

Executive Summary - Enforcement Matter - Case No. 67712

City of Laredo

RN100524099

Docket No. 2025-0566-PWS-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

PWS

Small Business:

No

Location(s) Where Violation(s) Occurred:

City of Laredo PWS, 2519 Jefferson Street, Laredo, Webb County

Type of Operation:

Public water supply

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Past-Due Fees: No

Other: N/A

Interested Third-Parties: The complainant has expressed an interest in this matter but does not wish to speak at Agenda.

Texas Register Publication Date: January 16, 2026

Comments Received: No

Penalty Information

Total Penalty Assessed: \$51,330

Amount Deferred for Expedited Settlement: \$10,266

Total Paid to General Revenue: \$0

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$41,064

Name of SEP: Sampling Station Installation (Compliance)

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - N/A

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): October 11, 2024

Complaint Information: Alleged that there were concerns with the water quality with the Respondent's PWS.

Date(s) of Investigation: October 11, 2024 through October 23, 2024

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

Executive Summary – Enforcement Matter – Case No. 67712

City of Laredo

RN100524099

Docket No. 2025-0566-PWS-E

Violation Information

1. Failed to maintain on file plans, specifications, maps, and other pertinent information to facilitate the operation and maintenance of the system's facilities and equipment. Specifically, hydraulic flow maps to identify the direction of flow throughout the distribution system were not available [30 TEX. ADMIN. CODE § 290.46(n)].

2. Failed to ensure additional protection was provided at all residences or establishments where an actual or potential contamination hazard exists in the form of an air gap or a backflow prevention assembly ("BPA"). Specifically, 65 locations were identified as needing additional protection during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice [30 TEX. ADMIN. CODE § 290.44(h)(1)(A)].

3. Failed to have all BPAs tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications. Specifically, 63 BPAs were identified as not having been tested annually during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice [30 TEX. ADMIN. CODE § 290.44(h)(4)].

4. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, multiple fire hydrants were observed to be uncapped, below grade, or leaking during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice [30 TEX. ADMIN. CODE § 290.46(m)].

5. Failed to provide make-up water supply lines to chemical feeder solution mixing chambers with an air gap or other acceptable backflow prevention device. Specifically, the air gap at the El Pico Plant chemical make-up water line was not at least twice the diameter of the water supply outlet. Additionally, the reduced pressure backflow assembly at the Jefferson Plant had a polyvinyl chloride funnel and discharge pipe affixed to the relief valve discharge that did not provide a sufficient air gap [30 TEX. ADMIN. CODE § 290.42(d)(2)(C)].

6. Failed to provide all potable water storage roof vents with approved screens fabricated of corrosion-resistant material, 16-mesh or finer, and securely clamped in place with stainless or galvanized bands or wires to prevent entry of animals, birds, insects and heavy air contaminants. Specifically, at the Jefferson Plant, Clearwell 1 had one vent without a screen and Clearwell 2 had six vents without screens. Additionally, at the El Pico Plant, the filtered water transfer well had a vent without a screen [30 TEX. ADMIN. CODE § 290.43(c)(1)].

Executive Summary - Enforcement Matter - Case No. 67712

City of Laredo

RN100524099

Docket No. 2025-0566-PWS-E

7. Failed to properly complete Surface Water Monthly Operating Reports ("SWMORs") submitted to the Commission. Specifically, during the El Pico Plant data audits, it was noted that the supervisory control and data acquisition ("SCADA") system lost communication with the individual filter effluent ("IFE") turbidimeters for Filters 6 and 9 from August 9, 2024 through September 5, 2024, and the highest hourly reading obtained by grab samples directly from the turbidimeter were reported on the SWMOR instead of reporting "No Data" given that the grab sampling surpassed the five working day limit for a system serving 10,000 people or more. Additionally, the lowest entry point chlorine residual reported was based on the lowest residual obtained from hourly grab samples instead of the lowest residual obtained from the continuous monitoring equipment [30 TEX. ADMIN. CODE § 290.111(h)].

8. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request. Specifically, records of the backflow prevention device programs were not maintained on-site for review [30 TEX. ADMIN. CODE § 290.46(f)(2) and (f)(3)(B)(v)].

9. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, at the Jefferson Plant, there was evidence of bird inhabitation under the roof vent of Clearwell 3, and the screen was loose on the overflow adjacent to Clearwell 3 [30 TEX. ADMIN. CODE § 290.46(m)].

10. Failed to ensure that if the continuous turbidity monitoring equipment malfunctions, the system conducts grab sampling every four hours in lieu of continuous monitoring, but for no more than five working days following the failure of the equipment. Specifically, at the El Pico Plant, the SCADA system lost communication with the IFE turbidimeters for Filters 6 and 9 from August 9, 2024 through September 5, 2024, and grab samples were collected for more than five working days in lieu of continuous monitoring [30 TEX. ADMIN. CODE § 290.111(e)(5)(C)(ii)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective actions:

a. By April 15, 2025:

i. Initiated maintenance and housekeeping practices to fix multiple fire hydrants that were observed to be uncapped, below grade, or leaking during cross-connection surveys;

ii. Provided the chemical make-up water line at the El Pico Plant with an air gap at least twice the diameter of the water supply outlet;

Executive Summary – Enforcement Matter – Case No. 67712

City of Laredo

RN100524099

Docket No. 2025-0566-PWS-E

iii. Provided screens for the vents on Clearwells 1 and 2 at the Jefferson Plant, and the filtered water transfer well vent at the El Pico Plant; and

iv. Initiated maintenance and housekeeping practices at the Jefferson Plant to remove evidence of bird inhabitation under the roof vent of Clearwell 3 and fixed the screen on the overflow adjacent to Clearwell 3.

b. By June 20, 2025:

i. Removed the polyvinyl chloride funnel and discharge pipe affixed to the relief valve discharge of the reduced pressure backflow assembly at the Jefferson Plant; and

ii. Ensured that if the continuous turbidity monitoring equipment malfunctions, the system conducts grab sampling every four hours in lieu of continuous monitoring, but for no more than five working days following the failure of the equipment.

c. By July 8, 2025, provided revised SWMORs for the months of August and September of 2024 for the El Pico Plant.

