Order Type: Default Order

Media: LII

Small Business: Yes

Location(s) Where Violation(s) Occurred:
10801 Belton Avenue, Lubbock, Lubbock County (the "Business")
3520 41st Street, Lubbock, Lubbock County (the "Site")

Type of Operation:

a landscape irrigation business

Other Significant Matters: Additional Pending Enforcement Actions:	None
Past-Due Penalties:	None
Past-Due Fees:	None
Other:	None
Interested Third Parties:	None
Texas Register Publication Date:	June 14, 2024
Comments Received:	None
Pen	alty Information
Total Penalty Assessed:	\$3,525
Total Paid to General Revenue:	\$0
Total Due to General Revenue:	\$3,525
Compliance History Classifications: Person/CN - Not Applicable Site/RN - Not Applicable	
Major Source:	No
Statutory Limit Adjustment:	None
Applicable Penalty Policy:	April 2014
<u>Invest</u>	igation Information
Complaint Date(s):	September 3, 2020
Complaint Information:	On September 3, 2020, the Tex Environmental Quality (TCEQ) Program received a complaint irrigator refused to remedy an complaints.
Date(s) of Investigation:	September 10, 2020
Date(s) of NOV(s):	N/A

Date(s) of NOE(s):

exas Commission on) Landscape Irrigation it alleging that a licensed iny of the owners'

June 2, 2021

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 60862 Patrick Gordon Snipes RN110821154 Docket No. 2021-0734-LII-E

Violation Information

- 1. Failed to ensure that every document requiring an irrigator's seal has the seal clearly visible and legible on the original document and all copies or reproductions of the original document [30 TEX. ADMIN. CODE §§ 344.42(a) and 344.71(a)].
- 2. Failed to obtain all permits and inspections required to install an irrigation system [30 Tex. ADMIN. CODE § 344.35(d)(2)].
- 3. Failed to include the required TCEQ statement on all written estimates, proposals, bids, and invoices relating to the installation or repair of an irrigation system [30 TEX. ADMIN. CODE § 344.71(a) and (b)].
- 4. Failed to ensure the backflow prevention assembly is tested prior to being placed in service [30 Tex. ADMIN. CODE § 344.52(c)].
- 5. Failed to ensure all irrigation systems are designed, installed, maintained, altered, repaired, serviced, and operated in a manner that will promote water conservation [30 Tex. ADMIN. CODE § 344.60].
- 6. Failed to make available all records of landscape irrigation services within ten business days of any request made by authorized representatives of the Commission or local regulatory authority with jurisdiction over landscape irrigation [30 Tex. ADMIN. CODE § 344.38].
- 7. Failed to adhere to terms of the warranty presented to the irrigation system's owner [30 Tex. ADMIN. CODE § 344.72(a)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed: None

Technical Requirements:

- 1. Within 30 days:
 - a. Implement measures and/or procedures to ensure every document requiring an irrigator's seal has the seal clearly visible and legible on the original document and all copies or reproductions of the original document, including contracts;
 - b. Implement measures and/or procedures to ensure that all permits are obtained prior to installing irrigation systems;
 - c. Implement measures and/or procedures to ensure the required statement "Irrigation in Texas is regulated by the Texas Commission on Environmental Quality (TCEQ), MC-235, P.O. Box 13087, Austin, Texas 78711-3087. TCEQ's website is: www.tceq.texas.gov" is included on all bids and contracts to install an irrigation system;
 - d. Implement measures and/or procedures to ensure backflow prevention devices are tested prior to being placed in service;
 - e. Implement measures and/or procedures to ensure that all irrigation systems are designed, installed, maintained, altered, repaired, serviced, and operated in a manner that will promote water conservation; and
 - f. Implement measures and/or procedures to ensure that all records of landscape irrigation services are made available within ten business days of any request made by authorized representatives of the Commission or local regulatory authority with jurisdiction over landscape irrigation.
- 2. Within 45 days submit written certification to demonstrate compliance with Technical Requirements 1.a. through 1.f.

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 60862 Patrick Gordon Snipes RN110821154 Docket No. 2021-0734-LII-E

Litigation Information

Date Petition(s) Filed:	February 21, 2024
Date(s) of Service:	February 26, 2024
Date Answer(s) Filed:	N/A

Contact Information

TCEQ Attorneys: Cynthia Sirois, Litigation Division, (512) 239-3400 Sheldon Wayne, Public Interest Counsel, (512) 239-6363

TCEQ Litigation Agenda Coordinator: Katherine McKenzie, Litigation Division, (512) 239-2575
TCEQ Enforcement Coordinator: Mistie Gonzales, Enforcement Division, 254-761-3056
TCEQ Regional Contact: Jason Lindeman, Lubbock Regional Office, 806-796-7092
Respondent Contact: Patrick Gordon Snipes, 2211 SE 3rd Street, Boynton Beach, Florida 33435
Respondent's Attorney: N/A

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THE MAKEN TAL CO	Policy R	Pe Revision 4 (April 2014)	nalty Calcu	ulatio	n Worksh	eet (PC	-	Revision Marcl	h 26, 2014
DATES	Assigned								
	PCW	4-Nov-2021	Screening 27-M	lay-2021	EPA Due				
RESPO		TY INFORMATI							1
Rer	Respondent g. Ent. Ref. No.	Patrick Gordon S	nipes						
	ty/Site Region				Major/M	inor Source	Minor		
CASE I	NEODMATION								
	NFORMATION f./Case ID No.	60862			No. o	f Violations	7		1
	Docket No.	2021-0734-LII-E				Order Type	1660		
Med	lia Program(s)	Irrigators			Government,		No Mistie Gonzale		+
	Multi-Media				Enr. v		Enforcement		+
Adn	nin. Penalty \$ I	Limit Minimum	\$0 Max i	imum	\$5,000				
			Penalty C	alculat	tion Sectio	n			
ΤΟΤΑΙ	L BASE PENA	LTY (Sum of	violation base	e penalt	ies)		Subtotal 1		\$1,750
	STMENTS (+	/-) TO SUBTO	ΤΔΙ 1						
	Subtotals 2-7 are of	otained by multiplying	the Total Base Penalty	(Subtotal 1)) by the indicated pe				
	Compliance Hi	story		0.0%	Adjustment	Subto	tals 2, 3, & 7		\$0
	Notes		No adjustment for	r Compliar	nce History.				
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Re	spondent does not	meet the	culpability crite	ria.			
	Good Eaith Eff	ort to Comply T	otal Adjustments	•			Subtotal 5	r	\$0
	Good Faith En		otal Aujustinents	•			Subtotal S	ļ	ΨU
	Economic Ben	ofit		0.0%	Enhancement*		Subtotal 6		\$0
		Total EB Amounts	\$1,885		at the Total EB \$ A	mount	Subtotal		φU
	Estimated	Cost of Compliance	\$3,213						
SUM C	OF SUBTOTA	LS 1-7				F	inal Subtotal		\$1,750
				-				r F	
		AS JUSTICE M Subtotal by the indic	IAY REQUIRE		101.4%		Adjustment		\$1,775
incluces e	Notes		I enhancement to o with Violation N			associated			
						Final Pen	alty Amount		\$3,525
STATU	JTORY LIMI	r adjustmen	IT			Final Asse	ssed Penalty		\$3,525
DEFEF	RRAL				0.0%	Reduction	Adjustment		\$0
		nalty by the indicated	l percentage.				1	L	
	Notes	Defe	rral not offered for	non-expe	dited settlement	t.			
ΡΔΥΔΙ	BLE PENALT	V							\$3,525
IAIA									~J,J2J

Compliance Hist	Compliance History Worksheet		
 Compliance Hist Component 	ory <i>Site</i> Enhancement (Subtotal 2) Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
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 and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
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 (<i>number of counts</i>)	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%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
	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%
Other	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	ototal 2)
Repeat Violator	(Subtotal 3)		
N//	A Adjustment Per	centage (Sub	ototal 3)
Compliance Hist	ory Person Classification (Subtotal 7)		
N//	A Adjustment Per	centage (Sub	ototal 7)
Compliance Hist	ory Summary		
Compliance History Notes	No adjustment for Compliance History.		
	Total Compliance History Adjustment Percentage (Subtotals 2,	3, & 7)
Final Compliance	History Adjustment Final Adjustment Percent	ane *conned	at 100%
		age capped	10070

