Order Type:

1660 Agreed Order

Findings Order Justification:

N/A **Media:** MWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

City of Junction WWTF, located north of and adjacent to Farm-to-Market Road 2169, approximately 0.4 mile northeast of the intersection of Farm-to-Market Road 2169 and IH-10, Junction, Kimble 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: February 28, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$38,868

Amount Deferred for Expedited Settlement: \$7,773

Total Paid to General Revenue: \$31,095 Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014 and January 28, 2021

Investigation Information

Complaint Date(s): N/A **Complaint Information:** N/A

Date(s) of Investigation: September 22, 2020 and September 29, 2021 through

September 30, 2021

Date(s) of NOE(s): November 20, 2020 and November 18, 2021

Violation Information

- 1. Failed to ensure all operators at the Facility have the required occupational license. Specifically, the chief operator was operating with a license that expired on April 25, 2020 [30 Tex. Admin. Code §§ 30.350(d) and 305.125(1) and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010199001, Other Requirements No. 1].
- 2. Failed to comply with recommended sampling and testing methods. Specifically, the dissolved oxygen meter was not being calibrated prior to use [30 Tex. ADMIN. CODE §§ 305.125(1) and 319.11 and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 2.a].
- 3. Failed to maintain monitoring and reporting records at the Facility. Specifically, pH meter calibration records, daily operational logs, maintenance logs, and procedural logs were not being maintained [30 Tex. Admin. Code §§ 305.125(1), (11)(C), and 319.7(a), and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.b and Operational Requirements No. 1].
- 4. Failed to properly dispose of bar screenings resulting in a discharge of municipal waste. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area [30 Tex. Admin. Code §§ 305.125(1) and 317.4(b)(4), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0010199001, Permit Conditions No. 2.g].
- 5. Failed to maintain monitoring and reporting records at the Facility. Specifically, the identity of who was conducting flow measurements was not being recorded [30 Tex. Admin. Code §§ 305.125(1) and (11)(C) and 319.7(a) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.c].
- 6. Failed to ensure the Facility and all of its systems of collection, treatment, and disposal were properly operated and maintained. Specifically, trees were growing on the inside of the embankments of Pond Nos. 1 and 5, which could allow seepage of partially treated wastewater through the liner [30 Tex. Admin. Code § 305.125(1) and (5) and TPDES Permit No. WQ0010199001, Other Requirements No. 3].
- 7. Failed to maintain monitoring and reporting records at the Facility. Specifically, supporting documents for discharge monitoring reports ("DMRs") such as lab reports and chain of custodies were not retained [30 Tex. ADMIN. CODE §§ 305.125(1) and (11)(C) and 319.7(a) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.b].
- 8. Failed to timely submit monitoring results at intervals specified in the permit. Specifically, the DMRs for the monthly monitoring periods of November 2020 and January, April, and August 2021 were not submitted by the 20th day of the following month [30 Tex. Admin. Code §§ 305.125(1) and (17) and 319.7(d) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 1].

- 9. Failed to maintain monitoring and reporting records at the Facility. Specifically, the influent flow records of flow measurements were not being maintained [30 Tex. ADMIN. CODE §§ 305.125(1) and (11)(B) and 319.7(a) and TPDES Permit No. WQ0010199001, Other Requirements No. 4].
- 10. Failed to maintain monitoring and reporting records at the Facility. Specifically, the dissolved oxygen, effluent flow, and dissolved oxygen meter calibration records were not being maintained [30 Tex. Admin. Code §§ 305.125(1) and (11)(B) and 319.7(a) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.b].
- 11. Failed to obtain approval to utilize any chemical disinfection not discussed in 30 Tex. Admin. Code ch. 217. Specifically, pool chlorine tablets were being used for disinfection without prior approval [30 Tex. Admin. Code §§ 217.282 and 217.7(b)(2)].
- 12. Failed to provide certification by a Texas Licensed Professional Engineer that the completed pond lining meets the appropriate criteria prior to utilization. Specifically, the Respondent failed to provide certifications for all three oxidation ponds [30 Tex. Admin. Code § 305.125(1) and TPDES Permit No. WQ0010199001, Other Requirements No. 3].
- 13. Failed to provide the required alarm system. Specifically, the lift station adjacent to the Facility did not have an operational audio-visual alarm [30 Tex. ADMIN. CODE § 317.3(e)(5)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective measures:

- a. By October 30, 2020:
- i. Updated procedures and conducted employee training to ensure adequate quality control measures are implemented, including but not limited to calibrating the dissolved oxygen meter prior to use;
- ii. Began retaining all supporting documents for DMRs; and
- iii. Began recording pH calibration measures.
- b. By November 6, 2020, began maintaining daily operational logs, maintenance logs, and procedural logs;
- c. By January 27, 2021, renewed the chief operator's occupational license; and

d. By September 21, 2021, submitted the DMRs for the monthly monitoring periods of November 2020 and January, April, and August 2021.

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days:
- i. Develop and implement procedures to ensure:
- 1. Records are maintained in accordance with permit requirements, including but not limited to influent and effluent flow records, dissolved oxygen and dissolved oxygen calibration records, and the identity of the individual taking samples and measurements:
- 2. Bar screenings are properly disposed of in a covered container; and
- 3. Proper maintenance of vegetation around the retention ponds.
- ii. Clean up the screenings on the ground in the surrounding area;
- iii. Remove trees and large vegetation from the embankments of Pond Nos. 1 and 5;
- iv. Install an approved disinfection system at the Facility;
- v. Conduct an evaluation of the Facility by a Texas Licensed Professional Engineer in order to meet the requirements of the liner certification for the three oxidation ponds; and
- vi. Repair/replace the lift station audio-visual alarm adjacent to the Facility.
- b. Within 45 days, submit written certification to demonstrate compliance with a.
- c. Within 180 days, have the liners of Pond Nos. 1 and 5 re-certified by a Texas Licensed Professional Engineer.
- d. Within 195 days, submit written certification to demonstrate compliance with c.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Harley Hobson, Enforcement Division, Enforcement Team 1, MC 219, (512) 239-1337; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: The Honorable Russell Hammonds, Mayor, City of Junction, 730 Main

Street, Junction, Texas 76849 **Respondent's Attorney:** N/A

Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PAYABLE PENALTY

PCW Revision March 26, 2014

\$18,151

	/ (
TCEQ_								
DATES	Assigned	23-Nov-2020					<u>-</u>	
	PCW	1-Dec-2020	Screening 30-	-Nov-2020	EPA Due			
RESPO	NDENT/FACILI							
	Respondent	City of Junction	(PCW No. 1 of 2)					
	g. Ent. Ref. No.							
Facili	ity/Site Region	8-San Angelo			Major/I	Minor Source	Minor	
CASE I	NFORMATION							
En	f./Case ID No.				No.	of Violations	7	
	Docket No.	2020-1533-MWI	D-E			Order Type	1660	
Med	dia Program(s)					t/Non-Profit		
	Multi-Media				Enf.		Harley Hobson	
				-		EC's Team	Enforcement Te	eam 1
Adı	min.Penalty \$	Limit Minimum	\$0 Ma :	ximum	\$25,000			
			Penalty	Calculat	tion Secti	on		
			•			011		
IOIA	L BASE PENA	LIY (Sum of	violation bas	se penait	ies)		Subtotal 1	\$18,750
ADIII	CTMENTS / L	/) TO CURT	OTAL 1					
ADJU	STMENTS (+		OTAL 1 g the Total Base Penal	ty (Subtotal 1)) by the indicated	norcontago		
	Compliance Hi		g the Total base Felial	24.0%	Adjustment		tals 2, 3, & 7	\$4,500
	compliance in	-					1	Ψ-,500
	Notes		or one month of se	•				
	Notes	with dissim	ilar violations, and	d one order	with a denial of	of liability.		
							_	
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Re	espondent does no	ot meet the	culpability crit	eria.		
							_	
	Good Faith Eff	ort to Comply T	otal Adjustmen	ts			Subtotal 5	-\$562
	F	. C.L		0.00/			Culturate LC	±0
	Economic Ben	Total EB Amounts	#2.14E		Enhancement* d at the Total EB \$	Amount	Subtotal 6	\$0
	Estimated	Cost of Compliance	\$2,145 \$6,672	Саррес	rat the rotar LD \$	Amount		
			\$0707 L					
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$22,688
	0. 002.017.					•	mar Subtotur	Ţ /
OTHE	D FACTORS	S HISTICE N	AY REQUIRE		0.0%		Adjustment	\$0
	or enhances the Fina				0.0 70		Aujustillelit	Ψ.
		, , , , , , , , , , , , , , , , , , , ,					1	
	Notes							
	110000							
						Final Per	nalty Amount	\$22,688
						i mai i ci	idity Amount	Ψ22/000
CTAT	UTORY LIMI	LADILICTME	uт			Einel Acce	seed Donalty	\$22,688
JIAI	OTOKI LIMI	I ADJUSTINEI	TI			rinai ASSE	ssed Penalty	\$22,000
DEEL	DDAI			Г	20.00/	Dadoutton	A di	#4 F27
DEFE		analty by the indicate	d porcontage		20.0%	Reduction	Adjustment	-\$4,537
Reduces	the Final Assessed Pe	marcy by the murcate	u percentage.				1	
	NI a t		Deferral offered fo	or ovpodite	deattlement			
	Notes		Deferral offered fo	or expedited	settiement.			