Technical Requirements:

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

2. The Order will also require the Respondent to:

a. Within 30 days:

i. Ensure that a proper BPA or air gap is provided at locations where an actual or potential contamination hazard exists, including but not limited to the 65 locations identified as needing additional protection;

ii. Update the Facility's operational guidance and conduct employee training to ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications; and

iii. Compile and maintain properly completed water works operation and maintenance records, including but not limited to records of the backflow prevention device programs.

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

c. Within 60 days:

Executive Summary - Enforcement Matter - Case No. 67712

City of Laredo

RN100524099

Docket No. 2025-0566-PWS-E

- i. Maintain on file plans, specifications, maps, and other pertinent information to facilitate the operation and maintenance of the system's facilities and equipment, including but not limited to hydraulic flow maps that identify the direction of flow throughout the distribution system; and
- ii. Ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certify that they are operating within specifications, including but not limited to the 63 BPAs identified as not having been tested annually.
- d. Within 105 days, submit written certification to demonstrate compliance with c.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Ryan Byer, Enforcement Division, Enforcement Team 4, MC 219, (512) 239-2571; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

TCEQ SEP Coordinator: Adena Crider, Litigation Division, MC 175, (512) 239-0648

Respondent: The Honorable Victor Trevino, Mayor, City of Laredo, 1110 Houston Street, Laredo, Texas 78040-8017

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	7-Apr-2025			
	PCW	8-Apr-2025	Screening	8-Apr-2025	EPA Due

RESPONDENT/FACILITY INFORMATION					
Respondent	City of Laredo				
Reg. Ent. Ref. No.	RN100524099				
Facility/Site Region	16-Laredo	Major/Minor Source	Major		

CASE INFORMATION					
Enf./Case ID No.	67712	No. of Violations	10		
Docket No.	2025-0566-PWS-E	Order Type	1660		
Media Program(s)	Public Water Supply	Government/Non-Profit	Yes		
Multi-Media		Enf. Coordinator	Ryan Byer		
		EC's Team	Enforcement Team 4		
Admin. Penalty \$ Limit Minimum	\$50	Maximum	\$5,000		

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$32,950
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	60.0%	Adjustment	Subtotals 2, 3, & 7	\$19,770
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Notes	Enhancement for three agreed orders containing a denial of liability.
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Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes	The Respondent does not meet the culpability criteria.
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Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$1,390
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$4,001	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$32,876	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$51,330
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes	
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Final Penalty Amount	\$51,330
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$51,330
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DEFERRAL	20.0%	Reduction	Adjustment	-\$10,266
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes	Deferral offered for expedited settlement.
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PAYABLE PENALTY	\$41,064
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Screening Date 8-Apr-2025

Docket No. 2025-0566-PWS-E

PCW

Respondent City of Laredo

Policy Revision 5 (January 28, 2021)

Case ID No. 67712

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN100524099

Media Public Water Supply

Enf. Coordinator Ryan Byer

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>)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	3	60%
	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) 60%

>> 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 three agreed orders containing a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 60%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 60%

Screening Date 8-Apr-2025
Respondent City of Laredo

Docket No. 2025-0566-PWS-E

PCW

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Case ID No. 67712
Reg. Ent. Reference No. RN100524099

Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number 1

Rule Cite(s)

30 Tex. Admin. Code § 290.46(n)

Violation Description

Failed to maintain on file plans, specifications, maps, and other pertinent information to facilitate the operation and maintenance of the system's facilities and equipment. Specifically, hydraulic flow maps to identify the direction of flow throughout the distribution system were not available.

Base Penalty \$5,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Harm		
	Major	Moderate	Minor
	x		

Percent 20.0%

Matrix Notes

100% of the rule requirements were not met.

Adjustment \$4,000

\$1,000

Violation Events

Number of Violation Events 1 179 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$1,000

One single 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 \$1,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$13

Violation Final Penalty Total \$1,600

This violation Final Assessed Penalty (adjusted for limits) \$1,600

Economic Benefit Worksheet

Respondent City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
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)	\$180	11-Oct-2024	5-Mar-2026	1.40	\$13	n/a	\$13

Notes for DELAYED costs

The delayed cost includes the estimated amount to maintain on file plans, specifications, maps, and other pertinent information to facilitate the operation and maintenance of the system's facilities and equipment, including but not limited to a flow map, calculated from the date of the investigation to the estimated date of compliance.

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 \$180

TOTAL \$13

Screening Date 8-Apr-2025 **Docket No.** 2025-0566-PWS-E **PCW**
Respondent City of Laredo *Policy Revision 5 (January 28, 2021)*
Case ID No. 67712 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number

Rule Cite(s)

Violation Description

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"/>	<input type="text" value="30.0%"/>
Potential	<input type="text" value="x"/>	<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"/>	<input type="text" value="0.0%"/>

Matrix Notes

Adjustment

Violation Events

Number of Violation Events Number of violation days

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

Violation Base Penalty

Good Faith Efforts to Comply Reduction

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

Notes

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 City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
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	\$13,000	11-Oct-2024	3-Feb-2026	1.32	\$57	\$1,140	\$1,197
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost includes the estimated amount to ensure additional protection is provided in the form of an air gap or BPA determined by the specific potential hazard, calculated from the date of the investigation to the estimated date of compliance.