Screening Date 27-May-2021 Respondent Patrick Gordon Snipes **Case ID No.** 60862 Reg. Ent. Reference No. RN110821154 Media Irrigators

Enf. Coordinator Mistie Gonzales

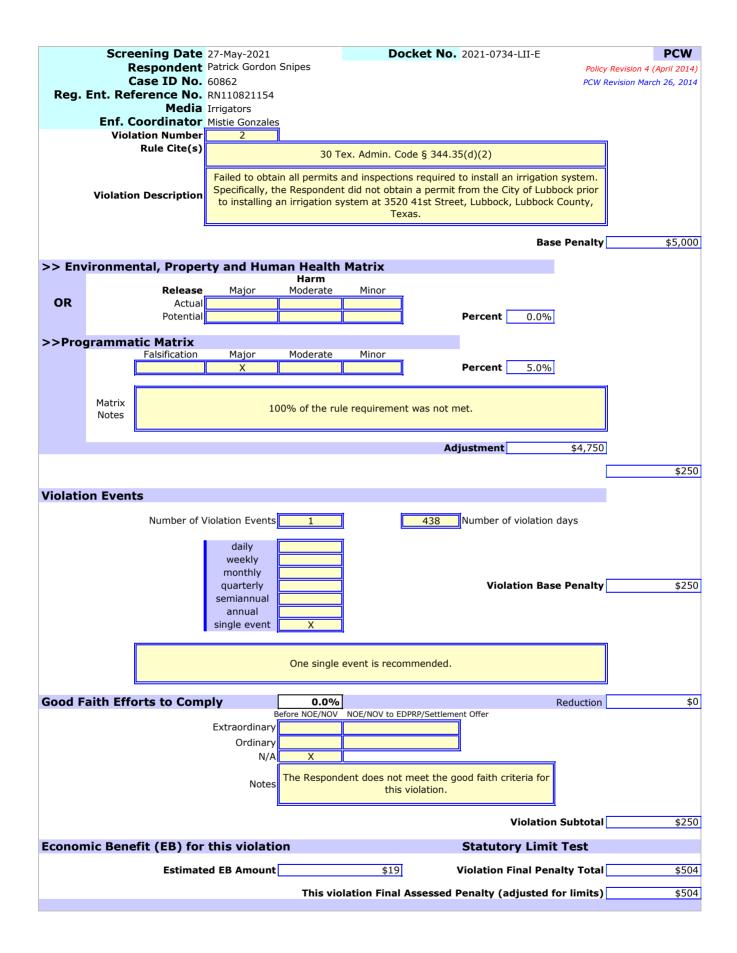
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Policy Revision 4 (April 2014) PCW Revision March 26, 2014

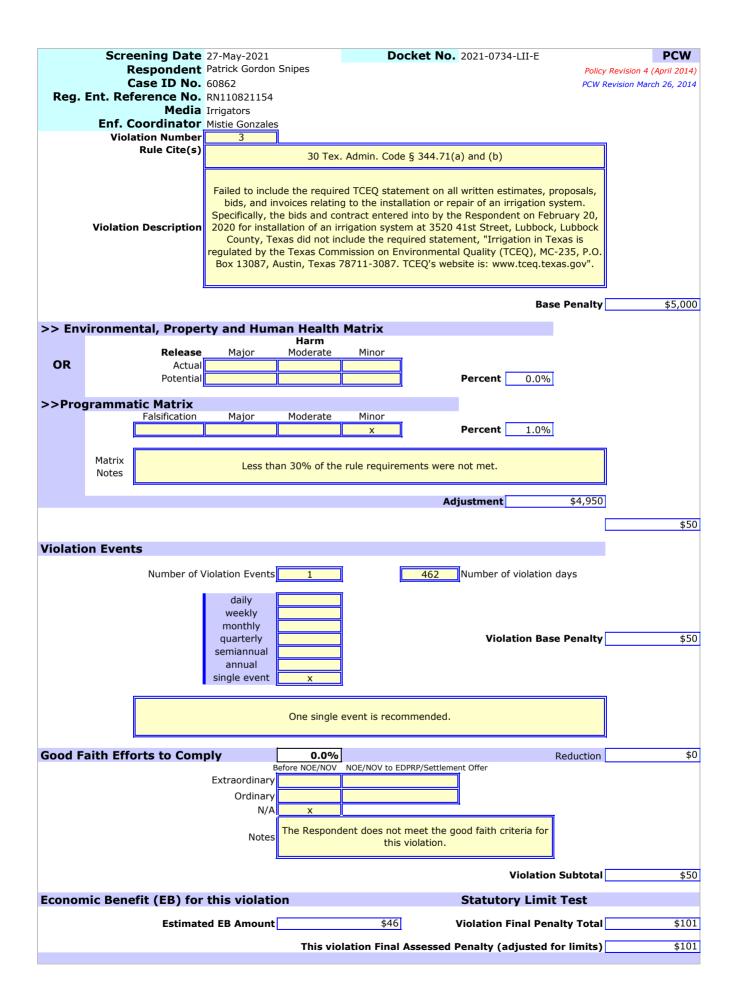
PCW

		ening Date		Docket	No. 2021-0734-LII-E	PCW
			Patrick Gordon Snipes			Policy Revision 4 (April 2014)
Peg		Case ID No.	60862 RN110821154			PCW Revision March 26, 2014
Keg.	LIIL KEI		Irrigators			
	Enf. C		Mistie Gonzales			
	Viola	ation Number	1			
		Rule Cite(s)	30 Tex. Ad	min. Code §§ 344.42	2(a) and 344.71(a)	
	Violatio	n Description	clearly visible and legible o of the original document. S	n the original docum pecifically, the contra	ng an irrigator's seal has the sea lent and all copies or reproduction act to install an irrigation system Texas did not include the irrigat	ons n at
					Base Pen	alty \$5,000
>> Env	vironme	ntal, Proper	r <mark>ty and Human Health</mark> _{Harm}	n Matrix		
		Release	Major Moderate	Minor		
OR		Actual				
		Potential			Percent 0.0%	
>>Pro	aramma	tic Matrix				
	J	Falsification	Major Moderate	Minor		
				X	Percent 1.0%	
	Matrix Notes		Less than 30% of th	e rule requirements	was not met.	
					A diverse and	050
					Adjustment \$4	,950
						\$50
Violati	on Even	ts				
		Number of \	/iolation Events 1	46	2 Number of violation days	
			daily weekly monthly quarterly semiannual annual single event X		Violation Base Pen	alty \$50
			One single	event is recommend	led.	
Good F	aith Effo	orts to Com	ply 0.0%		Reduc	tion \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Se	ettlement Offer	
			Extraordinary Ordinary			
				dent does not meet t this violatio	the good faith criteria for	
					Violation Subt	otal \$50
Feerer			this visit			
ECONOR	nic Bene	III (EB) TOP	this violation		Statutory Limit Tes	•
		Estimate	ed EB Amount	\$46	Violation Final Penalty T	otal \$101
			This vio	lation Final Assess	ed Penalty (adjusted for lim	i ts) \$101

