Order Type: Findings Agreed Order **Findings Order Justification:** Indifference to legal duty based on violation of a previous order. Media: PWS and UTL Small Business: No Location Where Violation) Occurred: intersection of State Highway 8 and State Highway 77, Douglassville, Cass County **Type of Operation:** public water supply **Other Significant Matters:** Additional Pending Enforcement Actions: Yes; 2023-1475-PWS-E **Past-Due Penalties:** None Past-Due Fees: None Other: None **Interested Third-Parties:** None **Texas Register Publication Date:** February 28, 2025 **Comments Received:** None **Penalty Information Total Penalty Assessed:** \$13,904 \$0 **Total Paid to General Revenue: Total Due to General Revenue:** \$0 Supplemental Environmental Project ("SEP") Conditional Offset: \$13.904 Name of SEP: PWS Interconnect; Cass County **Compliance History Classifications:** Person/CN - N/A Site/RN - N/A **Major Source:** No **Statutory Limit Adjustment:** None **Applicable Penalty Policy:** April 2014 (PCW 1); January 28, 2021 (PCW 2) **Investigation Information Complaint Date(s):** N/A **Dates of Investigation:** February 25, 2019; September 9. 2022 Dates of NOVs: July 7, 2020; February 25, 2021; July 26, 2022

April 26, 2019: September 9, 2022

Dates of NOEs:

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 47278 City of Douglassville RN101388437 Docket No. 2019-0676-MLM-E

Violation Information

- 1. Failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation [30 Tex. ADMIN. CODE § 290.46(f)(2), (f)(3)(B)(iii), (f)(3)(D)(i), and (f)(3)(E)(iv) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E Ordering Provision No. 2.a.i.].
- 2. Failed to inspect the interior surface of a pressure tank provided with an inspection port every five years [30 TEX. ADMIN. CODE § 290.46(m)(1)(B) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.a.ii.].
- 3. Failed to maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements [30 TEX. ADMIN. CODE § 290.121(a) and (b) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.a.v.].
- 4. Failed to ensure that all clearwells, ground storage tanks, standpipes, and elevated tanks are painted, disinfected, and maintained in strict accordance with current American Water Works Association standards [30 Tex. ADMIN. CODE § 290.43(c)(8) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.c.i.].
- 5. Failed to provide a device to readily determine the air-water-volume for the pressure tank [30 TEX. ADMIN. CODE § 290.43(d)(3) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.c.ii.].
- 6. Failed to provide a primary roof access opening of not less than 30 inches in diameter if an alternative 30-inch diameter access opening is not provided in the Facility's ground storage tank [30 TEX. ADMIN. CODE § 290.43(c)(2) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E], Ordering Provision No. 2.e.ii.].
- Failed to maintain accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank at the Facility [30 TEX. ADMIN. CODE § 290.46(n)(1) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.e.iii.].
- 8. Failed to locate the Facility's well at least 150 feet away from an underground petroleum storage tank [30 Tex. ADMIN. CODE § 290.41(c)(1)(A) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.g.].
- 9. Failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation [30 Tex. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(iii), (f)(3)(A)(vi), and (f)(3)(D)(ii)].
- 10. Failed to calibrate the Facility's well meter at least once every three years [30 Tex. ADMIN. CODE § 290.46(s)(1)].
- 11. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment [30 Tex. ADMIN. CODE § 290.46(m)].
- 12. Failed to provide all water storage tanks with a liquid level indicator calibrated in feet of water located at the tank site [30 Tex. ADMIN. CODE § 290.43(c)(4)].
- 13. Failed to ensure that all chemicals and any additional or replacement process media used in treatment of water supplied by the PWS conform to the American National Standards Institute/National Sanitation Foundation Standard 60 for Drinking Water Treatment Chemicals [30 Tex. ADMIN. CODE § 290.42(j)].
- 14. Failed to house the hypochlorination solution container in a secure enclosure to protect it from adverse weather conditions and vandalism [30 Tex. ADMIN. CODE § 290.42(e)(5)].

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 47278 City of Douglassville RN101388437 Docket No. 2019-0676-MLM-E

- 15. Failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted [30 Tex. ADMIN. CODE § 290.46(i)].
- 16. Failed to provide the Facility's pressure tank with a pressure release device [30 Tex. ADMIN. CODE § 290.43(d)(2)].
- 17. Failed to ensure that all electrical wiring is securely installed in compliance with a local or national electrical code [30 Tex. ADMIN. CODE § 290.46(v) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.a.vi.].
- 18. Failed to adopt and submit to the TCEQ for approval an emergency preparedness plan that demonstrates the Facility's ability to provide emergency operations [TEX. WATER CODE § 13.1394(b)(2)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed: None

Technical Requirements:

- 1. Within 195 days implement an interconnect with Western Cass Water Supply Corporation.
- 2. Within 210 days submit written certification to demonstrate compliance with Technical Requirement No. 1.

Litigation Information

Date Petitions Filed:	May 21, 2021; June 28, 2021
Dates of Service:	unclaimed; unclaimed
Settlement Date:	November 26, 2024

Contact Information

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

TCEQ Litigation Agenda Coordinator: Katherine McKenzie, Litigation Division, (512) 239-2575

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

TCEQ Enforcement Coordinator: Yuliya Dunaway, Enforcement Division, (210) 403-4077

TCEQ Regional Contact: Ross Morgan, Tyler Regional Office, (903) 535-5100

Respondent Contact: Dewitt McCall, Mayor, City of Douglassville, P.O. Box 36, Douglassville, Texas 75560

Respondent's Attorney: N/A

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Policy Re	evision 4 (Ap		enalty Ca	Iculatio	n Worksh	eet (PC	•	n March 26, 2014
DATES A	ssigned PCW	29-Apr-2019 10-May-2019	Screening 1	. <mark>3-May-2019</mark>	EPA Due			
Res	pondent	TY INFORMATI City of Douglass						
Reg. Ent. Facility/Site		RN101388437 5-Tyler			Major/M	inor Source	Minor	
CASE INFORM Enf./Case	e ID No.	47278 2019-0676-MLM	-F		No. o	f Violations Order Type		
Media Pro	gram(s)	Public Water Su Public Water Uti	pply		Government Enf.	/Non-Profit Coordinator		5
Admin. Pe	enalty \$ I	imit Minimum.	\$50 M	laximum	\$1,000			<u>, </u>
TOTAL BAS		LTY (Sum of	,		tion Sectio	n	Cubbabal 1	¢8.640
		/-) TO SUBT		ase penan	ies)		Subtotal 1	\$8,640
Subtotal	s 2-7 are ob	tained by multiplyin	g the Total Base Per	nalty (Subtotal 1) 52.0%	by the indicated pe Adjustment		otals 2, 3, & 7	\$4,492
	Notes	same/similar vi	olations, one ag	reed order co	iolations, one N ntaining a denia denial of liability	al of liability,		
Culpal	bility	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Re	espondent does	not meet the	culpability crite	ria.		
Good	Faith Eff	ort to Comply T	otal Adjustme	ents			Subtotal 5	\$0
Econo	Estimated	Total EB Amounts Cost of Compliance	\$6,226 \$33,541		Enhancement* I at the Total EB \$ A	mount	Subtotal 6	\$0
SUM OF SU	BTOTA	LS 1-7				I	Final Subtotal	\$13,132
		Subtotal by the indi		RE [0.0%		Adjustment	\$0
N	otes							
						Final Pe	nalty Amount	\$13,132
STATUTORY	Y LIMII	ADJUSTME	NT			Final Asse	essed Penalty	\$13,294
DEFERRAL Reduces the Final	Assessed Pe	nalty by the indicate	d percentage.		0.0%	Reduction	Adjustment	\$0
N	otes	No	deferral is recor	nmended for	Findings Orders			
	ENALT							\$13,294

PCW

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

Media Public Water Supply

Enf. Coordinator Kaisie Hubschmitt

Compliance History Site Enhancement (Subtotal 2)

Docket No. 2019-0676-MLM-E

Component	Number of	Number	Adjust
	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	1	5%
	Other written NOVs	1	2%
	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	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	1	25%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
	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 (<i>number of audits for which violations were disclosed</i>)	0	0%
	Environmental management systems in place for one year or more	Ne	00/
-	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 Per	centage (Sub	ototal 2
		J	

	N/A	Adjustment Percentage (Subtotal 3) 0%	
>>	Compliance Histor	Person Classification (Subtotal 7)	
	N/A	Adjustment Percentage (Subtotal 7) 0%	
>>	Compliance Histor	Summary	
	Compliance History Notes	nhancement for one NOV with dissimilar violations, one NOV with the same/similar violations, e agreed order containing a denial of liability, and one agreed order without a denial of liability.	
>>	Final Compliance H	Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 52%	
		Final Adjustment Percentage *capped at 100% 52%	

	Scre	ening Date	13-May-2019	Docket No. 2019-0676-MLM-E	PCW
			City of Douglassville	Policy	/ Revision 4 (April 2014)
_		Case ID No.		PCW	Revision March 26, 2014
Reg.	Ent. Ref		RN101388437		
	Enf (Public Water Supply Kaisie Hubschmitt		
		ation Number			
		Rule Cite(s)		0.46(f)(2), (f)(3)(B)(iii), (f)(3)(D)(i), and (f)(3)(E)(iv)	
		Rule Cite(S)		Docket No. 2016-1029-MLM-E, Ordering Provision No.	
				2.a.i	
			Failed to maintain water wo	rks operation and maintenance records and make them	
				xecutive Director during the investigation. Specifically,	
	Violatio	n Description		nonitoring records and Customer Service Inspections onally, several months of the microbiological analyses	
			were not available. Additio	records were missing.	
				Base Penalty	\$1,000
>> Env	vironme	ntal. Prope	rty and Human Health	Matrix	
			Harm		
OR		Release	Major Moderate	Minor	
UK		Actual Potential		Percent 0.0%	
		1 0 0 0 1 0 1	I <u></u> I		
>>Prog	gramma	tic Matrix	Maiau		
		Falsification	Major Moderate	Minor x Percent 1.0%	
	Matrix Notes		Less than 30% of the	e rule requirements were not met.	
	Notes				
				Adjustment \$990	1
				···· ·	
					\$10
Violatio	on Even	ts			
		Number of)	Vieletien Evente		
		Number of V	/iolation Events <u>1</u>	655 Number of violation days	
			daily	7	
			weekly]	
			monthly		+10
			quarterly semiannual	Violation Base Penalty	\$10
			annual	1	
			single event x]	
					ส
			One single	event is recommended.	
Good	aith Eff	orts to Com	0.0%	Reduction	\$0
GUUU F			Before NOE/NOV		\$0
			Extraordinary		
			Ordinary		
			N/A x	<u> </u>	
			Notes The Respond	lent does not meet the good faith criteria for	
			inores	this violation.	
			<u>l</u>	Violation Subtotal	\$10
					φ10
Econor	nic Bene	efit (EB) for	this violation	Statutory Limit Test	
		Estimate	ed EB Amount	\$6 Violation Final Penalty Total	\$15
			This viol	lation Final Assessed Penalty (adjusted for limits)	\$50
					φ 3 0

