<b>Order Type:</b> Agreed Order	
<b>Media:</b> MWD	
<b>Small Business:</b> No	
<b>Location(s) Where Violation(s)</b> C 11127 Circle Drive, Austin, Travi	
<b>Type of Operation:</b> domestic wastewater treatment o	operation
Other Significant Matters: Additional Pending Enforcemen Past-Due Penalties: Past-Due Fees: Other: Interested Third Parties:	nt Actions: None None None None None None
Texas Register Publication Date	: November 26, 2021
Comments Received:	None
	<u>Penalty Information</u>
Total Penalty Assessed:	\$74,250
Total Paid to General Revenue:	\$1,250
<b>Total Due to General Revenue:</b> Payment Plan: 34 payments of S	\$73,000 \$1,250 each and a 35 <sup>th</sup> payment of \$30,500
<b>Compliance History Classificati</b> Person/CN - High Site/RN - High	ons:
Major Source:	No
Statutory Limit Adjustment:	None
Applicable Penalty Policy:	April 2014
	Investigation Information
Complaint Date(s):	N/A
Date(s) of Investigation:	May 23, 2019
Date(s) of NOV(s):	N/A
Date(s) of NOE(s):	July 26, 2019

## Violation Information

- 1. Failed to obtain the necessary authorization from the Commission to commence construction of the necessary additional treatment and/or collection facilities whenever the flow reaches 90% of the permitted daily average flow for three consecutive months [TEX. ADMIN. CODE §§ 305.125(1) and 305.126(a) and TCEQ Permit No. WQ0013860001, Operational Requirements No. 8.a.].
- 2. Failed to test the reduced-pressure backflow assembly ("RPBA") annually [30 Tex. ADMIN. CODE § 317.4(a)(8)].
- 3. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal [30 TEX. ADMIN. CODE § 305.125(1) and (5) and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1].
- 4. Failed to provide atmospheric vacuum breakers on all potable water washdown hoses [30 TEX. ADMIN. CODE §§ 317.4(a)(8) and 317.7(i)].
- 5. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal [30 TEX. ADMIN. CODE § 305.125(1) and (5), and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1 and Special Provisions No. 8].
- 6. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal [30 TEX. ADMIN. CODE §§ 305.125(1) and (5) and 317.1(a), and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1].
- 7. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal [30 TEX. ADMIN CODE §§ 305.125(1) and (5), and 317.1(a), and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1].
- 8. Failed to comply with the permitted effluent limitations [TEX. ADMIN. CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1) and (5), and TCEQ Permit No. WQ0013860001, Effluent Limitations and Monitoring Requirements No. A].
- 9. Failed to submit a complete annual sludge report ("ASR") to the TCEQ by September 30th of each year [30 TEX. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Special Provisions No. 12].
- 10. Failed to report an unauthorized discharge in writing to the TCEQ within five working days of becoming aware of the noncompliance [30 TEX. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Monitoring Requirements No. 7.a and 7.b].
- 11. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal resulting in an unauthorized discharge of wastewater [TEX. ADMIN. CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE §§ 305.125(1) and (5), 317.1(a), and TCEQ Permit No. WQ0013860001, Permit Conditions No. 2.g].
- 12. Failed to report to the TCEQ in writing, any effluent violation which deviates from the permitted effluent limitation by more than 40% within five working days of becoming aware of the noncompliance [30 TEX. ADMIN. CODE § 305.125(1) and (9)(A) and TCEQ Permit No. WQ0013860001, Monitoring Requirements No. 7.c].
- 13. Failed to obtain authorization from the TCEQ before beginning any change in the permitted facility or activity that may result in noncompliance with any permit requirements [TEX. ADMIN. CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1) and (7), and TCEQ Permit No. WQ0013860001, Permit Conditions Nos. 2.e and 2.g].

#### EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 58056 GRANITE STONEBRIDGE HEALTH CENTER LLC RN101520500 Docket No. 2019-1076-MWD-E

- 14. Failed to ensure the irrigation practices are designed and managed so as to prevent ponding of effluent or contamination of ground and surface waters and to prevent the occurrence of nuisance conditions in the area [30 TEX. ADMIN. CODE § 305.125(1) and (5) and TCEQ Permit No. WQ0013860001, Special Provisions No. 6 and Operational Requirements No. 1].
- 15. Failed to erect adequate signs stating that the irrigation water is from a non-potable water supply for any area where treated effluent is stored or where there exists hose bibs or faucets [30 TEX. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Special Provisions No. 7].
- 16. Failed to submit the results of the annual soil sample analyses to the TCEQ no later than September 1st of each sampling year [30 TEX. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Special Provisions No. 15].

### **Corrective Actions/Technical Requirements**

### **Corrective Action(s) Completed:**

The dosing pump's filter was cleaned on May 23, 2019 to allow the spray heads in the gravel filter to operate properly.

#### **Technical Requirements:**

- 1. Within 30 days:
  - a. Repair or replace the RPBA at the Facility and test and certify as passing by a TCEQ licensed backflow prevention assembly tester;
  - b. Install an atmospheric vacuum breaker on the potable water spigot at the Facility;
  - c. Remove and properly dispose of the accumulation of solids from Septic Tank No. 1, Septic Tank No. 2, recirculation tank and dosing tank;
  - d. Reduce the wastewater level from Septic Tank No. 1, Septic Tank No. 2, recirculation tank and dosing tank;
  - e. Repair and/or replace the back-up pump in the dosing tank and place it back into service;
  - f. Repair and/or replace the back-up pump in the recirculation tank and place it back into service;
  - g. Install a high-level alarm system or autodialer at the Facility;
  - h. Submit ASRs for the monitoring periods ending July 31, 2017, and July 31, 2018;
  - i. Submit a noncompliance notification for the unauthorized discharge that occurred on May 23, 2019;
  - j. Cease the unauthorized discharge of wastewater at the Facility, clean and disinfect the affected areas, and properly dispose of the wastewater;
  - k. Update the Facility's operational guidance and conduct employee training to ensure that all self-reporting requirements are properly accomplished, including the timely submittal of ASRs and noncompliance notifications, to ensure that the RPBA is tested annually, and to ensure that irrigation practices are designed and managed so as to prevent ponding of effluent or contamination of ground and surface waters and to prevent nuisance conditions in the area;

- 1. Return the Facility to authorized conditions to prevent unauthorized discharges of wastewater, including the removal of the overflow pipe from Septic Tank No. 2;
- m. Erect adequate signs stating that the irrigation water is from a non-potable water supply for any area where treated effluent is stored or where there exist hose bibs or faucets, including the effluent sampling spigot, in accordance with TCEQ Permit No. WQ0013860001, Special Provisions No.7; and
- n. Submit the results of the annual soil sample analyses for 2017 and 2018, in accordance with TCEQ Permit No. WQ0013860001, Special Provisions No. 15.
- 2. Within 45 days, submit written certification to demonstrate compliance with Technical Requirement Nos. 1.a. through 1.n.
- 3. Within 130 days, submit written certification demonstrating compliance with the permitted effluent limitations of TCEQ Permit No. WQ0013860001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current effluent data, demonstrating at least three consecutive months of compliance with all permitted effluent limitations.
- 4. Within 300 days, obtain the necessary authorization from the Commission to commence construction of the necessary additional treatment and/or collection facilities.
- 5. Within 315 days, submit written certification to demonstrate compliance with Technical Requirement No. 4.

	<u>Liligation information</u>
Date Petition(s) Filed:	February 3, 2021; April 7, 2021
Date Answer(s) Filed:	February 26, 2021
SOAH Referral Date:	April 14, 2021
Hearing Date(s):	
Preliminary hearing:	June 17, 2021
Evidentiary hearing:	October 26, 2021 (remanded)
Settlement Date:	October 1, 2021

# Litigation Information

# **Contact Information**

**TCEQ Attorneys:** Casey Kurnath, Litigation, (512) 239-3400 Amanda Pesonen, Public Interest Counsel, (512) 239-6363

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

TCEQ Enforcement Coordinator: Alejandro Laje, Enforcement, (512) 239-2547

TCEQ Regional Contact: Elijah Gandee, Austin Regional Office, (512) 339-2929

**Respondent Contact:** John Heller, President, GRANITE STONEBRIDGE HEALTH CENTER LLC, 2 Park Plaza, Suite 800, Irvine, California 92614

**Respondent's Attorney:** Don Shandy, Crowe & Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma, 73102

	Policy Revision 4 (A		nalty Ca	alculatior	n Worksł	neet (PC	,	Revision March 26, 201
TCEQ								
DATES	7.00.1g.1.0u				F		1	
	PCW	20-Aug-2020	Screening	30-Jul-2019	EPA Due			
RESPO		TY INFORMATI						
Dec		GRANITE STONE	BRIDGE HEA	LIH CENTER LL				
	g. Ent. Ref. No. ty/Site Region				Major/N	linor Source	Minor	
Facili	ty/Site Region	11-Austin				intor Source	MINU	
CASE T	NFORMATION							
	f./Case ID No.	58056			No. (	of Violations	16	
		2019-1076-MWD	)-Е			Order Type		
Med	lia Program(s)				Government	t/Non-Profit		
	Multi-Media						Alejandro Laje	2
							Enforcement	
Adr	min. Penalty \$ I	Limit Minimum	\$0	Maximum	\$25,000			
-								
			Penalt	y Calculat	ion Section	on		
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	Compliance Hi			-10.0%	Adjustment		tals 2, 3, & 7	-\$8,25
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	Culpability	No		0.0%	Enhancement		Subtotal 4	\$
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	Good Faith Eff	ort to Comply T	otal Adjustn	nents			Subtotal 5	\$
							Subtotal	Ψ
	Economic Ben	efit		0.0%	Enhancement*		Subtotal 6	\$
	E altra da d	Total EB Amounts	\$1,939	*Capped	at the Total EB \$	Amount		
	Estimated	Cost of Compliance	#NAME?					
CUM						_		¢74.25
SUM	OF SUBTOTA	LS 1-7				F	inal Subtotal	\$74,25
OTHE					0.00/			
		AS JUSTICE M I Subtotal by the indic			0.0%		Adjustment	\$
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PATA	BLE PENALT	I						\$74,25

	Enf. Coo	Media Water Quality rdinator Alejandro Laje			
		Compliance History Worksheet			
	iance Histo nponent	ory <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	0	0%	
		Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	0	0%	
	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%	
	idgments d 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%	
Co	onvictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%	
E	missions	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 ( <i>number of audits for which notices were submitted</i> )	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 Pere	centage (Sub	o <b>total 2)</b> 0	%
> Repeat	t Violator (	(Subtotal 3)			
	No	Adjustment Per	centage (Sub	ototal 3) 0	%
> Compli	iance Hist	ory Person Classification (Subtotal 7)			
	High Perf	ormer Adjustment Per	centage (Sub	ototal 7) -10	0%
> Compl	iance Hist	ory Summary		_	
	mpliance History Notes	Reduction for High Performer classification.		]	
		Total Compliance History Adjustment Percentage (S	Subtotals 2,	<b>3, &amp; 7)</b> -1	0%
> Final Co	mpliance	History Adjustment		-+ 1000	0.07
		Final Adjustment Percenta	aye "capped	at 100% -10	0%