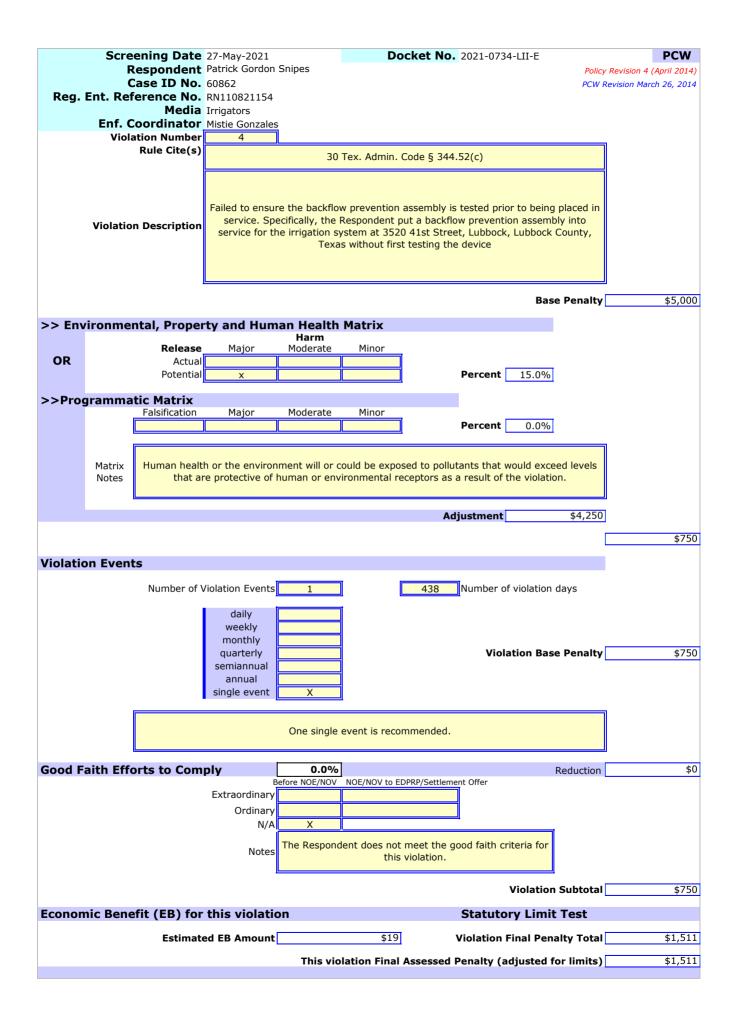
		conomic	Benefit	Wo	rksheet		
Respondent	Patrick Gordor	n Snipes					
Case ID No.	60862						
leg. Ent. Reference No.	RN110821154						
	Irrigators					Percent Interest	Years of Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	L						
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	\$250	10-Sep-2020	29-Mar-2022	1.55	\$19	n/a	\$19
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	+0	,	
i chine costs				0.00	\$0	n/a	\$0
Other (as needed)	Estimated	cost to impleme	ent measures an	0.00	\$0	n/a	\$0
	irrigator's sea	l be clearly visibl	e and legible on contracts. Date i	0.00 d/or pro the orig required	\$0 ocedures to ensure ginal document and		\$0 equiring an ductions of the
Other (as needed)	irrigator's sea original docu	I be clearly visiblument, including	e and legible on contracts. Date i estimate	0.00 d/or pro the orig equired ed date	\$0 ocedures to ensure ginal document and d is the record revi of compliance.	n/a e every document re d all copies or repro	\$0 equiring an ductions of the nal date is the
Other (as needed) Notes for DELAYED costs	irrigator's sea original docu	I be clearly visiblument, including	e and legible on contracts. Date i estimate	0.00 d/or pro the orig equired ed date	\$0 ocedures to ensure ginal document and d is the record revi of compliance.	n/a e every document re d all copies or repro ew date, and the fir	\$0 equiring an ductions of the nal date is the
Other (as needed) Notes for DELAYED costs Avoided Costs	irrigator's sea original docu	I be clearly visiblument, including	e and legible on contracts. Date i estimate	0.00 d/or pro the orig equired d date	\$0 pocedures to ensure ginal document and d is the record revi of compliance. item (except for	n/a e every document re d all copies or repro ew date, and the fir one-time avoide	\$0 equiring an ductions of the hal date is the d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	irrigator's sea original docu	I be clearly visiblument, including	e and legible on contracts. Date i estimate	0.00 d/or pro the orig equired d date tering 0.00 0.00	\$0 predures to ensure ginal document and d is the record revi of compliance. item (except for \$0 \$0 \$0 \$0	n/a e every document re d all copies or repro ew date, and the fir r one-time avoide \$0 \$0 \$0	\$0 equiring an ductions of the nal date is the d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	irrigator's sea original docu	I be clearly visiblument, including	e and legible on contracts. Date i estimate	d/or pro the orig equired d date tering 0.00 0.00	\$0 predures to ensure ginal document and d is the record revi of compliance. item (except for \$0 \$0	n/a e every document re d all copies or repro ew date, and the fir r one-time avoide \$0 \$0	\$0 equiring an ductions of the hal date is the d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	irrigator's sea original docu	ALIZE avoided	e and legible on contracts. Date e estimate costs before en	0.00 d/or pro the orig equired d date tering 0.00 0.00	\$0 predures to ensure ginal document and t is the record revi of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e every document re d all copies or repro ew date, and the fir r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 equiring an ductions of the hal date is the al costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	irrigator's sea original docu	I be clearly visiblument, including	e and legible on contracts. Date i estimate	0.00 d/or pro the orig equired d date tering 0.00 0.00 0.00 0.00	\$0 pocedures to ensure ginal document and 1 is the record revi of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e every document re d all copies or repro ew date, and the fir r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 equiring an ductions of the hal date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	irrigator's sea original docu ANNU/	ALIZE avoided	e and legible on contracts. Date e estimate costs before en	0.00 d/or pro the orig equired d date tering 0.00 0.00 0.00 0.00 0.00	\$0 predures to ensure ginal document and t is the record revi of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e every document re d all copies or repro ew date, and the fir r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 equiring an ductions of the hal date is the al costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	irrigator's sea original docu ANNU/ \$25 Estimated av	ALIZE avoided of a state of the second secon	e and legible on contracts. Date e estimate costs before en 2007 2007 27-May-2021 2008 2007 2007 2007 2007 2007 2007 2007	0.00 d/or pro equirec d date tering 0.00 0.00 0.00 0.00 1.27 0.00 's seal o exas. D	\$0 predures to ensure ginal document and t is the record revi- of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e every document re d all copies or repro ew date, and the fir r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$25	\$0 equiring an ductions of the hal date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



