Order Type: Findings Agreed Order Findings Order Justification: N/A Media: MWD **Small Business:** No Location(s) Where Violation(s) Occurred: Country Squire Plant, located immediately west of State Highway 87, approximately 4.5 miles north of the intersection of State Highway 87 and Interstate Highway 10 and approximately 6.9 miles north of the business district of Orange, Orange County ("Facility No. 1"); and 6602 Lancaster Drive, Orange County ("Facility No. 2") **Type of Operation:** Wastewater treatment facility **Other Significant Matters:** Additional Pending Enforcement Actions: No Past-Due Penalties: No Other: N/A **Interested Third-Parties: None** Texas Register Publication Date: September 17, 2021 **Comments Received:** No **Penalty Information** Total Penalty Assessed: \$98,176 Amount Deferred for Financial Inability to Pay: \$94,576 Confidential information, which may include financial or medical information, has been provided to the Commission for their consideration. Total Paid to General Revenue: \$100 Total Due to General Revenue: \$3,500 Payment Plan: 35 payments of \$100 each

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A Complaint Information: N/A Date(s) of Investigation: January 30, 2019 and January 31, 2019 and February 14, 2019 Date(s) of NOE(s): March 28, 2019 and April 10, 2019

Violation Information

1. Failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 TEX. ADMIN. CODE § 305.125(1) and (5), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0011589001, Operational Requirements No. 1].

2. Failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1].

3. Failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 TEX. ADMIN. CODE § 305.125(1) and (5), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1].

4. Failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 TEX. ADMIN. CODE §§ 305.125(1) and (5) and 317.3(e)(5), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1].

5. Failed to maintain monitoring and reporting records at Facility No. 1 [30 TEX. ADMIN. CODE §§ 305.125(1) and (11)(C) and 319.7(a), and TPDES Permit No. WQ0011589001, Monitoring and Reporting Requirements No. 3.c.vi].

6. Failed to take all reasonable steps to minimize or prevent any discharge or sludge use or disposal or other permit violation that has a reasonable likelihood of adversely affecting human health or the environment at Facility No. 1 [30 TEX. ADMIN. CODE § 305.125(1) and (4), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1 and Permit Conditions No. 2.d].

7. Failed to comply with recommended sampling and testing methods at Facility No. 1 [30 TEX. ADMIN. CODE § 319.11].

8. Failed to prevent an unauthorized discharge of sewage wastewater into or adjacent to any water in the state at Facility No. 1 [30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX.

WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011589001, Permit Conditions No. 2.g].

9. Failed to fully report an unauthorized discharge in writing to the Regional Office within five working days of becoming aware of the noncompliance at Facility No. 1 [30 TEX. ADMIN. CODE § 305.125(1) and (9)(A) and TPDES Permit No. WQ0011155001, Monitoring and Reporting Requirements No. 7.a].

10. Failed to secure the lift stations in an intruder-resistant manner [30 TEX. ADMIN. CODE § 317.3(a)].

11. Failed to ensure Facility No. 2 and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 TEX. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0011155001, Operational Requirements No. 1].

12. Failed to accurately report monitoring activities at Facility No. 2 [30 TEX. ADMIN. CODE § 305.125(1) and (12) and TPDES Permit No. WQ0011155001, Permit Conditions No. 1.a].

13. Failed to ensure Facility No. 2 and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 TEX. ADMIN. CODE § 305.125(1) and (5), and TPDES Permit No. WQ0011155001, Operational Requirements No. 1, and TCEQ Agreed Order Docket No. 2015-0604-MWD-E, Ordering Provision No. 2.a.ii].

14. Failed to ensure Facility No. 2 and all of its systems of collection, treatment, and disposal are properly operated and maintained [30 TEX. ADMIN. CODE § 305.125(1) and (5), and TPDES Permit No. WQ0011155001, Operational Requirements No. 1].

15. Failed to timely submit monitoring results at intervals specified in the permit at Facility No. 2 [30 TEX. ADMIN. CODE § 305.125(1) and (17), and TPDES Permit No. WQ0011155001, Monitoring and Reporting Requirements No. 1].

16. Failed to maintain monitoring and reporting records at Facility No. 2 [30 TEX. ADMIN. CODE §§ 305.125(1) and (11)(C), 319.6, and 319.7(a), and TPDES Permit No. WQ0011155001, Monitoring and Reporting Requirements No. 3.c.vi].

17. Failed to submit an annual sludge report to the TCEQ by September 30th of each year at Facility No. 2 [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0011155001, Section IV.C].

18. Failed to prevent unauthorized discharges of sewage wastewater into or adjacent to any water in the state at Facility No. 2 [30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011155001, Permit Conditions No. 2.g].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures at Facility No. 1: a. Ceased the unauthorized discharges, and cleaned and disinfected the affected areas by September 13, 2018;

b. Purchased pH buffer solutions, sodium arsenite, and secondary standards for chlorine by February 14, 2019;

c. Replaced the ventilation fan in the chlorine closet by August 7, 2019;

d. Repaired the concrete foundation at the influent lift station by August 7, 2019;

e. Repaired the Tennyson lift station audio alarm by August 7, 2019; and

f. Removed the floating solids from the Tennyson lift station wet well by August 7, 2019.

The Respondent has implemented the following corrective measures at Facility No. 2:

a. Ceased the unauthorized discharges, and cleaned and disinfected the affected areas by January 24, 2019;

b. Submitted updated discharge monitoring reports ("DMRs") to reflect the actual sample results for August 2017 and September 2017 by March 26, 2019; and

c. Submitted the missing DMR for *E. coli* sample results for the monitoring period ending on December 31, 2017 by April 18, 2019.

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days:
- i. At Facility No. 1:
- (1) Repair the sludge return pipe;
- (2) Repair/replace the rubber skimmer to ensure it meets the clarifier scum ring;
- (3) Ensure even flow over the clarifier weir teeth;

(4) Remove excess algae, surface scum, and duckweed from the clarifier;

(5) Remove and properly dispose of sludge, duckweed, foam, and algae from both chlorine contact chambers;

(6) Repair the influent lift station visual alarm;

(7) Develop and implement a solids management plan at the Facility;

(8) Implement procedures and conduct employee training to ensure proper values for the chlorine secondary standards are recorded in the daily operator log book;

(9) Implement procedures and conduct employee training to properly conduct the manganese correction to calculate total chlorine residual; and

(10) Label the unmarked squirt bottle of sodium arsenite.

ii. At Facility No. 2:

(1) Implement procedures and conduct employee training to ensure noncompliance notifications are submitted complete;

(2) Make repairs to the vertical gap in the fence and the gap at the base of the fence to secure the influent lift station;

(3) Remove and properly dispose of sludge from the chlorine contact chamber;

(4) Remove and properly dispose of sludge and surface scum from both clarifiers;

(5) Implement procedures and conduct employee training to ensure that the colorimeter secondary standard accuracy checks are accurately recorded to include standard values, and to ensure that secondary standards are unexpired; and

(6) Submit the ASRs for the years 2017 and 2018 to the TCEQ Beaumont Regional Office.

b. Within 45 days, submit written certification of compliance with a.i. through a.ii.

c. Within 60 days, remove and properly dispose of plastics and sludge accumulation in the receiving stream at Facility No. 1.

d. Within 75 days, submit written certification of compliance with c.

e. Within 90 days:

i. At Facility No. 1, remove the rust/delamination and repaint the three aeration basins, both chlorine contact chambers, the sludge digester, and the clarifier; and

ii. At Facility No. 2, remove the rust/corrosion and repaint the bar screen area, both clarifiers, the aeration basin, and the chlorine contact chamber.

f. Within 105 days, submit written certification to demonstrate compliance with e.

Contact Information

TCEQ Attorney: N/A **TCEQ Enforcement Coordinator:** Steven Van Landingham, Enforcement Division, Enforcement Team 3, MC 219, (512) 239-5717; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548 **Respondent:** Bobby Manshack, President, North Orange Water & Sewer, LLC, 10406 North Highway 87, Orange, Texas 77632 Buford Mooney, Director, North Orange Water & Sewer, LLC, 10406 North Highway 87, Orange, Texas 77632

Respondent's Attorney: N/A

COMMISSION COMPANIS COMMISSION COMPANIS	Policy R	Pe Revision 2 (September	nalty Calc	ulatio	n Worksh	neet (PC	-	evision Octobei	r 30, 2008
DATES	Assigned	1-Apr-2019							
	PCW		Screening 10-	Apr-2019	EPA Due				
DESDO	NDENT/EACTLT	TY INFORMATI	<u>ON</u>						
KLSF U			ater & Sewer, LLC	("Facility I	No. 1")				
	g. Ent. Ref. No.	RN102078136		· · · · · ·			-		
Facili	ty/Site Region	10-Beaumont			Major/M	linor Source	Minor		
CASE I	NFORMATION								
	f./Case ID No.	50415			No. c	of Violations	1		I
		2019-1559-MWD)-Е			Order Type	Findings		İ
Med	lia Program(s)	Water Quality			Government	•			+
	Multi-Media				Enf.		Steven Van La Enforcement		-
Adr	nin. Penalty \$ I	Limit Minimum	\$0 Max	imum	\$10,000		Linorcement		1
			•		tion Section	on			
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation bas	e penalt	ies)		Subtotal 1		\$1,000
	STMENTS (+	/-) TO SUBTO	ΟΤΔΙ 1						
	Subtotals 2-7 are of	otained by multiplying	the Total Base Penalty	(Subtotal 1) by the indicated p			,	
	Compliance Hi	story		20.0%	Adjustment	Subto	tals 2, 3, & 7		\$200
	Notes	Enhance	ment for four mor	nths of self	-reported violat	ions.			
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Re	spondent does not	t meet the	culpability crite	eria.			
	Good Faith Eff	ort to Comply T	otal Adjustment	S			Subtotal 5		\$0
	Economic Ben	efit		50.0%	Enhancement*		Subtotal 6		\$500
		Total EB Amounts Cost of Compliance	\$20,340 \$40,000		d at the Total EB \$ A	Amount			
SUM C	OF SUBTOTA	LS 1-7				F	inal Subtotal		\$1,700
			IAY REQUIRE		0.0%		Adjustment		\$0
Reduces of	or enhances the Final	Subtotal by the indic	cated percentage.				1		
	Notes								
						Final Per	alty Amount		\$1,700
STATU	JTORY LIMI	ADJUSTMEN	IT			Final Asse	ssed Penalty		\$1,700
DEFER	RRAL				0.0%	Reduction	Adjustment		\$0
		nalty by the indicated	l percentage.				1		
	Notes	No c	leferral is recomm	ended for	Findings Orders				
PAYA	BLE PENALT	r					-		\$1,700

	Enf. Coo	ordinator Steven Van Landingham		
		Compliance History Worksheet		
> 0	Compliance Histo Component	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>)	4	20%
		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%
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
	Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
	Emissions	Chronic excessive emissions events (number of events)	0	0%
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
		Environmental management systems in place for one year or more	No	0%
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
		Participation in a voluntary pollution reduction program	No	0%
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
		Adjustment Per	centage (Sub	total 2)
>> R	Repeat Violator	(Subtotal 3)		
	No	Adjustment Per	centage (Sub	total 3)
>> C	Compliance Histo	ory Person Classification (Subtotal 7)		
	Satisfactory	Performer Adjustment Per	centage (Sub	total 7)
>> C	Compliance Histo	ory Summary		
	Compliance History Notes	Enhancement for four months of self-reported violations.		
		Total Adjustment Deveentage /	Subtatala 2	<u>.</u>

Total Adjustment Percentage (Subtotals 2, 3, & 7) 20%

PCW

Screening Date 10-Apr-2019 Docket No. 2019-1559-MWD-
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Respondent North Orange Water & Sewer, LLC ("Facility No. 1")

Case ID No. 50415

Reg. Ent. Reference No. RN102078136

Media Water Quality

Policy Revision 2 (September 2002) PCW Revision October 30, 2008

		ening Date			2019-1559-MWD-E		PCW
		Case ID No.	North Orange Water & Sewe 50415	er, LLC ("Facility No. 1")			ion 2 (September 2002) vision October 30, 2008
Reg.		ference No.	RN102078136				,
	Enf. C		Water Quality Steven Van Landingham				
		ation Number					
		Rule Cite(s)		305.125(1) and (5), and TPDES") Permit No. WQ Requirements No. 1	0011589001, Operatio		
	Violatio	n Description		b. 1 and all of its system perated and maintained. Ighout the first and seco	Specifically, corrosion		
					Base	e Penalty	\$10,000
>> Env	vironme	ntal, Propei	r <mark>ty and Human Health</mark> _{Harm}	n Matrix			
		Release		Minor			
OR		Actual Potential		x	Percent 5%		
					· · · · · .		
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor			
					Percent 0%		
	Matrix Notes		h or the environment will or t exceed levels that are prot resu				
				Ad	ljustment	\$9,500	
					-		\$500
Violati	on Even	ta					4300
Violatio			/iolation Events 2	70	Number of violation	days	
			daily weekly monthly quarterly semiannual annual single event x		Violation Base	e Penalty	\$1,000
		т	wo single events are recomr	nended, one event for ea	ach aeration basin.		
Good F	aith Effe	orts to Com				Reduction	\$0
			Before NOV Extraordinary	NOV to EDPRP/Settlement	Offer		
			Ordinary]		
			N/A ×	<u>I</u>			
			Notes The Respond	dent does not meet the g this violation.	good faith criteria for		
					Violation	Subtotal	\$1,000
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	Test	
		Estimate	ed EB Amount	\$20,340	Violation Final Pena	alty Total	\$1,700
			This vio	lation Final Assessed	Penalty (adjusted f	or limits)	\$1,700

	E	conomic	Benefit	Wo	rksheet		
Respondent		Water & Sewer, L					
Case ID No.		water & Sewer, L)			
Reg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of
Violation No.	. 1						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Them Description		Bute Required	That Dute		Interest Savea		LD Amount
Item Description							
Delayed Costs	i			-			
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
Design in Case in		i i		0.00	<u>+0</u>		÷0
Permit Costs	¢40.000	25 Ech 2010	25 Apr 2020	0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$40,000	25-Feb-2010	25-Apr-2020	0.00 10.17	\$0 \$20,340	n/a n/a	\$0 \$20,340
				10.17	\$20,340		\$20,340
	Estimated cos	st to remove the r	rust/delaminatio	10.17 n and r	\$20,340 epaint two of the t	n/a hree aeration basin	\$20,340 s (\$20,000 per
Other (as needed)	Estimated cos	st to remove the r	rust/delaminatio	10.17 n and r	\$20,340 epaint two of the t n date and the Fina	n/a	\$20,340 s (\$20,000 per
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Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated cos unit). The	at to remove the r Date Required is	rust/delaminatic the initial inve	10.17 on and r stigatior compli	\$20,340 epaint two of the t n date and the Fina ance. item (except for	n/a hree aeration basin al Date is the estima r one-time avoide	\$20,340 s (\$20,000 per ated date of d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated cos unit). The	at to remove the r Date Required is	rust/delaminatic the initial inve	10.17 n and r stigation compli tering 0.00	\$20,340 epaint two of the t n date and the Fina ance. item (except for \$0	n/a hree aeration basin al Date is the estima r one-time avoide \$0	\$20,340 s (\$20,000 per ated date of d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cos unit). The	at to remove the r Date Required is	rust/delaminatic the initial inve	10.17 n and r stigation compli tering 0.00 0.00	\$20,340 epaint two of the to date and the Fina ance. item (except for \$0 \$0	n/a hree aeration basin al Date is the estima one-time avoide \$0 \$0	\$20,340 s (\$20,000 per ated date of d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated cos unit). The	t to remove the r Date Required is	rust/delaminatic the initial inve	10.17 n and r stigatior compli tering 0.00 0.00 0.00	\$20,340 epaint two of the to date and the Fina ance. item (except for \$0 \$0 \$0	n/a hree aeration basin al Date is the estima one-time avoide \$0 \$0 \$0	\$20,340 s (\$20,000 per ated date of d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated cos unit). The	t to remove the r Date Required is	rust/delaminatic the initial inve	10.17 n and r stigatior compli tering 0.00 0.00 0.00 0.00	\$20,340 epaint two of the to date and the Fina ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a hree aeration basin al Date is the estima r one-time avoide \$0 \$0 \$0 \$0 \$0	\$20,340 s (\$20,000 per ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated cos unit). The	t to remove the r Date Required is	rust/delaminatic the initial inve	10.17 n and r stigatior compli ntering 0.00 0.00 0.00 0.00	\$20,340 epaint two of the to date and the Fina ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a hree aeration basin al Date is the estima r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$20,340 s (\$20,000 per ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
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Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated cos unit). The	t to remove the r Date Required is	rust/delaminatic the initial inve	10.17 n and r stigatior compli tering 0.00 0.00 0.00 0.00 0.00	\$20,340 epaint two of the to date and the Fina ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a hree aeration basin al Date is the estima r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$20,340 s (\$20,000 per ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
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Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated cos unit). The	t to remove the r Date Required is	rust/delaminatic the initial inve	10.17 n and r stigatior compli tering 0.00 0.00 0.00 0.00 0.00	\$20,340 epaint two of the to date and the Fina ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a hree aeration basin al Date is the estima r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$20,340 s (\$20,000 per ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Policy Revision 4 (Ap		nalty Calc	ulatio	n Worksh	neet (PC		Revision March 26, 2014
TCEQ DATES	Assigned	1-Apr-2019						
	PCW		Screening 10-	Apr-2019	EPA Due			
RESPO	NDENT/FACILI	TY INFORMATIO	DN					
	Respondent	North Orange Wa		("Facility I	No. 1")			
Reg Facili	g. Ent. Ref. No. ty/Site Region	RN102078136			Major/M	linor Source	Minor	
	-	To Beaumone						
	NFORMATION f./Case ID No.	50/15			No. c	of Violations	11	
		2019-1559-MWD	-E		NO. C	Order Type		
Med	lia Program(s)	Water Quality			Government	•		
	Multi-Media				Enf.		Steven Van La Enforcement	
Adı	nin. Penalty \$ I	Limit Minimum	\$0 Max	imum [\$25,000	200104		
			Penalty C	Calcula	tion Section	on		
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation bas	e penalt	ies)		Subtotal 1	\$48,500
ADJU	STMENTS (+	/-) TO SUBTO	TAL 1					
	Subtotals 2-7 are of	btained by multiplying	the Total Base Penalty	, ,	, , .	2		±0.70
	Compliance Hi	story		20.0%	Adjustment	Subto	tals 2, 3, & 7	\$9,700
	Notes	Enhance	ment for four mor	nths of self	-reported violat	ions.		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$(
	Notes	The Res	spondent does not	t meet the	culpability crite	ria.		
	Good Faith Eff	ort to Comply To	otal Adjustment	S			Subtotal 5	-\$2,875
		- C.L					Culture to L C	
	Economic Ben	Total EB Amounts	\$9,669		Enhancement* d at the Total EB \$ A	Amount	Subtotal 6	\$0
	Estimated	Cost of Compliance	\$131,175					
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$55,325
		AS JUSTICE M		[0.0%		Adjustment	\$(
Reduces	or enhances the Final	Subtotal by the indic	ated percentage.				1	
	Notes							
						Final Pen	alty Amount	\$55,325
STAT	UTORY LIMIT	ADJUSTMEN	Т			Final Asse	ssed Penalty	\$55,325
DEFE	RRAI				0.0%	Reduction	Adjustment	\$(
		nalty by the indicated	percentage.		0.070	Reduction	Aujustinent	Ţ
	Notes	No d	eferral is recomm	ended for	Findings Orders			
DAVA								455 DO
PATA	BLE PENALT							\$55,325

		without a denial of liability, or default orders of this state or the federa government, or any final prohibitory emergency orders issued by the commission		0%	
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denia of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)		0%	
	and Consent 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%	
	Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		0%	
	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</i> <i>disclosed</i>)		0%	I
		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%	
		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%	1
		Adjustment Pe	rcentage (Sub	total 2)	20%
>> Re	peat Violator	(Subtotal 3)			
	No	Adjustment Pe	rcentage (Sub	ototal 3)	0%
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)			
	Satisfactory	Performer Adjustment Pe	rcentage (Sub	ototal 7)	0%
>> Co	mpliance Hist	ory Summary			
	Compliance History Notes	Enhancement for four months of self-reported violations.			
>> Fina	al Compliance	Total Compliance History Adjustment Percentage (History Adjustment	Subtotals 2,	3, & 7)	20%
		Final Adjustment Percent	tage *capped	at 100%	20%

Compliance History Worksheet Compliance History Site Enhancement (Subtotal 2)

Written notices of violation ("NOVs") with same or similar violations as those in

Any agreed final enforcement orders containing a denial of liability (number of

Any adjudicated final enforcement orders, agreed final enforcement orders

the current enforcement action (number of NOVs meeting criteria)

Docket No. 2019-1559-MWD-E

Screening Date 10-Apr-2019 **Respondent** North Orange Water & Sewer, LLC ("Facility No. 1")

Case ID No. 50415

Number of...

Other written NOVs

orders meeting criteria)

>>

Component

NOVs

Orders

Reg. Ent. Reference No. RN102078136

Media Water Quality

Enf. Coordinator Steven Van Landingham

Number

4

0

0

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

Adjust.

