**Order Type:** 1660 Agreed Order **Findings Order Justification:** N/A Media: **MWD Small Business:** No Location(s) Where Violation(s) Occurred: City of Seadrift WWTF, 101 South Orange Street, City of Seadrift, Calhoun County **Type of Operation:** Wastewater treatment facility **Other Significant Matters:** Additional Pending Enforcement Actions: No Past-Due Penalties: No Other: N/A **Interested Third-Parties: None** Texas Register Publication Date: August 13, 2021 **Comments Received:** No

# **Penalty Information**

Total Penalty Assessed: \$54,865 Amount Deferred for Expedited Settlement: \$10,973 Total Paid to General Revenue: \$0 Total Due to General Revenue: \$0 Payment Plan: N/A Supplemental Environmental Project ("SEP") Conditional Offset: \$43,892 Name of SEP: WWTP Outfall Improvements (Compliance) Compliance History Classifications: Person/CN - Satisfactory Site/RN - Satisfactory Major Source: No Statutory Limit Adjustment: N/A Applicable Penalty Policy: April 2014

# Investigation Information

**Complaint Date(s):** N/A **Complaint Information**: N/A **Date(s) of Investigation:** February 11, 2020 **Date(s) of NOE(s):** May 29, 2020

# **Violation Information**

1. Failed to take all reasonable steps to minimize or prevent any discharge or sludge use or disposal or other permit violation that has a reasonable likelihood of adversely affecting human health or the environment. Specifically, an accumulation of sludge was observed in the receiving ditch and around the outfall discharge pipe [30 TEX. ADMIN. CODE § 305.125(1) and (4), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010822001, Permit Conditions No. 2.d].

2. Failed to conduct sample collection according to the recommended sampling and testing methods. Specifically, the Facility was not collecting bacteria samples directly into the appropriate sample container [30 TEX. ADMIN. CODE § 319.11(a) and (b)].

3. Failed to report to the TCEQ in writing, any effluent violation which deviates from the permitted effluent limitation by more than 40% within five working days of becoming aware of noncompliance. Specifically, the Respondent did not provide noncompliance notifications for the exceedances during the monthly monitoring periods of February 2019 and September 2019 [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010822001, Monitoring and Reporting Requirements No. 7.c].

4. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the clarifier center ring contained an accumulation of floating scum; floating solids and sludge were observed at the clarifier weirs; an uneven flow was observed over the clarifier weirs; and the handrails and grating at the aeration basin and clarifier were heavily corroded. Additionally, dissolved oxygen concentrations of 0.70 milligrams per liter ("mg/L") in the aeration basin and 0.25 mg/L in the re-aeration basin did not meet the recommended minimum concentration of 2.0 mg/L; and the 30 minute settleable solids concentration of 98% in the aeration basin did not meet the recommended concentration of between 10% and 50% [30 TEX. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0010822001, Operational Requirements No. 1].

5. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. Specifically, audio alarms were not installed at the 2nd/Bay, Grape/Pine and Orange/Dallas lift stations; the Harbor/Pine and Harbor/Main lift stations were not secured by a fence; the wet wells at the Harbor/Main and Grape/Pine lift stations were 80% covered with solids; and the Orange/Dallas and Grape/Pine lift stations were not secured from unauthorized access [30 TEX. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0010822001, Operational Requirements No. 1].

6. Failed to have automatic flow measuring devices accurately calibrated by a trained person at plant start-up and thereafter not less often than annually. Specifically, calibration records indicated that the totalizer flow meter was not calibrated between February 2, 2018 and February 7, 2020 [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010822001, Monitoring and Reporting Requirements No. 5].

7. Failed to comply with recommended sampling and testing methods. Specifically, the low-range standards used for chlorine equipment calibration were expired and the Facility was not keeping calibration records for the equipment used for total chlorine residual analysis [30 TEX. ADMIN. CODE § 319.11(c)].

8. Failed to maintain records for each measurement or sample taken. Specifically, the time of analysis for dissolved oxygen, pH, and total chlorine residual were not being properly recorded for each individual parameter [30 TEX. ADMIN. CODE § 319.7(a)].

9. Failed to ensure the Facility and all of it's systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the ventilation fans in the chlorination and dechlorination rooms were not operational [30 TEX. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0010822001, Operational Requirements No. 1].

10. Failed to prevent an unauthorized discharge of sewage into or adjacent to any water in the State. Specifically, on October 1, 2018 and October 16, 2018, two unauthorized discharges totaling 150 gallons of sewage occurred from the 3rd/Dallas lift station [30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0010822001, Permit Conditions No. 2(g)].

11. Failed to assure the quality of all measurements through the use of blanks, standards, duplicates, and spikes. Specifically, duplicate analysis was not being performed on a 10% basis each day that dissolved oxygen samples are analyzed [30 TEX. ADMIN. CODE §§ 305.125(1) and 319.6 and TPDES Permit No. WQ0010822001, Monitoring and Reporting Requirements No. 1].

# **Corrective Actions/Technical Requirements**

# **Corrective Action(s) Completed:**

The Respondent implemented the following corrective measures:

a. On October 16, 2018, located and sealed infiltration to the collection system, replaced the manhole cover near the 3rd/Dallas lift station, removed and properly disposed of the sewage, and disinfected the affected area;

b. On February 7, 2020, calibrated the totalizer flow meter;

c. On February 18, 2020, purchased and utilized new low-range standards for chlorine equipment calibration and maintained calibration records for total chlorine residual;

d. On February 19, 2020, repaired/replaced the ventilation fans in the chlorination and dechlorination rooms;

e. On February 27, 2020, installed an audio alarm at the Orange/Dallas lift station, secured the Harbor/Pine and Harbor/Main lift stations with fencing, cleaned the wet wells at the Harbor/Main and Grape/Pine lift stations, and secured the Orange/Dallas and Grape/Pine lift stations from unauthorized access; and

f. On February 27, 2020, updated the Facility's operational guidance and conducted employee training to ensure that the time of analysis for dissolved oxygen, pH, and total chlorine residual is properly recorded for each individual parameter; and duplicates are being used to provide the minimum quality assurance requirements for the analysis of dissolved oxygen.

# **Technical Requirements:**

1. The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).

2. The Order will also require the Respondent to:

a. Within 30 days:

i. Determine the cause of the discharges of sludge and make necessary repairs / adjustments to minimize or prevent any discharge of sludge into the receiving stream;

ii. Remove and properly dispose of the sludge from the receiving stream;

iii. Update operational procedures and conduct employee training to ensure that bacteria samples are collected directly into the appropriate sample container, and noncompliance notifications for any effluent violation which deviates from the permitted effluent limitation by more than 40% is provided within five working days of becoming aware of noncompliance;

iv. Remove the accumulation of floating scum, floating solids and sludge in the clarifier and maintain an even flow over the clarifier weirs; and

v. Install operational audio alarms at the 2nd/Bay and Grape/Pine lift stations;

b. Within 45 days, submit written certification to demonstrate compliance with a.

c. Within 60 days:

i. Repair/replace the heavily corroded handrails and grating at the aeration basin and clarifier; and

ii. Ensure that the 30-minute settleable solids concentration in the aeration basin is maintained at the recommended concentration of between 10% and 50%; and the dissolved oxygen concentrations in the aeration basin and the re-aeration basin meet recommended minimum concentration of 2.0 mg/L.

d. Within 75 days, submit written certification to demonstrate compliance with c.

# **Contact Information**

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Alejandro Laje, Enforcement Division, Enforcement Team 3, MC 219, (512) 239-2547; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548
TCEQ SEP Coordinator: Betty Sanders, SEP Coordinator, Litigation Division, MC 173, (512) 239-3992
Respondent: The Honorable Elmer DeForest, Mayor, City of Seadrift, P.O. Box 159, Seadrift, Texas 77983
Respondent's Attorney: N/A

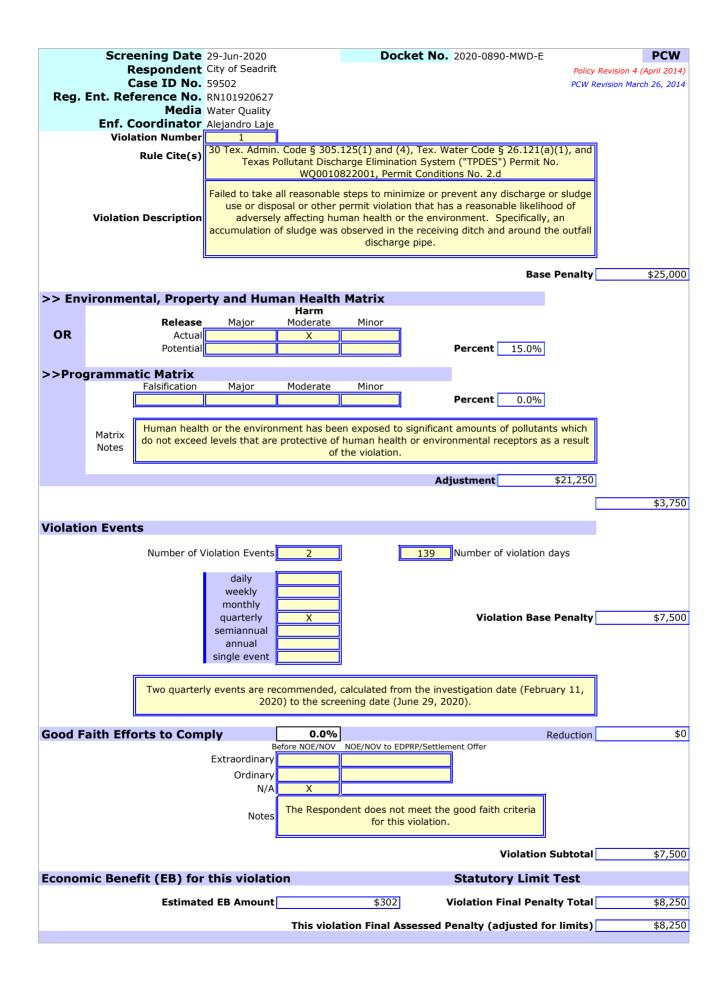
COMMENT	Policy R	Pe Revision 4 (April 2014	-	alculatior	n Worksh	ieet (PC		Revision March	n 26, 2014
DATES	Assigned	1-Jun-2020							
	PCW	14-Oct-2020	Screening	29-Jun-2020	EPA Due				
RESPO	NDENT/FACILI	TY INFORMATI	ON						
	Respondent	City of Seadrift							
	g. Ent. Ref. No.								
Facili	ty/Site Region	14-Corpus Chris	ti		Major/M	inor Source	Minor		
CASE I	NFORMATION								
En	f./Case ID No.				No. a	of Violations			
		2020-0890-MWE	р-Е			Order Type			
мес	lia Program(s) Multi-Media	• /			Government	•	Yes Alejandro Laje	<u>,</u>	
	Multi-Meula				LIII.		Enforcement 1		
Adr	nin. Penalty \$ I	Limit Minimum	\$0	Maximum	\$25,000				
			Develt		ion Contin				
				y Calculat		DU			
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation	base penalt	ies)		Subtotal 1	4	\$55,500
ADJU	STMENTS (+	/-) TO SUBT	OTAL 1						
	Subtotals 2-7 are of	ptained by multiplying		, , ,	, ,				
	Compliance Hi	story		10.0%	Adjustment	Subto	tals 2, 3, & 7		\$5,550
	Notes	Enhancemer	nt for two mo	nths of self-repo	orted effluent vi	iolations.			
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Nataa	The De	anandant daa	a not most the	oulpobility orito				
	Notes	пе ке	spondent doe	es not meet the	culpability crite	ria.			
							1		
	Good Faith Eff	ort to Comply T	otal Adjustn	nents			Subtotal 5		-\$6,185
	Economic Ben				Enhancement*		Subtotal 6		\$0
	Estimated	Total EB Amounts Cost of Compliance	\$1,505 \$26,751	*Capped	l at the Total EB \$ A	Amount			
	Estimated		\$20,751	L					
SUM (	OF SUBTOTA	LS 1-7				F	inal Subtotal	\$	54,865
		AS JUSTICE N I Subtotal by the indi			0.0%		Adjustment		\$0
Reduces			cated percentage				]		
	Notes								
						Final Pen	alty Amount	\$	54,865
STAT		T ADJUSTME	ит			Einal Acco	ssed Penalty	4	54,865
SIAN			••			Fillal ASSE	sseu Penalty	4	.54,005
DEFE	RRAL				20.0%	Reduction	Adjustment	-\$	\$10,973
		enalty by the indicate	d percentage.				1	·	
	Nu								
	Notes	l	Jererral offere	ed for expedited	settiement.				
							1		
PAYA	BLE PENALT	Y						\$	\$43,892