**Docket No.** 2019-1076-MWD-E

Screening Date 30-Jul-2019

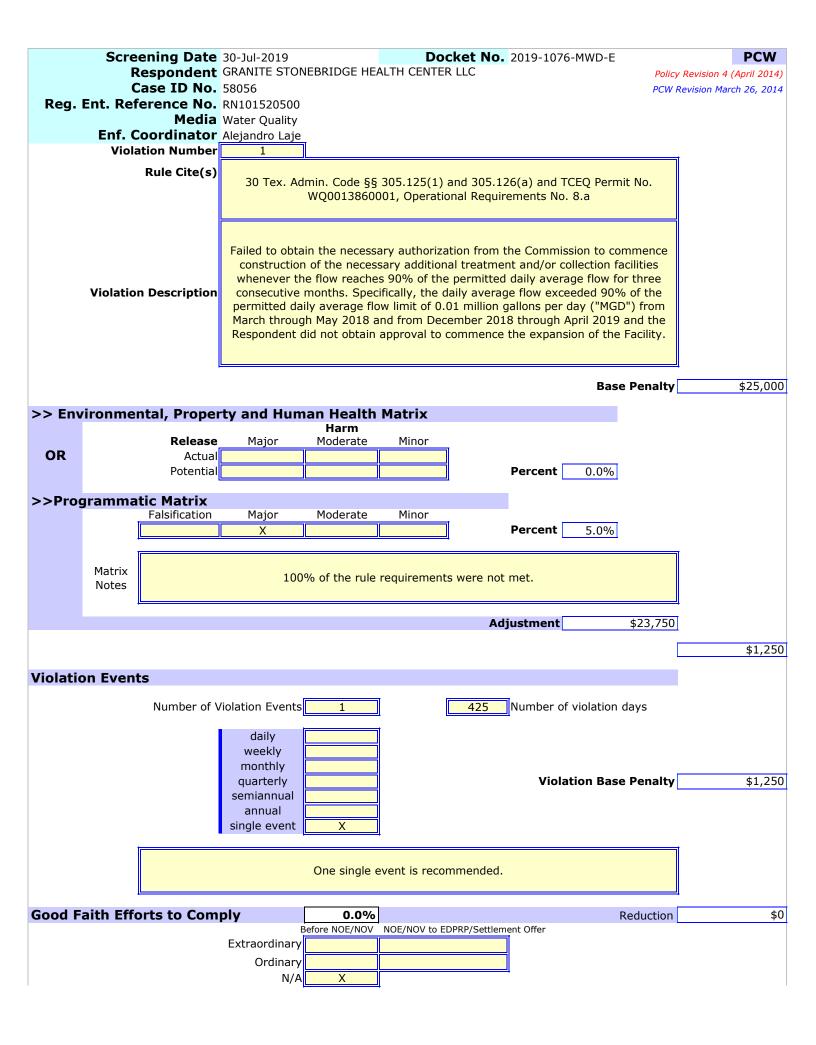
Case ID No. 58056

Reg. Ent. Reference No. RN101520500

Respondent GRANITE STONEBRIDGE HEALTH CENTER LLC

PCW

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



Notes	The Respondent does not meet the good faith criteria for this violation.	
	Violation Subtota	\$1,250
Economic Benefit (EB) for this violati	on Statutory Limit Test	
Estimated EB Amount	\$982 Violation Final Penalty Tota	\$1,125
	This violation Final Assessed Penalty (adjusted for limits	\$1,125

eg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
						5.0	1
		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	\$5,000	31-May-2018	20-Mar-2021	2.81	\$47	\$935	\$982
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
			•	0.00	\$0 from the Commis	n/a sion to commence of	\$0 construction of
Other (as needed) Notes for DELAYED costs	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	0.00 rization r collect y avera of comp	\$0 from the Commis tion facilities. Date ge flow limit and t liance.	n/a sion to commence o required is the thi the final date is the	\$0 construction of rd of three estimated dat
Other (as needed) Notes for DELAYED costs Avoided Costs	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	0.00 rization r collect y avera of comp	\$0 from the Commis tion facilities. Date ge flow limit and t liance. item (except for	n/a sion to commence of required is the thi the final date is the <b>one-time avoide</b>	\$0 construction of rd of three estimated dat
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	ization r collect y avera of comp	\$0 from the Commis tion facilities. Date ge flow limit and t liance. <b>item (except for</b> \$0	n/a sion to commence of required is the thi the final date is the rone-time avoide \$0	\$0 construction of rd of three estimated dat ed costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	rization r collect y avera of comp tering 0.00	\$0 from the Commis tion facilities. Date ge flow limit and t liance. item (except for \$0 \$0	n/a sion to commence of required is the thi the final date is the <b>r one-time avoide</b> \$0 \$0	\$0 construction of rd of three estimated dat cd costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	ization r collect y avera of comp tering 0.00 0.00	\$0 from the Commis tion facilities. Date ge flow limit and t liance. item (except for \$0 \$0 \$0	n/a sion to commence of required is the thi the final date is the <b>r one-time avoide</b> \$0 \$0 \$0	\$0 construction of rd of three estimated dat cd costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	rization r collect y avera of comp tering 0.00	\$0 from the Commis tion facilities. Date ge flow limit and t liance. item (except for \$0 \$0	n/a sion to commence of required is the thi the final date is the <b>r one-time avoide</b> \$0 \$0	\$0 construction of rd of three estimated dat cd costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	rization r collect y avera of comp tering 0.00 0.00 0.00	\$0 from the Commis tion facilities. Date ge flow limit and t liance. item (except for \$0 \$0 \$0 \$0 \$0	n/a sion to commence of required is the thi the final date is the <b>cone-time avoide</b> \$0 \$0 \$0 \$0 \$0	\$0 construction of rd of three estimated dat ed costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	the nece consecutive n	ssary additional t nonths exceeding	reatment and/o 90% of the dai	0.00 rization r collect y avera of comp tering 0.00 0.00 0.00 0.00	\$0 from the Commis ion facilities. Date ge flow limit and t liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a sion to commence of required is the thi the final date is the so <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 construction of rd of three estimated dat ed costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

			GRANITE STONE	BRIDGE HEA		<b>cket No.</b> 2 LLC	2019-1076			PCW evision 4 (April 2014) vision March 26, 2014
Reg.	Ent. Referen Enf. Coord	ce No. R Media V linator A	RN101520500 Water Quality							
	Violation I Rule	Number Cite(s)	2	20 T	ex. Admin. Co	do 6 217 4	(-)(9)			
	Violation Des	cription	Failed to te					3A") annually.		
								Base Per	nalty	\$25,000
>> Env	vironmental,	Propert	y and Huma	n Health <sub>Harm</sub>	Matrix					
OR		Release Actual Potential	Major X	Moderate	Minor	I	Percent	15.0%		
>>Pro	grammatic M									
		ification	Major	Moderate	Minor		Percent	0.0%	1	
			or the environm otective of huma							
						Adju	ustment	\$21	,250	
										\$3,750
Violati	on Events									
	Nur	mber of Vio	olation Events	1		<u>68</u> [	Number of	violation days		
			daily weekly monthly quarterly semiannual				Viola	tion Base Per	nalty	\$3,750
			annual single event	X						
				One single o	event is recon	nmended.				
Good F	aith Efforts t	o Comp		0.0%		DDD/Cattlerses	h Offer	Reduc	ction	\$0
			Extraordinary	ore NOE/NOV	NOE/NOV to ED	PRP/Settlemen	it Offer			
			Ordinary N/A	x						
			Notes 7	The Respond	ent does not i this v	meet the goo violation.	od faith cri	teria for		
							١	iolation Sub	total	\$3,750
Econor	nic Benefit (B	EB) for t	his violation	l		5	Statutor	y Limit Tes	t	
	I	Estimated	d EB Amount		\$28	V	iolation F	nal Penalty T	otal	\$3,375
				This viol	ation Final A	Assessed Pe	enalty (ad	justed for lin	nits)	\$3,375

	E	conomic	Benefit	Wo	rksheet		
-		NEBRIDGE HEALT	H CENTER LLC				
Case ID No.							
Reg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of
Violation No.	2						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	[			1	1		
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0 \$0	<u>\$0</u> \$0	\$0
Other (as needed) Engineering/Construction				0.00	\$0	\$0 \$0	\$0 \$0
Ligineering/construction				0.00	\$0		\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$250	23-May-2019	23-Jun-2020	1.09	\$14	n/a	\$14
Remediation/Disposal			20 9411 2020	0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$250	23-May-2019	23-Jun-2020	1.09	\$14	n/a	\$14
Notes for DELAYED costs	ensure that ASRs and irrigation pra ground a investigation	all self-reporting noncompliance no actices are design and surface water date and the fina Facility as passing	requirements ar otifications; ens ed and manage rs and to preven Il date is the est I by a TCEQ lice	e prope ure that d so as at nuisa imated nsed ba	erly accomplished, t the RPBA is tester to prevent pondir nce conditions in t compliance date. fackflow prevention	nd conduct employ including the timel ed annually; and to og of effluent or cor the area. Date requi Estimated cost test assembly tester. D date of compliance	y submittal of ensure that tamination of ired is the and certify the vate required is
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs		1		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$500			TOTAL		\$28

Reg. E	R	ase ID No.	GRANITE STONEBRIDGE H		<b>No.</b> 2019-1076-MWD-E		PCW Revision 4 (April 2014) evision March 26, 2014
	Enf. C	Media oordinator ntion Number	Water Quality Alejandro Laje 3				
	Violatio	Rule Cite(s) n Description	Failed to properly ope	Operational Requirements of the second		ns of	
					Base	Penalty	\$25,000
>> Envi	ronmei	ntal, Proper	rty and Human Healt	h Matrix			
OR		<b>Release</b> Actual Potential		Minor	Percent 15.0%		
>>Prog	ramma	tic Matrix					
· · · · · · · · · · · · · · · · · · ·		Falsification	Major Moderate	Minor	Percent 0.0%		
	Matrix Notes		h or the environment will or rotective of human health o				
					Adjustment	\$21,250	
						Г	\$3,750
Violation	. Evont	'e				_	
VIOIALIOI	LVEII						
		Number of \	/iolation Events <u>3</u>	68	Number of violation of	lays	
			daily weekly monthly X quarterly		Violation Base	Penalty	\$11,250
			semiannual annual single event				¥11/230
		Three monthly	y events are recommended, the scree	calculated from the in ning date (July 30, 201		2019) to	
Good Fa	ith Effc	orts to Com	ply 0.00 Before NOE/NC Extraordinary Ordinary			eduction	\$0
			N/A X Notes The Respo	ndent does not meet th this violatio	ne good faith criteria for n.		
					Violation	Subtotal	\$11,250
Economi	ic Bene	fit (EB) for	this violation		Statutory Limit	Test	
		Estimate	ed EB Amount	\$38	Violation Final Pena	Ity Total	\$10,125
			This v	iolation Final Assess	ed Penalty (adjusted fo	r limits)	\$10,125