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

\$13,000

TOTAL

\$1,197

Screening Date 8-Apr-2025 **Docket No.** 2025-0566-PWS-E **PCW**
Respondent City of Laredo *Policy Revision 5 (January 28, 2021)*
Case ID No. 67712 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number 3
Rule Cite(s) 30 Tex. Admin. Code § 290.44(h)(4)
Violation Description Failed to have all BPAs tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications. Specifically, 63 BPAs were identified as not having been tested annually during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice.

Base Penalty \$5,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				30.0%
	Potential	x			

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes Failure to test BPAs on an annual basis would not ensure the device is operating properly which could result in a reverse flow of contaminants entering the water into mains which would exceed levels protective of human health.

Adjustment \$3,500

\$1,500

Violation Events

Number of Violation Events 6 179 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$9,000

Six monthly events are recommended, calculated from the date of the investigation, October 11, 2024, to the date of screening, April 8, 2025.

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 \$9,000

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

Estimated EB Amount \$2,235 **Violation Final Penalty Total** \$14,400

This violation Final Assessed Penalty (adjusted for limits) \$14,400

Economic Benefit Worksheet

Respondent City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
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	\$1,500	11-Oct-2024	3-Feb-2026	1.32	\$99	n/a	\$99
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$1,953	11-Oct-2024	5-Mar-2026	1.40	\$136	n/a	\$136

Notes for DELAYED costs

The Training/Sampling delayed cost includes the estimated amount to update the Facility's operational guidance and conduct employee training to ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications, calculated from the date of the investigation to the estimated date of compliance.

The Other delayed cost includes the estimated amount to test the 63 BPAs (\$31 per BPA x 63 locations), calculated from the date of the investigation to the estimated date of compliance.

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	\$1,953	11-Oct-2024	8-Apr-2025	0.49	\$47	\$1,953	\$2,000
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

The avoided cost includes the estimated amount to test the 63 BPAs (\$31 per BPA x 63 locations), calculated from the date of the investigation to the date of screening.

Approx. Cost of Compliance

\$5,406

TOTAL

\$2,235

Screening Date 8-Apr-2025 **Docket No.** 2025-0566-PWS-E **PCW**
Respondent City of Laredo *Policy Revision 5 (January 28, 2021)*
Case ID No. 67712 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number 4
Rule Cite(s) 30 Tex. Admin. Code § 290.46(m)
Violation Description Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, multiple fire hydrants were observed to be uncapped, below grade, or leaking during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice.

Base Penalty \$5,000

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				15.0%
Potential		x		

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
				0.0%

Matrix Notes Failure to maintain the good working condition and general appearance of the Facility could expose persons served by the Facility to a significant amount of contaminants which would not exceed levels protective of human health.

Adjustment \$4,250

\$750

Violation Events

Number of Violation Events 2 179 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$1,500

Two quarterly events are recommended, calculated from the date of the investigation, October 11, 2024, to the date of screening, April 8, 2025.

Good Faith Efforts to Comply 10.0% Reduction \$150

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

Notes The Respondent achieved compliance by April 15, 2025.

Violation Subtotal \$1,350

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

Estimated EB Amount \$357 **Violation Final Penalty Total** \$2,250

This violation Final Assessed Penalty (adjusted for limits) \$2,250

Economic Benefit Worksheet

Respondent City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
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
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$10,000	11-Oct-2024	15-Apr-2025	0.51	\$17	\$340	\$357
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost includes the estimated amount to repair or replace the fire hydrants that are uncapped, below grade, or leaking, calculated from the date of the investigation to the date of compliance.

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

\$10,000

TOTAL

\$357

Screening Date 8-Apr-2025 **Docket No.** 2025-0566-PWS-E **PCW**
Respondent City of Laredo *Policy Revision 5 (January 28, 2021)*
Case ID No. 67712 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number

Rule Cite(s)

Violation Description
 Failed to provide make-up water supply lines to chemical feeder solution mixing chambers with an air gap or other acceptable backflow prevention device. Specifically, the air gap at the El Pico Plant chemical make-up water line was not at least twice the diameter of the water supply outlet. Additionally, the reduced pressure backflow assembly at the Jefferson Plant had a polyvinyl chloride funnel and discharge pipe affixed to the relief valve discharge that did not provide a sufficient air gap.

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="30.0%"/>
	Potential	<input type="text" value="x"/>	<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"/>	<input type="text" value="0.0%"/>

Matrix Notes
 Failure to provide make-up water supply lines to chemical feeder solution mixing chambers with an air gap or other acceptable backflow prevention device could result in persons served by the Facility being exposed to contaminants which would exceed levels protective of human health.

Adjustment

Violation Events

Number of Violation Events Number of violation days

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

Violation Base Penalty

Six monthly events are recommended, calculated from the date of the investigation, October 11, 2024, to the date of screening, April 8, 2025.

Good Faith Efforts to Comply Reduction

	Before NOE/NOV	NOE/NOV to EDRP/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 on June 20, 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 City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
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
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment	\$2,000	11-Oct-2024	20-Jun-2025	0.69	\$5	\$92	\$97
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost includes the estimated amount to provide the chemical make-up water line at the El Pico Plant and the reduced pressure backflow assembly at the Jefferson Plant with an appropriate air gap or other acceptable backflow prevention device, calculated from the date of the investigation to the date of compliance.