Enf. Coordinator Alejandro Laje			
Compliance History Worksheet			
>> Compliance History Site Enhancement (Subtotal 2)			
Component Number of	Number	Adjust.	
Written notices of violation ("NOVs") with same or similar violations as those in NOVs the current enforcement action ( <i>number of NOVs meeting criteria</i> )	י 2	10%	
Other written NOVs	0	0%	
Any agreed final enforcement orders containing a denial of liability ( <i>number of</i> orders meeting criteria )	0	0%	
Orders Any adjudicated final enforcement orders, agreed final enforcement order without a denial of liability, or default orders of this state or the federa government, or any final prohibitory emergency orders issued by the commission		0%	
Any non-adjudicated final court judgments or consent decrees containing denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> ) and Consent		0%	
Decrees Any adjudicated final court judgments and default judgments, or non adjudicated final court judgments or consent decrees without a denial o liability, of this state or the federal government		0%	
Convictions Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	f 0	0%	
Emissions Chronic excessive emissions events ( <i>number of events</i> )	0	0%	
Letters notifying the executive director of an intended audit conducted unde the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		0%	
Disclosures of violations under the Texas Environmental, Health, and Safet Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)		0%	
		1	
Environmental management systems in place for one year or more	No	0%	
Voluntary on-site compliance assessments conducted by the executive directo Other	r No	0%	
Participation in a voluntary pollution reduction program	No	0%	
Early compliance with, or offer of a product that meets future state or federa government environmental requirements	l No	0%	
Adjustment Pe	rcentage (Sub	ototal 2) [	10%
>> Repeat Violator (Subtotal 3)           No         Adjustment Per	rcentage (Sub	ototal 3)	0%
>> Compliance History Person Classification (Subtotal 7)			
Satisfactory Performer Adjustment Pe	rcentage (Sub	ototal 7)	0%
>> Compliance History Summary			
Compliance History Notes	;. 		
Total Compliance History Adjustment Percentage ( >> Final Compliance History Adjustment	Subtotals 2,	3, & 7) [	10%
Final Adjustment Percent	tage *capped	at 100%	10%

#### Screening Date 29-Jun-2020 Respondent City of Seadrift **Case ID No.** 59502 Reg. Ent. Reference No. RN101920627 Media Water Quality Enf. Coordinator Alejandro Laje

**Docket No.** 2020-0890-MWD-E

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



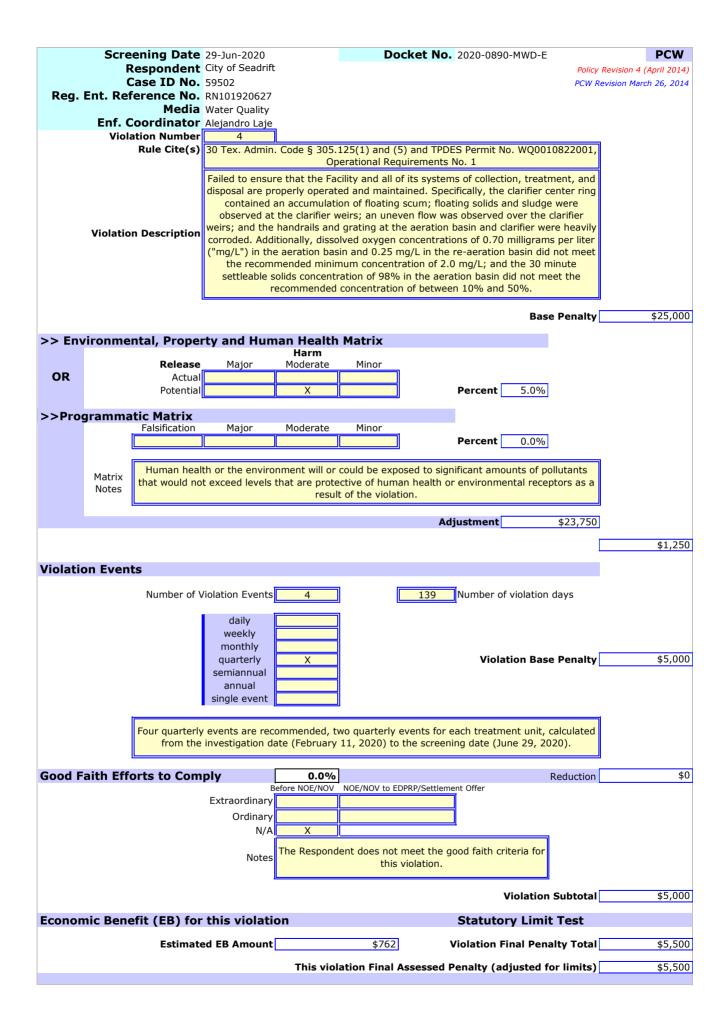
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	59502	t					
5	Water Quality					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs	;			-			
Equipment				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	\$2,500	11-Feb-2020	27-Apr-2021	1.21	\$151	n/a	\$151
Permit Costs Other (as needed)	\$2,500	11-Feb-2020		0.00	\$0	n/a	\$0
	Estimat	ed Other cost to	determine the c		5	<u>n/a</u> sludge and make n grae of sludge into t	,
Notes for DELAYED costs	Estimat repairs/adj stream. Dat	ed Other cost to justments to the ce required is the st to remove and	determine the c Facility to minim investigation da properly dispos	ause of nize or p ate and e of the	the discharges of prevent any discha the final date is th sludge from the r	sludge and make n irge of sludge into t e estimated date of receiving stream. Da	ecessary he receiving f compliance. ate required is
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Avoided Costs	Estimat repairs/adj stream. Dat Estmated cos	ed Other cost to justments to the ce required is the st to remove and the investigatior	determine the c Facility to minin investigation da properly dispos n date and the f	ause of nize or p ate and e of the inal date	the discharges of prevent any discha the final date is th sludge from the r e is the estimated item (except for	sludge and make n irge of sludge into t e estimated date of ecciving stream. Da date of compliance. r one-time avoide	ecessary he receiving f compliance. ate required is d costs)
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Avoided Costs Disposal Personnel	Estimat repairs/adj stream. Dat Estmated cos	ed Other cost to justments to the ce required is the st to remove and the investigatior	determine the c Facility to minin investigation da properly dispos n date and the f	ause of nize or p ate and e of the inal date tering 0.00	the discharges of prevent any discha the final date is th sludge from the r e is the estimated item (except for \$0	sludge and make n irge of sludge into t ie estimated date of receiving stream. Da date of compliance. r one-time avoide \$0	ecessary he receiving f compliance. ate required is d costs) \$0
Avoided Costs Disposal Personnel	Estimat repairs/adj stream. Dat Estmated cos	ed Other cost to justments to the ce required is the st to remove and the investigatior	determine the c Facility to minin investigation da properly dispos n date and the f	ause of nize or p ate and e of the nal date tering 0.00 0.00	the discharges of prevent any discha the final date is the sludge from the r e is the estimated item (except for \$0 \$0	sludge and make n irge of sludge into the estimated date of receiving stream. Da date of compliance. r one-time avoide \$0 \$0	ecessary he receiving f compliance. ate required is d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimat repairs/adj stream. Dat Estmated cos	ed Other cost to justments to the ce required is the st to remove and the investigatior	determine the c Facility to minin investigation da properly dispos n date and the f	ause of nize or p ate and e of the nal dat tering 0.00 0.00 0.00	the discharges of prevent any dischar the final date is the sludge from the r e is the estimated item (except for \$0 \$0 \$0 \$0 \$0	sludge and make n rge of sludge into the receiving stream. Da date of compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ecessary he receiving f compliance. ate required is d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimat repairs/adj stream. Dat Estmated cos	ed Other cost to justments to the ce required is the st to remove and the investigatior	determine the c Facility to minin investigation da properly dispos n date and the f	e of the nal date and date nal date 0.00 0.00	the discharges of prevent any dischar the final date is the sludge from the r e is the estimated item (except for \$0 \$0 \$0	sludge and make n irge of sludge into the e estimated date of ecceiving stream. Da date of compliance. r one-time avoide \$0 \$0 \$0	ecessary he receiving f compliance. ate required is d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimat repairs/adj stream. Dat Estmated cos	ed Other cost to justments to the ce required is the st to remove and the investigatior	determine the c Facility to minin investigation da properly dispos n date and the f	ause of hize or p ate and e of the nal date tering 0.00 0.00 0.00 0.00 0.00	the discharges of prevent any dischar the final date is the sludge from the r e is the estimated item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sludge and make n rge of sludge into ti receiving stream. Da date of compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ecessary he receiving f compliance. ate required is d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimat repairs/adj stream. Dat Estmated cos	ed Other cost to justments to the ce required is the st to remove and the investigatior	determine the c Facility to minin investigation da properly dispos n date and the f	ause of hize or p ate and e of the nal dat tering 0.00 0.00 0.00 0.00 0.00 0.00	the discharges of prevent any dischar the final date is the sludge from the r e is the estimated item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sludge and make n rge of sludge into ti receiving stream. Da date of compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ecessary he receiving f compliance. ate required is ate requir

		ening Date		Docket N	<b>0.</b> 2020-0890-MWD-E	PCW
		Respondent Case ID No.	City of Seadrift			Policy Revision 4 (April 2014)
Reg.		ference No.				PCW Revision March 26, 2014
		Media	Water Quality			
		Coordinator ation Number				
	VIUI	Rule Cite(s)		Tau Adusta Cada C 210.1	1 ( - )	
			30	Tex. Admin. Code § 319.1	1(a) and (b)	
	Violatio	n Description	testing methods. Sp	ole collection according to t ecifically, the Facility was n ly into the appropriate san	not collecting bacteria sa	
					Base	<b>Penalty</b> \$25,000
>> Env	vironme	ntal, Prope	rty and Human Hea	alth Matrix		
		Release	Harn Major Modera			
OR		Actual				
		Potential		X	Percent 3.0%	
>>Pro	aramma	tic Matrix				
	J	Falsification	Major Modera	ite Minor		
					Percent 0.0%	
	Matrix Notes		t exceed levels that are	or could be exposed to insport of human health result of the violation.		
					Adjustment	\$24,250
						\$750
						\$730
Violati	on Even	ts				
		Number of V	/iolation Events 1	139	Number of violation o	lays
			daily weekly monthly quarterly semiannual annual single event X		Violation Base	Penalty \$750
			One sir	gle event is recommended	1.	
Good F	aith Eff	orts to Com		0%		eduction \$0
			Before NOE/	NOV NOE/NOV to EDPRP/Settle	ement Offer	
			Ordinary		-	
			N/A X			
			Notes The Res	oondent does not meet the this violation.	-	
					Violation	Subtotal \$750
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	Test
			ed EB Amount	\$15	violation Final Pena	
		Loundt				
			This	violation Final Assessed	a Penalty (adjusted fo	r limits) \$825