	E	conomic	Ronofit	Wa	rkshoot		
				WW UI	I NJIICEL		
		NEBRIDGE HEALTI	H CENTER LLC				
Case ID No.	58056						
Reg. Ent. Reference No.	RN101520500						
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
VIOIALION NO.	3						-
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment	\$500	23-May-2019	23-Jun-2020	1.09	\$2	\$36	\$38
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs Avoided Costs			is the estim	ated da	ate of compliance.	vestigation date an	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	<u>\$0</u> \$0
Supplies/Equipment				0.00	\$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)		i i		0.00	\$0	\$0	\$0
Notes for AVOIDED costs					· · · · · · · · · · · · · · · · · · ·		

Case ID No	t GRANITE STONEBRIDGE HE 58056	<b>Docket No.</b> 2019-1076-MWD-E EALTH CENTER LLC		PCW vision 4 (April 2014) sion March 26, 2014
Reg. Ent. Reference No Medi	RN101520500 Water Quality			
Enf. Coordinato				
Violation Number				
Rule Cite(s	30 Tex. Ad	dmin. Code §§ 317.4(a)(8) and 317.7(i)		
Violation Descriptio	n hoses. Specifically, an a	heric vacuum breakers on all potable water wa atmospheric vacuum breaker was not installed table water spigot at the Facility.		
			e Penalty	\$25,000
>> Environmental, Prop		n Matrix		
Releas	e Major Moderate	Minor		
OR Actu				
Potenti	al X	Percent 15.0%		
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		
		Percent 0.0%		
Matrix Human hea	th or the environment will or	could be exposed to pollutants that would exce	eed levels	
		environmental receptors as a result of the vio		
		Adjustment	\$21,250	
				\$3,750
				\$5,750
Violation Events				
Number of	Violation Events 3	68 Number of violation	davs	
Number 0			uays	
	daily			
	weekly			
	monthly X	Violation Bas	o Bonalty	¢11 250
	quarterly semiannual			\$11,250
	annual			
	single event			
Three month		calculated from the investigation date (May 23	<mark>, 2019) to</mark>	
	the screen	ing date (July 30, 2019).		
Cood Faith Efforts to Coo			Deskartism	\$0
Good Faith Efforts to Cor	nply 0.0% Before NOE/NOV		Reduction	<del>پ</del> ۵
	Extraordinary			
	Ordinary			
	N/A X			
	The Respon	dent does not meet the good faith criteria for		
	Notes	this violation.		
	<u> </u>	Violation	Subtotal	\$11,250
Economic Benefit (EB) fo	r this violation	Statutory Limit		
	ted EB Amount	\$2 Violation Final Pen		\$10,125
Louine				
	This vie	olation Final Assessed Penalty (adjusted f	or limits)	\$10,125

	E.	conomic	Ronofit	Wo	rkchoot		
_ · ·					KSHEEL		
		NEBRIDGE HEALT	H CENTER LLC				
Case ID No.							
eg. Ent. Reference No.	RN101520500						
Media	Water Quality						Years of
Violation No.						Percent Interest	Depreciatio
						5.0	. 1
	-	Data Daminut	Elucit Data	No.	T		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment	\$25	23-May-2019	23-Jun-2020	1.09	\$0	\$2	\$2
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
						1 -	
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	Estimated cos	st to install an atm	nospheric vacu	0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed) Notes for DELAYED costs	requ	ired is the investig	ation date and	0.00 0.00 um brea the fin	\$0 \$0 ker on the potable al date is the estin	n/a n/a e water spigot at the nated date of compl	\$0 \$0 e Facility. Date iance.
Other (as needed) Notes for DELAYED costs Avoided Costs	requ	ired is the investig	ation date and	0.00 0.00 um brea the fin	\$0 \$0 ker on the potable al date is the estin item (except for	n/a n/a e water spigot at the nated date of compl r <b>one-time avoide</b>	\$0 \$0 e Facility. Date iance. <b>d costs)</b>
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal	requ	ired is the investig	ation date and	0.00 0.00 the fin tering 0.00	\$0 \$0 ker on the potable al date is the estin item (except for \$0	n/a n/a e water spigot at the nated date of compl r <b>one-time avoide</b> \$0	\$0 \$0 e Facility. Date iance. d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	requ	ired is the investig	ation date and	0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 ker on the potable al date is the estin <b>item (except for</b> \$0 \$0	n/a n/a water spigot at the nated date of compl r <b>one-time avoide</b> \$0 \$0	\$0 \$0 e Facility. Date iance. d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	requ	ired is the investig	ation date and	0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 ker on the potable al date is the estin item (except for \$0 \$0 \$0	n/a n/a water spigot at the nated date of compl r <b>one-time avoide</b> \$0 \$0 \$0	\$0 \$0 e Facility. Date jance. d costs) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	requ	ired is the investig	ation date and	0.00 0.00 the fin 0.00 0.00 0.00 0.00	\$0 \$0 ker on the potable al date is the estin item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a e water spigot at the nated date of compl r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0	\$0 \$0 e Facility. Date jance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	requ	ired is the investig	ation date and	0.00 0.00 the fin 0.00 0.00 0.00 0.00 0.00	\$0 \$0 ker on the potable al date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a water spigot at the nated date of compl r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 e Facility. Date jance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	requ	ired is the investig	ation date and	0.00 0.00 the fin 0.00 0.00 0.00 0.00	\$0 \$0 ker on the potable al date is the estin item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a e water spigot at the nated date of compl r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0	\$0 \$0 e Facility. Date jance. d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	requ	ired is the investig	ation date and	0.00 0.00 the fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 ker on the potable al date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a water spigot at the nated date of compl r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 e Facility. Dat jance. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	requ	ired is the investig	ation date and	0.00 0.00 the fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 ker on the potable al date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a water spigot at the nated date of compl r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 e Facility. Dat jance. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2019-1076-MWD-E	PCW
		-	GRANITE STONEBRIDGE	IEALTH CENTER LLC	Policy Revision 4 (April 2014)
Deg		Case ID No.	58056 RN101520500		PCW Revision March 26, 2014
Reg.	Ent. Rei		Water Quality		
	Enf. C		Alejandro Laje		
		ation Number			
		Rule Cite(s)		05.125(1) and (5), and TCEQ Permit No. WQ001386 quirements No. 1 and Special Provisions No. 8	0001,
	Violatio	n Description	collection, treatment, and 1 was completely covered	rate and maintain the Facility and all of its systems disposal. Specifically, the surface within Septic Tar with solids and other debris, and the wastewater le 2, recirculation tank, and dosing tank were at or clo the top of the access lids.	<mark>ik No.</mark> evel in
				Base Pe	enalty \$25,000
>> Env	vironme	ntal, Propei	rty and Human Healt	h Matrix	
		Release	Harm Major Moderate	e Minor	
OR		Actual			
		Potential	X	<b>Percent</b> 5.0%	
>>Proc	Iramma	tic Matrix			
~~riog	jrannia	Falsification	Major Moderate	e Minor	
				<b>Percent</b> 0.0%	
		Human healt	th or the environment will	ar could be expected to clarificant amounts of pollut	anta
	Matrix			or could be exposed to significant amounts of pollut otective of human health or environmental receptor	
	Notes			sult of the violation.	
					2.750
				Adjustment \$2	23,750
					\$1,250
Violatio	on Even	ts			
Violatic					
		Number of \	/iolation Events 4	68 Number of violation day	'S
			daily		
			weekly		
			monthly		h +5 000
			quarterly <u>X</u> semiannual	Violation Base Pe	enalty \$5,000
			annual		
			single event		
		_			
			,	ded, one for each treatment unit. Calculated from to 2019) to the screening date (July 30, 2019).	ne
Good F	aith Fff	orts to Com	ply 0.0°	26	uction \$0
GUUU F			Before NOE/NO		action \$0
			Extraordinary		
			Ordinary		
			N/A <u>X</u>		
			Notes The Respo	ndent does not meet the good faith criteria for this violation.	
				Violation Su	btotal \$5,000
Econom	nic Bene	efit (EB) for	this violation	Statutory Limit Te	st
			ed EB Amount	\$54 Violation Final Penalty	
		Estimati	<u> </u>		
			This v	iolation Final Assessed Penalty (adjusted for li	<b>mits)</b> \$4,500