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Respondent City of Junction (PCW No. 1 of 2)

Case ID No. 60115

Reg. Ent. Reference No. RN101920288

Media Water Quality

Enf. Coordinator Harley Hobson

	Compliance History Worksheet										
>> Compliance History Site Enhancement (Subtotal 2)											
	Component	Number of	Number	Adjust.							
	NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%							
		Other written NOVs	2	4%							
		Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%							
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%							
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%							
	and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%							
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%							
	Emissions	Chronic excessive emissions events (number of events)	0	0%							
	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)			0%							
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)		0%							
		<u> </u>									
		onmental management systems in place for one year or more No		0%							
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%							
		Participation in a voluntary pollution reduction program	No	0%							
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%							
		Adjustment Per	centage (Sub	total 2) 24%							
>> R	Repeat Violator	(Subtotal 3)									
	No	Adjustment Per	centage (Sub	ototal 3) 0%							
>> C	_	ory Person Classification (Subtotal 7)									
	Satisfactory	Performer Adjustment Per	centage (Sub	ototal 7) 0%							
>> C	Compliance Hist	ory Summary									
	Compliance History Notes	Enhancement for one month of self-reported effluent violations, one NOV with violations, and one order with a denial of liability.	n dissimilar								
		Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7) 24%							
>> Fir	nal Compliance	History Adjustment									
		Final Adjustment Percent	age *capped	at 100% 24%							

9	Screening Date			t No. 2020-1533-MWD-E	PCW
	•	City of Junction (PCW I	No. 1 of 2)		Policy Revision 4 (April 201
	Case ID No.				PCW Revision March 26, 20.
Reg. Ent.	. Reference No.				
F.		Water Quality			
E	nf. Coordinator Violation Number				
	Rule Cite(s)	30 Tex. Admin. Code Elimination System (§§ 30.350(d) and 305. "TPDES") Permit No. W No. 1	125(1) and Texas Pollutant E Q0010199001, Other Requir	Discharge rements
Vio	plation Description			ave the required occupationa g with a license that expired	
				Base	Penalty \$25,00
>> Enviror	nmental, Proper	rty and Human He			
	· · · · · ·	Hai	m		
OR	Release Actual	Major Mode	rate Minor		
	Potential			Percent 5.0%	
		<u> </u>		3.370	
>>Progran	mmatic Matrix				
	Falsification	Major Mode	rate Minor		
				Percent 0.0%	
				to significant amounts of po ealth or environmental recep	
	<u></u>				
				Adjustment	\$23,750
					\$1,25
Violation E	vents				
	Number of \	/iolation Events 3		Number of violation of	tave
	Number of V	Violation Events 3		Number of violation (iays
		daily weekly monthly			
		quarterly x		Violation Base	Penalty \$3,75
		semiannual			
		annual			
		single event			
	Three quart		ended, from the April 2 e November 30, 2020 s	25, 2020 date the operator's creening date.	license
Good Faith	Efforts to Com	ply 10	0.0%		Reduction \$37
Jood Fulti		Before NO			фэ
		Extraordinary			
		Ordinary	Х		
		N/A			
		Notes	The Respondent achie January 27	· ·	
				Violation	Subtotal \$3,33
Economic E	Benefit (EB) for	this violation		Statutory Limit	Test
				-	
	Estimate	ed EB Amount	\$195	Violation Final Pena	ilty Total \$4,2
	Estimate			Violation Final Pena	

	Economic Benefit Worksheet											
Respondent	City of Junctio	n (PCW No. 1 of 2	2)									
Case ID No.	60115											
Reg. Ent. Reference No.	RN101920288											
Media	Water Quality					Percent Interest	Years of					
Violation No.	1					Percent Interest	Depreciation					
						5.0	15					
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount					
Item Description		•										
200 2000												
Delayed Costs												
Equipment				0.00	\$0	\$0	\$0					
Buildings				0.00	\$0	\$0	\$0					
Other (as needed)				0.00	\$0	\$0	\$0					
Engineering/Construction				0.00	\$0	\$0	\$0					
Land				0.00	\$0	n/a	\$0					
Record Keeping System				0.00	\$0	n/a	\$0					
Training/Sampling				0.00	\$0	n/a	\$0					
Remediation/Disposal				0.00	\$0	n/a	\$0					
Permit Costs				0.00	\$0	n/a	\$0					
Other (as needed)	\$186	22-Sep-2020	27-Jan-2021	0.35	\$3	n/a	\$3					
Notes for DELAYED costs	Estimated	•		•	r's occupational lice Date is the date o	ense. The Date Rec f compliance.	uired is the					
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoide						
Disposal				0.00	\$0	\$0	\$0					
Personnel				0.00	\$0	\$0	\$0					
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0					
Supplies/Equipment				0.00	\$0	\$0	\$0					
Financial Assurance				0.00	\$0	\$0	\$0					
ONE-TIME avoided costs	\$186	25-Apr-2020	30-Nov-2020	0.60	\$6	\$186	\$192					
Other (as needed)				0.00	\$0	\$0	\$0					
Notes for AVOIDED costs			•		•	equired occupationa Final Date is the scr						
Approx. Cost of Compliance		\$372			TOTAL							

	Scre	ening Date	30-Nov-2020		Doc	ket No. 2020-1533	3-MWD-E	PCW
		•	City of Junction	(PCW No. 1 o	f 2)		Polic	y Revision 4 (April 2014)
		ase ID No.					PCW	Revision March 26, 2014
Reg.	Ent. Ref		RN101920288					
			Water Quality					
			Harley Hobson	1				
	Viola	ation Number						1
		Rule Cite(s)				and 319.11 and TPDE		
			WQ00)10199001, M	onitoring and F	Reporting Requiremer	its No. 2.a	
			Failed to comp	ly with recomr	nandad campli	ng and testing metho	nds Specifically the	
	Violatio	n Description				being calibrated prio		
				, , , , , ,				
								_
							Base Penalty	\$25,000
		_					2000 1 0,	1-0/000
>> Env	/ironme	ntal, Proper	ty and Hum		Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual		Hoderate	MINO			
		Potential			Х	Percent	3.0%	
>>Prog	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor	Davaant [0.00/	
						Percent	0.0%	
								1
	Matrix					ed to insignificant am		
	Notes	that would no	ot exceed levels		ctive of numar of the violation	n health or environme In	ental receptors as a	
				result	or the violation	11.		
						Adjustment	\$24,250	1
							Ψ2.1/200	
								\$750
Violatio	on Event	ts						
		Number of \	/iolation Events	1		38 Number of	f violation days	
			doily					
			daily weekly					
			monthly					
			quarterly			Viola	ation Base Penalty	\$750
			semiannual				•	
			annual					
			single event	Х				
								1
				One single	event is recom	mended.		
Good F	aith Eff	orts to Com	nly	25.0%			Reduction	\$187
dood i	aitii Liit	orts to com			NOE/NOV to EDP	RP/Settlement Offer	Reduction	4107
			Extraordinary					
			Ordinary	х				
			N/A					
				The F	Respondent ac	hieved compliance on		
			Notes		•	30, 2020.		
							Violation Subtotal	\$563
Econon	nic Bene	fit (EB) for	this violation	on		Statuto	ry Limit Test	
					¢1			#742
		EStimate	ed EB Amount		\$1		Final Penalty Total	
				This viol	ation Final A	ssessed Penalty (a	djusted for limits)	\$743

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Junctio	n (PCW No. 1 of 2	2)				
Case ID No.	60115						
Reg. Ent. Reference No.	RN101920288						
Media	Water Quality					Percent Interest	Years of
Violation No.	2					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
20011 2 00011 4 01011							
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 \$0	n/a	\$0
Record Keeping System Training/Sampling	\$250	22-Sep-2020	30-Oct-2020	0.00	\$0 \$1	n/a n/a	\$0 \$1
Remediation/Disposal	\$230	22-3ep-2020	30-001-2020	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	quality cont	rol measures are	implemented, ir	cluding) but not limited to estigation date, an	ployee training to en calibrating the diss d the Final Date is t	olved oxygen
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	<u> </u>	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 ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs		1		0.00	<u> </u>	\$0	\$0
Approx. Cost of Compliance		\$250			TOTAL		\$1

Screening Date	30-Nov-2020	Docket No. 2020-1533-MWD-E	PCW
•	City of Junction (PCW No. 1 of	2) Policy	Revision 4 (April 2014)
Case ID No.		PCW F	Revision March 26, 2014
Reg. Ent. Reference No.			
	Water Quality		
Enf. Coordinator			
Violation Number			
Rule Cite(s)	30 Text Marinin Code 33 30311	125(1), (11)(C), and 319.7(a), and TPDES Permit No.	
	WQ0010199001, Monitoring a	and Reporting Requirements No. 3.b and Operational Requirements No. 1	
		Requirements No. 1	
	Failed to maintain monitoring	and reporting records at the Facility. Specifically, pH	
Violation Description		ly operational logs, maintenance logs, and procedural	
	•	were not being maintained.	
		Page Benefity	¢2E 000
		Base Penalty	\$25,000
>> Environmental, Proper	ty and Human Health M	Matrix Matrix	
	Harm		
OR Release	Major Moderate	Minor	
Potential		Percent 0.0%	
rotential		Percent 0.0%	
>>Programmatic Matrix			
Falsification	Major Moderate	Minor	
	Х	Percent 5.0%	
			1
Matrix			
Notes	100% of the rule	requirement was not met.	
		Adjustment \$23,750	
		, in justilion	
			\$1,250
Violation Events			
Violation Events			
Number of \	/iolation Events 1	69 Number of violation days	
	daily		
	weekly		
	monthly	Walatian Basa Banaka	*1 250
	quarterly x	Violation Base Penalty	\$1,250
	semiannual annual		
	single event		
	Single event		
One guarte	rly event is recommended from	n the September 22, 2020 investigation date to the	
Offe quarte		, 2020 screening date.	
		,g -===:	
Good Faith Efforts to Com	ply 0.0%	Reduction	\$0
Good Faith Enorts to com		NOE/NOV to EDPRP/Settlement Offer	ΨΟ
	Extraordinary		
	Ordinary		
	N/A x		
	The B	at deep met manet the count forth and the	
	Notes The Responder	nt does not meet the good faith criteria for	
	Notes The Responder	nt does not meet the good faith criteria for this violation.	
	Notes The Responder	this violation.	¢1 2EA
	Notes	this violation. Violation Subtotal	\$1,250
Economic Benefit (EB) for	Notes	this violation.	\$1,250
	Notes	this violation. Violation Subtotal	\$1,250 \$1,550
	this violation	this violation. Violation Subtotal Statutory Limit Test	

	E	conomic	Benefit	Wo	rksheet						
Respondent	City of Junction	n (PCW No. 1 of 2	2)								
Case ID No.	60115										
Reg. Ent. Reference No.	RN101920288										
	Water Quality					Percent Interest	Years of				
Violation No.	3						Depreciation				
						5.0	15				
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount				
Item Description											
Delayed Costs	T	11		1 0 00	+0	+0	+0				
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$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	\$50	22-Sep-2020	30-Oct-2020	0.10	\$0	n/a	\$0				
Record Keeping System	\$50	22-Sep-2020	6-Nov-2020	0.12	\$0	n/a	\$0				
Remediation/Disposal				0.00	\$0	n/a	\$0				
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0				
Notes for DELAYED costs	the investi	Estimated Record Keeping System cost to begin recording pH calibration measures. The Date Required is the investigation date, and the Final Date is the date of the pH calibration measures were recorded. Estimated Record Keeping System cost to begin maintaining daily operational logs, maintenance logs, and procedural logs. The Date Required is the investigation date, and the Final Date is the date the daily operational logs, maintenance logs, and procedural logs were maintained.									
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	ntering	item (except for	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 Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0				
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0				
Other (as needed)				0.00	\$0	\$0	\$0				
Notes for AVOIDED costs		'		,,	, , , , , , , , , , , , , , , , , , ,						
Approx. Cost of Compliance		\$100			TOTAL		\$0				