	E	conomic	Benefit	Wo	r ksheet		
Respondent		ssville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437						
Media Violation No.	Public Water S 1	Supply				Percent Interest	Years of Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$45	27-Jul-2017	1-Feb-2020	2.52	\$6	n/a	\$6
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00 ount to	\$0 maintain water sys	n/a stem operation and	\$0 maintenance
Other (as needed) Notes for DELAYED costs	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 ount to for insp er Dock compli	\$0 maintain water sys ection upon reque et No. 2016-1029- ance.	n/a stem operation and st by Agency persor -MLM-E to the estim	\$0 maintenance nnel, calculateo ated date of
Other (as needed)	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 ount to for insp er Dock compli	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for	n/a stem operation and st by Agency persor -MLM-E to the estim - one-time avoide	\$0 maintenance nnel, calculated ated date of d costs)
Other (as needed) Notes for DELAYED costs	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 ount to for insp er Dock compli tering 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for \$0	n/a stem operation and st by Agency persor MLM-E to the estim one-time avoide \$0	\$0 maintenance nnel, calculated ated date of d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 ount to for insp er Dock compli tering 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for \$0 \$0	n/a stem operation and st by Agency persor -MLM-E to the estim - one-time avoider \$0 \$0	\$0 maintenance nnel, calculatec ated date of d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 punt to for insp er Dock compli tering 0.00 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for \$0 \$0 \$0	n/a stem operation and st by Agency persor MLM-E to the estim one-time avoide \$0 \$0 \$0	\$0 maintenance nnel, calculated ated date of d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 ount to for insp er Dock compliant tering 0.00 0.00 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029 ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a stem operation and st by Agency persor MLM-E to the estim one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 maintenance nnel, calculated ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 for insp er Dock compli- tering 0.00 0.00 0.00 0.00 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stem operation and st by Agency persor MLM-E to the estim one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 maintenance ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 for insp er Dock compli 0.00 0.00 0.00 0.00 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stem operation and st by Agency persor MLM-E to the estim one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 maintenance nel, calculated ated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 for insp er Dock compli- tering 0.00 0.00 0.00 0.00 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stem operation and st by Agency persor MLM-E to the estim one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 maintenance ated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	records and m from the ef	nake them immed fective date of TC	liately available CEQ Agreed Ord	0.00 for insp er Dock compli 0.00 0.00 0.00 0.00 0.00	\$0 maintain water sys ection upon reque et No. 2016-1029- ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stem operation and st by Agency persor MLM-E to the estim one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 maintenance nel, calculated ated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Scre	ening Date	13-May-2019	Docket No. 2019-0676-MLM-E	PCW
		-	City of Douglassvil	le Policy	Revision 4 (April 2014)
Dee		Case ID No.		PCW R	evision March 26, 2014
Reg.	Епт. ке	ference No. Media	RN101388437 Public Water Supp		
	Enf. C		Kaisie Hubschmitt	9	
		ation Number			
		Rule Cite(s)	30 Tex. Admin. C	ode § 290.46(m)(1)(B) and TCEQ Agreed Order Docket No. 2016-	
				1029-MLM-E, Ordering Provision No. 2.a.ii	
			Eailed to increat t	the interior surface of a pressure tank provided with an inspection	
	Violatio	n Description	Falled to hispect i	port every five years.	
				Base Penalty	\$1,000
		ntal Duanas		Landah Matuka	
>> Env	/ironme	ntal, Proper	ty and Human	Health Matrix Harm	
		Release	Major N	1oderate Minor	
OR		Actual			
		Potential	Х	Percent 15.0%	
>>Proc	aramma	tic Matrix			
22110	granna	Falsification	Major N	1oderate Minor	
				Percent 0.0%	
	Matrix			urface of the pressure tank every five years could result in non-	
	Notes			auses loss of tank integrity, which could expose persons served by	
		the Fa	cility to contamina	nts which would exceed levels protective of human health.	
				Adjustment \$850	
					\$150
Violatia	on Even	k			
violatio	on Even	ts			
		Number of \	/iolation Events	1 655 Number of violation days	
			daily		
			weekly monthly		
			quarterly	Violation Base Penalty	\$150
			semiannual		
			annual		
			single event	x	
			(Dne single event is recommended.	
Good	aith Eff.	orts to Com	nly	0.0% Reduction	\$0
GUUU F				0.0% Reduction re NOE/NOV to EDPRP/Settlement Offer	پ 0
			Extraordinary		
			Ordinary		
			N/A	X	
			Th	e Respondent does not meet the good faith criteria for	
			Notes	this violation.	
			<u> </u>		
				Violation Subtotal	\$150
Econor	nic Beng	efit (EB) for	this violation	Statutory Limit Test	
200101	ine bene				
1					
		Estimate	ed EB Amount	\$15 Violation Final Penalty Total	\$228
		Estimate	ed EB Amount	\$15 Violation Final Penalty Total This violation Final Assessed Penalty (adjusted for limits)	\$228 \$228

	E	conomic	Benefit	Wo	rksheet		
Respondent		ssville					
Case ID No.							
Reg. Ent. Reference No.	RN101388437						
Media Violation No.	Public Water S 2	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0 \$0	\$0	\$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	ANNU	ALTZE avoided o	acto hoforo or	toring	itom (overant for	· one-time avoide	Leoste)
Avoided Costs	ANNU	ALIZE avolueu C	USIS DEIDIE EI	-	s0		
Disposal Personnel				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Personner Inspection/Reporting/Sampling	\$8	27-Jul-2017	13-May-2019	1.79	\$0 \$1	\$0 \$14	<u>\$0</u> \$15
Supplies/Equipment	<u> </u>	27-Jui-2017	15-11ay-2019	0.00	\$1	\$14 \$0	<u>\$15</u> \$0
Financial Assurance				0.00	\$0	\$0	<u>\$0</u> \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	<u>\$0</u>
Notes for AVOIDED costs		year period, annua	alized), calculate	ed from	onduct a five-year	internal pressure ta of TCEQ Agreed Or ng.	
Approx. Cost of Compliance		\$14			TOTAL		\$15

		ening Date		Docket	No. 2019-0676-MLM-E	PCW
			City of Douglassville			Policy Revision 4 (April 2014)
Rea.		ase ID No. erence No.	47278 RN101388437		,	PCW Revision March 26, 2014
			Public Water Supply			
	-		Kaisie Hubschmitt			
	Viola	tion Number Rule Cite(s)		90.121(a) and (b) an	d TCEQ Agreed Order Docket No	
				90.121(a) and (b) an 9-MLM-E, Ordering P		
			Failed to maintain an un-te	-dato chomical and r	nicrobiological monitoring plan tl	hat
	Violatio	n Description	identifies all sampling locati analytical procedures and monitoring requirements	ions, describes the sa laboratories that the	mpling frequency, and specifies Facility will use to comply with t nitoring plan lacked locations an	the he
					Base Pen	alty \$1,000
>> Env	vironme	ntal, Prope	ty and Human Health	n Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual				
		Potential			Percent 0.0%	
>>Pro	aramma	tic Matrix				
	9	Falsification	Major Moderate	Minor		
				X	Percent 1.0%	
	Matrix Notes		Less than 30% of th	e rule requirements v	vere not met.	
					Adjustment \$	990
						\$10
	_					
Violatio	on Event	S				
		Number of \	/iolation Events 1	65	5 Number of violation days	
			daily			
			weekly			
			monthly guarterly	-	Violation Base Pen	alty \$10
			semiannual			
			annual			
			single event x	<u>_</u>		
			One single	event is recommend	led.	
Good F	aith Effo	orts to Com	olv 0.0%		Reduc	tion \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Set		
			Extraordinary Ordinary			
				dent does not meet t this violatio	the good faith criteria for	
					Violation Subt	otal \$10
Econor	nic Bene	fit (EB) for	this violation		Statutory Limit Tes	t
		Estimate	ed EB Amount	\$6	Violation Final Penalty T	otal \$15
						+
				alatian First Ass	sed Penalty (adjusted for lim	its) \$50

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	47278						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$45	27-Jul-2017	1-Feb-2020	2.52	\$6	n/a	\$6
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	·		to the estin	nated da	ate of compliance.	rder Docket No. 203	
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							

		ening Date		Docket No. 2019-0676-MLM-E	PCW
		•	City of Douglassville	Policy	Revision 4 (April 2014)
		ase ID No.		PCW R	evision March 26, 2014
Reg.	. Ent. Ref		RN101388437		
	Enf C		Public Water Supply		
		oordinator	Kaisie Hubschmitt		
	VIOI		4	0.43(c)(8) and TCEQ Agreed Order Docket No. 2016-1029	
		Rule Cite(S)		M-E, Ordering Provision No. 2.c.i	
	Violatio	n Description	tanks are painted, disinf American Water Works As	earwells, ground storage tanks, standpipes, and elevated ected, and maintained in strict accordance with current sociation ("AWWA") standards. Specifically, the exterior, the Facility's ground storage tank were corroded.	
				Base Penalty	\$1,000
>> En	vironme	ntal, Proper	ty and Human Healt	h Matrix	
			Harm		
0.0		Release	Major Moderate	Minor	
OR		Actual Potential		Percent 5.0%	
		Fotential	X	Percent 5.0%	
>>Pro	gramma	tic Matrix			
_		Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix			tank in accordance with AWWA standards could allow a	
	Notes	significant am	ount of contaminants to ent	ter the water supply which not exceed levels protective of	
				human health.	
				Adjustment \$950	
				Aujustment \$550	
				[\$50
\/:-I-+:		-			
violati	ion Event	S			
		Number of \	/iolation Events 8	655 Number of violation days	
			daily		
			weekly		
			monthly		+ 100
			quarterly <u>x</u>	Violation Base Penalty	\$400
			semiannual	-	
			single event		
		Fight quarter	v overts are recommended	, calculated from the effective date of TCEQ Agreed Order	
				ly 27, 2017, to the screening date, May 13, 2019.	
			,	, , , , , , , , , , , , , , , , , , , ,	
Good	Faith Eff	orte to Com		lo lo di stati a la l	¢∩
Good F	Faith Effo	orts to Com			\$0
Good F	Faith Effo	orts to Com	ply 0.09 Before NOE/NOV Extraordinary		\$0
Good I	Faith Effo	orts to Com	Before NOE/NO		\$0
Good F	Faith Effo	orts to Com	Before NOE/NO		\$0
Good F	Faith Effo	orts to Com	Before NOE/NO Extraordinary Ordinary N/A x		\$0
Good F	Faith Effo	orts to Com	Before NOE/NO Extraordinary Ordinary N/A x The Respon	V NOE/NOV to EDPRP/Settlement Offer	\$0
Good F	Faith Effo	orts to Com	Before NOE/NO Extraordinary Ordinary N/A x The Respon	V NOE/NOV to EDPRP/Settlement Offer	\$0
			Before NOE/NOE Extraordinary Ordinary N/A x Notes	V NOE/NOV to EDPRP/Settlement Offer	
			Before NOE/NO Extraordinary Ordinary N/A x The Respon	V NOE/NOV to EDPRP/Settlement Offer	
		fit (EB) for	Before NOE/NOE Extraordinary Ordinary N/A x Notes	V NOE/NOV to EDPRP/Settlement Offer	
		fit (EB) for	Before NOE/NOT Extraordinary Ordinary N/A x Notes The Respon	V NOE/NOV to EDPRP/Settlement Offer	\$400