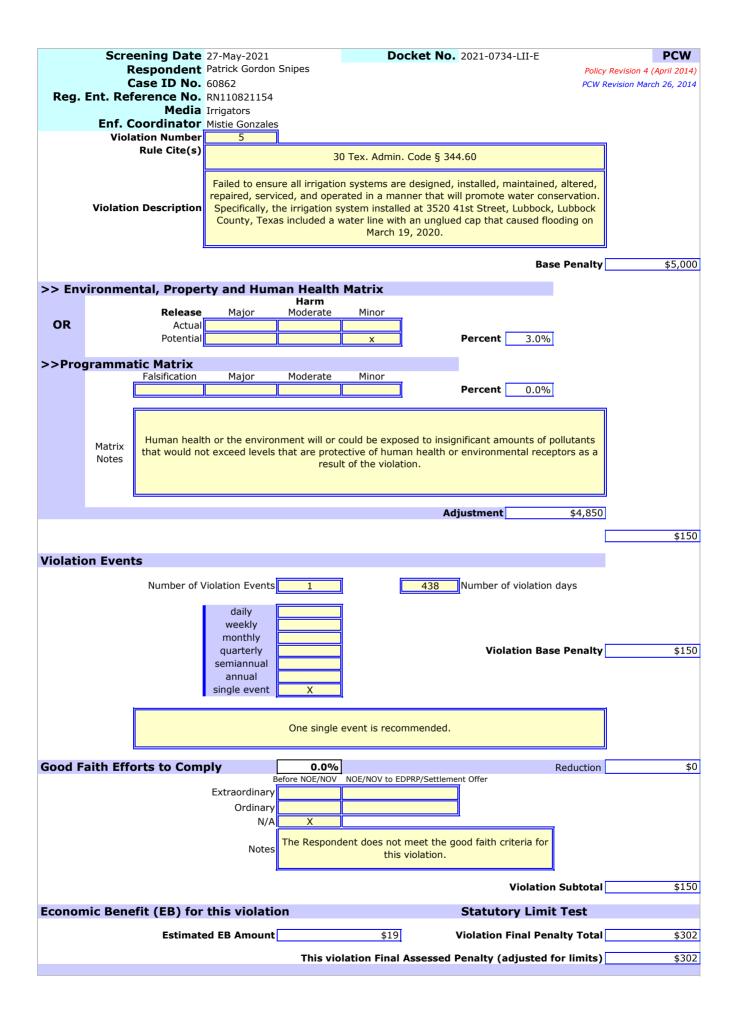
	E	conomic	Benefit	Wo	rksheet		
Respondent	Patrick Gordor	n Snipes					
Case ID No.	60862						
Reg. Ent. Reference No.	RN110821154						
Media Violation No.	Irrigators 2					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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	<u>\$0</u>
Training/Sampling	\$250	10-Sep-2020	29-Mar-2022	1.55	\$19	n/a	\$19
Remediation/Disposal	9250	10 000 2020		0.00	\$0	n/a	\$0
Permit Costs							
				0.00	\$0	n/a	\$0
Other (as needed)	Estimated co	st to implement n	neasures and/or	0.00 0.00	\$0 \$0 lures to ensure tha	n/a n/a at all permits are ob	\$0 \$0 tained prior to
			Date required is	0.00 r proced the rec	\$0 lures to ensure that	n/a	\$0 tained prior to
Other (as needed)	installing irr	igation systems. [Date required is dat	0.00 r procec the rec te of cor	\$0 lures to ensure tha ord review date, a mpliance.	n/a at all permits are ob	\$0 tained prior to he estimated
Other (as needed) Notes for DELAYED costs	installing irr	igation systems. [Date required is dat	0.00 r procec the rec te of cor	\$0 lures to ensure tha ord review date, a mpliance.	n/a at all permits are ob nd the final date is t r one-time avoided \$0	\$0 tained prior to he estimated
Other (as needed) Notes for DELAYED costs Avoided Costs	installing irr	igation systems. [Date required is dat	0.00 r procective reconstruction the reconstruction tering 0.00 0.00	\$0 Jures to ensure tha ord review date, a mpliance. item (except for \$0 \$0	n/a at all permits are ob nd the final date is t r one-time avoide \$0 \$0	\$0 tained prior to the estimated d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	installing irr	igation systems. [Date required is dat	0.00 r procect the rec te of cor tering 0.00	\$0 lures to ensure tha ord review date, a mpliance. item (except for \$0	n/a at all permits are ob nd the final date is t r one-time avoided \$0 \$0 \$0	\$0 tained prior to the estimated d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	installing irr	igation systems. [Date required is dat	0.00 r procective rec the rec te of con tering 0.00 0.00 0.00	\$0 Jures to ensure tha ord review date, a mpliance. item (except for \$0 \$0 \$0 \$0 \$0	n/a at all permits are ob nd the final date is t r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 tained prior to the estimated d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	installing irr	igation systems. [Date required is dat	0.00 r procective rec the rec te of con tering 0.00 0.00 0.00	\$0 Jures to ensure that ord review date, a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a at all permits are ob nd the final date is t r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tained prior to the estimated (costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	installing irr	igation systems. [Date required is dat	0.00 r procect the rec te of correct 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 Jures to ensure that ord review date, a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a at all permits are ob nd the final date is t r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tained prior to the estimated \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	installing irr	igation systems. [Date required is dat	0.00 r procect the rected of content 0.00 0.00 0.00 0.00 0.00	\$0 Jures to ensure that ord review date, a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a at all permits are ob nd the final date is t r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tained prior to the estimated (costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	ANNU/	ALIZE avoided c	Date required is date costs before er costs costs before er costs costs co	0.00 the rec e of con 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$0 Jures to ensure tha ord review date, a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a at all permits are ob nd the final date is t r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tained prior to the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	ANNU/	ALIZE avoided c	Date required is date costs before er costs costs before er costs costs co	0.00 the rec e of con 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$0 Jures to ensure tha ord review date, a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a at all permits are ob nd the final date is t r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 tained prior to the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



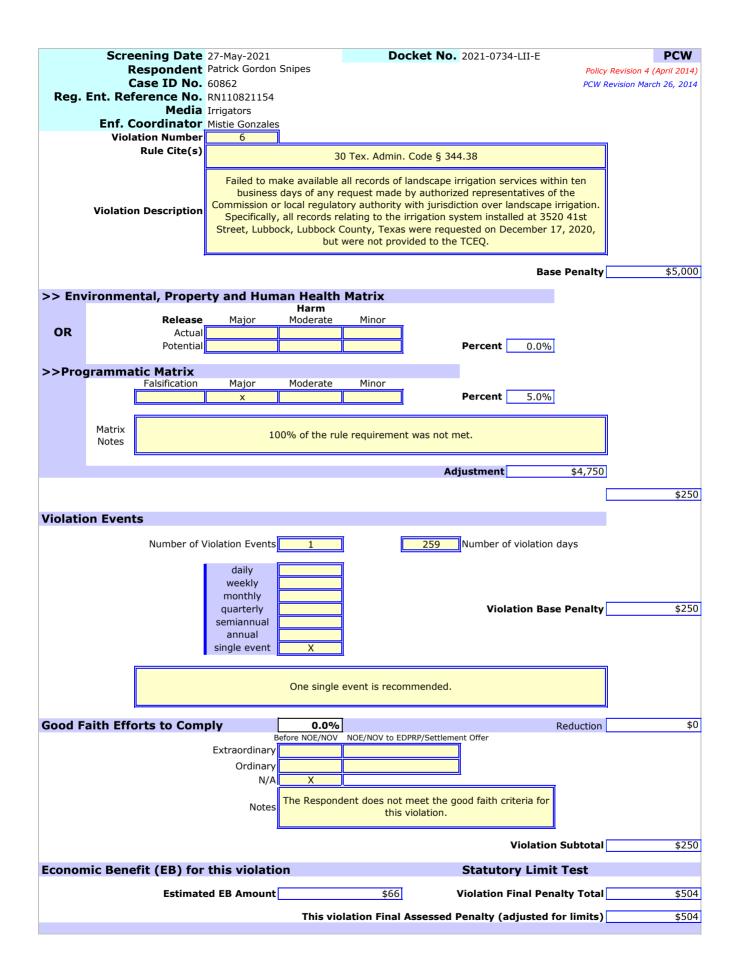
	L	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.	Patrick Gordon	n Snipes					
Reg. Ent. Reference No.						Percent Interest	Years of
Violation No.	3					Percent Interest	Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs	; 	1			+0	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed) Engineering/Construction		1		0.00	\$0	\$0 \$0	\$0 \$0
Lingineering/construction				0.00	\$0	n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$250	10-Sep-2020	29-Mar-2022	1.55	\$19	n/a	\$19
Remediation/Disposal	<u> </u>	10 305 2020	25 Mai 2022	0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
						e required statemen	
Notes for DELAYED costs	Texas is regu Austin, Texas	lated by the Texa 78711-3087. TC	as Commission of EQ's website is: e required is the	on Envir www.to	onmental Quality ceq.texas.gov" is ir I review date, and	e required statemen (TCEQ), MC-235, P. ncluded on all bids a the final date is the	O. Box 13087, nd contracts to
Notes for DELAYED costs	Texas is regu Austin, Texas install an irriga	ilated by the Texa 78711-3087. TCI ation system. Dat	as Commission of EQ's website is: e required is the	on Envir www.to e record of comp	onmental Quality ceq.texas.gov" is ir l review date, and liance.	(TCEQ), MC-235, P. ncluded on all bids a	O. Box 13087, nd contracts to estimated date
	Texas is regu Austin, Texas install an irriga	ilated by the Texa 78711-3087. TCI ation system. Dat	as Commission of EQ's website is: e required is the	tering	eonmental Quality eq.texas.gov" is ir I review date, and liance. item (except for \$0	(TCEQ), MC-235, P. Included on all bids a the final date is the r one-time avoide \$0	O. Box 13087, nd contracts to estimated date d costs) \$0
Avoided Costs Disposal Personnel	Texas is regu Austin, Texas install an irriga	ilated by the Texa 78711-3087. TCI ation system. Dat	as Commission of EQ's website is: e required is the	record of comp tering 0.00	interm (except for \$0 \$0 \$0 \$0 \$0	(TCEQ), MC-235, P. Included on all bids a the final date is the r one-time avoide \$0 \$0	O. Box 13087, nd contracts to estimated date d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Texas is regu Austin, Texas install an irriga	ilated by the Texa 78711-3087. TCI ation system. Dat	as Commission of EQ's website is: e required is the	tering 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	(TCEQ), MC-235, P. Included on all bids a the final date is the r one-time avoide \$0 \$0 \$0	O. Box 13087, nd contracts to estimated date d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Texas is regu Austin, Texas install an irriga	ilated by the Texa 78711-3087. TCI ation system. Dat	as Commission of EQ's website is: e required is the	tering 0.00 0.00 0.00 0.00	onmental Quality ceq.texas.gov" is ir l review date, and liance. item (except for \$0 \$0 \$0 \$0 \$0	(TCEQ), MC-235, P. Included on all bids a the final date is the r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	0. Box 13087, nd contracts to estimated date d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Texas is regu Austin, Texas install an irriga	ALIZE avoided c	as Commission of EQ's website is: e required is the costs before en	tering 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	(TCEQ), MC-235, P. Included on all bids a the final date is the r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	0. Box 13087, nd contracts to estimated date stimated date \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Texas is regu Austin, Texas install an irriga	Ilated by the Texa 78711-3087. TCI ation system. Dat	as Commission of EQ's website is: e required is the	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	(TCEQ), MC-235, P. Included on all bids a the final date is the r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$25	O. Box 13087, nd contracts to estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Texas is regu Austin, Texas install an irriga ANNUA \$25 Estimated	ALIZE avoided c	as Commission of EQ's website is: e required is the costs before en 27-May-2021 e required TCEC Street, Lubbool	tering 0.00 0.00 0.00 0.00 0.00 0.00 1.27 0.00 2 staten <, Lubbo	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	(TCEQ), MC-235, P. Included on all bids a the final date is the r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	O. Box 13087, nd contracts to estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