Respondent City of Junction (PCW No. 1 of 2) Reg. Ent. Reference No. 80115 Reg. Ent. Reference No. 80101502288 Media Water Quality Enf. Coordinator Indrev Hobern Violation Number Rule Cite(1) Violation Description Violation Description Violation Description Violation Description Regionate Misjor Major Moderate Minor Percent 5.0% >> Environmental, Property and Human Health Matrix Release Misjor Moderate Minor Percent 5.0% >> Proof and the Environmental Matrix Fasilication Misjor Moderate Minor Percent 5.0% Motrix Notes Misjor Moderate Minor Percent 5.0%			ening Date			2020-1533-MWD-E	PC	CW
Reg. Ent. Reference No. Millo1920288 Media Water Quality Enf. Coordinator Harley Hobson Violation Number Rule Cite(s) 3 Tex. Admin. Code § 3105.125(1) and 317.4(b)(4), Tex. Water Code § 5 (6.121(a)(1), and TPDES Fermit, No. WQ001013901), Permit Conditions No. 2.g Faliat to properly dispose of bar excensings resulting in a displange of municipal wasels. Specifically, there was a less of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area. Percent S.0% >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Percent 0.0% Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Matrix Matrix Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Matrix Matrix Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Matrix Matrix Matri					f 2)		Policy Revision 4 (April 2	2014)
Media Water Quality Fair. Coordinator Harey Hobson	_						PCW Revision March 26,	2014
Violation Number Autory Code Sp Sp Sp Sp Sp Sp Sp S	Reg.	Ent. Ref						
Violation Number 4 Rule Cite(s) 30 Tex. Admin. Code §§ 305.125(1) and 317.4(b)(4), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0010199001, Permit Conditions No. 2.g Failed to properly dispose of bar screenings resulting in a discharge of municipal waste. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area. See Penalty Septimically, there was a lack of tight-fitting covers to reduce vector access to screenings on the ground in the surrounding area. Percent 5.0% Septimically Major Moderate Minor Percent 0.0% Percent 5.0% Selfication Major Moderate Minor Percent 0.0% Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$23,750 Violation Events Number of Violation Events 69 Number of violation days diality weekly				- ,				
Rule Cite(s) 30 Tex. Admin. Code §§ 305.125(1) and 317.4(b)(4), Tex. Water Code § 26.121(a)(11), and TPDES Permit No. WQ0010199001, Permit Conditions No. 2, g Failed to properly dispose of bear screenings resulting in a discharge of municipal waste. Specifically, there was a lock of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area. **Septimental, Property and Human Health Matrix** Harman Release Major Moderate Minor								
Violation Description See Penalty Failed to properly dispose of bar screenings resulting in a discharge of municipal waste. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Percent S.0% >> Programmatic Matrix Notes Number of Violation Major Matrix Notes Adjustment \$23,750 \$1,250 \$1,250 \$1,250 Violation Events One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Feet working of the september 22, 2020 investigation date to the November 30, 2020 screening date. Feet working of the September 22, 2020 investigation date to the November 30, 2020 screening date. Feet working of the September 30, 2020 screening date. Violation Subtotal The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$55B} Violation Final Penalty Total \$1,250		Viola		4				
Violation Description Failed to properly dispose of bar screenings resulting in a discharge of municipal wate. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings attend in the containers and screenings on the ground in the surrounding alea. **Sease Penalty** **Sease Penalty** **Sease Penalty** **Sease Penalty** **Percent** **Sease Penalty** *			Rule Cite(s)	30 Tex. Admin. Code §§	305.125(1) and 317.4	(b)(4), Tex. Water Code §		
Violation Description waste. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Harm				26.121(a)(1), and TPDES P	ermit No. WQ00101990	001, Permit Conditions No.	2. g	
Violation Description waste. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Harm								
Violation Description waste. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Harm				Failed to properly dispose of	of bar screenings resulti	ng in a discharge of munic	<mark>ripal ripal ripal</mark>	
Screenings stored in the containers and screenings on the ground in the surrounding area. Base Penalty \$25,000		Violatio	n Description	waste. Specifically, there was	a lack of tight-fitting co	overs to reduce vector acc	<mark>ess to</mark>	
Sase Penalty \$25,000		Violatio	Description	screenings stored in the cont		n the ground in the surrou	<mark>inding</mark>	
>> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Moderate Minor Moderate Minor Percent 5.0%					area.			
>> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Moderate Minor Moderate Minor Percent 5.0%								
Release Major Harm Actual Percent \$5.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Violation Events						Base Pe	enalty \$25	,000
Release Major Harm Actual Percent \$5.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Violation Events	>> Env	/ironme	ntal, Propei	tv and Human Health	Matrix			
Percent 5.0% Potential								
>>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$23,750 \$1,250 Violation Events Number of Violation Events 1 69 Number of violation days daily weekly monthly quarterly x semiannual annual single event 1 srecommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Reduction Source November 30, 2020 screening date. Good Faith Efforts to Comply 1 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 1 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 2 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 3 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 3 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 3 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 3 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 4 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 5 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 5 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 5 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 5 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 5 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 6 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 6 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 6 0.0% November 30, 2020 screening date. Good Faith Efforts to Comply 6 0.0% November 30, 2020 screening date.					Minor			
>>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Matrix Notes Percent 0.0% Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$23,750 \$1,250 Violation Events Number of Violation Events 1 69 Number of violation days daily weekly monthly quarterly x semiannual annual single event One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 80.0% before NOE/NOV to EDPREY/Settlement Offer Extraordinary Ordinary N/A X Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation \$58 Violation Final Penalty Total \$1,550	OR				X	-		
Falsification Major Moderate Minor Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. **Adjustment** \$23,750 \$1,250 Violation Events Number of Violation Events Number of Violation Events			Potential			Percent 5.0%		
Falsification Major Moderate Minor Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. **Adjustment** \$23,750 \$1,250 Violation Events Number of Violation Events Number of Violation Events	>> Dro	aramma	tic Matrix					
Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. **Adjustment** **Adjustment** **\$23,750* **\$1,250* **\$1,250* Violation Events** Number of Violation Events** Number of Violation Events** **One quarterly x semiannual annual single event singl	//P100	yı allılıla		Major Moderate	Minor			
Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$23,750 \$1,250 Violation Events Number of Violation Events 1 69 Number of violation days daily weekly			. diomication	1.030.		Percent 0.0%		
Violation Events Number of Violation Events Violation Base Penalty \$1,250 Semiannual annual single event November 30, 2020 screening date. Good Faith Efforts to Comply 80,09% 8000 Faith Efforts to Comply 8000 Faith Efforts to Compl			<u> </u>	'				
Notes Notes Notes Notes Number of violation Number of vi			Human health	or the environment has beer	exposed to insignifican	t amounts of pollutants th	at do	
Adjustment \$23,750 \$1,250 Violation Events Number of Violation Events 1 69 Number of violation days daily						·		
Violation Events Number of Violation Events 1 69 Number of violation days daily weekly monthly quarterly x semiannual annual single event One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550		Notes			violation.			
Violation Events Number of Violation Events 1 69 Number of violation days daily weekly monthly quarterly x semiannual annual single event One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550			Į l					
Violation Events Number of Violation Events 1					Ac	ljustment \$2	3,750	
Violation Events Number of Violation Events 1							\$1	.250
Number of Violation Events 1 69 Number of violation days daily							Ψ1	.,250
daily weekly monthly quarterly semiannual annual single event One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550	Violatio	on Event	ts					
daily weekly monthly quarterly semiannual annual single event One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550			Ni. mala an af N	(inlation Frants		7N	_	
weekly monthly wonthly warterly semiannual annual single event with the November 30, 2020 screening date. One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550			Number of v	riolation Events 1	69	Number of violation days	5	
weekly monthly wonthly warterly semiannual annual single event with the November 30, 2020 screening date. One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550				daily				
Monthly quarterly semianual annual single event One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply Ordinary Ordinary Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,250				·				
Semiannual annual single event One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$1,550								
One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply D.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$1,550				quarterly x		Violation Base Pe	enalty \$1	,250
One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply O.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$1,550				semiannual				
One quarterly event is recommended, from the September 22, 2020 investigation date to the November 30, 2020 screening date. Good Faith Efforts to Comply O.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550				annual				
Good Faith Efforts to Comply O.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$1,550				single event				
Good Faith Efforts to Comply O.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$1,550								
Good Faith Efforts to Comply Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550			One quarte			_	<mark>the </mark>	
Extraordinary Ordinary N/A X Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation \$58 Violation Final Penalty Total \$1,550				November 3	0, 2020 screening date.			
Extraordinary Ordinary N/A X Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation \$58 Violation Final Penalty Total \$1,550		=						+0
Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550	G000 F	aith Effe	orts to Com		NOF/NOV to EDPPP/Settlem		uction	\$ ¹ U
Ordinary N/A					NOL/NOV to EDPRP/Settlem			
Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550				·		-		
Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550				·				
Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550								
Violation Subtotal \$1,250 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$58 Violation Final Penalty Total \$1,550				Notes The Responde	_	good faith criteria for		
Economic Benefit (EB) for this violation Statutory Limit Test Violation Final Penalty Total \$1,550					this violation.			
Economic Benefit (EB) for this violation Statutory Limit Test Violation Final Penalty Total \$1,550				<u> </u>				252
Estimated EB Amount \$58 Violation Final Penalty Total \$1,550						Violation Sul	ototal \$1	,250
	Econon	nic Bene	efit (EB) for	this violation		Statutory Limit Te	st	
			Estimate	ed EB Amount	\$58	Violation Final Penalty	Total \$1	,550
This violation Final Assessed Penalty (adjusted for limits) \$1,550				·		_		
				This viol	ation Final Assessed	renalty (adjusted for li	mits) \$1	,550