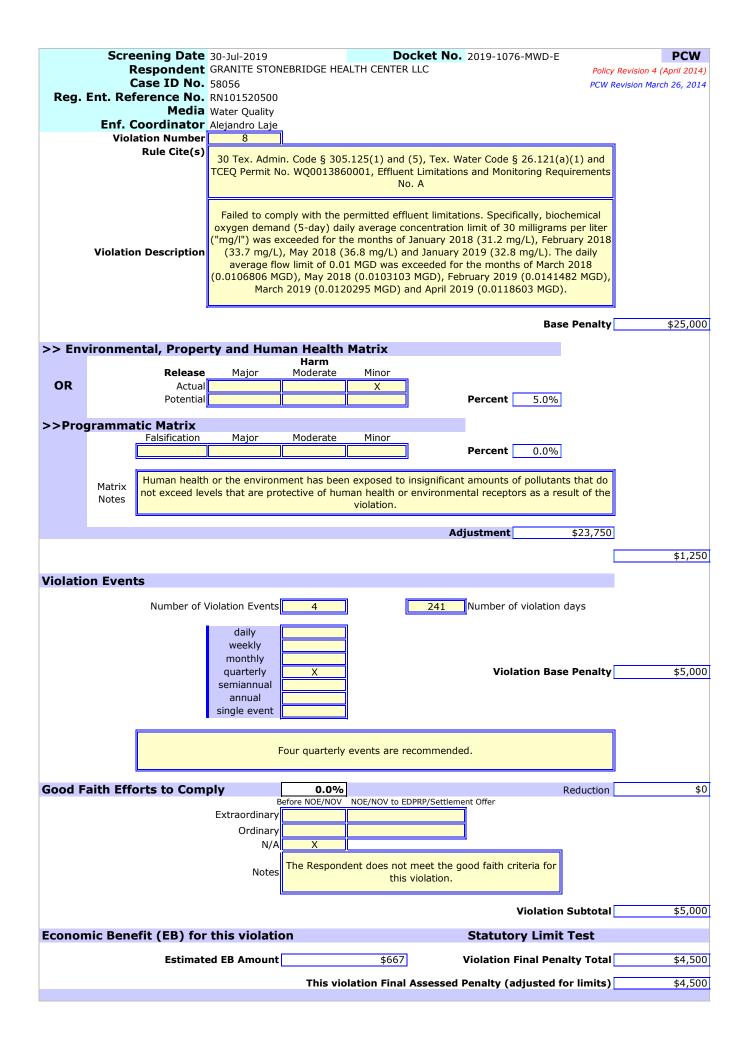
	E	conomic	Benefit	Wo	rksheet		
Respondent	GRANITE STO	NEBRIDGE HEALT	TH CENTER LLC				
Case ID No.	58056						
Reg. Ent. Reference No.	RN101520500						
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
Violation No.	5					5.0	15
	Thomas Count	Data Daminad	Final Data	Vera	Turbowe at Coursed		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				7			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	¢1.000	22 May 2010	22 Jun 2020	0.00	\$0	n/a	\$0
Remediation/Disposal Permit Costs	\$1,000	23-May-2019	23-Jun-2020	1.09	\$54 \$0	n/a n/a	<u>\$54</u> \$0
Other (as needed)				0.00	\$0 \$0	n/a	\$0 \$0
other (as needed)	Ectimated	act to romovo a	ad proporty disp			f solids from Septic	
						•	
Notes for DELAYED costs						vastewater level fro	
	No. 1, Septic					ired is the investig	ation date and
					ated date of comp		
Avoided Costs	ANNUA	LIZE avoided o	costs before en		<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	<u>\$0</u> \$0	\$0 \$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$0	\$0 <b>\$0</b>	\$0 <b>\$0</b>
				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	<b>\$</b> U	<b>D</b>
Notes for AVOIDED costs							
	r		1				
Approx. Cost of Compliance		\$1,000			TOTAL		\$54

	Scre	ening Date	30-Jul-2019		Doo	cket No. 2019-1076-MWD-E	PCW
	F	Respondent	GRANITE STON	EBRIDGE HEA	LTH CENTER I	LLC Poli	icy Revision 4 (April 2014)
		Case ID No.				PCW	/ Revision March 26, 2014
Reg.	. Ent. Rei	ference No. Modia	RN101520500 Water Quality				
	Enf. C		Alejandro Laje				
		ation Number					
		Rule Cite(s)	30 Tex. Admi			(5) and 317.1(a) and TCEQ Permit No.	
			Failed to pr		<i>,</i> ,	n the Facility and all of its systems of	-
	Violatio	n Description	collection, t	reatment, and	d disposal. Spe	ecifically, the dosing pump's filter was heads from applying wastewater across	
						Base Penalt	<b>y</b> \$25,000
>> En	vironme	ntal, Propei	rty and Hum	an Health	Matrix		
		Release	Major	Harm Moderate	Minor		
OR		Actual		Moderate	мпо		
		Potential		Х		Percent 5.0%	
>>Pro	gramma	tic Matrix					
		Falsification	Major	Moderate	Minor	-	
						Percent 0.0%	
		Human health	or the environm	nent will or cor	uld be expose	d to significant amounts of pollutants tha	ıt
	Matrix Notes			are protective	of human hea	Ith or environmental receptors as a resul	
	Notes			of	the violation.		
						Adjustment \$23,75	0
							\$1,250
Violati	ion Even	ts					
		Number of \	/iolation Events	1	Γ	1 Number of violation days	
				<b>L</b>			
			daily				
			weekly monthly				
			quarterly	X		Violation Base Penalt	<b>y</b> \$1,250
			semiannual				·
			annual				
			single event				
		One quarterly	event is recomm		lated from the pliance (May 2	e investigation date (May 23, 2019) to the 23, 2019).	e
Good F	Faith Effe	orts to Com		0.0%		Reduction	ז \$0
				efore NOE/NOV	NOE/NOV to EDP	PRP/Settlement Offer	
			Extraordinary Ordinary				
			N/A	X			
			Notes			neet the good faith criteria for	
						Violation Subtota	l \$1,250
Econor	mic Bene	efit (EB) for	this violatio	n		Statutory Limit Test	
		Estimate	ed EB Amount		\$0	Violation Final Penalty Tota	l \$1,125
				This vio	ation Final A	Assessed Penalty (adjusted for limits	) \$1,125

	E	conomic	Benefit	Wo	rksheet		
Bochondont		NEBRIDGE HEALTI					
			I CLINILK LLC				
Case ID No.							
leg. Ent. Reference No.							
Media	Water Quality					Percent Interest	Years of
Violation No.	6					reitent interest	Depreciatio
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
The second states		Date Required	That Date	115	Interest Saveu	COSIS Saveu	LD Amount
Item Description	i .						
Delayed Costs	·	1		1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	<u>\$0</u> \$0
Training/Sampling				0.00	\$0	n/a	<u>\$0</u> \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$25	23-May-2019	23-May-2019	0.00	\$0	n/a	\$0
Notes for DELAYED costs	proper	y. Date required is	s the investigat	ion dat	e and the final dat	ads in the gravel filt e is the date of com	pliance.
Avoided Costs	ANNU	ALIZE avoided co	osts defore en	_		one-time avoide	-
Disposal				0.00	\$0 \$0	\$0 ¢0	\$0
Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	<u>\$0</u> \$0
Supplies/Equipment				0 00	\$()	€()	
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0	\$0	
Financial Assurance							\$0 <b>\$</b> 0

Reg.	F	ening Date Respondent Case ID No. Ference No.	GRANITE STONEBRIDGE HE 58056	<b>Docket No.</b> 2019-1076-MWD-E ALTH CENTER LLC		PCW v Revision 4 (April 2014) Revision March 26, 2014
	Enf. C	Media Coordinator	Water Quality Alejandro Laje			
	VIOI	ation Number Rule Cite(s)	30 Tex. Admin. Code §§ 3	305.125(1) and (5) and 317.1(a) and TCEQ Per 50001, Operational Requirements No. 1	rmit No.	
	Violatio	n Description		ate and maintain the Facility and all of its syste disposal. Specifically, the back-up pump in the tank was not operable.		
					e Penalty	\$25,000
>> En	vironme	ntal, Proper	ty and Human Health <sub>Harm</sub>	Matrix		
OR		<b>Release</b> Actual Potential	Major Moderate	Minor Percent 5.0%		
>>Pro	gramma	tic Matrix				
		Falsification	Major Moderate	Minor Percent 0.0%		
	Matrix Notes	Human healt that would no	t exceed levels that are prot	could be exposed to significant amounts of po ective of human health or environmental recep It of the violation.	ollutants otors as a	
				Adjustment	\$23,750	
					[	\$1,250
Violati	on Even	ts				
		Number of V	/iolation Events	68 Number of violation	days	
			daily weekly monthly quarterly X semiannual annual single event	Violation Base	e Penalty	\$1,250
		One quarterl		lculated from the investigation date (May 23, 2 ing date (July 30, 2019).	2019) to	
Good F	Faith Effe	orts to Com			Reduction	\$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer		
			Ordinary			
			N/A <u>X</u> Notes The Respond	dent does not meet the good faith criteria for this violation.		
				Violation	Subtotal	\$1,250
Econor	mic Bene	efit (EB) for	this violation	Statutory Limit	Test	
			ed EB Amount	\$38 Violation Final Pena		\$1,125
				plation Final Assessed Penalty (adjusted fo		\$1,125
					/	+=,==0

	E	conomic	Benefit	Wo	rksheet		
Respondent		NEBRIDGE HEALTH		-			
Case ID No.			I CENTER LEC				
leg. Ent. Reference No.							
	Water Quality					<b>Percent Interest</b>	Years of
Violation No.	/						Depreciatio
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	\$500	23-May-2019	23-Jun-2020	1.09	\$2	\$36	\$38
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	<u>\$0</u> \$0
Notes for DELAYED costs						l place it back into s nated date of compl	
		_					
Avoided Costs Disposal	ANNUA	ALIZE avoided co	osts before en	1	s0	r one-time avoide	
						¢∩	-
•		ir ir		0.00		\$0 \$0	\$0
Personnel				0.00	\$0	\$0	\$0 \$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0 \$0
•				0.00	\$0	\$0	\$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0



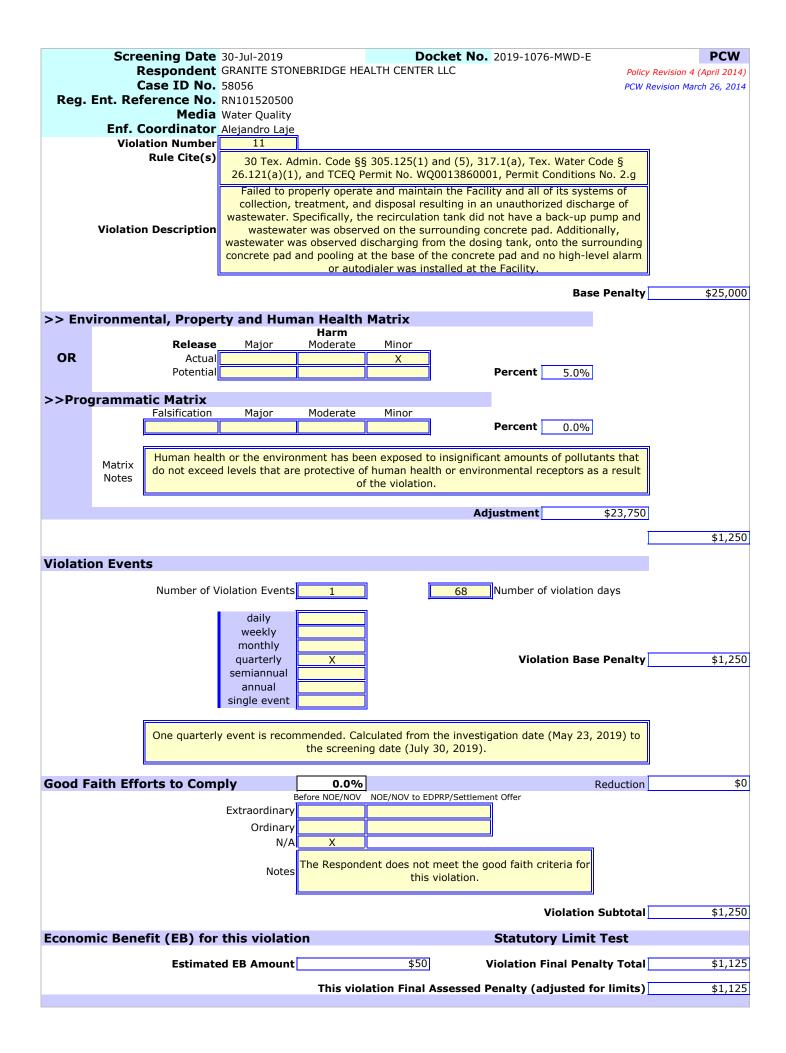
	-						
		conomic		<b>VVO</b>	rksneet		
Respondent	GRANITE STO	NEBRIDGE HEALTH	H CENTER LLC				
Case ID No.	58056						
Reg. Ent. Reference No.	RN101520500	)					
	Water Quality						Years of
Violation No.						<b>Percent Interest</b>	Depreciation
	, 0						-
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings		i i		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	31-Jan-2018	1-Oct-2020	2.67	\$667	n/a	\$667
Notes for DELAYED costs Avoided Costs	to the Facility	<ol> <li>Date required is</li> </ol>	the initial dat	e of nor of comp	ncompliance and the second the second the second seco	iny necessary repair he final date is the e	estimated date
		ALIZE avolueu CC	Sts Delote el				
Disposal				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Personnel Inspection/Reporting/Sampling				0.00	\$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
Notes for AVOIDED costs		· · · · · · · · · · · · · · · · · · ·					