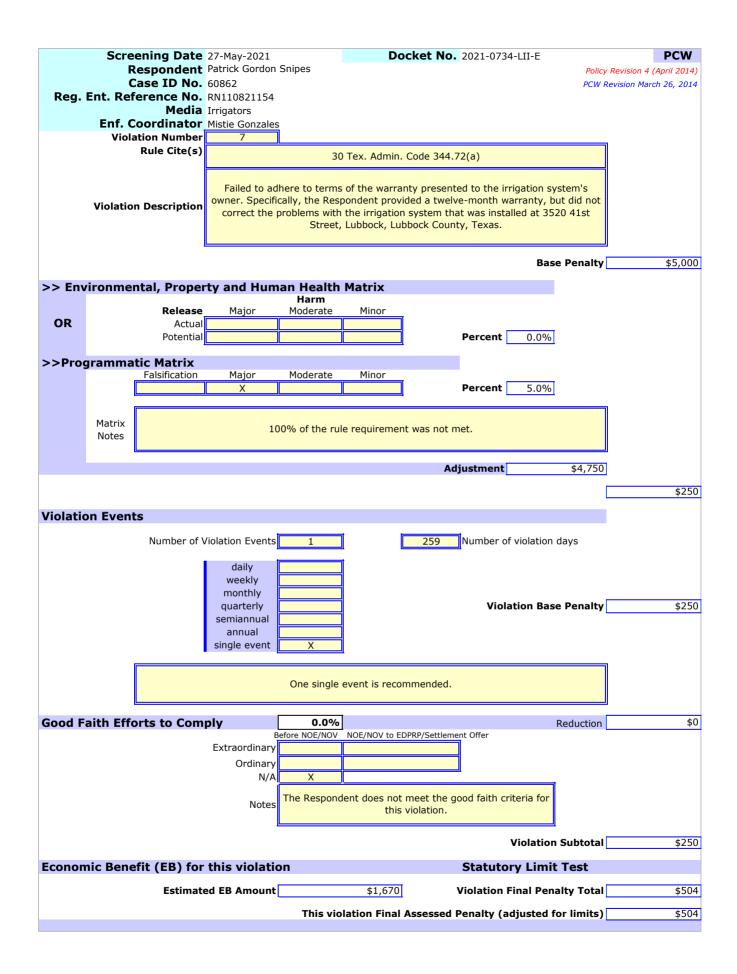
Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amour Item Description Delayed Costs Equipment Buildings Other (as needed) 0.00 \$0 \$0 \$0 \$0 Costs Saved \$0 \$0 \$0 \$0 \$0 \$0 Costs Saved \$0 \$0 \$0 \$0 \$0 \$0 Buildings Other (as needed) 0.00 \$0 </th <th></th> <th>E</th> <th>conomic</th> <th>Benefit</th> <th>WO</th> <th>rksheet</th> <th></th> <th></th>		E	conomic	Benefit	WO	rksheet		
Reg. Ent. Reference No. RN110821154 Media Irrigators Violation No. 4 Percent Interest Saved 5.0 Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amour Item Description Equipment Buildings Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed) 0.00 \$0 <th>Respondent</th> <th>Patrick Gordon</th> <th>n Snipes</th> <th></th> <th></th> <th></th> <th></th> <th></th>	Respondent	Patrick Gordon	n Snipes					
Media Violation No. Irrigators 4 Percent Interest Saved Description Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amour Delayed Costs Equipment Buildings Buildings Other (as needed) Land 0.00 \$0 \$0 \$0 Land 0.00 \$0 n/a \$0 Accord Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)	Case ID No.	60862						
Media Violation No. Irrigators 4 Percent Interest Saved Description Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amour Delayed Costs Equipment Buildings Buildings Other (as needed) Land 0.00 \$0 \$0 \$0 Land 0.00 \$0 n/a \$0 Accord Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)	Reg. Ent. Reference No.	RN110821154	ŀ					
Violation No. 4 Percent Interest 5.0 Item Cost Date Required Final Date Yrs Interest Saved Depreciation 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 Record Keeping System 0.00 \$0 n/a \$0 Remediation/Disposal 9250 10:Sep-2020 29:Mar-2022 1;5 \$19 n/a \$19 Permit Costs 0.00 \$0 \$0 \$0 \$0 \$19 \$1/a \$250 Notes for DELAYED costs Estimated cost to implement measures and/or procedures to ensure backflow prevention devices are test prior to being placed in service. Date required is the record review date, and the final date is the estimat date of compliance. Disposal Personnel 0.00 \$0 \$0 \$0 Supplies/Equipment Financial Assurance 0.00 \$0 \$0 \$0 ONE-TIME avoided costs 0.00 \$0 \$0 \$0								Years of
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Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amour Item Description Delayed Costs 0.00 \$0 <th>Violation No.</th> <th>• •</th> <th></th> <th></th> <th></th> <th></th> <th>FO</th> <th>1</th>	Violation No.	• •					FO	1
Item Description Delayed Costs Equipment Buildings Delayed Costs Equipment Buildings Delayed Costs Other (as needed) D.00 \$0 \$0 Disposal Permit Costs Other (as needed) D.00 \$0 \$0 Remediation/Disposal Permit Costs D.00 \$0		Thomas Count	Data Danuinad	Einel Data	Vera	Turbourset Coursed		
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Other (as needed) 0.00 0.00 0.00 0.00 0.00 0.00	Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	prior to being	placed in service	. Date required dat	procedu is the re- te of cor 0.00 0.00 0.00 0.00 0.00	\$0 ares to ensure bac accord review date, mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a kflow prevention dev and the final date is r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 vices are teste s the estimate d costs) \$0 \$0 \$0 \$0 \$0 \$0
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Notes for AVOIDED costs Estimated cost to test the backflow prevention assembly for the irrigation system at 3520 41st Street, Lubbock, Lubbock County Texas is captured in the Economic Benefit for Violation No. 7.	Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	s ANNU	ALIZE avoided of a service	Date required dat	procedu is the re- te of con- 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$0 pres to ensure bac cord review date, mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a kflow prevention dev and the final date is r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 vices are test the estimate d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
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Notes for AVOIDED costs Lubbock, Lubbock County Texas is captured in the Economic Benefit for Violation No. 7.	Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) Notes for AVOIDED costs	s ANNU	ALIZE avoided of a service	Date required dat	procedu is the re- te of con- 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$0 rres to ensure bac cord review date, mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a kflow prevention dev and the final date is r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 vices are teste s the estimate d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Respondent Case ID No. Patrick Gordon Snipes Reg. Ent. Reference No. RN110821154 Media Violation No. Irrigators Percent Interest Depreciation Years of Depreciation Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amount Item Description Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amount Buildings 0.00 \$0		E	conomic	Benefit	Wo	rksheet			
Reg. Ent. Reference No. Media Violation No. RN110821154 Irrigators Percent Interest Vears of Depreciation 1 5 15 Item Cost Date Required Final Date Yrs Interest Saved EB Amount Delayed Costs Equipment Buildings Other (as needed) Costs Saved EB Amount Delayed Costs Equipment Buildings Other (as needed) Costs Saved 50 Saved \$0 Costs Saved EB Amount Bequipment Buildings Other (as needed) \$0.00 \$0 \$0 \$0 \$0 Equipment Buildings Costs Saved EB Amount Bequipment Buildings Other (as needed) Land 0.00 \$0 \$1 Record Keeping System Training/Sampling \$250 10-Sep-2020 29-Mar-2022 1.55 \$19 n./a \$19 Permit Costs 0.00 \$0 n./a \$0 Other (as needed) Estimated cost to implement measures and/or procedu	Respondent	Patrick Gordor	n Snipes						
Reg. Ent. Reference No. Media Violation No. RN110821154 Irrigators Percent Interest Vears of Depreciation 1 5 15 Item Cost Date Required Final Date Yrs Interest Saved EB Amount Delayed Costs Equipment Buildings Other (as needed) Costs Saved EB Amount Delayed Costs Equipment Buildings Other (as needed) Costs Saved 50 Saved \$0 Costs Saved EB Amount Bequipment Buildings Other (as needed) \$0.00 \$0 \$0 \$0 \$0 Equipment Buildings Costs Saved EB Amount Bequipment Buildings Other (as needed) Land 0.00 \$0 \$1 Record Keeping System Training/Sampling \$250 10-Sep-2020 29-Mar-2022 1.55 \$19 n./a \$19 Permit Costs 0.00 \$0 n./a \$0 Other (as needed) Estimated cost to implement measures and/or procedu	Case ID No.	60862	•						
Media Violation No. 5 Irrigators 5 Years of Depreciation Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amount Item Description Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amount Delayed Costs Equipment 0.00 \$0 \$0 \$0 \$0 Buildings Other (as needed) 0.00 \$0 \$0 \$0 \$0 Engineering/Construction 0.00 \$0 \$0 \$0 \$0 Record Keeping System Training/Sampling \$250 10-Sep-2020 29-Mar-2022 1.55 \$19 n/a \$19 Remediation/Disposal Permit Costs 9 0.00 \$0 n/a \$0 \$0 Ites for DELAYED costs Estimated cost to implement measures and/or procedures to ensure that all irrigation systems are designed, installed, maintained, altered, repaired, serviced, and operated in a manner that will promote water conservation. Date required is the record review date, and the final date is the estimated date of compliance. Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) \$0 Personnel 0.00 \$0 \$0									
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Disposal 0.00 \$0 \$0 Personnel 0.00 \$0 \$0 \$0	Avoided Costs	ANNU	ALIZE avoided o	osts before er			r one-time avoide	d costs)	
		[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	Other (as needed)				0.00	\$0	\$0	\$0	
Notes for AVOIDED costs	Notes for AVOIDED costs								
Approx. Cost of Compliance \$250 TOTAL \$19	Approx. Cost of Compliance	1	+ 2 F O			ΤΟΤΑΙ		¢10	
			<u>\$</u> 250			TOTAL		\$19	