20%

0%

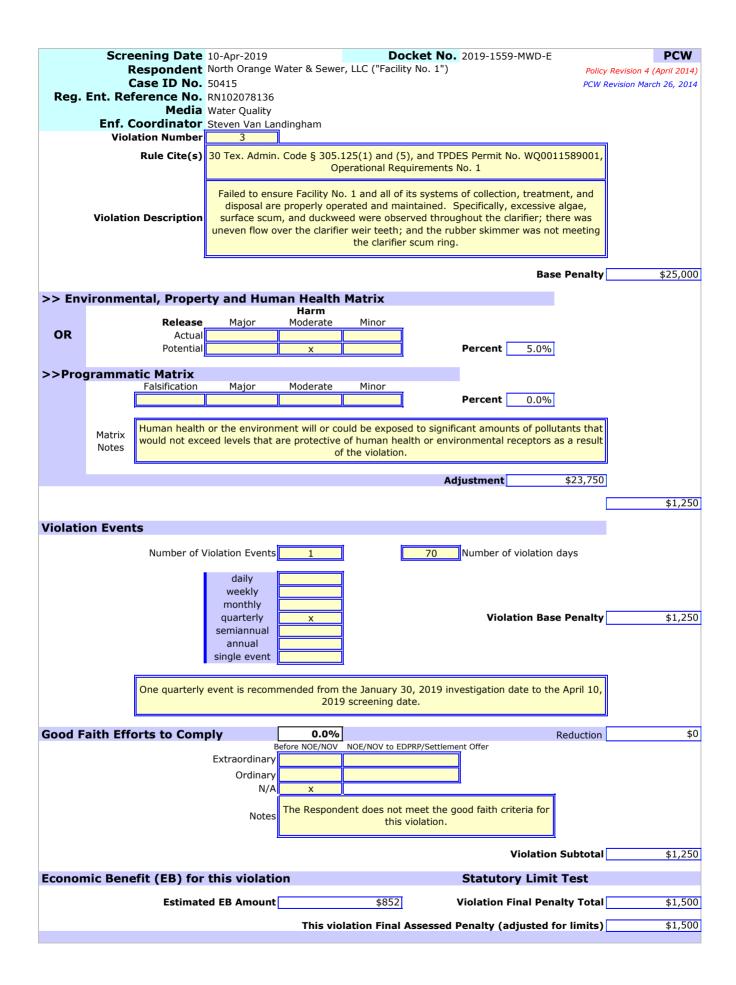
0%

		ening Date	10-Apr-2019 North Orange V	Nator & Sower		cket No. 2019-1559-		PCW
		Case ID No.		Malei & Sewei	, LLC (Facili	(y NO. 1)		Revision 4 (April 2014) Levision March 26, 2014
Reg.	Ent. Ref	ference No.						, i i i i i i i i i i i i i i i i i i i
	Enf (Water Quality Steven Van Lar	adiaabam				
		ation Number	Steven van Lar	naingnam				
		Rule Cite(s)	30 Tex. Ac	lmin. Code § 3	305.125(1) a	nd (5), and Texas Pollut	ant Discharge	
					PDES") Perm	nit No. WQ0011589001, ents No. 1		
					Requirem			
	Violatio	n Description	disposal ar delaminatior	re properly open were observe pers, and the s	erated and m ed throughou sludge digest	its systems of collection aintained. Specifically, t the third aeration basi er; and rust and corrosio ine in the clarifier.	corrosion and n, both chlorine	
							Base Penalty	\$25,000
>> Env	vironme	ntal, Propei	ty and Hum		Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual						
		Potential			Х	Percent	3.0%	
>>Pro	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor	Deveent	0.00/	
						Percent	0.0%	
	Matrix Notes			that are prote		sed to insignificant amount of the second se		
						Aujustment	ψ Ζ Ψ,ΖΟΟ	
								\$750
Violati	on Even	ts						
		Number of N	iolation Events	5		70 Number of v	iolation days	
			daily weekly monthly quarterly semiannual annual single event			Violati	on Base Penalty	\$3,750
			Five single e	events are reco	ommended (o	one event for each unit)		
Good F	aith Effe	orts to Com		0.0%			Reduction	\$0
			Extraordinary	Before NOE/NOV	NOE/NOV to E	DPRP/Settlement Offer		
			Ordinary					
			N/A				i	
			Notes	The Responde		meet the good faith crit violation.	eria for	
						Vi	iolation Subtotal	\$3,750
Econor	nic Bene	efit (EB) for	this violation	on		Statutory	/ Limit Test	
			ed EB Amount		\$7,747		nal Penalty Total	\$4,500
		Lotindu						
				This viola	ation Final A	Assessed Penalty (adj	usted for limits)	\$4,500

	E	conomic	Benefit	Wo	rksheet		
	-	Water & Sewer, L	LC ("Facility No	. 1")			
Case ID No.							
Reg. Ent. Reference No.							Namua of
Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
violation No.	1					F 0	
		Data Daminut	Eliza I Data	N.	T	5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Delayed Costs Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Other (as needed)	\$20,000	6-Jul-2017	25-Apr-2020	2.81	\$2,805	n/a	\$2,805
Other (as needed)	\$80,000	30-Jan-2019	25-Apr-2020	1.24	\$4,942	n/a	\$4,942
Notes for DELAYED costs	Estimated of	cost to remove th	e corrosion/dela	compli iminatio	ance. In and repaint the	al Date is the estima third aeration basin 0 per unit). The Da	, the second
	th	e latest investigat	ion date and th	e Final	Date is the estima	ted date of compliar	nce.
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	• • •	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 Other (as needed)				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Notes for AVOIDED costs		JJ		0.00	50	<u>\$0</u>	<u> </u>
Approx. Cost of Compliance		\$100,000			TOTAL		\$7,74

		ening Date	10-Apr-2019 North Orange Water & Sewe		2019-1559-MWD-E	PCW
		Case ID No.				Policy Revision 4 (April 2014) PCW Revision March 26, 2014
Reg.	Ent. Ref		RN102078136			
	Enf. C		Water Quality Steven Van Landingham			
		ation Number	2			
		Rule Cite(s)	-	5.125(1) and (5), Tex. W /Q0011589001, Operatio		
	Violatio	n Description	Failed to ensure Facility N disposal are properly operat an aeration basin		cifically, a sludge retur	
					Base	Penalty \$25,000
>> Env	vironme	ntal, Propei	ty and Human Health	Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual		X	Percent 5.0%	
		Potential		<u> </u>	Percent 5.0%	
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor		
					Percent 0.0%	
	Matrix Notes	Human heal	th or the environment has be resu	en exposed to insignificate to insignificate to insignificate to the violation.	ant amounts of pollutan	its as a
				Ac	ljustment	\$23,750
						\$1,250
	_					φ1,230
Violati	on Event	ts				
		Number of \	/iolation Events 1	70	Number of violation d	lays
			daily weekly			
			monthly quarterly x		Violation Base	Penalty \$1,250
			semiannual			
			annual single event			
				<u>ط</u>		
		One quarterly	event is recommended from 201	the January 30, 2019 in 9 screening date.	vestigation date to the	April 10,
Good F	aith Effo	orts to Com	ply 0.0%		R	Reduction \$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlem	ent Offer	
			Ordinary			
			N/A x			
			Notes The Respon	dent does not meet the g this violation.	good faith criteria for	
					Violation	Subtotal \$1,250
Econor	mic Bene	efit (EB) for	this violation		Statutory Limit	Test
		Estimate	ed EB Amount	\$13	Violation Final Pena	Ity Total \$1,500
				blation Final Assessed		
				ACTION FINAL ASSESSED	renaity (aujusteu to	\$1,500

	E	conomic	Benefit	Wo	rksheet		
Respondent	North Orange	Water & Sewer, L	I C ("Facility No	1")			
Case ID No.	-	natel a senel, E		,			
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		Bute Requireu	That Bate		Interest Sureu		ED / moune
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs							
· · ·	+250	20.1 2010		0.00	\$0	n/a	\$0
Other (as needed)	\$250 Estimated co	30-Jan-2019	25-Feb-2020	1.07	\$13	n/a	\$13
Notes for DELAYED costs	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 e. The timated	\$13 Date Required is t date of complianc	n/a he investigation dat e.	\$13 e and the Final
Notes for DELAYED costs	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 e. The timated	\$13 Date Required is th date of complianc item (except for	n/a he investigation date re. r one-time avoide	\$13 e and the Final d costs)
Notes for DELAYED costs Avoided Costs Disposal	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 e. The timated tering	\$13 Date Required is the date of compliance item (except for \$0	n/a he investigation dat e. r one-time avoide \$0	\$13 e and the Final d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 e. The timated tering 0.00 0.00	\$13 Date Required is to date of compliance item (except for \$0 \$0	n/a he investigation date re. r one-time avoide \$0 \$0	\$13 e and the Final d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 timated timated 0.00 0.00 0.00	\$13 Date Required is t date of compliance item (except for \$0 \$0 \$0	n/a he investigation date re. r one-time avoide \$0 \$0 \$0	\$13 e and the Final d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 timated timated 0.00 0.00 0.00 0.00	\$13 Date Required is to date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he investigation date re. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$13 e and the Final d costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 timated to the timated 0.00 0.00 0.00 0.00 0.00	\$13 Date Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he investigation date re. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$13 e and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 timated 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$13 Date Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a he investigation data re. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$13 e and the Final a costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 timated to the timated 0.00 0.00 0.00 0.00 0.00	\$13 Date Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he investigation date re. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$13 e and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co	st to repair the slu	udge return pipe Date is the es	1.07 timated 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$13 Date Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a he investigation data re. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$13 e and the Final a costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



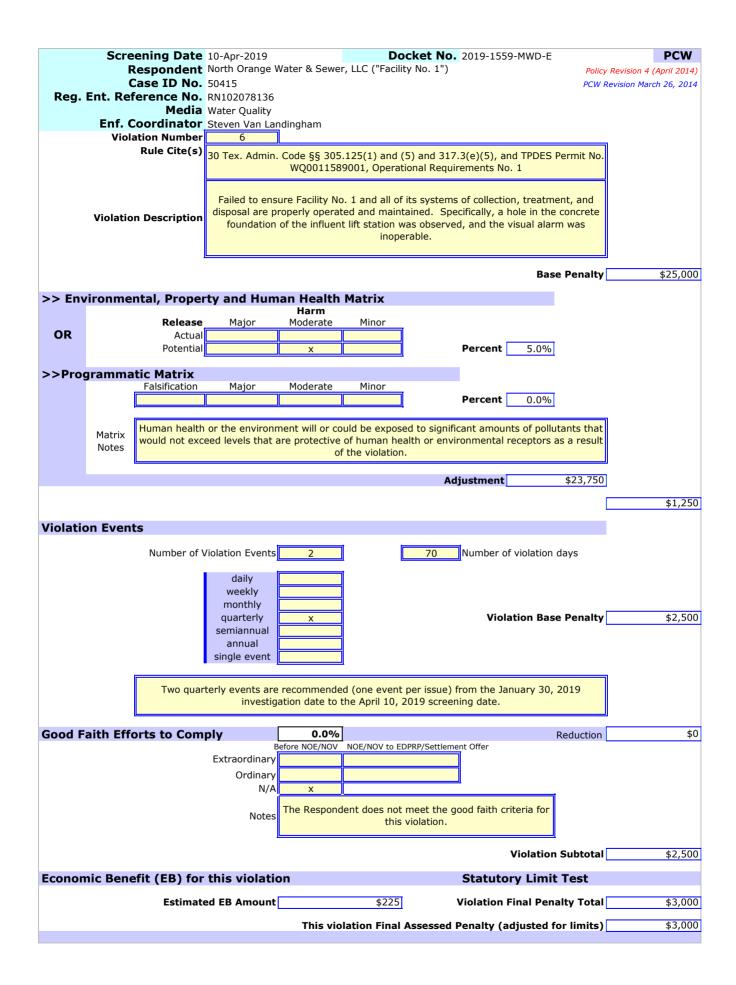
Case ID No.			ζ, γ	,			
eg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
						5.0	
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l						
Delayed Costs							
Equipment	\$1,000	30-Jan-2019	25-Feb-2020	1.07	\$4	\$71	\$75
Buildings	\$1,000	<u>50 Juli 2015</u>	23100 2020	0.00	\$0	\$0	<u>\$0</u>
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$10,000	30-Jan-2019	25-Feb-2020	1.07	\$36	\$714	\$750
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	1500			0.00	\$0	n/a	\$0
Remediation/Disposal	\$500	30-Jan-2019	25-Feb-2020	1.07	\$27	n/a	\$27
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	<u>\$0</u> \$0
				compli			
Notes for DELAYED costs	Date Re Estimated	equired is the inve Remediation/Disp	uction cost to er stigation date a losal cost to rem	compli nsure ex nd the nove ex vestigat	ance. ven flow over the o Final Date is the e cess algae, surface ion date and the F	clarifier weir teeth (s stimated date of con e scum, and duckwe inal Date is the estin	10,000). The mpliance.
	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compli nsure ev nd the nove ex vestigat compli	ance. ven flow over the o Final Date is the e cess algae, surfaco ion date and the F ance.	clarifier weir teeth (s stimated date of con e scum, and duckwe inal Date is the estin	10,000). The npliance. ed from the nated date of
Avoided Costs	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compli nsure ev nd the nove ex vestigat compli	ance. ven flow over the o Final Date is the e cess algae, surface ion date and the F ance. item (except for	clarifier weir teeth (s stimated date of con e scum, and duckwe inal Date is the estin r one-time avoide	10,000). The npliance. ed from the nated date of d costs)
	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compli nsure ev nd the nove ex vestigat compli	ance. ven flow over the o Final Date is the e cess algae, surfaco ion date and the F ance.	clarifier weir teeth (s stimated date of con e scum, and duckwe inal Date is the estin	10,000). The npliance. ed from the nated date of
Avoided Costs Disposal Personnel	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compli nsure ev nd the nove ex vestigat compli tering	ance. ven flow over the o Final Date is the e cess algae, surface ion date and the F ance. item (except for \$0	clarifier weir teeth (s stimated date of con e scum, and duckwe inal Date is the estin r one-time avoide \$0	\$10,000). The npliance. ned from the nated date of d costs) \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compli nsure ex- nove ex- vestigat compli 0.00 0.00 0.00 0.00	ance. Final Date is the e cess algae, surface ion date and the F ance. item (except for \$0 \$0 \$0 \$0 \$0	clarifier weir teeth (s stimated date of cor e scum, and duckwe inal Date is the estin r one-time avoide \$0 \$0 \$0 \$0 \$0	\$10,000). The npliance. The from the nated date of the form the so \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compli nsure evand the nove exvestigat compli 0.00 0.00 0.00 0.00 0.00	ance. Final Date is the e cess algae, surface ion date and the F ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	clarifier weir teeth (s stimated date of cor e scum, and duckwe inal Date is the estin r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$10,000). The npliance. ed from the nated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compliants of the complexity o	ance. ven flow over the of Final Date is the e cess algae, surface ion date and the F ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	clarifier weir teeth (s stimated date of con e scum, and duckwe inal Date is the estin r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$10,000). The npliance. ed from the nated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compli nsure evand the nove exvestigat compli 0.00 0.00 0.00 0.00 0.00	ance. Final Date is the e cess algae, surface ion date and the F ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	clarifier weir teeth (s stimated date of cor e scum, and duckwe inal Date is the estin r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$10,000). The npliance. ed from the nated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Date Re Estimated clarifier (\$50	equired is the inve Remediation/Disp 00). The Date Re	uction cost to er stigation date a osal cost to rem quired is the inv	compliants of the complexity o	ance. ven flow over the of Final Date is the e cess algae, surface ion date and the F ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	clarifier weir teeth (s stimated date of con e scum, and duckwe inal Date is the estin r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$10,000). The npliance. ed from the nated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Docket No. 201	9-1559-MWD-E	PCW
		lespondent Case ID No.	North Orange Wate	r & Sewer, LLC ("Fa	acility No. 1")		Policy Revision 4 (April 2014)
Reg.		erence No.					PCW Revision March 26, 2014
			Water Quality				
		coordinator	Steven Van Landing	Jham			
	VION		I	to 5 205 125(1) an		ermit No. WQ0011589	001
		Rule Cite(S)	So Tex. Admin. Co		Requirements No. 1		
	Violatio	n Description		erly operated and m		ollection, treatment, a ally, the ventilation far	
						Base Pen	alty \$25,000
>> Env	vironme	ntal, Propei	rty and Human				
		Release		Harm oderate Minor			
OR		Actual					
		Potential	X		Per	rcent 15.0%	
>>Pro	gramma	tic Matrix					
		Falsification	Major M	oderate Minor	Bor	cent 0.0%	
					Per	cent 0.0%	
	Matrix Notes					that would exceed lev result of the violation.	
					Adjusti	ment \$21	,250
					, ajusti	φ21	
							\$3,750
Violati	on Even	ts					
		Number of \	/iolation Events	3	70 Num	nber of violation days	
			daily weekly				
			monthly	x			
			quarterly			Violation Base Pen	alty \$11,250
			semiannual annual				
			single event				
		Three monthl	y events are recomn	nended from the Ja 10, 2019 screen		estigation date to the A	April
Good F	Faith Eff	orts to Com	ply	10.0%		Reduc	tion \$1,125
Good I			Before		to EDPRP/Settlement Off		<i>\</i>
			Extraordinary				
			Ordinary N/A		x		
			Notes The	Respondent achiev	ved compliance by A	August 7, 2019.	
						Violation Subt	sotal \$10,125
Econor	mic Bene	efit (EB) for	this violation		Sta	atutory Limit Tes	t
		Estimat	ed EB Amount		to Viela		
		Lotiniati			\$9 Viola	ation Final Penalty T	otal \$12,375

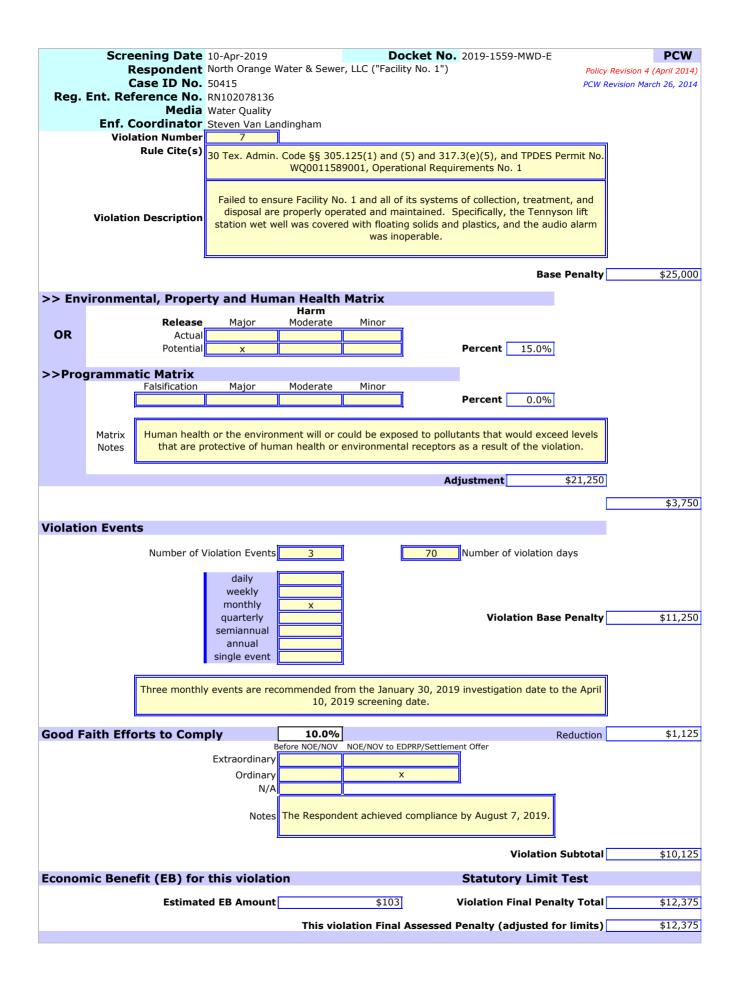
	E	conomic	Benefit	Wo	rksheet		
Respondent	North Orange	Water & Sewer, L	I.C. ("Facility No	. 1")			
Case ID No.	-		20 (1 00	/			
Reg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of
Violation No.	4						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs		20.1	7 Aug 2010		+0	+0	+0
Equipment	\$250	30-Jan-2019	7-Aug-2019	0.52	\$0	\$9	\$9
Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed) Engineering/Construction				0.00	\$0 \$0	\$0 \$0	\$0
Engineering/Construction Land				0.00	\$0 \$0	 n/a	\$0 \$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
	Estimated Ed	quinment cost to r	enlace the ven	tilation	fan in the chlorine	closet The Date R	equired is the
Notes for DELAYED costs		investiga	ation date and	he Fina	I Date is the comp		
Avoided Costs		investiga	ation date and	he Fina	I Date is the comp item (except for	liance date.	d costs)
Avoided Costs Disposal		investiga	ation date and	tering	I Date is the comp item (except for \$0	liance date. r one-time avoide \$0	d costs) \$0
Avoided Costs Disposal Personnel		investiga	ation date and	tering	I Date is the comp item (except for \$0 \$0	liance date. r one-time avoide \$0 \$0	d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		investiga	ation date and	tering 0.00 0.00 0.00	Date is the comp item (except for \$0 \$0 \$0 \$0 \$0	liance date. r one-time avoide \$0 \$0 \$0	d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment		investiga	ation date and	he Fina 0.00 0.00 0.00 0.00	Date is the comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance date. r one-time avoide \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		investiga	ation date and	he Fina 0.00 0.00 0.00 0.00 0.00	Date is the comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		investiga	ation date and	he Fina 0.00 0.00 0.00 0.00 0.00 0.00	Date is the comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		investiga	ation date and	he Fina 0.00 0.00 0.00 0.00 0.00	Date is the comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		investiga	ation date and	he Fina 0.00 0.00 0.00 0.00 0.00 0.00	Date is the comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	liance date. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			cket No. 2019-1559-MWD-E		PCW
		lespondent Case ID No.	North Orange Water & Sew 50415	ver, LLC ("Facility	y No. 1")		Revision 4 (April 2014) Revision March 26, 2014
Reg.		ference No.	RN102078136				
	Enf (Water Quality Steven Van Landingham				
		ation Number					
		Rule Cite(s)	30 Tex. Admin. Code § 30	5.125(1) and (5`), and TPDES Permit No. WQ003	11589001,	
				Operational Requ		, i	
			Failed to ensure Facility	No. 1 and all of i	ts systems of collection, treatm	ent, and	
			chloring contact chamber		ntained. Specifically, the above not of sludge out of a total wate		
	Violatio	n Description	seven feet and the grou	nd-level chlorine	contact chamber contained on	e foot of	
			-		e feet. Also, duckweed, foam, a prine contact chambers.	nd algae	
					Bas	e Penalty	\$25,000
>> Env	vironme	ntal, Propei	rty and Human Healt _{Harm}	h Matrix			
		Release		Minor			
OR		Actual Potential			Percent 5.0%		
		rotentia	^				
>>Prog	gramma	tic Matrix Falsification	Major Moderate	Minor			
					Percent 0.0%		
							1
	Matrix				d to significant amounts of pollu Ith or environmental receptors		
	Notes		· · · · · · · · · · · · · · · · · · ·	of the violation.			
					Adjustment	\$23,750	
						+/	¢1.2E0
							\$1,250
Violatio	on Even	ts					
		Number of \	Violation Events 2		70 Number of violation	days	
			daily	-			
			weekly				
			monthly quarterly x	_	Violation Bas	e Penaltv	\$2,500
			semiannual		Violation Bas	e r enarcy	<i>ψ2,500</i>
			annual single event	_			
			Single event	_			
				• • •	event for each chlorine contact of		
		from t	the January 30, 2019 invest	igation date to t	he April 10, 2019 screening dat	æ.	
Good F	aith Effe	orts to Com	ply 0.0%	%		Reduction	\$0
			Before NOE/NO Extraordinary	V NOE/NOV to EDI	PRP/Settlement Offer		
			Ordinary				
			N/A x			r	
			Notes The Respo	ndent does not r	meet the good faith criteria for		
			Notes	this v	violation.		
			·		Violatior	n Subtotal	\$2,500
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	t Test	
			ed EB Amount	\$268	Violation Final Pen		\$3,000
		Lound	<u> </u>			-	
			This v	iolation Final A	Assessed Penalty (adjusted f	or limits)	\$3,000

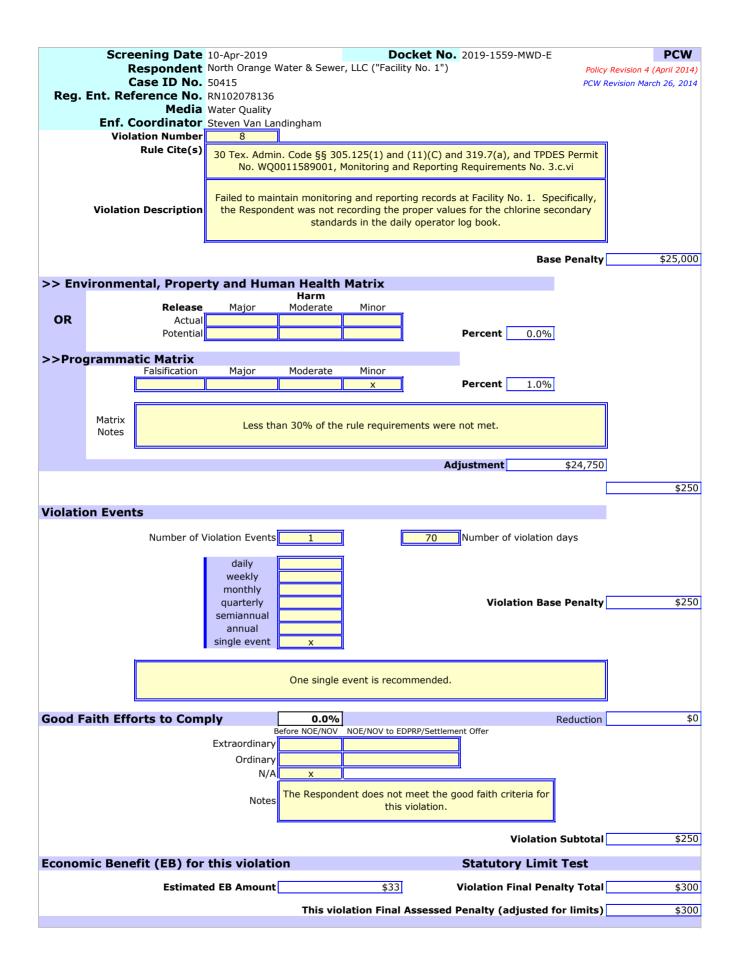
		conomic	Benefit	Wo	rksheet		
Respondent	North Orange	Water & Sewer, L	LC ("Facility No	. 1")			
Case ID No.	-			/			
Reg. Ent. Reference No.							
5							Years of
	Water Quality					Percent Interest	
Violation No.	5						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
	•						
Delayed Center							
Delayed Costs	·	1			±0	±0	¢0
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$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	\$5,000	30-Jan-2019	25-Feb-2020	1.07	\$268	n/a	\$268
Permit Costs						'	
				0.00	\$0	n/a	\$0
Other (as needed)	Estimated Rer	nediation/Disposa	l cost to remove	0.00	\$0 \$0 roperly dispose of	n/a n/a sludge, duckweed, f	\$0 \$0 Toam, and alga
Notes for DELAYED costs	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of	\$0 roperly dispose of red is the investig compliance date.	n/a sludge, duckweed, f ation date and the F	\$0 oam, and algad inal Date is the
Notes for DELAYED costs	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of tering	\$0 roperly dispose of red is the investig compliance date. item (except for	n/a sludge, duckweed, f ation date and the F r one-time avoide	\$0 ioam, and algae inal Date is the d costs)
Notes for DELAYED costs Avoided Costs Disposal	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of tering 0.00	\$0 roperly dispose of red is the investig compliance date. item (except for \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0	\$0 foam, and algae inal Date is the d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	from both chlo	orine contact char	nbers. The Dat estimated	e and present of the second se	\$0 roperly dispose of red is the investig compliance date. item (except for \$0 \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0 \$0	\$0 oam, and algae inal Date is the d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of tering 0.00 0.00 0.00	\$0 operly dispose of red is the investig compliance date. item (except for \$0 \$0 \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0 \$0 \$0	\$0 ioam, and algae inal Date is the d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of tering 0.00 0.00 0.00 0.00	\$0 roperly dispose of red is the investig- compliance date. item (except for \$0 \$0 \$0 \$0 \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 oam, and algae inal Date is the d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of 0.00 0.00 0.00 0.00 0.00	\$0 roperly dispose of red is the investig- compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ooam, and algae inal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of tering 0.00 0.00 0.00 0.00 0.00	\$0 roperly dispose of red is the investig compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 boam, and algae inal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of 0.00 0.00 0.00 0.00 0.00	\$0 roperly dispose of red is the investig- compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 oam, and alga inal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	from both chlo	orine contact char	nbers. The Dat estimated	0.00 e and pr e Requi date of tering 0.00 0.00 0.00 0.00 0.00	\$0 roperly dispose of red is the investig compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a sludge, duckweed, f ation date and the F r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 oam, and algae inal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