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

\$2,000

TOTAL

\$97

Screening Date 8-Apr-2025	Docket No. 2025-0566-PWS-E	PCW
Respondent City of Laredo		<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No. 67712		<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No. RN100524099		
Media Public Water Supply		
Enf. Coordinator Ryan Byer		

Violation Number

Rule Cite(s)

Violation Description

Failed to provide all potable water storage roof vents with approved screens fabricated of corrosion-resistant material, 16-mesh or finer, and securely clamped in place with stainless or galvanized bands or wires to prevent entry of animals, birds, insects and heavy air contaminants. Specifically, at the Jefferson Plant, Clearwell 1 had one vent without a screen and Clearwell 2 had six vents without screens. Additionally, at the El Pico Plant, the filtered water transfer well had a vent without a screen.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Harm			
	Release	Major	Moderate	Minor
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>
Potential	<input type="text"/>	x	<input type="text"/>	Percent <input type="text" value="15.0%"/>

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="0.0%"/>

Matrix Notes

Failure to provide a screen for the potable water storage roof vents could result in persons served by the Facility being exposed to a significant amount of contaminants which would not exceed levels protective of human health.

Adjustment

Violation Events

Number of Violation Events Number of violation days

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

Violation Base Penalty

Two quarterly events are recommended, calculated from the date of the investigation, October 11, 2024, to the date of screening, April 8, 2025.

Good Faith Efforts to Comply Reduction

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

Notes

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 City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
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
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$200	11-Oct-2024	15-Apr-2025	0.51	\$0	\$7	\$7
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost includes the estimated amount to provide corrosion-resistant 16-mesh or finer screen for the vents on Clearwells 1 and 2 at the Jefferson Plant and the filtered water transfer well at the El Pico Plant (\$25 per vent x eight vents), calculated from the date of the investigation to the date of compliance.

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

\$200

TOTAL

\$7

Screening Date 8-Apr-2025 **Docket No.** 2025-0566-PWS-E **PCW**
Respondent City of Laredo *Policy Revision 5 (January 28, 2021)*
Case ID No. 67712 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number

Rule Cite(s)

Violation Description

Failed to properly complete Surface Water Monthly Operating Reports ("SWMORs") submitted to the Commission. Specifically, during the El Pico Plant data audits, it was noted that the supervisory control and data acquisition ("SCADA") system lost communication with the individual filter effluent ("IFE") turbidimeters for Filters 6 and 9 from August 9, 2024 through September 5, 2024, and the highest hourly reading obtained by grab samples directly from the turbidimeter were reported on the SWMOR instead of reporting "No Data" given that the grab sampling surpassed the five working day limit for a system serving 10,000 people or more. Additionally, the lowest entry point chlorine residual reported was based on the lowest residual obtained from hourly grab samples instead of the lowest residual obtained from the continuous monitoring equipment.

Base Penalty

>> Environmental, Property and Human Health Matrix

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

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

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

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 City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
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	\$45	11-Oct-2024	8-Jul-2025	0.74	\$2	n/a	\$2
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost includes the estimated amount to submit properly completed SWMORs for the months of August and September 2024 to the Commission, calculated from the date of the investigation to the date of compliance.

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 \$45

TOTAL \$2

Screening Date 8-Apr-2025 **Docket No.** 2025-0566-PWS-E **PCW**
Respondent City of Laredo *Policy Revision 5 (January 28, 2021)*
Case ID No. 67712 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number 8
Rule Cite(s) 30 Tex. Admin. Code § 290.46(f)(2) and (f)(3)(B)(v)
Violation Description Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request. Specifically, records of the backflow prevention device programs were not maintained on-site for review.

Base Penalty \$5,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				0.0%
	Potential				

>> Programmatic Matrix

Matrix Notes	Falsification	Harm			Percent
		Major	Moderate	Minor	
				x	1.0%
Less than 30% of the rule requirements were not met.					

Adjustment \$4,950

\$50

Violation Events

Number of Violation Events 1 179 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$50

One single event is recommended.

Good Faith Efforts to Comply 0.0% Reduction \$0

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

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$50

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

Estimated EB Amount \$3 **Violation Final Penalty Total** \$80

This violation Final Assessed Penalty (adjusted for limits) \$80

Economic Benefit Worksheet

Respondent City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Violation No. 8

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	\$45	11-Oct-2024	3-Feb-2026	1.32	\$3	n/a	\$3
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost includes the estimated amount to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request, calculated from the date of the investigation to the estimated date of compliance.

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

\$45

TOTAL

\$3

Screening Date 8-Apr-2025 **Docket No.** 2025-0566-PWS-E **PCW**
Respondent City of Laredo *Policy Revision 5 (January 28, 2021)*
Case ID No. 67712 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Enf. Coordinator Ryan Byer

Violation Number

Rule Cite(s)

Violation Description Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, at the Jefferson Plant, there was evidence of bird inhabitation under the roof vent of Clearwell 3, and the screen was loose on the overflow adjacent to Clearwell 3.

Base Penalty

>> **Environmental, Property and Human Health Matrix**

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

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	Percent
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0.0%"/>

Matrix Notes Failure to maintain the good working condition and general appearance of the Facility could expose persons served by the Facility to an insignificant amount of contaminants which would not exceed levels protective of human health.