	Ec	conomic	Benefit	WO	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	59502	t					
	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		1			1	I	
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	\$250	11 E.L. 2020	27 4 2021	0.00	\$0	n/a	\$0
		11-Feb-2020	27-Apr-2021	1.21	\$15	n/a	\$15
Training/Sampling	92JU						
Training/Sampling Remediation/Disposal				0.00	\$0	n/a	\$0
Training/Sampling	Estimated co			0.00 0.00	\$0 \$0	n/a n/a e training to ensure	\$0 \$0 that bacteria
Training/Sampling Remediation/Disposal Permit Costs	Estimated co samples are o any effluent v	collected directly violation which de rking days of bec	into the approp eviates from the coming aware of	0.00 0.00 ries and riate sa permitt	\$0 \$0 I conduct employe mple container, ar ted effluent limitat	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig	\$0 \$0 that bacteria otifications for 0% is provided
Training/Sampling Remediation/Disposal Permit Costs Other (as needed)	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 riate sa permitt noncor e estim	\$0 \$0 d conduct employe mple container, ar ted effluent limitat npliance. Date req ated date of comp	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig	\$0 \$0 that bacteria otifications for 0% is provided ation date and
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 riate sa permitt noncor e estim	\$0 \$0 d conduct employe mple container, ar ted effluent limitat npliance. Date req lated date of comp item (except for \$0	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig iliance r one-time avoide \$0	\$0 \$0 that bacteria otifications for 0% is provided lation date and d costs) \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 riate sa permitt noncor ie estim	\$0 \$0 d conduct employe mple container, ar ted effluent limitat npliance. Date req ated date of comp item (except for	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig iliance r one-time avoide \$0 \$0	\$0 \$0 that bacteria otifications for 0% is provided lation date and <b>d costs)</b> \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 riate sa permitt noncor e estim <b>tering</b> 0.00	\$0 \$0 conduct employe mple container, ar ted effluent limitat npliance. Date req lated date of comp item (except for \$0 \$0 \$0 \$0	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig pliance r one-time avoide \$0 \$0 \$0	\$0 \$0 othat bacteria otifications for 0% is provided ation date and d costs) \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 riate sand permitti noncor e estim 0.00 0.00 0.00	\$0 \$0 a conduct employe mple container, ar ted effluent limitat mpliance. Date req ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig liance r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 that bacteria otifications for 0% is provided ation date and <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 ries and riate sa permitt noncor e estim 0.00 0.00 0.00 0.00 0.00	\$0 \$0 conduct employe mple container, ar ted effluent limitat npliance. Date req ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig liance r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 that bacteria otifications for 0% is provided ation date and d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 d conduct employe mple container, ar ted effluent limitat npliance. Date req ated date of comp <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig liance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 that bacteria otifications for 0% is provided ation date and <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 ries and riate sa permitt noncor e estim 0.00 0.00 0.00 0.00 0.00	\$0 \$0 conduct employe mple container, ar ted effluent limitat npliance. Date req ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig liance r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 that bacteria otifications for 0% is provided ation date and d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co samples are o any effluent v within five wo	collected directly violation which de rking days of bec th	into the approp eviates from the coming aware of e final date is th	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 d conduct employe mple container, ar ted effluent limitat npliance. Date req ated date of comp <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e training to ensure nd noncompliance n ion by more than 40 uired is the investig liance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 that bacteria otifications for 0% is provided ation date and <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date	29-Jun-2020 City of Seadrift	Docket No.	2020-0890-MWD-E	Delier	PCW
		Case ID No.					Revision 4 (April 2014) evision March 26, 2014
Reg.	Ent. Ref	ference No. Media	RN101920627 Water Quality				
	Enf. C	Coordinator	- ,				
	Viola	ation Number	3	305.125(1) and TPDES P		2001	
		Rule Cite(s)		and Reporting Requirer	-	2001,	
			Failed to report to the TCE				
	Violatio	n Description	the permitted effluent lim becoming aware of noncor				
			noncompliance notification	s for the exceedances d	uring the monthly mo	· ·	
			periods or	February 2019 and Sept	tember 2019.		
					Base	e Penalty	\$25,000
>> Env	vironme	ntal, Prope	rty and Human Health	Matrix			
		Release	Harm Major Moderate	Minor			
OR		Actual					
		Potential			Percent 0.0%		
>>Pro	gramma	tic Matrix					
		Falsification	Major Moderate	Minor	Percent 5.0%		
	Matrix		100% of the rule	e requirements were not	mot		
	Notes			requirements were not	met.		
				hΔ	ljustment	\$23,750	
				710	Justilient	<i>423773</i> 0	\$1,250
							\$1,230
Violati	on Even	ts					
		Number of \	/iolation Events 2	460	Number of violation	days	
			daily	1			
			weekly				
			monthly guarterly		Violation Base	e Penaltv	\$2,500
			semiannual				. ,
			annual single event X				
				u 			
		т	wo single events are recomr	nended, one event for ea	ach notice missed.		
Good F	aith Eff	orts to Com	ply 0.0%			Reduction	\$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlem	ent Offer		
			Ordinary				
			N/A X				
			Notes The Respond	lent does not meet the g this violation.	jood faith criteria for		
					\ <i>I</i> ! - 1 - 11	Cubarte	40 F00
						Subtotal	\$2,500
Econor	mic Bene	efit (EB) for	this violation		Statutory Limi	t Test	
		Estimate	ed EB Amount	\$53	Violation Final Pena	alty Total	\$2,750
			This vio	ation Final Assessed I	Penalty (adjusted f	or limits)	\$2,750

	E	conomic	Benefit	Wo	r <b>ksheet</b>		
Respondent	City of Seadrif	ť					
Case ID No.	59502						
Reg. Ent. Reference No.	RN101920627						
Media Violation No.	Water Quality 3					Percent Interest	Years of Depreciation
						5.0	1
	Item Cost	<b>Date Required</b>	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
Permit Costs Other (as needed)				0.00 0.00 cedures	\$0 \$0 and conduct emp		\$0 \$0 sure that
Permit Costs	noncomplianc	ce notifications for 40% is provided	r any effluent vi within five work	0.00 0.00 cedures olation ing days	\$0 \$0 and conduct emp which deviates fro	n/a n/a loyee training to en m the permitted effl ire of noncomplianc	\$0 \$0 sure that uent limitation
Permit Costs Other (as needed)	noncompliand by more than	ce notifications for 40% is provided the	r any effluent vi within five work Economic Bene	0.00 0.00 ocedures olation ing days fit Work	\$0 \$0 and conduct emp which deviates fro s of becoming awa sheet for Violation	n/a n/a loyee training to en m the permitted effl ire of noncomplianc	\$0 \$0 sure that luent limitation e is captured ir
Permit Costs Other (as needed) Notes for DELAYED costs	noncompliand by more than	ce notifications for 40% is provided the	r any effluent vi within five work Economic Bene	0.00 0.00 ocedures olation ing days fit Work	\$0 \$0 and conduct emp which deviates fro s of becoming awa sheet for Violation item (except for \$0	n/a n/a loyee training to en m the permitted effi re of noncompliance No. 2. one-time avoide \$0	\$0 \$0 sure that uent limitation e is captured in d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	noncompliand by more than	ce notifications for 40% is provided the	r any effluent vi within five work Economic Bene	0.00 0.00 0lation ing day: fit Work tering 0.00 0.00	\$0 \$0 and conduct emp which deviates fro s of becoming awa sheet for Violation <b>item (except for</b> \$0 \$0	n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. r one-time avoide \$0 \$0	\$0 \$0 sure that uent limitation e is captured in d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	noncompliand by more than	ce notifications for 40% is provided the	r any effluent vi within five work Economic Bene	0.00 0.00 0lation v ing day: fit Work tering 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a loyee training to en m the permitted effi re of noncompliance No. 2. r one-time avoide \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in <b>d costs)</b> \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	noncompliand by more than	ce notifications for 40% is provided the	r any effluent vi within five work Economic Bene	0.00 0.00 0lation v ing day: fit Work tering 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a loyee training to en m the permitted effi re of noncompliance No. 2. • one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in d costs) \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	noncomplianc by more than ANNU/	e notifications for 40% is provided the ALIZE avoided c	r any effluent vi within five work Economic Bene costs before en	0.00 0.00 0lation v ing day: fit Work tering 0.00 0.00 0.00	\$0 \$0 and conduct emp which deviates fro s of becoming awa sheet for Violatior item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a loyee training to en m the permitted effi re of noncompliance No. 2. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in 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 nspection/Reporting/Sampling Supplies/Equipment	noncompliand by more than	ce notifications for 40% is provided the	r any effluent vi within five work Economic Bene costs before en	0.00 0.00 0lation v fit Work tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$ and conduct emp which deviates fro \$ of becoming awa sheet for Violation <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitatior e is captured in 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 nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	noncomplianc by more than ANNU/ Complete Solution \$51	e notifications for 40% is provided the ALIZE avoided c ALIZE AVOIDE	r any effluent vi within five work Economic Bene costs before er 2005 29-Jun-2020	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 \$ and conduct emp which deviates fro \$ of becoming awa sheet for Violation <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in 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 nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	noncomplianc by more than ANNU/ Complete Solution \$51	e notifications for 40% is provided the ALIZE avoided c ALIZE AVOIDE	r any effluent vi within five work Economic Bene costs before er 2005 29-Jun-2020	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 \$ and conduct emp which deviates fro \$ of becoming awa sheet for Violation <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in 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 nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	noncompliance by more than ANNU/ STANN	e notifications for 40% is provided the ALIZE avoided c 25-Oct-2019 25-Oct-2019 best to submit a no	r any effluent vi within five work Economic Bene costs before er 2005 29-Jun-2020 Concompliance no	0.00 0.00 0lation ing day: fit Work ttering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitatior e is captured in <b>d costs)</b> \$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	noncompliance by more than ANNU/ \$51 Estimated co the monthly m	e notifications for 40% is provided the ALIZE avoided c 25-Oct-2019 25-Oct-2019 bost to submit a no nonitoring periods	r any effluent vi within five work Economic Bene costs before er 29-Jun-2020 concompliance no of February 20	0.00 0.00 cedures olation v ing day; fit Work tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a loyee training to en m the permitted effi re of noncompliance No. 2. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in \$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 Other (as needed)	noncomplianc by more than ANNU/ 51 \$51 Estimated cc the monthly mon	te notifications for 40% is provided the ALIZE avoided c 25-Oct-2019 25-Oct-2019 255 to submit a no nonitoring periods, i	r any effluent vi within five work Economic Bene costs before en 29-Jun-2020 Compliance no of February 20 ncluding the acc	0.00 0.00 cedures olation v ing day; fit Work tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. <b>r one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in \$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 Other (as needed)	noncomplianc by more than ANNU/ 51 \$51 Estimated cc the monthly mon	te notifications for 40% is provided the ALIZE avoided c 25-Oct-2019 25-Oct-2019 255 to submit a no nonitoring periods, i	r any effluent vi within five work Economic Bene costs before en 29-Jun-2020 29-Jun-2020 concompliance no of February 20 ncluding the act uired is the dat	0.00       0.00       cedures       olation v       ing days       fit Work       tering       0.00 <t< td=""><td>\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0</td><td>n/a n/a n/a loyee training to en m the permitted effi re of noncompliance No. 2. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0</td><td>\$0 \$0 sure that uent limitation e is captured in \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0</td></t<>	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a loyee training to en m the permitted effi re of noncompliance No. 2. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in \$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 Other (as needed)	noncomplianc by more than ANNU/ 51 \$51 Estimated cc the monthly mon	te notifications for 40% is provided the ALIZE avoided c 25-Oct-2019 25-Oct-2019 255 to submit a no nonitoring periods, i	r any effluent vi within five work Economic Bene costs before en 29-Jun-2020 29-Jun-2020 concompliance no of February 20 ncluding the act uired is the dat	0.00       0.00       cedures       olation v       ing days       fit Work       tering       0.00 <t< td=""><td>\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0</td><td>n/a n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. <b>r one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0</td><td>\$0 \$0 sure that uent limitation e is captured in \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0</td></t<>	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a loyee training to en m the permitted effi ire of noncompliance No. 2. <b>r one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 sure that uent limitation e is captured in \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	Ed	conomic	Benefit	Wo	rksheet		
Respondent		t					
Case ID No.							
Reg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
Violation No.	-					5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings	\$5,000	11-Feb-2020	27-Mav-2021	1.29	\$22	\$430	\$452
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
<b>Record Keeping System</b>				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$3,000	11-Feb-2020	27-Apr-2021	1.21	\$181	n/a	\$181
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$2,000	11-Feb-2020	27-May-2021	1.29	\$129	n/a	\$129
		larifier; maintain	an even flow ov	ver the		loating scum, floatir e required is the inv npliance.	•
Notes for DELAYED costs	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations	clarifier; maintain and t ildings cost to rep Date required is th her cost to ensur- l at the recomment s in the aeration b	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re	ver the the esti- heavily date ar inute se tion of t	clarifier weirs. Dat imated date of con corroded handrail nd the final date is ettleable solids cor between 10% and on basin meet reco	e required is the inv	vestigation date aeration basin of compliance. eration basin is lved oxygen n concentration
Notes for DELAYED costs	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti- heavily date ar inute se- cion of t -aeratio date ar	clarifier weirs. Dat imated date of con corroded handrail: nd the final date is ettleable solids con between 10% and on basin meet reco nd the final date is	e required is the inv npliance. s and grating at the the estimated date centration in the ae 50%; and the disso ommended minimun	vestigation date aeration basin of compliance. eration basin is lved oxygen n concentration of compliance.
	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti- heavily date ar inute se- cion of t -aeratio date ar	clarifier weirs. Dat imated date of con corroded handrail: nd the final date is ettleable solids con between 10% and on basin meet reco nd the final date is	e required is the inv npliance. s and grating at the the estimated date centration in the ae 50%; and the disso ommended minimun the estimated date	vestigation date aeration basin of compliance. eration basin is lved oxygen n concentration of compliance.
Avoided Costs	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti heavily date an inute se- cion of t -aeratio date an <b>tering</b> 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrail ad the final date is ettleable solids cor between 10% and on basin meet reco nd the final date is <b>item (except for</b> \$0 \$0	e required is the inv npliance. s and grating at the the estimated date contration in the ae 50%; and the disso ommended minimum the estimated date r one-time avoide \$0 \$0	vestigation date aeration basin of compliance. eration basin is lved oxygen n concentration of compliance. d costs) \$0 \$0
<b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti heavily date an inute se- cion of t -aeratio date an <b>tering</b> 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrail ad the final date is ettleable solids corr between 10% and on basin meet recor- nd the final date is <b>item (except for</b> \$0 \$0 \$0	e required is the inv npliance. s and grating at the the estimated date centration in the ac 50%; and the disso pommended minimum the estimated date <b>one-time avoide</b> \$0 \$0 \$0	vestigation date aeration basin of compliance. eration basin is lved oxygen n concentration of compliance. <b>d costs)</b> \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti- heavily date an inute se- cion of to -aeration date an 0.00 0.00 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrails ad the final date is ettleable solids cor between 10% and on basin meet reco nd the final date is <b>item (except for</b> \$0 \$0 \$0 \$0 \$0	e required is the inv npliance. s and grating at the the estimated date centration in the ac 50%; and the disso pomended minimun the estimated date s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	vestigation date aeration basin of compliance. eration basin is lved oxygen n concentration of compliance. \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti heavily date an inute se ion of t -aeratio date an 0.00 0.00 0.00 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrail: ad the final date is bettleable solids con between 10% and on basin meet reco ad the final date is <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	e required is the investigation of the estimated date the estimated date contration in the accontration in the discontration in the discontration in the discontration in the discontration in the estimated date the estimated date the estimated date so the	vestigation date aeration basin of compliance. veration basin is lved oxygen n concentration of compliance. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti heavily date ar inute sector con of the -aeratic date ar 0.00 0.00 0.00 0.00 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrail ad the final date is bettleable solids cor- between 10% and on basin meet reco- nd the final date is <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e required is the investigation of the estimated date the estimated date contration in the are 50%; and the disso one date date date date date date date dat	vestigation date aeration basin of compliance. ration basin is lved oxygen n concentration of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti heavily date an inute se ion of t -aeratio date an 0.00 0.00 0.00 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrail: ad the final date is bettleable solids con between 10% and on basin meet reco ad the final date is <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	e required is the investigation of the estimated date the estimated date contration in the accontration in the discontration in the discontration in the discontration in the discontration in the estimated date the estimated date the estimated date so the	vestigation date aeration basin of compliance. veration basin is lved oxygen n concentration of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti heavily date ar inute sector con of the -aeratic date ar 0.00 0.00 0.00 0.00 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrail ad the final date is bettleable solids cor- between 10% and on basin meet reco- nd the final date is <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e required is the investigation of the estimated date the estimated date contration in the are 50%; and the disso one date date date date date date date dat	vestigation date aeration basin of compliance. ration basin is lved oxygen n concentration of compliance. d costs) \$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)	sludge in the c Estimated Bui and clarifier. I Estimated Ot maintained concentrations of 2.0 mg/L. I	clarifier; maintain and t ildings cost to rep Date required is tl her cost to ensur- l at the recomment s in the aeration the Date required is the	an even flow ov the final date is pair/replace the he investigation e that the 30-m nded concentrat pasin and the re he investigation	ver the the esti heavily date ar inute sector con of the -aeratic date ar 0.00 0.00 0.00 0.00 0.00 0.00	clarifier weirs. Dat imated date of con corroded handrail ad the final date is bettleable solids cor- between 10% and on basin meet reco- nd the final date is <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e required is the investigation of the estimated date the estimated date contration in the are 50%; and the disso one date date date date date date date dat	vestigation date aeration basin of compliance. ration basin is lyed oxygen n concentration of compliance. d costs) 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Date 29-Jun-2020	Docket No.	2020-0890-MWD-E	PCW
	ndent City of Seadrift			Revision 4 (April 2014) evision March 26, 2014
Reg. Ent. Reference				2017
	Media Water Quality			
Ent. Coordi Violation N	nator Alejandro Laje			
	Cite(s) 30 Tex. Admin. Code § 30	5.125(1) and (5) and TPDE	S Permit No. WQ0010822001,	
	(	Operational Requirements N	0. 1	
Violation Desc	ription disposal are properly oper			
			Base Penalty	\$25,000
>> Environmental, I	Property and Human Healt Harm	h Matrix		
	Release Major Moderate	Minor		
OR	Actual Actual Actual Actual Actual		Percent 15.0%	
r'	otential X		Fercent 15.0%	
>>Programmatic Ma		Minan		
Falsifi	ication Major Moderate		Percent 0.0%	
	an health or the environment will or at are protective of human health o			
		Adj	ustment \$21,250	
				\$3,750
			L	43,730
Violation Events				
Num	ber of Violation Events 4	139	Number of violation days	
	dailyweeklymonthlyquarterlyXsemiannualannualsingle event		Violation Base Penalty	\$15,000
Four q	uarterly events are recommended, the investigation date (February			
Good Faith Efforts to	o Comply 0.0%	6	Reduction	\$0
	Before NOE/NO Extraordinary	V NOE/NOV to EDPRP/Settlemer	nt Offer	
	Ordinary			
	N/A X			
	Notes The Respon	ndent does not meet the go this violation.	od faith criteria for	
			Violation Subtotal	\$15,000
Economic Benefit (E	B) for this violation		Statutory Limit Test	
	stimated EB Amount		iolation Final Penalty Total	\$16,500
<b>E</b>		ΨUJ <b>V</b>	ionalion i mai renaity i utal	
			enalty (adjusted for limits)	\$16,500