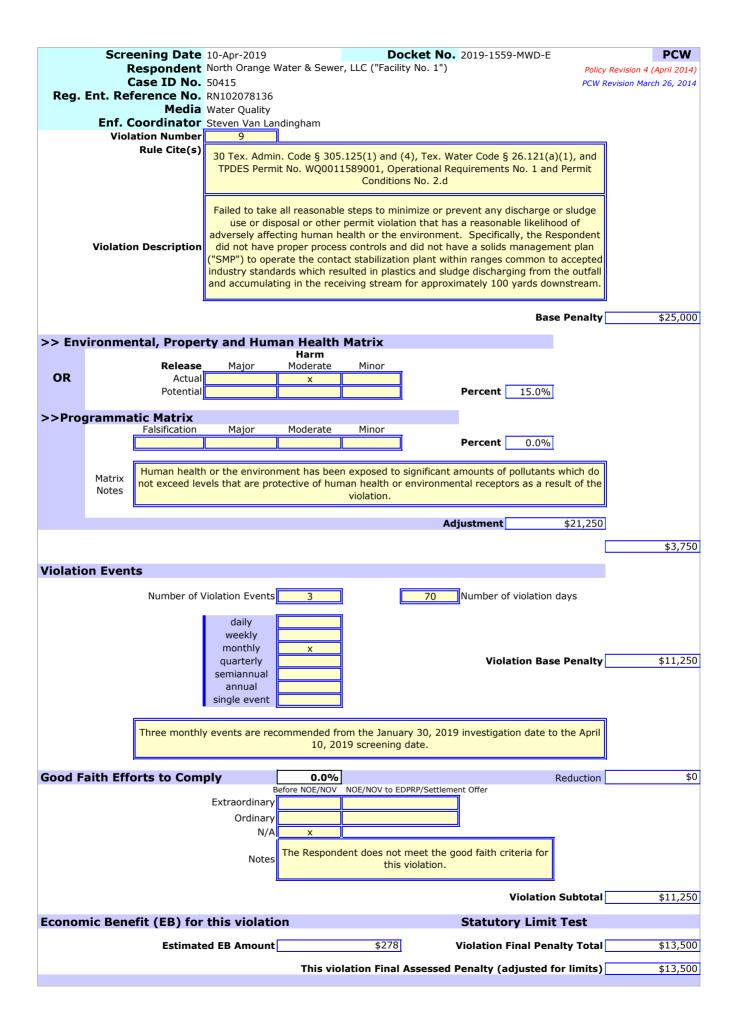
		water & Sewer, L	LC ("Facility No.	1")			
Case ID No.	50415						
eq. Ent. Reference No.							
U	Water Quality					Percent Interest	Years of Depreciation
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	\$2,500	30-Jan-2019	25-Feb-2020	1.07	\$9	\$179	\$188
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$1,000	30-Jan-2019	7-Aug-2019	0.52	\$2	\$35	\$37
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
	Lotimate					arm. The Date Reque ate of compliance.	uired is the
Notes for DELAYED costs	Estimated En	investigation d gineering/Constru	ate and the Fina	al Date pair the	is the estimated d	arm. The Date Requ ate of compliance. ion at the influent lin s the compliance da	ft station. The
	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	al Date pair the date ar	is the estimated d e concrete foundat nd the Final Date is	ate of compliance. ion at the influent li s the compliance da	ft station.The te.
Avoided Costs	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	al Date pair the date ar tering	is the estimated d concrete foundat nd the Final Date is item (except for	ate of compliance. ion at the influent li s the compliance da r one-time avoide	ft station. The te. d costs)
	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	al Date pair the date ar	is the estimated d e concrete foundat nd the Final Date is	ate of compliance. ion at the influent li s the compliance da	ft station.The te.
Avoided Costs Disposal Personnel	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	pair the date ar tering 0.00	is the estimated d e concrete foundat nd the Final Date is item (except for \$0	ate of compliance. ion at the influent lin s the compliance da r one-time avoide \$0	ft station. The te. d costs) \$0
Avoided Costs Disposal Personnel	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	pair the date ar tering 0.00 0.00	is the estimated d concrete foundat d the Final Date is item (except for \$0 \$0	ate of compliance. ion at the influent lin s the compliance da r one-time avoide \$0 \$0 \$0 \$0	ft station. The te. d costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	pair the date ar tering 0.00 0.00 0.00	is the estimated d concrete foundat d the Final Date is item (except for \$0 \$0 \$0	ate of compliance. ion at the influent lines the compliance date of the compliance date of the second secon	ft station. The te. d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	al Date pair the date ar 0.00 0.00 0.00 0.00 0.00 0.00 0.00	is the estimated d concrete foundat d the Final Date is item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ate of compliance. ion at the influent lines the compliance dates and t	ft station. The te. d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	al Date pair the date ar 0.00 0.00 0.00 0.00 0.00 0.00	is the estimated d concrete foundat d the Final Date is item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ate of compliance. ion at the influent lines the compliance dates of the compl	ft station. The te. d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated En	investigation d gineering/Constru Date Required is th	ate and the Fina uction cost to re ne investigation	al Date pair the date ar 0.00 0.00 0.00 0.00 0.00 0.00 0.00	is the estimated d concrete foundat d the Final Date is item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ate of compliance. ion at the influent lines the compliance dates and t	ft station. The te. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



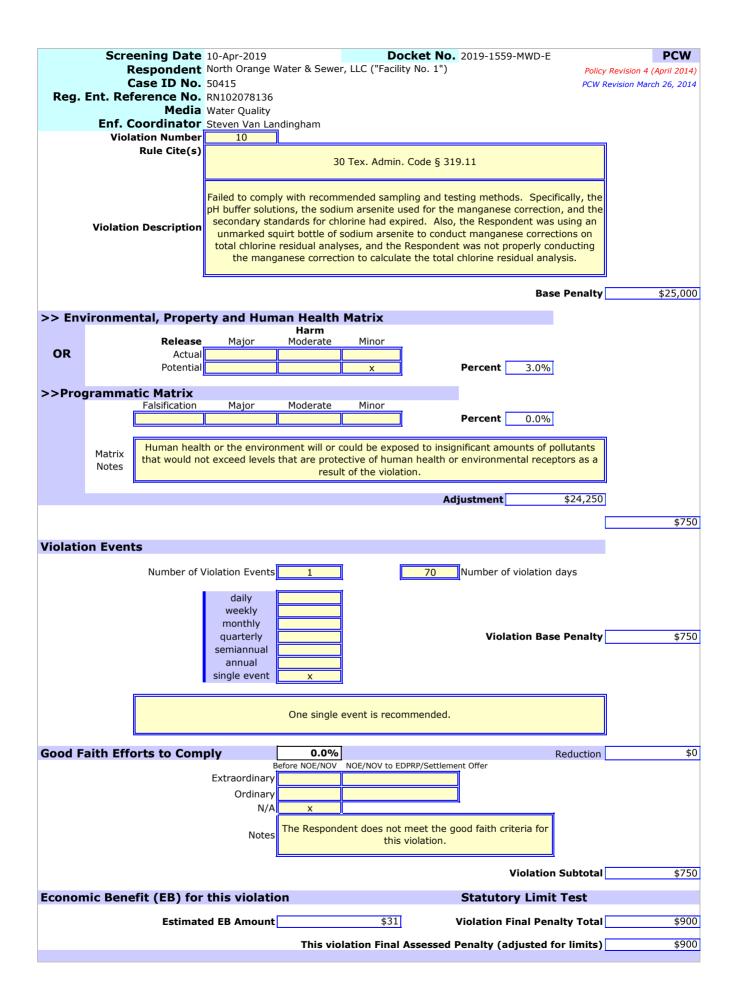
		Water & Sewer, L		L.)			
Case ID No.	50415		、	,			
eg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of Depreciation
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
	,						
Delayed Costs							
Delayed Costs	\$2,500	30-Jan-2019	7-Aug-2019	0.52	¢4	¢96	\$90
Equipment Buildings	\$2,500	30-Jan-2019	7-Aug-2019	0.52	\$4 \$0	<u>\$86</u> \$0	\$90
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Lingineering/ construction				0.00	\$0	n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0 \$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$500	30-Jan-2019	7-Aua-2019	0.52	\$13	n/a	\$13
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
		Investiga	ation date and t	he ⊦ina		liance uale.	
Notes for DELAYED costs		mediation/Dispos	al cost to remov	e the fl		the Tennyson lift st	
	The	mediation/Dispos Date Required is	al cost to remov the investigation	e the fl on date	and the Final Date	the Tennyson lift st is the compliance of	date.
Notes for DELAYED costs Avoided Costs Disposal	The	mediation/Dispos Date Required is	al cost to remov the investigation	e the fl on date	and the Final Date	the Tennyson lift st	date.
Avoided Costs	The	mediation/Dispos Date Required is	al cost to remov the investigation	e the fl on date tering	and the Final Date	the Tennyson lift st is the compliance of one-time avoide	date. d costs)
Avoided Costs Disposal Personnel	The	mediation/Dispos Date Required is	al cost to remov the investigation	e the fl n date tering 0.00	and the Final Date item (except for \$0	the Tennyson lift st is the compliance of one-time avoide \$0	date. d costs) \$0
Avoided Costs Disposal Personnel	The	mediation/Dispos Date Required is	al cost to remov the investigation	te the fl on date tering 0.00 0.00	and the Final Date item (except for \$0 \$0 \$0 \$0 \$0 \$0	the Tennyson lift st e is the compliance of one-time avoide \$0 \$0 \$0 \$0 \$0	date. d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Ispection/Reporting/Sampling	The	mediation/Dispos Date Required is	al cost to remov the investigation	e the fl on date tering 0.00 0.00 0.00	and the Final Date item (except for \$0 \$0 \$0	the Tennyson lift st is the compliance of one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	date. d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment	The	mediation/Dispos Date Required is	al cost to remov the investigation	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	and the Final Date item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the Tennyson lift st is the compliance of one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Ispection/Reporting/Sampling Supplies/Equipment Financial Assurance	The	mediation/Dispos Date Required is	al cost to remov the investigation	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	and the Final Date item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the Tennyson lift st is the compliance of one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	date. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The	mediation/Dispos Date Required is	al cost to remov the investigation	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	and the Final Date item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the Tennyson lift st is the compliance of one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Becnendent		conomic		-	Rancet		
•	-	Water & Sewer, L	LC ("Facility No	. 1")			
Case ID No.							
Reg. Ent. Reference No.	RN102078136						
Media	Water Quality						Years of
Violation No.	. 8					Percent Interest	Depreciation
						5.0	15
	Itom Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Them Description		Date Required	i mai Date	115	Interest Saveu	costs saveu	ED Amount
Item Description							
Delayed Costs	·				1 1 2		
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 \$0	n/a n/a	<u>\$0</u> \$0
Record Keeping System	\$250	6-Jul-2017	25-Feb-2020	2.64	\$33	n/a	\$33
Training/Sampling Remediation/Disposal	<u>\$230</u>	0-Jui-2017	23-FED-2020	0.00	\$0	n/a	<u>\$35</u> \$0
Permit Costs				0.00	\$0	n/a	\$0
					4 0		
Other (as needed)				0.00 nent pro		n/a uct employee trainir	\$0 ng to ensure
Other (as needed) Notes for DELAYED costs	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 nent pro dards ar and the	ocedures and cond re recorded in the Final Date is the e	n/a uct employee trainir daily operator log bo estimated date of co	\$0 ng to ensure pok. The Date mpliance.
	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 nent pro dards ar and the	ocedures and cond re recorded in the Final Date is the e	n/a uct employee trainir daily operator log bo	\$0 ng to ensure pok. The Date mpliance.
Notes for DELAYED costs	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 pent products of the product of	ocedures and cond re recorded in the Final Date is the e	n/a uct employee trainin daily operator log be estimated date of co r one-time avoide \$0	\$0 ng to ensure pok. The Date mpliance.
Notes for DELAYED costs	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 nent products and the netering 0.00 0.00	cedures and cond re recorded in the Final Date is the e item (except for \$0 \$0	n/a uct employee trainir daily operator log be estimated date of co r one-time avoider \$0 \$0	\$0 ng to ensure pok. The Date mpliance. d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 nent products and the netering 0.00 0.00 0.00	cedures and cond re recorded in the Final Date is the e item (except for \$0 \$0 \$0	n/a uct employee trainin daily operator log bo stimated date of co r one-time avoide \$0 \$0 \$0	\$0 ng to ensure pok. The Date mpliance. d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 nent products and the tering 0.00 0.00 0.00 0.00	re recorded in the Final Date is the e item (except for \$0 \$0 \$0 \$0 \$0	n/a uct employee trainin daily operator log bo stimated date of co r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 ng to ensure pok. The Date mpliance. d costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 pent pro- dards ar and the itering 0.00 0.00 0.00 0.00 0.00	re recorded in the Final Date is the e item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a uct employee trainin daily operator log bu- stimated date of cou- r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ng to ensure bok. The Date mpliance. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 ent produced dards are and the tering 0.00 0.00 0.00 0.00 0.00	cedures and cond re recorded in the Final Date is the e item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a uct employee trainin daily operator log be estimated date of con r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ng to ensure book. The Date mpliance. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 pent pro- dards ar and the itering 0.00 0.00 0.00 0.00 0.00	re recorded in the Final Date is the e item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a uct employee trainin daily operator log bu- stimated date of cou- r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ng to ensure pok. The Date mpliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	proper values Required	for the chlorine d is the initial inve	secondary standestigation date a	0.00 ent produced dards are and the tering 0.00 0.00 0.00 0.00 0.00	cedures and cond re recorded in the Final Date is the e item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a uct employee trainin daily operator log be estimated date of con r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ng to ensure book. The Date mpliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Respondent	North Orange	Water & Sewer, I	I.C. ("Facility No	1")			
Case ID No.		water & Sewer, I)			
eg. Ent. Reference No.	RN102078136	1					
Media	Water Quality					Deveent Tabaaat	Years of
Violation No.	9					Percent Interest	Depreciation
	5					5.0	15
	Itom Cost	Date Required	Final Date	Vre	Interest Saved	Costs Saved	EB Amount
		Date Required	That Date	113	Interest Saveu	COSIS Saveu	ED Amount
Item Description							
Delayed Costs				-			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$2,500	30-Jan-2019	26-Mar-2020	1.15	\$144	n/a	\$144
Remediation/Disposal	\$ 27000						
Permit Costs	<u> </u>			0.00	\$0	n/a	\$0
· ·	\$2,500 Estimated Rer	nediation/Disposa	e Required is the	1.07 and prest	\$134 roperly dispose of igation date and t	n/a n/a plastics and sludge he Final Date is the	\$134 accumulation ir
Permit Costs	\$2,500 Estimated Rer the receiving	nediation/Disposa stream. The Dat ost to develop and	al cost to remove e Required is the d i implement a Sl	1.07 e and prest of comp	\$134 roperly dispose of igation date and ti liance. acility No. 1. The	n/a plastics and sludge he Final Date is the Date Required is the	\$134 accumulation in estimated date
Permit Costs Other (as needed) Notes for DELAYED costs	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 e and pr e invest of comp MP at Fa is the e	\$134 roperly dispose of igation date and t liance. acility No. 1. The estimated date of d	n/a plastics and sludge he Final Date is the Date Required is the compliance.	\$134 accumulation ir estimated date e investigation
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and pre- invest of comp MP at Fa is the e	\$134 roperly dispose of igation date and t liance. acility No. 1. The estimated date of o item (except for	n/a plastics and sludge he Final Date is the Date Required is the compliance.	\$134 accumulation ir estimated date e investigation d costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and pre- prest of comp MP at Fa is the e tering 0.00	\$134 operly dispose of igation date and the liance. acility No. 1. The estimated date of of item (except for \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance. r one-time avoide \$0	\$134 accumulation ir estimated date e investigation d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and pre- provest of comp MP at Fa- is the e tering 0.00	\$134 operly dispose of igation date and ti liance. acility No. 1. The estimated date of item (except for \$0 \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance.	\$134 accumulation ir estimated date e investigation d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and prest of comp MP at Fa is the e tering 0.00 0.00	\$134 roperly dispose of igation date and the liance. acility No. 1. The estimated date of of item (except for \$0 \$0 \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance.	\$134 accumulation in estimated date investigation d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and prest of comp MP at Fa is the e tering 0.00 0.00 0.00	\$134 operly dispose of igation date and the liance. acility No. 1. The estimated date of of item (except for \$0 \$0 \$0 \$0 \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance. r one-time avoider \$0 \$0 \$0 \$0	\$134 accumulation in estimated date e investigation d costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and prest of comp MP at Fa is the e tering 0.00 0.00 0.00 0.00	\$134 roperly dispose of igation date and tl liance. acility No. 1. The estimated date of of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$134 accumulation in estimated date investigation a costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and pr invest f comp MP at Fa is the e tering 0.00 0.00 0.00 0.00 0.00 0.00	\$134 operly dispose of igation date and the liance. acility No. 1. The estimated date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$134 accumulation in estimated date investigation to costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and prest of comp MP at Fa is the e tering 0.00 0.00 0.00 0.00	\$134 roperly dispose of igation date and tl liance. acility No. 1. The estimated date of of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$134 accumulation in estimated date investigation a costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	\$2,500 Estimated Rer the receiving Estimated cc	nediation/Disposa stream. The Dat ost to develop and date an	al cost to remove e Required is the d i implement a Si d the Final Date	1.07 and pr invest f comp MP at Fa is the e tering 0.00 0.00 0.00 0.00 0.00 0.00	\$134 operly dispose of igation date and the liance. acility No. 1. The estimated date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a plastics and sludge he Final Date is the Date Required is the compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$134 accumulation in estimated date investigation to costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Case ID No.							
eg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
						5.0	15
The second stress		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l						
Delayed Costs							
Equipment	\$150	6-Jul-2017	14-Feb-2019	1.61	\$1	\$16	\$17
Buildings	<u> </u>	0 501 2017	14100 2019	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
Records				0.00	\$0	n/a	\$0
Training/Sampling	\$250	30-Jan-2019	25-Feb-2020	1.07	\$13	n/a	\$13
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	chlorine. T	he Date Required	is the initial inv	1.07 Fer solu estigati	\$1 tions, sodium arse on date and the Fi	n/a nite, and secondary nal Date is the com	\$1 standards for pliance date.
	Estimated Eq chlorine. Tl Estimated T conduct	uipment cost to p he Date Required raining/Sampling the manganese c investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ	1.07 Fer solu estigati ent prod culate to al Date	\$1 tions, sodium arse on date and the Fi cedures and condu otal chlorine residu is the estimated d le of sodium arsen	n/a nite, and secondary	\$1 standards for pliance date. g to properly red is the
Other (as needed) Notes for DELAYED costs	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 fer solu estigati ent proc culate to al Date al Date	\$1 tions, sodium arse on date and the Fi cedures and condu otal chlorine residu is the estimated d le of sodium arsen is the estimated d	n/a nite, and secondary nal Date is the com ict employee trainin- ial. The Date Requi ate of compliance. ite. The Date Requ ate of compliance.	\$1 standards for pliance date. g to properly red is the ired is the
Other (as needed)	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 fer solu estigati ent proc culate to al Date al Date	\$1 tions, sodium arse on date and the Fi cedures and condu otal chlorine residu is the estimated d le of sodium arsen is the estimated d	n/a nite, and secondary nal Date is the com not employee trainin nal. The Date Requi ate of compliance. nite. The Date Requ	\$1 standards for pliance date. g to properly red is the ired is the
Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 Fer solu estigati culate tr al Date lirt bott al Date	\$1 tions, sodium arse on date and the Fi cedures and condu otal chlorine residu is the estimated d le of sodium arsen is the estimated d item (except fo	n/a nite, and secondary nal Date is the com lat employee trainin- lal. The Date Requi ate of compliance. lite. The Date Requi ate of compliance.	\$1 standards for pliance date. g to properly red is the ired is the d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 Fer solu estigati culate to al Date al Date tering 0.00	\$1 tions, sodium arse on date and the Fi cedures and condu otal chlorine residu is the estimated d le of sodium arsen is the estimated d item (except for \$0	n/a nite, and secondary nal Date is the com uct employee trainin- ual. The Date Requi ate of compliance. ite. The Date Requ ate of compliance.	\$1 standards for pliance date. g to properly red is the ired is the d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 fer solu estigati al Date al Date di Date tering 0.00 0.00 0.00	\$1 tions, sodium arse on date and the Fi cedures and condu- total chlorine residu is the estimated d is the estimated d item (except for \$0 \$0	n/a nite, and secondary nal Date is the com ict employee trainin- ial. The Date Requi ate of compliance. ite. The Date Requi ate of compliance.	\$1 standards for pliance date. g to properly red is the ired is the d costs) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 Fer solu estigati al Date di Date tering 0.00 0.00 0.00 0.00 0.00	\$1 tions, sodium arse on date and the Fi cedures and condu- otal chlorine residu is the estimated d le of sodium arsen is the estimated d item (except for \$0 \$0 \$0 \$0 \$0	n/a nite, and secondary nal Date is the com- late of the Date Requi ate of compliance. ite. The Date Requi ate of compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$1 standards for pliance date. g to properly red is the ired is the d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 fer solu estigati ant pro- culate to al Date bil Date tering 0.00 0.00 0.00 0.00 0.00	\$1 tions, sodium arse on date and the Fi cedures and condu- otal chlorine residu is the estimated d le of sodium arsen is the estimated d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a nite, and secondary nal Date is the com ict employee trainin- ual. The Date Requi ate of compliance. ite. The Date Requi ate of compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1 standards for pliance date. g to properly red is the ired is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated Eq chlorine. Ti Estimated T conduct Estimate	uipment cost to p he Date Required raining/Sampling the manganese c investigation d ed cost to label the investigation d	ourchase pH buff is the initial inv cost to impleme orrection to calc ate and the Fina e unmarked squ ate and the Fina	1.07 Fer solu estigati al Date di Date tering 0.00 0.00 0.00 0.00 0.00	\$1 tions, sodium arse on date and the Fi cedures and condu- otal chlorine residu is the estimated d le of sodium arsen is the estimated d item (except for \$0 \$0 \$0 \$0 \$0	n/a nite, and secondary nal Date is the com ict employee trainin- ial. The Date Requi ate of compliance. ite. The Date Requi ate of compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$1 standards for pliance date. g to properly red is the ired is the d costs) \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2019-1559-MWD-E	PCW
			North Orange Water & Sewe	r, LLC ("Facility No. 1")	Policy Revision 4 (April 2014)
Dog		Case ID No.	50415 RN102078136		PCW Revision March 26, 2014
Reg.	LIIL. KEI		Water Quality		
	Enf. C		Steven Van Landingham		
	Viola	ation Number	11		
		Rule Cite(s)		5.125(1) and (5), Tex. Water Code § 26.121(a)(1	L <mark>), and</mark>
			TPDES Permit No	o. WQ0011589001, Permit Conditions No. 2.g	
	Violatio	n Description	Failed to prevent an unauth	orized discharge of sewage wastewater into or a	djacent
	VIOIALIO	Description	to any water in the state, as	shown in the attached Unauthorized Discharge	Table A.
			I	D	b
				Base	Penalty \$25,000
>> Env	vironme	ntal, Propei	rty and Human Health	Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual		x	
		Potential		Percent 5.0%	
>>Pro	aramma	tic Matrix			
	,	Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix Notes	Human heal		en exposed to insignificant amounts of pollutant It of the violation.	s as a
	Notes		Tesu		
				Adjustment	\$23,750
					\$1,250
Violatio	on Event	ts			
		Number of \	/iolation Events 2	2 Number of violation da	N/S
		Number of V			ys
			daily		
			weekly monthly		
			quarterly x	Violation Base I	Penalty \$2,500
			semiannual		
			annualsingle event		
				<u></u>	
		Two guarterl	y events are recommended for	or the discharges that occurred on August 9, 201	17 and
			Sept	tember 13, 2018.	
			_	7	
Good F	aith Effo	orts to Com		NOE/NOV to EDPRP/Settlement Offer	eduction \$625
			Extraordinary		
			Ordinary x		
			N/A		
			Notes The Respon	dent achieved compliance by September 13,	
			Notes	2018.	
			1		
				Violation S	ubtotal \$1,875
Econor	nic Bene	fit (EB) for	this violation	Statutory Limit T	est
		Estimate	ed EB Amount	\$110 Violation Final Penalt	y Total \$2,375
			This vio	plation Final Assessed Penalty (adjusted for	limits) \$2,375

