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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 10, 2005

**CERTIFIED MAIL 7002 0860 0004 6482 7718**  
**RETURN RECEIPT REQUESTED**

The Honorable Donald R. Hill, Mayor  
City of Taylor  
400 Porter Street  
Taylor, Texas 76574

Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Mustang Creek Wastewater Treatment Facility, 100 Larry Street, Taylor (Williamson County),  
Texas  
TCEQ ID No.:WQ10299001, EPA ID No.: TX0020443, RN102181583, CN600740716

Dear Mayor Hill:

On May 10, 2005, Claudia A. Chaffin of the Texas Commission on Environmental Quality (TCEQ) Austin Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for wastewater treatment. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by July 15, 2005 a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules." Copies of applicable federal regulations may be obtained from either of the following offices:

U.S. Government Printing Office  
Texas Crude Building  
801 Travis Street  
Houston, Texas 77002  
713/228-1187 (phone)

U.S. Government Printing Office  
Room 1C-50  
Federal Building  
1100 Commerce Street  
Dallas, Texas 75242  
214/767-0076 (phone)

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ

(Rev. 1/24/02)

REPLY TO: REGION 11 • 1921 CEDAR BEND DR., STE. 150 • AUSTIN, TEXAS 78758-5336 • 512/339-2929 • FAX 512/339-3795

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: [www.tceq.state.tx.us](http://www.tceq.state.tx.us)

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Mayor Brown  
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enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify the Austin Region Office within 10 days from the date of this letter. At that time, Water Program Manager, Ms. Carolyn Runyon will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Claudia A. Chaffin in the Austin Region Office at (512)339-2929.

Sincerely,



Carolyn Runyon  
Water Section Manager  
Austin Region Office

CDR/cac

cc: Frank Salvato, City Manager, City of Taylor, 400 Porter Street, Taylor, Texas 76574  
Bill Brown, Public Works Director, City of Taylor, 1201 North Main Street, Taylor, Texas 76574  
Nathan Reyes, Chief Wastewater Plant Operator, City of Taylor, 1201 North Main Street, Taylor, Texas 76574  
Marcia Bohling(6EN-AS), U.S. EPA, 1445 Ross Avenue, Dallas, Texas, 75202

Enclosures: Summary of Investigation Findings  
*Obtaining TCEQ Rules*

# Summary of Investigation Findings

CITY OF TAYLOR

Investigation # 379654

, WILLIAMSON COUNTY,

Investigation Date: 05/10/2005

Additional ID(s): WQ0010299001  
TPDES0020443  
TX0020443

## OUTSTANDING ALLEGED VIOLATIONS

Track No: 206705 Compliance Due Date: 07/15/2005

30 TAC Chapter 305.125(4)

30 TAC Chapter 305.125(5)

TWC Chapter 26.121

TWC Chapter 26.121(a)(1)

TWC Chapter 26.121(a)(2)

TWC Chapter 26.121(a)(3)

TWC Chapter 26.121(a)[G]

TWC Chapter 26.121(b)

TWC Chapter 26.121(c)

TWC Chapter 26.121(d)

TWC Chapter 26.121(e)

TWC Chapter 26.121[G]

PERMIT Permit Conditions, 2. g

### Alleged Violation:

Investigation: 379654

Comment Date: 6/3/2005

Six unauthorized discharges since the last comprehensive compliance investigation occurred within the wastewater collection system. They were caused by isolated events and/or factors beyond reasonable control that will take less than six months to correct. The discharges were caused by grease blockages and debris blockages and construction contractor damage.

**Recommended Corrective Action:** The City of Taylor must immediately begin taking all actions necessary to prevent all unauthorized discharges that are within control of the facility. Such preventive actions must include, but are not limited to, the development, implementation, and enforcement of a grease ordinance and private collection line maintenance ordinance, the routine cleaning of the collection system (lines and lift stations) to prevent the buildup of grease and debris, the routine maintenance of pumps and electrical equipment at all lift stations, the installation of markers and other equipment as necessary to protect collection lines and appurtenances from vehicles and other hazards, and the repairing or replacement of all collection lines that are a source of infiltration and inflow.

The City of Taylor must submit to the TCEQ Austin Region Office by the stipulated due date, a written plan with an implementation schedule including all applicable completion dates, which outlines the commencement and completion of: (1) the implementation and enforcement of a grease trap and private collection line maintenance ordinance, (2) a routine collection system cleaning schedule that will be employed to prevent the build up of grease and debris, (3) a planned maintenance schedule for all pumps and electrical equipment at all lift stations, (4) the installation of markers and other equipment as necessary to protect collection lines and appurtenances which are vulnerable to vehicles and other hazards, (5) a testing/repair/replacement schedule for collection lines and appurtenances that are sources of infiltration and inflow.