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Seadrif	t					
Case ID No.		-					
Reg. Ent. Reference No.							
	Water Quality						Years of
Violation No.						<b>Percent Interest</b>	Depreciation
Violation No.	Э						
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	\$1,000	11-Feb-2020	27-Apr-2021	1.21	\$4	\$81	\$85
Buildings	<i><i><i>4</i>1/000</i></i>	11.00 2020		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
Other (as needed) Notes for DELAYED costs	requ	ired is the investig	gation date and	0.00 alarms the fina	\$0 at the 2nd/Bay an al date is the estin	n/a d Grape/Pine lift sta nated date of compli	\$0 tions. Date jance.
Other (as needed) Notes for DELAYED costs Avoided Costs	requ	ired is the investig	gation date and	0.00 alarms the fina	\$0 at the 2nd/Bay an al date is the estin <b>item (except fo</b>	n/a d Grape/Pine lift sta nated date of comple <b>one-time avoide</b>	\$0 tions. Date iance. d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	requ	ired is the investig	gation date and	0.00 alarms the fina tering 0.00	\$0 at the 2nd/Bay an al date is the estin <b>item (except for</b> \$0	n/a d Grape/Pine lift sta nated date of comple r <b>one-time avoide</b> \$0	\$0 tions. Date iance. d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	requ	ired is the investig	gation date and	0.00 alarms the fina tering 0.00 0.00	\$0 at the 2nd/Bay an al date is the estin item (except for \$0 \$0	n/a d Grape/Pine lift sta nated date of comple r <b>one-time avoide</b> \$0 \$0	\$0 tions. Date iance. d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	requ	ired is the investig	gation date and	0.00 alarms the fina tering 0.00 0.00 0.00	\$0 at the 2nd/Bay an al date is the estin item (except for \$0 \$0 \$0	n/a d Grape/Pine lift sta nated date of comple r one-time avoide \$0 \$0 \$0	\$0 tions. Date ance. d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	requ	ired is the investig	gation date and	0.00 alarms the fina tering 0.00 0.00 0.00 0.00	\$0 at the 2nd/Bay an al date is the estin item (except for \$0 \$0 \$0 \$0 \$0	n/a d Grape/Pine lift sta nated date of compli r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0	\$0 tions. Date iance. 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	requ	ired is the investig	gation date and	0.00 the fina the fina 0.00 0.00 0.00 0.00 0.00	\$0 at the 2nd/Bay an al date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d Grape/Pine lift sta nated date of comple r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tions. Date iance. d costs) \$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 ONE-TIME avoided costs	requ	ired is the investig	gation date and	0.00 alarms the fine 0.00 0.00 0.00 0.00 0.00 0.00	\$0 at the 2nd/Bay an al date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d Grape/Pine lift sta nated date of comple r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tions. Date jance. 4 costs) \$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 nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	requ	ired is the investig	gation date and	0.00 the fina the fina 0.00 0.00 0.00 0.00 0.00	\$0 at the 2nd/Bay an al date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d Grape/Pine lift sta nated date of comple r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tions. Date iance. d costs) \$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 ONE-TIME avoided costs	requ	ired is the investig	gation date and	0.00 alarms the fine 0.00 0.00 0.00 0.00 0.00 0.00	\$0 at the 2nd/Bay an al date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d Grape/Pine lift sta nated date of comple r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tions. Date jance. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date Respondent	29-Jun-2020 City of Seadrift		Dock	<b>et No.</b> 2020-0890-MWD-E	Policy	PCW Revision 4 (April 2014)
_	C	Case ID No.	59502					evision March 26, 2014
Reg.	Ent. Ref	erence No. Media	RN101920627 Water Quality					
	Enf. C	Coordinator	- /					
	Viola	ation Number		odo 8 305 12	5(1) and $(5)$ a	and TPDES Permit No. WQ001	0822001	
		Rule Cite(s)	SU TEX. Admin. C		ational Require		.0822001,	
	Violatio	n Description	disposal are prope installed at the stations were Grape/Pine lift st	erly operated Orange/Dalla not secured tations were 8	and maintaine as lift station; by a fence; th 30% covered v	s systems of collection, treatr ed. Specifically, an audio alarr the Harbor/Pine and Harbor/I e wet wells at the Harbor/Ma vith solids; and the Orange/D ured from unauthorized acces	m was not Main lift in and allas and	
						Base	e Penalty	\$25,000
>> Env	vironme	ntal, Propei	ty and Huma	n Health M	latrix			
		Release	Major I	Harm Moderate	Minor			
OR		Actual						
		Potential	X			<b>Percent</b> 15.0%		
>>Pro	gramma	tic Matrix						
		Falsification	Major I	Moderate	Minor	Percent 0.0%		
			II	I				
	Matrix Notes					to pollutants that would exce eceptors as a result of the vio		
						Adjustment	\$21,250	
								\$3,750
	_	-						<i>43,730</i>
Violatio	on Even	ts						
		Number of V	iolation Events	4		16 Number of violation	days	
			daily weekly monthly quarterly semiannual single event	X		Violation Base	e Penalty	\$15,000
		· · · · · · · · · · · · · · · · · · ·		,	,	nt for each lift station, calcula pliance date (February 27, 20		
Good F	aith Eff	orts to Com		25.0%			Reduction	\$3,750
			Extraordinary	re NOE/NOV N	OE/NOV to EDPRI	P/Settlement Offer		
			Ordinary	Х				
			N/A					
			Notes	The Responde	ent achieved co 202	ompliance by February 27, 0.		
						Violation	Subtotal	\$11,250
Econor	nic Bene	efit (EB) for	this violation	1		Statutory Limit	t Test	
		Estimate	ed EB Amount		\$5	Violation Final Pena	alty Total	\$12,750
				This violat	ion Final Ass	essed Penalty (adjusted f	or limits)	\$12,750
						,	7	, ==,: 30