	E	conomic	Benefit	Wo	rksheet		
Respondent	Patrick Gordor	n Snipes					
Case ID No.	60862						
Reg. Ent. Reference No.	RN110821154						
Media	Irrigators					Percent Interest	Years of
Violation No.	6					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$250	6-Jan-2021	29-Mar-2022	1.22	\$15	n/a	\$15
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)		· · · · · · · · · · · · · · · · · · ·		0.00 procedu	\$0 ures to ensure tha	n/a t all records of lands	\$0 scape irrigation
Other (as needed)	services are m the Commissio	nade available wit on or local regulat record review o	hin ten busines ory authority w late, and the fir	procedu s days o ith juris	\$0 ures to ensure tha f any request mac diction over landso is the estimated o	n/a It all records of lands de by authorized rep cape irrigation. Date late of compliance.	\$0 scape irrigation presentatives of required is the
Other (as needed)	services are m the Commissio	nade available wit on or local regulat record review o	hin ten busines ory authority w late, and the fir	procedu s days o ith juris nal date	\$0 ures to ensure tha f any request mac diction over landso is the estimated o item (except fo	n/a It all records of lands de by authorized rep cape irrigation. Date late of compliance. r one-time avoided	\$0 scape irrigation presentatives of required is the d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	services are m the Commissio	nade available wit on or local regulat record review o	hin ten busines ory authority w late, and the fir	procedu s days c ith juris nal date ntering	\$0 ures to ensure tha f any request mac diction over landso is the estimated o item (except for \$0	n/a It all records of lands de by authorized rep cape irrigation. Date late of compliance. r one-time avoide \$0	\$0 scape irrigation presentatives of required is the d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	services are m the Commissio	nade available wit on or local regulat record review o	hin ten busines ory authority w late, and the fir	0.00 procedu s days o ith juris al date tering 0.00	\$0 ures to ensure that f any request mac diction over landso is the estimated of item (except for \$0 \$0	n/a t all records of lands te by authorized rep cape irrigation. Date late of compliance. r one-time avoider \$0 \$0	\$0 scape irrigation presentatives of required is the d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling	services are m the Commissio	nade available wit on or local regulat record review o	hin ten busines ory authority w late, and the fir	0.00 procedu s days o ith juris al date tering 0.00 0.00	\$0 ures to ensure that f any request mac diction over landsc is the estimated c item (except for \$0 \$0 \$0	n/a t all records of lands t	\$0 scape irrigation presentatives o required is the d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	services are m the Commissio	nade available wit on or local regulat record review o	hin ten busines ory authority w late, and the fir	0.00 procedu s days o ith juris nal date 0.00 0.00 0.00 0.00	\$0 Jres to ensure that f any request mace diction over landso is the estimated of so \$0 \$0 \$0 \$0 \$0	n/a t all records of lands de by authorized rep cape irrigation. Date date of compliance. r one-time avoided \$0 \$0 \$0 \$0 \$0	\$0 scape irrigation presentatives o required is the d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	services are m the Commission ANNU/	ALIZE avoided c	hin ten busines: ory authority w late, and the fir osts before er	0.00 procedu s days c ith juris al date tering 0.00 0.00 0.00 0.00	\$0 ures to ensure tha f any request mac diction over landso is the estimated o item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a t all records of lands de by authorized rep cape irrigation. Date late of compliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 scape irrigation presentatives o required is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	services are m the Commissio	nade available wit on or local regulat record review o	hin ten busines ory authority w late, and the fir	0.00 procedu s days o ith juris nal date 0.00 0.00 0.00 0.00 0.00 0.00 0.39	\$0 ures to ensure tha f any request mac diction over landso is the estimated of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a t all records of lands de by authorized rep cape irrigation. Date late of compliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 scape irrigation presentatives o required is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Supplies/Equipment Financial Assurance	services are m the Commission ANNU/	ALIZE avoided c	hin ten busines: ory authority w late, and the fir osts before er	0.00 procedu s days c ith juris al date tering 0.00 0.00 0.00 0.00	\$0 ures to ensure tha f any request mac diction over landso is the estimated o item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a t all records of lands de by authorized rep cape irrigation. Date late of compliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 scape irrigation presentatives o required is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	services are m the Commission ANNU/ Services \$50 Estimated of	ALIZE avoided control of the provided cost to provided co	hin ten business ory authority w late, and the fir osts before er 27-May-2021 rovide all record ubbock, Lubbock	0.00 procedu s days of ith juris al date 0.00	\$0 ures to ensure tha f any request mac diction over landso is the estimated of tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a t all records of lands de by authorized reg- cape irrigation. Date late of compliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 scape irrigation presentatives o required is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent		n Snipes					
Case ID No.	60862						
Reg. Ent. Reference No.	RN110821154						
	Irrigators						Years of
Violation No.	-					Percent Interest	Depreciation
						5.0	. 15
	Thom Cost	Data Deguined	Einel Date	Vera	Interest Saved	Costs Saved	EB Amount
		Date Required	Final Date	Trs	Interest Saved	Costs Saved	EB Amount
Item Description	l.						
Delayed Costs							
Delayed Costs Equipment	· · · · · · · · · · · · · · · · · · ·	1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	<u>\$0</u> \$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	<u>\$0</u>
Remediation/Disposal				0.00	\$0	n/a	<u>\$0</u>
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs							
			osts bafora or	toring	item (except for	r one-time avoida	d costs)
Avoided Costs	ANNU/	ALIZE avoided c	osts before en			r one-time avoide	,
Avoided Costs Disposal	ANNU	ALIZE avoided c	osts before en	0.00	\$0	\$0	\$0
Avoided Costs Disposal Personnel		ALIZE avoided c	osts before en	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	ANNU/	ALIZE avoided c	osts before en	0.00	\$0 \$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Avoided Costs Disposal Personnel	ANNU/	ALIZE avoided c	osts before en	0.00 0.00 0.00	\$0 \$0	\$0 \$0	\$0 \$0
Avoided Costs Disposal Personnel Inspection/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 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	\$1,613 Estimated co the problems Texas, ir appropriately	st to adhere to te with the irrigation cluding obtaining y and not spraying	27-May-2021 rms of the warr n system that w a permit to ins g water onto a t sembly. Date re	0.00 0.00 0.00 0.00 0.71 0.00 0.71 0.00	\$0 \$0 \$0 \$0 \$0 \$57 \$0 esented to the irrigalled at 3520 41st irrigation system, ill nor leaking wate is the investigation	\$0 \$0 \$0 \$0 \$0 \$0 \$1,613	\$0 \$0 \$0 \$0 \$1,670 \$0 er and correct bbock County, n is zoned ht, and testing
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	\$1,613 Estimated co the problems Texas, ir appropriately	st to adhere to te with the irrigation cluding obtaining y and not spraying	27-May-2021 rms of the warr n system that w a permit to ins g water onto a t sembly. Date re	0.00 0.00 0.00 0.00 0.71 0.00 0.71 0.00	\$0 \$0 \$0 \$0 \$0 \$57 \$0 esented to the irrigalled at 3520 41st irrigation system, ill nor leaking wate is the investigation	\$0 \$0 \$0 \$0 \$1,613 \$0 \$2 \$0 \$1,613 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$2 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$1,670 \$0 er and corree bbock County n is zoned ht, and testing