		ening Date		Docket No. 20	19-1076-MWD-E	PCW
			GRANITE STONEBRIDGE	EALTH CENTER LLC		y Revision 4 (April 2014)
Rea		Case ID No.	58056 RN101520500		PCW	Revision March 26, 2014
Reg.			Water Quality			
	Enf. C		Alejandro Laje			
	Viol	ation Number				
		Rule Cite(s)	30 Tex. Admin. Code § 3	05.125(1) and TCEQ Permit No Provisions No. 12	o. WQ0013860001, Special	
	Violatio	n Description		mplete annual sludge report (' year. Specifically, the ASRs for submitted.		
					Base Penalty	\$25,000
>> En	vironme	ntal, Propei	rty and Human Healt <sub>Harm</sub>	h Matrix		
		Release		e Minor		
OR		Actual				
		Potential		Pe	ercent 0.0%	
>>Pro	ogramma	tic Matrix				
	granna	Falsification	Major Moderate	e Minor		
			Х	Pe	ercent 5.0%	
						ก
	Matrix		100% of the r	ule requirements were not met		
	Notes		100 /0 01 110 1	ale requirements were not met		
		L				1
				Adjus	<b>tment</b> \$23,750	]
						\$1,250
						·
Violati	ion Even	ts				
		Number of \	Violation Events 2	668 Nu	mber of violation days	
			daily			
			weekly monthly			
			quarterly		Violation Base Penalty	\$2,500
			semiannual			1 / 2 2 2
			annual			
			single event X			
			Two single events a	re recommended, one for each	n ASR.	
Good F	Faith Eff	orts to Com	ply 0.0	%	Reduction	\$0
			Before NOE/NO			·
			Extraordinary			
			Ordinary			
			N/A  <u>X</u>			
			Notes The Respo	ndent does not meet the good	faith criteria for	
				this violation.		
					Violation Subtotal	\$2,500
Econor	mic Bene	efit (EB) for	this violation	St	atutory Limit Test	
		Estimat	ed EB Amount	\$7 <b>Vio</b>	lation Final Penalty Total	\$2,250
1				ielation Final Accord Don	alty (adjusted for limits)	\$2,250
			I his v	iolation Final Assessed Pen	any (aujusteu ior mints)	μ2,230

	E	conomic	Benefit	Wo	rksheet		
-		NEBRIDGE HEALT	TH CENTER LLC				
Case ID No.							
Reg. Ent. Reference No. Media	Water Quality						Years of
Violation No.	/					Percent Interest	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 Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$50	30-Sep-2017	23-Jun-2020	2.73	\$7	n/a	\$7
Notes for DELAYED costs	ensure that ASRs is caput ASRs for the	all self-reporting tured in the Econ monitoring perio	requirements ar omic Benefit Wo ds ending July the first annual	e propo orkshee 31, 201 sludge	erly accomplished, It for Violation No. 7 and July 31, 202	nd conduct employo including the timel 2. Estimated other 18 (\$25 for each mi nd the final date is	y submittal of cost to submit ssing report x
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	<u>\$0</u> \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 <b>\$0</b>
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				0.00			
Approx. Cost of Compliance		\$50			TOTAL		\$7

	Scre	ening Date	30-Jul-2019		Do	ocket No. 2019-102	76-MWD-E	PCW
	R	Respondent	GRANITE STON	IEBRIDGE HEA	ALTH CENTER	RLLC	Polic	y Revision 4 (April 2014)
	C	Case ID No.	58056				PCW	Revision March 26, 2014
Reg.	Ent. Ref	erence No.	RN101520500					
			Water Quality					
			Alejandro Laje					
	Viola	ation Number						-
		Rule Cite(s)	30 Tex. Ac	lmin. Code § 3	305.125(1) a	and TCEQ Permit No.	WQ0013860001,	
						ents Nos. 7.a and 7.t		
						harge in writing to the		
	Violatio	n Description				f the noncompliance. was observed at the		
	Violatio	n Description				not submit a noncom		
			gutio			vorking days.		
							Base Penalty	\$25,000
							Base renarcy	φ25,000
>> Env	vironme	ntal, Propei	rty and Hum	an Health	Matrix			
				Harm				
0.0		Release		Moderate	Minor	l i i i i i i i i i i i i i i i i i i i		
OR		Actual Potential		I		Percent	0.00/	
		Potential				Percent	0.0%	
>>Pro	aramma	tic Matrix						
	gramma	Falsification	Major	Moderate	Minor			
			X			Percent	5.0%	
								_
	Mark							
	Matrix Notes		100	% of the rule	requirement	ts were not met.		
	Notes							
								-
						Adjustment	\$23,750	
								\$1,250
								<i></i>
Violatio	on Event	ts						
			. 1					
		Number of V	iolation Events/	1		61 Number	of violation days	
			بالما					
			daily weekly					
			monthly					
			quarterly			Vio	ation Base Penalty	\$1,250
			semiannual				,	+-/
			annual					
			single event	Х				
								5
				One single e	event is reco	mmended.		
								1
Good F	aith Effo	orts to Com	nlv	0.0%			Reduction	\$0
00001					NOE/NOV to El	OPRP/Settlement Offer	Reduction	L +•
			Extraordinary					
			Ordinary					
			N/A	Х				
						we are the state of faith the	uitaria far	
			Notes	The Responde		meet the good faith oviolation.	criteria for	
								11 050
							Violation Subtotal	\$1,250
Econor	nic Bene	efit (EB) for	this violatio	on		Statuto	ory Limit Test	
						010100	,	
		Estimate	ed EB Amount		\$1	Violation	Final Penalty Total	\$1,125
				This viel	ation Final	Assessed Penalty (a	diusted for limite	\$1,125
						naacaacu relidity (a		\$1,125

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	58056	NEBRIDGE HEALT	H CENTER LLC				
—	Water Quality					Percent Interest	Years of Depreciation
						5.0	
Item Description	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 Record Keeping System				0.00	\$0 \$0	n/a n/a	\$0 \$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)	\$25	30-May-2019	23-Jun-2020	1.07	\$1	n/a	\$1
Notes for DELAYED costs	occurred on estimated o employee trai	May 23, 2019. I compliance date. ning to ensure th	Date required is Estimated cost nat all self-repor pliance notificat	the dat to upda ting re- tions is	te the notification ite the Facility's op quirements are pro	the unauthorized of was due and the fir perational guidance operly accomplished iconomic Benefit Wo	al date is the and conduct I, including the
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	<sup>·</sup> one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	<u>\$0</u> \$0	\$0
Notes for AVOIDED costs				0.00		<u> </u>	ΨŪ
Approx. Cost of Compliance		\$25			TOTAL		\$1



	E	conomic	Benefit	Wo	rksheet		
		NEBRIDGE HEALT	TH CENTER LLC				
Case ID No.							
Reg. Ent. Reference No. Media	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delaused Consta							
Delayed Costs Equipment	\$2,000	23-May-2019	23-Jul-2019	0.17	\$1	¢22	¢72
Buildings	\$2,000	23-May-2019	23-Jul-2019	0.17	\$1 \$0	<u>\$22</u> \$0	<u>\$23</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	\$500	23-May-2019	23-Jun-2020	1.09	\$27	n/a	\$27
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	investigation	date and the fina	al date is the est	imated	/ 1	astewater. Date rec e. Estimated cost to	
	the Facility. D	ate required is th	e investigation	date an	d the final date is	the estimated date	or autodialer at of compliance
Avoided Costs	the Facility. D	ate required is th	e investigation	date an	d the final date is item (except for	the estimated date	r autodialer at of compliance d costs)
Disposal	the Facility. D	ate required is th	e investigation	date an tering 0.00	d the final date is item (except for \$0	the estimated date one-time avoide \$0	of compliance d costs) \$0
Disposal Personnel	the Facility. D	ate required is th	e investigation	date an tering 0.00 0.00	d the final date is item (except for \$0 \$0	the estimated date <b>one-time avoide</b> \$0 \$0	r autodialer at of compliance d costs) \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling	the Facility. D	ate required is th	e investigation	date an tering 0.00 0.00 0.00	d the final date is item (except for \$0 \$0 \$0	the estimated date one-time avoide \$0 \$0 \$0	r autodialer at of compliance d costs) \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	the Facility. D	ate required is th	e investigation	date an 0.00 0.00 0.00 0.00	d the final date is item (except for \$0 \$0 \$0 \$0 \$0	the estimated date one-time avoide \$0 \$0 \$0 \$0 \$0	r autodialer at of compliance d costs) \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	the Facility. D	ate required is th	e investigation	date an tering 0.00 0.00 0.00 0.00 0.00	d the final date is item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	the estimated date one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	r autodialer at of compliance d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	the Facility. D	ate required is th	e investigation	date an 0.00 0.00 0.00 0.00	d the final date is item (except for \$0 \$0 \$0 \$0 \$0	the estimated date one-time avoide \$0 \$0 \$0 \$0 \$0	r autodialer at of compliance d costs) \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	the Facility. D	ate required is th	e investigation	date an tering 0.00 0.00 0.00 0.00 0.00 0.00	d the final date is item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the estimated date one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r autodialer at of compliance d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date							PCW			
			GRANITE STONEBRIDGE HEALTH CENTER LLC					y Revision 4 (April 2014)		
Dea		Case ID No.					PCW	Revision March 26, 2014		
Reg.	Ent. Rei		RN101520500 Water Quality							
	Enf. C		Alejandro Laje							
		ation Number								
		Rule Cite(s)	30 Tex.	Admin, Code	§ 305,125()	) and (9)(A) and TCE	O Permit No.			
				30 Tex. Admin. Code § 305.125(1) and (9)(A) and TCEQ Permit No. WQ0013860001, Monitoring Requirements No. 7.c						
				1						
			Failed to repor the permitted							
	Violatio	n Description	becoming awar							
			noncompliar	becoming aware of noncompliance. Specifically, the Respondents did not provide a noncompliance notification for the exceedance during the monthly monitoring						
					period of Fe	bruary 2019.				
								+25.000		
							Base Penalty	\$25,000		
>> Env	vironme	ntal, Proper	ty and Hum	an Health	Matrix					
		· · ·	-	Harm						
OR		<b>Release</b> Actual	Major	Moderate	Minor					
UK		Potential				Percent	0.0%			
>>Prog	gramma	tic Matrix	N4	Madaata	Misse					
		Falsification	Major X	Moderate	Minor	Percent	5.0%			
						i ci cent	5.070			
								]		
	Matrix Notes		100	)% of the rule	e requirment	s were not met.				
	Notes									
						Adjustment	\$23,750	n		
						Aujustment	\$25,750			
								\$1,250		
Violatio	on Event	ts								
			T							
		Number of V	iolation Events	1		145 Number o	of violation days			
			daily		1					
			weekly							
			monthly							
			quarterly			Viol	ation Base Penalty	\$1,250		
			semiannual annual							
			single event	Х						
			-					3		
				o · · ·						
				One single	event is reco	mmended.				
		L						<u> </u>		
Good F	aith Effo	orts to Com		0.0%			Reduction	\$0		
			B Extraordinary	efore NOE/NOV	NOE/NOV to EI	OPRP/Settlement Offer				
			· · · · · · · · · · · · · · · · · · ·							
	Ordinary N/A X									
			11,71							
			Notes	The Respond		meet the good faith c violation.	riteria for			
					0113					
							Violation Subtota	\$1,250		
								· · · · · · · · · · · · · · · · · · ·		
Econor	nic Bene	efit (EB) for	this violatio	n		Statuto	ory Limit Test			
		Estimate	ed EB Amount		\$25	Violation	Final Penalty Tota	\$1,125		
				This viol	ation Final	Assessed Penalty (a	djusted for limits)	\$1,125		