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Seadrif	t					
Case ID No.		•					
leg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of
Violation No.	6						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs					+ 2	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$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
						11/ 4	
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$2,500 Estimated	11-Feb-2020 cost to install an a			\$0 \$5 nge/Dallas lift stati	n/a n/a on; secure the Hart	\$0 \$5 oor/Pine and
	Estimated Harbor/Main	cost to install an a lift stations with fe ne Orange/Dallas	audio alarm at t encing; clean th and Grape/Pine	0.04 he Orar e wet w lift stat	\$5 nge/Dallas lift stati vells at the Harbor cions from unautho	n/a on; secure the Hart /Main and Grape/Pir prized access. Date	\$5 oor/Pine and ne lift stations;
Other (as needed) Notes for DELAYED costs	Estimated Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 he Orar le wet w lift stat	\$5 nge/Dallas lift stati vells at the Harbor tions from unauthor date is the date of	n/a on; secure the Hart /Main and Grape/Pir prized access. Date	\$5 por/Pine and ne lift stations; required is the
Other (as needed)	Estimated Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 he Orar le wet w lift stat	\$5 nge/Dallas lift stati vells at the Harbor tions from unauthor date is the date of <b>item (except fo</b>	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance. r one-time avoide	\$5 por/Pine and ne lift stations; required is the
Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 the Oran le wet w lift stat ne final <b>tering</b>	\$5 nge/Dallas lift stati vells at the Harbor tions from unauthor date is the date of	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance.	\$5 por/Pine and ne lift stations; required is the d costs)
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	Estimated Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 he Orar le wet v lift stat he final <b>tering</b> 0.00	\$5 nge/Dallas lift stati vells at the Harbor tions from unauthor date is the date of item (except for \$0	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance. r one-time avoide \$0	\$5 por/Pine and ne lift stations; required is the d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	Estimated Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 the Orar lift stat te final tering 0.00 0.00	\$5 nge/Dallas lift stati vells at the Harbor tions from unauthor date is the date of item (except for \$0 \$0	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance. r one-time avoide \$0 \$0	\$5 por/Pine and ne lift stations; required is the d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	Estimated Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 he Orar le wet we lift stat tering 0.00 0.00 0.00	\$5 nge/Dallas lift stati yells at the Harbor tions from unauthor date is the date of <b>item (except for</b> \$0 \$0 \$0	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$5 por/Pine and the lift stations; required is the d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 he Orar le wet we lift stat ne final tering 0.00 0.00 0.00 0.00	\$5 nge/Dallas lift stati yells at the Harbor cions from unauthor date is the date of item (except for \$0 \$0 \$0 \$0 \$0	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0	\$5 por/Pine and ne lift stations; required is the 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 Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 he Orar lift stat he final 0.00 0.00 0.00 0.00 0.00	\$5 nge/Dallas lift stati yells at the Harbor tions from unauthor date is the date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$5 por/Pine and ne lift stations; required is the a 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 Harbor/Main and secure th	cost to install an a lift stations with fe ne Orange/Dallas investiga	audio alarm at t encing; clean th and Grape/Pine tion date and th	0.04 he Orar e wet w lift stat e final 0.00 0.00 0.00 0.00 0.00 0.00	\$5 nge/Dallas lift stati yells at the Harbor tions from unauthor date is the date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a on; secure the Hart /Main and Grape/Pin prized access. Date compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$5 por/Pine and ne lift stations; required is the 4 <b>costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Doc	ket No.	2020-0890	-MWD-E		PCW
		lespondent Case ID No.	City of Seadrift							Revision 4 (April 2014) evision March 26, 2014
Reg.		erence No.							PCWR	evision March 20, 2014
			Water Quality							
			Alejandro Laje	1						
	Viola	ation Number Rule Cite(s)	/ 30 Tex Ad	min Code 8 ?	05.125(1) an	d TPDES Pe	ermit No W	0001082	2001	
		Rule Cite(3)	50 TCX. Ad	-	g and Reportir			-	.2001,	
	Violatio	n Description	Failed to have person at plar calibration	nt start-up an records indica		ot less ofte otalizer flov	en than anni w meter was	ually. Spe s not cali	ecifically,	
								Bas	e Penalty	\$25,000
>> En	vironme	ntal, Prope	rty and Hum	an Health	Matrix					
			-	Harm						
OR		<b>Release</b> Actual	Major	Moderate	Minor					
UK		Potential		Х			Percent	5.0%		
			I							
>>Pro	ogramma	<b>tic Matrix</b> Falsification	Major	Madarata	Minor					
		Faisincation	Major	Moderate	MINOI		Percent	0.0%		
	Matrix Notes		th or the enviror t exceed levels t	that are prote		n health or				
						Adi	ustment		\$23,750	
						-				\$1,250
										\$1,250
Violati	ion Even	ts								
		Number of \	/iolation Events	2		370	Number of	violation	days	
							1			
			daily							
			weekly monthly							
			quarterly				Violat	ion Bas	e Penalty	\$2,500
			semiannual							
			annual single event	Х						
		l	single event							
		Two annual	events are recor (February 2, 2						was due	
Good I	Faith Eff	orts to Com	ply	25.0%					Reduction	\$625
			Be	efore NOE/NOV	NOE/NOV to ED	PRP/Settleme	nt Offer			
			Extraordinary							
			Ordinary N/A	Х						
			Notes	The Respor	ndent achieved 2	d compliand 020.	ce on Februa	ary 7,		
			ľ				V	/iolation	Subtotal	\$1,875
Fcono	mic Rene	ofit (FR) for	this violatio	on			Statutor			
20010					10.00	_				
		Estimate	ed EB Amount		\$263		iolation Fi	nal Pen	aity fotal	\$2,125
				This viol	ation Final A	ssessed P	enalty (ad	justed f	or limits)	\$2,125

	E	conomic	Benefit	Wo	rksheet		
Respondent		t					
Case ID No.	59502						
leg. Ent. Reference No.	RN101920627						
Media	Water Quality					Percent Interest	Years of
Violation No.	. /						Depreciation
						5.0	1
	Item Cost	<b>Date Required</b>	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	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs							
Avoided Costs	ANNUA	LIZE avoided c	osts before er		<u> </u>	one-time avoide	
Disposal	; ANNUA	ALIZE avoided c	osts before en	0.00	\$0	\$0	\$0
Disposal Personnel	; ANNUA	ALIZE avoided c	osts before en	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Disposal Personnel nspection/Reporting/Sampling	; ANNU#	ALIZE avoided c	osts before en	0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	; <u>ANNU</u>	ALIZE avoided c	osts before en	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	\$250	ALIZE avoided c	osts before en 7-Feb-2020	0.00 0.00 0.00 0.00 0.00 1.01	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$13	\$0 \$0 \$0 \$0 \$0 \$0 \$250	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$263
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	\$250	2-Feb-2019	7-Feb-2020 alibrate the flov	0.00 0.00 0.00 0.00 0.00 1.01 0.00	\$0 \$0 \$0 \$0 \$0 \$13 \$0 \$0	\$0 \$0 \$0 \$0 \$250 \$0 required is the date	\$0 \$0 \$0 \$0 \$0 \$263 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	\$250	2-Feb-2019	7-Feb-2020 alibrate the flov	0.00 0.00 0.00 0.00 0.00 1.01 0.00	\$0 \$0 \$0 \$0 \$0 \$13 \$0 uring device. Date	\$0 \$0 \$0 \$0 \$250 \$0 required is the date	\$0 \$0 \$0 \$0 \$0 \$263 \$0

		ening Date		<b>Docket No.</b> 2020-0890	D-MWD-E	PCW
		Respondent Case ID No.	City of Seadrift			Revision 4 (April 2014)
Reg.		ference No.			PCW Re	vision March 26, 2014
		Media	Water Quality			
			Alejandro Laje			
	Viola	ation Number Rule Cite(s)	8			
		Rule Cite(3)		30 Tex. Admin. Code § 319.11(c)		
	Violatio	n Description	low-range standards us	ommended sampling and testing metho d for chlorine equipment calibration we ing calibration records for the equipmen chlorine residual analysis.	ere expired and the	
					Base Penalty	\$25,000
>> En	vironme	ntal, Prope	rty and Human Hea	lth Matrix		
			Harm			
OR		Release Actual	Major Modera	e Minor		
ÖK		Potential		X Percent	3.0%	
_			,			
>>Pro	ogramma	<b>tic Matrix</b> Falsification	Major Modera	e Minor		
				Percent	0.0%	
	Matrix Notes		t exceed levels that are p	or could be exposed to insignificant am rotective of human health or environme esult of the violation.		
				Adjustment	\$24,250	
						#7F0
					L	\$750
Violati	ion Even	ts				
		Number of \	/iolation Events 1	7 Number of	f violation days	
			daily			
			weekly monthly			
			quarterly	Viola	tion Base Penalty	\$750
			semiannual		_	
			annual			
			single event X			
			One sin	gle event is recommended.		
Good	Faith Eff	orts to Com	<b>ply</b> 25.0	%	Reduction	\$187
2004			Before NOE/		Reduction	÷-07
			Extraordinary			
			Ordinary X			
			N/A			
			Notes The Res	pondent achieved compliance on Febru 2020.	ary 18,	
					Violation Subtotal	\$563
Econo	mic Bene	efit (EB) for	this violation		Violation Subtotal	\$563
Econo	mic Bene		this violation	Statuto	-	\$563
Econo	mic Bene		ed EB Amount	Statuto	ry Limit Test	

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Seadrif	t					
Case ID No.	59502						
Reg. Ent. Reference No.	RN101920627						
	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	, 	irir		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction		ii		0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$250	11-Feb-2020	18-Feb-2020	0.02	\$0	n/a	\$0
Training/Sampling	<i><i><i><i></i></i></i></i>	11.00 2020	10 . 05 2020	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		•	total chlorine r	esidual.		lorine equipment ca he investigation dat	
Avoided Costs	ANNU/	LIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Avoided Costs Disposal	; ANNU/	LIZE avoided c	osts before en	0.00	\$0	\$0	\$0
		LIZE avoided c	osts before en	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Disposal Personnel	; <u>ANNU/</u>	LIZE avoided c	osts before er	0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Disposal Personnel		LIZE avoided c	osts before er	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling	\$ <u>ANNU</u>	ALIZE avoided c	osts before er	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment	\$ <u>ANNU</u> /	ALIZE avoided c	osts before en	0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	s ANNU/	ALIZE avoided c	osts before er	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	3 ANNU/	ALIZE avoided c	osts before en	0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Doc	ket No.	2020-0890-	MWD-E		PCW
		Respondent Case ID No.	City of Seadrift							Revision 4 (April 2014)
Rea.		ference No.							PCW Re	evision March 26, 2014
- 3			Water Quality							
		Coordinator								
	Viol	ation Number Rule Cite(s)	9							
		Rule Cite(S)		30	Tex. Admin. C	ode § 319.	7(a)			
	Violatio	n Description	Failed to maintain time of analysis for pi	dissolved		and total ch	lorine resid	ual were		
								Base	e Penalty	\$25,000
>> En	vironme	ntal, Prope	rty and Human	Health	Matrix					
		Release		<b>Harm</b> oderate	Minor					
OR		Actual		oderate	MINOR					
		Potential			X		Percent	3.0%		
>>Pro	ogramma	<b>tic Matrix</b> Falsification	Major M	oderate	Minor					
							Percent	0.0%		
	Matrix		h or the environmer t exceed levels that							
	Notes			result	of the violatio	on.				
						Adj	ustment		\$24,250	
										\$750
										φ <b>γ</b> 50
Violati	ion Even	ts								
		Number of \	/iolation Events	1		16	Number of	violation	days	
			daily weekly							
			monthly							
			quarterly				Violati	ion Base	e Penalty	\$750
			semiannual							
			annual single event	x						
				~						
			0	no cinalo a	event is recom	mondod				
				ne single e	event is recom	intended.				
Good	Caith Eff	orts to Com	nlv	25.0%					Reduction	\$187
Good					NOE/NOV to EDF	PRP/Settleme	nt Offer		Reduction	<i>\</i>
			Extraordinary							
			Ordinary	Х						
			N/A							
			Notes Th	ne Respond	dent achieved 20	compliance 020.	e on Februa	ry 27,		
			<u> </u>				v	iolation	Subtotal	\$563
Econo	mic Ben	efit (EB) for	this violation				Statutor	v Limit	Test	
			ed EB Amount		#1			-	_	
		Estimate			\$1		iolation Fi		-	\$638
1				This viola	ation Final A	ssessed P	enalty (adj	usted fo	or limits)	\$638