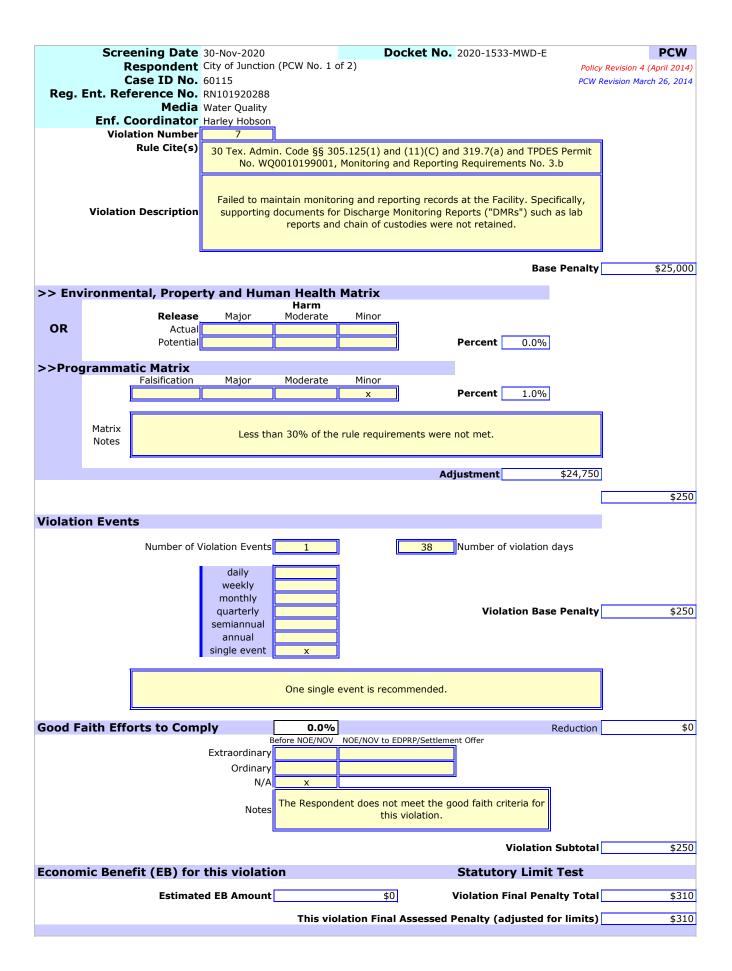
	E	conomic	Benefit	Wo	rksheet			
Respondent	City of Junctio	n (PCW No. 1 of 2	2)					
Case ID No.	60115							
Reg. Ent. Reference No.	RN101920288							
	Water Quality					D	Years of	
Violation No.						Percent Interest	Depreciation	
						5.0	15	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount	
Item Description								
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	+250	22.6. 2020	20.4 2025	0.00	\$0	n/a	\$0	
Other (as needed)	\$250	22-Sep-2020	30-Apr-2025	4.61	\$58	n/a	\$58	
Notes for DELAYED costs	Estimated delayed cost to develop and implement procedures to ensure bar screenings are properly disposed of in a covered container and clean up the screenings on the ground in the surrounding area. The Date Required is the investigation date, and the Final Date is the estimated date of compliance.							
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	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		\$250			TOTAL		\$58	

	Scre	ening Date	30-Nov-2020			ket No. 2020-1533-MWD-E		PCW
			City of Junction	(PCW No. 1 o	f 2)		Policy R	evision 4 (April 2014)
		Case ID No.					PCW Rev	vision March 26, 2014
Reg.	Ent. Ref	erence No.						
			Water Quality					
			Harley Hobson	a				
	Viol	ation Number	5					
		Rule Cite(s)				11)(C) and 319.7(a) and TPDES F I Reporting Requirements No. 3.c		
	Violatio	n Description				g records at the Facility. Specifical asurements was not being record		
_	_					Base F	enalty	\$25,000
>> Env	vironme	ntal, Proper	ty and Hum		Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual		rioderate				
		Potential				Percent 0.0%		
		'						
>>Pro	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor	Percent 1.0%		
					Х	Percent 1.0%		
	Matrix Notes		Less th	an 30% of the	rule requireme	ents were not met.		
						Adirothycont	24 750	
						Adjustment	24,750	
								\$250
	_							
Violatio	on Even	ts						
		Number of \	iolation Events	1		Number of violation day	ys	
			daily weekly					
			monthly					
			quarterly			Violation Base F	enalty	\$250
			semiannual					
			annual					
			single event	X				
				One single e	event is recom	mended.		
	==							·
Good F	aith Effe	orts to Com		0.0% Before NOE/NOV	NOE/NOV to EDD	RP/Settlement Offer	duction	\$0
			Extraordinary	Before NOE/NOV	NOE/NOV to EDP	RP/Settlement Offer		
			Ordinary					
			N/A	х				
			14/74					
			Notes	The Kesponde		leet the good faith criteria for olation.		
						Violation So	ubtotal	\$250
Econon	nic Bene	efit (EB) for	this violation	on		Statutory Limit T	est	
		Estimate	ed EB Amount		\$12	Violation Final Penalt	y Total	\$310
				i nis viol	ation Final A	ssessed Penalty (adjusted for	iimits)	\$310

	E	conomic	Benefit	Wo	rksheet		
		n (PCW No. 1 of 2	2)				
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.	Water Quality 5					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
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	\$50	22-Sep-2020	30-Apr-2025	4.61	\$12	n/a	\$12
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	identity of wh	o conducts flow m	neasurements is	record	ed in accordance v	uct employee trainin with permit requirem mated date of comp	ents. The Date
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$50			TOTAL		\$12

Case ID No. 601 Reg. Ent. Reference No. RN1 Media Wat Enf. Coordinator Har Violation Number Rule Cite(s) Violation Description	ter Quality ley Hobson 6 Tex. Admin. Code § 305.125 Ot Failed to ensure the Facility apposal were properly operated	2) 5(1) and (5) and TPDES Permit No. WQ001 ther Requirements No. 3 and all of its systems of collection, treatment d and maintained. Specifically, trees were g	PCW Revisio	ion 4 (April 2014) in March 26, 2014
Reg. Ent. Reference No. RN1 Media Wat Enf. Coordinator Har Violation Number Rule Cite(s) Violation Description	ter Quality ley Hobson 6 Tex. Admin. Code § 305.125 Ot Failed to ensure the Facility apposal were properly operated	ther Requirements No. 3 and all of its systems of collection, treatmen	0199001,	n marcn 26, 2014
Media Wat Enf. Coordinator Har Violation Number Rule Cite(s) Violation Description	ter Quality ley Hobson 6 Tex. Admin. Code § 305.125 Ot Failed to ensure the Facility a posal were properly operated	ther Requirements No. 3 and all of its systems of collection, treatmen		
Violation Number Rule Cite(s) Violation Description	Tex. Admin. Code § 305.125 Ot Failed to ensure the Facility a	ther Requirements No. 3 and all of its systems of collection, treatmen		
Rule Cite(s) 30	Tex. Admin. Code § 305.125 Ot Failed to ensure the Facility a	ther Requirements No. 3 and all of its systems of collection, treatmen		
Violation Description disp	Ot Failed to ensure the Facility a posal were properly operated	ther Requirements No. 3 and all of its systems of collection, treatmen		
Violation Description disp	Failed to ensure the Facility a	and all of its systems of collection, treatmer	nt, and	
Violation Description disp	posal were properly operated		nt, and	
		d and maintained. Specifically, trees were g		
II LITE	incide of the embantments	s of Pond Nos. 1 and 5, which could allow se		
		ated wastewater through the liner.	eepage of	
		Base	e Penalty	\$25,000
>> Environmental, Property	and Human Health M	atriv		
>> Environmental, Property	Harm	attix		
OR Release Actual	Major Moderate	Minor		
Potential	Х	Percent 15.0%		
>>Programmatic Matrix Falsification	Major Moderate	Minor		
T distriction	Hajor Hoderate	Percent 0.0%		
Matrix Human health or	the environment will or coul	ld be exposed to pollutants that would exce	ed levels	
Notes that are protection	ctive of human health or env	vironmental receptors as a result of the viol	ation.	
		Adjustment	\$21,250	
Violation Events				\$3,750
				\$3,750
Number of Viels	tion Events	Number of violation	daye	\$3,750
Number of Viola	tion Events 3	69 Number of violation	days	\$3,750
	daily	69 Number of violation (days	\$3,750
	daily weekly	69 Number of violation of	days	\$3,750
	daily	69 Number of violation of Violation Base	· 	\$3,750 \$11,250
i c	daily weekly monthly quarterly emiannual		· 	· ·
c se	daily weekly monthly quarterly emiannual annual		· 	· ·
c se	daily weekly monthly quarterly emiannual		· 	· ·
sir	daily weekly monthly quarterly emiannual annual ngle event		e Penalty	· ·
sir	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror	Violation Base	e Penalty	· ·
sir Three monthly ev	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30,	Violation Base m the September 22, 2020 investigation da 2020 screening date.	e Penalty	\$11,250
sir	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30,	Violation Base m the September 22, 2020 investigation da 2020 screening date.	e Penalty	· ·
Three monthly ev Good Faith Efforts to Comply	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30,	Violation Base m the September 22, 2020 investigation da 2020 screening date.	e Penalty	\$11,250
Three monthly ev Good Faith Efforts to Comply	daily weekly monthly x quarterly emiannual annual ngle event vents are recommended, fror November 30, 0.0% Before NOE/NOV NO traordinary Ordinary	Violation Base m the September 22, 2020 investigation da 2020 screening date.	e Penalty	\$11,250
Three monthly ev Good Faith Efforts to Comply	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30, 0.0% Before NOE/NOV NC	Violation Base m the September 22, 2020 investigation da 2020 screening date.	e Penalty	\$11,250
Three monthly ev Good Faith Efforts to Comply	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30, 0.0% Before NOE/NOV NO traordinary Ordinary N/A x	withe September 22, 2020 investigation da 2020 screening date. DE/NOV to EDPRP/Settlement Offer t does not meet the good faith criteria for	e Penalty	\$11,250
Three monthly ev Good Faith Efforts to Comply	daily weekly monthly x quarterly emiannual annual angle event vents are recommended, fror November 30, 0.0% Before NOE/NOV NO traordinary Ordinary N/A x The Respondent	withe September 22, 2020 investigation da 2020 screening date. DE/NOV to EDPRP/Settlement Offer	e Penalty	\$11,250
Three monthly ev Good Faith Efforts to Comply	daily weekly monthly x quarterly emiannual annual angle event vents are recommended, fror November 30, 0.0% Before NOE/NOV NO traordinary Ordinary N/A x The Respondent	with the September 22, 2020 investigation da 2020 screening date. DE/NOV to EDPRP/Settlement Offer this violation.	e Penalty	\$11,250
Three monthly ev Good Faith Efforts to Comply Ex	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30, traordinary Ordinary N/A Notes The Respondent	withe September 22, 2020 investigation da 2020 screening date. DE/NOV to EDPRP/Settlement Offer t does not meet the good faith criteria for this violation. Violation	e Penalty ute to the Reduction	\$11,250 \$0
Three monthly ev Good Faith Efforts to Comply Ex Economic Benefit (EB) for thi	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30, traordinary Ordinary N/A Notes The Respondent s violation	with the September 22, 2020 investigation da 2020 screening date. DE/NOV to EDPRP/Settlement Offer this violation. Violation Statutory Limit	e Penalty Inte to the Reduction Subtotal	\$11,250 \$0 \$11,250
Three monthly ev Good Faith Efforts to Comply Ex	daily weekly monthly quarterly emiannual annual ngle event vents are recommended, fror November 30, traordinary Ordinary N/A x Notes The Respondent s violation B Amount	withe September 22, 2020 investigation da 2020 screening date. DE/NOV to EDPRP/Settlement Offer t does not meet the good faith criteria for this violation. Violation	e Penalty Inte to the Reduction Subtotal Test alty Total	\$11,250 \$0

