Order Type:

Findings Agreed Order

Findings Order Justification:

Indifference to legal duty based on violation of a previous order.

Media:

PWS

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Tri County Point Water System 3, 14 County Road 480, Palacios, Jackson County; Tri County Point Water System 4, located approximately 936 feet east of Porpoise Drive on Sea Horse Drive near Palacios, Jackson County

Type of Operation:

Public water supply

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: August 6, 2021

Comments Received: No

Penalty Information

Total Penalty Assessed: \$53,873

Amount Deferred for Financial Inability to Pay: \$50,273

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 - N/A

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: December 3, 2019 through December 18, 2019

Date(s) of NOE(s): February 7, 2020

Violation Information

- 1. Failed to provide a total storage capacity of 200 gallons per connection [30 Tex. Admin. Code § 290.45(b)(1)(C)(ii), Tex. Health & Safety Code § 341.0315(c) and TCEQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.c.ii].
- 2. Failed to provide two or more service pumps having a total capacity of 2.0 gallons per minute ("gpm") per connection at each pump station or pressure plane [30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(iii), Tex. Health & Safety Code § 341.0315(c) and TCEQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.c.i].
- 3. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request [30 Tex. Admin. Code § 290.46(f)(2), (f)(3)(A)(iv), (f)(3)(B)(v), (f)(3)(D)(ii), and (f)(3)(E)(iv) and TCEQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.a.i].
- 4. Failed to complete a Customer Service Inspection ("CSI") certificate prior to providing continuous water service to new construction or any existing service when the water purveyor has reason to believe cross-connections or other potential contamination hazards exists [30 Tex. Admin. Code § 290.46(j)].
- 5. Failed to adopt an adequate plumbing ordinance, regulations, or service agreements with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted [30 Tex. Admin. Code § 290.46(i)].
- 6. Failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies [30 Tex. ADMIN. CODE § 290.46(n)(2)].
- 7. Failed to ensure additional protection was provided at all residences or establishments where an actual or potential contamination hazard exists in the form of an air gap or backflow prevention assembly, as identified in 30 Tex. Admin. Code § 290.47(f) [30 Tex. Admin. Code § 290.44(h)(1)(A)].

- 8. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request [30 Tex. Admin. Code \S 290.46(f)(2), (f)(3)(A)(iv), (f)(3)(B)(v), and (f)(3)(D)(ii)].
- 9. Failed to complete a CSI certificate prior to providing continuous water service to new construction or any existing service when the water purveyor has reason to believe cross-connections or other potential contamination hazards exists [30 Tex. Admin. Code § 290.46(j)].
- 10. Failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies [30 Tex. ADMIN. CODE \S 290.46(n)(2)].
- 11. Failed to provide a total storage capacity of 200 gallons per connection [30 Tex. Admin. Code § 290.45(b)(1)(C)(ii) and Tex. Health & Safety Code § 341.0315(c)].
- 12. Failed to provide two or more service pumps having a total capacity of 2.0 gpm per connection at each pump station or pressure plane [30 Tex. Admin. Code § 290.45(b)(1)(C)(iii) and Tex. Health & Safety Code § 341.0315(c)].
- 13. Failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connection nor other unacceptable plumbing practices are permitted [30 Tex. Admin. Code § 290.46(i)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

On December 18, 2019 the Respondent disconnected and removed the hose and capped the potable waterline at the System 3 wastewater treatment plant.

Technical Requirements:

The Order will require the Respondent to:

- 1. The Respondent shall undertake the following technical requirements at System 3:
- a. Within 30 days:
- i. Compile and maintain properly completed water works operation and maintenance records, including records for the dates that dead-end mains were flushed, backflow prevention device programs, results of inspections for all pressure maintenance facilities and copies of the CSI reports;

- ii. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies; and
- iii. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that CSI certificates are completed prior to providing continuous water service to new construction, on any existing service either when the water purveyor has reason to believe that cross-connections or other potential contaminant hazards exist, or after any material improvements, corrections, or additions to the private water distribution facilities.
- b. Within 45 days, submit written certification to demonstrate compliance with a.
- c. Within 90 days:
- i. Complete CSI certificates for all existing locations at which the water purveyor has reason to believe cross-connections or other potential contamination hazards exist; and
- ii. Adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted.
- d. Within 105 days, submit written certification to demonstrate compliance with c.
- e. Within 180 days:
- i. Provide a total storage capacity of at least 200 gallons per connection; and
- ii. Provide two or more service pumps having a total capacity of at least 2.0 gpm per connection.
- f. Within 195 days, submit written certification to demonstrate compliance with e.
- 2. The Respondent shall undertake the following technical requirements at System 4:
- a. Within 30 days:
- i. Compile and maintain properly completed water works operation and maintenance records, including records for the dates that dead-end mains were flushed, backflow prevention device programs and the results of inspections for all pressure maintenance facilities;