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	59502	t					
	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							
Delayed Costs	1	12				<b>1</b>	
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	\$250	11-Feb-2020	27-Feb-2020	0.04	\$1	n/a	\$1
Remediation/Disposal				0.00	\$0	n/a	\$0
· ·							
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00 onal gui	\$0 dance and conduct	n/a t employee training	\$0 to ensure that
Other (as needed) Notes for DELAYED costs	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 onal gui I, and t being u en. Dat date of	\$0 dance and conductor otal chlorine residu sed to provide the e required is the ir compliance.	n/a t employee training ual is properly recor e minimum quality a nvestigation date ar	\$0 to ensure that ded for each issurance id the final date
Other (as needed) Notes for DELAYED costs Avoided Costs	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 onal gui H, and t being u en. Dat date of	\$0 dance and conduc otal chlorine residu sed to provide the e required is the ir compliance. item (except for	n/a t employee training ual is properly recor e minimum quality a nvestigation date ar rone-time avoide	\$0 to ensure that ded for each issurance id the final date d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 onal gui 1, and t being u en. Dat date of tering 0.00	\$0 dance and conduc otal chlorine residu sed to provide the e required is the ir compliance. item (except for \$0	n/a t employee training ual is properly recor e minimum quality a nvestigation date ar r one-time avoide \$0	\$0 to ensure that ded for each ssurance ind the final date <b>d costs)</b> \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 onal gui 1, and t being t en. Dat date of tering 0.00 0.00	\$0 dance and conduc btal chlorine residu sed to provide the e required is the ir compliance. item (except for \$0 \$0	n/a t employee training ual is properly recor e minimum quality a nyestigation date ar vestigation date ar nyestigation date ar nyestigation date ar nyestig	\$0 to ensure that ded for each ssurance d the final date <b>d costs)</b> \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 onal gui 1, and t being u en. Dat date of tering 0.00 0.00	\$0 dance and conduc otal chlorine residu sed to provide the e required is the ir compliance. item (except for \$0 \$0 \$0	n/a t employee training ual is properly recor e minimum quality a nyestigation date ar r one-time avoide \$0 \$0	\$0 to ensure that ded for each ssurance d the final date <b>d costs)</b> \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 0.01 gui 1, and t being t en. Dat date of 0.00 0.00 0.00 0.00	\$0 dance and conduc otal chlorine residu sed to provide the e required is the ir compliance. item (except for \$0 \$0 \$0 \$0	n/a t employee training ual is properly recor e minimum quality a nyestigation date ar r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 to ensure that ded for each issurance id the final date <b>d costs)</b> \$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	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 0.00 1, and t being t en. Dat date of 0.00 0.00 0.00 0.00 0.00	\$0 dance and conduc otal chlorine residu sed to provide the e required is the ir compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a t employee training ual is properly recor e minimum quality a nyestigation date ar r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 to ensure that ded for each issurance id the final date d costs) \$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	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 0.00 1, and t being t en. Dat date of 0.00 0.00 0.00 0.00 0.00 0.00	\$0 dance and conduction otal chlorine residu sed to provide the e required is the in compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a t employee training ual is properly recor e minimum quality a nyestigation date ar vestigation date ar one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 to ensure that ded for each ssurance d the final date <b>d costs)</b> \$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	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 0.00 1, and t being t en. Dat date of 0.00 0.00 0.00 0.00 0.00	\$0 dance and conduc otal chlorine residu sed to provide the e required is the ir compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a t employee training ual is properly recor e minimum quality a nyestigation date ar r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 to ensure that ded for each issurance id the final date <b>d costs)</b> \$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	the time of individua requirements f	analysis for disso al parameter; and for the analysis o	lved oxygen, pH d duplicates are f dissolved oxyg is the	0.00 0.00 1, and t being t en. Dat date of 0.00 0.00 0.00 0.00 0.00 0.00	\$0 dance and conduction otal chlorine residu sed to provide the e required is the in compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a t employee training ual is properly recor e minimum quality a nyestigation date ar vestigation date ar one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 to ensure that ded for each ssurance d the final date <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	ening Date	29-Jun-2020 City of Seadrift	Docket N	<b>10.</b> 2020-0890-MWD-E	Delier	PCW
C	case ID No.	59502				Revision 4 (April 2014) evision March 26, 2014
Reg. Ent. Ref		RN101920627 Water Quality				
	Coordinator	Alejandro Laje				
Viola	ation Number Rule Cite(s)	10 30 Tex. Admin. Code § 305	125(1) and (5) and T	PDES Parmit No. WO0010	822001	
		0 1ex. Admin. Code 9 505	perational Requirement	nts No. 1	022001,	
Violatio	n Description	disposal are properly opera	ated and maintained.	ms of collection, treatmen Specifically, the ventilation ns were not operational.		
				Base	Penalty	\$25,000
>> Environme	ntal, Prope	rty and Human Healtl	n Matrix			
	Release	Harm Major Moderate	Minor			
OR	Actual Potential			Percent 15.0%		
			]]	10.0 %		
>>Programma	Falsification	Major Moderate	Minor			
				Percent 0.0%		
					ما امت ما م	
Matrix Notes		n or the environment will or rotective of human health or				
				Adjustment	\$21,250	
					[	\$3,750
Violation Even	ts					
	Number of \	/iolation Events 1	8	Number of violation d	ays	
		daily	 ]			
		weekly				
		monthly X quarterly	-	Violation Base	Penalty	\$3,750
		semiannual			• [	
		annual single event				
	One monthly	event is recommended, calc to the complian	ulated from the invest ce date (February 19,		, 2020)	
Good Faith Effe	orts to Com	ply 25.0% Before NOE/NOV			eduction	\$937
		Extraordinary				
		Ordinary X				
		N/A	ndent achieved compl	iance on February 19,		
		Notes	2020.	lance on rebruary 19,		
		<u>r</u>		Violation S	Subtotal	\$2,813
Economic Bene	efit (EB) for	this violation		Statutory Limit	Test	
		ed EB Amount	\$0	Violation Final Penal	_	\$3,188
	Estimation				-	\$3,188
			nation Final Assesse	ed Penalty (adjusted for	innits)	\$3,188

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Seadrif	t					
Case ID No.	59502						
Reg. Ent. Reference No.	RN101920627						
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
	10					5.0	1!
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Thom Decemention		Date Required	That Date	113	Interest Saveu	COSIS Saveu	LD Amount
Item Description							
Delayed Costs							
Equipment	\$200	11-Feb-2020	19-Feb-2020	0.02	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Land				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Record Keeping System Training/Sampling				0.00	\$0	n/a	<u>\$0</u> \$0
Remediation/Disposal				0.00	\$0	n/a	<u>\$0</u> \$0
		ļ					
				0 00	¢0	n/a	¢0
Permit Costs Other (as needed)	Estimated c	ost to repair/repla	ce the ventilati	0.00 0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed) Notes for DELAYED costs		required is the in	vestigation dat	0.00 on fans e and th	\$0 in the chlorinatior ne final date is the	n/a and dechlorination date of compliance	\$0 rooms. Date
Other (as needed) Notes for DELAYED costs Avoided Costs		required is the in	vestigation dat	0.00 on fans e and th	\$0 in the chlorinatior ne final date is the item (except for	n/a and dechlorination date of compliance one-time avoide	\$0 rooms. Date d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal		required is the in	vestigation dat	0.00 on fans e and th tering 0.00	\$0 in the chlorinatior ne final date is the item (except for \$0	n/a n and dechlorination date of compliance r <b>one-time avoide</b> \$0	\$0 rooms. Date d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel		required is the in	vestigation dat	0.00 on fans e and th tering 0.00 0.00	\$0 in the chlorination he final date is the item (except for \$0 \$0	n/a and dechlorination date of compliance r one-time avoide \$0 \$0	\$0 rooms. Date d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling		required is the in	vestigation dat	0.00 on fans e and th tering 0.00 0.00 0.00	\$0 in the chlorination re final date is the <b>item (except fo</b> ) \$0 \$0 \$0	n/a and dechlorination date of compliance r one-time avoide \$0 \$0 \$0	\$0 rooms. Date d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment		required is the in	vestigation dat	0.00 on fans e and th tering 0.00 0.00 0.00 0.00	\$0 in the chlorination in the chlorination final date is the item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a and dechlorination date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 rooms. Date d costs) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		required is the in	vestigation dat	0.00 on fans e and th tering 0.00 0.00 0.00 0.00 0.00	\$0 in the chlorination final date is the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and dechlorination date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 rooms. Date d costs) \$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		required is the in	vestigation dat	0.00 on fans e and th 0.00 0.00 0.00 0.00 0.00 0.00	\$0 in the chlorination be final date is the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and dechlorination date of compliance r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 rooms. Date d costs) \$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		required is the in	vestigation dat	0.00 on fans e and th tering 0.00 0.00 0.00 0.00 0.00	\$0 in the chlorination final date is the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and dechlorination date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 rooms. Date d costs) \$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		required is the in	vestigation dat	0.00 on fans e and th 0.00 0.00 0.00 0.00 0.00 0.00	\$0 in the chlorination be final date is the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and dechlorination date of compliance r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 rooms. Date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Scre	ening Date	29-Jun-2020	Doc	ket No. 2020-0890-MWD-E	PCW
		•	City of Seadrift			Policy Revision 4 (April 2014)
Peg		Case ID No. ference No.				PCW Revision March 26, 2014
Reg.	EIII. KEI		Water Quality			
	Enf. C	Coordinator	• /			
	Viola	ation Number				
		Rule Cite(s)			), Tex. Water Code § 26.121(a)(1), )1, Permit Conditions No. 2(g)	and
	Violatio	n Description	water in the Stat	te. Specifically, on Octob	rge of sewage into or adjacent to an er 1, 2018 and October 16, 2018, to gallons of sewage occurred from the ft station.	wo
					Base Per	alty \$25,000
>> En	vironme	ntal, Propei	rty and Human			
		Release		Harm oderate Minor		
OR		Actual		X		
		Potential			Percent 5.0%	
>>Pro	gramma	tic Matrix				
		Falsification	Major M	oderate Minor	-	
					Percent 0.0%	
	Matrix Notes	Human healt	th or the environme	nt has been exposed to i result of the violatio	insignificant amounts of pollutants a n.	sa
	Hotes					
					Adjustment \$23	,750
						\$1,250
Violati	ion Even	ts				
		Number of V	/iolation Events	1	15 Number of violation days	
			daily			
			weekly monthly			
			quarterly	X	Violation Base Per	nalty \$1,250
			semiannual			
			annual single event			
					the date of the initial unauthorized	
		dis	scharge (October 1,	2018) to the date of con	npliance (October 16, 2018).	
0				<b>2- 02</b> /		
Good I	Faith Eff	orts to Com		25.0% NOE/NOV NOE/NOV to EDP	RP/Settlement Offer	ction \$312
			Extraordinary			
			Ordinary	Х		
			N/A	<u> </u>		
			Notes T	-	compliance on October 16, 018.	
					Violation Sub	total \$938
Econor	mic Bene	efit (EB) for	this violation		Statutory Limit Tes	st
		Estimate	ed EB Amount	\$19	Violation Final Penalty 1	<b>otal</b> \$1,063
1						
				This violation Final 4	sessed Penalty (adjusted for lin	nits) \$1,063