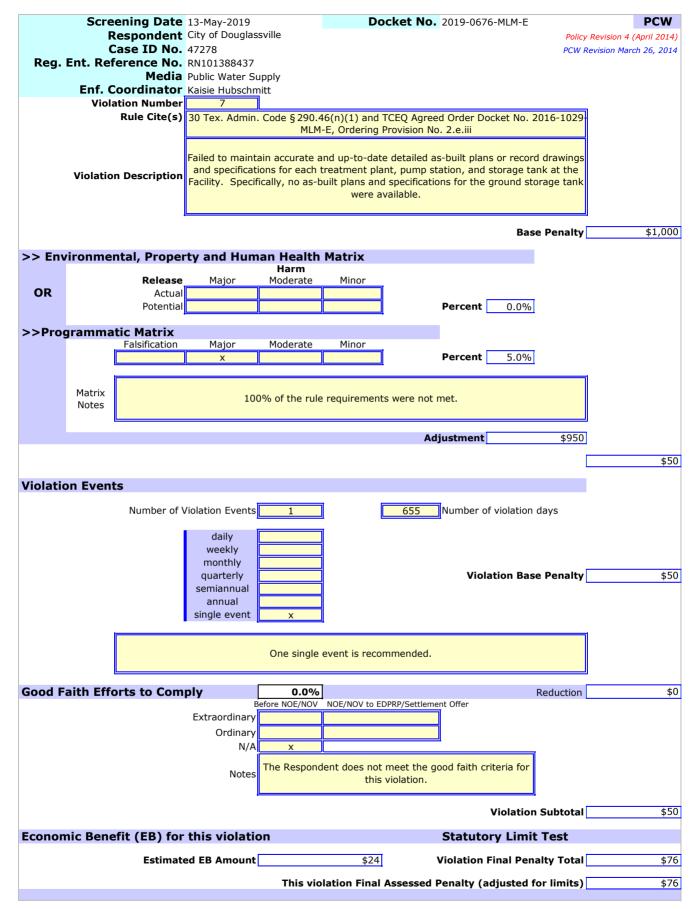
	E	conomic	Benefit	Wo	rksheet		
Respondent		ssville					
Case ID No.	47278						
leg. Ent. Reference No.	RN101388437	,					
Media Violation No.	Public Water S 4	Supply				Percent Interest	Years of Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
-							
Delayed Costs							
Equipment	1			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$5,000	27-Jul-2017	1-Mar-2020	2.60	\$649	n/a	\$649
	The delayed c	osts include the e	stimated amoui	nt to pa		naintain in accordar	nce with AWWA
Notes for DELAYED costs	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	d from t the est	he effective date of con	of TCEQ Agreed Ord mpliance.	er Docket No.
Avoided Costs	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	d from t the est	he effective date of imated date of con item (except for	of TCEQ Agreed Ord mpliance.	er Docket No. d costs)
Avoided Costs Disposal	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	the est the cont the cont tering	the effective date of imated date of con item (except for \$0	of TCEQ Agreed Orden npliance. Tone-time avoided \$0	er Docket No. d costs) \$0
Avoided Costs Disposal Personnel	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	the est the est tering 0.00 0.00	the effective date of imated date of con item (except for \$0 \$0	of TCEQ Agreed Ord npliance. • one-time avoide \$0 \$0	er Docket No. d costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	the est the est tering 0.00 0.00 0.00	the effective date of cimated date of cor item (except for \$0 \$0 \$0	of TCEQ Agreed Ord npliance. one-time avoided \$0 \$0 \$0	er Docket No. d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	the est the est 0.00 0.00 0.00 0.00	the effective date of timated date of cor item (except for \$0 \$0 \$0 \$0 \$0	of TCEQ Agreed Ord- npliance. • one-time avoided \$0 \$0 \$0 \$0	er Docket No. d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	trom t the est 0.00 0.00 0.00 0.00 0.00 0.00	the effective date of cimated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of TCEQ Agreed Ord npliance. • one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	er Docket No. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	the est the est 0.00 0.00 0.00 0.00 0.00 0.00 0.00	the effective date of cimated date of correct item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of TCEQ Agreed Ord npliance. • one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	er Docket No. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	trom t the est 0.00 0.00 0.00 0.00 0.00 0.00	the effective date of cimated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of TCEQ Agreed Ord- npliance. • one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	er Docket No. 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	standards th	e ground storage 2016-	tank, calculate 1029-MLM-E to	the est the est 0.00 0.00 0.00 0.00 0.00 0.00 0.00	the effective date of cimated date of correct item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of TCEQ Agreed Ord npliance. • one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	er Docket No. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Scre	ening Date	13-May-2019	Docket No. 2019-0676-MLM-E	PCW
	R	espondent	City of Douglassville		Policy Revision 4 (April 2014)
	C	ase ID No.	47278		PCW Revision March 26, 2014
Reg.	Ent. Ref	erence No.			
			Public Water Supply		
			Kaisie Hubschmitt		
	Viola	ation Number	5		
		Rule Cite(s)		0.43(d)(3) and TCEQ Agreed Order Docket No. 2016-	1029·
			ML	M-E, Ordering Provision No. 2.c.ii	
	Violatio	n Description	Failed to provide a dev	rice to readily determine the air-water-volume for the pressure tank.	:
				Base Per	nalty\$1,000
>> Env	vironme	ntal, Proper	ty and Human Healt	h Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual	Mujor Moderate		
		Potential	X	Percent 5.0%	
>>Prog	gramma	tic Matrix	Maian Madavata	Minese	
		Falsification	Major Moderate	Minor Percent 0.0%	
		Egiluro to pro	vide the prossure tanks wit	n an air-water-volume device may not allow the operation	ator
	Matrix			e an adequate pressure and could cause persons ser	
	Notes			nt amount of contaminants which would not exceed l	
			protec	tive of human health.	
		L			
				Adjustment	\$950
					\$50
					<u> </u>
Violatio	on Event	s			
		Number of V	Vieletien Evente		
		Number of V	/iolation Events 8	655 Number of violation days	
			daily weekly monthly quarterly x semiannual annual single event	Violation Base Per	nalty \$400
				calculated from the effective date of TCEQ Agreed O ly 27, 2017, to the screening date, May 13, 2019.	rder
Good F	aith Effo	orts to Com			ction \$0
			Before NOE/NO Extraordinary	V NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A <mark>x</mark>		
			Notes The Respo	ndent does not meet the good faith criteria for this violation.	
				Violation Sub	total \$400
Econon	nic Bene	fit (EB) for	this violation	Statutory Limit Tes	t
		Estimate	ed EB Amount	\$91 Violation Final Penalty 1	fotal \$608
			This v	iolation Final Assessed Penalty (adjusted for lin	nits) \$608

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	47278						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
· · · · ·							
Delayed Costs							
Equipment	\$500	27-Jul-2017	1-Mar-2020	2.60	\$4	\$87	\$91
Buildings	<i><i><i>4300</i></i></i>	27 501 2017	1 1101 2020	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	volume for t	ne Facility's pressu No. 201	ire tanke, calcu 6-1029-MLM-E	lated fr	om the effective d estimated date of c	readily determine t ate of TCEQ Agreed compliance.	Order Docket
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$500			TOTAL		\$91

	Screening Dat	e 13-May-2019	Docket No. 2019-0676-MLM-E	PCW
		t City of Douglassville	Polic	y Revision 4 (April 2014)
	Case ID No		PCW	Revision March 26, 2014
Reg. Ent	t. Reference No			
_		a Public Water Supply		
E		r Kaisie Hubschmitt		
	Violation Number			7
	Rule Cite(s		.43(c)(2) and TCEQ Agreed Order Docket No. 2016-1029	
			M-E, Ordering Provision No. 2.e.ii	
Vi	iolation Descriptio	n diameter if an alternative Facility's ground storage tar	mary roof access opening of not less than 30 inches in 30-inch diameter access opening is not provided in the nk. Specifically, neither one of the two access openings of storage tank were at least 30 inches in diameter.	
			Base Penalty	\$1,000
>> Enviro	onmental, Prop	erty and Human Health	n Matrix	
		Harm		
OR	Releas		Minor	
UK	Actu Potenti		Percent 5.0%	
	Potenti		Percent 5.0%	
>>Progra	mmatic Matrix			
	Falsification	Major Moderate	Minor	
			Percent 0.0%	
				_
		f the water supply, exposing p	ng for the Facility's ground storage tank could result in persons served by the Facility to a significant amount of ot exceed levels protective of human health.	
			Adjustment \$950	n –
				-
				\$50
Violation	Fvonte			
Violation	Lvents			
	Number o	f Violation Events 8	655 Number of violation days	
		dailyweeklymonthlyquarterlyxsemiannualannualsingle event	Violation Base Penalty	\$400
		, , , , , , , , , , , , , , , , , , , ,	calculated from the effective date of TCEQ Agreed Order y 27, 2017, to the screening date, May 13, 2019.	
Good Fait	h Efforts to Coi			\$0
		Before NOE/NOV	/ NOE/NOV to EDPRP/Settlement Offer	
		Extraordinary		
		Ordinary		
		N/A x		
		Notes The Respon	dent does not meet the good faith criteria for this violation.	
			Violation Subtota	\$400
Economic	Benefit (EB) fo	or this violation	Statutory Limit Test	
	Estima	ited EB Amount	\$93 Violation Final Penalty Total	\$608
	Estima	ited EB Amount	\$93 Violation Final Penalty Total olation Final Assessed Penalty (adjusted for limits)	· · · ·

		conomic	Benefit	Wo	rksheet		
Respondent	City of Dougla	ssville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437	,					
	Public Water S						Years of
Violation No.	. 6					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		Date Required	i mai Date	113	Interest Saveu	costs saveu	LD Amount
Item Description	1						
Delayed Costs							
Equipment	, 			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$500	27-Jul-2017	1-Apr-2020	2.68	\$4	\$89	\$93
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
	,			unt to pr	rovide a primary ro	oof access opening c	of not less than
Notes for DELAYED costs	30 inches in	diameter or an all	ternative 30-in fective date of	int to pr ch diame TCEQ A	rovide a primary ro eter access openin	· · · · · · · · · · · · · · · · · · ·	of not less than round storage
Notes for DELAYED costs	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	int to pr ch diame TCEQ Ag ed date	rovide a primary ro eter access openin greed Order Docke of compliance.	oof access opening c g for the Facility's g	of not less than round storage LM-E to the
	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	int to pr ch diame TCEQ Ag ed date	rovide a primary ro eter access openin greed Order Docke of compliance.	oof access opening c g for the Facility's g et No. 2016-1029-M	of not less than round storage LM-E to the
Avoided Costs	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	int to pr ch diame TCEQ Ag ed date	rovide a primary ro eter access openin greed Order Docke of compliance. item (except for \$0 \$0	oof access opening c g for the Facility's g et No. 2016-1029-M r one-time avoide \$0 \$0	of not less than round storage LM-E to the d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	Int to pr ch diame TCEQ A ed date ntering 0.00 0.00	rovide a primary re eter access openin greed Order Docke of compliance. item (except for \$0 \$0 \$0	pof access opening of g for the Facility's g at No. 2016-1029-M r one-time avoide \$0 \$0 \$0	of not less than round storage LM-E to the d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	Int to pr ch diame TCEQ A ed date ntering 0.00 0.00 0.00	ovide a primary ro eter access openin greed Order Docke of compliance. item (except for \$0 \$0 \$0 \$0 \$0	pof access opening c g for the Facility's g et No. 2016-1029-M r one-time avoider \$0 \$0 \$0 \$0 \$0	of not less than round storage LM-E to the d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	Int to pr ch diamo TCEQ Ag ed date ntering 0.00 0.00 0.00 0.00 0.00	rovide a primary ro eter access openin greed Order Docke of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	pof access opening c g for the Facility's g et No. 2016-1029-M r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	of not less than round storage LM-E to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	Int to pr ch diamon TCEQ A ed date 0.000 0.000 0.000 0.000 0.000	ovide a primary re eter access openin greed Order Docke of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	pof access opening c g for the Facility's g et No. 2016-1029-M r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of not less than round storage LM-E to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	Int to pr ch diamo TCEQ Ag ed date ntering 0.00 0.00 0.00 0.00 0.00	rovide a primary ro eter access openin greed Order Docke of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	pof access opening c g for the Facility's g et No. 2016-1029-M r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	of not less than round storage LM-E to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	30 inches in tank, calc	diameter or an all ulated from the ef	ternative 30-in fective date of estimat	Int to pr ch diamon TCEQ A ed date 0.000 0.000 0.000 0.000 0.000	ovide a primary re eter access openin greed Order Docke of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	pof access opening c g for the Facility's g et No. 2016-1029-M r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of not less than round storage LM-E to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



