

Executive Summary - Enforcement Matter - Case No. 67335
Young Men's Christian Association of the Greater Houston Area
RN101279412
Docket No. 2025-0207-MWD-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

MWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

YMCA Camp Cullen, located approximately 869 feet northeast of the intersection of Farm-to-Market Road 356 and Waltz Road, Trinity County

Type of Operation:

Wastewater treatment facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Past-Due Fees: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: December 26, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$17,076

Amount Deferred for Expedited Settlement: \$3,415

Total Paid to General Revenue: \$13,661

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: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: January 15, 2025

Date(s) of NOE(s): January 31, 2025

Executive Summary – Enforcement Matter – Case No. 67335
Young Men's Christian Association of the Greater Houston Area
RN101279412
Docket No. 2025-0207-MWD-E

Violation Information

1. Failed to comply with permitted effluent limitations. Specifically, a grab sample collected during the investigation revealed the Respondent exceeded the permitted limitation for chlorine residual of 4.0 milligrams per liter ("mg/L") with a result of 6.8 mg/L [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System Permit ("TPDES") No. WQ0011644001, Effluent Limitations and Monitoring Requirements No. 2].
2. Failed to ensure the Facility and all of its systems of collection, treatment, and disposal are properly operated maintained. Specifically, Pump Number 1 at the influent lift station was out of service [30 TEX. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0011644001, Operational Requirements No. 1].
3. Failed to clean the grease trap at least twice per month or at a higher frequency as required by the permit. Specifically, the grease trap records indicated it was cleaned quarterly [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0011644001, Other Requirements No. 5].
4. Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative for a period of three years. Specifically, the reduced pressure backflow assembly ("RPBA") test records for 2022, 2023, and 2024 were not provided [30 TEX. ADMIN. CODE § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(b)].
5. Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative for a period of three years. Specifically, the effluent flow meter calibration record for 2022 was not provided [30 TEX. ADMIN. CODE § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(b)].
6. Failed to maintain monitoring and reporting records at the Facility. Specifically, the April 9, 2024, effluent flow meter calibration records was missing quality assurance / quality control data such as the flow/staff gage readings before and after the calibration and the as found and as left total percent error of the secondary flow measuring device against the staff gauge [30 TEX. ADMIN. CODE § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(c)(vi)].
7. Failed to prevent an unauthorized discharge of wastewater into or adjacent to any water in the State. Specifically, the Respondent had reported one 5-gallon unauthorized discharge on September 4, 2023, at the 460 Cullen Loop lift station caused by pump failure [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and TPDES No. WQ0011644001, Permit Conditions No. 2(g)].

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Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective measures:

- a. By September 4, 2023, ceased the discharge at the 460 Cullen Loop lift station, remediated the area, and repaired the pump to prevent future unauthorized discharges;
- b. By January 17, 2025, performed cleaning and electrical maintenance to Pump Number 1 at the influent lift station and returned it to service;
- c. By February 26, 2025, calibrated the effluent flow meter, including the quality assurance/quality control data on the report;
- d. By March 7, 2025, submitted the RPBA test record from February 16, 2024, a standard operating procedure (“SOP”) for retention of the test records for three years, and a SOP for retention of flow meter calibration records for three years; and
- e. By April 4, 2025, submitted a log sheet for monitoring the grease trap levels biweekly.

Technical Requirements:

The Order will require the Respondent to, within 130 days, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0011644001, including specific corrective actions that were implemented at the Facility to return to compliance, and copies of the most current self-reported discharge monitoring reports demonstrating at least three consecutive months of compliance all permitted effluent limitations.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Taylor Williamson, Enforcement Division, Enforcement Team 1, MC 219, (512) 239-2097; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

Respondent: Clark D. Baker, President, Young Men's Christian Association of the Greater Houston Area, 3110 Hayes Road, Houston, Texas 77082
Gerald Cottle, Vice President of Facilities, Young Men's Christian Association of the Greater Houston Area, 3110 Hayes Road, Houston, Texas 77082

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	3-Feb-2025	Screening	4-Feb-2025	EPA Due	
	PCW	4-Apr-2025				