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

Good Faith Efforts to Comply Reduction

	Before NOE/NOV	NOE/NOV to EDRP/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 April 15, 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 City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Violation No. 9

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)	\$500	11-Oct-2024	15-Apr-2025	0.51	\$1	\$17	\$18
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
<p>Notes for DELAYED costs</p> <p>The delayed cost includes the estimated amount to remove evidence of bird inhabitation under the roof vent of Clearwell 3, and secure the loose screen on the overflow adjacent to Clearwell 3, calculated from the date of the investigation to the date of compliance.</p>							

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
<p>Notes for AVOIDED costs</p>							

Approx. Cost of Compliance \$500

TOTAL \$18

Screening Date	8-Apr-2025	Docket No.	2025-0566-PWS-E	PCW
Respondent	City of Laredo			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	67712			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN100524099			
Media	Public Water Supply			
Enf. Coordinator	Ryan Byer			

Violation Number

Rule Cite(s)

Violation Description

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="15.0%"/>
	Potential	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0.0%"/>

Matrix Notes

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 checked="" type="text" value="x"/>
semiannual	<input type="text"/>
annual	<input type="text"/>
single event	<input type="text"/>

Violation Base Penalty

Good Faith Efforts to Comply Reduction

	Before NOE/NOV	NOE/NOV to EDRP/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

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 City of Laredo
Case ID No. 67712
Reg. Ent. Reference No. RN100524099
Media Public Water Supply
Violation No. 10

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)	\$1,500	11-Oct-2024	20-Jun-2025	0.69	\$3	\$69	\$72
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to ensure continuous turbidity monitoring equipment is used to monitor the IFE turbidity and cease conducting grab sampling in lieu of continuous monitoring, calculated from the date of the investigation to the date of compliance.						

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 \$1,500

TOTAL \$72



Compliance History Report

Compliance History Report for CN600131908, RN100524099, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator:	CN600131908, City of Laredo	Classification:	SATISFACTORY	Rating:	0.73
Regulated Entity:	RN100524099, CITY OF LAREDO	Classification:	NOT APPLICABLE	Rating:	0.00
Complexity Points:	0	Repeat Violator:	NO		
CH Group:	14 - Other				
Location:	2519 JEFFERSON STREET IN LAREDO, WEBB COUNTY, TEXAS				
TCEQ Region:	REGION 16 - LAREDO				
ID Number(s):	PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 2400001				

Compliance History Period:	September 01, 2019 to August 31, 2024	Rating Year:	2024	Rating Date:	09/01/2024
Date Compliance History Report Prepared:	August 29, 2025				
Agency Decision Requiring Compliance History:	Enforcement				
Component Period Selected:	August 29, 2020 to August 29, 2025				
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.					
Name:	Ryan Byer			Phone:	(512) 239-2571

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:

- 1 Effective Date: 07/07/2021 ADMINORDER 2019-1661-PWS-E (1660 Order-Agreed Order With Denial)
 Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)
 Description: Failure to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, the Lyons South Ground Storage Tank was in poor condition and was leaking in several areas on the wall of the tank.
 Classification: Major
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(q)(1)
 Description: Failure to issue a boil water notice to customers of the Facility within 24 hours of a low disinfectant residual using the prescribed format as specified in 30 TEX. ADMIN. CODE § 290.47(c). Specifically, a low disinfectant residual was documented on September 19, 2019. The Executive Director required the Respondent to issue a boil water notice by September 21, 2019, however the notice was not issued until September 28, 2019.

- 2 Effective Date: 11/02/2021 ADMINORDER 2021-0293-PWS-E (1660 Order-Agreed Order With Denial)
 Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(B)
 30 TAC Chapter 290, SubChapter F 290.110(b)(4)
 5A THSC Chapter 341, SubChapter A 341.0315(c)
 Description: Failure to maintain a disinfectant residual of at least 0.5 milligram per liter ("mg/L") of total chlorine throughout the distribution system and in each finished water storage tank at all times. Specifically, between June 26, 2020 through December 8, 2020, multiple instances of disinfectant residuals below 0.5 mg/L were documented in the distribution system and finished water storage tanks.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.39(j)
5A THSC Chapter 341, SubChapter A 341.0351

Description: Failure to notify the Executive Director prior to making any significant change or addition to the system's production, treatment, storage, pressure maintenance, or distribution facilities. Specifically, the Respondent did not notify the Executive Director prior to the installation of one raw water pump rated at 15 MGD and three manually operated diesel powered pumps rated at 4 MGD each at the El Pico water plant, resulting in raw water production capacity being reduced from 45 MGD to 27 MGD.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.45(b)(2)(A)
5A THSC Chapter 341, SubChapter A 341.0351

Description: Failure to provide a raw water pump capacity of 0.6 gpm per connection with the largest pump out of service. Specifically, the Facility had 17,115 connections in the El Pico pressure plane requiring a raw water pump capacity of 10,269 gpm. However, only 8,334 gpm with the largest pump out of service is provided, indicating a 19% deficiency.

3 Effective Date: 08/22/2023 ADMINORDER 2021-1455-PWS-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.111(h)

Description: Failure to properly complete the Surface Water Monthly Operating Reports ("SWMORs") submitted to the Commission.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(s)(2)(B)(iv)

Description: Failure to check the calibration of the Facility's on-line turbidimeters with a primary standard, a secondary standard, or the manufacturer's proprietary calibration confirmation device or by comparing the results from the on-line unit with the results from a properly calibrated benchtop unit at least once every week. Specifically, the calibration of the 11 on-line turbidimeters at the El Pico SWTP and the 13 on-line turbidimeters at the Jefferson SWTP were not being checked once each week.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(ii)

Description: Failure to verify the accuracy of the Facility's continuous disinfectant analyzer at least once every seven days with a chlorine solution of known concentration or by comparing the results from the on-line analyzer with the results of an approved benchtop method. Specifically, the analyzer at both the El Pico SWTP and Jefferson SWTP were not being verified.