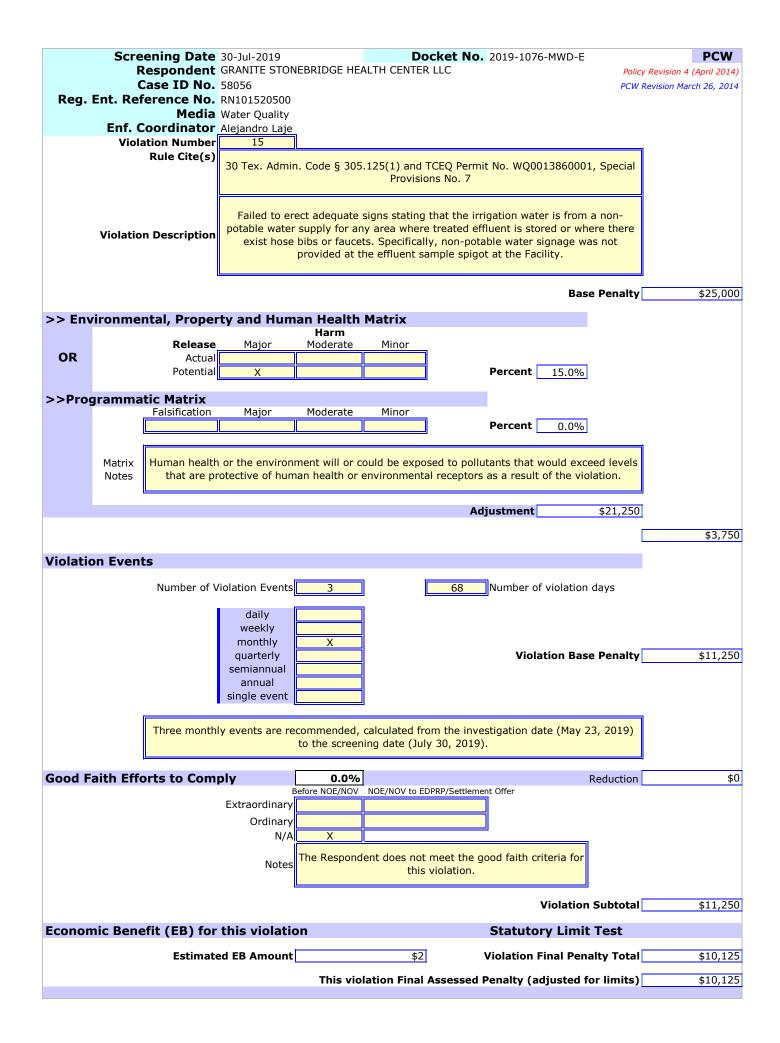
	E	conomic	Benefit	Wo	rksheet		
Pesnondent		NEBRIDGE HEALT					
-							
Case ID No.							
Reg. Ent. Reference No.							
	Water Quality					<b>Percent Interest</b>	Years of
Violation No.	12						Depreciatio
						5.0	1
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amoun
Item Description							
item bescription							
Delayed Costs							
Equipment	) 			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	<u>\$0</u> \$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	all self-reporti r	ng requirements a notifications is cap	are properly accounted in the E	complis	hed, including the c Benefit Workshe	t employee training timely submittal of et for Violation No.	noncomplian 2.
Avoided Costs	ANNUA	ALIZE avoided co	osts before er	tering		one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance	+25	7 May 2010	20.1.1.2010	0.00	\$0	\$0	\$0
ONE-TIME avoided costs	\$25	7-Mar-2019	30-Jul-2019	0.40	\$0 ¢0	\$25	\$25
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs	limitations by	more than 40% t ys of becoming av	o the TCEQ Aus ware of the non	stin Reg Icomplia	ional Office and th	tes from the permit le Enforcement Divi d is the date the no ening date.	sion within fiv

		ening Date				cket No. 2019-107	76-MWD-E	PCW
		-	GRANITE STONE	BRIDGE HEA	LTH CENTER	LLC		cy Revision 4 (April 2014)
Rea		Case ID No. Ference No.					PCW	Revision March 26, 2014
Keg.	Lift. Kei		Water Quality					
	Enf. C		Alejandro Laje					
	Viola	ation Number						-
		Rule Cite(s)				[7), Tex. Water Code Permit Conditions No		
						CEQ before beginning esult in noncompliand		
	Violatio	n Description				pe was installed in Se		
						ground. Additionally,		<mark>S</mark>
			overflow	vs (concrete	discoloration	and soil erosion) wa	s observed.	
							Base Denalt	
							Base Penalty	\$25,000
>> Env	vironme	ntal, Propei	ty and Humar		Matrix			
		Release	Major	<b>Harm</b> Moderate	Minor			
OR		Actual		X				
		Potential				Percent	15.0%	
>> Bro	arommo	tic Matrix						
>>P10	yi amma	Falsification	Major	Moderate	Minor			
						Percent	0.0%	
	Matrix					ignificant amounts of		
	Notes	not exceed lev	reis that are protec	clive of num	violation.	environmental recept	ors as a result of the	2
						Adjustment	\$21,250	)
								\$3,750
\/:-I-+:		•						
violatio	on Event	[S						
		Number of \	/iolation Events	3		68 Number o	of violation days	
			1-11					
			daily weekly					
			monthly	Х				
			quarterly			Vio	ation Base Penalty	\$11,250
			semiannual					
			annual single event					
								=
		Three monthly	/ events are recom	nmended, ca	lculated from	the investigation da	te (May 23, 2019) to	<b>)</b>
			t	the screenin	g date (July 3	30, 2019).		
		<u> </u>						
Good F	aith Effo	orts to Com		0.0%			Reduction	\$0
			Extraordinary	ore NOE/NOV	NUE/NUV to ED	PRP/Settlement Offer		
			Ordinary					
			N/A	Х				
			т	he Responde	ent does not i	meet the good faith c	riteria for	
			Notes			violation.		
							Violation Subtota	<b>I</b> \$11,250
Econor	nic Bene	efit (EB) for	this violation			Statuto	ory Limit Test	
					100		_	
		Estimate	ed EB Amount		\$38	Violation	Final Penalty Tota	\$10,125
				This viol	ation Final A	Assessed Penalty (a	adjusted for limits	\$10,125

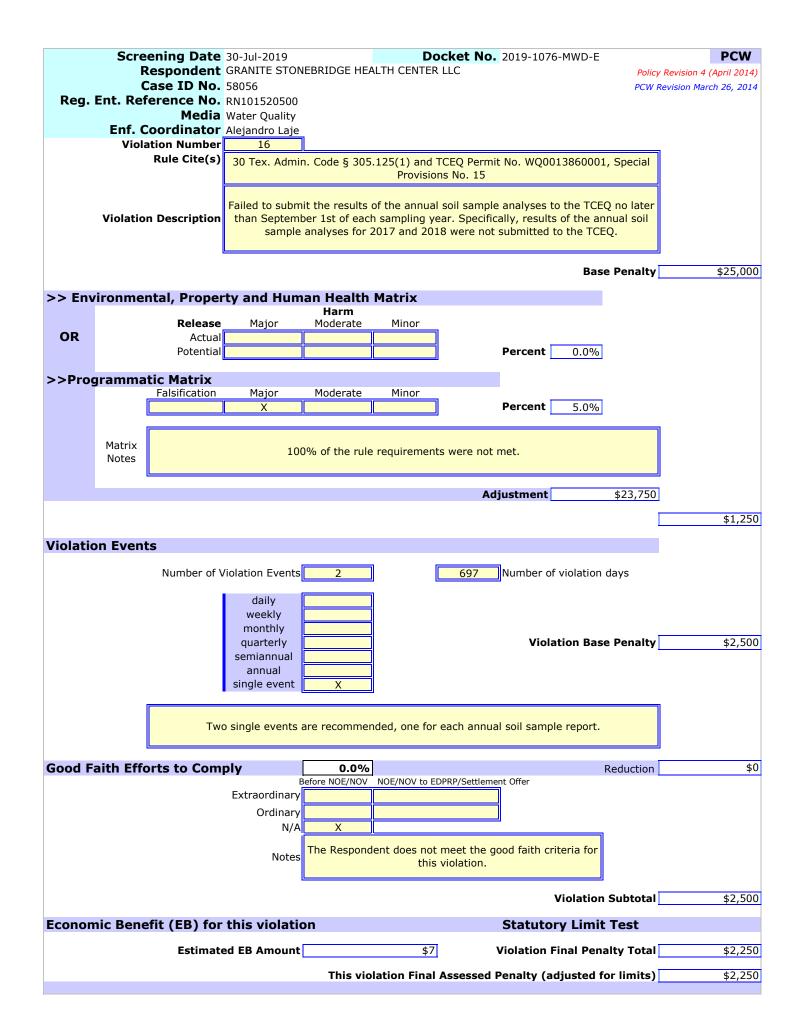
	F	conomic	Renefit	Wo	rksheet		
Deenendent				110	INSIICCU		
		NEBRIDGE HEALT	H CENTER LLC				
Case ID No.							
Reg. Ent. Reference No.	RN101520500						
Media	Water Quality					Percent Interest	Years of
Violation No.	. 13					Percent Interest	Depreciation
						5.0	1
	Thom Cost	Data Deguirad	Einel Date	Yrs	Interest Saved	Costs Saved	EB Amount
		Date Required	Final Date	TIS	Interest Saved	Costs Saved	EB Amount
Item Description	J						
Delayed Costs	;			a	1		
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$500	23-May-2019	23-Jun-2020	1.09	\$2	\$36	\$38
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Permit Costs				0.00	\$0	n/a n/a	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	n/a	<u>\$0</u> \$0
Notes for DELAYED costs	wastewate	er, including the re investigation d	emoval of the o ate and the fina	verflow al date	pipe from Septic is the estimated d	•	uired is the
Avoided Costs		ALIZE avoided co	osts defore er	_		r one-time avoide	-
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Personnei Inspection/Reporting/Sampling				0.00	\$0	\$0	<b>⊅</b> ∪
Inspection/ Reporting/ Sampling					J ⊅U		έΛ
					¢Ο		\$0 ¢0
Supplies/Equipment				0.00	\$0 ¢0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00		\$0	\$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00	\$0 \$0	\$0 \$0 \$0	\$0 \$0 <mark>\$0</mark>

