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, Respondent's failure to comply is not a violation of this Order. Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Respondent shall notify the Executive Director within seven days after Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 7. This Order, issued by the Commission, shall not be admissible against Respondent in a civil proceeding, unless the proceeding is brought by the Office of the Attorney General of the State of Texas ("OAG") to: (1) enforce the terms of this Order, or (2) pursue violations of a statute within TCEQ's jurisdiction, or of a rule adopted or an order or permit issued by TCEQ under such a statute. The Executive Director may, without further notice or hearing, refer this matter to the OAG for further enforcement proceedings if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions in this Order.
- 8. 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.
- 9. 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.
- 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.

City of La Joya Docket No. 2019-0545-MWD-E Page 7

#### SIGNATURE PAGE

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

For the Executive Director

3/27/23

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 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;
- 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, I understand that any falsification of any compliance documents may result in cximinal prosecution.

On

Signature – Isidro Casanova, Mayor City of La Joya P.O. Box H La Joya, Texas 78560

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

Attachment A Effluent Violation Table

## City of La Joya Attachment A Docket No. 2019-0545-MWD-E Effluent Violation Table

	Biochemica	l Oxygen Den	and (5-day)	Escheri	Escherichia coli		p	рН		Total Suspended Solids	
Month- Year	Daily Average Conc.	Daily Average Loading	Single Grab Conc.	Daily Average Conc.	Single Grab Conc.	Daily Average	Monthly Minimum	Monthly Maximum	Daily Average Conc.	Daily Average Loading	
	Limit = 30 mg/l	Limit = 88 lbs/d	Limit = 100 mg/l	Limit = 126 CFU	Limit = 399* CFU	Limit = 0.35 MGD	Limit = 6 SU	Limit = 9 SU	Limit = 90 mg/l	Limit = 263 lbs/d	
Jan-2012	47	97	с	860	1,203	с	с	с	с	с	
Feb-2012	50	100	с	405	649	с	с	с	104	с	
Mar-2012	46	93	с	С	с	с	с	с	113	с	
Apr-2012	40	с	с	С	с	с	с	с	99	с	
May-2012	48	с	с	С	с	с	с	с	145	с	
Jun-2012	59	110	с	С	с	с	с	с	171	320	
Jul-2012	47	92	с	с	с	с	с	с	190	366	
Aug-2012	58	119	с	С	с	с	5.6	9.1	257	528	
Sep-2012	49	95	с	С	с	с	с	с	217	421	
Oct-2012	47	92	с	с	с	с	с	с	182	357	
Nov-2012	37	с	с	С	с	с	с	с	98	с	
Dec-2012	50	97	с	С	с	с	с	с	104	с	
Jan-2013	57	107	с	с	с	с	с	с	103	с	
Feb-2013	62	110	с	С	с	с	с	с	133	с	
Mar-2013	65	114	с	С	с	с	с	с	179	314	
Apr-2013	49	92	с	с	с	с	с	с	163	288	
May-2013	57	95	с	С	с	с	с	с	144	с	
Jun-2013	55	с	с	С	с	с	с	с	155	с	
Jul-2013	55	93	с	С	с	с	с	с	168	269	

## City of La Joya Attachment A Page 2

	Biochemica	l Oxygen Dem	and (5-day)	Escheri	chia coli	Flow	p	Н	Total Suspended Solids	
Month- Year	Daily Average Conc.	Daily Average Loading	Single Grab Conc.	Daily Average Conc.	Single Grab Conc.	Daily Average	Monthly Minimum	Monthly Maximum	Daily Average Conc.	Daily Average Loading
	Limit = 30 mg/l	Limit = 88 lbs/d	Limit = 100 mg/l	Limit = 126 CFU	Limit = 399* CFU	Limit = 0.35 MGD	Limit = 6 SU	Limit = 9 SU	Limit = 90 mg/l	Limit = 263 lbs/d
Aug-2013	51	с	с	320	517	с	с	с	168	с
Sep-2013	56	с	с	с	с	с	с	9.1	148	с
Oct-2013	59	153	с	787	1,414	с	с	с	127	304
Nov-2013	54	256	с	с	с	0.569	с	с	108	517
Dec-2013	39	206	с	3,757	7,241	0.796	с	с	с	с
Jan-2014	63	с	с	156	с	с	с	с	с	с
Feb-2014	49	с	с	с	с	с	с	с	с	с
Mar-2014	44	с	с	с	с	с	с	с	с	с
Apr-2014	35	с	с	с	с	с	с	с	99	с
May-2014	35	с	с	с	с	с	с	с	120	с
Jun-2014	38	с	с	с	с	с	с	9.1	141	291
Jul-2014	36	110.1	с	1,404	3,255	с	с	с	126	368
Aug-2014	41	140.8	с	с	с	403	с	с	130	441
Sep-2014	36	139	с	656.5	1,012	454	NR	NR	136	515
Oct-2014	32	125.8	с	с	с	0.463	с	9.2	111	429
Dec-2014	С	с	с	С	c	0.49	c	NR	122	500
Jan-2015	35	163.3	с	1,270.3	2,419.6	0.552	с	с	134	621
Feb-2015	с	125.6	с	с	с	0.625	с	9.4	с	281
Mar-2015	32	175.2	с	999.4	1,986	0.71	с	с	с	421
Apr-2015	33	227.9	с	446	866	0.821	с	с	110	757
	Biochemical Oxygen Demand (5-day)			chia coli	Flow	р	H	Total Suspe	ended Solids	