Classification: Major

Citation: 30 TAC Chapter 290, SubChapter D 290.45(b)(2)(F)
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: Failure to provide a service pump capacity that provides each pump station or pressure plane with two or more pumps that have a total capacity of 2.0 gpm per connection or that have a total capacity of at least 1,000 gpm and the ability to meet peak hourly demands with the largest pump out of service, whichever is less. However, only 2,100 gpm of service pump capacity was provided, indicating a 62% deficiency. Additionally, the 627' Elevation pressure plane had 49,019 connections requiring a s

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.111(e)(5)(E)(i)

Description: Failure to ensure turbidity equipment and all associated recording devices read and record levels at least 10% higher than the turbidity level needed to determine compliance with the highest applicable regulatory requirement. Specifically, the 11 on-line turbidimeters at the El Pico SWTP and 13 on-line turbidimeters at the Jefferson SWTP could not read and record levels at least 10% higher than the turbidity level needed to determine compliance.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	August 31, 2020	(1663532)
Item 3	November 05, 2020	(1685113)
Item 4	November 17, 2020	(1684109)
Item 5	November 19, 2020	(1685853)

Item 6	December 03, 2020	(1685283)
Item 9	March 01, 2021	(1702042)
Item 10	March 17, 2021	(1704750)
Item 14	November 05, 2021	(1764625)
Item 16	November 17, 2021	(1764289)
Item 17	November 19, 2021	(1771538)
Item 18	November 28, 2021	(1774524)
Item 21	December 21, 2021	(1781385)
Item 22	February 25, 2022	(1794522)
Item 23	March 09, 2022	(1796620)
Item 24	March 16, 2022	(1797706)
Item 25	March 22, 2022	(1802294)
Item 26	March 23, 2022	(1802372)
Item 27	March 29, 2022	(1797405)
Item 30	June 08, 2022	(1805118)
Item 31	June 26, 2022	(1823725)
Item 33	September 23, 2022	(1839261)
Item 34	October 31, 2022	(1848286)
Item 36	November 03, 2022	(1841849)
Item 37	December 21, 2022	(1861755)
Item 38	February 03, 2023	(1861459)
Item 39	March 16, 2023	(1881877)
Item 47	March 12, 2025	(2041195)

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):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Appendix B

All Investigations Conducted During Component Period August 29, 2020 and August 29, 2025

Item 1*	August 31, 2020**	(1663532)
Item 2*	November 05, 2020**	(1685113)
Item 3*	November 17, 2020**	(1684109)
Item 4*	November 19, 2020**	(1685853)
Item 5*	December 03, 2020**	(1685283)
Item 6	February 03, 2021**	(1699530)
Item 7*	March 01, 2021**	(1702042)
Item 8*	March 17, 2021**	(1704750)
Item 9*	November 05, 2021**	(1764625)
Item 10*	November 15, 2021**	(1761727)
Item 11*	November 17, 2021**	(1764289)
Item 12*	November 19, 2021**	(1771538)
Item 13*	November 28, 2021**	(1774524)
Item 14*	December 21, 2021**	(1781385)
Item 15*	February 25, 2022**	(1794522)
Item 16*	March 09, 2022**	(1796620)
Item 17*	March 16, 2022**	(1797706)
Item 18*	March 22, 2022**	(1802294)
Item 19*	March 23, 2022**	(1802372)
Item 20*	March 29, 2022**	(1797405)
Item 21*	June 08, 2022**	(1805118)
Item 22*	June 26, 2022**	(1823725)
Item 23	August 30, 2022**	(1834121)
Item 24*	September 23, 2022**	(1839261)
Item 25*	October 31, 2022**	(1848286)
Item 26*	November 03, 2022**	(1841849)
Item 27*	December 21, 2022**	(1861755)
Item 28*	February 03, 2023**	(1861459)
Item 29*	March 16, 2023**	(1881877)
Item 30*	August 28, 2023**	(1923679)
Item 31	March 26, 2024**	(1967697)
Item 32*	March 12, 2025	(2041195)
Item 33*	August 21, 2025	(2084860)

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2019 and 08/31/2024.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CITY OF LAREDO
RN100524099

§ BEFORE THE
§ TEXAS COMMISSION ON
§ ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2025-0566-PWS-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Laredo (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a public water supply located at 2519 Jefferson Street in Laredo, Webb County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 88,747 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(73).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE § 7.002 and TEX. HEALTH & SAFETY CODE § 341.049, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 and TEX. HEALTH & SAFETY CODE § 341.031 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 341 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 \$51,330 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The amount of \$10,266 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions of this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms and conditions contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

Pursuant to TEX. WATER CODE § 7.067, \$41,064 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms

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

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that the Respondent implemented the following corrective actions at the Facility:
 - a. By April 15, 2025:
 - i. Initiated maintenance and housekeeping practices to fix multiple fire hydrants that were observed to be uncapped, below grade, or leaking during cross-connection surveys;
 - ii. Provided the chemical make-up water line at the El Pico Plant with an air gap at least twice the diameter of the water supply outlet;
 - iii. Provided screens for the vents on Clearwells 1 and 2 at the Jefferson Plant, and the filtered water transfer well vent at the El Pico Plant; and
 - iv. Initiated maintenance and housekeeping practices at the Jefferson Plant to remove evidence of bird inhabitation under the roof vent of Clearwell 3 and fixed the screen on the overflow adjacent to Clearwell 3.
 - b. By June 20, 2025:
 - i. Removed the polyvinyl chloride funnel and discharge pipe affixed to the relief valve discharge of the reduced pressure backflow assembly at the Jefferson Plant; and
 - ii. Ensured that if the continuous turbidity monitoring equipment malfunctions, the system conducts grab sampling every four hours in lieu of continuous monitoring, but for no more than five working days following the failure of the equipment.