	E	conomic	Benefit	Wo	rksheet		
Respondent		ť					
Case ID No.							
Reg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of
Violation No.	11						Depreciation
		Data Daminut	Elizad Data	Maria		5.0	15
		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	\$5,000	1-Oct-2018	16-Oct-2018	0.04	\$1	\$14	\$15
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$2,000	1-Oct-2018	16-Oct-2018	0.00	\$0 \$4	n/a	\$0
Remediation/Disposal Permit Costs	\$2,000	1-0ct-2018	16-0ct-2018	0.04	\$4	n/a n/a	<u>\$4</u> \$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	Estimated	cost to remove a	is the nd properly disp	date of	compliance. the sewage, and d	orized discharge and isinfect the affected date is the date of	l area. Date
Avoided Costs		ALIZE avoided o	osts before en	terina	item (excent 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		\$7,000			TOTAL		\$19

Decreadent	29-Jun-2020	Docket No.	2020-0890-MWD-E	PCW
Case ID No.	City of Seadrift			Policy Revision 4 (April 2014)
Reg. Ent. Reference No.				PCW Revision March 26, 2014
-	Water Quality			
Enf. Coordinator				
Violation Number		SS 205 125(1) and 210	6 and TDDEC Dormit No.	
Rule Cite(s)		§§ 305.125(1) and 319. Monitoring and Reporting		
Violation Description	Failed to assure the qua	lity of all measurements d spikes. Specifically, dup	through the use of blank blicate analysis was not be	eing
			Base Pe	enalty \$25,000
>> Environmental, Proper	rty and Human Health <sub>Harm</sub>	Matrix		
Release	Major Moderate	Minor		
OR Actual				
Potential		X	Percent 3.0%	
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		
			Percent 0.0%	
Human healt	h or the environment will or o	could be exposed to insid	inificant amounts of pollu	tants
Matrix	t exceed levels that are prote	ective of human health o		
	resu	It of the violation.		
		Ad	justment \$2	4,250
				\$750
Violation Events				
Number of V	/iolation Events 1	16	Number of violation day	S
	daily weekly monthly quarterly semiannual annual single event X		Violation Base Pe	enalty \$750
	One single	event is recommended.		
Good Faith Efforts to Com			Red	uction \$187
	Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlem	ent Offer	
	Ordinary X			
	N/A		<b>–</b>	
		ndent achieved complian 2020.	ce on February 27,	
	The Respon		ce on February 27, Violation Sul	ototal \$563
Economic Benefit (EB) for	Notes The Respon		Violation Sul	
Economic Benefit (EB) for	Notes The Response	2020.	Violation Sul Statutory Limit Te	est
	Notes The Respon	2020.	Violation Sul	est
	Notes The Respondent The Respondence Th	2020. \$0	Violation Sul Statutory Limit Te	est Total \$638

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Seadrif	t					
Case ID No.	59502						
Reg. Ent. Reference No.	RN101920627						
	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				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$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)				0.00	\$0	n/a	\$0
	Estimated cost	t to undate operat		and cor	nduct employee tr	aining to ensure that	t duplicates are
Notes for DELAYED costs	being used to	provide the minir captured i	num quality as in the Economic	surance Benefit	requirements for t Worksheet for Vi		lved oxygen is
Notes for DELAYED costs Avoided Costs	being used to	provide the minir captured i	num quality as in the Economic	Benefit Benefit	requirements for t Worksheet for Vi	the analysis of disso plation No. 9.	lved oxygen is
	being used to	provide the minir captured i	num quality as in the Economic	Benefit Benefit Dering 0.00	requirements for t Worksheet for Vir item (except for \$0	the analysis of disso plation No. 9. • one-time avoided \$0	lved oxygen is d costs) \$0
Avoided Costs Disposal Personnel	being used to	provide the minir captured i	num quality as in the Economic	Benefit Benefit Description De	requirements for t Worksheet for Vir item (except for \$0 \$0	the analysis of disso plation No. 9. <b>r one-time avoide</b> \$0 \$0	lved oxygen is d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	being used to	provide the minir captured i	num quality as in the Economic	tering 0.00 0.00 0.00	requirements for t Worksheet for Vir item (except for \$0 \$0 \$0	the analysis of disso plation No. 9. one-time avoided \$0 \$0 \$0	lved oxygen is d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	being used to	provide the minir captured i	num quality as in the Economic	tering 0.00 0.00 0.00 0.00 0.00	requirements for t Worksheet for Vir item (except for \$0 \$0 \$0 \$0 \$0	the analysis of disso plation No. 9. • one-time avoide \$0 \$0 \$0 \$0	lved oxygen is 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	being used to	provide the minir captured i	num quality as in the Economic	tering 0.00 0.00 0.00 0.00 0.00 0.00	requirements for t Worksheet for Vi- item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the analysis of disso plation No. 9. • one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	lved oxygen is 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	being used to	provide the minir captured i	num quality as in the Economic	E Benefit D.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	requirements for t Worksheet for Vi- item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the analysis of disso plation No. 9. • <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	lved oxygen is (1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	being used to	provide the minir captured i	num quality as in the Economic	tering 0.00 0.00 0.00 0.00 0.00 0.00	requirements for t Worksheet for Vi- item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the analysis of disso plation No. 9. • one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	lved oxygen is 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	being used to	provide the minir captured i	num quality as in the Economic	E Benefit D.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	requirements for t Worksheet for Vi- item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the analysis of disso plation No. 9. • <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	lved oxygen is (1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



# Compliance History Report

Compliance History Report for CN600342810, RN101920627, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator:	CN600342810, City of Seadrift	Classification: SATISFACTO	DRY Rating: 3.16
Regulated Entity:	RN101920627, CITY OF SEADRIFT	Classification: SATISFACT	ORY Rating: 0.62
<b>Complexity Points:</b>	7	Repeat Violator: NO	
CH Group:	08 - Sewage Treatment Facilities		
Location:	101 South Orange Street, in the City of S	Seadrift, Calhoun County, Texas 77	7983
TCEQ Region:	REGION 14 - CORPUS CHRISTI		
ID Number(s): WASTEWATER PERMIT WQ0010822001 WASTEWATER EPA ID TX0026671 WASTEWATER LICENSING LICENSE WQ0010822001			
Compliance History Peri	iod: September 01, 2015 to August 31, 2	2020 Rating Year: 2020	Rating Date: 09/01/2020
Date Compliance Histor	y Report Prepared: December 29, 2	020	
Agency Decision Requir	ing Compliance History: Enforcem	ent	
Component Period Selected: December 29, 2015 to December 29, 2020			
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.			
Name: Alejandro LajePhone: (512) 239-2547			
Site and Owner/Operator History:			
1) Has the site been in existence and/or operation for the full five-year compliance period?YES2) Has there been a (known) change in ownership/operator of the site during the compliance period?NO			YES NO
<u>Components (Multimedia) for the Site Are Listed in Sections A - J</u>			
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 04, 2016	(1316001)
Item 2	March 04, 2016	(1325383)
Item 3	March 23, 2016	(1332122)
Item 4	May 25, 2016	(1346083)
Item 5	June 28, 2016	(1352515)
Item 6	July 27, 2016	(1359486)
Item 7	August 25, 2016	(1365926)
Item 8	September 28, 2016	(1372617)
Item 9	November 01, 2016	(1378791)
Item 10	December 01, 2016	(1384756)
Item 11	January 04, 2017	(1390887)
Item 12	March 23, 2017	(1404397)
Item 13	April 04, 2017	(1411490)

Item 14	April 19, 2017	(1417987)
Item 15	May 11, 2017	(1425578)
Item 16	June 16, 2017	(1431610)
Item 17	July 18, 2017	(1440200)
Item 18	August 14, 2017	(1443883)
Item 19	September 28, 2017	(1450489)
Item 20	October 20, 2017	(1456338)
Item 21	November 17, 2017	(1461806)
Item 22	November 22, 2017	(1520449)
Item 23	December 18, 2017	(1468191)
Item 24	January 22, 2018	(1474891)
Item 25	March 16, 2018	(1490781)
Item 26	May 01, 2018	(1494032)
Item 27	May 17, 2018	(1500973)
Item 28	June 14, 2018	(1508065)
Item 29	July 16, 2018	(1514398)
Item 30	August 20, 2018	(1527620)
Item 31	October 09, 2018	(1533980)
Item 32	October 15, 2018	(1599851)
Item 33	November 25, 2018	(1541812)
Item 34	December 18, 2018	(1545584)
Item 35	January 15, 2019	(1560751)
Item 36	February 11, 2019	(1560749)
Item 37	April 17, 2019	(1572183)
Item 38	May 21, 2019	(1583972)
Item 39	June 17, 2019	(1583973)
Item 40	July 29, 2019	(1593520)
Item 41	September 11, 2019	(1606752)
Item 42	November 20, 2019	(1619409)
Item 43	December 17, 2019	(1626762)
Item 44	January 10, 2020	(1634403)
Item 45	February 12, 2020	(1641019)
Item 46	March 08, 2020	(1647537)
Item 47	April 16, 2020	(1653879)
Item 48	June 15, 2020	(1666973)
Item 49	July 20, 2020	(1673922)
Item 50	September 29, 2020	(1687271)
Item 51	October 08, 2020	(1687270)
Item 52	October 11, 2020	(1693611)

#### 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.

	5	5	
1		Date: 04/30/2020 (1660460)	
		Self Report? YES Classification:	Moderate
		Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)	
		30 TAC Chapter 305, SubChapter F 305.125(1)	
		Description: Failure to meet the limit for one or more permit parameter	
2		Date: 07/31/2020 (1680702)	
		Self Report? YES Classification:	Moderate
		Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)	
		30 TAC Chapter 305, SubChapter F 305.125(1)	
		Description: Failure to meet the limit for one or more permit parameter	

#### F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs): N/A

- H. Voluntary on-site compliance assessment dates:  $$\rm N/A$$
- I. Participation in a voluntary pollution reduction program:  $$\rm N/A$$
- J. Early compliance: N/A
- Sites Outside of Texas:

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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#### IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING CITY OF SEADRIFT RN101920627

BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

#### AGREED ORDER DOCKET NO. 2020-0890-MWD-E

#### I. JURISDICTION AND STIPULATIONS

On \_\_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Seadrift (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

- 1. The Respondent owns and operates a wastewater treatment facility located at 101 South Orange Street in the City of Seadrift, Calhoun County, Texas (the "Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
- 2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. WATER CODE ch. 26 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$54,865 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The amount of \$10,973 is deferred contingent upon the 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 of this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms and conditions contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

Pursuant to TEX. WATER CODE § 7.067, \$43,892 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with

all the terms and conditions of this Order, which includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
- 7. 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.
- 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Facility:
  - a. On October 16, 2018, located and sealed infiltration to the collection system, replaced the manhole cover near the 3<sup>rd</sup>/Dallas lift station, removed and properly disposed of the sewage, and disinfected the affected area;
  - b. On February 7, 2020, calibrated the totalizer flow meter;
  - c. On February 18, 2020, purchased and utilized new low-range standards for chlorine equipment calibration and maintained calibration records for total chlorine residual;
  - d. On February 19, 2020, repaired/replaced the ventilation fans in the chlorination and dechlorination rooms;
  - e. On February 27, 2020, installed an audio alarm at the Orange/Dallas lift station, secured the Harbor/Pine and Harbor/Main lift stations with fencing, cleaned the wet wells at the Harbor/Main and Grape/Pine lift stations, and secured the Orange/Dallas and Grape/Pine lift stations from unauthorized access; and
  - f. On February 27, 2020, updated the Facility's operational guidance and conducted employee training to ensure that the time of analysis for dissolved oxygen, pH, and total chlorine residual is properly recorded for each individual parameter; and duplicates are being used to provide the minimum quality assurance requirements for the analysis of dissolved oxygen.