		ening Date	30-Jul-2019 GRANITE STONEBRIDGE HI	Docket No. 2019-1076-MWD-E	PCW
	C	Case ID No.	58056		Policy Revision 4 (April 2014) PCW Revision March 26, 2014
Reg.	Ent. Ref	ference No. Media	RN101520500 Water Quality		
		Coordinator	Alejandro Laje		
	Viola	ation Number Rule Cite(s)			
		Rule Cite(S)	30 Tex. Admin. Code § 30 Special Provisio	101,	
			Failed to ensure that irr prevent ponding of effluer		
	Violatio	n Description	prevent the occurrence o	nt	
			ponding was observed	in effluent disposal Zones 4, 9, and 10. Additionally, and 7 were saturated and the Respondents continued	
				irrigate.	
				Base Pen	alty \$25,000
>> Env	vironme	ntal, Proper	rty and Human Health <sub>Harm</sub>	n Matrix	
		Release	Major Moderate	Minor	
OR		Actual Potential		Percent 15.0%	
		tic Motrix	<u>r</u>		
>>₽го	gramma	tic Matrix Falsification	Major Moderate	Minor	
				<b>Percent</b> 0.0%	
	Matrix			en exposed to significant amounts of pollutants which	
	Notes	not exceed l	evels that are protective of	human health or environmental receptors as a result the violation.	of
				Adjustment \$21,	
					\$3,750
Violatio	on Even	ts			
		Number of V	/iolation Events 3	Number of violation days	
			daily weekly		
			monthly X		
			quarterly semiannual	Violation Base Pen	alty \$11,250
			annual		
			single event		
		Three month		, calculated from the investigation date (May 23, 20 ening date (July 30, 2019).	.9)
Good F	aith Effe	orts to Com	ply 0.0%	6 Reduc	tion \$0
			Before NOE/NO	/ NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A X		
			Notes The Respon	dent does not meet the good faith criteria for this violation.	
				Violation Subt	otal \$11,250
Econor	nic Bene	efit (EB) for	this violation	Statutory Limit Test	:
		Estimate	ed EB Amount	\$0 Violation Final Penalty T	otal \$10,125
			This vi	olation Final Assessed Penalty (adjusted for lim	its) \$10,125

Economic Benefit Worksheet								
		NEBRIDGE HEALTH	H CENTER LLC					
Case ID No.								
Reg. Ent. Reference No.							Maawa af	
Violation No.	Water Quality					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	<u> </u>			1			1.0	
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0	
Other (as needed)				0.00	\$0	\$0	\$0	
Engineering/Construction				0.00	\$0	\$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 Permit Costs				0.00	\$0	n/a	\$0	
Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0	
Notes for DELAYED costs	irrigation pra	actices are designed urface waters and	ed and manage to prevent the	ed so as e occurr	to prevent pondir	t employee training og of effluent or con conditions in the are on No. 2	tamination of	
Avoided Costs	ANNUA	LIZE avoided co	osts before er	itering	item (except for	r one-time avoide	d costs)	
Disposal				0.00	\$0	\$0	\$0	
Personnel				0.00	\$0	\$0	\$0	
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
Financial Assurance				0.00	\$0	\$0	\$0	
ONE-TIME avoided costs				0.00	\$0	\$0	\$0 \$0	
Other (as needed)				0.00	\$0	\$0	\$0	
Notes for AVOIDED costs								
Approx. Cost of Compliance		\$0			TOTAL		\$0	



	E	conomic	Benefit	Wo	rksheet		
Bospondont		NEBRIDGE HEALTI					
-			I CLINILK LLC				
Case ID No.							
Reg. Ent. Reference No.	RN101520500						
Media	Water Quality					Percent Interest	Years of
Violation No.	15					Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs				h <del></del>			1.5
Equipment	\$25	23-May-2019	23-Jun-2020	1.09	\$0	\$2	\$2
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 \$0	n/a	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	effluent sampl	ling spigot. Date r	equired is the in	nvestig compli	ation date and the ance.	se bibs or faucets, in final date is the est	timated date o
Avoided Costs	ANNUA	ALIZE avoided co	osts before en	T		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
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							



	E	conomic	Popofit		rkchaat		
				VV O	rksneet		
-		NEBRIDGE HEALTI	H CENTER LLC				
Case ID No.	58056						
Reg. Ent. Reference No.	RN101520500	)					
—	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
Violation No.	10					F 0	-
						5.0	1.
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs	5						
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)	\$50	1-Sep-2017	23-Jun-2020	2.81	\$7	n/a	\$7
Notes for DELAYED costs Avoided Costs	x 2 reports).	Date required is t	he date the firs the estima	t annua ited dat	al soil sample anal e of compliance.	for 2017 and 2018 yses was due and the second s	ne final date is
Disposal	,			0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	<u>\$0</u>
Supplies/Equipment				0.00	\$0	\$0	<u>\$0</u>
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				·			



# Compliance History Report

Compliance History Report for CN603448648, RN101520500, Rating Year 2018 which includes Compliance History (CH) components from September 1, 2013, through August 31, 2018.

Customer, Respondent, or Owner/Operator:						
Regulated Entity:	RN101520500, STONEBRIDGE HEALTH Classification: HIGH Rating: 0.00 CENTER					
<b>Complexity Points:</b>	3	Repeat Violator: NO				
CH Group:	14 - Other					
Location:	cation:11127 Circle Drive, approximately 1,200 feet northeast of the intersection of U.S. Highway 290 and Circle Drive, approximately 5.0 miles west of the intersection of U.S. Highway 290 and State Highway 71, in Travis County, Texas 78736.					
TCEQ Region:	CEQ Region: REGION 11 - AUSTIN					
ID Number(s): WASTEWATER PERMIT WQ0013860001						
Compliance History Period: September 01, 2014 to August 31, 2019 Rating Year: 2019 Rating Date: 09/01/2019						
Date Compliance History Report Prepared: February 18, 2020						
Agency Decision Requiring Compliance History: Enforcement						
Component Period Selected: February 18, 2015 to February 18, 2020						
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.						
Name: Alejandro Laje         Phone: (512) 239-2547						
Site and Owner/Operator History:						

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

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

- A. Final Orders, court judgments, and consent decrees:  $_{N/A} \label{eq:N/A}$
- **B. Criminal convictions:** N/A
- C. Chronic excessive emissions events: \$N/A\$
- D. The approval dates of investigations (CCEDS Inv. Track. No.):  $$\rm N/A$$
- 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. N/A

F. Environmental audits:

N/A

- G. Type of environmental management systems (EMSs): N/A
- H. Voluntary on-site compliance assessment dates:

N/A

- I. Participation in a voluntary pollution reduction program:  $N\!/\!A$
- J. Early compliance: N/A

.,..

Sites Outside of Texas:

N/A

1

#### **Component Appendices**

#### Appendix A All NOVs Issued During Component Period 7/30/2014 and 7/30/2019

Date:	01/20/2017	(1376829)		
			Classification:	Moderate
Self Repo	rt? NO	For Informational	Purposes C	Dnly
Citation:	Page 8, I	hapter 305, SubChapter F 305.1 tem 2g PERMIT pter 26 26.121	25(1)	
Descriptio	on: Failed to	prevent an unauthorized dischar	ge Classification:	Moderate
Self Repo	rt? NO	For Informational	Purposes (	Only
Citation:	30 TAC C	Chapter 26, SubChapter A 26.03 hapter 305, SubChapter F 305.1 tems 7.a and 7.b.i PERMIT		
Descriptio	on: Failed to	provide required noncompliance	notification	

\* NOVs applicable for the Compliance History rating period 9/1/2013 to 8/31/2018

#### Appendix B

All Investigations Conducted During Component Period July 30, 2014 and July 30, 2019

		(1185694) For Informational Durnages Only
Item 1	August 13, 2014**	For Informational Purposes Only
		(1575935)
Item 2	July 26, 2019	For Informational Purposes Only

\* No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2013 and 08/31/2018.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING GRANITE STONEBRIDGE HEALTH CENTER LLC; RN101520500 **BEFORE THE** 

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

#### AGREED ORDER

§

### DOCKET NO. 2019-1076-MWD-E

#### I. JURISDICTION AND STIPULATIONS

On \_\_\_\_\_\_, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding GRANITE STONEBRIDGE HEALTH CENTER LLC ("Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, represented by the Litigation Division, and Respondent together stipulate that:

- 1. Respondent owns a domestic wastewater treatment operation located at 11127 Circle Drive, in Austin, Travis County, Texas (the "Facility"). The Facility adjoins, is contiguous with, surrounds, or is near or adjacent to state water as defined in Tex. WATER CODE § 26.001(5).
- 2. The Executive Director and Respondent agree that TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. WATER CODE ch. 26, and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of seventy-four thousand two hundred fifty dollars (\$74,250.00) is assessed by the Commission in settlement of the violations alleged in Section II. Respondent paid one thousand two hundred fifty dollars (\$1.250.00) of the penalty. The remaining amount of seventy-three thousand dollars (\$73,000.00) shall be paid in thirty-four (34) monthly payments of one thousand two hundred fifty dollars (\$1,250.00) each and a final thirty fifth (35<sup>th</sup>) payment of thirty thousand five hundred (\$30,500.00). The first monthly payment shall be paid within 30 days after the effective date of this Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until the penalty is paid in full. If Respondent fails to timely and satisfactorily comply with the payment requirements of this Order, including the payment schedule, the Executive Director may, at his option, accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. In addition, Respondent's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance constitutes the failure by Respondent to timely and satisfactorily comply with all the terms of this Order.