		conomic	Benefit	Wo	rksheet		
Respondent	City of Dougla	ssville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437						
Media Violation No.	Public Water S 7	Supply				Percent Interest	Years of Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	<u>\$0</u> \$0	n/a n/a	\$0 \$0
Remediation/Disposal				0.00		li/d	
Dormit Costs					40	n/2	40
Permit Costs Other (as needed)						n/a n/a and up-to-date det	
Other (as needed) Notes for DELAYED costs	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l	\$24 maintain accurate Facility's ground st 5-1029-MLM-E to t	n/a and up-to-date det torage tank, calculat the estimated date o	\$24 ailed as-built ted from the of compliance.
Other (as needed)	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l No. 2016	\$24 maintain accurate Facility's ground st 6-1029-MLM-E to item (except for	n/a and up-to-date det torage tank, calculat the estimated date o r one-time avoide	\$24 ailed as-built ted from the of compliance. d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l No. 2010 tering	\$24 maintain accurate Facility's ground si 6-1029-MLM-E to item (except for \$0	n/a and up-to-date det torage tank, calculat the estimated date of r one-time avoide \$0	\$24 ailed as-built ted from the of compliance. d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l No. 2010 tering 0.00	\$24 maintain accurate Facility's ground si 5-1029-MLM-E to item (except for \$0 \$0	n/a and up-to-date det torage tank, calculat the estimated date of r one-time avoide \$0 \$0	\$24 ailed as-built ted from the of compliance. d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l No. 2010 tering 0.00 0.00	\$24 maintain accurate Facility's ground st 5-1029-MLM-E to 1 item (except for \$0 \$0 \$0 \$0	n/a and up-to-date det torage tank, calculat the estimated date of r one-time avoide \$0 \$0 \$0	\$24 ailed as-built ted from the of compliance. \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l No. 2016 tering 0.00 0.00 0.00	\$24 maintain accurate Facility's ground st 5-1029-MLM-E to to item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a and up-to-date det torage tank, calculat the estimated date of r one-time avoide \$0 \$0 \$0 \$0 \$0	\$24 ailed as-built ted from the of compliance. \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the No. 2016 tering 0.00 0.00 0.00 0.00 0.00	\$24 maintain accurate Facility's ground si 6-1029-MLM-E to 1 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and up-to-date det torage tank, calculat the estimated date of r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	\$24 ailed as-built ted from the of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l No. 2016 0.00 0.00 0.00 0.00 0.00 0.00	\$24 maintain accurate Facility's ground si 5-1029-MLM-E to item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and up-to-date det torage tank, calculat the estimated date of s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$24 ailed as-built ted from the of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the No. 2016 tering 0.00 0.00 0.00 0.00 0.00	\$24 maintain accurate Facility's ground si 6-1029-MLM-E to 1 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and up-to-date det torage tank, calculat the estimated date of r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	\$24 ailed as-built ted from the of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed plans or re effective dat	d costs include th cord drawings an e of TCEQ Agreed	e estimated am d specifications l Order Docket I	2.68 ount to for the l No. 2016 0.00 0.00 0.00 0.00 0.00 0.00	\$24 maintain accurate Facility's ground si 5-1029-MLM-E to item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a and up-to-date det torage tank, calculat the estimated date of s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$24 ailed as-built ted from the of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Scre	ening Date	13-May-2019	Docket No. 2019-0676-MLM-E	PCW
	R	espondent	City of Douglassville	Polic	Revision 4 (April 2014)
		ase ID No.		PCW	Revision March 26, 2014
Reg.	Ent. Ref	erence No.			
			Public Water Supply		
			Kaisie Hubschmitt		
	Viola	ation Number			ก
		Rule Cite(s)	5	0.41(c)(1)(A) and TCEQ Agreed Order Docket No. 2016-	
			1029-	MLM-E, Ordering Provision No. 2.g	
	Violatio	n Description	petroleum storage tank. Sp	ity's well at least 150 feet away from an underground becifically, the well is located approximately 73 feet from und petroleum storage tank serving a convenience store adjacent to the water plant.	
				Base Penalty	\$1,000
>> Env	vironme	ntal, Proper	ty and Human Health	ı Matrix	
			Harm		
00		Release	Major Moderate	Minor	
OR		Actual		Deveent 15 000	
		Potential	Х	Percent 15.0%	
>>Pro	aramma	tic Matrix			
	aa	Falsification	Major Moderate	Minor	
				Percent 0.0%	
			· · · · · · · · · · · · · · · · · · ·		_
	Matrix) feet from unsanitary surroundings could result in	
	Notes			expose persons served by the Facility to a significant	
		announ	t of pollutarits which would e	xceed levels that are protective of human health.	
				Adjustment \$850	1
					1
					\$150
Vieleti	F	-			
violatio	on Event	[S			
		Number of \	/iolation Events 22	655 Number of violation days	
			daily weekly monthly x quarterly semiannual annual single event	Violation Base Penalty	\$3,300
					ī
				nded, calculated from the effective date of TCEQ Agreed July 27, 2017, to the screening date, May 13, 2019.	
Good F	aith Effo	orts to Com	ply 0.0%	Reduction	\$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary		
			N/A <mark>x</mark>		
			Notes The Respon	dent does not meet the good faith criteria for this violation.	
				Violation Subtotal	\$3,300
Econor	nic Bene	fit (EB) for	this violation	Statutory Limit Test	
		Estimate	ed EB Amount	\$5,130 Violation Final Penalty Total	\$5,016
			This vie	olation Final Assessed Penalty (adjusted for limits)	\$5,016

	E	conomic	Benefit	Wo	rksheet		
Respondent		issville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437	7					
Media Violation No.	Public Water S 8	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l i i i i i i i i i i i i i i i i i i i						
Delayed Costs							
Equipment	[0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$25,000	27-Jul-2017	1-Jul-2020	2.93	\$244	\$4,886	\$5,130
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	away from u	Insanitary surroun Agreed Order Dock	dings or to obta ket No. 2016-10	ain an e)29-MLN	xception, calculate 1-E to the estimate	nsure it is located a d from the effective ed date of compliance one-time avoided	date of TCEQ e.
	ANNO	ALIZE avolueu C	USIS DEIDIE EI				
Disposal Personnel		╣─────┦		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0	<u>\$0</u> \$0
Supplies/Equipment				0.00	\$0 \$0	\$0	<u>\$0</u> \$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
		4			. .	ΨŬ	4 0
Notes for AVOIDED costs							

		ening Date		C	Docket No. 2019-0676-MLM-E	PCW
			City of Douglassville			Policy Revision 4 (April 2014)
Peg		Case ID No.	47278 RN101388437			PCW Revision March 26, 2014
Reg.	Liit. Kei		Public Water Supply			
	-		Kaisie Hubschmitt			
	Viola	ation Number				
		Rule Cite(s)	30 Tex. Admin. Co	de § 290.46(f)(2),	(f)(3)(A)(iii), (f)(3)(A)(vi), and (f)(3)(D)	l <mark>(ii)</mark>
			Failed to maintain w	vater works operation	on and maintenance records and make t	hem
					irector during the investigation. Specific	
	Violatio	n Description			by the Facility did not include locations o quent investigations. Additionally, the re	
		-	of inspections for	or all water storage	and pressure maintenance facilities and	1
			maintenance record		equipment and facilities were not availar review.	able
					Base Per	nalty \$1,000
>> Env	ironme	ntal. Prope	rty and Human H	lealth Matrix		
,, <u> </u>	in online.		H	larm		
OR		Release Actual	, , , , , , , , , , , , , , , , , , ,	derate Minor	7	
ÖK		Potential			Percent 0.0%	
>>Prog	gramma	tic Matrix Falsification	Major Moo	derate Minor		
				x	Percent 1.0%	
	Matrix		Less than 30'	% of the rule requir	rements were not met.	
	Notes					
					Adjustment	\$990
					Aujustment	\$990
						\$10
Violatio	on Event	ts				
		Number of \	/iolation Events	1	77 Number of violation days	
		Number of V		<u> </u>		
			daily			
			weekly monthly			
			quarterly		Violation Base Per	nalty \$10
			semiannual			
			annual	x		
			On	e single event is rea	commended	
			On	e single event is rec	commended.	
Good E	aith Eff	orte to Com	nlv	0.0%	Dedu	ction \$0
G000 F		orts to Com			EDPRP/Settlement Offer	ction \$0
			Extraordinary			
			Ordinary			
			N/A	x		
			Notes The		ot meet the good faith criteria for is violation.	
					Violation Sub	total \$10
Econom	vic Pore	fit (ED) for	this violation			
ECONOR	nc Bene		this violation		Statutory Limit Tes	
		Estimate	ed EB Amount	\$	0 Violation Final Penalty	Total \$15
			T	This violation Fina	al Assessed Penalty (adjusted for lir	mits) \$50

	E	conomic	Benefit	Wo	rksheet		
Respondent		ssville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437	,					
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$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
Others (************************************							
Other (as needed)	The dela	wed costs to main	tain water syst	0.00	\$0	n/a	\$0
Notes for DELAYED costs	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V	ration and mainter gency personnel a /iolation No. 1.	n/a nance records and m re included in the e	\$0 nake them conomic benefi
Notes for DELAYED costs Avoided Costs	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V	ration and mainter gency personnel a /iolation No. 1. item (except for	n/a nance records and m re included in the e	\$0 nake them conomic benefi d costs)
Notes for DELAYED costs Avoided Costs Disposal	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V ntering 0.00	ration and mainter gency personnel a (iolation No. 1. item (except for \$0	n/a nance records and m re included in the e r one-time avoide \$0	\$0 nake them conomic benefi d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V ntering 0.00	ation and mainter gency personnel a /iolation No. 1. item (except for \$0 \$0	n/a nance records and m re included in the e r one-time avoide \$0 \$0	\$0 nake them conomic benefi d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V tering 0.00 0.00 0.00	ation and mainter gency personnel a fiolation No. 1. item (except for \$0 \$0 \$0	n/a nance records and m re included in the e r one-time avoide \$0 \$0 \$0	\$0 nake them conomic benefi d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V tering 0.00 0.00 0.00 0.00	ration and mainter gency personnel a (iolation No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a nance records and m re included in the e r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 nake them conomic benefi d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V 0.00 0.00 0.00 0.00 0.00 0.00	ation and mainter gency personnel a (iolation No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a nance records and m re included in the e r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 nake them conomic benefi d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V itering 0.00 0.00 0.00 0.00 0.00	ation and mainter gency personnel a (iolation No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a nance records and m re included in the e r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 nake them conomic benefi d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V 0.00 0.00 0.00 0.00 0.00 0.00	ation and mainter gency personnel a (iolation No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a nance records and m re included in the e r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 nake them conomic benefi d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	immediately a	vailable for inspec	ction upon requ workshe	em oper est by a eet for V itering 0.00 0.00 0.00 0.00 0.00	ation and mainter gency personnel a (iolation No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a nance records and m re included in the e r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 nake them conomic benefi d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Scie	ening Date	13-May-2019	Docket No. 2019-0676-MLM-E	PCW
			City of Douglassville	Poli	cy Revision 4 (April 2014)
_	-	ase ID No.		PCW	Revision March 26, 2014
Reg.	Ent. Ref	ference No.			
	Fuf (Public Water Supply		
		ation Number	Kaisie Hubschmitt 10		
	VIUI	Rule Cite(s)	10		
		Rule elle(3)		30 Tex. Admin. Code § 290.46(s)(1)	
	Violatio	n Description	Failed to calibra	ate the Facility's well meter at least once every three years.	
				Base Penalty	y \$1,000
					· · · ·
>> Env	vironme	ntal, Proper	ty and Human	Health Matrix Iarm	
		Release		derate Minor	
OR		Actual			
		Potential		x Percent 3.0%	
		tic Matrix			
FI0	yı anını a	Falsification	Major Mo	derate Minor	
				Percent 0.0%	
					_
	Matrix			could result in inaccurate water usage and production data which	
	Notes	could expose p		e Facility to an insignificant amount of contaminants which would	d
			not exce	eed levels protective of human health.	
				Adjustment \$97	n
				Augustineine august	
					\$30
Violatio	on Even	F.a.			
Violatio					
		LS			
			/iolation Events	1 77 Number of violation days	
				1 77 Number of violation days	
			daily	1 77 Number of violation days	
			daily weekly	1 77 Number of violation days	
			daily weekly monthly		v \$30
			daily weekly	1 77 Number of violation days Violation Base Penalty	y \$30
			daily weekly monthly quarterly		y \$30
			daily weekly monthly quarterly semiannual		y \$30
			daily weekly monthly quarterly semiannual annual	Violation Base Penalt	y \$30
			daily weekly monthly quarterly semiannual annual single event	Violation Base Penalt	y \$30
			daily weekly monthly quarterly semiannual annual single event	Violation Base Penalt	y \$30
Good		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalty x	
Good F	aith Eff		daily weekly monthly quarterly semiannual annual single event Or	Violation Base Penalt	
Good F	aith Effo	Number of \	daily weekly monthly quarterly semiannual annual single event Or	Violation Base Penalty x ne single event is recommended. 0.0% Reduction	
Good F	aith Eff	Number of \	daily	Violation Base Penalty x ne single event is recommended. 0.0% Reduction]
Good F	aith Eff	Number of \	daily	Violation Base Penalty x ne single event is recommended. 0.0% Reduction	
Good F	aith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event or correct semiarce se	Violation Base Penalty x we single event is recommended. 0.0% Reduction NOE/NOV NOE/NOV to EDPRP/Settlement Offer x	
Good F	aith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event or correct semiarce se	Violation Base Penalty x Pe single event is recommended. O.0% Reduction NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Good F	aith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event or constrained by the semiannual single event or constrained by Before Extraordinary Ordinary N/A the semianned by	x Violation Base Penalty x Reduction 0.0% Reduction NOE/NOV NOE/NOV to EDPRP/Settlement Offer x Respondent does not meet the good faith criteria for	
Good F	aith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event or constrained by the semiannual single event or constrained by Before Extraordinary Ordinary N/A the semianned by	x Violation Base Penalty x Reduction 0.0% Reduction NOE/NOV NOE/NOV to EDPRP/Settlement Offer x Respondent does not meet the good faith criteria for	n \$0
		Number of \	daily weekly monthly quarterly semiannual annual single event or control of the semiannual single event of the semiannual semiannual single event of the semiannual	Image: Second state in the second s	n <u>\$0</u>
		Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event Or Ply Extraordinary Ordinary N/A Notes The this violation	Image: Statutory Limit Test	\$0 1 \$30
		Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event or control of the semiannual single event of the semiannual semiannual single event of the semiannual	Image: Second state in the second s	\$0 1 \$30
		Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event or contract of the semiannul single event of the semiannul s	Image: Statutory Limit Test	1 <u>\$0</u> 1 <u>\$30</u> 1 <u>\$46</u>

