Executive Summary – Enforcement Matter – Case No. 68387
City of Holliday
RN101609519
Docket No. 2025-1770-MWD-E

Order Type:
1660
Findings Order Justification:
N/A
Media:
MWD
Small Business:
No
Location(s) Where Violation(s) Occurred:
Holliday WWTP, located one-mile northeast of Holliday on the north extension of College Street, approximately 0.25 mile north of the intersection of U.S. Highway 82 and U.S Highway 277, Holliday, Archer 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: June 5, 2026
Comments Received: No

Penalty Information

Total Penalty Assessed: $18,725
Amount Deferred for Expedited Settlement: $3,745
Total Paid to General Revenue: $0
Total Due to General Revenue: $0
Payment Plan: N/A
Supplemental Environmental Project ("SEP") Conditional Offset: $14,980
Name of SEP: Facility Improvements (Compliance)
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: July 30, 2025
Date(s) of NOE(s): August 5, 2025

Executive Summary – Enforcement Matter – Case No. 68387
City of Holliday
RN101609519
Docket No. 2025-1770-MWD-E

Violation Information

Failed to comply with permitted effluent limitations for biochemical oxygen demand, total residual chlorine, total suspended solids, and *Escherichia coli* [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0014674001, Effluent Limitations and Monitoring Requirements No. 1 and 2].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By August 31, 2025, the Respondent achieved compliance with all permitted effluent limitations in TPDES Permit No. WQ0014674001.

Technical Requirements:

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

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Kolby Farren, Enforcement Division, Enforcement Team 7, MC R-12, (512) 239-2098; 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 Brad Litteken, Mayor, City of Holliday, P.O. Box 508, Holliday, Texas 76366
Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW)

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

DATES						
	Assigned	11-Aug-2025				
	PCW	9-Mar-2026	**Screening**	13-Aug-2025	**EPA Due**	

RESPONDENT/FACILITY INFORMATION			
Respondent	City of Holliday		
Reg. Ent. Ref. No.	RN101609519		
Facility/Site Region	3-Abilene	**Major/Minor Source**	Minor

CASE INFORMATION			
Enf./Case ID No.	68387	**No. of Violations**	2
Docket No.	2025-1770-MWD-E	**Order Type**	1660
Media Program(s)	Water Quality	**Government/Non-Profit**	Yes
Multi-Media		**Enf. Coordinator**	Kolby Farren
		EC's Team	Enforcement Team 7

Admin. Penalty $ Limit Minimum $0 **Maximum** $25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) ***Subtotal 1*** **$17,500**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History **17.0%** Adjustment ***Subtotals 2, 3, & 7*** **$2,975**

Notes: Enhancement for three months of self-reported effluent violations and one NOV with dissimilar violations.

Culpability No **0.0%** Enhancement ***Subtotal 4*** **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments ***Subtotal 5*** **-$1,750**

Economic Benefit **0.0%** Enhancement* ***Subtotal 6*** **$0**

Total EB Amounts $1,088
Estimated Cost of Compliance $20,000
**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 ***Final Subtotal*** **$18,725**

OTHER FACTORS AS JUSTICE MAY REQUIRE **0.0%** ***Adjustment*** **$0**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount **$18,725**

STATUTORY LIMIT ADJUSTMENT ***Final Assessed Penalty*** **$18,725**

DEFERRAL **20.0%** Reduction ***Adjustment*** **-$3,745**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **$14,980**

Screening Date	13-Aug-2025	**Docket No.** 2025-1770-MWD-E	**PCW**
Respondent	City of Holliday		*Policy Revision 5 (January 28, 2021)*
Case ID No.	68387		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN101609519		
Media	Water Quality		
Enf. Coordinator	Kolby Farren		

Compliance History Worksheet

>> Compliance History *Site* Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	3	15%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	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 (*number of judgments or consent decrees meeting criteria*)	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 (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	0	0%
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) 17%

>> 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 months of self-reported effluent violations and one NOV with dissimilar violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 17%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** 17%