	RN102078136 Water Quality 11					Percent Interest	Years of Depreciation
						5.0	1
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	1			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$Ŭ	\$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	\$2,000	9-Aug-2017	13-Sep-2018	1.10	\$110	n/a	\$110
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
						ges, and to clean ar	
Notes for DELAYED costs	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	ed disc Final D	harge). The Date ate is the complian	Required is the data ace date of the last of	e the initial discharge.
Avoided Costs	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	ed disc Final Da	harge). The Date ate is the complian item (except for	Required is the date ace date of the last	e the initial discharge. d costs)
Avoided Costs Disposal	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	Final Dates of the second seco	harge). The Date ate is the complian item (except for \$0	Required is the data the date of the last of cone-time avoide \$0	e the initial discharge. d costs) \$0
Avoided Costs Disposal Personnel	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	tering	harge). The Date ate is the compliar item (except for \$0 \$0	Required is the data to be a set of the last of one-time avoide \$0 \$0	e the initial discharge. d costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	ed disc Final D tering 0.00 0.00 0.00	harge). The Date ate is the complian item (except for \$0 \$0 \$0	Required is the data to be date of the last of the las	e the initial discharge. d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	tering 0.00 0.00 0.00 0.00	harge). The Date ate is the complian item (except for \$0 \$0 \$0 \$0	Required is the data the date of the last of cone-time avoider \$0 \$0 \$0 \$0 \$0	e the initial discharge. \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	tering 0.00 0.00 0.00 0.00 0.00 0.00	harge). The Date ate is the complian item (except for \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e the initial discharge. \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	harge). The Date ate is the complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e the initial discharge. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	tering 0.00 0.00 0.00 0.00 0.00 0.00	harge). The Date ate is the complian item (except for \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e the initial discharge. \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	affected a unautho	reas (\$1,000 for rized discharge of	each unauthoriz ccurred and the	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	harge). The Date ate is the complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e the initial discharge. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	North Orange Water & Sewer, LLC Docket No. 2019-1559-MWD-E TPDES Permit No. WQ0011589001								
Unauthorized Discharge Table A									
Date	Amount Discharged (gallons)	Description	Corrective Action						
August 9, 2017	Unknown	Sewage overflow from a cleanout at 8505 Shakespeare into a yard.	The main line was cleaned and cleared of any debris. The area was cleaned and disinfected.						
September 13, 2018	500	Broken line at Tennyson Lift Station.	The line was replaced. The area was cleaned and disinfected.						

	Policy Revision 4 (Aj		enalty Calc	ulatior	n Worksh	eet (PC	•	Revision March 26, 2014
DATES	PCW	22-Jun-2020	Screening 16-N	May-2019	EPA Due			
RESPONDENT/FACILITY INFORMATION Respondent North Orange Water & Sewer, LLC ("Facility No. 2") Reg. Ent. Ref. No. RN102078896 Facility/Site Region 10-Beaumont Major/Minor Source Minor								
CASE I	NFORMATION of./Case ID No.)-F			of Violations Order Type	12	
	lia Program(s) Multi-Media	Water Quality	\$0 Maxi	mum	Government Enf. \$25,000	/Non-Profit Coordinator		
Penalty Calculation Section								
TOTAL BASE PENALTY (Sum of violation base penalties) Subtotal 1 \$23,375 ADJUSTMENTS (+/-) TO SUBTOTAL 1 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. Subtotal 2								
	Compliance Hi		for three Orders of Order without				tals 2, 3, & 7	\$19,868
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	Notes The Respondent does not meet the culpability criteria.						
	Good Faith Effort to Comply Total Adjustments Subtot							-\$2,092
	Economic Ben Estimated	efit Total EB Amounts Cost of Compliance	\$6,932 \$61,175		Enhancement* at the Total EB \$ Ar	nount	Subtotal 6	\$0
SUM OF SUBTOTALS 1-7 Final							inal Subtotal	\$41,151
		Subtotal by the indic	IAY REQUIRE cated percentage.		0.0%		Adjustment	\$0
	Hotes					Final Per	alty Amount	\$41,151
STATUTORY LIMIT ADJUSTMENT Final Assessed Pena								\$41,151
DEFE Reduces		nalty by the indicated	l percentage.		0.0%	Reduction	Adjustment	\$0
Notes No deferral is recommended for Findings Orders.								
PAYA	BLE PENALT	1						\$41,151

		without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%	
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%	
	and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
	Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%	
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%	
			NL	00/	
		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%	
		Participation in a voluntary pollution reduction program	No	0%	
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
		Adjustment Per	centage (Sub	total 2)	85%
>> Re	peat Violator	(Subtotal 3)			
	No	Adjustment Per	centage (Sub	total 3)	0%
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)			
	Satisfactory	Performer Adjustment Per	centage (Sub	total 7)	0%
>> Co	mpliance Hist	ory Summary			
	Compliance History Notes	Enhancement for three Orders containing a denial of liability and one Order with liability.	out a denial of		
>> Fina	al Compliance	Total Compliance History Adjustment Percentage (S History Adjustment	Subtotals 2,	3, & 7) [85%
		Final Adjustment Percent	age *capped a	at 100%	85%

Compliance History Worksheet Compliance History Site Enhancement (Subtotal 2)

Written notices of violation ("NOVs") with same or similar violations as those in

Any agreed final enforcement orders containing a denial of liability (number of

Any adjudicated final enforcement orders, agreed final enforcement orders

Docket No. 2019-1559-MWD-E

Screening Date 16-May-2019 **Respondent** North Orange Water & Sewer, LLC ("Facility No. 2")

the current enforcement action (number of NOVs meeting criteria)

Case ID No. 50415

Number of...

Other written NOVs

orders meeting criteria)

>>

Component

NOVs

Orders

Reg. Ent. Reference No. RN102078896

Media Water Quality

Enf. Coordinator Steven Van Landingham

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

Adjust.

0%

0%

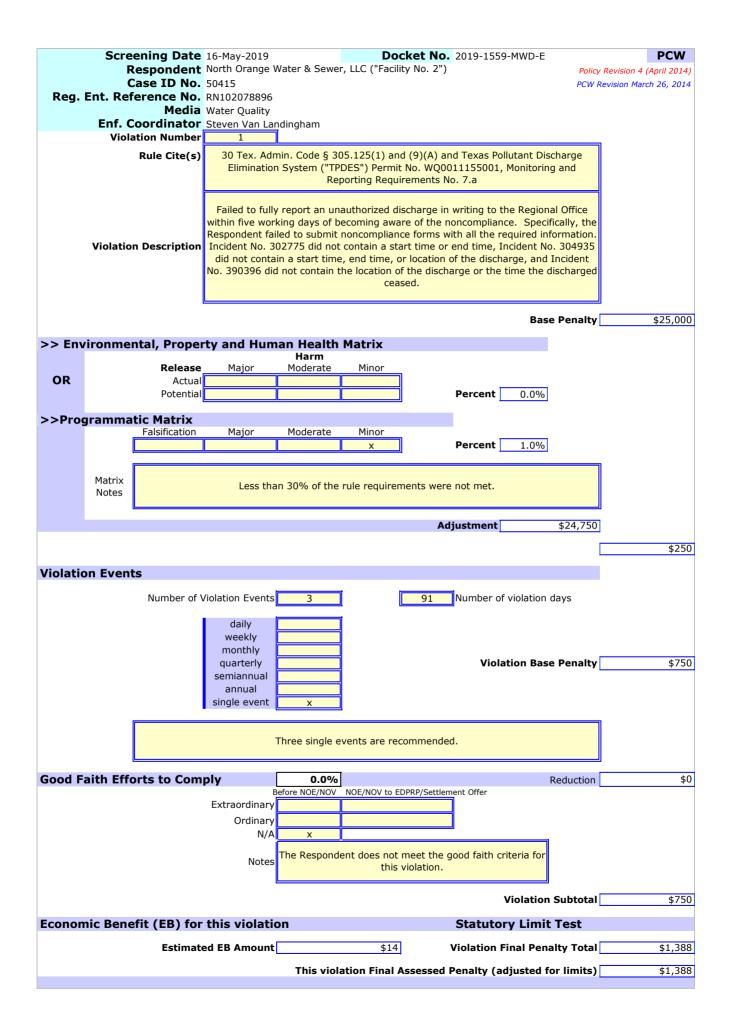
60%

Number

0

0

3



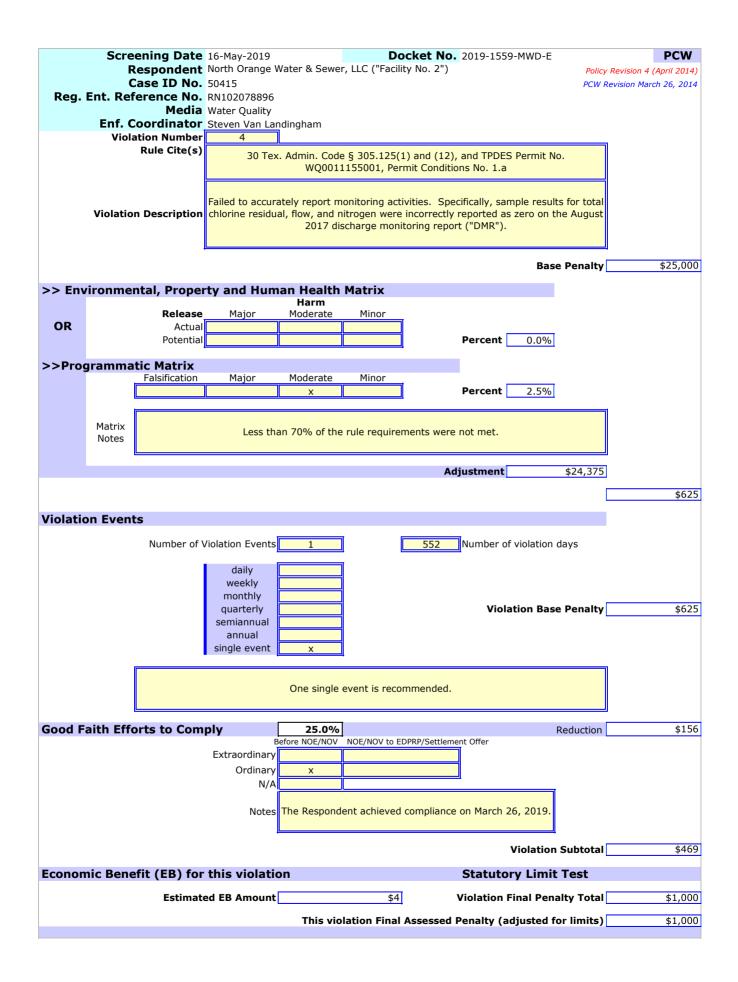
	E	conomic	Benefit	Wo	rksheet		
Respondent		Water & Sewer, L					
Case ID No.	-)			
Reg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
violation No.	1					F a	
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l						
-							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction		ii		0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$250	14-Feb-2019	2-Apr-2020	1.13	\$14	n/a	\$14
Remediation/Disposal	<u> </u>		<u>2 Api 2020</u>	0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Natao fee DELAVED			a cubmittad ca		The Date Required		g to ensure
Notes for DELAYED costs	noncomplian			•	ted date of complia	d is the investigatior ance.	
Notes for DELAYED costs		F	inal Date is the	estimat	ted date of complia		date and the
		F	inal Date is the	estimat	ted date of complia	ance.	date and the
Avoided Costs		F	inal Date is the	estimat	ted date of complia	nce. one-time avoide	date and the
Avoided Costs Disposal Personnel		F	inal Date is the	estimat	ted date of complia item (except for \$0	nce. one-time avoider \$0 \$0 \$0	date and the d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel		F	inal Date is the	estimat 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0	nce. r one-time avoider \$0 \$0 \$0 \$0	date and the d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		F	inal Date is the	estimat 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0	nce. one-time avoider \$0 \$0 \$0	date and the d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment		F	inal Date is the	estimat 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0	nce. r one-time avoider \$0 \$0 \$0 \$0	date and the d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		F	inal Date is the	estimat 0.00 0.00 0.00 0.00 0.00	ted date of complia item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	nce. • one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d date and the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		F	inal Date is the	estimat 0.00 0.00 0.00 0.00 0.00 0.00	ted date of complia item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	nce. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date and the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			0. 2019-1559-MWD-E	PCW
		lespondent Case ID No.	North Orange Water & Sev	wer, LLC ("Facility No. 2")		Policy Revision 4 (April 2014)
Reg.			RN102078896			PCW Revision March 26, 2014
		Media	Water Quality			
			Steven Van Landingham			
	Viola	ation Number Rule Cite(s)	2			
		Rule Cite(S)		30 Tex. Admin. Code § 3	17.3(a)	
	Violatio	n Description		stations in an intruder-res a vertical gap in the fence fence.		
					Base	e Penalty \$25,000
>> En	vironme	ntal, Propei	r <mark>ty and Human Heal</mark> t Harm	th Matrix		
		Release	Major Moderate	e Minor		
OR		Actual				
		Potential	X		Percent 5.0%	
>>Pro	gramma	tic Matrix				
		Falsification	Major Moderate	e Minor		
					Percent 0.0%	
		Human health	or the environment will or	could be exposed to sign	ificant amounts of pollu	tants that
	Matrix Notes		eed levels that are protecti			
	Notes			of the violation.		
				Δ	Adjustment	\$23,750
						\$1,250
Violati	ion Event	ts				
		Number of \	Violation Events 1	91	Number of violation	davs
			daily			
			weekly monthly	_		
			quarterly		Violation Base	e Penalty \$1,250
			semiannual			
			annual single event x	_		
		I	single event <u>x</u>			
			One sing	le event is recommended	l.	
				<u> </u>		
Good I	Faith Effo	orts to Com	Before NOE/NO			Reduction \$0
			Extraordinary	JV NOE/NOV to EDPRP/Settle		
			Ordinary			
			N/A x			
			The Respo	ondent does not meet the	good faith criteria for	
			Notes	this violation.		
			<u> </u>		Violation	Subtotal \$1,250
Econor	mic Porc	fit (EB) for	this violation		Statutory Limit	
LCOHO						
		Estimate	ed EB Amount	\$141	Violation Final Pena	alty Total \$2,313
			This	violation Final Assessed	d Penalty (adjusted f	or limits) \$2,313

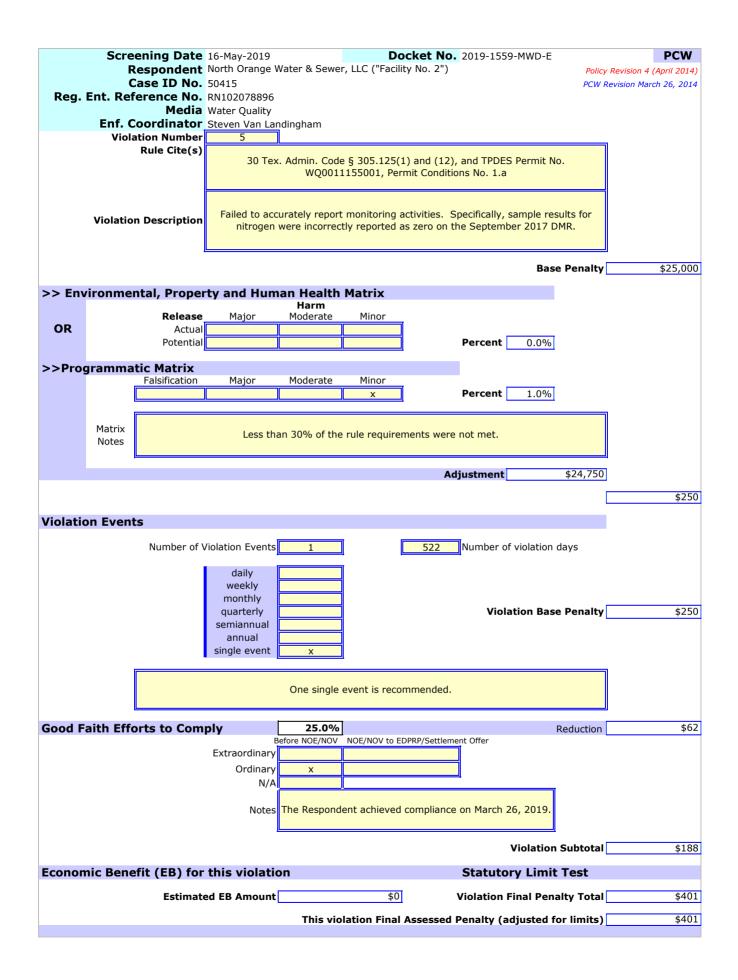
				-			
		Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.							
Reg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of
Violation No.	2						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs	. <u> </u>				+0	+ 0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u> \$0
Other (as needed) Engineering/Construction				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$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 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$2,500	14-Feb-2019	2-Apr-2020	1.13	\$141		
					•	n/a e gap at the base of	\$141 the fence to
Notes for DELAYED costs	Estimated of	cost to make repai	irs to the vertication. The Date Re	al gap in quired	n the fence and the		the fence to
	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ed date	n the fence and the is the investigatior of compliance.	e gap at the base of a date and the Final	the fence to Date is the
Notes for DELAYED costs	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ed date	n the fence and the is the investigatior of compliance.	e gap at the base of	the fence to Date is the
Notes for DELAYED costs	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in quired ed date tering 0.00 0.00	the fence and the is the investigation of compliance. item (except for \$0 \$0	e gap at the base of date and the Final r one-time avoide \$0 \$0	the fence to Date is the d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ed date tering 0.00 0.00 0.00	the fence and the is the investigation of compliance. item (except for \$0 \$0 \$0	e gap at the base of date and the Final r one-time avoide \$0 \$0 \$0	the fence to Date is the d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ed date 0.00 0.00 0.00 0.00	the fence and the is the investigation of compliance. item (except for \$0 \$0	e gap at the base of date and the Final r one-time avoide \$0 \$0 \$0 \$0	the fence to Date is the \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ad date 0.00 0.00 0.00 0.00 0.00 0.00	the fence and the is the investigation of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e gap at the base of date and the Final r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	Fithe fence to Date is the Date is the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ed date itering 0.00 0.00 0.00 0.00 0.00 0.00	the fence and the is the investigation of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e gap at the base of a date and the Final r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the fence to Date is the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ad date 0.00 0.00 0.00 0.00 0.00 0.00	the fence and the is the investigation of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e gap at the base of date and the Final r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	the fence to Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated of secure the	cost to make repai e influent lift statio	irs to the vertica on. The Date Re estimate	al gap in equired ed date itering 0.00 0.00 0.00 0.00 0.00 0.00	the fence and the is the investigation of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e gap at the base of a date and the Final r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the fence to Date is the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date		Docket No. 2019-1559-MWD-E	PCW
Respondent Case ID No.	North Orange Water & Sewe	er, LLC ("Facility No. 2")	Policy Revision 4 (April 2014) PCW Revision March 26, 2014
Reg. Ent. Reference No.			PCW REVISION March 26, 2014
	Water Quality		
Enf. Coordinator Violation Number	Steven Van Landingham		
	3		155001
Rule Cite(s)		.125(1) and (5) and TPDES Permit No. WQ0011 perational Requirements No. 1	155001,
Violation Description	disposal are properly oper chamber contained one for	o. 2 and all of its systems of collection, treatmer ated and maintained. Specifically, the chlorine of ot of sludge in a total water depth of three feet, a ad rising sludge and excessive surface scum.	contact
		Base	Penalty \$25,000
>> Environmental, Proper		n Matrix	
Release	Harm Major Moderate	Minor	
OR Actual			
Potential	Х	Percent 5.0%	
>>Programmatic Matrix			
Falsification	Major Moderate	Minor Deveent 0.00%	
		Percent 0.0%	
Matrix	eed levels that are protective	ould be exposed to significant amounts of polluta e of human health or environmental receptors as of the violation.	
		Adjustment	\$23,750
		Aujustinent	
			\$1,250
Violation Events			
Number of V	/iolation Events	91 Number of violation da	ays
	dailyweeklymonthlyquarterlyxsemiannualannualsingle event	Violation Base	Penalty \$7,500
	v events for each clarifier) fro	to quarterly events for the chlorine contact char om the February 14, 2019 investigation date to t 019 screening date.	
Good Faith Efforts to Com	ply 0.0%	R	eduction \$0
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary Ordinary		
	N/A x	<u>, </u>	
	Notes The Respon	dent does not meet the good faith criteria for this violation.	
		Violation S	Subtotal \$7,500
Economic Benefit (EB) for			
	this violation	Statutory Limit	Test
	this violation ed EB Amount	Statutory Limit ⁻ \$141 Violation Final Penal	

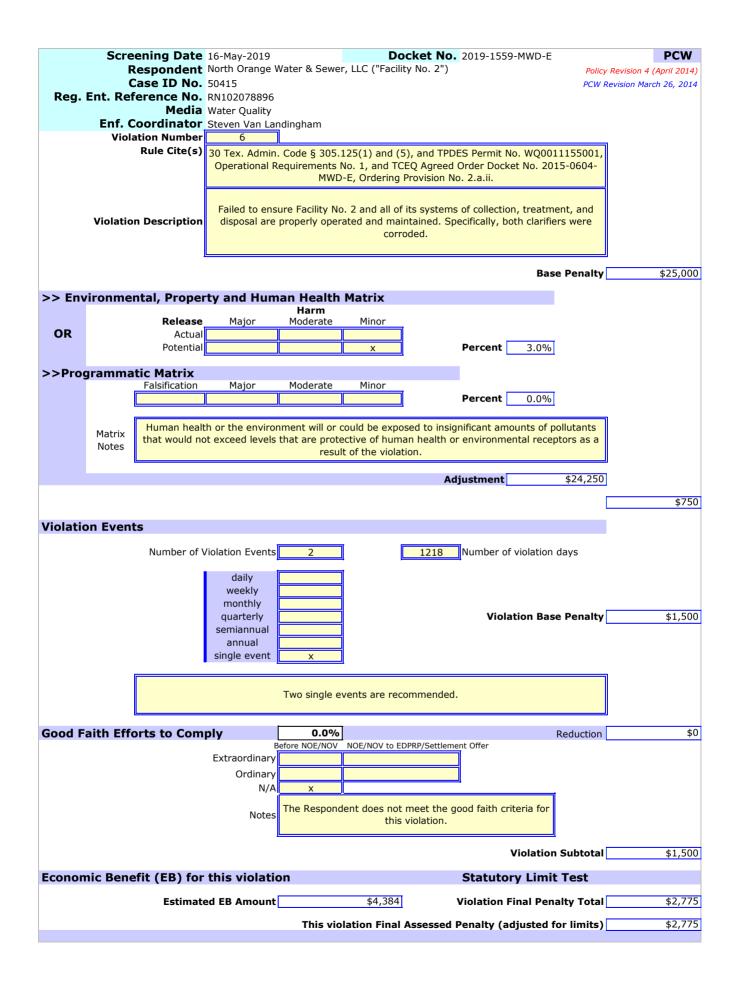
Deeneralent		conomic		-			
		Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.							
leg. Ent. Reference No.	RN102078896						
Media	Water Quality					Percent Interest	Years of
Violation No.	3					Percent Interest	Depreciation
						5.0	15
	Thom Cost	Data Dequired	Final Date	Vere	Interest Saved	Costs Saved	EB Amount
		Date Required	Final Date	TIS	Interest Saved	Costs Saved	EB Amount
Item Description	1						
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	+2 500		2 4 2020	0.00	\$0	n/a	\$0
Remediation/Disposal	\$2,500	14-Feb-2019	2-Apr-2020	1.13	\$141 \$0	n/a n/a	<u>\$141</u> \$0
Permit Costs					\$0		
O UL (
Other (as needed)				0.00	\$0	n/a	\$0 \$0
Other (as needed)	Estimated Re	emediation/Dispos	sal cost to remo	0.00	\$0		\$0
Other (as needed) Notes for DELAYED costs				0.00 ve and	\$0 properly dispose o	n/a f sludge from the ch	\$0 Norine contact
. ,	chamber an	d to remove and	properly dispose	0.00 ve and of sluc	\$0 properly dispose o lge and surface sc	n/a f sludge from the ch um from both clarifi	\$0 Norine contact ers. The Date
Notes for DELAYED costs	chamber an Requ	d to remove and price of the investion o	properly dispose gation date and	0.00 ve and e of sluc the Fin	\$0 properly dispose o lge and surface sc al Date is the esti	n/a f sludge from the ch um from both clarifi mated date of comp	\$0 Norine contact ers. The Date liance.
. ,	chamber an Requ	d to remove and price of the investion o	properly dispose gation date and	0.00 ve and of sluc the Fin	\$0 properly dispose o lge and surface sc al Date is the esti	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide	\$0 Ilorine contact ers. The Date liance. d costs)
Notes for DELAYED costs	chamber an Requ	d to remove and price of the investion o	properly dispose gation date and	0.00 ve and e of sluc the Fin tering 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0	\$0 nlorine contact ers. The Date liance. d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	chamber an Requ	d to remove and price of the investion o	properly dispose gation date and	ve and e of sluc the Fin tering 0.00	\$0 properly dispose o lge and surface sc al Date is the estii item (except for \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0	\$0 nlorine contact ers. The Date liance. d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	chamber an Requ	d to remove and price of the investion o	properly dispose gation date and	0.00 ve and of sluc the Fin tering 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except fo \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0	\$0 Norine contact ers. The Date liance. d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluc the Fin tering 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 Norine contact ers. The Date liance. 4 costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluc the Fin 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose of lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 Norine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluce the Fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 lorine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluc the Fin 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose of lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 Norine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluce the Fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 Norine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluce the Fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 hlorine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluce the Fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 Norine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluce the Fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 Norine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluce the Fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 norine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	chamber an Requ	d to remove and price investion is the investion of the i	properly dispose gation date and	0.00 ve and e of sluce the Fin 0.00 0.00 0.00 0.00 0.00 0.00	\$0 properly dispose o lge and surface sc al Date is the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a f sludge from the ch um from both clarifi mated date of comp r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 norine contact ers. The Date liance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