- c. By July 8, 2025, provided revised Surface Water Monthly Operating Reports ("SWMORs") for the months of August and September of 2024 for the El Pico Plant.

II. ALLEGATIONS

During an investigation at the Facility conducted on October 11, 2024 through October 23, 2024, an investigator documented that the Respondent:

1. Failed to maintain on file plans, specifications, maps, and other pertinent information to facilitate the operation and maintenance of the system's facilities and equipment, in violation of 30 TEX. ADMIN. CODE § 290.46(n). Specifically, hydraulic flow maps to identify the direction of flow throughout the distribution system were not available.
2. Failed to ensure additional protection was provided at all residences or establishments where an actual or potential contamination hazard exists in the form of an air gap or a backflow prevention assembly ("BPA"), as identified in 30 TEX. ADMIN. CODE § 290.47(f), in violation of 30 TEX. ADMIN. CODE § 290.44(h)(1)(A). Specifically, 65 locations were identified as needing additional protection during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice.
3. Failed to have all BPAs tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications, in violation of 30 TEX. ADMIN. CODE § 290.44(h)(4). Specifically, 63 BPAs were identified as not having been tested annually during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice.
4. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, in violation of 30 TEX. ADMIN. CODE § 290.46(m). Specifically, multiple fire hydrants were observed to be uncapped, below grade, or leaking during cross-connection surveys conducted by state agencies during emergency response operations on October 12, 2024 through October 22, 2024, for a system-wide boil water notice.
5. Failed to provide make-up water supply lines to chemical feeder solution mixing chambers with an air gap or other acceptable backflow prevention device, in violation of 30 TEX. ADMIN. CODE § 290.42(d)(2)(C). Specifically, the air gap at the El Pico Plant chemical make-up water line was not at least twice the diameter of the water supply outlet. Additionally, the reduced pressure backflow assembly at the Jefferson Plant had a polyvinyl chloride funnel and discharge pipe affixed to the relief valve discharge that did not provide a sufficient air gap.
6. Failed to provide all potable water storage roof vents with approved screens fabricated of corrosion-resistant material, 16-mesh or finer, and securely clamped in place with stainless or galvanized bands or wires to prevent entry of animals, birds, insects and heavy air contaminants, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(1). Specifically, at the Jefferson Plant, Clearwell 1 had one vent without a screen and Clearwell 2 had six vents without screens. Additionally, at the El Pico Plant, the filtered water transfer well had a vent without a screen.

7. Failed to properly complete SWMORs submitted to the Commission, in violation of 30 TEX. ADMIN. CODE § 290.111(h). Specifically, during the El Pico Plant data audits, it was noted that the supervisory control and data acquisition ("SCADA") system lost communication with the individual filter effluent ("IFE") turbidimeters for Filters 6 and 9 from August 9, 2024 through September 5, 2024, and the highest hourly reading obtained by grab samples directly from the turbidimeter were reported on the SWMOR instead of reporting "No Data" given that the grab sampling surpassed the five working day limit for a system serving 10,000 people or more. Additionally, the lowest entry point chlorine residual reported was based on the lowest residual obtained from hourly grab samples instead of the lowest residual obtained from the continuous monitoring equipment.
8. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request, in violation of 30 TEX. ADMIN. CODE § 290.46(f)(2) and (f)(3)(B)(v). Specifically, records of the backflow prevention device programs were not maintained on-site for review.
9. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, in violation of 30 TEX. ADMIN. CODE § 290.46(m). Specifically, at the Jefferson Plant, there was evidence of bird inhabitation under the roof vent of Clearwell 3, and the screen was loose on the overflow adjacent to Clearwell 3.
10. Failed to ensure that if the continuous turbidity monitoring equipment malfunctions, the system conducts grab sampling every four hours in lieu of continuous monitoring, but for no more than five working days following the failure of the equipment, in violation of 30 TEX. ADMIN. CODE § 290.111(e)(5)(C)(ii). Specifically, at the El Pico Plant, the SCADA system lost communication with the IFE turbidimeters for Filters 6 and 9 from August 9, 2024 through September 5, 2024, and grab samples were collected for more than five working days in lieu of continuous monitoring.

III. DENIALS

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

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Laredo, Docket No. 2025-0566-PWS-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 implement and complete the SEP as set forth in Section I, Paragraph No. 4. The amount of \$41,064 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
3. The Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Ensure that a proper BPA or air gap is provided at locations where an actual or potential contamination hazard exists, including but not limited to the 65 locations identified as needing additional protection, in accordance with 30 TEX. ADMIN. CODE § 290.44;
 - ii. Update the Facility's operational guidance and conduct employee training to ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications, in accordance with 30 TEX. ADMIN. CODE § 290.44; and
 - iii. Compile and maintain properly completed water works operation and maintenance records, including but not limited to records of the backflow prevention device programs, in accordance with 30 TEX. ADMIN. CODE § 290.46.
 - b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.d below, 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.iii.
 - c. Within 60 days after the effective date of this Order:
 - i. Maintain on file plans, specifications, maps, and other pertinent information to facilitate the operation and maintenance of the system's facilities and equipment, including but not limited to hydraulic flow maps that identify the direction of flow throughout the distribution system, in violation of 30 TEX. ADMIN. CODE § 290.46; and
 - ii. Ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certify that they are operating within specifications, including but not limited to the 63 BPAs identified as not having been tested annually, in accordance with 30 TEX. ADMIN. CODE § 290.44.