Screening Date	13-Aug-2025	**Docket No.** 2025-1770-MWD-E	**PCW**
Respondent	City of Holliday		*Policy Revision 5 (January 28, 2021)*
Case ID No.	68387		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN101609519		
Media	Water Quality		
Enf. Coordinator	Kolby Farren		

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 ("TPDES") Permit No. WQ0014674001, Effluent Limitations and Monitoring Requirements No. 1 and 2
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	**Harm** Major	Moderate	Minor
Actual			x
Potential			

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: A simplified model was used to evaluate biochemical oxygen demand (5-day) to determine whether the discharged amounts of pollutants exceeded protective levels. Total suspended solids and total residual chlorine were also considered. Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.☐

Adjustment $21,250

$3,750

Violation Events

Number of Violation Events: 3 — 120 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty $11,250

Three quarterly events are recommended for each quarter containing the months of October 2024 and February, March and April 2025.

Good Faith Efforts to Comply

10.0% Reduction $1,125

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

Notes: The Respondent achieved compliance by August 31, 2025.

Violation Subtotal $10,125

Economic Benefit (EB) for this violation

Estimated EB Amount $1,088

Statutory Limit Test

Violation Final Penalty Total $12,038

This violation Final Assessed Penalty (adjusted for limits) $12,038

Economic Benefit Worksheet

Respondent City of Holliday
Case ID No. 68387
Reg. Ent. Reference No. RN101609519
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
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)	$20,000	30-Jul-2024	31-Aug-2025	1.09	$1,088	n/a	$1,088
Notes for DELAYED costs	Estimated Other cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations. The Date Required is the end date of the first month of noncompliance, and the Final Date is 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 $20,000

TOTAL $1,088

Screening Date 13-Aug-2025 **Docket No.** 2025-1770-MWD-E **PCW**

Respondent City of Holliday

Policy Revision 5 (January 28, 2021)

Case ID No. 68387

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN101609519

Media Water Quality

Enf. Coordinator Kolby Farren

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0014674001, Effluent Limitations and Monitoring Requirements No. 1

Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual		x	
Potential			

Percent 25.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Total suspended solids and *escherichia coli* were evaluated to determine whether the discharged amounts of pollutants exceeded protective levels. Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment $18,750

$6,250

Violation Events

Number of Violation Events 1 — 30 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty $6,250

One monthly event is recommeded for the month of the June, 2024.

Good Faith Efforts to Comply

10.0% Reduction $625

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

Notes: The Respondent achieved compliance by August 31, 2025.

Violation Subtotal $5,625

Economic Benefit (EB) for this violation

Estimated EB Amount $0

Statutory Limit Test

Violation Final Penalty Total $6,688

This violation Final Assessed Penalty (adjusted for limits) $6,688

Economic Benefit Worksheet

Respondent City of Holliday
Case ID No. 68387
Reg. Ent. Reference No. RN101609519
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
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. 1						
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

City of Holliday
TPDES Permit No. WQ0014674001
Docket No. 2025-1770-MWD-E
Case No. 68387

Effluent Violation Table					
Monitoring Period	Biochemical Oxygen Demand Daily Average Loading Limit= 33 lbs/day	Total Residual Chlorine Monthly Minimum Concentration Limit= 1 mg/l	Escherichia coli Single Grab Concentration Limit= 399 CFU/100	Total Suspended Solids Daily Average Concentration Limit= 20 mg/l	Total Suspended Solids Single Grab Concentration Limit= 65 mg/l
June 2024	c	c	2420	20.23	c
October 2024	c	0.97	c	c	c
February 2025	c	c	c	42.5	67.1
March 2025	c	c	c	31.08	c
April 2025	34.32	0.5	c	c	c

Lbs/day = Pounds per Day mg/l = Milligrams per Liter
CFU/100 = Colony Forming Units per 100 milliliters c = Compliant

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

Compliance History Report

Compliance History Report for CN600682520, RN101609519, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator: CN600682520, City of Holliday **Classification:** SATISFACTORY **Rating:** 1.02

Regulated Entity: RN101609519, HOLLIDAY WWTP **Classification:** SATISFACTORY **Rating:** 1.75