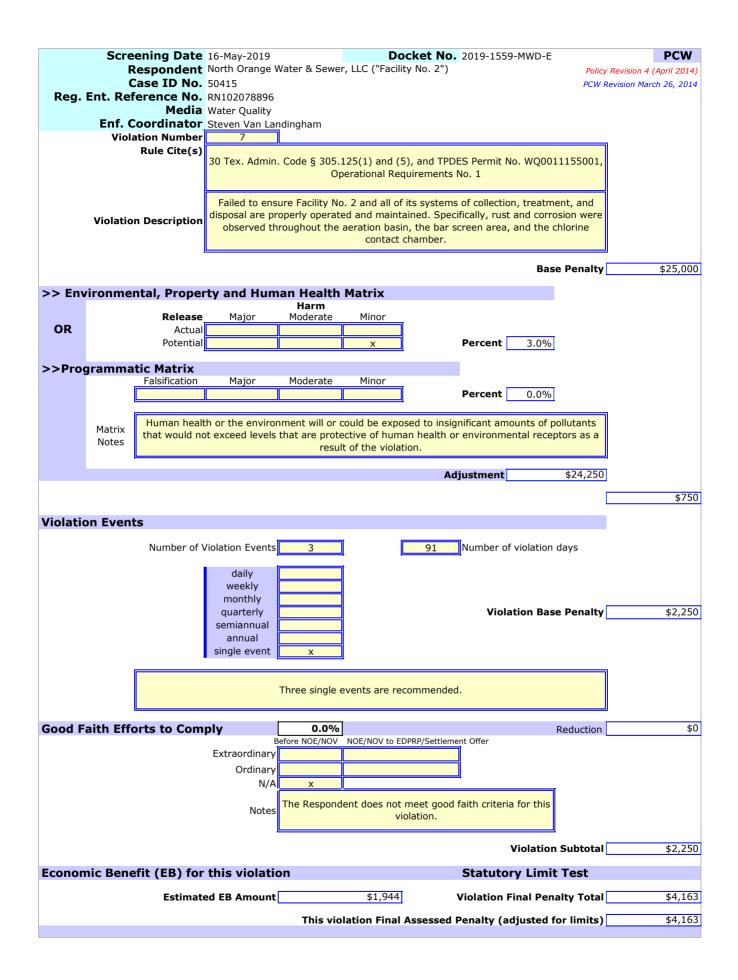
Deenendent			Benefit	-	rksheet		
Kespondent	North Orange	Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.				-			
leg. Ent. Reference No.							
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
Violation No.	4						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Ceste							
Delayed Costs	r	1		0.00	¢0	¢0	¢0
Equipment				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed) 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	<u>\$0</u> \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$50 Estimate	20-Sep-2017	26-Mar-2019 updated DMRs t	1.51	\$4	n/a e results for August	\$4
Other (as needed) Notes for DELAYED costs	Estimate	ed cost to submit u	updated DMRs t R). The Date Re	1.51 o reflec	\$4 t the actual sampl	n/a e results for August nple results were in	\$4 2017 and
	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 to reflect equired te is the	\$4 t the actual sampl is the date the sar e compliance date.	n/a e results for August nple results were in	\$4 2017 and itially due and
Notes for DELAYED costs	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 to reflect equired te is the	\$4 t the actual sampl is the date the sar e compliance date.	n/a e results for August nple results were in	\$4 2017 and itially due and
Notes for DELAYED costs	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 o reflect equired te is the tering	\$4 t the actual sampl is the date the sar e compliance date. item (except for \$0 \$0	n/a e results for August nple results were in r one-time avoide \$0 \$0	\$4 2017 and itially due and d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 o reflect equired te is the tering 0.00	\$4 t the actual samplis the date the samplis the date the samplis compliance date. item (except for \$0 \$0 \$0	n/a e results for August nple results were in r one-time avoide \$0 \$0 \$0	\$4 2017 and itially due and d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 o reflece equired te is the tering 0.00 0.00 0.00 0.00	\$4 t the actual sampl is the date the sar e compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a e results for August nple results were in r one-time avoide \$0 \$0 \$0 \$0 \$0	\$4 2017 and itially due and d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 o reflece quired te is the 0.00 0.00 0.00 0.00 0.00	\$4 t the actual sampl is the date the sar e compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e results for August nple results were in r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4 2017 and itially due and d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 o reflece equired te is the 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$4 t the actual sampl is the date the sar e compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e results for August nple results were in r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4 2017 and itially due and 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 o reflece quired te is the 0.00 0.00 0.00 0.00 0.00	\$4 t the actual sampl is the date the sar e compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e results for August nple results were in r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4 2017 and itially due and d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimate September 2	d cost to submit (2017 (\$25 per DM	updated DMRs t R). The Date Re the Final Da	1.51 o reflece equired te is the 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$4 t the actual sampl is the date the sar e compliance date. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e results for August nple results were in r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4 2017 and itially due and 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



		conomic	Benefit	Wo	rksheet		
Respondent	North Orange	Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.	-		20 (1 0 0 1 1 0	/			
Reg. Ent. Reference No.		1					
	Water Quality					Percent Interest	Years of
Violation No.	5						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Thom Decemination		Bute Required	That Date		Interest sureu		20 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				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0 \$0	n/a n/a	\$0
Other (as needed)							
		<u>- I</u>			·		\$0
Notes for DELAYED costs				fit inclue	ded in Violation No	. 4.	
Avoided Costs	ANNU			fit inclue	ded in Violation No	. 4. r one-time avoide	d costs)
Avoided Costs Disposal	ANNU			fit inclue	ded in Violation No item (except for \$0	r one-time avoide \$0	d costs) \$0
Avoided Costs Disposal Personnel	ANNU/			fit inclue tering 0.00 0.00	item (except for \$0	• 4. r one-time avoide \$0 \$0	d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	ANNU			fit inclue tering 0.00 0.00 0.00	item (except for \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	ANNU/			fit inclue tering 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0	• 4. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU,			fit inclue itering 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	. 4. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	ANNU/			fit inclue tering 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU/			fit inclue itering 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	. 4. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				fit inclue tering 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



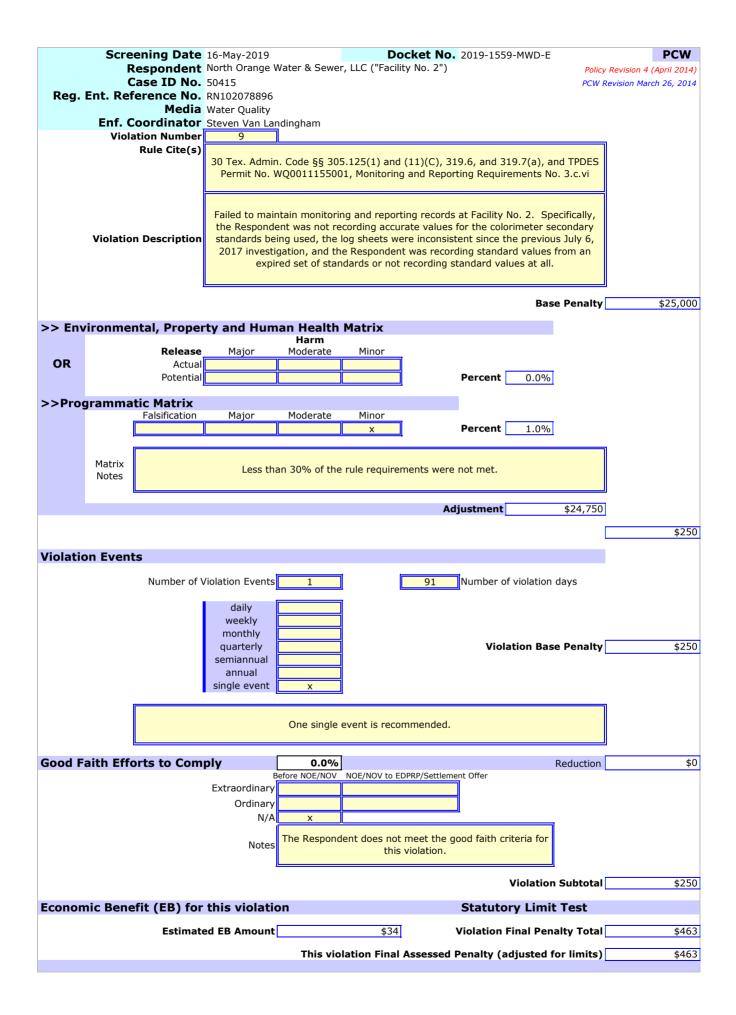
eg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	r	1		0.00	+0	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	<u>\$0</u> \$0	<u>\$0</u> \$0	\$0
Other (as needed) Engineering/Construction				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Engineering/Construction		1		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						Π/α	
				0 00	\$0	n/a	¢0
Other (as needed)						n/a n/a rs (\$10,000 per uni	
Other (as needed) Notes for DELAYED costs	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr er Docke ed date	\$4,384 ing at both clarifie et No. 2015-0604- of compliance.	n/a rs (\$10,000 per uni MWD-E and the Fina	\$4,384 t). The Date al Date is the
Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 n occurr er Docke ed date	\$4,384 ing at both clarifie at No. 2015-0604- of compliance. item (except for	n/a rs (\$10,000 per uni MWD-E and the Fina one-time avoide	\$4,384 t). The Date al Date is the d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr occurr d date tering 0.00	\$4,384 ing at both clarifie et No. 2015-0604- of compliance. item (except for \$0	n/a rs (\$10,000 per uni MWD-E and the Fina r one-time avoide \$0	\$4,384 t). The Date al Date is the d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr er Docke ed date tering 0.00 0.00	\$4,384 ing at both clarifie at No. 2015-0604- of compliance. item (except for \$0 \$0	n/a rs (\$10,000 per unit MWD-E and the Fina r one-time avoide \$0 \$0	\$4,384 t). The Date al Date is the d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr er Docke ed date tering 0.00 0.00	\$4,384 ing at both clarifie at No. 2015-0604- of compliance. item (except for \$0 \$0 \$0 \$0	n/a rs (\$10,000 per unit MWD-E and the Find r one-time avoide \$0 \$0 \$0	\$4,384 t). The Date al Date is the d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr occurr d date 0.00 0.00 0.00 0.00	\$4,384 ing at both clarifie at No. 2015-0604- of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a rs (\$10,000 per unit MWD-E and the Fina one-time avoide \$0 \$0 \$0 \$0 \$0	\$4,384 t). The Date al Date is the d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr er Docke d date 0.00 0.00 0.00 0.00 0.00	\$4,384 ing at both clarifie at No. 2015-0604- of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a rs (\$10,000 per unit MWD-E and the Find * one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4,384 t). The Date al Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr er Docks d date 0.00 0.00 0.00 0.00 0.00 0.00	\$4,384 ing at both clarifie et No. 2015-0604- of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a rs (\$10,000 per uni MWD-E and the Fin one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4,384 t). The Date al Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated Required is	cost to remove th the effective date	e rust/corrosion of Agreed Orde estimate	4.38 occurr er Docke d date 0.00 0.00 0.00 0.00 0.00	\$4,384 ing at both clarifie at No. 2015-0604- of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a rs (\$10,000 per unit MWD-E and the Find * one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4,384 t). The Date al Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



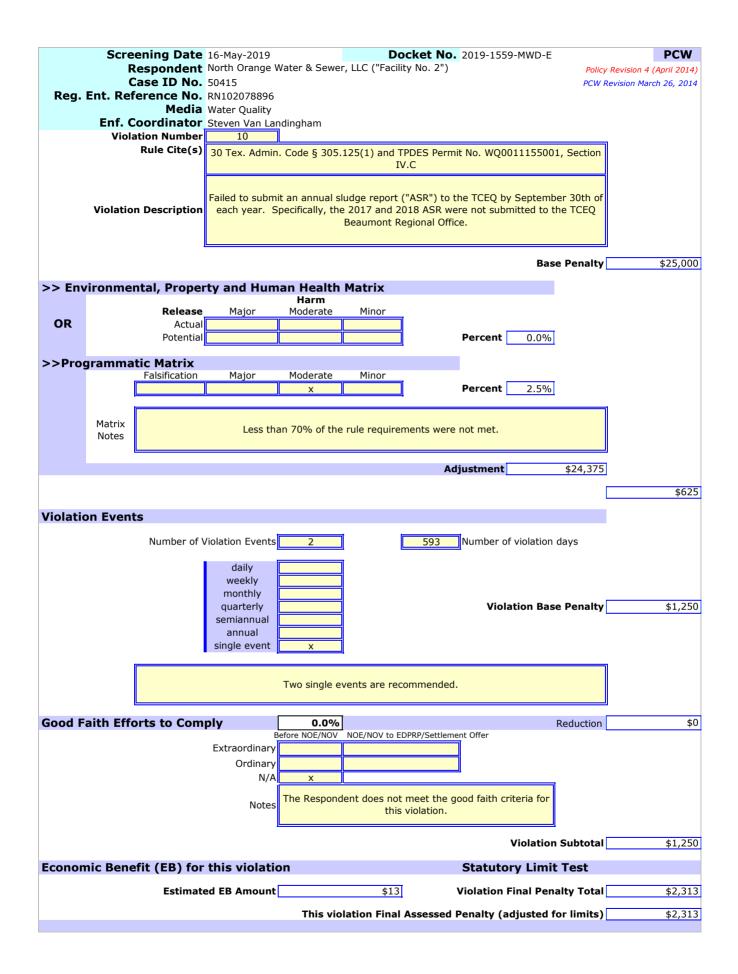
		conomic		-	rksneet		
Respondent	North Orange	Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.	50415						
Reg. Ent. Reference No.	RN102078896						
-	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
	. /						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$30,000	14-Feb-2019	1-Jun-2020	1.30	\$1,944	n/a	\$0 \$1,944
Other (as needed)	+			1.30	\$1,944	n/a	\$1,944
	Estimated co	st to remove the r	rust/corrosion o	1.30 ccurring	\$1,944 g at the bar screer	n/a area, the aeration	\$1,944 basin, and the
Other (as needed) Notes for DELAYED costs	Estimated co	st to remove the r	rust/corrosion o 0,000 per unit)	1.30 ccurring . The D	\$1,944 g at the bar screer ate Required is the	n/a area, the aeration investigation date	\$1,944 basin, and the
	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring . The D timated	\$1,944 g at the bar screer ate Required is the date of compliance	n/a n area, the aeration e investigation date re.	\$1,944 basin, and the and the Final
	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring . The D timated	\$1,944 g at the bar screer ate Required is the date of compliance	n/a area, the aeration investigation date	\$1,944 basin, and the and the Final
Notes for DELAYED costs	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring The D timated tering 0.00	\$1,944 g at the bar screer ate Required is the date of complianc item (except for \$0	n/a n area, the aeration e investigation date re. r one-time avoide \$0	\$1,944 basin, and the and the Final d costs) \$0
Notes for DELAYED costs Avoided Costs	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring The D timated tering 0.00 0.00	\$1,944 g at the bar screer ate Required is the date of compliance item (except for \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated tering 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of complianc item (except for \$0 \$0 \$0	n/a area, the aeration a investigation date r one-time avoide \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel (nspection/Reporting/Sampling Supplies/Equipment	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated tering 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date re. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00	\$1,944 g at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration investigation date rone-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00	\$1,944 g at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration investigation date rone-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated co chlorine cor	st to remove the r ntact chamber (\$1	rust/corrosion o 0,000 per unit) Date is the es	1.30 ccurring timated 0.00 0.00 0.00 0.00 0.00 0.00	\$1,944 at the bar screer ate Required is the date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a area, the aeration e investigation date e. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,944 basin, and the and the Final d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	e 16-May-2019 t North Orange V	Nator & Sowo		ket No. 2019-1559-MWD-E	PCW
Case ID No		valei & Sewei		10.2)	Policy Revision 4 (April 2014) PCW Revision March 26, 2014
Reg. Ent. Reference No					
	Water Quality				
Enf. Coordinato		ndingham			
Violation Numbe					
Rule Cite(s) 30 Tex	. Admin. Code	e § 305.125(1)	and (17), and TPDES Permit No.	
				Reporting Requirements No. 1	
				s at intervals specified in the per	
Violation Description	a Specifically, th	e DMR for Esc	cherichia coli ("E	. coli") for the monitoring period by the 20th day of the following	ending
	on December	51, 2017 Wd3	not submitted	by the 20th day of the following	
				Base	Penalty \$25,000
>> Environmental, Prope	erty and Hum	Harm	Matrix		
Release		Moderate	Minor		
OR Actua				B	
Potentia			<u> </u>]	Percent 0.0%	
>>Programmatic Matrix					
Falsification	Major	Moderate	Minor	-	
			X	Percent 1.0%	
Matrix Notes	Less the	an 30% of the	e rule requireme	nts were not met.	
Notes					
				Adjustment	\$24,750
					\$250
Violation Events					
Number of	Violation Events	1	i 📻	453 Number of violation da	N/S
		<u>+</u>			,
	daily				
	weekly				
	monthly quarterly			Violation Base	Penalty \$250
	semiannual				φ_200
	annual				
	single event	х			
		One cingle	event is recomr	nended.	
		One single			
Good Faith Efforts to Con		0.0%			eduction \$0
Good Faith Efforts to Con	E			Re Re/Settlement Offer	duction \$0
Good Faith Efforts to Con	Extraordinary	0.0%			duction \$0
Good Faith Efforts to Con	Extraordinary Ordinary	0.0% Before NOE/NOV			duction \$0
Good Faith Efforts to Con	Extraordinary	0.0% Before NOE/NOV	NOE/NOV to EDP	RP/Settlement Offer	duction \$0
Good Faith Efforts to Con	Extraordinary Ordinary	0.0% Before NOE/NOV	NOE/NOV to EDP	RP/Settlement Offer	eduction \$0
Good Faith Efforts to Con	e Extraordinary Ordinary N/A	0.0% Before NOE/NOV	NOE/NOV to EDP	RP/Settlement Offer	eduction \$0
Good Faith Efforts to Con	e Extraordinary Ordinary N/A	0.0% Before NOE/NOV	NOE/NOV to EDP	RP/Settlement Offer	
	Extraordinary Ordinary N/A Notes	0.0% Before NOE/NOV	NOE/NOV to EDP	eet the good faith criteria for plation. Violation S	ubtotal \$250
Economic Benefit (EB) fo	Extraordinary Ordinary N/A Notes r this violatio	0.0% Before NOE/NOV x The Respond	NOE/NOV to EDPI	eet the good faith criteria for plation. Violation S Statutory Limit 1	ubtotal \$250
Economic Benefit (EB) fo	Extraordinary Ordinary N/A Notes	0.0% Before NOE/NOV x The Respond	NOE/NOV to EDP	eet the good faith criteria for plation. Violation S	ubtotal \$250