RESPONDENT/FACILITY INFORMATION	
Respondent	Young Men's Christian Association of the Greater Houston Area
Reg. Ent. Ref. No.	RN101279412
Facility/Site Region	10-Beaumont
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	67335	No. of Violations	7
Docket No.	2025-0207-MWD-E	Order Type	1660
Media Program(s)	Water Quality	Government/Non-Profit	Yes
Multi-Media		Enf. Coordinator	Taylor Williamson
		EC's Team	Enforcement Team 1
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$17,375
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ADJUSTMENTS (+/-) TO SUBTOTAL 1			
<small>Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.</small>			
Compliance History	10.0%	Adjustment	Subtotals 2, 3, & 7
Notes			\$1,737
Culpability	No	0.0%	Enhancement
Notes			Subtotal 4
			\$0
Good Faith Effort to Comply Total Adjustments			Subtotal 5
			-\$2,036
Economic Benefit			Subtotal 6
	0.0%	Enhancement*	\$0
Total EB Amounts	\$314	<small>*Capped at the Total EB \$ Amount</small>	
Estimated Cost of Compliance	\$7,540		

SUM OF SUBTOTALS 1-7	Final Subtotal	\$17,076
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
<small>Reduces or enhances the Final Subtotal by the indicated percentage.</small>			
Notes			
			Final Penalty Amount
			\$17,076

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$17,076
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DEFERRAL	20.0%	Reduction	Adjustment	-\$3,415
<small>Reduces the Final Assessed Penalty by the indicated percentage.</small>				
Notes				

PAYABLE PENALTY	\$13,661
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Screening Date 4-Feb-2025

Docket No. 2025-0207-MWD-E

PCW

Respondent Young Men's Christian Association of the Greater Houston Area

Policy Revision 5 (January 28, 2021)

Case ID No. 67335

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN101279412

Media Water Quality

Enf. Coordinator Taylor Williamson

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	2	10%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 10%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for two months of self-reported effluent violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 10%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 10%

Screening Date 4-Feb-2025

Docket No. 2025-0207-MWD-E

PCW

Respondent Young Men's Christian Association of the Greater Houston Area

Policy Revision 5 (January 28, 2021)

Case ID No. 67335

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN101279412

Media Water Quality

Enf. Coordinator Taylor Williamson

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and Texas Pollutant Discharge Elimination System Permit ("TPDES") No. WQ0011644001, Effluent Limitations and Monitoring Requirements No. 2

Violation Description Failed to comply with permitted effluent limitations. Specifically, a grab sample collected during the investigation revealed the Respondent exceeded the permitted limitation for chlorine residual of 4.0 milligrams per liter ("mg/L") with a result of 6.8 mg/L.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
Actual				x	15.0%
Potential					

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes Human health or the environment have been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1 Number of violation days 1

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$3,750

One quarterly event is recommended.

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 \$3,750

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$308

Violation Final Penalty Total \$4,125

This violation Final Assessed Penalty (adjusted for limits) \$4,125

Economic Benefit Worksheet

Respondent Young Men's Christian Association of the Greater Houston Area
Case ID No. 67335
Reg. Ent. Reference No. RN101279412
Media Water Quality
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				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)	\$5,000	15-Jan-2025	10-Apr-2026	1.23	\$308	n/a	\$308

Notes for DELAYED costs

Estimated other cost to determine the cause of noncompliance, make any necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations. The Date Required is the investigation date, and the Final Date is the estimated compliance date.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$5,000

TOTAL

\$308

Screening Date	4-Feb-2025	Docket No.	2025-0207-MWD-E	PCW
Respondent	Young Men's Christian Association of the Greater Houston Area			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	67335			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN101279412			
Media	Water Quality			
Enf. Coordinator	Taylor Williamson			
Violation Number	2			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and (5) and TPDES Permit No. WQ0011644001, Operational Requirements No. 1			
Violation Description	Failed to ensure the Facility and all of its systems of collection, treatment, and disposal are properly operated maintained. Specifically, Pump Number 1 at the influent lift station was out of service.			
		Base Penalty	\$25,000	

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				
	Potential			x	Percent 3.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
					Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to insignificant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$24,250

\$750

Violation Events

Number of Violation Events: 1 20 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$750

One quarterly event is recommended from the investigation date, January 15, 2025, to the screening date February 4, 2025.