	E	conomic	Benefit	Wo	rksheet		
Dognandant		n (PCW No. 1 of 2					
	•	1 (PCW NO. 1 01 2	.)				
Case ID No.							
Reg. Ent. Reference No.	RN101920288						
Media	Water Quality					Percent Interest	Years of
Violation No.	6					Percent Interest	Depreciation
110141101111101						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				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$5,000	22-Sep-2020	12-Sep-2025	4.98	\$83	\$1,658	\$1,741
Land	70,000			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	\$500	22-Sep-2020	30-Apr-2025	4.61	\$115	n/a	\$115
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$100	22-Sep-2020	30-Apr-2025	4.61	\$23	n/a	\$23
		<u> </u>	•				
	Estimated E	ngineering/Constr	ruction cost to h	ave the	e liners of Pond No	s. 1 and 5 re-certifie	ed by a Texas
	Licensed Pr	ofessional Engine	er. The Date Re	quired	is the investigation	n date, and the Fina	I Date is the
		•	estimate	d date	of compliance.	,	
	Estimated Re	mediation/Disnos	sal cost to remo	ve tree	s and large vegeta	tion from Pond Nos	1 and 5. The
Notes for DELAYED costs					5 5	stimated date of co	
	Date Ne	quired is the live.	stigation date, a	illu tile	Tillal Date is the e	stillated date of co	inpliance.
							-6b-bi
			•			proper maintenance	
	around th	e retention ponds				date, and the Final	Date is the
			estimate	d date	of compliance.		
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	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							
Notes for Avoided Costs							
Approx. Cost of Compliance		\$5,600			TOTAL		\$1,879
Approx. Cost of Compliance		000,دھ			IUIAL		\$1,0/9



	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60115	n (PCW No. 1 of 2	2)				
Media Violation No.	Water Quality 7					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
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction Land				0.00	\$0	n/a	\$0 \$0
Record Keeping System	\$50	22-Sep-2020	30-Oct-2020	0.10	\$0	n/a	\$0 \$0
Training/Sampling	<u> </u>	22 Sep 2020	<u> </u>	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	Required is th	ne investigation d	ate, and the Fina DMI	al Date Rs were	is the date that all retained.	g documents for DM the supporting doc	uments for the
Avoided Costs	ANNU	ALIZE avoided o	osts before en		<u> </u>	one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0 \$0	\$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0 \$0
Notes for AVOIDED costs				0.00	<u> </u>	3 0	\$0
Approx. Cost of Compliance		\$50			TOTAL		\$0



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

DATES Assigned 23-Nov-2021

 Assigned
 23-Nov-2021

 PCW
 30-Nov-2021

 Screening
 30-Nov-2021

 EPA Due

RESPONDENT/FACILITY INFORMATION
Respondent
Reg. Ent. Ref. No. RN101920288
Facility/Site Region 8-San Angelo

RESPONDENT/FACILITY INFORMATION
Respondent City of Junction (PCW No. 2 of 2)
RN101920288

Major/Minor Source Minor

CASE INFORMATION

Enf./Case ID No. 60115
Docket No. 2020-1533-MWD-E
Media Program(s) Water Quality
Multi-Media

Multi-Media

Admin. Penalty \$ Limit Minimum

SO Maximum

No. of Violations 6
Order Type 1660
Government/Non-Profit Yes
Enf. Coordinator
EC's Team
Enforcement Team 1

		Penalty Calculation Section		
TOTA	AL BASE PENA	LTY (Sum of violation base penalties)	Subtotal 1	\$13,250
ΔDII	ISTMENTS (+	/-) TO SUBTOTAL 1		
ADJU	Subtotals 2-7 are of	tained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.		
	Compliance Hi	story 24.0% Adjustment Subto	tals 2, 3, & 7	\$3,180
	Notes	Enhancement for one month of self-reported effluent violations, one		
	110000	NOV with dissimilar violations, and one order with a denial of liability.		
	Culpability	No 0.0% Enhancement	Subtotal 4	\$0
	,			
	Notes	The Respondent does not meet the culpability criteria.		
	Good Faith Eff	ort to Comply Total Adjustments	Subtotal 5	-\$250
	Economic Ben		Subtotal 6	\$0
	Estimated	Total EB Amounts \$2,604 *Capped at the Total EB \$ Amount Cost of Compliance \$10,500		
		, <u>, , , , , , , , , , , , , , , , , , </u>	_	
SUM	OF SUBTOTA	LS 1-7 F	inal Subtotal	\$16,180
ОТНЕ	ED EACTORS	AS JUSTICE MAY REQUIRE 0.0%	Adjustment	\$0
Reduces	or enhances the Fina	Subtotal by the indicated percentage.	Aujustilient	Ψ0
	Notes			
		Final Pen	alty Amount	\$16,180
			_	
STAT	TUTORY LIMIT	ADJUSTMENT Final Asset	ssed Penalty	\$16,180
DEFE	RRAL	20.0% Reduction	Adjustment	-\$3,236
		nalty by the indicated percentage.	Aujustinent	+5/25 6
		Defermed offered for our edited and blancart		
	Notes	Deferral offered for expedited settlement.		
			I	
PAYA	ABLE PENALT	1		\$12,944

Screening Date 30-Nov-2021

Respondent City of Junction (PCW No. 2 of 2)

Case ID No. 60115

Reg. Ent. Reference No. RN101920288

>>

Media Water Quality

Enf. Coordinator Harley Hobson

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

PCW

Compliance History Worksheet

omponent	Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	2	4%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)		0%
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Audits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
o ci ici	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3)

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one month of self-reported effluent violations, one NOV with dissimilar violations, and one order with a denial of liability.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

Reg.	R C	ase ID No. erence No.	City of Junction (Po 60115 RN101920288	CW No. 2 of 2)	Docket No.	2020-1533-MWD-E		PCW evision 5 (January 28, 2021) / Revision February 11, 2021
	Enf C		Water Quality					
		tion Number	Harley Hobson					
	11014	Rule Cite(s)	30 Tex. Admin. (ation System ("T		319.7(d) and Texas b. WQ0010199001, N s No. 1		
	Violation	Description	Specifically, the di periods of No	scharge monitor vember 2020 an	ing reports ("DMF	rvals specified in the Rs") for the monthly and August 2021 we llowing month.	monitoring	
						Bas	se Penalty	\$25,000
>> Env	/ironmer	ital, Prope	rty and Human		rix			
		Dalanca	Maior	Harm				
OR		Release Actual		1oderate Mi	nor			
		Potential				Percent 0.0%		
				'			1	
>>Prog	gramma	tic Matrix	Mada	4 - d				
	l l	Falsification	Major M		nor x	Percent 1.0%]	
	<u> </u>				^	1.0 /0		
	Matrix Notes		Less than	30% of the rule	requirement was	not met.		
					8 d	iustmont	¢24.7E0	
					Au	justment	\$24,750	
							L	\$250
Violatio	on Event	S						
		Number of \	/iolation Events	4	122	Number of violation	days	
			daily weekly monthly					
			quarterly semiannual annual single event	X		Violation Bas	se Penalty	\$1,000
			Four single eve	ents are recomm	ended, one for ea	ich late DMR.		
Good F	aith Effo	rts to Com	ply	25.0%			Reduction	\$250
			Befor	e NOE/NOV NOE/N	IOV to EDPRP/Settlen	nent Offer		
			Extraordinary			4		
			Ordinary	Х				
			N/A				1	
			Notes		ndent achieved co eptember 21, 202			
						Violatio	1 Subtotal	\$750
Econon	nic Bene	fit (EB) for	this violation			Statutory Limi	t Test	
		Estimate	ed EB Amount		\$4	Violation Final Pen	alty Total	\$990
				This violetie	Einal Access 1	Donaline (addition to the	for limit-1	4000
				inis violation	rınaı Assessed	Penalty (adjusted	or iimits)	\$990

	E	conomic	Benefit	Wo	rksheet						
	•	n (PCW No. 2 of 2	2)								
Case ID No.											
eg. Ent. Reference No.	RN101920288										
Media Violation No.	Water Quality 1					Percent Interest	Years of Depreciation				
						5.0	15				
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount				
Item Description		·									
2002 2000											
Delayed Costs											
Equipment				0.00	\$0	\$0	\$0				
Buildings				0.00	\$0	\$0	\$0				
Other (as needed)				0.00	\$0	\$0	\$0				
Engineering/Construction				0.00	\$0	\$0	\$0				
Land				0.00	\$0	n/a	\$0				
Record Keeping System				0.00	\$0	n/a	\$0				
Training/Sampling				0.00	\$0	n/a	\$0				
Remediation/Disposal				0.00	\$0	n/a	\$0				
Permit Costs				0.00	\$0	n/a	\$0				
Other (as needed)	\$100	20-Dec-2020	21-Sep-2021	0.75	\$4	n/a	\$4				
Notes for DELAYED costs			te, and the Final		ort). The Date Rec s the date of comp	quired is the first mi liance.	ssed DMR due				
Avoided Costs	Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)										
Atolaca costs	ANNU	LIZE avoided c	osts before en			,					
Disposal	ANNU	LIZE avoided c	osts before en	0.00	\$0	\$0	\$0				
Disposal Personnel	ANNU	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	ANNU	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				
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU	ALIZE avoided c	osts before en	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				
Disposal Personnel Ispection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	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				
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU	ALIZE avoided c	osts before en	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				
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	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				