	E	conomic	Benefit	Wo	rksheet		
Respondent	North Orange	Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.	-	···· · · · · ,	- (, -	,			
leg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of Depreciation
						5.0	. 1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delawed Cente							
Delayed Costs		n in			*0	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0 ¢0	\$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
Records				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)	+25	20.1 2010	10.4 2010	0.00	\$0	n/a	\$0
	\$25	20-Jan-2018	18-Apr-2019	1.24	\$2	n/a	\$2
Notes for DELAYED costs		ost to submit the I	missing DMR for	r E. coli	· +=	he Date Required is	
Notes for DELAYED costs	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	r <i>E. coli</i> al Date	sample results. T is the compliance	he Date Required is date.	the DMR due
Notes for DELAYED costs	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	r <i>E. coli</i> al Date tering	sample results. T is the compliance item (except for	he Date Required is date.	the DMR due
Notes for DELAYED costs	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	r <i>E. coli</i> al Date	sample results. T is the compliance item (except for \$0	he Date Required is date. r one-time avoide \$0	the DMR due d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	r <i>E. coli</i> al Date tering	sample results. T is the compliance item (except for	he Date Required is date.	the DMR due
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	E. coli al Date tering 0.00 0.00	sample results. T is the compliance of item (except for \$0 \$0	he Date Required is date.	the DMR due d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	tering 0.00 0.00 0.00	sample results. T is the compliance of item (except for \$0 \$0 \$0	he Date Required is date.	the DMR due d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	tering 0.00 0.00 0.00 0.00 0.00	sample results. T is the compliance of item (except for \$0 \$0 \$0 \$0 \$0 \$0	he Date Required is date. • one-time avoide \$0 \$0 \$0 \$0 \$0	the DMR due d costs) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	tering 0.00 0.00 0.00 0.00 0.00 0.00	sample results. T is the compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	he Date Required is date.	the DMR due d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated c	ost to submit the i di	missing DMR for ate and the Fina	tering 0.00 0.00 0.00 0.00 0.00 0.00	sample results. T is the compliance of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	he Date Required is date.	the DMR due \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Reg. Ent. Reference No.	RN102078896 Water Quality						Years of
Violation No.						Percent Interest	Depreciation
						5.0	1!
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$250	6-Jul-2017	2-Apr-2020	2.74	\$34	n/a	\$34
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)							
						n/a employee training orded to include sta	
Notes for DELAYED costs	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e	dures and conduct are accurately rec ed. The Date Requ estimated date of o	n/a c employee training orded to include sta ired is the previous compliance.	to ensure that indard values, investigation
Notes for DELAYED costs	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e	dures and conduct are accurately rec ed. The Date Requ estimated date of o item (except for	n/a cemployee training orded to include sta ired is the previous compliance. one-time avoide	to ensure that indard values, investigation d costs)
Notes for DELAYED costs Avoided Costs Disposal	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e tering 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of o item (except for \$0	n/a cemployee training orded to include sta ired is the previous compliance. compliance. some-time avoide \$0	to ensure that indard values, investigation d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	t proce checks unexpire is the e tering 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of c item (except for \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. one-time avoide \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	t proce checks unexpire is the e tering 0.00 0.00 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of c item (except for \$0 \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. one-time avoide \$0 \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	t proce checks unexpire is the of tering 0.00 0.00 0.00 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of c item (except for \$0 \$0 \$0 \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. one-time avoide \$0 \$0 \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e tering 0.00 0.00 0.00 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of c item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e 0.00 0.00 0.00 0.00 0.00 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of o item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e tering 0.00 0.00 0.00 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of c item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e 0.00 0.00 0.00 0.00 0.00 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of o item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	the colorime and to ensu	ter secondary sta re that secondary date an	ndard accuracy standards are d the Final Date	nt proce checks unexpire is the e 0.00 0.00 0.00 0.00 0.00 0.00	dures and conduct are accurately rec ed. The Date Requ estimated date of o item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a employee training orded to include sta ired is the previous compliance. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that indard values, investigation d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent		Water & Sewer, L					
Case ID No.				/			
Reg. Ent. Reference No.							
							Years of
	Water Quality					Percent Interest	
Violation No.	10						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	•	•					
Item Description	•						
	_						
Delayed Costs	5			1			
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	¢100	20.000 2017	2 4 mm 2020	0.00	\$0	n/a	\$0
Record Keeping System	\$100	30-Sep-2017	2-Apr-2020	2.51	\$13	n/a	\$13
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Permit Costs				0.00	\$0	n/a	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	n/a	
	Estimated Rec	cord Keeping Syste	em to submit th			n/a 7 and 2018 to the T	\$0 CEQ Beaumont
Notes for DELAYED costs			ired is the initia	ne ASRs al date s	for the years 201	· · · · · · · · · · · · · · · · · · ·	CEQ Beaumon
Notes for DELAYED costs	Regional Office	e. The Date Requ	ired is the initia dat	ne ASRs al date s te of co	for the years 201 submittal was due mpliance.	7 and 2018 to the T	CEQ Beaumon s the estimated
	Regional Office	e. The Date Requ	ired is the initia dat	te ASRs date s te of con tering 0.00	for the years 201 submittal was due mpliance. item (except for \$0	7 and 2018 to the T and the Final Date in r one-time avoide \$0	CEQ Beaumont s the estimated d costs) \$0
Avoided Costs	Regional Office	e. The Date Requ	ired is the initia dat	te ASRs al date s te of con tering 0.00 0.00	for the years 201 submittal was due mpliance. item (except for \$0 \$0	7 and 2018 to the T and the Final Date i r one-time avoide \$0 \$0	CEQ Beaumon s the estimated d costs) \$0 \$0
Avoided Costs Disposal Personnel	Regional Office	e. The Date Requ	ired is the initia dat	te ASRs date s te of con tering 0.00	for the years 201 submittal was due mpliance. item (except for \$0 \$0 \$0	7 and 2018 to the T and the Final Date is r one-time avoide \$0 \$0 \$0	CEQ Beaumon s the estimated d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel	Regional Office	e. The Date Requ	ired is the initia dat	te ASRs al date s te of con tering 0.00 0.00	for the years 201 submittal was due mpliance. item (except for \$0 \$0	7 and 2018 to the T and the Final Date is r one-time avoide \$0 \$0 \$0 \$0	CEQ Beaumon' s the estimated d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling	Regional Office	e. The Date Requ	ired is the initia dat	tering	for the years 201 submittal was due mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	7 and 2018 to the T and the Final Date is r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	CEQ Beaumont s the estimated \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Regional Office	e. The Date Requ	ired is the initia dat	te ASRs d date s te of con tering 0.00 0.00 0.00 0.00	for the years 201 submittal was due mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	7 and 2018 to the T and the Final Date is r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	CEQ Beaumont s the estimated \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Regional Office	e. The Date Requ	ired is the initia dat	te ASRs al date s te of con tering 0.00 0.00 0.00 0.00 0.00	for the years 201 submittal was due mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	7 and 2018 to the T and the Final Date is r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	CEQ Beaumon s the estimated \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Regional Office	e. The Date Requ	ired is the initia dat	e ASRs al date s te of con tering 0.00 0.00 0.00 0.00 0.00 0.00	for the years 201 submittal was due mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	7 and 2018 to the T and the Final Date is r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	CEQ Beaumon s the estimated \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2019-1559-MWD-E	PCW
			North Orange Water & Sewe	r, LLC ("Facility No. 2")	Policy Revision 4 (April 2014
Dog		ase ID No.	50415 RN102078896		PCW Revision March 26, 201
Reg.	Ent. Rei		Water Quality		
	Enf. C		Steven Van Landingham		
	Viola	ation Number	11		
		Rule Cite(s)		5.125(1) and (5), Tex. Water Code § 26.121(a	ı <mark>)(1), and</mark>
			TPDES Permit No	b. WQ0011155001, Permit Conditions No. 2.g	
			Failed to prevent unautho	rized discharges of wastewater into or adjacer	
	Violatio	n Description		own in the attached Unauthorized Discharge T	
				Bas	e Penalty \$25,00
>> Env	/ironme	ntal. Prope	ty and Human Health	Matrix	
			Harm		
OR		Release Actual	Major Moderate	Minor	
UK		Potential		Percent 5.0%	
			II		
>>Prog	gramma	tic Matrix	Maiau Madauata	Minor	
		Falsification	Major Moderate	Minor Percent 0.0%	
			ΙΙ		·
	Matrix	Human heal	th or the environment has be	een exposed to insignificant amounts of polluta	ants as a
	Notes	Humannea		It of the violation.	
				Adjustment	\$23,750
					\$1,25
Violatio	on Event	ts			
		Number of \	/iolation Events 3	3 Number of violation	ave
		Number of v			uuys
			daily		
			weekly		
			monthly quarterly x	Violation Bas	e Penalty \$3,75
			semiannual		·
			annual		
			single event	1	
		Three quarte	rly avanta ara racammandad	for the discharges that occurred on May 14, 2	
				and January 24, 2019.	.017, May
Good F	aith Effo	orts to Com			Reduction \$93
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary x		
			N/A		
				ndent achieved compliance by January 24,	
			Notes		
				Violation	n Subtotal \$2,81
Fachar	nie Por-		this violation	Chakukamu Linui	t Toot
Econon	nic sene	TOP	this violation	Statutory Limi	liest
		Estimate	ed EB Amount	\$255 Violation Final Pen	alty Total \$6,00
			This vio	plation Final Assessed Penalty (adjusted i	for limits) \$6,00

		conomic		-	RSHEEL		
		Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.	50415						
leg. Ent. Reference No.	RN102078896						
-	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
violation No.	11					= -	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	ı						
-							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$3,000	14-May-2017	24-Jan-2019	1.70	\$255	n/a	\$255
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	Estimated Re	mediation/Dispos	al cost to cease	the una	authorized dischar	ges, and to clean an	d disinfect the
					harge). The Date	Required is the date	
		reas (\$1,000 for	each unauthoriz	ed disc		Required is the dut	e the initial
Notes for DELAYED costs	affected a					e date of the last dis	
Notes for DELAYED costs	affected a				e is the compliance		
	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean	e is the compliance up.		scharge and
Notes for DELAYED costs Avoided Costs Disposal	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean	e is the compliance up. item (except for	e date of the last dis	scharge and d costs)
Avoided Costs	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean tering	e is the compliance up.	e date of the last dis	scharge and
Avoided Costs Disposal Personnel	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean tering 0.00	e is the compliance up. item (except for \$0	e date of the last dis r one-time avoide \$0	charge and d costs) \$0
Avoided Costs Disposal Personnel	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean tering 0.00 0.00	e is the compliance up. item (except for \$0 \$0	e date of the last dis r one-time avoide \$0 \$0	charge and d costs) \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean tering 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0	e date of the last dis r one-time avoide \$0 \$0 \$0	charge and d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean tering 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0	e date of the last dis r one-time avoider \$0 \$0 \$0 \$0	charge and \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean 0.00 0.00 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	e date of the last dis one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	charge and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e date of the last dis r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scharge and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e date of the last dis r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scharge and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e date of the last dis r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scharge and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e date of the last dis r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scharge and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e date of the last dis r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scharge and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	affected a unauthoriz	ed discharge occu	urred and the Fi	nal Dat clean 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e is the compliance up. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e date of the last dis r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scharge and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2019-1559-MWD-E	PCW
			North Orange Water & Sew	er, LLC ("Facility No. 2")	Policy Revision 4 (April 2014)
Peg		Case ID No.	50415 RN102078896		PCW Revision March 26, 2014
Reg.	LIII. KEI		Water Quality		
	Enf. C		Steven Van Landingham		
	Viola	ation Number			1
		Rule Cite(s)	30 Tex. Admin. Code § 30	5.125(1) and (5), Tex. Water Code § 26.121(a)	(1), and
			TPDES Permit N	lo. WQ0011155001, Permit Conditions No. 2.g	
			Eailed to provent upouther	ized discharges of sewage wastewater into or ad	iacont to
	Violatio	n Description		shown in the attached Unauthorized Discharge	
				Base	Penalty \$25,000
>> Env	vironme	ntal, Prope	rty and Human Healtl	h Matrix	
			Harm		
OR		Release Actual		Minor	
ÖK		Potential		Percent 15.0%	
			· · · ·		
>>Prog	gramma	tic Matrix Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix	Human health		en exposed to significant amounts of pollutants a	<mark>s a result</mark>
	Notes			of the violation.	
				Adjustment	\$21,250
					\$3,750
Violatio	on Even	ts			
		Number of \	Violation Events <u>1</u>	<u> </u>	ays
			daily		
			weekly		
			monthly	Violation Pres	Denalty to 750
			quarterly semiannual	Violation Base	Penalty \$3,750
			annual		
			single event x		
		One single ev	ent is recommended for the	discharge that occurred at a residence on May 2	<mark>1, 2018.</mark>
Good F	aith Effe	orts to Com			eduction \$937
			Before NOE/NO	V NOE/NOV to EDPRP/Settlement Offer	
			Ordinary x		
			N/A		
			Notes The Respo	ndent achieved compliance by May 21, 2018.	
			ļ		
				Violation	Subtotal \$2,813
Econor	nic Bene	efit (EB) for	this violation	Statutory Limit	Test
		Estimate	ed EB Amount	\$0 Violation Final Pena	Ity Total \$6,001
		Lotinati			
			This vi	iolation Final Assessed Penalty (adjusted fo	r limits) \$6,001

	E	conomic	Benefit	VVO	rksneet		
Respondent	North Orange	Water & Sewer, L	LC ("Facility No	. 2")			
Case ID No.	50415						
Reg. Ent. Reference No.							
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
VIOIALIOII NO.	12						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$2,500	21-May-2018	21-May-2018	0.00	\$0	n/a	\$0
	ΨZ/300	21 1109 2010	21 110 2010	0.00	40	II/a	40
Permit Costs	\$2,500	21 110 2010	21 Huy 2010	0.00	\$0	n/a	\$0
· · ·	Estimated Re	emediation/Dispos	sal cost to cease	0.00 0.00 the un	\$0 \$0 authorized dischai	n/a n/a rge, and to clean an	\$0 \$0 d disinfect the
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is the cleane	\$0 \$0 authorized dischar ne date the unauth d up.	n/a n/a rge, and to clean an norized discharge oc	\$0 \$0 d disinfect the curred and was
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane	\$0 \$0 authorized dischai he date the unauth d up. item (except for	n/a n/a rge, and to clean an norized discharge oc r one-time avoide	\$0 \$0 d disinfect the curred and was d costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane tering 0.00	\$0 \$0 authorized dischan he date the unauth d up. item (except for \$0	n/a n/a rge, and to clean an norized discharge oc r one-time avoide \$0	\$0 \$0 d disinfect the curred and was d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane tering 0.00 0.00	\$0 \$0 authorized dischance the date the unauthe d up. item (except for \$0 \$0	n/a n/a rge, and to clean an porized discharge oc r one-time avoide \$0 \$0	\$0 \$0 d disinfect the curred and was d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane tering 0.00 0.00 0.00	\$0 \$0 authorized dischar the date the unauth d up. item (except for \$0 \$0 \$0 \$0	n/a n/a rge, and to clean an porized discharge oc r one-time avoide \$0 \$0 \$0	\$0 \$0 d disinfect the curred and was d costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane 0.00 0.00 0.00 0.00	\$0 \$0 authorized dischau he date the unauth d up. item (except fo \$0 \$0 \$0 \$0 \$0	n/a n/a rge, and to clean an porized discharge oc r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 d disinfect the curred and was d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 authorized dischar- be date the unauthorized dischar- be date the unauthorized dischar- ditem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a rge, and to clean an norized discharge oc r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 d disinfect the curred and was d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Enspection/Reporting/Sampling Supplies/Equipment	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane 0.00 0.00 0.00 0.00	\$0 \$0 authorized dischau he date the unauth d up. item (except fo \$0 \$0 \$0 \$0 \$0	n/a n/a rge, and to clean an porized discharge oc r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 d disinfect the curred and was d costs) \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 authorized dischance the date the unauthorized dischance the discrete dischance the discrete discret	n/a n/a rge, and to clean an norized discharge oc r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 d disinfect the curred and was d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated Re affected areas	mediation/Dispos . The Date Requ	sal cost to cease ired and Final D	0.00 0.00 the un ate is th cleane tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 authorized dischance the date the unauthorized dischance the discrete dischance the discrete discret	n/a n/a rge, and to clean an norized discharge oc r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 d disinfect the curred and was d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	North O	range Water & Sev	wer, LLC				
Docket No. 2019-1559-MWD-E							
TPDES Permit No. WQ0011155001							
	Unauthorized Discharge Table B						
Date	Amount Discharged (gallons)	Description	Corrective Action				
May 14, 2017	200	Sewage overflow from a manhole into a ditch at 25 Stratford Drive.	The manhole and line were cleaned and cleared of any debris. The area was cleaned and disinfected.				
May 21, 2018	500	Sewage overflowed into a house at 11 Medford Drive due to a stoppage in the main trunk line.	The main line was jetted. The area was cleaned and disinfected.				
May 21, 2018	500	Sewage overflow into a ditch due to a stoppage in the main trunk line.	The main line was jetted. The area was cleaned and disinfected.				
January 24, 2019	500	Sewage overflow at 6906 Lancaster Drive due to a stoppage in the main trunk line.	The main line was jetted. The area was cleaned and disinfected.				

Item 20

Item 21

August 04, 2017

October 09, 2017

Compliance History Report

THE MENT	Compliance H)678098, RN102078136, F		ch includes Compliand	ce History (CH)
		ndent, CN600678098	14, through August 31, 20, North Orange Water &	Classification	: SATISFACTORY	Rating: 15.16
	gulated Entity:		, Country Squire Plant	Classification	SATISFACTORY	Rating: 0.89
Со	nplexity Point	s: 4		Repeat Violato	r: NO	
СН	Group:	08 - Sewage T	reatment Facilities			
	ation: EQ Region:		Highway 10 and approxin , Texas			section of State Highway 87 rict of the City of Orange in
WA WA	STEWATER LICE	MIT WQ0011589001 ENSING LICENSE WQ00		STEWATER EPA ID T 2019 Rating Ye		ng Date: 09/01/2019
	-	-				iig Date. 09/01/2019
	-		pared: May 06, 2020			
Age	ency Decision	Requiring Complian	ce History: Enforcem	ient		
Со	mponent Perio	d Selected: May 06	, 2015 to May 06, 2020			
TCI	EQ Staff Memb	er to Contact for Ac	ditional Information	Regarding This	Compliance Histo	ry.
	Name: Steven	Van Landingham		Phone:	(512) 239-5717	
Sit	e and Owner	/Operator History	<u>/:</u>			
			ation for the full five year	compliance period?	YES	
2) H	las there been a (known) change in owner	rship/operator of the site of	during the compliance	e period? NO	
Co	<u>mponents (M</u>	ultimedia) for the	e Site Are Listed in	Sections A - J		
Α.	Final Orders, N/A	court judgments, a	nd consent decrees:			
В.	Criminal conv	ictions:				
_	N/A					
C.	N/A	sive emissions eve	nts:			
D.	The approval	dates of investigati	ons (CCEDS Inv. Trad	ck. No.):		
		ay 27, 2015	(1262925)	Item 22	November 01, 20	17 (1450780)
		une 25, 2015	(1270080)	Item 23	November 27, 20	17 (1462112)
		uly 29, 2015	(1277609)	Item 24	December 12, 20	17 (1468494)
		ctober 01, 2015	(1290944)	Item 25	January 12, 2018	· ·
		ecember 01, 2015	(1302583)	Item 26	May 08, 2018	(1501276)
		anuary 06, 2016	(1316320)	Item 27	July 09, 2018	(1514696)
		ebruary 25, 2016	(1325687)	Item 28	September 13, 20	
		pril 15, 2016	(1339578)	Item 29	September 14, 20	
		une 24, 2016	(1346397)	Item 30	November 13, 20	· ,
		ıly 21, 2016 eptember 22, 2016	(1359795) (1366238)	Item 31	December 18, 20	. ,
		ovember 21, 2016	(1385061)	Item 32	January 07, 2019	· ·
		ecember 21, 2016	(1391186)	Item 33	February 07, 2019	
			. ,	Item 34	March 19, 2019	(1561661)
		ebruary 09, 2017	(1397814)	Item 35 Item 36	April 09, 2019 May 09, 2019	(1572479)
		larch 10, 2017	(1411790)	Item 36 Item 37	August 08, 2019	(1584570) (1600147)
		lay 09, 2017	(1425889)	Item 37	September 10, 20	
		une 09, 2017 uly 12, 2017	(1431934) (1440502)	Item 39	October 08, 2019	
		10 12, 2017	(1440502) (1444183)	Item 40	December 05, 2019	

(1444183)

(1456645)

Item 40

Item 41

December 05, 2019

January 09, 2020

(1627070)

(1634700)

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.

0			
1	Date: 05/31/2019 (1584571)		
	Self Report? YES	Classification:	Moderate
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)	
	30 TAC Chapter 305, SubChapter F 305.125	5(1)	
	Description: Failure to meet the limit for one or more pe	rmit parameter	
2	Date: 06/30/2019 (1593818)		
	Self Report? YES	Classification:	Moderate
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(,	
	30 TAC Chapter 305, SubChapter F 305.125	()	
	Description: Failure to meet the limit for one or more pe	rmit parameter	
3	Date: 10/31/2019 (1619705)		
	Self Report? YES	Classification:	Moderate
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(,	
	30 TAC Chapter 305, SubChapter F 305.125	• •	
4	Description: Failure to meet the limit for one or more pe	rmit parameter	
4	Date: 01/31/2020 (1641313)		M . I
	Self Report? YES	Classification:	Moderate
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(
	30 TAC Chapter 305, SubChapter F 305.125	()	
	Description: Failure to meet the limit for one or more pe	rmit parameter	
F. Environr	nental audits:		

N/A

- G. Type of environmental management systems (EMSs): $_{N/A} \label{eq:mass_system}$
- H. Voluntary on-site compliance assessment dates:

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N/A
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- I. Participation in a voluntary pollution reduction program: $_{N/A} \label{eq:N/A}$
- J. Early compliance:
 - N/A
- Sites Outside of Texas:

N/A

Component Appendices

Appendix All NOVs		During Comp	oonent Period 5/6/2015 and 5/6/2020	
1	Date:	07/31/2015	(1283791)	
			Classification	: Moderate
	Self Repo Citation:	2D TWC	For Informational Purposes Chapter 26, SubChapter A 26.121(a)	s Only
	Description		Chapter 305, SubChapter F 305.125(1) o meet the limit for one or more permit paramet	er
2	Date:	10/31/2015	(1302584) Classification	
	Self Repo Citation: Descriptio	2D TWC 30 TAC (For Informational Purposes Chapter 26, SubChapter A 26.121(a) Chapter 305, SubChapter F 305.125(1) o meet the limit for one or more permit paramet	
3	Date:	11/30/2015	(1309536)	
			Classification	
	Self Repo	ort? YES	For Informational Purposes	s Only
	Citation: Description	30 TAC (Chapter 26, SubChapter A 26.121(a) Chapter 305, SubChapter F 305.125(1) o meet the limit for one or more permit paramet	er
	p			
4	Date:	04/30/2016	(1346398) Classification	
	Self Repo		For Informational Purposes	s Only
	Citation: Description	30 TAC (Chapter 26, SubChapter A 26.121(a) Chapter 305, SubChapter F 305.125(1) o meet the limit for one or more permit paramet	er
_				
5	Date:	08/31/2016	(1372914) Classification	
	Self Repo		For Informational Purposes	s Only
	Citation: Description	30 TAC (Chapter 26, SubChapter A 26.121(a) Chapter 305, SubChapter F 305.125(1) o meet the limit for one or more permit paramet	er
6	Date:	09/30/2016	(1379107) Classification	: Moderate
	Self Repo Citation:		For Informational Purposes Chapter 26, SubChapter A 26.121(a)	SONY
	Citation.		Chapter 20, SubChapter F 305.121(a)	
	Descripti	on: Failure to	o meet the limit for one or more permit paramet	er
7	Date:	02/07/2017	(1388325) Classification	: Moderate
	Self Repo	ort? NO	For Informational Purposes	
	Citation:	OpR 1 PE		5 Only
	Descriptio	on: Failure b	y North Orange Water and Sewer, LLC to proper collection, treatment, and disposal.	ly operate and maintain
8	Date:	03/31/2017	(1418292)	
			Classification	
	Self Repo	ort? YES	For Informational Purposes	s Only
	Citation:	30 TAC (Chapter 26, SubChapter A 26.121(a) Chapter 305, SubChapter F 305.125(1)	or.
	Description	on: Failure to	o meet the limit for one or more permit paramet	er
9	Date:	08/10/2017	(1424579)	

		Classification: Minor
Self Report?	NO	For Informational Purposes Only
Citation:	30 TAC C	hapter 305, SubChapter F 305.125
Description:		v North Orange Water and Sewer to ensure that the facility and all of its of collection, treatment, and disposal are properly operated and ed.
		Classification: Minor
Self Report? Citation:	NO Opp No	For Informational Purposes Only 1, Page 13 PERMIT
Description:	Failure by	North Orange Water and Sewer to ensure that the facility and all of its of collection, treatment, and disposal are properly operated and
	maintaint	Classification: Moderate
Self Report?	NO	For Informational Purposes Only
Citation:		g), Page 9 PERMIT
Description:	Fallure by	North Orange Water and Sewer to prevent the unauthorized discharge
	of waste.	Classification: Minor
	No	
Self Report? Citation:	NO 30 TAC C	For Informational Purposes Only hapter 305, SubChapter F 305.125(11)(C)(vi)
Description:	M&RR No	. 3(c)(vi), Page 9 PERMIT North Orange Water and Sewer - Country Squire to maintain quality
Description	control re	cords.
		Classification: Minor
Self Report? Citation:		For Informational Purposes Only . 7(c), Page 7 PERMIT
Description:		North Orange Water and Sewer to submit notifiction of a greater than
		eedance within 5 working days of becoming aware. Classification: Minor
Self Report?	NO	For Informational Purposes Only
Citation:	•	1, Page 13 PERMIT
Description:		North Orange Water and Sewer to ensure at all times that the facility its systems of collection, treatment, and disposal are properly operated tained.
		Classification: Minor
Self Report? Citation:		For Informational Purposes Only D. 2, Page 2 PERMIT
Description:	Failure by	North Orange Water and Sewer to discharge effluent within permitted chlorine residual.
		Classification: Minor
Self Report?	NO	For Informational Purposes Only
Citation:	30 TAC C M&RR No	hapter 319, SubChapter A 319.11(a) . 2(a), Page 5 PERMIT
Description:		North Orange Water and Sewer to comply with 30 TAC 319.11-319.12.
Date: 01/	31/2018	(1487405) Classification: Moderate
Self Report?	YES	For Informational Purposes Only
Citation:	2D TWC (Chapter 26, SubChapter A 26.121(a)
Description:		hapter 305, SubChapter F 305.125(1) meet the limit for one or more permit parameter
Date: 02/	28/2018	(1491079)
		Classification: Moderate
Self Report?	YES	For Informational Purposes Only
Citation:		Chapter 26, SubChapter A 26.121(a) hapter 305, SubChapter F 305.125(1)
Description:		meet the limit for one or more permit parameter
Date: 03/	31/2018	(1494328)