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	47278						
Media Violation No.	Public Water S 10	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs							
Avoided Costs	ANNU	ALIZE avoided c	osts before en		<u> </u>	r one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling	\$10	25-Feb-2016	13-May-2019	3.21	\$3	\$32	\$35
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						's well meter (\$31 p tigation to the date	
Approx. Cost of Compliance		\$32			TOTAL		\$35

S	creening Date	13-May-2019	Docket No. 2019-0676-MLM-E	PCW
		City of Douglassville		Policy Revision 4 (April 2014)
	Case ID No.			PCW Revision March 26, 2014
Reg. Ent.	Reference No.			
E		Public Water Supply		
	If. Coordinator			
	Rule Cite(s)			
	Rule cite(3)	30	Tex. Admin. Code § 290.46(m)	
Viol	ation Description	working condition and gene	nance and housekeeping practices to ensure the ral appearance of the system's facilities and equ ne Facility's well sealing block was cracked.	
				\$1,000
>> Environ	mental, Prope	rty and Human Health	Matrix	
	Release	Harm Major Moderate	Minor	
OR	Actual			
	Potential		x Percent 3.0%	
>>Program	matic Matrix			
	Falsification	Major Moderate	Minor Percent 0.0%	
			Percent 0.0%	
	Eailura to	ansura the good working cor	ndition and general appearance of the Facility ar	d its
Mat	rix equipment co		y the Facility to an insignificant amount of conta	
Not	ies		d levels protective of human health.	
	L			
			Adjustment	\$970
				\$30
				\$30
Violation Ev	vents			
	Number of V	Violation Events 1	77 Number of violation c	lays
		daily weekly monthly quarterly semiannual annual single event <u>x</u>	Violation Base	Penalty \$30
		One single	event is recommended.	
Good Faith	Efforts to Com	ply 0.0%	Я	Reduction \$0
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
		Extraordinary		
		Ordinary		
		N/A x	<u> </u>	
		Notes The Respon	dent does not meet the good faith criteria for this violation.	
			Violation	Subtotal \$30
				·
ECONOMIC B	enefit (EB) for	this violation	Statutory Limit	lest
	Estimate	ed EB Amount	\$9 Violation Final Pena	Ity Total \$46
	Estimate		\$9 Violation Final Pena	-

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Dougla	ssville					
Case ID No.							
Reg. Ent. Reference No.	RN101388437						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	. 15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$200	25-Feb-2019	1-Feb-2020	0.93	\$9	n/a	\$9
Notes for DELAYED costs		the date of	the investigati	on to th	e estimated date	well sealing block, c of compliance.	
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				<u>.</u>			
Approx. Cost of Compliance		\$200			TOTAL		\$9

		ening Date		Docket No. 2019-0676-MLM-E	PCW
		Respondent Case ID No.	City of Douglassville		Revision 4 (April 2014) Revision March 26, 2014
Reg.		ference No.			
			Public Water Supply		
	Enf. C		Kaisie Hubschmitt		
		V12 Rule Cite(s)	12		
		Rule elle(3)	30	Tex. Admin. Code § 290.43(c)(4)	
	Violatio	n Description		torage tanks with a liquid level indicator calibrated in feet ank site. Specifically, the liquid level indicator read in pounds per square inch.	
				Base Penalty	\$1,000
>> Env	vironme	ntal, Proper	rty and Human Health	n Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual			
		Potential		x Percent 3.0%	
>>Pro	aramma	tic Matrix			
	J. J	Falsification	Major Moderate	Minor	
				Percent 0.0%	
		Calluna ha u			
	Matrix			an appropriate liquid level indicator may not allow the nts for production and usage calculations. As a result,	
	Notes		ed by the Facility could be e>	posed to an insignificant amount of contaminants which	
			would not exceed I	evels protective of human health.	
				Adjustment \$970	
					\$30
Violati	on Event	ts			
		Number			
		Number of V	/iolation Events 1	Number of violation days	
			daily		
			weekly		
			monthly quarterly	Violation Base Penalty	\$30
			semiannual		450
			annual		
			single event x		
			One single	e event is recommended.	
		<u></u>		-	
Good F	aith Effo	orts to Com	ply 0.0% Before NOE/NOV	rieddetion	\$0
			Extraordinary		
			Ordinary		
			N/A x		
			Notes The Respon	dent does not meet the good faith criteria for this violation.	
				Violation Subtotal	\$30
Econor	nic Bong	fit (EB) for	this violation	Statutory Limit Test	+00
LCOHOL	nic belle	TUL (ED) IOF		Statutory Limit rest	
		Estimate	ed EB Amount	\$36 Violation Final Penalty Total	\$46

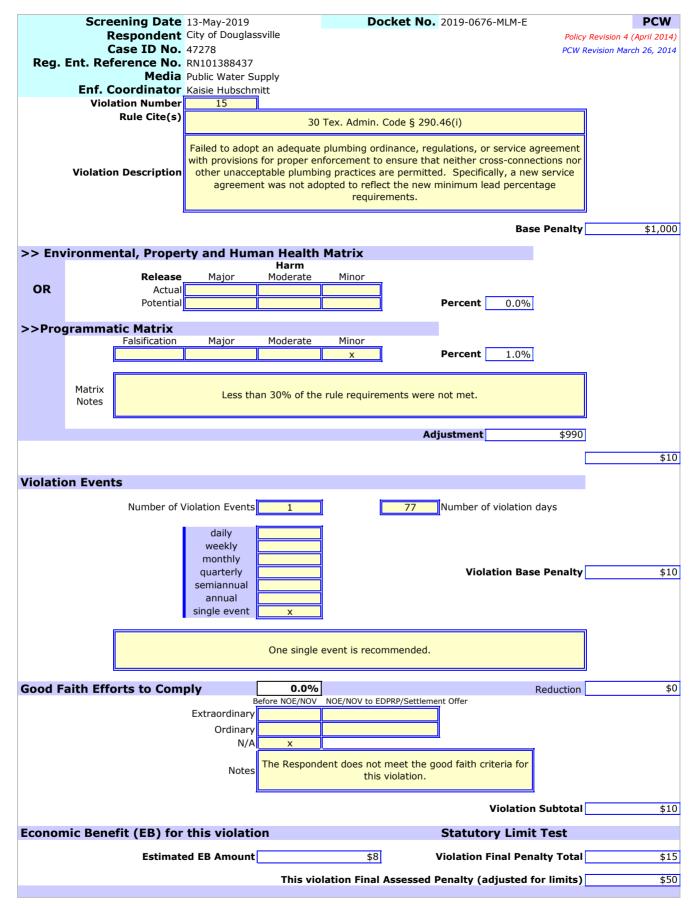
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Dougla	ssville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	\$500	25-Feb-2019	1-Mar-2020	1.01	\$2	\$34	\$36
Buildings	<i></i>		1 1101 2020	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 Avoided Costs	site	, calculated from	the date of the	investig	ation to the estim	ate liquid level indica ated date of complia	ance.
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$500			TOTAL		\$36

		ening Date		Docket No. 2019-0676-MLM-E	PCW
		lespondent Case ID No.	City of Douglassville		Revision 4 (April 2014)
Rea			47278 RN101388437	PCW K	evision March 26, 2014
negi			Public Water Supply		
	Enf. C	Coordinator	Kaisie Hubschmitt		
	Viola	ation Number	13		
		Rule Cite(s)	30) Tex. Admin. Code § 290.42(j)	
			Failed to onsure that all che	emicals and any additional or replacement process media	
	Violatio	n Description	used in treatment of water s National Standards Institute 60 for Drinking Water Treat	e/National Sanitation of drinking water was not available.	
				Base Penalty	\$1,000
>> Env	vironme	ntal, Propei	ty and Human Health	n Matrix	
		Release	Harm		
OR		Actual	Major Moderate	Minor	
5.		Potential		x Percent 3.0%	
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix Notes		e Facility to an insignificant a	that meets ANSI/NSF standards could expose persons amount of contaminants which would not exceed levels tive of human health.	
				Adjustment \$970	
					\$30
					004
Violati	on Even	ts			
		Number of \	/iolation Events 1	77 Number of violation days	
			daily		
			weekly monthly	-	
			quarterly	Violation Base Penalty	\$30
			semiannual		
			annual single event x	4	
			<u></u>	<u></u>	
				e event is recommended.	
Good F	aith Fff	orts to Com	One single	7	0¢
Good F	aith Effo	orts to Com	One single ply 0.0% Before NOE/NOV	Reduction	\$0
Good F	aith Effo	orts to Com	One single One single Ply 0.0% Before NOE/NOV Extraordinary	Reduction	\$0
Good F	aith Effe	orts to Com	One single One single Ply One single Before NOE/NOV Extraordinary Ordinary Ordinary	Reduction	\$0
Good F	aith Effe	orts to Com	One single One single Ply 0.0% Before NOE/NOV Extraordinary Ordinary N/A x	Reduction	\$0
Good F	aith Effo	orts to Com	One single One single Before NOE/NOV Extraordinary Ordinary N/A x The Respon	Reduction NOE/NOV to EDPRP/Settlement Offer	\$0
			One single Ply 0.0% Before NOE/NOV Extraordinary Ordinary N/A x Notes The Respon	Reduction NOE/NOV to EDPRP/Settlement Offer dent does not meet the good faith criteria for this violation. Violation Subtotal	\$0
			One single One single Before NOE/NOV Extraordinary Ordinary N/A x The Respon	NOE/NOV to EDPRP/Settlement Offer Image: Constraint of the set of t	· · · · · ·
		efit (EB) for	One single Ply 0.0% Before NOE/NOV Extraordinary Ordinary N/A x Notes The Respon	Reduction NOE/NOV to EDPRP/Settlement Offer dent does not meet the good faith criteria for this violation. Violation Subtotal	\$30
		efit (EB) for	One single One single Before NOE/NOV Extraordinary Ordinary N/A x Notes The Response this violation ed EB Amount	Reduction NOE/NOV to EDPRP/Settlement Offer dent does not meet the good faith criteria for this violation. Violation Subtotal Statutory Limit Test	\$30

	E	conomic	Benefit	Wo	rksheet		
Respondent		ssville					
Case ID No.							
Reg. Ent. Reference No.	RN101388437	,					
Media Violation No.	Public Water S 13	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$45	25-Feb-2019	1-Feb-2020	0.93	\$2	n/a	\$2
Notes for DELAYED costs	replacem ANSI/NSF s	ent process media tandards, calculat	used in treatm ed from the dat	ent of v e of the	vater supplied by p investigation to t	hemicals and any ac public water system he estimated date o	conform to f compliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before er		<u> </u>	one-time avoide	
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	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0	\$0
Other (as needed)							
Other (as needed)				0.00	\$0	\$0	\$0
Other (as needed) Notes for AVOIDED costs		JJ		0.00	50	<u>\$0</u>	\$U

	Scre	ening Date	13-May-2019	Docket No.	2019-0676-MLM-E	PCW
		•	City of Douglassville		Polic	y Revision 4 (April 2014)
_		ase ID No.			PCW	Revision March 26, 2014
Reg.	Ent. Ref		RN101388437			
			Public Water Supply			
			Kaisie Hubschmitt			
	Viola	ation Number	14			ล
		Rule Cite(s)	30	Tex. Admin. Code § 290.42	(e)(5)	
	Violatio	n Description	protect it from adverse w	chlorination solution contair eather conditions and vanda rite was sitting outside the f	alism. Specifically, a drum of	\$1,000
	_				Buserenury	\$1,000
>> Env	vironme	ntal, Prope	rty and Human Healt	h Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual				
• · · ·		Potential			Percent 3.0%	
			<u> </u>			
>>Pro	gramma	tic Matrix				
		Falsification	Major Moderate	Minor		
					Percent 0.0%	
						-
	Motrix	Failure to pro	perly house the hypochlorin	ation solution container in a	secure enclosure could cause	
	Matrix Notes	persons ser		oosed to an insignificant amo		
	Notes		would not exceed	levels protective of human h	nealth.	
						-
				Adju	stment \$970	
						\$30
						\$30
Violati	on Event	ts				
		Number of V	/iolation Events 1	77	Number of violation days	
			daily weekly monthly quarterly		Violation Base Penalty	\$30
			semiannual			
			annual			
			single event <u>x</u>			
						7
			One singl	e event is recommended.		
Cood	aith Eff	when the Course	mby 0.00	4		*0
900a F	aith Effe	orts to Com	Before NOE/NO		Reduction	\$0
			Extraordinary		t onei	
			Exter dor diritar y			
			Ordinary			
			Ordinary			
			Ordinary N/A			
			N/A x	ndent does not meet the goo this violation.	od faith criteria for	
				-	od faith criteria for Violation Subtotal	\$30
Econor	nic Bene	fit (EB) for		this violation.		\$30
Econor	mic Bene		N/A × Notes The Respo	this violation.	Violation Subtotal	
Econor	mic Bene		N/A × Notes The Respo	this violation.	Violation Subtotal	\$46