	30-Nov-2021			ket No. 2020-1533-MWD-E		PCW
Respondent	City of Junction	(PCW No. 2 of	2)		Policy Re	evision 5 (January 28, 2021)
Case ID No.	60115				PCW	Revision February 11, 2021
Reg. Ent. Reference No.	RN101920288					
Media	Water Quality					
Enf. Coordinator	Harley Hobson					
Violation Number	2					
Rule Cite(s)	20 Tau Admain	C-4- 55 205	125(1)	(11)(D) 210 7(-) 4 TDDE	C Dawesit	
	30 Tex. Admin			(11)(B) and 319.7(a) and TPDES er Requirements No. 4	5 Permit	
		No. WQ0010	7199001, Oth	lei Requirements No. 4		
Violation Description	Failed to mainta	ain monitoring	and reporting	g records at the Facility. Specifi	cally, the	
Violation Description	influent fl	ow records of t	flow measure	ments were not being maintain	ed.	
				Base	Penalty	\$25,000
>> Environmental Drope	what sound blacks	an Uaalth A	date:			
>> Environmental, Prope	rty and Huma	an ne aith r Harm	латгіх			
Release	Major	Moderate	Minor			
OR Actual		11000100	111101			
Potential				Percent 0.0%		
>>Programmatic Matrix						
Falsification	Major	Moderate	Minor			
			Х	Percent 1.0%		
						
Matrix						
Matrix Notes	Less that	n 30% of the r	ule requirem	ents were not met.		
Notes						
				Adjustment	\$24,750	
					Г	\$250
					L	\$230
Violation Events						
	_		_			
Number of '	Violation Events	1		62 Number of violation of	days	
	daily					
	weekly					
	monthly				-	
	quarterly			Violation Base	Penalty	\$250
	semiannual					
	annual					
	single event	Х				
		One single ev	vent is recom	mended		
		one single ev	rent is recom	mended.		
					Reduction	\$0
Good Faith Efforts to Com	ply	0.0%			Reduction	
Good Faith Efforts to Com	Be		IOE/NOV to EDP	PRP/Settlement Offer	Reduction	
Good Faith Efforts to Com			NOE/NOV to EDP		Reduction [
Good Faith Efforts to Com	Be		NOE/NOV to EDP		Reduction [
Good Faith Efforts to Com	Be Extraordinary		NOE/NOV to EDF		Reduction	
Good Faith Efforts to Com	Extraordinary Ordinary N/A	efore NOE/NOV N		PR/Settlement Offer	Reduction	
Good Faith Efforts to Com	Extraordinary Ordinary N/A	efore NOE/NOV N	nt does not m	RP/Settlement Offer	Reduction	
Good Faith Efforts to Com	Extraordinary Ordinary N/A	efore NOE/NOV N	nt does not m	PR/Settlement Offer	Reduction [
Good Faith Efforts to Com	Extraordinary Ordinary N/A	efore NOE/NOV N	nt does not m	neet the good faith criteria for iolation.		
Good Faith Efforts to Com	Extraordinary Ordinary N/A	efore NOE/NOV N	nt does not m	RP/Settlement Offer		\$250
	Extraordinary Cordinary N/A Notes	x X The Responder	nt does not m	neet the good faith criteria for iolation.	Subtotal [\$250
Good Faith Efforts to Com Economic Benefit (EB) for	Extraordinary Cordinary N/A Notes	x X The Responder	nt does not m	neet the good faith criteria for iolation.	Subtotal [\$250
Economic Benefit (EB) for	Extraordinary Cordinary N/A Notes	x X The Responder	nt does not m	neet the good faith criteria for iolation.	Subtotal [\$250 \$310
Economic Benefit (EB) for	Extraordinary Ordinary N/A Notes	x X The Responder	nt does not m this v	neet the good faith criteria for iolation. Violation Statutory Limit	Subtotal [Test Ilty Total [

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Junctio	n (PCW No. 2 of 2	2)				
Case ID No.	60115						
Reg. Ent. Reference No.							
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
Violation No.	2						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$150	29-Sep-2021	30-Apr-2025	3.59	\$27	n/a	\$27
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	the influen	t flow, effluent flo accordance with p	w, dissolved oxy ermit requireme	gen, a ents. Th	nd dissolved oxyge	duct employee trainen meter calibration state investigation stance.	records are
Avoided Costs	ANNUA	LIZE avoided c	osts before en	terina	item (except for	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		\$150			TOTAL		\$27

		ening Date				ocket No.	2020-1533-MWD-E			PCW
			City of Junction	(PCW No. 2	of 2)			Policy R	evision 5 (Ja	nuary 28, 2021)
_		ase ID No.						PCW	Revision Fe	bruary 11, 2021
Reg.	Ent. Ref		RN101920288							
	F., £ C		Water Quality							
		tion Number	Harley Hobson							
	viola	Rule Cite(s)								
		Rule Cite(s)					d 319.7(a) and TPDE			
			No. WQI	0010199001,	, Monitoring a	and Reporting	Requirements No. 3	5.D		
			Falled by module				halo Fraille Consil	7 II		
	Violation	Description					t the Facility. Specif en meter calibration			
	Violation	Description	uissoiveu oxy			ng maintaine		records		
						5				
		'					D		•	+2F 000
							Bas	e Penalty		\$25,000
>> Env	vironmer	ntal, Prope	rty and Hum		Matrix					
		Release	Major	Harm Moderate	Minor					
OR		Actual	a.jo.		111101	1				
		Potential					Percent 0.0%			
						=				
>>Pro	gramma	tic Matrix	Major	Madarata	Minor					
		Falsification	Major x	Moderate	Minor	1	Percent 10.0%			
	L L		^			<u> </u>	10.070			
	Matrix Notes		10	0% of the ru	le requireme	nt was not m	et.			
	Notes									
						A .d.:	ustment	\$22,500		
						Auj	ustillelit	\$22,300		
										\$2,500
Violati	on Event	e								
Violati	OII LVEIIC	.5								
		Number of \	/iolation Events	1		62	Number of violation	days		
					ਜ					
			daily		4					
			weekly monthly		-					
			quarterly	Х	-		Violation Bas	e Penalty		\$2,500
			semiannual							, ,
			annual							
			single event							
		One quarte	rly event is reco				21 investigation date	e to the		
				November 3	30, 2021 scre	eening date.				
Cood	aith Effa	rts to Com	mby	0.0%				Dad. akian		\$0
Good F	aitii Eiit	its to com		efore NOE/NOV		DPRP/Settlemer		Reduction		φ0
			Extraordinary		,	,				
			Ordinary							
			N/A	Х						
				The Respond	dent does not	t meet the an	ood faith criteria for			
			Notes	The Respond		s violation.	od faltif criteria for			
							Violation	Subtotal		\$2,500
Fconor	mic Rene	fit (FR) for	this violation	\n			Statutory Limit	· Tact		
200101	c Delle		_	/··		_	_			
		Estimate	ed EB Amount		\$0	V	iolation Final Pena	alty Total		\$3,100
				This vio	lation Final	Assessed P	enalty (adjusted f	or limits)		\$3,100
							-			

Economic Benefit Worksheet												
Respondent	City of Junctio	n (PCW No. 2 of 2)									
Case ID No.	60115											
Reg. Ent. Reference No.	RN101920288	}										
	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		2400 1104411104				55555 54.154						
Item Description												
Delayed Costs	Delayed Costs											
Equipment				0.00	\$0	\$0	\$0					
Buildings				0.00	\$0	\$0	\$0					
Other (as needed)				0.00	\$0	\$0	\$0					
Engineering/Construction				0.00	\$0	\$0	\$0					
Land				0.00	\$0	n/a	\$0					
Record Keeping System				0.00	\$0	n/a	\$0					
Training/Sampling				0.00	\$0	n/a	\$0					
Remediation/Disposal				0.00	\$0	n/a	\$0					
Permit Costs				0.00	\$0	n/a	\$0					
Other (as needed)				0.00	\$0	n/a	\$0					
Notes for DELAYED costs					d in the Economic							
Avoided Costs	ANNUA	ALIZE avoided co	osts before er			one-time avoide						
Disposal				0.00	\$0	\$0	\$0					
Personnel				0.00	\$0	\$0	\$0					
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0					
Supplies/Equipment				0.00	\$0	\$0	\$0					
Financial Assurance				0.00	\$0	\$0	\$0					
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0					
Other (as needed)				0.00	\$0	\$0	\$0					
Notes for AVOIDED costs												
Approx. Cost of Compliance		\$0			TOTAL		\$0					

Scre	ening Date	30-Nov-2021		Docket	No. 2020-1533-MWD-E		PCW
			(PCW No. 2 of 2)			Policy Revis	ion 5 (January 28, 2021)
	ase ID No.					PCW Re	vision February 11, 2021
Reg. Ent. Ref							
		Water Quality					
		Harley Hobson					
Viola	ition Number	4					
	Rule Cite(s)		30 Tex. Admin. Cod	de §§ 217.28	32 and 217.7(b)(2)		
					(// /		
Violatio	n Description			pecifically, p	al disinfection not discusse ool chlorine tablets were b rior approval.		
					Base	e Penalty	\$25,000
>> Environme	ntal, Prope	rty and Hum	an Health Matri	x			
	Dalaas	Moise	Harm Madarata Mina				
OR	Release Actual		Moderate Mind	or			
OK .	Potential		X		Percent 3.0%		
	roteritia				3.0 70		
>>Programma	tic Matrix						
Ĭ.	Falsification	Major	Moderate Mind	or			
					Percent 0.0%		
				*			
Matrix Notes			that are protective of	human hea	insignificant amounts of p lth or environmental recep		
			result of the	violation.			
					Adjustment	\$24,250	
					Aujustillelit	\$24,230	
							\$750
Violation Event	ts						
	Number of \	/iolation Events	1	62	Number of violation	dave	
	Number of V	violation Events	1	02	ivalliber of violation	adys	
		daily					
		weekly					
		monthly					
		quarterly	Х		Violation Base	Penalty	\$750
		semiannual					
		annual					
		single event					
	One quarte	rly event is reco	•	•	29, 2021 investigation date	to the	
			November 30, 2021	. screening o	late.		
		_					
Good Faith Effo	orts to Com		0.0%			Reduction	\$0
		T-	efore NOE/NOV NOE/NO	V to EDPRP/Se	ttlement Offer		
		Extraordinary					
		Ordinary					
		N/A	Х				
		Notes	The Respondent doe		the good faith criteria for		
		Notes		this violation	on.		
		L					
					Violation	Subtotal	\$750
Economic Bene	efit (EB) for	this violation	n		Statutory Limit	Test	
	Estime t	ed EB Amount	#1	,255	Violation Final Pena	ilty Tatal	\$930
	Estimate	eu ED AMOUNT	\$1	,233	VIDIATION FINAL PENA	iity iotai	υςεφ
			This violation I	inal Asses	sed Penalty (adjusted f	or limits)	\$930