- 5. The Executive Director and Respondent agree on a settlement of the matters addressed in this Order, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions contained in this Order.
- 7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable, and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
- 8. This Order shall terminate five years from its effective date or upon full compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. The Executive Director recognizes that on May 23, 2019, Respondent cleaned the dosing pump's filter to allow the spray heads in the gravel filter to operate properly.

#### **II. ALLEGATIONS**

- 1. During an investigation conducted on May 23, 2019, an investigator documented that Respondent:
  - a. Failed to obtain the necessary authorization from the Commission to commence construction of the necessary additional treatment and/or collection facilities whenever the flow reaches 90% of the permitted daily average flow for three consecutive months, in violation of 30 Tex. ADMIN. CODE §§ 305.125(1) and 305.126(a) and TCEQ Permit No. WQ0013860001, Operational Requirements No. 8.a. Specifically, the daily average flow exceeded 90% of the permitted daily average flow limit of 0.01 million gallons per day ("MGD") from March through May 2018 and from December 2018 through April 2019 and Respondent did not obtain approval to commence the expansion of the Facility;
  - b. Failed to test the reduced-pressure backflow assembly ("RPBA") annually, in violation of 30 Tex. ADMIN. CODE § 317.4(a)(8).
  - c. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5) and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1. Specifically, the RPBA for the facility was leaking.
  - d. Failed to provide atmospheric vacuum breakers on all potable water washdown hoses, in violation of 30 Tex. ADMIN. CODE §§ 317.4(a)(8) and 317.7(i). Specifically, an atmospheric vacuum breaker was not installed on the potable water spigot at the Facility.
  - e. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1 and Special Provisions No. 8. Specifically, the surface within Septic Tank No. 1 was completely covered with solids and other debris, and the wastewater level in Septic Tank Nos. 1 and 2, recirculation tank, and dosing tank were at or close to the top of the access lids.

- f. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and (5) and 317.1(a), and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1. Specifically, the dosing pump's filter was clogged with debris, preventing the spray heads from applying wastewater across the gravel filter.
- g. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and (5), and 317.1(a), and TCEQ Permit No. WQ0013860001, Operational Requirements No. 1. Specifically, the back-up pump in the dosing tank was not operable.
- h. Failed to comply with the permitted effluent limitations, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1) and (5), and TCEQ Permit No. WQ0013860001, Effluent Limitations and Monitoring Requirements No. A. Specifically, biochemical oxygen demand (5-day) daily average concentration limit of 30 milligrams per liter ("mg/L") was exceeded for the months of January 2018 (31.2 mg/L), February 2018 (33.7 mg/L), May 2018 (36.8 mg/L), and January 2019 (32.8 mg/L). The daily average flow limit of 0.01 MGD was exceeded for the months of March 2018 (0.0106806 MGD), May 2018 (0.0103103 MGD), February 2019 (0.0141482 MGD), March 2019 (0.0120295 MGD), and April 2019 (0.0118603 MGD).
- i. Failed to submit a complete annual sludge report ("ASR") to the TCEQ by September 30<sup>th</sup> of each year, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Special Provisions No. 12. Specifically, the ASRs for 2017 and 2018 were not submitted.
- j. Failed to report an unauthorized discharge in writing to the TCEQ within five working days of becoming aware of the noncompliance, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Monitoring Requirements No. 7.a and 7.b. Specifically, an unauthorized discharge of wastewater was observed at the Facility during the investigation and Respondent did not submit a noncompliance notification within five working days.
- k. Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal resulting in an unauthorized discharge of wastewater, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE §§ 305.125(1) and (5), 317.1(a), and TCEQ Permit No. WQ0013860001, Permit Conditions No. 2.g. Specifically, the recirculation tank did not have a back-up pump and wastewater was observed on the surrounding concrete pad. Additionally, wastewater was observed discharging from the dosing tank, onto the surrounding concrete pad and pooling at the base of the concrete pad and no high-level alarm or autodialer was installed at the Facility.
- Failed to report to the TCEQ in writing, any effluent violation which deviates from the permitted effluent limitation by more than 40% within five working days of becoming aware of the noncompliance, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (9)(A) and TCEQ Permit No. WQ0013860001, Monitoring Requirements No. 7.c. Specifically, Respondent did not provide a noncompliance notification for the exceedance during the monthly monitoring period of February 2019.
- m. Failed to obtain authorization from the TCEQ before beginning any change in the permitted facility or activity that may result in noncompliance with any permit requirements, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1) and (7), and TCEQ Permit No. WQ0013860001, Permit Conditions Nos. 2.e and 2.g. Specifically, an overflow pipe was installed in Septic Tank No. 2 that

allowed wastewater to discharge onto the ground. Additionally, evidence of previous overflows (concrete discoloration and soil erosion) was observed.

- n. Failed to ensure the irrigation practices are designed and managed so as to prevent ponding of effluent or contamination of ground and surface waters and to prevent the occurrence of nuisance conditions in the area, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5) and TCEQ Permit No. WQ0013860001, Special Provisions No. 6 and Operational Requirements No. 1. Specifically, effluent ponding was observed in effluent disposal Zones 4, 9, and 10. Additionally effluent disposal Zones 2 and 7 were saturated and Respondent continued to irrigate.
- o. Failed to erect adequate signs stating that the irrigation water is from a non-potable water supply for any area where treated effluent is stored or where there exists hose bibs or faucets, violation of 30 TEX. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Special Provisions No. 7. Specifically, non-potable water signage was not provided at the effluent sample spigot at the Facility.
- p. Failed to submit the results of the annual soil sample analyses to the TCEQ no later than September 1st of each sampling year, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and TCEQ Permit No. WQ0013860001, Special Provisions No. 15. Specifically, results of the annual soil sample analyses for 2017 and 2018 were not submitted to the TCEQ.

#### **III. DENIALS**

Respondent generally denies each Allegation in Section II.

#### IV. ORDERING PROVISIONS

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

1. Respondent is assessed an administrative penalty as set forth in Section I, Paragraph 4. The payment of this penalty and Respondent's compliance with all of the requirements set forth in this Order resolve only the Allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations which are not raised here. Penalty payments shall be made payable to TCEQ and shall be sent with the notation "Re: GRANITE STONEBRIDGE HEALTH CENTER LLC, Docket No. 2019-1076-MWD-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 30 days after the effective date of this Order:
    - i. Repair or replace the RPBA at the Facility and test and certify as passing by a TCEQ licensed backflow prevention assembly tester;
    - ii. Install an atmospheric vacuum breaker on the potable water spigot at the Facility;
    - iii. Remove and properly dispose of the accumulation of solids from Septic Tank No. 1, Septic Tank No. 2, recirculation tank and dosing tank;

- iv. Reduce the wastewater level from Septic Tank No. 1, Septic Tank No. 2, recirculation tank and dosing tank;
- v. Repair and/or replace the back-up pump in the dosing tank and place it back into service;
- vi. Repair and/or replace the back-up pump in the recirculation tank and place it back into service;
- vii. Install a high-level alarm system or autodialer at the Facility;
- viii. Submit ASRs for the monitoring periods ending July 31, 2017, and July 31, 2018;
- ix. Submit a noncompliance notification for the unauthorized discharge that occurred on May 23, 2019;
- x. Cease the unauthorized discharge of wastewater at the Facility, clean and disinfect the affected areas, and properly dispose of the wastewater;
- xi. Update the Facility's operational guidance and conduct employee training to ensure that all self-reporting requirements are properly accomplished, including the timely submittal of ASRs and noncompliance notifications, to ensure that the RPBA is tested annually, and to ensure that irrigation practices are designed and managed so as to prevent ponding of effluent or contamination of ground and surface waters and to prevent nuisance conditions in the area;
- xii. Return the Facility to authorized conditions to prevent unauthorized discharges of wastewater, including the removal of the overflow pipe from Septic Tank No. 2;
- xiii. Erect adequate signs stating that the irrigation water is from a non-potable water supply for any area where treated effluent is stored or where there exist hose bibs or faucets, including the effluent sampling spigot, in accordance with TCEQ Permit No. WQ0013860001, Special Provisions No.7; and
- xiv. Submit the results of the annual soil sample analyses for 2017 and 2018, in accordance with TCEQ Permit No. WQ0013860001, Special Provisions No. 15.
- b. Within 45 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 2.f, to demonstrate compliance with Ordering Provision Nos. 2.a.i. through 2.a.xiv.
- c. Within 130 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 2.f, demonstrating compliance with the permitted effluent limitations of TCEQ Permit No. WQ0013860001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current effluent data, demonstrating at least three consecutive months of compliance with all permitted effluent limitations.
- d. Within 300 days after the effective date of this Order, obtain the necessary authorization from the Commission to commence construction of the necessary additional treatment and/or collection facilities.
- e. Within 315 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 2.f, to demonstrate compliance with Ordering Provision No. 2.d.

#### GRANITE STONEBRIDGE HEALTH CENTER LLC Docket No. 2019-1076-MWD-E Page 6

f. The certifications and reports required by these Ordering Provisions 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."

Respondent shall submit the written certifications and copies of documentation necessary to demonstrate compliance with these Ordering Provisions to:

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

and:

Water Section Manager Austin Regional Office 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 Order Compliance Team at the address listed above.
- 6. If Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Respondent's failure to comply is not a violation of this Order. Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Respondent shall notify the Executive Director within seven days after Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 7. This Order, issued by the Commission, shall not be admissible against Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order, or (2) pursue violations of a statute within TCEQ's jurisdiction or of a rule adopted or an order or permit issued by the TCEQ under such a statute.
- 8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and

may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under Tex. Bus. ORG. CODE § 1.002.

9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

#### GRANITE STONEBRIDGE HEALTH CENTER LLC Docket No. 2019-1076-MWD-E Page 8

#### SIGNATURE PAGE

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Frint Chanallop

For the Executive Director

1/12/22 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

M. Scott Rickard

Name (Printed or typed) Authorized representative of GRANITE STONEBRIDGE HEALTH CENTER LLC

Oct 1, 2021

Date

Asset Manager

Title

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