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.		issville					
		7					
teg. Ent. Reference No. Media Violation No.	Public Water S					Percent Interest	Years of Depreciation
						5.0	. 1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	L						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$100	25-Feb-2019	1-Feb-2020	0.93	\$0 \$5	n/a n/a	\$0 \$5
Other (as needed) Notes for DELAYED costs	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather o the esti	\$0 \$5 house the hypoch conditions and van mated date of com	n/a n/a lorination solution co dlism, calculated fro upliance.	\$0 \$5 ontainer in a om the date of
Other (as needed) Notes for DELAYED costs Avoided Costs	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather o the esti	\$0 \$5 house the hypoch conditions and van mated date of com item (except for	n/a n/a lorination solution co dlism, calculated fro upliance.	\$0 \$5 ontainer in a om the date of d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather o the esti tering 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0	n/a n/a lorination solution co dlism, calculated fro upliance. rone-time avoided \$0	\$0 \$5 ontainer in a om the date of d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather o the esti tering 0.00 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0 \$0	n/a n/a lorination solution co dlism, calculated fro upliance.	\$0 \$5 ontainer in a om the date of d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather of the esting 0.00 0.00 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a orination solution co dlism, calculated fro upliance.	\$0 \$5 ontainer in a om the date of d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather of the esti 0.00 0.00 0.00 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orination solution co dlism, calculated fro pliance. one-time avoided \$0 \$0 \$0 \$0 \$0	\$0 \$5 ontainer in a om the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather of the esti 0.00 0.00 0.00 0.00 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orination solution co dlism, calculated fro pliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$5 ontainer in a om the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather of the esti 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a lorination solution co dlism, calculated fro upliance. cone-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$5 ontainer in a om the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather of the esti 0.00 0.00 0.00 0.00 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orination solution co dlism, calculated fro pliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$5 ontainer in a om the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delaye secure enclo	ed costs include the sure to protect it is the in	e estimated am from adverse w nvestigation to	0.93 ount to eather of the esti 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$5 house the hypoch conditions and van mated date of com item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a lorination solution co dlism, calculated fro upliance. cone-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$5 ontainer in a om the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	Ε	conomic	Benefit	Wo	rksheet		
Respondent	City of Dougla	issville					
Case ID No.	47278						
leg. Ent. Reference No.	RN101388437	7					
	Public Water S					Percent Interest	Years of Depreciation
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	Γ	1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0	\$0	<u>\$0</u> \$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$180	25-Feb-2019	1-Feb-2020	0.93	\$8	n/a	\$8
Training/Sampling			1.05 2020	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	service agr	reement, calculate	d from the date	e of the	investigation to th	e estimated date of	compliance.
	ANNO	ALIZE avolueu C	USIS DEIDIE EI	0.00	\$0	\$0	\$0
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
rersonner nspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$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
()		-n		0.00			**
Notes for AVOIDED costs							

		ening Date		Docket No.	2019-0676-MLM-E	PCW
		ase ID No.	City of Douglassville			icy Revision 4 (April 2014) / Revision March 26, 2014
Reg.		erence No.			<i>FCV</i>	r Revision March 20, 2014
		Media	Public Water Supply			
	-		Kaisie Hubschmitt			
	Viola	ation Number	16			-
		Rule Cite(s)	30 1	ex. Admin. Code § 290.4	43(d)(2)	
	Violatio	n Description	Failed to provide the Fa	cility's pressure tank with	a pressure release device.	
					Base Penalt	y \$1,000
>> Env	/ironmei	ntal, Proper	ty and Human Health	Matrix		
			Harm			
OR		Release Actual	Major Moderate	Minor		
		Potential	X		Percent 15.0%	
			1	<u> </u>		
>>Prog	gramma	tic Matrix	Maian Mada	Minou		
		Falsification	Major Moderate	Minor	Percent 0.0%	
				<u>I</u>		
	Matrix Notes				ank could result in excess minants which would exceed	
				Ad	ljustment \$85	0
						\$150
Violatio	on Event	s				
		Number of \	/iolation Events 3	77	Number of violation days	
			daily]		
			weekly			
			monthly <u>x</u> quarterly		Violation Base Penalt	y \$450
			semiannual	1	Violation base Penale	Υ 4 50
			annual			
			single event]		
		Three month	, , , , , , , , , , , , , , , , , , , ,	calculated from the date screening date, May 13,	of the investigation, February 2019.	
Good F	aith Effo	orts to Com	ply 0.0%		Reductio	n \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlem		
			Extraordinary			
			Ordinary			
			N/A × Notes The Respon	dent does not meet the g this violation.	pood faith criteria for	
			·		Violation Subtota	al \$450
Econon	nic Bene	fit (EB) for	this violation		Statutory Limit Test	
		Estimate	ed EB Amount	\$54	Violation Final Penalty Tota	al \$684
			This vie	lation Final Accessed	Penalty (adjusted for limits	¢£01
				nation rinal Assessed	Penalty (adjusted for limits	\$684

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Dougla	ssville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment	\$700	25-Feb-2019	1-Apr-2020	1.10	\$3	\$51	\$54
Buildings	\$700	23160 2019		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$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	(\$700 per	device), calculated	d from the date	of the	investigation to the	lease device on the e estimated date of one-time avoide	compliance.
AVOIDED COSLS Disposal			USUS DEIVIE EI	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$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		\$700			TOTAL		\$54

		ening Date	13-May-2019 City of Douglassville	Docket No. 2019-0676-MLM-E	PCW
		Case ID No.			Policy Revision 4 (April 2014) PCW Revision March 26, 2014
Reg.		erence No.			CW (CV/5/0// / M/C// 20, 2017
		Media	Public Water Supply		
			Kaisie Hubschmitt		
	Viola	ation Number			
		Rule Cite(s)		0.46(v) and TCEQ Agreed Order Docket No. 2016-10	29-
			MLr	1-E, Ordering Provision No. 2.a.vi	
	Violatio	n Description	local or national electrical c	lectrical wiring is securely installed in compliance with ode. Specifically, the electrical wiring at the well was securely installed in a conduit.	
				Base Pen	alty \$1,000
>> Env	vironme	ntal, Proper	ty and Human Health	n Matrix	
			Harm		
OR		Release Actual	Major Moderate	Minor	
UN		Potential		Percent 15.0%	
			I <u> </u>		
>>Pro	gramma	tic Matrix			
		Falsification	Major Moderate	Minor	
				Percent 0.0%	
		– – – – –			
	Matrix			compliance with a local or national code may cause ose persons served by the Facility to contaminants w	hich
	Notes	equipment ma		vels protective of human health.	
				Adjustment	850
					+150
					\$150
Violati	on Even	ts			
		Number of V	/iolation Events 22	655 Number of violation days	
			daily weekly monthly x quarterly semiannual annual single event	Violation Base Pen	alty\$3,300
				nded, calculated from the effective date of TCEQ Agr July 27, 2017, to the screening date, May 13, 2019.	eed
Good F	aith Effo	orts to Com	ply 0.0%	Reduc	tion \$0
			Before NOE/NOV		
			Extraordinary		
			Ordinary		
			N/A <u>x</u>	<u></u>	
			Notes The Respon	dent does not meet the good faith criteria for this violation.	
				Violation Subt	otal \$3,300
Econor	mic Bene	efit (EB) for	this violation	Statutory Limit Tes	t
			ed EB Amount	\$63 Violation Final Penalty T	
			<u> </u>	, ·	
			This vi	olation Final Assessed Penalty (adjusted for lim	iits) \$5,016

	E	conomic	Benefit	Wo	rksheet		
Respondent		issville					
Case ID No.	47278						
Reg. Ent. Reference No.	RN101388437	7					
Media Violation No.	Public Water S	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment	· · · · · · · · · · · · · · · · · · ·			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$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)	\$500	27-Jul-2017	1-Feb-2020	2.52	\$63	n/a	\$63
	The delayed	costs include the		int to e		ig is installed in acco	ordance with a
Notes for DELAYED costs			29-MLM-E to th	e estim	ated date of comp	liance.	cket No. 2016-
Avoided Costs		10	29-MLM-E to th	e estim	ated date of comp	liance.	cket No. 2016- d costs)
Avoided Costs Disposal		10	29-MLM-E to th	e estimatering	ated date of comp item (except for \$0	liance. r one-time avoide \$0	cket No. 2016- d costs) \$0
Avoided Costs Disposal Personnel		10	29-MLM-E to th	e estim tering 0.00 0.00	ated date of comp item (except for \$0 \$0	iance. one-time avoide \$0 \$0	cket No. 2016- d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		10	29-MLM-E to th	e estim tering 0.00 0.00 0.00	ated date of comp item (except for \$0 \$0 \$0	iance. one-time avoide \$0 \$0 \$0 \$0	cket No. 2016- d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment		10	29-MLM-E to th	e estimation 0.00 0.00 0.00 0.00	ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0	liance. • one-time avoide \$0 \$0 \$0 \$0 \$0	cket No. 2016- d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		10	29-MLM-E to th	e estim tering 0.00 0.00 0.00 0.00 0.00	ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2016- d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		10	29-MLM-E to th	e estim tering 0.00 0.00 0.00 0.00 0.00 0.00	ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2016- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		10	29-MLM-E to th	e estim tering 0.00 0.00 0.00 0.00 0.00	ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2016- d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		10	29-MLM-E to th	e estim tering 0.00 0.00 0.00 0.00 0.00 0.00	ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2016- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

THE DIMENTAL OF	Policy R	Pe evision 5 (January 28	•	alculatio	n Worksł	neet (PC		vision February	/ 11, 2021
DATES		12-Sep-2022	Concering	21 Can 2022	EPA Due]		
	PCW	12-Oct-2022	Screening	21-Sep-2022	EPA Due				
RESPO	NDENT/FACILI	TY INFORMATI							1
Reg	g. Ent. Ref. No.		sville						
Facili	ty/Site Region	5-Tyler			Major/M	linor Source	Minor		
CASE I	NFORMATION								
En	f./Case ID No.				No. c	of Violations]
Med	Docket No. lia Program(s)	2019-0676-MLM			Government	Order Type			
Meu		Public Water Su					Kaisie Hubsch	mitt	
A	uin Develoy & I		¢0		*F 000	EC's Team	Enforcement 1	Feam 5	
Adr	nin. Penalty \$ I		\$0	Maximum	\$5,000				
			Penalt	v Calcula	tion Section	on			
ΤΟΤΑ	L BASE PENA	LTY (Sum of					Subtotal 1		\$500
		_		_	_			ļ	•
ADJU	Subtotals 2-7 are of	/-) IO SUBI otained by multiplyin	DIAL 1 g the Total Base I	Penalty (Subtotal 1) by the indicated p	ercentage.			
	Compliance Hi			22.0%	Adjustment		tals 2, 3, & 7		\$110
	Notes	Enhancement		d order contair vith dissimilar v	ning a denial of violations.	liability and			
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Re	espondent doe	es not meet the	culpability crite	eria.			
	Good Faith Eff	ort to Comply 1	otal Adjustn	nents			Subtotal 5		\$0
	Economic Ben	efit		0.0%	Enhancement*		Subtotal 6		\$0
	Estimated	Total EB Amounts Cost of Compliance		*Cappe	d at the Total EB \$ /	Amount			
SUM (OF SUBTOTA	LS 1-7				E	inal Subtotal		\$610
OTHE	R FACTORS A			IDE	0.0%		Adjustment		\$0
Reduces of	or enhances the Final	Subtotal by the indi	cated percentage		0.078		Aujustment		ΨU
	Nataa								
	Notes								
						Final Pen	alty Amount		\$610
CTATI	UTORY LIMIT		NT			Final Acco	acad Danalty		\$610
STAT						rinai Asse	ssed Penalty		\$010
DEFER					0.0%	Reduction	Adjustment		\$0
Reduces t	he Final Assessed Pe	nalty by the indicate	d percentage.]		
	Notes	Defe	rral not offere	ed for non-expe	edited settlemen	ıt.			
ΡΔΥΔ	BLE PENALT	Y							\$610
AIA		-							4010