	Classification: Moderate
	Self Report? YES For Informational Purposes Only
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)
	Description: Failure to meet the limit for one or more permit parameter
13	Date: 05/31/2018 (1508363)
	Classification: Moderate
	Self Report? YES For Informational Purposes Only
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)
	Description: Failure to meet the limit for one or more permit parameter
14*	Date: 09/30/2018 (1534278)
	Classification: Moderate
	Self Report? YES For Informational Purposes Only
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
	30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter
15*	Date: 05/31/2019 (1584571)
	Classification: Moderate
	Self Report?YESFor Informational Purposes OnlyCitation:2D TWC Chapter 26, SubChapter A 26.121(a)
	30 TAC Chapter 305, SubChapter F 305.125(1)
	Description: Failure to meet the limit for one or more permit parameter
16*	Date: 06/30/2019 (1593818)
	Classification: Moderate
	Self Report? YES For Informational Purposes Only
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
	30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter
	Description: Failure to meet the limit for one or more permit parameter
17	Date: 10/31/2019 (1619705)
	Classification: Moderate
	Self Report?YESFor Informational Purposes OnlyCitation:2D TWC Chapter 26, SubChapter A 26.121(a)
	30 TAC Chapter 305, SubChapter F 305.125(1)
	Description: Failure to meet the limit for one or more permit parameter
18	Date: 01/31/2020 (1641313)
	Classification: Moderate
	Self Report? YES For Informational Purposes Only
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
	30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter
	• •

* NOVs applicable for the Compliance History rating period 9/1/2014 to 8/31/2019

Appendix B All Investigations Conducted During Component Period May 06, 2015 and May 06, 2020

Item 1*	May 27, 2015**	(1262925) For Informational Purposes Only		
(1270080)				
Item 2*	June 25, 2015**	For Informational Purposes Only		
		(1277609)		
Item 3*	July 29, 2015**	For Informational Purposes Only		

		(1283791)
Item 4	September 11, 2015*	*For Informational Purposes Only
Item 5*	October 01, 2015**	⁽¹²⁹⁰⁹⁴⁴⁾ For Informational Purposes Only
Item 6*	December 01, 2015**	(1302583) For Informational Purposes Only
Item 7*	January 06, 2016**	(1316320) For Informational Purposes Only
Item 8	January 07, 2016**	(1309536) For Informational Purposes Only
Item 9	January 11, 2016**	(1287976) For Informational Purposes Only
Item 10*	February 25, 2016**	(1325687) For Informational Purposes Only (1339578)
Item 11*	April 15, 2016**	For Informational Purposes Only (1323779)
Item 12	May 10, 2016**	For Informational Purposes Only (1346397)
Item 13*	June 24, 2016**	For Informational Purposes Only (1359795)
Item 14*	July 21, 2016**	For Informational Purposes Only
Item 15	September 15, 2016*	(1372914) *For Informational Purposes Only
Item 16*	September 22, 2016*	(1366238) *For Informational Purposes Only
Item 17	October 20, 2016**	(1379107) For Informational Purposes Only
Item 18*	November 21, 2016**	(1385061) For Informational Purposes Only (1391186)
Item 19*	December 21, 2016**	For Informational Purposes Only (1397814)
Item 20*	February 09, 2017**	For Informational Purposes Only (1411790)
Item 21*	March 10, 2017**	For Informational Purposes Only
Item 22	April 07, 2017**	(1418292) For Informational Purposes Only
Item 23*	May 09, 2017**	(1425889) For Informational Purposes Only
Item 24*	June 09, 2017**	(1431934) For Informational Purposes Only

		(1440502)
Item 25*	July 12, 2017**	For Informational Purposes Only
		(1444183) For Informational Durnages Only
Item 26*	August 04, 2017**	For Informational Purposes Only (1424579)
Item 27	August 10, 2017**	For Informational Purposes Only
		(1456645)
Item 28*	October 09, 2017**	For Informational Purposes Only
Item 29	October 25, 2017**	(1443367) For Informational Purposes Only
Item 29	October 25, 2017	(1450780)
Item 30*	November 01, 2017**	For Informational Purposes Only
		(1462112)
Item 31*	November 27, 2017**	For Informational Purposes Only
Item 32*	December 12, 2017**	(1468494) For Informational Purposes Only
		(1475194)
Item 33*	January 12, 2018**	For Informational Purposes Only
Item 34	February 09, 2018**	For Informational Purposes Only
Item 35	March 09, 2018**	(1491079) For Informational Purposes Only
		(1494328)
Item 36	April 09, 2018**	For Informational Purposes Only
Item 27*	May 00 2010**	(1501276) For Informational Purposes Only
Item 37*	May 08, 2018**	(1508363)
Item 38	June 08, 2018**	For Informational Purposes Only
		(1514696)
Item 39*	July 09, 2018**	For Informational Purposes Only
Item 40	August 28, 2018**	(1512139) For Informational Purposes Only
Item 41*	Sentember 13 2018*	(1527928) *For Informational Purposes Only
	September 13, 2010	(1520752)
Item 42*	September 14, 2018*	*For Informational Purposes Only
		(1534278)
Item 43	October 09, 2018**	For Informational Purposes Only
Item 44	October 17, 2018**	(1523486) For Informational Purposes Only
		(1523848)
Item 45	October 26, 2018**	For Informational Purposes Only
		Page 7

Item 46*	November 13, 2018**	(1542112) For Informational Purposes Only
Item 47*	December 18, 2018**	(1545882) For Informational Purposes Only
Item 48*	January 07, 2019**	(1561662) For Informational Purposes Only
Item 49*	February 07, 2019**	(1561660) For Informational Purposes Only
Item 50*	March 19, 2019**	(1561661) For Informational Purposes Only
Item 51	March 28, 2019**	(1551851) For Informational Purposes Only
Item 52*	April 09, 2019**	(1572479) For Informational Purposes Only
Item 53*	May 09, 2019**	(1584570) For Informational Purposes Only
Item 54	June 11, 2019**	(1584571) For Informational Purposes Only
Item 55	July 16, 2019**	(1593818) For Informational Purposes Only
Item 56*	August 08, 2019**	(1600147) For Informational Purposes Only
Item 57*	September 10, 2019	(1607046) For Informational Purposes Only
Item 58*	October 08, 2019	(1613895) For Informational Purposes Only
Item 59	November 07, 2019	(1619705) For Informational Purposes Only
Item 60*	December 05, 2019	(1627070) For Informational Purposes Only
Item 61*	January 09, 2020	(1634700) For Informational Purposes Only
Item 62	February 11, 2020	(1641313) For Informational Purposes Only

* No violations documented during this investigation **Investigation applicable for the Compliance History Rating period between 09/01/2014 and 08/31/2019.

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Compliance History Report

Compliance History Report for CN600678098, RN102078896, Rating Year 2019 which includes Compliance History (CH) components from September 1, 2014, through August 31, 2019. Customer, Respondent, CN600678098, North Orange Water & **Classification:** SATISFACTORY Rating: 15.16 or Owner/Operator: Sewer, LLC **Regulated Entity:** Classification: SATISFACTORY **Rating:** 29.44 RN102078896, Longford Place Repeat Violator: NO **Complexity Points:** 4 CH Group: 08 - Sewage Treatment Facilities Location: 6602 Lancaster Drive in Orange County, Texas **TCEQ Region: REGION 10 - BEAUMONT** ID Number(s): WASTEWATER PERMIT WO0011155001 WASTEWATER EPA ID TX0053562 PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 1810015 Compliance History Period: September 01, 2014 to August 31, 2019 Rating Date: 09/01/2019 Rating Year: 2019 Date Compliance History Report Prepared: May 06, 2020 Agency Decision Requiring Compliance History: Enforcement Component Period Selected: May 06, 2015 to May 06, 2020 TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History. Name: Steven Van Landingham Phone: (512) 239-5717 Site and Owner/Operator History: 1) Has the site been in existence and/or operation for the full five year compliance period? YES 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO Components (Multimedia) for the Site Are Listed in Sections A - J A. Final Orders, court judgments, and consent decrees: 1 Effective Date: 06/12/2015 ADMINORDER 2014-1857-MWD-E (Findings Order-Agreed Order Without Denial) Classification: Moderate Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1) 30 TAC Chapter 305, SubChapter F 305.125(1) Rgmt Prov: Effluent Limits PERMIT Description: Failure to comply with permit effluent limits as documented by a TCEQ record review of self-reported data. ADMINORDER 2015-0604-MWD-E (1660 Order-Agreed Order With Denial) 2 Effective Date: 01/14/2016 Classification: Minor Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Rgmt Prov: OpR 1 PERMIT Description: Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal, as documented during an investigation conducted on February 5, 2015. Specifically, the clarifiers were corroded, floating solids and grease were present, the water was turbid, and debris and algae were on the weir. Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Rqmt Prov: OpR No. 1, Pg. 13 OP Description: Failed to properly operate and maintain the Facility and all of its systems of collection, treatment, and disposal, as documented during an investigation conducted on February 5, 2015. Specifically, the high velocity in which the wastewater was discharging from the return pipe into the aeration basin caused wastewater to splash onto Facility equipment. Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) Rqmt Prov: D&SPC No. 2(e), Pg. 4 OP Description: Failed to perform all measurements, tests and calculations in a representative manner to ensure the accurate reporting of data, as documented during an investigation conducted on February 5, 2015. Specifically, the Respondent was using a simple arithmetic average to calculate daily average E. coli values instead of the correct geometric mean method. Classification: Moderate 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: 30 TAC Chapter 305, SubChapter F 305.125(9)(A) Rqmt Prov: M&RR No. 7(a)(c), Pg. 7 OP Description: Failed to report any effluent violation which deviates from the permitted limitation by more than 40% in

writing to the Beaumont Regional Office and the Enforcement Division within five working days of becoming aware of the noncompliance events in November 2013, and February and May 2014, as documented during an investigation conducted on February 5, 2015.

Classification: Minor

3

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

30 TAC Chapter 305, SubChapter F 305.125(17)

Description: Failed to timely submit the annual sludge report to the Beaumont Regional Office by September 30, 2014, as documented during an investigation conducted on February 5, 2015.

Effective Date: 10/25/2016 ADMINORDER 2016-0573-PWS-E (1660 Order-Agreed Order With Denial) Classification: Moderate

Citation 30 TAC Chapter 200

Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)

30 TAC Chapter 290, SubChapter F 290.117(h)

30 TAC Chapter 290, SubChapter F 290.117(i)(1)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.86

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.90(a)

Description: LCR IN MR 1st 6M2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2015 to 06/30/2015 within the required timeline. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.117(e)(2)(A)

30 TAC Chapter 290, SubChapter F 290.117(h)

30 TAC Chapter 290, SubChapter F 290.117(i)(3)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.87

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.90(a)

Description: LCR WQP MR - The system failed to monitor for water quality parameters in accordance with TCEQ rules two times during the 2nd 6M2015 monitoring period at entry point location 10 Finwick Dr, Orange (EP001) and/or the distribution system.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.117(e)(2)

30 TAC Chapter 290, SubChapter F 290.117(h)

30 TAC Chapter 290, SubChapter F 290.117(i)(3)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.87

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.90(a)

Description: LCR WQP MR - The system failed to monitor for water quality parameters in accordance with TCEQ rules two times during the 1st 6M2015 monitoring period at entry point location 10 Finwick Dr, Orange (EP001) and/or the distribution system.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.117(d)(2)(A)

30 TAC Chapter 290, SubChapter F 290.117(h)

30 TAC Chapter 290, SubChapter F 290.117(i)(2)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.88

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.90(b)

Description: LCR SOWT MR - The system failed to monitor for source water treatment in accordance with TCEQ rules after exceeding the lead action level during the reduced monitoring period from 01/01/2014 to 12/31/2014 plus 180 days. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.117(f)(3)(A)

30 TAC Chapter 290, SubChapter F 290.117(i)(7)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.81(e)(1)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.82(a)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.90(c)(2)

Description: LCR OCCT - The system failed to submit the Optimal Corrosion Control Treatment (OCCT) Recommendation in accordance with TCEQ rules after exceeding the lead action level during the reduced monitoring period from 01/01/2014 to 12/31/2014 plus 180 days.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.117(g)(2)(A)

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.83

40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.90(d)(1)

Description: LCR SOWT - The system failed to submit the Source Water Treatment Recommendation for alternative treatment including ion exchange, reverse osmosis, lime softening, coagulation/filtration, or none from the end of the six-month monitoring period from reduced monitoring period from 01/01/2014 to 12/31/2014 plus 180 days. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(2)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR OCCT TT PN 06/01/2014 to 09/30/2014 Posting and Reporting Violation - Failure to submit a signed

Rqmt Prov: OR No. 7, Pg. 32 OP

certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation for a failure to submit the OCCT Recommendation after an action level exceedance during the monitoring period from 01/01/2014 to 12/31/2014. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(2)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR SOWT TT PN 06/01/2014 to 09/30/2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code \$290.122 during the time period that public notice was required for a violation for a failure to submit the SOWT recommendation after an action level exceedance during the monitoring period from 01/01/2014 to 12/31/2014. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR SOWT PN 06/01/2014 to 09/30/2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation for a failure to monitor for source water treatment after an action level exceedance during the monitoring period from 01/01/2014 to 12/31/2014. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR WQP PN 1st 6M2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a water quality parameter monitoring and reporting violation for the monitoring period from 01/01/2015 to 06/30/2015 at the entry point and/or the distribution system. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR RD MR PN 3Y2013 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution lead and copper reduced monitoring and reporting violation for the triennial reduced monitoring period from 01/01/2011 to 12/31/2013. Classification: Minor

Citation: 2A TWC Chapter 5, SubChapter A 5.702

30 TAC Chapter 291, SubChapter D 291.76

Description: Failed to pay regulatory assessment fees for the TCEQ Public Utility Account regarding Certificate of Convenience and Necessity No. 11511 for calendar years 2014 and 2015.

Effective Date: 02/13/2018 ADMINORDER 2016-2008-PWS-E (1660 Order-Agreed Order With Denial) Classification: Moderate

30 TAC Chapter 290, SubChapter F 290.117(i)(6) Citation:

30 TAC Chapter 290, SubChapter F 290.117(j)

Description: LCR LCN - The system failed to provide a consumer notice of lead tap water monitoring results to persons served at the sites (taps) that were tested during the six-month monitoring period from 01/01/2016 to 06/30/2016. Classification: Moderate

30 TAC Chapter 290, SubChapter F 290.117(i)(6) Citation:

30 TAC Chapter 290, SubChapter F 290.117(j)

Description: LCR LCN - The system failed to provide a consumer notice of lead tap water monitoring results to persons served at the sites (taps) that were tested during the six-month monitoring period from 07/01/2015 to 12/31/2015. Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.117(f)(1)(A)(ii)

30 TAC Chapter 290, SubChapter F 290.117(i)(7)

Description: LCR SCC - The system failed to submit the Study for Corrosion (SCC) in accordance with TCEQ rules 290.117(f) and 290.117(i) after exceeding the lead action level from the end of the reduced monitoring period from 01/01/2014 to 12/31/2014 plus 365 days.

B. Criminal convictions:

N/A

4

C. Chronic excessive emissions events:

N/A

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

	5	•	,		
Item 1	May 27, 2015	(1262873)	Item 9	June 24, 2016	(1346355)
Item 2	June 25, 2015	(1270037)	Item 10	July 21, 2016	(1359754)
Item 3	July 29, 2015	(1277566)	Item 11	September 15, 2016	(1372874)
Item 4	August 25, 2015	(1283744)	Item 12	September 22, 2016	(1366189)
Item 5	October 01, 2015	(1290902)	Item 13	October 20, 2016	(1379060)
Item 6	December 01, 2015	(1302541)	Item 14	December 21, 2016	(1391143)
Item 7	January 06, 2016	(1316276)	Item 15	February 09, 2017	(1397770)
Item 8	January 07, 2016	(1309484)	Item 16	March 10, 2017	(1411748)

		(, , , , , , , , , , , , , , , , , , ,			(
Item 17	April 07, 2017	(1418249)	Item 33	November 13, 2018	(1542071)
Item 18	June 09, 2017	(1431889)	Item 34	December 18, 2018	(1545841)
Item 19	July 12, 2017	(1440460)	Item 35	January 07, 2019	(1561537)
Item 20	October 09, 2017	(1456605)	Item 36	February 07, 2019	(1561535)
Item 21	November 27, 2017	(1462069)	Item 37	March 19, 2019	(1561536)
Item 22	December 12, 2017	(1468453)	Item 38	May 09, 2019	(1584490)
Item 23	January 12, 2018	(1475150)	Item 39	June 11, 2019	(1584491)
Item 24	February 09, 2018	(1487364)	Item 40	July 16, 2019	(1593778)
Item 25	March 09, 2018	(1491039)	Item 42	August 29, 2019	(1600106)
Item 26	April 09, 2018	(1494289)	Item 43	September 10, 2019	(1607007)
Item 27	May 08, 2018	(1501238)	Item 44	October 08, 2019	(1613854)
Item 28	June 08, 2018	(1508322)	Item 45	November 07, 2019	(1619666)
Item 29	June 11, 2018	(1490198)	Item 46	December 05, 2019	(1627032)
Item 30	July 09, 2018	(1514655)	Item 47	January 09, 2020	(1634659)
Item 31	September 13, 2018	(1520710)	Item 48	February 11, 2020	(1641273)
Item 32	October 09, 2018	(1534236)	Item 49	March 06, 2020	(1626257)

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): $_{\mbox{N/A}}$
- H. Voluntary on-site compliance assessment dates: $_{\mbox{N/A}}$
- I. Participation in a voluntary pollution reduction program: \$N/A\$
- J. Early compliance: N/A
- Sites Outside of Texas:

N/A

Component Appendices

Appendix A All NOVs Issued During Component Period 5/6/2015 and 5/6/2020

1	Date:	08/03/2015	(1322621)		Mala
				Classificatio	
	Self Repor	rt? NO	For Info	mational Purpose	es Only
	Citation:			Chapter F 290.117(c)(2)(A)(i)	
				Chapter F 290.117(h)	
				Chapter F 290.117(i)(1) Chapter D, PT 141, SubPT I 1 [.]	41 86
				Chapter D, PT 141, SubPT I 1	
	Descriptio			The system failed to monitor a	
				the TCEQ for the initial six-mo 0/2015 within the required tin	
2	D .	00/17/2015	(1274022)		
2	Date:	09/17/2015	(1274823)	Classificatio	n: Minor
	Self Repor	rt? NO	For Info	mational Purpose	es Only
	Citation:			Chapter D 290.46(v)	
	Descriptio			ace Water System to maintair	all electrical wiring
		,		liance with a local or national Classificatio	electrical code.
	Self Repor	rt? NO	For Info	mational Purpose	es Only
	Citation:	30 TAC C		Chapter D 290.46(m)	,
	Descriptio		-	ace Water System to maintair	the well pump for well no.
		2 in a goo	od, working con	lition.	
3	Date:	09/30/2015	(1302540)		
				Classificatio	n: Moderate
	Self Repor	rt? YES	For Info	mational Purpose	es Only
	Citation:			Chapter A 26.121(a)	2
		30 TAC C	hapter 305, Su	Chapter F 305.125(1)	
	Descriptio	n: Failure to	meet the limit	or one or more permit parame	eter
4	Date:	01/31/2016	(1346353)		
				Classificatio	n: Moderate
	Self Repor	rt? YES	For Info	mational Purpose	es Only
	Citation:			Chapter A 26.121(a)	
	D		•	Chapter F 305.125(1)	
	Descriptio	n: Failure to	meet the limit	or one or more permit parame	eter
5	Date:	02/29/2016	(1346354)		
				Classificatio	
	Self Repor			mational Purpose	es Only
	Citation:			Chapter A 26.121(a) Chapter F 305.125(1)	
	Descriptio			or one or more permit parame	eter
	Descriptio				
6	Date:	03/31/2016	(1339535)		
				Classificatio	
	Self Repor			mational Purpose	es Only
	Citation:			Chapter A 26.121(a)	
	Doccriptio		•	Chapter F 305.125(1) or one or more permit parame	stor
	Descriptio	II. Fallure to	meet the mint		
7	Date:	04/29/2016	(1369888)		
				Classificatio	
	Self Repor	rt? NO	For Info	mational Purpose	es Only
	Citation:			Chapter F 290.117(i)(6)	
	Descriptio			Chapter F 290.117(j) led to provide a consumer not	ice of lead tan water
	2000100			sons served at the sites (taps)	

the six-month monitoring period from 07/01/2015 to 12/31/2015.