Good Faith Efforts to Comply 25.0% Reduction \$187

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent achieved compliance by January 17, 2025.

Violation Subtotal \$563

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$0 **Violation Final Penalty Total** \$638

This violation Final Assessed Penalty (adjusted for limits) \$638

Economic Benefit Worksheet

Respondent Young Men's Christian Association of the Greater Houston Area
Case ID No. 67335
Reg. Ent. Reference No. RN101279412
Media Water Quality
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$690	15-Jan-2025	17-Jan-2025	0.01	\$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

Actual other cost to clean and repair Pump Number 1 at the influent lift station. The Date Required is the investigation date, and the Final Date is the compliance date.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$690

TOTAL

\$0

Screening Date	4-Feb-2025	Docket No.	2025-0207-MWD-E	PCW
Respondent	Young Men's Christian Association of the Greater Houston Area			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	67335			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN101279412			
Media	Water Quality			
Enf. Coordinator	Taylor Williamson			
Violation Number	3			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and TPDES Permit No. WQ0011644001, Other Requirements No. 5			
Violation Description	Failed to clean the grease trap at least twice per month or at a higher frequency as required by the permit. Specifically, the grease trap records indicated it was cleaned quarterly.			
		Base Penalty	\$25,000	

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				
	Potential			x	Percent 3.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
					Percent 0.0%

Matrix Notes: Human health or the environment will our could be exposed to pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$24,250

\$750

Violation Events

Number of Violation Events: 1 20 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$750

One single event is recommended.

Good Faith Efforts to Comply 10.0% Reduction \$75

	Before NOE/NOV	NOE/NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		x
N/A		

Notes: The Respondent achieved compliance by April 4, 2025.

Violation Subtotal \$675

Economic Benefit (EB) for this violation Statutory Limit Test

Estimated EB Amount \$2 **Violation Final Penalty Total** \$750

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

Economic Benefit Worksheet

Respondent Young Men's Christian Association of the Greater Houston Area
Case ID No. 67335
Reg. Ent. Reference No. RN101279412
Media Water Quality
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$150	15-Jan-2025	4-Apr-2025	0.22	\$2	n/a	\$2
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

Estimated training cost to update the Facility's operational guidance and conduct employee training to ensure that the grease trap is cleaned at least twice per month. The Date Required is the investigation date, and the Final Date is the compliance date.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$150

TOTAL

\$2

Screening Date	4-Feb-2025	Docket No.	2025-0207-MWD-E	PCW
Respondent	Young Men's Christian Association of the Greater Houston Area			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	67335			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN101279412			
Media	Water Quality			
Enf. Coordinator	Taylor Williamson			
Violation Number	4			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(b)			
Violation Description	Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative for a period of three years. Specifically, the reduced pressure backflow assembly ("RPBA") test records for 2022, 2023, and 2024 were not provided.			
		Base Penalty	\$25,000	

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				Percent 0.0%
Potential					

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
		x			Percent 10.0%

Matrix Notes: 100% of the rule requirements were not met.

Adjustment \$22,500

\$2,500

Violation Events

Number of Violation Events: 3 1095 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$7,500

Three single events are recommended, one for each missing record.

Good Faith Efforts to Comply 10.0% Reduction \$750

	Before NOE/NOV	NOE/NOV to EDRP/ Settlement Offer
Extraordinary		
Ordinary		x
N/A		

Notes: The Respondent achieved compliance by March 7, 2025.