	E	conomic	Benefit	Wo	rksheet		
	•	n (PCW No. 2 of 2	2)				
Case ID No.							
eg. Ent. Reference No.							
Media Violation No.	Water Quality 4					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
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$5,000	29-Sep-2021	30-Apr-2025	3.59	\$60	\$1,195	\$1,255
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	Requi	ired is the investig	gation date, and	I the Fir	nal Date is the esti	on system at the Fa mated date of comp	liance.
1110100000	ANNUA	ALIZE avoided C	osts before er	0.00	\$0		
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
nspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$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		\$5,000			TOTAL		\$1,255

Respondent Case ID No. Reg. Ent. Reference No.				No. 2020-1533-MWD-E	PCW
	City of Junction (F	PCW No. 2 of	2)	Poli	ry Revision 5 (January 28, 2021)
Rea Ent Reference No.	60115				PCW Revision February 11, 2021
Media	Water Quality				
Enf. Coordinator	Harley Hobson				
Violation Number	5				
Rule Cite(s)	30 Tex. Admin.	Code § 305.	125(1) and TPDES	Permit No. WQ0010199001, Othe	r
	50 Text Admin	code 3 505	Requirements N		
			<u> </u>		
				sed Professional Engineer that the	
Violation Description		-		teria prior to utilization. Specifical	<mark>y,</mark>
	the Responde	ent failed to	provide certification	ns for all three oxidation ponds.	
'					
				Base Penal	\$25,000
>> Environmental, Proper	rty and Huma		Matrix		
Release	Major	Harm Moderate	Minor		
OR Actual		Moderate	Minor		
Potential				Percent 0.0%	
roteitiai				761 Cent 0.0%	
>>Programmatic Matrix					
Falsification	Major	Moderate	Minor		
	X			Percent 10.0%	
Matrix	1009	% of the rule	requirement was	not met.	
Notes			,		
				Adjustment \$22,5	00
				-	
					\$2,500
Mining Program					
Violation Events					
Number of \	/iolation Events	3	6	Number of violation days	
Number of \	/iolation Events	3	6.	Number of violation days	
Number of \		3	6.	Number of violation days	
Number of \	daily	3	6.	Number of violation days	
Number of \	daily weekly		6.	Number of violation days	
Number of \	daily weekly monthly	3 x	6		ty \$7,500
Number of \	daily weekly		6.	Number of violation days Violation Base Penal	ty \$7,500
Number of \	daily weekly monthly quarterly		6.		ty \$7,500
Number of \	daily weekly monthly quarterly semiannual		6.		ty \$7,500
Number of \	daily weekly monthly quarterly semiannual annual		6.		ty \$7,500
	daily weekly monthly quarterly semiannual annual single event	X		Violation Base Penal	
	daily weekly monthly quarterly semiannual annual single event	x x	om the Septembe	Violation Base Penal 29, 2021 investigation date to the	
	daily weekly monthly quarterly semiannual annual single event	x x		Violation Base Penal 29, 2021 investigation date to the	
Three months	daily weekly monthly quarterly semiannual annual single event	x x mmended, fr	om the Septembe	Violation Base Penal - 29, 2021 investigation date to the date.	е
	daily weekly monthly quarterly semiannual annual single event	x mmended, fr November 30	om the Septembe	Violation Base Penal 29, 2021 investigation date to the date. Reduction	е
Three months	daily weekly monthly quarterly semiannual annual single event	x mmended, fr November 30	om the Septembe	Violation Base Penal 29, 2021 investigation date to the date. Reduction	е
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary	x mmended, fr November 30	om the Septembe	Violation Base Penal 29, 2021 investigation date to the date. Reduction	е
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary	x x mmended, fr November 30 0.0% ore NOE/NOV	om the Septembe	Violation Base Penal 29, 2021 investigation date to the date. Reduction	е
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary	x mmended, fr November 30	om the Septembe	Violation Base Penal 29, 2021 investigation date to the date. Reduction	е
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A	x mmended, fr November 30 0.0% Dre NOE/NOV	om the Septembe 1, 2021 screening 1	Violation Base Penal 29, 2021 investigation date to the date. Reduction titlement Offer	е
Three months	daily weekly monthly quarterly semiannual annual single event y events are recore ply Extraordinary Ordinary N/A	x mmended, fr November 30 0.0% Dre NOE/NOV	om the Septembe 1, 2021 screening 1	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for	е
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A	x mmended, fr November 30 0.0% Dre NOE/NOV	om the Septembe 1, 2021 screening 1NOE/NOV to EDPRP/Se	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for	е
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A	x mmended, fr November 30 0.0% Dre NOE/NOV	om the Septembe 1, 2021 screening 1NOE/NOV to EDPRP/Se	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for on.	e on \$0
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A	x mmended, fr November 30 0.0% Dre NOE/NOV	om the Septembe 1, 2021 screening 1NOE/NOV to EDPRP/Se	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for	e on \$0
Good Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A Notes TI	x x mmended, fr November 30 0.0% ore NOE/NOV x he Responde	om the Septembe 1, 2021 screening 1NOE/NOV to EDPRP/Se	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for on. Violation Subtol	e on \$0
Three months	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A Notes TI	x x mmended, fr November 30 0.0% ore NOE/NOV x he Responde	om the Septembe 1, 2021 screening NOE/NOV to EDPRP/Se	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for on. Violation Subton Statutory Limit Test	e \$0 \$0
Good Faith Efforts to Com Economic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A Notes TI	x x mmended, fr November 30 0.0% ore NOE/NOV x he Responde	om the Septembe 1, 2021 screening 1NOE/NOV to EDPRP/Se	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for on. Violation Subtol	e \$0 \$0
Good Faith Efforts to Com Economic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event y events are recor ply Extraordinary Ordinary N/A Notes This violation	x mmended, fr November 30 0.0% ore NOE/NOV x he Responde	om the Septembe 1, 2021 screening NOE/NOV to EDPRP/Se nt does not meet this violati \$1,255	Violation Base Penal 29, 2021 investigation date to the date. Reduction the good faith criteria for on. Violation Subton Statutory Limit Test	al \$7,500

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Junctio	n (PCW No. 2 of 2	2)				
Case ID No.	60115						
Reg. Ent. Reference No.	RN101920288	}					
	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
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$5,000	29-Sep-2021	30-Apr-2025	3.59	\$60	\$1,195	\$1,255
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	Professional E	Engineer in order t investigation da	to meet the requience ate, and the Fin	uiremer al Date	nts of the liner cert is the estimated d	'	Required is the
Avoided Costs	ANNU	ALIZE avoided c	osts before er			one-time avoide	
Disposal				0.00	\$0 \$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0 \$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				0.00	1 40	Ψ0	40
Approx. Cost of Compliance		\$5,000			TOTAL		\$1,255

		ening Date				et No. 2020-1533-MWD-E		PCW
	F	Respondent	City of Junction	(PCW No. 2 o	of 2)		Policy Re	evision 5 (January 28, 2021)
		Case ID No.					PCW	Revision February 11, 2021
Reg.	Ent. Ref	ference No.	RN101920288					
		Media	Water Quality					
	Enf. (Coordinator	Harley Hobson	_				
	Viol	ation Number	6					
		Rule Cite(s)		30 T	ex. Admin. Cod	e 8 317.3(e)(5)		
			Failed to provid	la tha raquira	d alarm cyctom	Specifically, the lift station a	diacent to	
	Violatio	n Description				rational audio-visual alarm.	iajacent to	
						Bas	e Penalty	\$25,000
>> Fnv	/ironme	ntal. Prope	rty and Hum	an Health	Matrix			
, , <u>-</u>		intal, i rope	icy and man	Harm	riacin			
		Release	Major	Moderate	Minor			
OR		Actual						
		Potential		X		Percent 5.0%		
_								
>>Prog	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor	-		
						Percent 0.0%		
	Matrix					to significant amounts of pollu		
	Notes	would not exc	eed levels that a		of human healtl f the violation.	n or environmental receptors	as a result	
				Ü	the violation.			
						Adinatusant	\$23,750	
						Adjustment	\$23,750	
							Γ	\$1,250
Violatio	on Even	ts						
		Ni. mahamati	/ialatian Frants	4	ı —	C2 Number of violeties	d=	
		number of v	/iolation Events	1		Number of violation	days	
			daily		Ī			
			weekly					
			monthly					
			quarterly	х		Violation Bas	e Penalty	\$1,250
			semiannual				- 1	. ,
			annual					
			single event					
					•			
		One quarte	rlv event is reco	mmended, fro	om the Septemb	er 29, 2021 investigation dat	e to the	
			,		30, 2021 screeni			
Good F	aith Eff	orts to Com	ply	0.0%			Reduction	\$0
					NOE/NOV to EDPR	P/Settlement Offer		
			Extraordinary					
			Ordinary					
			N/A	X			•	
				The Personal	lant door not me	eet the good faith criteria for		
			Notes	The Respond	this vio	_		
					CIIIS VIC			
							. Carlot a a a T	±4 0F0
						Violation	Subtotal	\$1,250
Econon	nic Ben	efit (EB) for	this violation	on		Statutory Limit	t Test	
		Estimate	ed EB Amount		\$63	Violation Final Pen	alty Total	\$1,550
				This vio	lation Final As	sessed Penalty (adjusted f	or limits)	\$1,550

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Junctio	n (PCW No. 2 of 2	!)				
Case ID No.	60115						
Reg. Ent. Reference No.	RN101920288						
	Water Quality					Percent Interest	Years of Depreciation
Violation No.	O .					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs							
Equipment	\$250	29-Sep-2021	30-Apr-2025	3.59	\$3	\$60	\$63
Buildings	<u> </u>	23 000 2021	50 7.p. 2025	0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs		investigation da	ate, and the Fin	al Date	is the estimated d	·	
Avoided Costs	ANNUA	ALIZE avoided C	osts before en			one-time avoide	•
Disposal				0.00	\$0	\$0	\$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$0 \$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		1		0.00	1 40	ΨΟ Ι	<u> </u>
Approx. Cost of Compliance		\$250			TOTAL		\$63

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



Compliance History Report

Compliance History Report for CN600253058, RN101920288, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, CN600253058, City of Junction Classification: SATISFACTORY Rating: 2.30

or Owner/Operator:

Regulated Entity: RN101920288, CITY OF JUNCTION Classification: SATISFACTORY Rating: 4.28

Complexity Points: 7 Repeat Violator: NO

CH Group: 08 - Sewage Treatment Facilities

Location: North of and adjacent to Farm-to-Market Road 2169, approximately 0.4 mile northeast of the intersection of

Farm-to-Market Road 2169 and Interstate Highway 10, Junction, Kimble County, Texas

TCEO Region: REGION 08 - SAN ANGELO

ID Number(s):

WASTEWATER PERMIT WQ0010199001 WASTEWATER EPA ID TX0021075

Compliance History Period: September 01, 2019 to August 31, 2024 Rating Year: 2024 Rating Date: 09/01/2024

Date Compliance History Report Prepared: November 15, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: November 15, 2019 to November 15, 2024

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

Name: Harley Hobson Phone: (512) 239-1337

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?