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Compliance History Report for CN605683002, RN110821154, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator:	CN605683002, SNIPES, PATRICK GORDON	Classification: NOT APPLICA	ABLE Rating: N/A							
Regulated Entity:	RN110821154, SNIPES, PATRICK GORDON	Classification: NOT APPLIC	ABLE Rating: N/A							
Complexity Points:	N/A	Repeat Violator: N/A								
CH Group:	14 - Other									
Location:	10801 Belton Avenue, Lubbock, Texas									
TCEQ Region:	REGION 02 - LUBBOCK									
ID Number(s): LANDSCAPE IRRIGATION L LI0025245 Compliance History Peri	ICENSING LICENSE od: September 01, 2016 to August 31, 2	021 Rating Year: 2021	Rating Date: 09/01/2021							
Date Compliance History Report Prepared: June 16, 2022										
Agency Decision Requiring Compliance History: Enforcement										
Component Period Selected: June 16, 2017 to June 16, 2022										
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.										
Name: Alejandro Laje		Phone: (512) 239-25	47							
Site and Owner/Operation	ator History:									
1) Has the site been in exister	nce and/or operation for the full five-year c	ompliance period?	NO							
2) Has there been a (known) of	uring the compliance period?	NO								
Components (Multimedia) for the Site Are Listed in Sections A - J										
A. Final Orders, court judgments, and consent decrees: N/A										
B. Criminal convictions	:									

N/A

- C. Chronic excessive emissions events: $$N\!/\!A$$
- D. The approval dates of investigations (CCEDS Inv. Track. No.): $_{\mbox{$N/A$}}$

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. N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs): $_{\mbox{N/A}}$

- H. Voluntary on-site compliance assessment dates: $_{\mbox{N/A}}$
- I. Participation in a voluntary pollution reduction program: $_{\mbox{N/A}}$

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING PATRICK GORDON SNIPES; RN110821154

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

DEFAULT ORDER DOCKET NO. 2021-0734-LII-E

On _______, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered the Executive Director's Preliminary Report and Petition, filed pursuant to TEX. WATER CODE chs. 7 and 37, TEX. OCC. CODE ch. 1903, and the rules of the TCEQ, which requests appropriate relief, including the imposition of an administrative penalty and corrective action of the respondent. The respondent made the subject of this Order is Patrick Gordon Snipes ("Respondent").

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

FINDINGS OF FACT

- 1. Respondent owned and operated a business located at 10801 Belton Avenue in Lubbock, Lubbock County, Texas (the "Business"). Respondent holds TCEQ Irrigator License No. LI0025245 and sells, designs, offers consultations regarding, installs, maintains, alters, repairs, and/or services landscape irrigation systems. Therefore, Respondent is subject to TCEQ jurisdiction pursuant to TEX. WATER CODE ch. 37 and TEX. OCC. CODE ch. 1903.
- 2. During a record review conducted on September 10, 2020, TCEQ staff documented that Respondent:
 - a. Failed to ensure that every document requiring an irrigator's seal has the seal clearly visible and legible on the original document and all copies or reproductions of the original document. Specifically, the contract to install an irrigation system at 3520 41st Street in Lubbock, Lubbock County, Texas did not include the irrigator's seal;
 - b. Failed to obtain all permits and inspections required to install an irrigation system. Specifically, Respondent did not obtain a permit from the City of Lubbock prior to installing an irrigation system at 3520 41st Street in Lubbock, Lubbock County, Texas;
 - c. Failed to include the required TCEQ statement on all written estimates, proposals, bids, and invoices relating to the installation or repair of an irrigation system. Specifically, the bids and contract entered into by Respondent on February 20, 2020, for installation of an irrigation system at 3520 41st Street in Lubbock, Lubbock County, Texas did not include the required statement, "Irrigation in Texas is regulated by the Texas Commission on Environmental Quality (TCEQ), MC-235, P.O. Box 13087, Austin, Texas 78711-3087. TCEQ's website is: <u>www.tceq.texas.gov</u>";
 - d. Failed to ensure the backflow prevention assembly is tested prior to being placed in service. Specifically, Respondent put a backflow prevention assembly into service for the irrigation system at 3520 41st Street in Lubbock, Lubbock County, Texas without first testing the device;

- e. Failed to ensure all irrigation systems are designed, installed, maintained, altered, repaired, serviced, and operated in a manner that will promote water conservation. Specifically, the irrigation system installed at 3520 41st Street in Lubbock, Lubbock County, Texas included a water line with an unglued cap that caused flooding on March 19, 2020;
- f. Failed to make available all records of landscape irrigation services within ten business days of any request made by authorized representatives of the Commission or local regulatory authority with jurisdiction over landscape irrigation. Specifically, all records relating to the irrigation system installed at 3520 41st Street in Lubbock, Lubbock County, Texas were requested on December 17, 2020, but were not provided to the TCEQ; and
- g. Failed to adhere to terms of the warranty presented to the irrigation system's owner. Specifically, Respondent provided a twelve-month warranty, but did not correct the problems with the irrigation system that was installed at 3520 41st Street in Lubbock, Lubbock County, Texas.
- 3. The Executive Director filed the "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of Patrick Gordon Snipes" (the "EDPRP") in the TCEQ Chief Clerk's office on February 21, 2024.
- 4. By letter dated February 21, 2024, sent to Respondent's last known address via certified mail, return receipt requested, postage prepaid, the Executive Director served Respondent with notice of the EDPRP. According to the return receipt "green card," Respondent received notice of the EDPRP on February 26, 2024, as evidenced by the signature on the card.
- 5. More than 20 days have elapsed since Respondent received notice of the EDPRP. Respondent failed to file an answer and failed to request a hearing.