Complexity Points: 7 **Repeat Violator:** NO

CH Group: 08 - Sewage Treatment Facilities

Location: one mile northeast of the City of Holliday on the north extension of College Street, approximately 0.25 miles north of the intersection of U.S. Highway 82 and U.S Highway 277, in Holliday, Archer County, Texas

TCEQ Region: REGION 03 - ABILENE

ID Number(s):
WASTEWATER EPA ID TX0025755 **WASTEWATER** PERMIT WQ0014674001
WASTEWATER AUTHORIZATION R14674001

Compliance History Period: September 01, 2020 to August 31, 2025 **Rating Year:** 2025 **Rating Date:** 09/01/2025

Date Compliance History Report Prepared: March 09, 2026

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: March 09, 2021 to March 09, 2026

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

Name: Kolby Farren **Phone:** (512) 239-2098

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	March 17, 2021	(1726477)
Item 2	April 16, 2021	(1726478)
Item 3	May 17, 2021	(1740542)
Item 4	June 17, 2021	(1747754)
Item 5	July 19, 2021	(1752025)
Item 6	August 13, 2021	(1757479)
Item 7	September 17, 2021	(1766587)
Item 8	October 14, 2021	(1777150)
Item 9	November 18, 2021	(1783943)
Item 10	December 14, 2021	(1790973)
Item 11	January 17, 2022	(1798762)
Item 12	February 16, 2022	(1806638)
Item 13	April 18, 2022	(1820275)
Item 14	May 16, 2022	(1829115)
Item 15	July 18, 2022	(1842610)
Item 16	August 09, 2022	(1848740)
Item 17	September 19, 2022	(1856540)
Item 18	October 10, 2022	(1862898)

Item 19	December 15, 2022	(1875660)	Item 33	June 10, 2024	(2003963)
Item 20	February 07, 2023	(1890294)	Item 34	August 12, 2024	(2017114)
Item 21	March 07, 2023	(1898857)	Item 35	September 12, 2024	(2024135)
Item 22	May 12, 2023	(1912824)	Item 36	October 16, 2024	(2030258)
Item 23	June 09, 2023	(1919431)	Item 37	December 12, 2024	(2042927)
Item 24	July 13, 2023	(1926397)	Item 38	January 13, 2025	(2049515)
Item 25	August 08, 2023	(1933355)	Item 39	February 11, 2025	(2057085)
Item 26	September 12, 2023	(1939496)	Item 40	July 03, 2025	(2093053)
Item 27	October 11, 2023	(1946344)	Item 41	August 08, 2025	(2099633)
Item 28	December 08, 2023	(1961802)	Item 42	September 09, 2025	(2109146)
Item 29	February 16, 2024	(1977455)	Item 43	October 09, 2025	(2109147)
Item 30	March 11, 2024	(1984022)	Item 44	November 12, 2025	(2118261)
Item 31	April 04, 2024	(1990552)	Item 45	December 09, 2025	(2125124)
Item 32	May 09, 2024	(1997008)			

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

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

1 Date: 03/31/2025 (2072462)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

2 Date: 04/30/2025 (2078852)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

3 Date: 05/31/2025 (2085947)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

4 Date: 06/10/2025 (2064532)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 217, SubChapter B 217.33(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
MONITORING AND REPORTING REQUIREMENTS, 5 PERMIT
Description: Failure to calibrate the secondary effluent measuring device at least annually.

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

Component Appendices

Appendix A
All NOVs Issued During Component Period 3/9/2021 and 3/9/2026

1 Date: 02/28/2022 (1813703)

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

2 Date: 05/31/2022 (1835406)

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

3 Date: 10/31/2022 (1869811)

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

4 Date: 12/31/2022 (1882481)

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

5 Date: 03/31/2023 (1905646)

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

6 Date: 10/31/2023 (1952033)

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

7 Date: 12/31/2023 (1968396)

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

8 Date: 06/30/2024 (2011519)

Self Report? YES Classification: Moderate

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

30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

9* Date: 10/31/2024 (2036583)

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

10* Date: 02/28/2025 (2065649)

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

11* Date: 03/31/2025 (2072462)

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

12* Date: 04/30/2025 (2078852)

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

13* Date: 05/31/2025 (2085947)

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

14* Date: 06/10/2025 (2064532)

Self Report? NO Classification: Minor
Citation:
30 TAC Chapter 217, SubChapter B 217.33(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
MONITORING AND REPORTING REQUIREMENTS, 5 PERMIT
Description: Failure to calibrate the secondary effluent measuring device at least annually.