2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

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

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

Effective Date: 09/16/2020 ADMINORDER 2020-0102-MWD-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)

30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: Effluent Limits PERMIT

Description: During a record review conducted on November 25, 2019, an investigator documented that the Respondent failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE §305.125(1), TEX. WATER CODE §26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010199001, Effluent Limitations and Monitoring Requirements No. 1, as shown in the effluent violation table

below

B. Criminal convictions:

N/A

1

C. Chronic excessive emissions events:

N/A

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

Item 1	April 28, 2020	(1637266)	Item 10	August 14, 2023	(1933133)
Item 2	June 20, 2020	(1666703)	Item 11	October 17, 2023	(1946121)
Item 3	July 23, 2020	(1673661)	Item 12	November 20, 2023	(1951812)
Item 4	September 20, 2020	(1687004)	Item 13	December 18, 2023	(1961576)
Item 5	October 20, 2020	(1693351)	Item 14	January 25, 2024	(1968170)
Item 6	November 20, 2020	(1712743)	Item 15	February 13, 2024	(1977232)
Item 7	December 22, 2020	(1712744)	Item 16	March 18, 2024	(1983799)
Item 8	April 22, 2021	(1704200)	Item 17	May 16, 2024	(1996785)
Item 9	December 20, 2021	(1775880)	Item 18	June 11, 2024	(2003737)

Item 19 July 11, 2024 (2011291) Item 21 September 17, 2024 (2023912)

Item 20 August 19, 2024 (2016893)

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

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

1 Date: 03/31/2024 (1990328)

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: 06/14/2024 (1988184)

Self Report? NO Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)

Description: Failure to prevent an unauthorized discharge into or adjacent to waters of the

State.

Self Report? NO Classification: Moderate

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

30 TAC Chapter 305, SubChapter F 305.125(5)

WQ0010199001 PERMIT

Description: Failure to maintain the collection system.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(9)

WQ0010199001 PERMIT

Description: Failure to provide notification of any noncompliance which may endanger

human health or safety, or the environment.

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING CITY OF JUNCTION RN101920288

§ §

TEXAS COMMISSION ON

§

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2020-1533-MWD-E

I. JURISDICTION AND STIPULATIONS

On, i	the Texas Commission on Environmental Quality ("the
Commission" or "TCEQ") consider	red this agreement of the parties, resolving an enforcement
action regarding the City of Junc	tion (the "Respondent") under the authority of Tex. Water Code
chs. 7 and 26. The Executive Dire	ector of the TCEQ, through the Enforcement Division, and the
Respondent together stipulate th	nat:
chs. 7 and 26. The Executive Dire	ector of the TCEQ, through the Enforcement Division, and the

- 1. The Respondent owns and operates a wastewater treatment facility located north of and adjacent to Farm-to-Market Road 2169, approximately 0.4 mile northeast of the intersection of Farm-to-Market Road 2169 and Interstate Highway 10, Junction, Kimble 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 \$38,868 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$31,095 of the penalty and \$7,773 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
- 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. By October 30, 2020:
 - i. Updated procedures and conducted employee training to ensure adequate quality control measures are implemented, including but not limited to calibrating the dissolved oxygen meter prior to use; and
 - ii. Began retaining all supporting documents for discharge monitoring reports ("DMRs"); and
 - iii. Began recording pH calibration measures.
 - b. By November 6, 2020, began maintaining daily operational logs, maintenance logs, and procedural logs;
 - c. By January 27, 2021, renewed the chief operator's occupational license; and
 - d. By September 21, 2021, submitted the DMRs for the monthly monitoring periods of November 2020 and January, April, and August 2021.

II. ALLEGATIONS

- 1. During an investigation conducted on September 22, 2020, an investigator documented that the Respondent:
 - a. Failed to ensure all operators at the Facility have the required occupational license, in violation of 30 Tex. Admin. Code §§ 30.350(d) and 305.125(1) and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0010199001, Other Requirements No. 1. Specifically, the chief operator was operating with a license that expired on April 25, 2020.
 - b. Failed to comply with recommended sampling and testing methods, in violation of 30 Tex. Admin. Code §§ 305.125(1) and 319.11 and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 2.a. Specifically, the dissolved oxygen meter was not being calibrated prior to use.

- c. Failed to maintain monitoring and reporting records at the Facility, in violation of 30 Tex. Admin. Code §§ 305.125(1), (11)(C), and 319.7(a), and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.b and Operational Requirements No. 1. Specifically, pH meter calibration records, daily operational logs, maintenance logs, and procedural logs were not being maintained.
- d. Failed to properly dispose of bar screenings resulting in a discharge of municipal waste, in violation of 30 Tex. ADMIN. CODE §§ 305.125(1) and 317.4(b)(4), Tex. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0010199001, Permit Conditions No. 2.g. Specifically, there was a lack of tight-fitting covers to reduce vector access to screenings stored in the containers and screenings on the ground in the surrounding area.
- e. Failed to maintain monitoring and reporting records at the Facility, in violation of 30 Tex. Admin. Code §§ 305.125(1) and (11)(C) and 319.7(a) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.c. Specifically,the identity of who was conducting flow measurements was not being recorded.
- f. Failed to ensure the Facility and all of its systems of collection, treatment, and disposal were properly operated and maintained, in violation of 30 Tex. Admin. Code § 305.125(1) and (5) and TPDES Permit No. WQ0010199001, Other Requirements No. 3. Specifically, trees were growing on the inside of the embankments of Pond Nos. 1 and 5, which could allow seepage of partially treated wastewater through the liner.
- g. Failed to maintain monitoring and reporting records at the Facility, in violation of 30 Tex. Admin. Code §§ 305.125(1) and (11)(C) and 319.7(a) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.b. Specifically, supporting documents for DMRs such as lab reports and chain of custodies were not retained.
- 2. During an investigation conducted from September 29, 2021 through September 30, 2021, an investigator documented that the Respondent:
 - a. Failed to timely submit monitoring results at intervals specified in the permit, in violation of 30 Tex. Admin. Code §§ 305.125(1) and (17) and 319.7(d) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 1. Specifically, the DMRs for the monthly monitoring periods of November 2020 and January, April, and August 2021 were not submitted by the 20th day of the following month.
 - b. Failed to maintain monitoring and reporting records at the Facility, in violation of 30 Tex. Admin. Code §§ 305.125(1) and (11)(B) and 319.7(a) and TPDES Permit No. WQ0010199001, Other Requirements No. 4. Specifically, the influent flow records of flow measurements were not being maintained.
 - c. Failed to maintain monitoring and reporting records at the Facility, in violation of 30 Tex. Admin. Code §§ 305.125(1) and (11)(B) and 319.7(a) and TPDES Permit No. WQ0010199001, Monitoring and Reporting Requirements No. 3.b.

- Specifically, the dissolved oxygen, effluent flow, and dissolved oxygen meter calibration records were not being maintained.
- d. Failed to obtain approval to utilize any chemical disinfection not discussed in 30 Texas Admin. Code ch. 217, in violation of 30 Tex. Admin. Code §§ 217.282 and 217.7(b)(2). Specifically, pool chlorine tablets were being used for disinfection without prior approval.
- e. Failed to provide certification by a Texas Licensed Professional Engineer that the completed pond lining meets the appropriate criteria prior to utilization, in violation of 30 Tex. Admin. Code § 305.125(1) and TPDES Permit No. WQ0010199001, Other Requirements No. 3. Specifically, the Respondent failed to provide certifications for all three oxidation ponds.
- f. Failed to provide the required alarm system, in violation of 30 Tex. Admin. Code § 317.3(e)(5). Specifically, the lift station adjacent to the Facility did not have an operational audio-visual alarm.

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 Junction, Docket No. 2020-1533-MWD-E" to:

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

- 2. The Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Develop and implement procedures to ensure:
 - Records are maintained in accordance with permit requirements, including but not limited to influent and effluent flow records, dissolved oxygen and dissolved oxygen calibration records, and the identity of the individual taking samples and measurements;

- Bar screenings are properly disposed of in a covered container; and
- 3. Proper maintenance of vegetation around the retention ponds.
- ii. Clean up the screenings on the ground in the surrounding area, in accordance with 30 Tex. Admin. Code § 317.4, Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0010199001, Permit Conditions No. 2.g;
- iii. Remove trees and large vegetation from the embankments of Pond Nos. 1 and 5, in accordance with TPDES Permit No. WQ0010199001, Other Requirements No. 3;
- iv. Install an approved disinfection system at the Facility, in accordance with 30 Tex. Admin. Code §§ 217.282 and 217.7;
- v. Conduct an evaluation of the Facility by a Texas Licensed Professional Engineer in order to meet the requirements of the liner certification for the three oxidation ponds, in accordance with TPDES Permit No. WQ0010199001, Other Requirements No. 3; and
- vi. Repair/replace the lift station audio-visual alarm adjacent to the Facility, in accordance with 30 Tex. ADMIN. CODE § 317.3.
- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.d below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.i through 2.a.vi.
- c. Within 180 days after the effective date of this Order, have the liners of Pond Nos. 1 and 5 re-certified by a Texas Licensed Professional Engineer, in accordance with TPDES Permit No. WQ0010199001, Other Requirements No. 3.
- d. Within 195 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.c. 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:

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

with a copy to:

Water Section Manager San Angelo Regional Office Texas Commission on Environmental Quality 622 South Oakes, Suite K San Angelo, Texas 76903-7035

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 5. 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 Enforcement Section at the address listed above.
- 6. 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.
- 7. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under Tex. Bus. Org. Code § 1.002.

City of Junction DOCKET NO. 2020-1533-MWD-E Page 7

8. 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 Junction DOCKET NO. 2020-1533-MWD-E Page 8

City of Junction

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL OUALITY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY					
For the Commission	Date				
	5/9/2025				
For the Executive Director	Date				
I, the undersigned, have read and understand the attached order, and I do agree to the terms and coacknowledge that the TCEQ, in accepting payment for on such representation.	nditions specified therein. I further				
I also understand that failure to comply with the Order and/or failure to timely pay the penalty amount, may it					
 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 docum	ents may result in criminal prosecution.				
Must Kammon 8	12/16/24				
Signature	Date				
Wm R Hammonds Name (Printed or typed)	Mayor Title				
Authorized Representative of					

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