## City of La Joya Attachment A Page 3

Month- Year	Daily Average Conc.	Daily Average Loading	Single Grab Conc.	Daily Average Conc.	Single Grab Conc.	Daily Average	Monthly Minimum	Monthly Maximum	Daily Average Conc.	Daily Average Loading
Ital	Limit = 30 mg/l	Limit = 88 lbs/d	Limit = 100 mg/l	Limit = 126 CFU	Limit = 399* CFU	Limit = 0.35 MGD	Limit = 6 SU	Limit = 9 SU	Limit = 90 mg/l	Limit = 263 lbs/d
May-2015	41	314	с	с	с	0.916	с	9.8	162	1247
Jun-2015	39	111	с	с	с	с	с	9.3	146	428
Jul-2015	43	с	с	с	с	с	с	9.2	158	с
Aug-2015	42	с	с	181	с	С	с	9.3	143	с
Sep-2015	41	с	с	с	с	С	с	9.3	143	с
Oct-2015	39	с	с	с	с	с	с	с	С	с
Nov-2015	С	с	с	291.5	с	с	с	с	С	с
Dec-2015	с	с	с	429.5	686.7	с	с	с	с	с
Mar-2016	С	с	с	202.3	с	С	с	с	С	с
Apr-2016	41.2	с	с	с	с	с	с	с	94.2	с
May-2016	38.7	с	с	319	с	с	с	с	118.7	с
Jun-2016	40	с	с	258	с	с	с	с	150	285.5
Jul-2016	35	с	с	с	с	с	с	с	116	с
Aug-2016	33	с	с	с	с	с	с	с	161	с
Sep-2016	37	с	с	298.3	с	с	с	с	154	с
Oct-2016	С	с	с	с	с	с	с	с	97	с
Nov-2016	С	с	с	с	с	с	с	с	96	с
Jan-2017	34	с	с	с	с	с	с	с	с	с
Feb-2017	46	с	с	с	с	с	с	88	с	с
Mar-2017	38	с	c	c	с	с	с	c	108	с
Apr-2017	56	с	106	162	с	с	с	с	121	с
May-2017	40	с	с	c	с	с	с	с	147	с
June-2017	с	с	c	c	с	с	с	с	113	с
Jul-2017	36	с	с	331.6	648.6	с	с	с	128	с
Aug-2017	44	292	с	с	с	с	с	с	128	1,435
	Biochemical Oxygen Demand (5-day)			Escheri	chia coli	Flow	р	Н	Total Suspe	ended Solids

## City of La Joya Attachment A Page 4

Month- Year	Daily Average Conc.	Daily Average Loading	Single Grab Conc.	Daily Average Conc.	Single Grab Conc.	Daily Average	Monthly Minimum	Monthly Maximum	Daily Average Conc.	Daily Average Loading
	Limit = 30 mg/l	Limit = 88 lbs/d	Limit = 100 mg/l	Limit = 126 CFU	Limit = 399* CFU	Limit = 0.35 MGD	Limit = 6 SU	Limit = 9 SU	Limit = 90 mg/l	Limit = 263 lbs/d
Sep-2017	36	с	с	с	с	с	с	87	116	с
Oct-2017	с	с	с	1,334.3	2,419.6	С	с	с	с	с
Jan-2018	с	с	с	172.9	с	с	с	с	с	с
Feb-2018	70	с	190	296.8	517.2	с	с	с	116	с
Mar-2018	с	с	с	344.9	686.7	с	с	с	с	с

Conc. = Concentration

mg/l = milligrams per liter lbs/d = pounds per day

CFU = colony forming units MGD = million gallons per day SU = standard units

c = compliant \* = 394 (prior to Jan 2014) NR = not received