* NOVs applicable for the Compliance History rating period 9/1/2020 to 8/31/2025

Appendix B
All Investigations Conducted During Component Period March 09, 2021 and March 09, 2026

Item 1*	March 17, 2021**	(1726477)
Item 2	April 12, 2021**	(1708051)
Item 3*	April 16, 2021**	(1726478)
Item 4*	May 17, 2021**	(1740542)
Item 5*	June 17, 2021**	(1747754)
Item 6*	July 19, 2021**	(1752025)

Item 7*	August 13, 2021**	(1757479)
Item 8*	September 17, 2021**	(1766587)
Item 9*	October 14, 2021**	(1777150)
Item 10*	November 18, 2021**	(1783943)
Item 11*	December 14, 2021**	(1790973)
Item 12*	January 17, 2022**	(1798762)
Item 13*	February 16, 2022**	(1806638)
Item 14	March 18, 2022**	(1813703)
Item 15*	April 18, 2022**	(1820275)
Item 16*	May 16, 2022**	(1829115)
Item 17	June 14, 2022**	(1835406)
Item 18*	July 18, 2022**	(1842610)
Item 19*	August 09, 2022**	(1848740)
Item 20*	September 19, 2022**	(1856540)
Item 21*	October 10, 2022**	(1862898)
Item 22	November 16, 2022**	(1869811)
Item 23*	December 15, 2022**	(1875660)
Item 24	January 12, 2023**	(1882481)
Item 25*	February 07, 2023**	(1890294)
Item 26*	March 07, 2023**	(1898857)
Item 27	April 17, 2023**	(1905646)
Item 28*	May 12, 2023**	(1912824)
Item 29*	June 09, 2023**	(1919431)
Item 30*	July 13, 2023**	(1926397)
Item 31*	August 08, 2023**	(1933355)
Item 32*	September 12, 2023**	(1939496)
Item 33*	October 11, 2023**	(1946344)
Item 34	November 14, 2023**	(1952033)
Item 35*	December 08, 2023**	(1961802)
Item 36	January 05, 2024**	(1968396)
Item 37*	February 16, 2024**	(1977455)
Item 38*	March 11, 2024**	(1984022)
Item 39*	April 04, 2024**	(1990552)
Item 40*	May 09, 2024**	(1997008)
Item 41*	June 10, 2024**	(2003963)
Item 42	July 10, 2024**	(2011519)
Item 43*	August 12, 2024**	(2017114)
Item 44*	September 12, 2024**	(2024135)
Item 45*	October 16, 2024**	(2030258)
Item 46	November 18, 2024**	(2036583)
Item 47*	December 12, 2024**	(2042927)
Item 48*	January 13, 2025**	(2049515)
Item 49*	February 11, 2025**	(2057085)
Item 50	March 17, 2025**	(2065649)
Item 51	April 17, 2025**	(2072462)
Item 52	May 09, 2025**	(2078852)
Item 53	June 10, 2025**	(2064532)
Item 54	June 18, 2025**	(2085947)

Item 55*	July 03, 2025**	(2093053)
Item 56	August 08, 2025**	(2084670)
Item 57*	September 09, 2025	(2109146)
Item 58*	October 09, 2025	(2109147)
Item 59*	November 12, 2025	(2118261)
Item 60*	December 09, 2025	(2125124)

* No violations documented during this investigation
**Investigation applicable for the Compliance History Rating period between 09/01/2020 and 08/31/2025.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN	**§**	**BEFORE THE**
ENFORCEMENT ACTION	**§**	
CONCERNING	**§**	**TEXAS COMMISSION ON**
CITY OF HOLLIDAY	**§**	
RN101609519	**§**	**ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2025-1770-MWD-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Holliday (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 one mile northeast of the City of Holliday on the north extension of College Street, approximately 0.25 miles north of the intersection of U.S. Highway 82 and U.S Highway 277 in Holliday, Archer 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 $18,725 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The amount of $3,745 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, $14,980 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 by August 31, 2025, the Respondent achieved compliance with all permitted effluent limitations in Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0014674001.