Violation Subtotal \$6,750

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$3 **Violation Final Penalty Total** \$7,500

This violation Final Assessed Penalty (adjusted for limits) \$7,500

Economic Benefit Worksheet

Respondent Young Men's Christian Association of the Greater Houston Area
Case ID No. 67335
Reg. Ent. Reference No. RN101279412
Media Water Quality
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$500	15-Jan-2025	7-Mar-2025	0.14	\$3	n/a	\$3
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

Estimated training cost to update the Facility's operational guidance and conduct employee training to ensure that monitoring and reporting requirements are properly maintained, including RPBA test records, flow meter calibration records, and quality assurance/quality control records. The Date Required is the investigation date, and the Final Date is the compliance date.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$500

TOTAL

\$3

Screening Date 4-Feb-2025 **Docket No.** 2025-0207-MWD-E **PCW**
Respondent Young Men's Christian Association of the Greater Houston Area *Policy Revision 5 (January 28, 2021)*
Case ID No. 67335 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN101279412
Media Water Quality
Enf. Coordinator Taylor Williamson

Violation Number

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(b)

Violation Description Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative for a period of three years. Specifically, the effluent flow meter calibration record for 2022 was not provided.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0.0%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
	<input type="text"/>	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text" value="2.5%"/>

Matrix Notes Between 30% and 70% of the rule requirements were not met.

Adjustment

Violation Events

Number of Violation Events Number of violation days

daily	<input type="text"/>
weekly	<input type="text"/>
monthly	<input type="text"/>
quarterly	<input type="text"/>
semiannual	<input type="text"/>
annual	<input type="text"/>
single event	<input checked="" type="text" value="x"/>

Violation Base Penalty

One single event is recommended.

Good Faith Efforts to Comply Reduction

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

Extraordinary	<input type="text"/>	<input type="text"/>
Ordinary	<input type="text"/>	<input checked="" type="text" value="x"/>
N/A	<input type="text"/>	<input type="text"/>

Notes The Respondent achieved compliance by March 7, 2025.

Violation Subtotal

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Young Men's Christian Association of the Greater Houston Area
Case ID No. 67335
Reg. Ent. Reference No. RN101279412
Media Water Quality
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				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

See Economic Benefit Worksheet for Violation No. 4.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date 4-Feb-2025 **Docket No.** 2025-0207-MWD-E **PCW**
Respondent Young Men's Christian Association of the Greater Houston Area *Policy Revision 5 (January 28, 2021)*
Case ID No. 67335 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN101279412
Media Water Quality
Enf. Coordinator Taylor Williamson

Violation Number

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(c)(vi)

Violation Description Failed to maintain monitoring and reporting records at the Facility. Specifically, the April 9, 2024, effluent flow meter calibration records was missing quality assurance/quality control data such as the flow/staff gage readings before and after the calibration and the as found and as left total percent error of the secondary flow measuring device against the staff gage.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0.0%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="x"/>	<input type="text" value="1.0%"/>

Matrix Notes Less than 30% of the rule requirements were not met.

Adjustment

Violation Events

Number of Violation Events Number of violation days

daily	<input type="text"/>
weekly	<input type="text"/>
monthly	<input type="text"/>
quarterly	<input type="text"/>
semiannual	<input type="text"/>
annual	<input type="text"/>
single event	<input type="text" value="x"/>

Violation Base Penalty

One single event is recommended.

Good Faith Efforts to Comply Reduction

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary	<input type="text"/>	<input type="text"/>
Ordinary	<input type="text"/>	<input type="text" value="x"/>
N/A	<input type="text"/>	<input type="text"/>

Notes The Respondent achieved compliance by February 26, 2025.

Violation Subtotal

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Young Men's Christian Association of the Greater Houston Area
Case ID No. 67335
Reg. Ent. Reference No. RN101279412
Media Water Quality
Violation No. 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				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)	\$200	15-Jan-2025	26-Feb-2025	0.12	\$1	n/a	\$1

Notes for DELAYED costs
 Estimated cost for training is captured in Economic Benefit Worksheet for Violation No. 4.
 Estimated other cost to calibrate the effluent flow meter and submit a properly completed calibration report including the quality assurance/quality control data. The Date Required is the investigation date, and the Final Date is the compliance date.

Avoided Costs

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

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

Notes for AVOIDED costs
 (This area is currently blank for notes.)