CONCLUSIONS OF LAW

- 1. As evidenced by Finding of Fact No. 1, Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. OCC. CODE ch. 1903 and the rules of the TCEQ.
- 2. As evidenced by Finding of Fact No. 2.a., Respondent failed to ensure that every document requiring an irrigator's seal has the seal clearly visible and legible on the original document and all copies or reproductions of the original document, in violation of 30 TEX. ADMIN. CODE §§ 344.42(a) and 344.71(a).
- 3. As evidenced by Finding of Fact No. 2.b., Respondent failed to obtain all permits and inspections required to install an irrigation system, in violation of 30 Tex. ADMIN. CODE § 344.35(d)(2).
- 4. As evidenced by Finding of Fact No. 2.c., Respondent failed to include the required TCEQ statement on all written estimates, proposals, bids, and invoices relating to the installation or repair of an irrigation system, in violation of 30 Tex. ADMIN. CODE § 344.71(a) and (b).
- 5. As evidenced by Finding of Fact No. 2.d., Respondent failed to ensure the backflow prevention assembly is tested prior to being placed in service, in violation of 30 Tex. ADMIN. CODE § 344.52(c).
- 6. As evidenced by Finding of Fact No. 2.e., Respondent failed to ensure all irrigation systems are designed, installed, maintained, altered, repaired, serviced, and operated in a manner that will promote water conservation, in violation of 30 Tex. ADMIN. CODE § 344.60.

- 7. As evidenced by Finding of Fact No. 2.f., Respondent failed to make available all records of landscape irrigation services within ten business days of any request made by authorized representatives of the Commission or local regulatory authority with jurisdiction over landscape irrigation, in violation of 30 Tex. ADMIN. CODE § 344.38.
- 8. As evidenced by Finding of Fact No. 2.g., Respondent failed to adhere to terms of the warranty presented to the irrigation system's owner, in violation of 30 Tex. ADMIN. CODE § 344.72(a).
- 9. As evidenced by Findings of Fact Nos. 3 and 4, the Executive Director timely served Respondent with proper notice of the EDPRP, as required by TEX. WATER CODE § 7.055 and 30 TEX. ADMIN. CODE § 70.104(b)(1).
- 10. As evidenced by Finding of Fact No. 5, Respondent failed to file a timely answer as required by Tex. WATER CODE § 7.056 and 30 Tex. ADMIN. CODE § 70.105. Pursuant to Tex. WATER CODE § 7.057 and 30 Tex. ADMIN. CODE § 70.106, the Commission may enter a Default Order against Respondent and assess the penalty recommended by the Executive Director.
- 11. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against Respondent for violations of state statutes within TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 12. An administrative penalty in the amount of \$3,525 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053.
- 13. TEX. WATER CODE §§ 5.102 and 7.002 authorize the Commission to issue orders and make determinations necessary to effectuate the purposes of the statutes within its jurisdiction.

ORDERING PROVISIONS

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

- 1. Respondent is assessed an administrative penalty in the amount of \$3,525 for violations of state statutes and rules of the TCEQ. The payment of this penalty and Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations which are not raised here.
- 2. The penalty assessed by this Order shall be paid within 30 days after the effective date of this Order. All checks submitted to pay the penalty imposed by this Order shall be made out to TCEQ and shall be sent with the notation "Re: Patrick Gordon Snipes; Docket No. 2021-0734-LII-E" to:

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

- 3. Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Implement measures and/or procedures to ensure every document requiring an irrigator's seal has the seal clearly visible and legible on the original document and all copies or reproductions of the original document, including contracts, in accordance with 30 TEX. ADMIN. CODE § 344.42 and 344.71 (Conclusion of Law No. 2);

- ii. Implement measures and/or procedures to ensure that all permits are obtained prior to installing irrigation systems, in accordance with 30 Tex. ADMIN. CODE § 344.35 (Conclusion of Law No. 3);
- iii. Implement measures and/or procedures to ensure the required statement "Irrigation in Texas is regulated by the Texas Commission on Environmental Quality (TCEQ), MC-235, P.O. Box 13087, Austin, Texas 78711-3087. TCEQ's website is: www.tceq.texas.gov" is included on all bids and contracts to install an irrigation system, in accordance with 30 Tex. ADMIN. CODE § 344.71 (Conclusion of Law No. 4);
- iv. Implement measures and/or procedures to ensure backflow prevention devices are tested prior to being placed in service, in accordance with 30 TEX. ADMIN. CODE § 344.52 (Conclusion of Law No. 5);
- v. Implement measures and/or procedures to ensure that all irrigation systems are designed, installed, maintained, altered, repaired, serviced, and operated in a manner that will promote water conservation, in accordance with 30 Tex. ADMIN. CODE § 344.60 (Conclusion of Law No. 6); and
- vi. Implement measures and/or procedures to ensure that all records of landscape irrigation services are made available within ten business days of any request made by authorized representatives of the Commission or local regulatory authority with jurisdiction over landscape irrigation, in accordance with 30 Tex. ADMIN. CODE § 344.38 (Conclusion of Law No. 7).
- b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.a.i. through 3.a.vi. The certification shall be signed by Respondent and shall include the following certification language:

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

Program Support Section Manager Office of Compliance and Enforcement, MC 174 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- 4. All relief not expressly granted in this Order is denied.
- 5. The provisions of this Order shall apply to and be binding upon Respondent. Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the business operations referenced in this Order.

- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by Respondent shall be made in writing to the Executive Director. Extensions are not effective until Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
- 7. If Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Respondent's failure to comply is not a violation of this Order. Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Respondent shall notify the Executive Director within seven days after Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 8. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to Respondent if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions in this Order.
- 9. 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.
- 10. 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.
- 11. The Chief Clerk shall provide a copy of this fully executed Order to each of the parties. By law, the effective date of this Order shall be the date the Order is final, as provided by 30 Tex. ADMIN. CODE § 70.106(d) and Tex. GOV'T CODE § 2001.144.

Patrick Gordon Snipes Docket No. 2021-0734-LII-E Page 6

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



UNSWORN DECLARATION OF CYNTHIA K. SIROIS

On behalf of the Executive Director of the Texas Commission on Environmental Quality, the 'Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of Patrick Gordon Snipes' (the "EDPRP") was filed in the TCEQ Chief Clerk's office on February 21, 2024.

The EDPRP was mailed to Respondent's last known address on February 21, 2024, via certified mail, return receipt requested, postage prepaid. According to the return receipt "green card," Respondent received notice of the EDPRP on February 26, 2024, as evidenced by the signature on the card.

More than 20 days have elapsed since Respondent received notice of the EDPRP. Respondent failed to file an answer and failed to request a hearing."

"My name is Cynthia K. Sirois, and I am an employee of the following governmental agency: Texas Commission on Environmental Quality. I am executing this declaration as part of my assigned duties and responsibilities. I declare under penalty of perjury that the foregoing is true and correct."

Executed in <u>Travis</u> County,

State of Texas,

on the <u>23th</u> day of <u>May</u>, 2024

Cynthra & Sirois

Declarant