II. ALLEGATIONS

During a record review for the Facility conducted on July 30, 2025, an investigator documented that the Respondent, failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0014674001, Effluent Limitations and Monitoring Requirements No. 1 and 2, as shown in Attachment B.

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 Holliday, Docket No. 2025-1770-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 has implemented and completed the SEP as set forth in Section I, Paragraph No. 4. The amount of $14,980 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. 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.

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

Kristie Mello-Jurach _____
For the Executive Director Date: 06/28/2026

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.

_____ 5/18/2026
Signature Date

BRAD LITTEKEN MAYOR
Name (Printed or typed) Title
Authorized Representative of
City of Holliday

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

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: 2025-1770-MWD-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	City of Holliday
Penalty Amount:	$14,980
SEP Offset Amount:	$14,980
Type of SEP:	Compliance
Project Name:	*Facility Improvements*
Location of SEP:	Archer County

The Texas Commission on Environmental Quality ("the Commission" or "TCEQ") agrees to offset the administrative Penalty Amount assessed in this Agreed Order in exchange for Respondent's performance of a Supplemental Environmental Project ("SEP").

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

1. Project Description

A. Project

Respondent hired a contractor to purchase and install a submersible grinder pump at the lift station of the Facility. Additionally, repairs were performed on the aerator, which included repairs to shaft, gearbox, and replacing bearings. Specifically, the SEP Offset Amount was used for materials, supplies, and equipment for the submersible grinder pump and repairs to the aerator (the "Project"). Respondent hired qualified contractors to perform the Project. The SEP was performed in accordance with all federal, state, and local environmental laws and regulations.

Respondent used 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. Expenses. No portion of the SEP Offset Amount was 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 had no prior commitment to perform this Project and that the SEP was performed solely as part of the terms of settlement in this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by improving the quality of wastewater effluent being released into the environment. Inadequately treated effluent can carry bacteria, viruses, protozoa (parasitic organisms), helminths (intestinal worms), and bioaerosols (inhalable molds and fungi). The diseases they may cause range in severity from mild gastroenteritis to life-threatening ailments such as cholera, dysentery, infectious hepatitis, and severe gastroenteritis. Additional risks include occurrences of low dissolved oxygen, fish kills, algal bloom, and bacterial contamination in waterways.

C. Expenses

Respondent spent at least the SEP Offset Amount to complete the project described in Section 1.A, above, and complied with all other provisions of this SEP. Respondent understood that it may have cost more than the SEP Offset Amount to complete the Project.

Expenses

Item	Total
Submersible Grinder Pump	$7,068.22
Paddle Wheel Aerator Shaft Repair	$1,658.12
Aerator Gearbox Repair	$1,455.09
Replacement Bearings	$5,434.39
Total	**$15,615.82**

2. Records

As of April 9, 2026, Respondent provided TCEQ the following documentation as proof of completion of the proposed SEP:

A. An itemized list of expenditures and total cost of the Project;

B. Copies of invoices or receipts corresponding to the itemized list in paragraph 2.A., above;

C. Copies of cleared checks or payment records corresponding to the itemized list in paragraph 2.A., above;

D. A certified statement of SEP completion and document authentication;

E. A detailed map showing the specific location of the Project sites; and

F. Photographs of the completed Project.

3. Additional Information and Access

Respondent shall provide additional information as requested by TCEQ staff and shall allow immediate (i.e., within 24 hours) 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.

4. Failure to Fully Perform

If Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the Executive Director ("ED") may require immediate payment of all or part of the SEP Offset Amount as set forth in the attached Agreed Order.

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

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

5. 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.

6. Recognition

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

7. 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.