Approx. Cost of Compliance \$200

TOTAL \$1

Screening Date	4-Feb-2025	Docket No.	2025-0207-MWD-E	PCW		
Respondent	Young Men's Christian Association of the Greater Houston Area				<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	67335				<i>PCW Revision February 11, 2021</i>	
Reg. Ent. Reference No.	RN101279412					
Media	Water Quality					
Enf. Coordinator	Taylor Williamson					
Violation Number	7					
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES No. WQ0011644001, Permit Conditions No. 2(g)					
Violation Description	Failed to prevent an unauthorized discharge of wastewater into or adjacent to any water in the State. Specifically, the Respondent had reported one 5-gallon unauthorized discharge on September 4, 2023, at the 460 Cullen Loop lift station caused by pump failure.					
		Base Penalty	\$25,000			
>> Environmental, Property and Human Health Matrix						
OR		Harm				
	Release	Major	Moderate	Minor		
	Actual			x		
Potential					Percent	15.0%
>> Programmatic Matrix						
	Falsification	Major	Moderate	Minor		
					Percent	0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.					
		Adjustment	\$21,250			
			\$3,750			
Violation Events						
	Number of Violation Events	1		1	Number of violation days	
		daily				
		weekly				
		monthly				
		quarterly	x			
		semiannual				
		annual				
		single event				
					Violation Base Penalty	\$3,750
	One quarterly event is recommended for the unauthorized discharge.					
Good Faith Efforts to Comply						
		25.0%			Reduction	\$937
		Before NOE/NOV NOE/NOV to EDRP/Settlement Offer				
	Extraordinary					
	Ordinary	x				
	N/A					
	Notes	The Respondent achieved compliance by September 4, 2023.				
					Violation Subtotal	\$2,813
Economic Benefit (EB) for this violation						
	Estimated EB Amount	\$0		Violation Final Penalty Total	\$3,188	
		This violation Final Assessed Penalty (adjusted for limits)				\$3,188

Economic Benefit Worksheet

Respondent Young Men's Christian Association of the Greater Houston Area
Case ID No. 67335
Reg. Ent. Reference No. RN101279412
Media Water Quality
Violation No. 7

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$1,000	4-Sep-2023	4-Sep-2023	0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to cease the discharge, remediate the area, and prevent future unauthorized discharges.
 The Date Required is the unauthorized discharge date, and the Final Date is the compliance date.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$1,000

TOTAL

\$0



Compliance History Report

Compliance History Report for CN601720626, RN101279412, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN601720626, Young Men's Christian Association of The Greater Houston Area
Classification: SATISFACTORY **Rating:** 0.80

Regulated Entity: RN101279412, YMCA CAMP CULLEN
Classification: SATISFACTORY **Rating:** 0.80

Complexity Points: 4 **Repeat Violator:** NO

CH Group: 08 - Sewage Treatment Facilities

Location: approximately 869 feet northeast of the intersection of Farm-to-Market Road 356 and Waltz Road, in Trinity County, Texas

TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

WASTEWATER PERMIT WQ0011644001

WASTEWATER EPA ID TX0059579

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

Date Compliance History Report Prepared: August 21, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: August 21, 2020 to August 21, 2025

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

Name: Taylor Williamson

Phone: (512) 239-2097

Site and Owner/Operator History:

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

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

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

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	September 15, 2020	(1687653)	Item 14	October 18, 2021	(1777561)
Item 2	October 16, 2020	(1693996)	Item 15	November 17, 2021	(1784360)
Item 3	November 17, 2020	(1714652)	Item 16	December 16, 2021	(1791390)
Item 4	December 15, 2020	(1714653)	Item 17	January 18, 2022	(1799172)
Item 5	January 19, 2021	(1714654)	Item 18	February 11, 2022	(1807050)
Item 6	February 16, 2021	(1727718)	Item 19	March 15, 2022	(1814114)
Item 7	March 17, 2021	(1727719)	Item 20	April 18, 2022	(1820688)
Item 8	April 20, 2021	(1727720)	Item 21	May 18, 2022	(1829523)
Item 9	May 19, 2021	(1741157)	Item 22	June 15, 2022	(1835817)
Item 10	June 18, 2021	(1747967)	Item 23	July 15, 2022	(1843018)
Item 11	July 20, 2021	(1752433)	Item 24	August 16, 2022	(1849147)
Item 12	August 18, 2021	(1757863)	Item 25	September 16, 2022	(1856947)
Item 13	September 18, 2021	(1767086)	Item 26	October 17, 2022	(1863305)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	
YOUNG MEN'S CHRISTIAN	§	TEXAS COMMISSION ON
ASSOCIATION OF THE GREATER	§	
HOUSTON AREA	§	
RN101279412	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2025-0207-MWD-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Young Men's Christian Association of the Greater Houston Area (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a wastewater treatment facility located at approximately 869 feet northeast of the intersection of Farm-to-Market Road 356 and Waltz Road in Trinity 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 \$17,076 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$13,661 of the penalty and \$3,415 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 September 4, 2023, ceased the discharge at the 460 Cullen Loop lift station, remediated the area, and repaired the pump to prevent future unauthorized discharges;
 - b. By January 17, 2025, performed cleaning and electrical maintenance to Pump Number 1 at the influent lift station and returned it to service;
 - c. By February 26, 2025, calibrated the effluent flow meter, including the quality assurance/quality control data on the report;
 - d. By March 7, 2025, submitted the reduced pressure backflow assembly ("RPBA") test record from February 16, 2024, a standard operating procedure ("SOP") for retention of the test records for three years, and a SOP for retention of flow meter calibration records for three years; and
 - e. By April 4, 2025, submitted a log sheet for monitoring the grease trap levels biweekly.

II. ALLEGATIONS

During an investigation at the Facility conducted on January 15, 2025, an investigator documented that the Respondent:

1. 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 Permit ("TPDES") No. WQ0011644001, Effluent Limitations and Monitoring Requirements No. 2. Specifically, a grab sample collected during the investigation revealed the Respondent exceeded the permitted limitation for chlorine residual of 4.0 milligrams per liter ("mg/L") with a result of 6.8 mg/L.
2. Failed to ensure the Facility and all of its systems of collection, treatment, and disposal are properly operated maintained, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and

- (5) and TPDES Permit No. WQ0011644001, Operational Requirements No. 1. Specifically, Pump Number 1 at the influent lift station was out of service.
3. Failed to clean the grease trap at least twice per month or at a higher frequency as required by the permit, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0011644001, Other Requirements No. 5. Specifically, the grease trap records indicated it was cleaned quarterly.
 4. Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative for a period of three years, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(b). Specifically, the RPBA test records for 2022, 2023, and 2024 were not provided.
 5. Failed to maintain monitoring and reporting records at the Facility and make them readily available for review by a TCEQ representative for a period of three years, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(b). Specifically, the effluent flow meter calibration record for 2022 was not provided.
 6. Failed to maintain monitoring and reporting records at the Facility, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (11)(B) and TPDES Permit No. WQ0011644001, Monitoring and Reporting Requirements No. 3(c)(vi). Specifically, the April 9, 2024, effluent flow meter calibration records was missing quality assurance/quality control data such as the flow/staff gage readings before and after the calibration and the as found and as left total percent error of the secondary flow measuring device against the staff gage.
 7. Failed to prevent an unauthorized discharge of wastewater into or adjacent to any water in the State, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and TPDES No. WQ0011644001, Permit Conditions No. 2(g). Specifically, the Respondent had reported one 5-gallon unauthorized discharge on September 4, 2023, at the 460 Cullen Loop lift station caused by pump failure.

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: Young Men's Christian Association of the Greater Houston Area, Docket No. 2025-0207-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, within 130 days after the effective date of this Order, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0011644001, including specific corrective actions that were implemented at the Facility to return to compliance, and copies of the most current self-reported discharge monitoring reports demonstrating at least three consecutive months of compliance all permitted effluent limitations. The written certification shall include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with the permitted effluent limitations. 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
Beaumont Regional Office
Texas Commission on Environmental Quality
3870 Eastex Freeway
Beaumont, Texas 77703-1830

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 Division 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.
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.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Krista Mello-Jurack

02/17/2026

For the Executive Director

Date

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

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

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG 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 OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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

Signature

Date

Gerald Galle

10/13/2025

Vp of Facilities

Name (Printed or typed)

Title

Authorized Representative of

Young Men's Christian Association of the Greater Houston Area

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

YMCA of Greater Houston
3110 HAYES ROAD. HOUSTON, TX 77082

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