City of Seadrift DOCKET NO. 2020-0890-MWD-E Page 3

#### **II. ALLEGATIONS**

During an investigation conducted on February 11, 2020, an investigator documented that the Respondent:

- 1. Failed to take all reasonable steps to minimize or prevent any discharge or sludge use or disposal or other permit violation that has a reasonable likelihood of adversely affecting human health or the environment, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (4), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010822001, Permit Conditions No. 2.d. Specifically, an accumulation of sludge was observed in the receiving ditch and around the outfall discharge pipe.
- 2. Failed to conduct sample collection according to the recommended sampling and testing methods, in violation of 30 TEX. ADMIN. CODE § 319.11(a) and (b). Specifically, the Facility was not collecting bacteria samples directly into the appropriate sample container.
- 3. Failed to report to the TCEQ in writing, any effluent violation which deviates from the permitted effluent limitation by more than 40% within five working days of becoming aware of noncompliance, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010822001, Monitoring and Reporting Requirements No. 7.c. Specifically, the Respondent did not provide noncompliance notifications for the exceedances during the monthly monitoring periods of February 2019 and September 2019.
- 4. 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. WQ0010822001, Operational Requirements No. 1. Specifically, the clarifier center ring contained an accumulation of floating scum; floating solids and sludge were observed at the clarifier weirs; an uneven flow was observed over the clarifier weirs; and the handrails and grating at the aeration basin and clarifier were heavily corroded. Additionally, dissolved oxygen concentrations of 0.70 milligrams per liter ("mg/L") in the aeration basin and 0.25 mg/L in the re-aeration basin did not meet the recommended minimum concentration of 2.0 mg/L; and the 30 minute settleable solids concentration of 98% in the aeration basin did not meet the recommended concentration of between 10% and 50%.
- 5. 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. WQ0010822001, Operational Requirements No. 1. Specifically, audio alarms were not installed at the 2nd/Bay, Grape/Pine and Orange/Dallas lift stations; the Harbor/Pine and Harbor/Main lift stations were not secured by a fence; the wet wells at the Harbor/Main and Grape/Pine lift stations were not secured from unauthorized access.
- 6. Failed to have automatic flow measuring devices accurately calibrated by a trained person at plant start-up and thereafter not less often than annually, in violation of 30

TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0010822001, Monitoring and Reporting Requirements No. 5. Specifically, calibration records indicated that the totalizer flow meter was not calibrated between February 2, 2018 and February 7, 2020.

- 7. Failed to comply with recommended sampling and testing methods, in violation of 30 TEX. ADMIN. CODE § 319.11(c). Specifically, the low-range standards used for chlorine equipment calibration were expired and the Facility was not keeping calibration records for the equipment used for total chlorine residual analysis.
- 8. Failed to maintain records for each measurement or sample taken, in violation of 30 TEX. ADMIN. CODE § 319.7(a). Specifically, the time of analysis for dissolved oxygen, pH, and total chlorine residual were not being properly recorded for each individual parameter.
- 9. Failed to ensure the Facility and all of it's 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. WQ0010822001, Operational Requirements No. 1. Specifically, the ventilation fans in the chlorination and dechlorination rooms were not operational.
- 10. Failed to prevent an unauthorized discharge of sewage into or adjacent to any water in the State, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0010822001, Permit Conditions No. 2(g). Specifically, on October 1, 2018 and October 16, 2018, two unauthorized discharges totaling 150 gallons of sewage occurred from the 3rd/Dallas lift station.
- 11. Failed to assure the quality of all measurements through the use of blanks, standards, duplicates, and spikes, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and 319.6 and TPDES Permit No. WQ0010822001, Monitoring and Reporting Requirements No. 1. Specifically, duplicate analysis was not being performed on a 10% basis each day that dissolved oxygen samples are analyzed.

#### **III. DENIALS**

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

#### **IV. ORDERING PROVISIONS**

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Seadrift, Docket No. 2020-0890-MWD-E" to:

City of Seadrift DOCKET NO. 2020-0890-MWD-E Page 5

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

- 2. The Respondent shall implement and complete an SEP as set forth in Section I, Paragraph No. 4 . The amount of \$43,892 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
- 3. The Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Order:
    - i. Determine the cause of the discharges of sludge and make necessary repairs/adjustments to the Facility to minimize or prevent any discharge of sludge into the receiving stream;
    - ii. Remove and properly dispose of the sludge from the receiving stream;
    - Update operational procedures and conduct employee training to ensure that bacteria samples are collected directly into the appropriate sample container, and noncompliance notifications for any effluent violation which deviates from the permitted effluent limitation by more than 40% is provided within five working days of becoming aware of noncompliance;
    - iv. Remove the accumulation of floating scum, floating solids and sludge in the clarifier and maintain an even flow over the clarifier weirs; and
    - v. Install operational audio alarms at the 2nd/Bay and Grape/Pine lift stations;
  - b. Within 45 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 3.d below, to demonstrate compliance with Ordering Provision Nos. 3.a.i through 3.a.v.
  - c. Within 60 days after the effective date of this Order:
    - i. Repair/replace the heavily corroded handrails and grating at the aeration basin and clarifier; and
    - ii. Ensure that the 30-minute settleable solids concentration in the aeration basin is maintained at the recommended concentration of between 10% and 50%; and the dissolved oxygen concentrations in the aeration basin and the re-aeration basin meet recommended minimum concentration of 2.0 mg/L

City of Seadrift DOCKET NO. 2020-0890-MWD-E Page 6

d. Within 75 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.c.i and 3.c.ii. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

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

with a copy to:

Water Section Manager Corpus Christi Regional Office Texas Commission on Environmental Quality 6300 Ocean Drive, Suite 1200 Corpus Christi, Texas 78412-5839

- 4. All relief not expressly granted in this Order is denied.
- 5. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 6. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 7. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of

what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.

- 8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- This Order may be executed in separate and multiple counterparts, which together shall 9. 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.
- 10. 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 Seadrift DOCKET NO. 2020-0890-MWD-E Page 8

#### SIGNATURE PAGE

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

ive Director For the Execu

12/30/2021 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 TCEO, in accepting payment for the penalty amount, is materially relying on such representation.

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

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

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

Signature

November 3, 2021 Date Mayor

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

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

# Attachment A

# Docket Number: 2020-0890-MWD-E

# SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	City of Seadrift
Penalty Amount:	Forty-Three Thousand Eight Hundred Ninety-Two Dollars (\$43,892)
SEP Offset Amount:	Forty-Three Thousand Eight Hundred Ninety-Two Dollars (\$43,892)
Type of SEP:	Compliance
Project Name:	WWTP Outfall Improvements
Location of SEP:	Calhoun County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset the administrative Penalty Amount assessed in this Agreed Order for Respondent to perform a Supplemental Environmental Project ("SEP"). The SEP Offset Amount is set forth above and such offset is conditioned upon completion of the project in accordance with the terms of this Attachment A.

Respondent is a Local Government that qualifies under Texas Water Code § 7.067 to apply the SEP Offset Amount set forth above to correct violations at its wastewater treatment facility (the "Facility") which are described in this Agreed Order. This Agreed Order cites violations at Respondent's Facility.

#### 1. Project Description

A. Project

Respondent shall hire a contractor to replace an existing outdated outfall at the Facility. The existing outfall is a dug ditch and is subject to erosion and unwanted vegetation growth which makes it hard to maintain and clean properly. The new outfall will be in the same outfall ditch currently used but will be bulkheaded on the sides with vinyl sheet bulkheading and cement in the bottom for about 60 to 100 feet. Specifically, the SEP Offset Amount shall be used for materials, supplies, and equipment for outfall replacement (the "Project"). Respondent shall solicit bids from qualified contractors to perform the Project. Any advertisement, including publication, related to the SEP must include the enforcement statement as stated in Section 6, Publicity. The SEP will be performed in accordance with all federal, state, and local environmental laws and regulations, including permits that may be required prior to commencement of the SEP.

Respondent shall use the SEP Offset Amount only for the direct cost of implementing the Project, including supplies, materials, and equipment rentals, as listed in Subsection C. Minimum Expenditure, Estimated Cost Schedule, below. No portion of the SEP Offset Amount shall be spent on administrative costs, including but not City of Seadrift Docket No. 2020-0890-MWD-E Attachment A

limited to operating costs, reporting expenses, handling of expenses, project coordination, liability, or equipment breakdowns.

Respondent's signature affixed to the attached Agreed Order certifies that Respondent has no prior commitment to perform this Project and that the SEP is being performed solely as part of the terms of settlement in this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by allowing easy access to monitor the receiving stream and reducing erosion at the outfall.

C. Minimum Expenditure

Respondent shall spend at least the SEP Offset Amount to complete the project described in Section 1, above, and comply with all other provisions of this SEP. Respondent understands that it may cost more than the SEP Offset Amount to complete the Project.

# Estimated Cost Schedule

Item	Quantity	Cost	Total
Outfall Replacement	1	\$50,000	\$50,000
Total			\$50,000

# 2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, Respondent shall begin implementation of the SEP. Respondent shall have completed the SEP in its entirety within 75 days after the effective date of this Agreed Order.

# 3. Records and Reporting

A. Progress Report

Within 30 days after the effective date of this Agreed Order, Respondent shall submit a Notice of Commencement to the TCEQ describing actions performed to date to implement the Project. Within 75 days Respondent shall submit a Final Report to the TCEQ containing detailed information on all actions completed on the Project.

Days from Effective Order Date	Information Required
30	Notice of Commencement describing actions taken to begin project
75	Notice of SEP completion

# **Reporting Schedule**

City of Seadrift Docket No. 2020-0890-MWD-E Attachment A

# B. Final Report

Within 75 days after the effective date of the Agreed Order, or within 30 days after completion of the SEP, whichever is earlier, Respondent shall submit a Final Report to the TCEQ, which shall include the following:

- 1. Itemized list of expenditures and total cost of the Project;
- 2. Copies of invoices or receipts corresponding to the itemized list in paragraph 3.B.1., above;
- 3. Copies of cleared checks or payment records corresponding to the itemized list in paragraph 3.B.1., above;
- 4. Copies of proof of advertisement of invitation for bids, if applicable;
- 5. A certified statement of SEP completion and document authentication;
- 6. Detailed map showing specific location of the project site(s);
- 7. Equipment logs showing the hours the equipment was utilized on the project;
- 8. Dated photographs of the purchased materials and supplies; before and after work being performed during the Project; and of the completed Project; and
- 9. Any additional information Respondent believes will, or that is requested by TCEQ to demonstrate compliance with this Attachment A.
- C. Address

Respondent shall submit all SEP reports and any additional information as requested to the following address:

Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 P.O. Box 13087 Austin, Texas 78711-3087

# 4. Additional Information and Access

Respondent shall provide additional information as requested by TCEQ staff and shall allow access to all records related to the SEP Offset Amount. Respondent shall also allow representatives of the TCEQ access to the site of any work being financed in whole or in part by the SEP Offset Amount. This provision shall survive the termination of this Agreed Order. City of Seadrift Docket No. 2020-0890-MWD-E Attachment A

# 5. Failure to Fully Perform

If Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 through 4 above, the Executive Director ("ED") may require immediate payment of all or part of the SEP Offset Amount as set forth in the attached Agreed Order.

In the event the ED determines that Respondent failed to fully implement and complete the Project, Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for reimbursement of a SEP, shall make the check payable to "Texas Commission on Environmental Quality," and shall mail it to:

> Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 P.O. Box 13087 Austin, Texas 78711-3087

# 6. Publicity

Any public statements concerning this Project made by or on behalf of Respondent must include a clear statement that **the Project was performed as part of the settlement of an enforcement action brought by the TCEQ**. Such statements include advertising, public relations, and press releases.

# 7. Recognition

Respondent may not seek recognition for this project in any other state or federal regulatory program.

# 8. Other SEPs by TCEQ or Other Agencies

The SEP Offset Amount identified in this Attachment A and in the attached Agreed Order has not been, and shall not be, included as a SEP for Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.