- d. Within 105 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.c.i and 3.c.ii. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

Water Section Manager
Laredo Regional Office
Texas Commission on Environmental Quality
707 East Calton Road, Suite 304
Laredo, Texas 78041-3887

4. All relief not expressly granted in this Order is denied.
5. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
6. 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.
7. 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.
8. 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.

9. 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

Kristi Mallo-Jurack

02/27/2026

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] JAR

Signature

Date

12.5.25

Dr. Victor Treviño

Mayor

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

Title

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



Attest *[Signature]*
Mario I. Maldonado Jr.
City Secretary

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.

Attachment A

Docket Number: 2025-0566-PWS-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	City of Laredo
Penalty Amount:	\$41,064
SEP Offset Amount:	\$41,064
Type of SEP:	Compliance
Project Name:	<i>Sampling Station Installation</i>
Location of SEP:	Webb County

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

Respondent is a Local Government that qualifies under Texas Water Code § 7.067 to apply the SEP Offset Amount set forth above to correct violations at its public water supply (the “Facility”) which are described in this Agreed Order. This Agreed Order cites violations at Respondent’s Facility.

1. Project Description

A. Project

Respondent shall hire a contractor to purchase and install dedicated bacteriological sampling stations at approximately 165 sampling locations throughout the Facility’s distribution system. Specifically, the SEP Offset Amount shall be used for materials, supplies, and equipment for the sampling stations (the “Project”). Respondent shall solicit bids from qualified contractors to perform the Project. Any advertisement or invitation for bids, including publication, related to the SEP must include the enforcement statement as stated below in Section 6, Publicity. The SEP will be performed in accordance with all federal, state, and local environmental laws and regulations, including permits that may be required prior to commencement of the SEP. The Commission’s approval and issuance of this Agreed Order shall not itself be construed to authorize any activity for which Respondent is required by statute or rule to obtain authorization from the Commission.

Respondent shall use the SEP Offset Amount only for the direct cost of implementing the Project, including supplies, materials, and equipment rentals, as listed below in Subsection C. Minimum Expenditure, Estimated Cost Schedule. No portion of the SEP Offset Amount shall be spent on administrative costs, including operating costs, reporting expenses, handling of expenses, project coordination, liability, or equipment breakdowns.

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

B. Environmental Benefit

This SEP will enhance the accuracy and consistency of water quality monitoring throughout the Facility. By improving access to designated sampling points, it will help identify potential contamination more quickly and ensure that corrective actions can be taken. Designated stations provide controlled and representative sampling points, ensuring significantly greater

accuracy than non-designated sampling locations. This ensures continued access to safe drinking water for the community.

C. Minimum Expenditure

Respondent shall spend at least the SEP Offset Amount to complete the project described above in Section 1.A and comply with all other provisions of this SEP. Respondent understands that it may cost more than the SEP Offset Amount to complete the Project. Costs in excess of the SEP Offset Amount shall not be grounds to relieve Respondent of its obligations to perform this SEP.

Estimated Cost Schedule

Item	Cost	Quantity	Total
Residential Sampling Stations	\$693.60	115	\$79,764
Commercial Sampling Stations	\$1,448.00	50	\$72,400
Station Installation	\$125.00	165	\$20,625
Total			\$172,789

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, Respondent shall begin implementation of the SEP. Respondent shall have completed the SEP in its entirety within 105 days after the effective date of this Agreed Order.

Executive Director (“ED”) staff may grant an extension to any deadline for Respondent’s performance of the SEP described herein, upon a written and substantiated showing of good cause. All requests for extensions must be made by Respondent and shall be made in writing to ED staff. Extensions are not effective until Respondent receives written approval from ED staff. The determination of what constitutes good cause rests solely with ED staff. Extension requests shall be sent to the SEP Coordinator by first class mail or electronic mail, at:

Texas Commission on Environmental Quality
Litigation Division
Attention: SEP Coordinator, MC 175
P.O. Box 13087
Austin, Texas 78711-3087
Email: sepreports@tceq.texas.gov

3. Records and Reporting

A. Progress Report

Within 30 days after the effective date of this Agreed Order, Respondent shall submit a Notice of Commencement to TCEQ describing actions performed to date to implement the Project. Within 90 days after the effective date of this Agreed Order, Respondent shall submit a report detailing the progress made and all actions completed on the Project during the previous 60-day period and setting forth a schedule for achieving completion of the Project within the 105-day timeframe set forth above in Section 2, Performance Schedule.

Reporting Schedule

Days from Effective Order Date	Information Required
30	Notice of Commencement describing actions taken to begin project
90	Actions completed during the previous 60-day period
105	Notice of SEP completion

B. Final Report

Within 105 days after the effective date of the Agreed Order, or within 30 days after completion of the SEP, whichever is earlier, Respondent shall submit a Final Report to TCEQ, which shall include the following:

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

C. Submittals

Respondent shall submit all SEP reports and any additional information as requested to the SEP Coordinator at the address provided above.

4. Additional Information and Access

Respondent shall provide additional information as requested by TCEQ staff and shall allow access to all records related to the SEP Offset Amount. Respondent shall also allow representatives of TCEQ access to the site of any work being financed in whole or in part by the SEP Offset Amount. This provision shall survive the termination of this Agreed Order.

5. Failure to Fully Perform

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

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

the check payable to “Texas Commission on Environmental Quality,” and shall mail it to the SEP Coordinator at the address provided above.

6. Publicity

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

7. Recognition

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

8. Other SEPs by TCEQ or Other Agencies

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