	10/00/0016	(1262222)		
Date:	10/20/2016	(1369888)	Classification:	Moderate
Self Repo	rt? NO	For Informa	ational Purposes C	nlv
Citation:	30 TAC	Chapter 290, SubChap	ter F 290.117(i)(6)	,
Descriptic		Chapter 290, SubChap		load tap water
Descriptic	monitor	ing results to persons s	o provide a consumer notice of served at the sites (taps) that v od from 01/01/2016 to 06/30/2 Classification:	were tested during
Self Repo	rt? NO	For Informa	ational Purposes C	
Citation:	30 TAC	Chapter 290, SubChap	ter F 290.117(f)(1)(A)(ii)	
Descriptic		Chapter 290, SubChap C - The system failed to	ter F 290.117(i)(7) o submit the Study for Corrosic	n (SCC) in
	action le		90.117(f) and 290.117(i) after e reduced monitoring period fro	
Date:	10/31/2016	(1385015)		
			Classification:	Moderate
Self Repo			ational Purposes C	nly
Citation:		C Chapter 26, SubChapt Chapter 305, SubChap		
Descriptio			e or more permit parameter	
Date:	01/31/2017	(1404657)		
			Classification:	Moderate
Self Repo	rt? YES	For Informa	ational Purposes C	nly
Citation:		C Chapter 26, SubChapt Chapter 305, SubChap	ter A 26.121(a)	,
Descriptio	on: Failure	to meet the limit for on	e or more permit parameter	
Date:	04/17/2017	(1396338)		M
		Ear Informa	Classification:	Moderate
Self Repo			tional Purposes C	лпу
Citation:	30 TAC	Chapter 305, SubChap Chapter 305, SubChap . 1, Pg. 13 OP		
Description	on: Failed to		maintain the Facility and all of	its systems of
Descriptic	conduct wastew	ed on February 5, 2015 ater was discharging fr	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer	investigation in which the
Descriptio	conduct wastew	ed on February 5, 2019 ater was discharging fra ater to splash onto Faci	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification:	investigation in which the ation basin cause Minor
Self Repo	conduct wastew wastew	ed on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes C	investigation in which the ation basin cause Minor
Self Repo Citation:	conduct wastew wastew rt? NO M&RR, I	ed on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes C IT	investigation v in which the vation basin cause Minor Minor
Self Repo	conduct wastew wastew rt? NO M&RR, I	ed on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes C	investigation v in which the vation basin cause Minor Minor
Self Repo Citation:	conduct wastew wastew rt? NO M&RR, I on: Failure	ed on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes C IT r and Sewer to comply with 30	investigation v in which the ration basin cause Minor Only TAC 319.11-319.1 Minor
Self Repo Citation: Descriptic Self Repo Citation:	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No	ed on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: Ational Purposes C IT and Sewer to comply with 30 Classification: Ational Purposes C	investigation v in which the vation basin cause Minor Only TAC 319.11-319. Minor
Self Repo Citation: Descriptic Self Repo	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No on: Failure	ed on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT by North Orange Water	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: Ational Purposes O IT r and Sewer to comply with 30 Classification:	investigation v in which the vation basin cause Minor Minor TAC 319.11-319.1 Minor Minor Minor
Self Repo Citation: Descriptic Self Repo Citation:	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No on: Failure of colled	ted on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT by North Orange Water ction, treatment, and di	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes C T and Sewer to comply with 30 Classification: ational Purposes C and Sewer to ensure at all tim isposal are properly operated a	investigation v in which the vation basin cause Minor Cally TAC 319.11-319.1 Minor Minor Minor Minor Minor Minor
Self Repo Citation: Descriptic Self Repo Citation: Descriptic Self Repo Citation:	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No OpR No of collec rt? NO PC No.	ted on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT by North Orange Water ction, treatment, and di For Informa 1(a), Page 9 PERMIT	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes O Classification: ational Purposes O r and Sewer to comply with 30 Classification: ational Purposes O r and Sewer to ensure at all time isposal are properly operated a Classification: ational Purposes O	investigation v in which the vation basin cause Minor Minor TAC 319.11-319.1 Minor Minor Minor Minor Minor Minor Minor
Self Repo Citation: Descriptic Self Repo Citation: Descriptic Self Repo	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No OpR No of colled rt? NO PC No. on: Failure	ted on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT by North Orange Water ction, treatment, and di For Informa 1(a), Page 9 PERMIT	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes O T and Sewer to comply with 30 Classification: ational Purposes O and Sewer to ensure at all time isposal are properly operated a Classification: ational Purposes O and Sewer to properly report	investigation v in which the vation basin cause Minor Minor TAC 319.11-319.1 Minor Minor Minor Minor Minor Minor Minor
Self Repo Citation: Descriptic Self Repo Citation: Descriptic Self Repo Citation:	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No OpR No of colled rt? NO PC No. on: Failure	ted on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT by North Orange Water ction, treatment, and di For Informa 1(a), Page 9 PERMIT by North Orange Water	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes O T and Sewer to comply with 30 Classification: ational Purposes O and Sewer to ensure at all time isposal are properly operated a Classification: ational Purposes O and Sewer to properly report	investigation v in which the vation basin cause Minor Minor TAC 319.11-319.1 Minor Minor Minor Minor Minor Minor Minor
Self Repo Citation: Descriptic Self Repo Citation: Descriptic Self Repo Citation: Descriptic	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No OpR No OpR No of colled rt? NO PC No. pr: Failure for E. co	ted on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT by North Orange Water ction, treatment, and di For Informa 1(a), Page 9 PERMIT by North Orange Water oli in the correct monito (1425839)	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes O T and Sewer to comply with 30 Classification: ational Purposes O and Sewer to ensure at all tim isposal are properly operated a Classification: ational Purposes O and Sewer to properly report oring period. Classification:	investigation v in which the vation basin cause Minor mly TAC 319.11-319. Minor mly nes that all system nd maintained. Minor monitoring results Moderate
Self Repo Citation: Descriptic Self Repo Citation: Descriptic Self Repo Citation: Descriptic	conduct wastew wastew rt? NO M&RR, I on: Failure rt? NO OpR No OpR No OpR No Or: Failure of colled rt? NO PC No. on: Failure for E. co 04/30/2017 rt? YES	ted on February 5, 2019 ater was discharging fro ater to splash onto Faci For Informa No. 2(a), Page 5 PERMI by North Orange Water For Informa . 1, Page 13 PERMIT by North Orange Water ction, treatment, and di For Informa 1(a), Page 9 PERMIT by North Orange Water oli in the correct monito (1425839)	osal, as documented during an 5. Specifically, the high velocity om the return pipe into the aer ility equipment. Classification: ational Purposes O T and Sewer to comply with 30 Classification: ational Purposes O r and Sewer to ensure at all tim isposal are properly operated a Classification: ational Purposes O r and Sewer to properly report oring period. Classification: Class	investigation v in which the vation basin cause Minor mly TAC 319.11-319. Minor mly nes that all system nd maintained. Minor monitoring results Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter Description: 13 Date: 07/31/2017 (1444140)Classification: Moderate For Informational Purposes Only Self Report? YES 2D TWC Chapter 26, SubChapter A 26.121(a) Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter 14 08/31/2017 (1456604)Date: Classification: Moderate For Informational Purposes Only Self Report? YES 2D TWC Chapter 26, SubChapter A 26.121(a) Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter 15 Date: 12/08/2017 (1454469)Classification: Moderate For Informational Purposes Only Self Report? NO Citation: PC 2(g) PERMIT Failure by North Orange Water & Sewer, LLC to prevent the discharge of Description: wastewater into or adjacent to water of the state at any location not permitted as an outfall. 05/23/2018 (1482872)16 Date: Classification: Minor For Informational Purposes Only Self Report? NO 30 TAC Chapter 290, SubChapter D 290.46(v) Citation: Failure by the Longford Place Water System to maintain all electrical wiring Description: securely installed in compliance with a local or national electrical code. Classification: Minor For Informational Purposes Only Self Report? NO 30 TAC Chapter 290, SubChapter D 290.46(m) Citation: Failure by the Longford Place Water System to maintain the well pump for well no. Description: 2 in a good, working condition. Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 290, SubChapter D 290.44(h)(1)(B)(i) Citation: Failure by Longford Place to maintain an adequate internal cross-connection Description: control program which includes an annual inspection and testing by a licensed backflow prevention assembly tester on all backflow prevention assemblies used for health hazard protection. Classification: Minor For Informational Purposes Only Self Report? NO 30 TAC Chapter 290, SubChapter D 290.42(f)(1)(B) Citation: Failure by Longford Place to maintain a day tank to minimize the possibility of Description: severely overfeeding liquid chemicals from bulk storage facilities. Classification: Minor For Informational Purposes Only NO Self Report? 30 TAC Chapter 290, SubChapter D 290.42(f)(1)(E)(ii) Citation: Failure by Longford Place to maintain adequate containment facilities for all liquid Description: chemical storage tanks. Classification: Minor For Informational Purposes Only Self Report? NO 30 TAC Chapter 290, SubChapter D 290.46(m) Citation: Failure by Longford Place to ensure good maintenance and housekeeping Description: practices used by a public water system shall ensure the good working condition and general appearance of the system's facilities and equipment. Classification: Minor For Informational Purposes Only Self Report? NO 30 TAC Chapter 290, SubChapter D 290.46(m) Citation:

* NOVs applicable for the Compliance History rating period 9/1/2014 to 8/31/2019

Appendix B All Investigations Conducted During Component Period May 06, 2015 and May 06, 2020

		(1262873)
Item 1*	May 27, 2015**	For Informational Purposes Only
		(1270037)
Item 2*	June 25, 2015**	For Informational Purposes Only
T. 0.4		(1277566) For Informational Durposos Only
Item 3*	July 29, 2015**	For Informational Purposes Only
Item 4*	August 25, 2015**	⁽¹²⁸³⁷⁴⁴⁾ For Informational Purposes Only
Item 4	August 23, 2013	(1274823)
Item 5	September 17, 2015*	*For Informational Purposes Only
		(1290902)
Item 6*	October 01, 2015**	For Informational Purposes Only
		(1302540)
Item 7	December 01, 2015**	For Informational Purposes Only
		(1316276)
Item 8*	January 06, 2016**	For Informational Purposes Only
		(1309484)
Item 9*	January 07, 2016**	For Informational Purposes Only
		(1322621)
Item 10	March 31, 2016**	For Informational Purposes Only
Item 11	April 06, 2016**	(1323132) For Informational Purposes Only
Item II	April 06, 2016	(1339535)
Item 12	April 15, 2016**	For Informational Purposes Only
		(1346353)
Item 13	June 24, 2016**	For Informational Purposes Only
		(1346354)
Item 14	June 30, 2016**	For Informational Purposes Only
		(1359754)
Item 15*	July 21, 2016**	For Informational Purposes Only
		(1351087)
Item 16	September 13, 2016*	*For Informational Purposes Only
T 1 A A A A		(1372874) *For Informational Purposes Only
Item 17*	September 15, 2016*	*For Informational Purposes Only
Item 18*	Sentember 22 2016*	(1366189) *For Informational Purposes Only
1011 10	September 22, 2010	(1379060)
Item 19*	October 20, 2016**	For Informational Purposes Only

		(1369888)
Item 20	October 21, 2016**	For Informational Purposes Only
Item 21	November 21, 2016**	(1385015) For Informational Purposes Only
Item 22*	December 21, 2016**	(1391143) For Informational Purposes Only
Item 23*	February 09, 2017**	(1397770) For Informational Purposes Only
Item 24*	March 10, 2017**	(1411748) For Informational Purposes Only
Item 25*	April 07, 2017**	⁽¹⁴¹⁸²⁴⁹⁾ For Informational Purposes Only
Item 26	April 17, 2017**	(1396338) For Informational Purposes Only
Item 27	May 09, 2017**	⁽¹⁴²⁵⁸³⁹⁾ For Informational Purposes Only
Item 28	May 15, 2017**	(1410921) For Informational Purposes Only
Item 29*	June 09, 2017**	(1431889) For Informational Purposes Only
Item 30*	July 12, 2017**	⁽¹⁴⁴⁰⁴⁶⁰⁾ For Informational Purposes Only
Item 31	August 04, 2017**	(1444140) For Informational Purposes Only
Item 32*	October 09, 2017**	(1456605) For Informational Purposes Only
Item 33*	November 27, 2017**	(1462069) For Informational Purposes Only
Item 34	December 04, 2017**	(1456604) For Informational Purposes Only
Item 35*	December 12, 2017**	(1468453) For Informational Purposes Only
Item 36*	January 12, 2018**	⁽¹⁴⁷⁵¹⁵⁰⁾ For Informational Purposes Only
Item 37	January 19, 2018**	(1464705) For Informational Purposes Only
Item 38*	February 09, 2018**	(1487364) For Informational Purposes Only
Item 39*	March 09, 2018**	⁽¹⁴⁹¹⁰³⁹⁾ For Informational Purposes Only
Item 40*	April 09, 2018**	⁽¹⁴⁹⁴²⁸⁹⁾ For Informational Purposes Only

		(1501238)	Durrance Only
Item 41*	May 08, 2018**	For Informational (1482872)	Purposes Only
Item 42	May 23, 2018**	For Informational	Purposes Only
Item 43*	June 08, 2018**	⁽¹⁵⁰⁸³²²⁾ For Informational	Purposes Only
Item 44*	June 11, 2018**	⁽¹⁴⁹⁰¹⁹⁸⁾ For Informational	Purposes Only
Item 45*	July 09, 2018**	(1514655) For Informational	Purposes Only
Item 46*	September 13, 2018*	(1520710) *For Informational	Purposes Only
Item 47*	October 09, 2018**	(1534236) For Informational	Purposes Only
Item 48*	November 13, 2018**	(1542071) For Informational	Purposes Only
Item 49*	December 18, 2018**	(1545841) For Informational	Purposes Only
Item 50	December 20, 2018**	(1524301) For Informational	Purposes Only
Item 51*	January 07, 2019**	(1561537) For Informational	Purposes Only
Item 52*	February 07, 2019**	(1561535) For Informational	Purposes Only
Item 53*	March 19, 2019**	(1561536) For Informational	Purposes Only
Item 54	April 10, 2019**	(1552471) For Informational	Purposes Only
Item 55*	May 09, 2019**	(1584490) For Informational	Purposes Only
Item 56*	June 11, 2019**	(1584491) For Informational	Purposes Only
Item 57*	July 16, 2019**	(1593778) For Informational	Purposes Only
Item 58*	August 29, 2019**	(1600106) For Informational	Purposes Only
Item 59*	September 10, 2019	(1607007) For Informational	Purposes Only
Item 60*	October 08, 2019	(1613854) For Informational	Purposes Only
Item 61*	November 07, 2019	(1619666) For Informational	Purposes Only
		(1627032)	

Item 62*	December 05, 2019	For Informational Purposes Only
Item 63*	January 09, 2020	(1634659) For Informational Purposes Only
Item 64*	February 11, 2020	(1641273) For Informational Purposes Only
Item 65*	March 06, 2020	(1626257) For Informational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2014 and 08/31/2019.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING NORTH ORANGE WATER & SEWER, LLC RN102078136 AND RN102078896 **BEFORE THE**

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2019-1559-MWD-E

On ______, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding North Orange Water & Sewer, LLC (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

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

I. FINDINGS OF FACT

- 1. The Respondent owns and operates wastewater treatment facilities and associated collection systems located immediately west of State Highway 87, approximately 4.5 miles north of the intersection of State Highway 87 and Interstate Highway 10 and approximately 6.9 miles north of the business district of the City of Orange, Orange County, Texas ("Facility No. 1"); and at 6602 Lancaster Drive in Orange County, Texas ("Facility No. 2"). Facility Nos. 1 and 2 (the "Facilities") are near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
- 2. During an investigation conducted on January 30, 2019 and January 31, 2019, an investigator documented at Facility No. 1 that:
 - a. Corrosion and delamination were observed throughout the three aeration basins, both chlorine contact chambers, and the sludge digester;

- b. Rust and corrosion were observed above the water line in the clarifier;
- c. A sludge return pipe to an aeration basin was perfusing at a pipe joint onto the catwalk;
- d. Excessive algae, surface scum, and duckweed were observed throughout the clarifier;
- e. There was uneven flow over the clarifier weir teeth;
- f. The rubber skimmer was not meeting the clarifier scum ring;
- g. The ventilation fan in the chlorine closet was broken;
- h. The above-ground chlorine contact chamber contained one foot of sludge out of a total water depth of seven feet and the ground-level chlorine contact chamber contained one foot of sludge out of a total water depth of three feet;
- i. Duckweed, foam, and algae were present in both chlorine contact chambers;
- j. A hole in the concrete foundation of the influent lift station was observed, and the visual alarm was inoperable;
- k. The Tennyson lift station wet well was covered with floating solids and plastics, and the audio alarm was inoperable;
- l. The Respondent was not recording the proper values for the chlorine secondary standards in the daily operator log book;
- m. The Respondent did not have proper process controls and did not have a solids management plan ("SMP") to operate the contact stabilization plant within ranges common to accepted industry standards which resulted in plastics and sludge discharging from the outfall and accumulating in the receiving stream for approximately 100 yards downstream;
- n. The pH buffer solutions, the sodium arsenite used for the manganese correction, and the secondary standards for chlorine had expired;
- o. The Respondent was using an unmarked squirt bottle of sodium arsenite to conduct manganese corrections on total chlorine residual analyses;
- p. The Respondent was not properly conducting the manganese correction to calculate the total chlorine residual analysis; and
- q. The Respondent did not prevent the unauthorized discharges of sewage wastewater into or adjacent to any water in the state, as shown in the Unauthorized Discharge Table below:

Date	Amount Discharged (gallons)	Description	Corrective Action
August 9, 2017	Unknown	Sewage overflow from a cleanout at 8505 Shakespeare into a yard.	The main line was cleaned and cleared of any debris. The area was cleaned and disinfected.
September 13, 2018	500	Broken line at Tennyson Lift Station.	The line was replaced. The area was cleaned and disinfected.

- 3. During an investigation conducted on February 14, 2019, an investigator documented at Facility No. 2 that:
 - a. The Respondent failed to submit noncompliance forms with all the required information. Incident No. 302775 did not contain a start time or end time, Incident No. 304935 did not contain a start time, end time, or location of the discharge, and Incident No. 390396 did not contain the location of the discharge or the time the discharged ceased;
 - b. The influent lift station had a vertical gap in the fence, and a gap at the base of the fence;
 - c. The chlorine contact chamber contained one foot of sludge in a total water depth of three feet;
 - d. The two clarifiers had rising sludge and excessive surface scum;
 - e. Sample results for total chlorine residual, flow, and nitrogen on the August 2017 discharge monitoring report ("DMR") and nitrogen on the September 2017 DMR were incorrectly reported as zero;
 - f. Both clarifiers were corroded;
 - g. Rust and corrosion were observed throughout the aeration basin, the bar screen area, and the chlorine contact chamber;
 - h. The DMR for *Escherichia coli* ("*E. coli*") for the monitoring period ending on December 31, 2017 was not submitted by the 20th day of the following month;
 - i. The Respondent was not recording accurate values for the colorimeter secondary standards being used, the log sheets were inconsistent since the previous July 6,

2017 investigation, and the Respondent was recording standard values from an expired set of standards or not recording standard values at all;

- j. The 2017 and 2018 annual sludge reports ("ASRs") were not submitted to the TCEQ Beaumont Regional Office; and
- k. The Respondent did not prevent the unauthorized discharges of sewage wastewater into or adjacent to any water in the state, as shown in the Unauthorized Discharge Table below:

Date	Amount Discharged (gallons)	Description	Corrective Action
May 14, 2017	200	Sewage overflow from a manhole into a ditch at 25 Stratford Drive.	The manhole and line were cleaned and cleared of any debris. The area was cleaned and disinfected.
May 21, 2018	500	Sewage overflowed into a house at 11 Medford Drive due to a stoppage in the main trunk line.	The main line was jetted. The area was cleaned and disinfected.
May 21, 2018	500	Sewage overflow into a ditch due to a stoppage in the main trunk line.	The main line was jetted. The area was cleaned and disinfected.
January 24, 2019	500	Sewage overflow at 6906 Lancaster Drive due to a stoppage in the main trunk line.	The main line was jetted. The area was cleaned and disinfected.

- 4. The Executive Director recognizes that the Respondent has implemented the following corrective measures at Facility No. 1:
 - a. Ceased the unauthorized discharges, and cleaned and disinfected the affected areas by September 13, 2018;
 - b. Purchased pH buffer solutions, sodium arsenite, and secondary standards for chlorine by February 14, 2019;
 - c. Replaced the ventilation fan in the chlorine closet by August 7, 2019;

- d. Repaired the concrete foundation at the influent lift station by August 7, 2019;
- e. Repaired the Tennyson lift station audio alarm by August 7, 2019; and
- f. Removed the floating solids from the Tennyson lift station wet well by August 7, 2019.
- 5. The Executive Director recognizes that the Respondent has implemented the following corrective measures at Facility No. 2:
 - a. Ceased the unauthorized discharges, and cleaned and disinfected the affected areas by January 24, 2019;
 - b. Submitted updated DMRs to reflect the actual sample results for August 2017 and September 2017 by March 26, 2019; and
 - c. Submitted the missing DMR for *E. coli* sample results for the monitoring period ending on December 31, 2017 by April 18, 2019.

II. CONCLUSIONS OF LAW

- 1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE ch. 26 and the rules of the TCEQ.
- 2. As evidenced by Finding of Fact Nos. 2.a and 2.b, the Respondent failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0011589001, Operational Requirements No. 1.
- 3. As evidenced by Finding of Fact No. 2.c, the Respondent failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1.
- 4. As evidenced by Finding of Fact Nos. 2.d through 2.i, the Respondent failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1.
- 5. As evidenced by Finding of Fact Nos. 2.j and 2.k, the Respondent failed to ensure Facility No. 1 and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and (5) and 317.3(e)(5), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1.
- 6. As evidenced by Finding of Fact No. 2.1, the Respondent failed to maintain monitoring and reporting records at Facility No. 1, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1)

and (11)(C) and 319.7(a), and TPDES Permit No. WQ0011589001, Monitoring and Reporting Requirements No. 3.c.vi.

- 7. As evidenced by Finding of Fact No. 2.m, the Respondent failed to take all reasonable steps to minimize or prevent any discharge or sludge use or disposal or other permit violation that has a reasonable likelihood of adversely affecting human health or the environment, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (4), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011589001, Operational Requirements No. 1 and Permit Conditions No. 2.d.
- 8. As evidenced by Finding of Fact Nos. 2.n through 2.p, the Respondent failed to comply with recommended sampling and testing methods, in violation of 30 TEX. ADMIN. CODE § 319.11.
- 9. As evidenced by Finding of Fact No. 2.q, the Respondent failed to prevent an unauthorized discharge of sewage wastewater into or adjacent to any water in the state, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011589001, Permit Conditions No. 2.g.
- 10. As evidenced by Finding of Fact No. 3.a, the Respondent failed to fully report an unauthorized discharge in writing to the Regional Office within five working days of becoming aware of the noncompliance, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (9)(A) and TPDES Permit No. WQ0011155001, Monitoring and Reporting Requirements No. 7.a.
- 11. As evidenced by Finding of Fact No. 3.b, the Respondent failed to secure the lift stations in an intruder-resistant manner, in violation of 30 TEX. ADMIN. CODE § 317.3(a).
- 12. As evidenced by Finding of Fact Nos. 3.c and 3.d, the Respondent failed to ensure Facility No. 2 and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5) and TPDES Permit No. WQ0011155001, Operational Requirements No. 1.
- 13. As evidenced by Finding of Fact No. 3.e, the Respondent failed to accurately report monitoring activities, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (12) and TPDES Permit No. WQ0011155001, Permit Conditions No. 1.a.
- 14. As evidenced by Finding of Fact No. 3.f, the Respondent failed to ensure Facility No. 2 and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), and TPDES Permit No. WQ0011155001, Operational Requirements No. 1, and TCEQ Agreed Order Docket No. 2015-0604-MWD-E, Ordering Provision No. 2.a.ii.
- 15. As evidenced by Finding of Fact No. 3.g, the Respondent failed to ensure Facility No. 2 and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), and TPDES Permit No. WQ0011155001, Operational Requirements No. 1.

- 16. As evidenced by Finding of Fact No. 3.h, the Respondent failed to timely submit monitoring results at intervals specified in the permit, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (17), and TPDES Permit No. WQ0011155001, Monitoring and Reporting Requirements No. 1.
- 17. As evidenced by Finding of Fact No. 3.i, the Respondent failed to maintain monitoring and reporting records at Facility No. 2, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and (11)(C), 319.6, and 319.7(a), and TPDES Permit No. WQ0011155001, Monitoring and Reporting Requirements No. 3.c.vi.
- 18. As evidenced by Finding of Fact No. 3.j, the Respondent failed to submit an ASR to the TCEQ by September 30th of each year, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and TPDES Permit No. WQ0011155001, Section IV.C.
- 19. As evidenced by Finding of Fact No. 3.k, the Respondent failed to prevent unauthorized discharges of sewage wastewater into or adjacent to any water in the state, in violation of 30 TEX. ADMIN. CODE § 305.125(1) and (5), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0011155001, Permit Conditions No. 2.g.
- 20. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 21. An administrative penalty in the amount of \$98,176 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Revenue Operations Section of TCEQ's Financial Administration Division reviewed financial documentation submitted by the Respondent and determined that the Respondent is unable to pay all or part of the penalty. Therefore, \$94,576 of the penalty is deferred contingent upon the Respondent's compliance with all the terms of this Order and shall be waived only upon full compliance with all of the terms and conditions in this Order. If the Respondent fails to comply with any requirement of this Order, including any payment schedule, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

The Respondent paid \$100 of the undeferred penalty. The remaining amount of \$3,500 of the undeferred penalty shall be paid in 35 monthly payments of \$100 each. 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 the Respondent fails to comply with the payment requirements of this Order, including the payment schedule, the Executive Director may accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. The Respondent's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms and conditions of this Order and the Executive Director may demand payment of all or part of the deferred penalty.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 21 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: North Orange Water & Sewer, LLC, Docket No. 2019-1559-MWD-E" to:

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

- 2. The Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. At Facility No. 1:
 - (1) Repair the sludge return pipe;
 - (2) Repair/replace the rubber skimmer to ensure it meets the clarifier scum ring;
 - (3) Ensure even flow over the clarifier weir teeth;
 - (4) Remove excess algae, surface scum, and duckweed from the clarifier;
 - (5) Remove and properly dispose of sludge, duckweed, foam, and algae from both chlorine contact chambers;
 - (6) Repair the influent lift station visual alarm;
 - (7) Develop and implement a SMP at the Facility;
 - (8) Implement procedures and conduct employee training to ensure proper values for the chlorine secondary standards are recorded in the daily operator log book;

- (9) Implement procedures and conduct employee training to properly conduct the manganese correction to calculate total chlorine residual; and
- (10) Label the unmarked squirt bottle of sodium arsenite.
- ii. At Facility No. 2:
 - (1) Implement procedures and conduct employee training to ensure noncompliance notifications are submitted complete;
 - (2) Make repairs to the vertical gap in the fence and the gap at the base of the fence to secure the influent lift station;
 - (3) Remove and properly dispose of sludge from the chlorine contact chamber;
 - (4) Remove and properly dispose of sludge and surface scum from both clarifiers;
 - (5) Implement procedures and conduct employee training to ensure that the colorimeter secondary standard accuracy checks are accurately recorded to include standard values, and to ensure that secondary standards are unexpired; and
 - (6) Submit the ASRs for the years 2017 and 2018 to the TCEQ Beaumont Regional Office.
- b. Within 45 days after the effective date of this Order, submit written certification of compliance with Ordering Provision Nos. 2.a.i through 2.a.ii, in accordance with Ordering Provision No. 2.f below.
- c. Within 60 days after the effective date of this Order, remove and properly dispose of plastics and sludge accumulation in the receiving stream at Facility No. 1.
- d. Within 75 days after the effective date of this Order, submit written certification of compliance with Ordering Provision No. 2.c, in accordance with Ordering Provision No. 2.f below.
- e. Within 90 days after the effective date of this Order:
 - i. At Facility No. 1, remove the rust/delamination and repaint the three aeration basins, both chlorine contact chambers, the sludge digester, and the clarifier; and
 - ii. At Facility No. 2, remove the rust/corrosion and repaint the bar screen area, both clarifiers, the aeration basin, and the chlorine contact chamber.

> f. Within 105 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.e.i and 2.e.ii. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

Water Section Manager Beaumont Regional Office Texas Commission on Environmental Quality 3870 Eastex Freeway Beaumont, Texas 77703-1830

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facilities operations referenced in this Order.
- 5. If the 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, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and

substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.

- 7. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
- 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 10. 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.
- 11. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date	
Curth	3/7/2022	
For the Executive Director	Date	

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the 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, any falsification of any compliance documents may result in criminal prosecution.

Suford MOONEY

Name (Printed or typed) Authorized Representative of North Orange Water & Sewer, LLC

Date

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