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

Respondent
Case ID No.City of Douglassville
47278Reg. Ent. Reference No.RN101388437

Screening Date 21-Sep-2022

Media Public Water Utilities

Enf. Coordinator Kaisie Hubschmitt

Compliance History Worksheet

Component	tory <i>Site</i> Enhancement (Subtotal 2) Number of	Number	Adjust
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	1	2%
	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
other	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment Per	centage (Sul	btotal 2

	N/A	Adjustment Percentage (Subtotal	/ 3) 0%
>>	Compliance Histo	Person Classification (Subtotal 7)	
	Unclassif	Adjustment Percentage (Subtotal	17) 0%
>>	Compliance Histo	Summary	
	Compliance History Notes	Enhancement for one agreed order containing a denial of liability and one NOV with dissimilar violations.	
		Total Compliance History Adjustment Percentage (Subtotals 2, 3, &	7) 22%
>> F	Final Compliance H		
		Final Adjustment Percentage *capped at 10	0% 22%

PCW

Docket No. 2019-0676-MLM-E

PCW 2 of 2

		ening Date		Docket	No. 2019-0676-MLM-E		PCW
			City of Douglassville				evision 5 (January 28, 2021)
D		ase ID No.				РСИ	/ Revision February 11, 2021
Reg.	Ent. Ref		RN101388437				
	Enf (Public Water Utilities Kaisie Hubschmitt				
		tion Number					
	Tion		<u>"</u>				
		Rule Cite(s)	Te	x. Water Code § 13	.1394(b)(2)		
					proval an emergency prepa		
	Violatio	n Description	plan ("EPP") that demo	onstrates the Facility operations	y's ability to provide emerg	ency	
				operations	ı		
					Base	Penalty	\$5,000
					Buse	I charcy	43/000
>> Env	vironme	ntal, Prope	rty and Human Healt	h Matrix			
		Release	Harm Major Moderate	Minor			
OR		Actual					
-		Potential			Percent 0.0%		
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor			
		Faisincation	Major Moderate		Percent 10.0%		
	Matrix Notes		100% of the rul	e requirements wer	e not met.		
	Notes						
						+4 500	
					Adjustment	\$4,500	
						[\$500
Violati	on Even	te					
Violatio		.5					
		Number of V	/iolation Events <u>1</u>	1	2 Number of violation of vio	lays	
			de ilu				
			daily weekly	_			
			monthly				
			quarterly		Violation Base	Penalty	\$500
			semiannual				
			annual				
			single event x				
			One single	event is recommer	ided.		
Good F	aith Eff	orts to Com	ply 0.0%	6	R	eduction	\$0
			Before NOE/NOV				
			Extraordinary				
			Ordinary				
			N/A <mark>x</mark>				
			Notes The Respo	ndent does not mee	et the good faith criteria		
			Notes	for this viol	ation.		
			<u> </u>				
					Violation S	Subtotal	\$500
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	Test	
				+0			+610
		Estimate	ed EB Amount	\$8	Violation Final Penal	ty Iotal	\$610
			This viol	ation Final Assess	sed Penalty (adjusted fo	r limits)	\$610

	E	conomic	Benefit	Nor	ksheet		
Respondent Case ID No.	47278						
Reg. Ent. Reference No. Media Violation No.	Public Water U					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs							
Other (as needed)	\$180	9-Sep-2022	8-Aug-2023	0.00 0.91	\$0 \$8	n/a n/a	\$0 \$8
Other (as needed) Notes for DELAYED costs	The delayed	cost includes the strates the Facility	estimated amou 's ability to prov	0.91 unt to de vide eme	\$8 evelop and submit	n/a to the TCEQ for ap s, calculated from th	\$8 proval an EPP
	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de vide eme e estim	\$8 evelop and submit ergency operations ated date of comp	n/a to the TCEQ for ap s, calculated from th	\$8 proval an EPP he date of the
Notes for DELAYED costs	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de vide eme e estim	\$8 evelop and submit ergency operations ated date of comp	n/a to the TCEQ for ap s, calculated from th liance.	\$8 proval an EPP ne date of the
Notes for DELAYED costs Avoided Costs	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de vide eme e estima tering	\$8 evelop and submit ergency operations ated date of comp item (except for	n/a to the TCEQ for ap s, calculated from th liance. one-time avoided \$0 \$0	\$8 proval an EPP he date of the date of the s0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de vide eme e estim tering 0.00	\$8 evelop and submit ergency operations ated date of comp item (except for \$0	n/a to the TCEQ for ap s, calculated from th liance. one-time avoided \$0 \$0 \$0	\$8 proval an EPP be date of the i costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de vide eme e estima tering 0.00	\$8 evelop and submit ergency operations ated date of comp item (except for \$0 \$0	n/a to the TCEQ for ap s, calculated from th liance. one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	\$8 proval an EPP he date of the date of the s0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de e estime tering 0.00 0.00 0.00 0.00 0.00	\$8 evelop and submit ergency operations ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a to the TCEQ for ap s, calculated from th liance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$8 proval an EPP be date of the date of the s0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de vide eme e estim- tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$8 evelop and submit ergency operations ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a to the TCEQ for ap s, calculated from th liance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$8 proval an EPP be date of the date of the s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de e estime tering 0.00 0.00 0.00 0.00 0.00	\$8 evelop and submit ergency operations ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a to the TCEQ for ap s, calculated from th liance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$8 proval an EPP be date of the date of the s0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed that demons	cost includes the strates the Facility rec	estimated amou 's ability to prov ord review to th	0.91 unt to de vide eme e estim- tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$8 evelop and submit ergency operations ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a to the TCEQ for ap s, calculated from th liance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$8 proval an EPP be date of the date of the s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

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Compliance History Report

Compliance History Report for CN600658322, RN101388437, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator:	CN600658322, City of Douglassville	Classification: NOT APPLICABL	LE Rating: N/A
Regulated Entity:	RN101388437, CITY OF DOUGLASSVILLE	Classification: NOT APPLICABI	LE Rating: N/A
Complexity Points:	N/A	Repeat Violator: N/A	
CH Group:	14 - Other		
Location:	LOCATED AT HWY 8 AND HWY 77 IN C	ASS CO CASS, TX, CASS COUNTY	
TCEQ Region:	REGION 05 - TYLER		
ID Number(s): PUBLIC WATER SYSTEM/S 0340015	SUPPLY REGISTRATION		
Compliance History Per	iod: September 01, 2015 to August 31	L, 2020 Rating Year: 2020 R	Rating Date: 09/01/2020
Date Compliance Histor	y Report Prepared: June 25, 202	4	
Agency Decision Requir	ing Compliance History: Enforce	ement	
Component Period Sele	cted: May 22, 2016 to May 21, 2021		
TCEQ Staff Member to C	Contact for Additional Information	on Regarding This Compliance Hi	story.
Name: TCEQ Staff Me	mber	Phone: (512) 239-1000	
<u>Components (Multim</u> A. Final Orders, court j	change in ownership/operator of the site edia) for the Site Are Listed i udgments, and consent decrees	n Sections A - J	IO
1 Effective Date: 0	7/27/2017 ADMINORDER 2 Denial)	2016-1029-MLM-E (Findings Order-Agre	eed Order Without
Classification:	,		
	AC Chapter 290, SubChapter D 290.46(
	AC Chapter 290, SubChapter D 290.46(
	AC Chapter 290, SubChapter D 290.46(AC Chapter 290, SubChapter D 290.46(
Rqmt Prov: 2.a.			
Description: Fa	ilure to properly maintain water works on executive Director during the investigation of the	pperation and maintenance records and r ation.	nake them available
Citation: 30 T	AC Chapter 290, SubChapter D 290.46(m)(1)(B)	
Rqmt Prov: 2.a.			
Description: Fa years. Classification:	·	pressure tank provided with an inspectio	n port every five
	AC Chapter 290, SubChapter D 290.41(c)(1)(F)	
Rqmt Prov: 2.e.		ent that covers the land within 150 feet c	of the Facility's woll
Classification:	,		n the facility's well.
Citation: 30 T	AC Chapter 290, SubChapter D 290.43(c)(8)	

Description: Failure to ensure that all clearwells, ground storage tanks, standpipes, and elevated tanks are painted, disinfected, and maintained in strict accordance with current American Water Works Association ("AWWA") standards.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)

Description: Failure to post a legible sign at the Facility's production, treatment, and storage facilities that contains the name of the Facility and emergency telephone numbers where a responsible official can be contacted. Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(1)

Description: Failure to measure the free chlorine residual within the distribution system with a colorimeter, spectrophotometer, or a color comparator.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.43(d)(3)

Description: Failure to provide a device to readily determine the air-water-volume for the pressure tank.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.121(a)

30 TAC Chapter 290, SubChapter F 290.121(b)

Description: Failure to maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements.

Classification: Minor

Citation: 2B TWC Chapter 11, SubChapter A 11.1272(c)

30 TAC Chapter 288, SubChapter B 288.20(a)

30 TAC Chapter 288, SubChapter C 288.30(5)(B)

Rqmt Prov: 2013-1425-MLM-E ORDER

Description: Failure to adopt a drought contingency plan which includes all elements for municipal use by a retail public water supplier.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(1)(A)

Description: Failure to failed to locate the Facility's well at least 150 feet from an underground petroleum storage tank.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(v)

Description: Failure to ensure that all electrical wiring is securely installed in compliance with a local or national electrical code.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(2)

Description: Failure to provide the primary roof access opening of not less than 30 inches in diameter if an alternative 30-inch diameter access opening is not provided in the Facility's ground storage tank. Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)

Description: Failure to maintain accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank at the Facility.

Effective Date: 09/24/2019 ADMINORDER

ADMINORDER 2018-1156-PWS-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

2

Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(A)

30 TAC Chapter 290, SubChapter F 290.110(b)(4)

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: Failure to maintain a free chlorine residual of 0.2 mg/L in the distribution at all times. Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(2)

Description: Failure to ensure that the Facility's ground storage tank ("GST") roof hatches remain locked except during inspections and maintenance. Specifically, the roof hatch for the Facility's GST did not have a lock. 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 Facility grounds had weeds and shrubs growing up around the tanks and pump house.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.42(b)(6)

Description: Failure to provide sampling taps for raw water, treated water, and at a point representing water entering the distribution system at every entry point. Specifically, the well head did not have a raw water sample *Compliance History Report for CN600658322, RN101388437, Rating Year 2020 which includes Compliance History (CH) components from May 22, 2016, through May 21, 2021.* tap.
Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.46(I)
Description: Failure to flush all dead-end mains more often than monthly intervals if water quality complaints are received from water customers or if disinfectant residuals fall below acceptable levels.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.): $_{N/A} \label{eq:N/A}$

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

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

1	Date: 07/07/2020 (1657000)		
	Self Report? NO	Classification:	Minor
	Citation:30 TAC Chapter 290, SubChapter D 290.42(Description:Failure to secure the water treatment plant bperiods of darkness and when the plant is ur	by locking the ga	tes during
2	Date: 02/25/2021 (1700538)		
	Self Report? NO	Classification:	Moderate
	Citation: 30 TAC Chapter 290, SubChapter F 290.104	(f)(2)	
	Description: Failure to maintain a disinfectant residual of distribution system.	0.20 mg / L (Fre	e Chlorine) in
	Self Report? NO	Classification:	Moderate
	Citation:30 TAC Chapter 290, SubChapter D 290.41(Description:Failure to have treatment plant locked and soSelf Report?NO	, , , , , ,	nt is unattended. Moderate
	Citation:30 TAC Chapter 290, SubChapter D 290.46(Description:Failure to conduct an interior inspection of prSelf Report?NO	,,,,,,,	revious 5 years. Minor
	Citation:30 TAC Chapter 290, SubChapter D 290.46(Description:Failure to have a disinfectant residual analyz calibration.	/ / / /	verified by

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs): N/A

H. Voluntary on-site compliance assessment dates: $$\rm N/A$$

I. Participation in a voluntary pollution reduction program: \$N/A\$

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING CITY OF DOUGLASSVILLE; RN101388437

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER

DOCKET NO. 2019-0676-MLM-E

On _______, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding City of Douglassville ("Respondent") under the authority of Tex. HEALTH & SAFETY CODE ch. 341, Tex. WATER CODE ch. 13, and 30 Tex. ADMIN. CODE chs. 70 and 290. The Executive Director of the TCEQ, represented by the Litigation Division, and Respondent presented this Order to the Commission.

Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, to request an evidentiary hearing, receive notice of an evidentiary hearing, and a right to appeal. By entering into this Order, Respondent agrees to waive all notice and procedural rights which might otherwise be authorized or required in this action.

It is further understood and agreed that 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. The duties and responsibilities imposed by this Order are binding upon Respondent.

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

FINDINGS OF FACT

1. Respondent owns and operates a public water system ("PWS") located at the intersection of State Highway 8 and State Highway 77 in Douglassville, Cass County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 88 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a PWS as defined in 30 Tex. ADMIN. CODE § 290.38.

The PWS is also a retail public utility, exempt utility, or provider or conveyor of potable or raw water services, operated for compensation, that furnishes water service to more than one customer and is not located in a county with a population of 3.3 million or more or in a county with a population of 550,000 or more adjacent to a county with a population of 3.3 million or more. The PWS is an "affected utility" as defined in Tex. WATER CODE § 13.1394(a)(1).

- 2. During an investigation conducted on and around February 25, 2019, an investigator documented that Respondent:
 - a. Failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation. Specifically, the disinfectant residual monitoring records and Customer Service Inspections were not available. Additionally, several months of the microbiological analyses records were missing;
 - b. Failed to inspect the interior surface of a pressure tank provided with an inspection port every five years;

- c. Failed to maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements. Specifically, the monitoring plan lacked locations and information on distribution chlorine sample sites;
- d. Failed to ensure that all clearwells, ground storage tanks, standpipes, and elevated tanks are painted, disinfected, and maintained in strict accordance with current American Water Works Association ("AWWA") standards. Specifically, the exterior, roof, and hatch of the Facility's ground storage tank were corroded;
- e. Failed to provide a device to readily determine the air-water-volume for the pressure tank;
- f. Failed to provide a primary roof access opening of not less than 30 inches in diameter if an alternative 30-inch diameter access opening is not provided in the Facility's ground storage tank. Specifically, neither one of the two access openings of the Facility's ground storage tank were at least 30 inches in diameter;
- g. Failed to maintain accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank at the Facility. Specifically, no as-built plans and specifications for the ground storage tank were available;
- h. Failed to locate the Facility's well at least 150 feet away from an underground petroleum storage tank. Specifically, the well is located approximately 73 feet from the fill riser of an underground petroleum storage tank serving a convenience store adjacent to the water plant;
- i. Failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation. Specifically, the records of complaints received by the Facility did not include locations of complaints and the results of any subsequent investigations. Additionally, the results of inspections for all water storage and pressure maintenance facilities and maintenance records for water system equipment and facilities were not available for review;
- j. Failed to calibrate the Facility's well meter at least once every three years;
- k. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, the Facility's well sealing block was cracked;
- l. Failed to provide all water storage tanks with a liquid level indicator calibrated in feet of water located at the tank site. Specifically, the liquid level indicator read in pounds per square inch;
- m. Failed to ensure that all chemicals and any additional or replacement process media used in treatment of water supplied by the PWS conform to the American National Standards Institute/National Sanitation Foundation ("ANSI/NSF") Standard 60 for Drinking Water Treatment Chemicals. Specifically, certification for the sodium hypochlorite solution used for disinfection of drinking water was not available;
- n. Failed to house the hypochlorination solution container in a secure enclosure to protect it from adverse weather conditions and vandalism. Specifically, a drum of sodium hypochlorite was sitting outside the fence at the Facility;
- o. Failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-

connections nor other unacceptable plumbing practices are permitted. Specifically, a new service agreement was not adopted to reflect the new minimum lead percentage requirements;

- p. Failed to provide the Facility's pressure tank with a pressure release device; and
- q. Failed to ensure that all electrical wiring is securely installed in compliance with a local or national electrical code. Specifically, the electrical wiring at the well was not securely installed in a conduit.
- 3. During a record review investigation conducted on and around September 9, 2022, an investigator documented that Respondent failed to adopt and submit to the TCEQ for approval an emergency preparedness plan ("EPP") that demonstrates the Facility's ability to provide emergency operations.

CONCLUSIONS OF LAW

- 1. As evidenced by Finding of Fact No. 1, Respondent is subject to the jurisdiction of TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341, TEX. WATER CODE ch. 13, and the rules of TCEQ.
- 2. As evidenced by Finding of Fact No. 2.a., Respondent failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation, in violation of 30 Tex. ADMIN. CODE § 290.46(f)(2), (f)(3)(B)(iii), (f)(3)(D)(i), and (f)(3)(E)(iv) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.a.i.
- 3. As evidenced by Finding of Fact No. 2.b., Respondent failed to inspect the interior surface of a pressure tank provided with an inspection port every five years, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(1)(B) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.a.ii.
- 4. As evidenced by Finding of Fact No. 2.c., Respondent failed to maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements, in violation of 30 Tex. ADMIN. CODE § 290.121(a) and (b) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.a.v.
- 5. As evidenced by Finding of Fact No. 2.d., Respondent failed to ensure that all clearwells, ground storage tanks, standpipes, and elevated tanks are painted, disinfected, and maintained in strict accordance with current AWWA standards, in violation of 30 Tex. ADMIN. CODE § 290.43(c)(8) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.c.i.
- 6. As evidenced by Finding of Fact No. 2.e., Respondent failed to provide a device to readily determine the air-water-volume for the pressure tank, in violation of 30 TEX. ADMIN. CODE § 290.43(d)(3) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.c.ii.
- 7. As evidenced by Finding of Fact No. 2.f., Respondent failed to provide a primary roof access opening of not less than 30 inches in diameter if an alternative 30-inch diameter access opening is not provided in the Facility's ground storage tank, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(2) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.e.ii.
- 8. As evidenced by Finding of Fact No. 2.g., Respondent failed to maintain accurate and upto-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank at the Facility, in violation of

30 TEX. ADMIN. CODE § 290.46(n)(1) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.e.iii.

- 9. As evidenced by Finding of Fact No. 2.h., Respondent failed to locate the Facility's well at least 150 feet away from an underground petroleum storage tank, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(1)(A) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.g.
- 10. As evidenced by Finding of Fact No. 2.i., Respondent failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation, in violation of 30 Tex. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(iii), (f)(3)(A)(vi), and (f)(3)(D)(ii).
- 11. As evidenced by Finding of Fact No. 2.j., Respondent failed to calibrate the Facility's well meter at least once every three years, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(1).
- 12. As evidenced by Finding of Fact No. 2.k., Respondent 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).
- 13. As evidenced by Finding of Fact No. 2.1., Respondent failed to provide all water storage tanks with a liquid level indicator calibrated in feet of water located at the tank site, in violation of 30 Tex. ADMIN. CODE § 290.43(c)(4).
- 14. As evidenced by Finding of Fact No. 2.m., Respondent failed to ensure that all chemicals and any additional or replacement process media used in treatment of water supplied by the PWS conform to ANSI/NSF Standard 60 for Drinking Water Treatment Chemicals, in violation of 30 Tex. ADMIN. CODE § 290.42(j).
- 15. As evidenced by Finding of Fact No. 2.n., Respondent failed to house the hypochlorination solution container in a secure enclosure to protect it from adverse weather conditions and vandalism, in violation of 30 Tex. ADMIN. CODE § 290.42(e)(5).
- 16. As evidenced by Finding of Fact No. 2.o., Respondent failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in violation of 30 TEX. ADMIN. CODE § 290.46(i).
- 17. As evidenced by Finding of Fact No. 2.p., Respondent failed to provide the Facility's pressure tank with a pressure release device, in violation of 30 TEX. ADMIN. CODE § 290.43(d)(2).
- 18. As evidenced by Finding of Fact No. 2.q., Respondent failed to ensure that all electrical wiring is securely installed in compliance with a local or national electrical code, in violation of 30 TEX. ADMIN. CODE § 290.46(v) and TCEQ Agreed Order Docket No. 2016-1029-MLM-E, Ordering Provision No. 2.a.vi.
- 19. As evidence by Finding of Fact No. 3, Respondent failed to adopt and submit to the TCEQ for approval an EPP that demonstrates the Facility's ability to provide emergency operations, in violation of TEX. WATER CODE § 13.1394(b)(2).
- 20. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049 and TEX. WATER CODE § 13.4151(a), TCEQ has the authority to assess an administrative penalty against Respondent for violations of state statutes within TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 21. An administrative penalty in the amount of \$13,904 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE § 341.049(b) and TEX. WATER CODE § 13.4151(b).

Pursuant to TEX. WATER CODE § 7.067, \$13,904 of the penalty shall be conditionally offset by Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the SEP Agreement ("Attachment A" - incorporated herein by reference). 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 any payment schedule and the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

ORDERING PROVISIONS

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

1. Respondent shall implement and complete a SEP as set forth in Conclusion of Law No. 21. The amount of \$13,904 of the assessed administrative penalty is conditionally offset based on Respondent's implementation and completion of a SEP pursuant to the terms and conditions contained in 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. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Douglassville, Docket No. 2019-0676-MLM-E" to:

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

- 2. Respondent shall undertake the following technical requirements:
 - a. Within 195 days after the effective date of this Order, implement an interconnect with Western Cass Water Supply Corporation, after which time Respondent's Facility will cease to be a PWS.
 - b. Within 210 days after the effective date of this Order, submit written certification to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be accompanied by detailed supporting documentation, including photographs, receipts, and/or other records, shall be signed by Respondent, and shall include the following certification language:

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

The written certification and supporting documentation necessary to demonstrate compliance with these Ordering Provisions shall be sent to:

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

and:

City of Douglassville Docket No. 2019-0676-MLM-E Page 6

> Section Manager, Public Drinking Water Water Supply Division, MC 155 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- 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 Respondent. 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 Respondent shall be made in writing to the Executive Director. Extensions are not effective until Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
- 6. This Order, issued by the Commission, shall not be admissible against Respondent in a civil proceeding, unless the proceeding is brought by the Office of the Attorney General of the State of Texas ("OAG") to: (1) enforce the terms of this Order, or (2) pursue violations of a statute within TCEQ's jurisdiction, or of a rule adopted or an order or permit issued by TCEQ under such a statute. The Executive Director may, without further notice or hearing, refer this matter to the OAG for further enforcement proceedings if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions in this Order.
- 7. 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. 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.
- 10. 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.

City of Douglassville Docket No. 2019-0676-MLM-E Page 7

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

For the Executive Director

March 3, 2025

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 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;
- Referral of this case to the Attorney General's office 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 Attorney General's office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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

Signature - Dewitt McCall, Mayor City of Douglassville P.O. Box 36 Douglassville, Texas 75560 11-26-2024

Date

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

ATTACHMENT A SUPPLEMENTAL ENVIRONMENTAL PROJECT

Attachment A

Docket Number: 2019-0676-PWS-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	City of Douglassville
Penalty Amount:	\$13,904
SEP Offset Amount:	\$13,904
Type of SEP:	Compliance
Project Name:	PWS Interconnect
Location of SEP:	Cass 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"). 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 system (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 perform an interconnect with Western Cass Water Supply Corporation. Specifically, the SEP Offset Amount shall be used for materials, supplies, and equipment for the connection, including a meter, backflow prevention assembly, various valves, and fittings (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 provide access to safe drinking water. Safe, reliable drinking water is necessary for human health and household sanitation. Untreated water may harbor 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.

Safe water is also necessary in the home for bathing, flushing toilets, washing hands, and cooking.

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	Total
Waterline Interconnect and Related Accessories	\$13,904
Total	\$13,904

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 195 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: <u>sepreports@tceq.texas.gov</u>

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 30 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 195-day timeframe set forth above in Section 2, Performance Schedule. Thereafter, Respondent shall submit progress reports to TCEQ in 90-day increments containing detailed information on all actions completed on the Project to date as set forth below in the Reporting Schedule table:

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

Reporting Schedule

B. Final Report

Within 195 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. Copies of all engineering plans related to work performed pursuant to the Project, if applicable;
- 8. Dated photographs of the purchased materials and supplies; before and after work being performed during the Project; and of the completed Project; and
- 9. 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.