- ii. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies; and
- iii. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that CSI certificates are completed prior to providing continuous water service to new construction, on any existing service either when the water purveyor has reason to believe that cross-connections or other potential contaminant hazards exist, or after any material improvements, corrections, or additions to the private water distribution facilities.
- b. Within 45 days, submit written certification to demonstrate compliance with a.
- c. Within 90 days:
- i. Complete CSI certificates for all existing locations at which the water purveyor has reason to believe cross-connections or other potential contamination hazards exist; and
- ii. Adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted.
- d. Within 105 days, submit written certification to demonstrate compliance with c.
- e. Within 180 days:
- i. Provide a total storage capacity of at least 200 gallons per connection; and
- ii. Provide two or more service pumps having a total capacity of at least 2.0 gpm per connection.
- f. Within 195 days, submit written certification to demonstrate compliance with e.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Aaron Vincent, Enforcement Division,

Enforcement Team 2, MC 219, (512) 239-0855; Michael Parrish, Enforcement Division,

MC 219, (512) 239-2548

Respondent: Cynthia Morrison, President of the Board of Directors, TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION, 14 County Road 480, Palacios, Texas 77465

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

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

EC's Team Enforcement Team 2

DATES Assianed 2-Mar-2020

Screening 4-Mar-2020 PCW 4-Mar-2020 **EPA Due**

RESPONDENT/FACILITY INFORMATION

Respondent TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION (Tri County Point Water System 3)

Reg. Ent. Ref. No. RN101398733

Major/Minor Source Minor Facility/Site Region 14-Corpus Christi

CASE INFORMATION

Enf./Case ID No. 49546 No. of Violations 2 Docket No. 2020-0376-PWS-E Order Type Findings Media Program(s) Public Water Supply Government/Non-Profit Yes **Enf. Coordinator Aaron Vincent**

Multi-Media

Maximum \$1,000

Admin. Penalty \$ Limit Minimum Penalty Calculation Section TOTAL BASE PENALTY (Sum of violation base penalties) Subtotal 1 \$15,600 ADJUSTMENTS (+/-) TO SUBTOTAL 1
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. **Compliance History 70.0%** Adjustment Subtotals 2, 3, & 7 \$10,920 Enhancement for one agreed order containing a denial of liability and two agreed orders without a denial of liability Culpability Subtotal 4 No \$0 0.0% Enhancement The Respondent does not meet the culpability criteria. Notes **Good Faith Effort to Comply Total Adjustments** Subtotal 5 \$0 Subtotal 6 **Economic Benefit** 0.0% Enhancement* \$0 Capped at the Total EB \$ Amount Total EB Amounts \$28,172 Estimated Cost of Compliance SUM OF SUBTOTALS 1-7 Final Subtotal \$26,520 OTHER FACTORS AS JUSTICE MAY REQUIRE \$0 0.0% Adjustment Reduces or enhances the Final Subtotal by the indicated percentage. Notes Final Penalty Amount \$26,520 STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty \$26,520 **DEFERRAL** 0.0% Reduction Adiustment \$0 Reduces the Final Assessed Penalty by the indicated percentage No deferral is recommended for Findings Orders. Notes **PAYABLE PENALTY** \$26,520 Screening Date 4-Mar-2020

Docket No. 2020-0376-PWS-E

Respondent TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION (Tri County Point Water System 3)

Case ID No. 49546

Reg. Ent. Reference No. RN101398733

Media Public Water Supply

Enf. Coordinator Aaron Vincent

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

Compliance History Worksheet

>>	Compliance History Site	Enhancement (Subtotal 2)
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Component	Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	2	50%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
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 (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
	Environmental management quatema in place for any year or are-	Ne	00/
	Environmental management systems in place for one year or more	No	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%
2 3	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2)

Repeat Violator (Subtotal 3)

N/A Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7)

>> Compliance History Summary

Compliance History Notes

Enhancement for one agreed order containing a denial of liability and two agreed orders without a denial of liability.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

	Scre	ening Date	4-Mar-2020			ket No. 2020-0376-PWS-E	PCW
	R	Respondent	TRI-COUNTY Point Water Sy	OINT PROPER	TY OWNERS AS	SSOCIATION (Tri County	
				stem 3)			Policy Revision 4 (April 2014)
_	_	ase ID No.					PCW Revision March 26, 2014
Reg.	Ent. Ref		RN101398733				
	Enf C		Public Water S	uppiy			
		ation Number	Aaron Vincent	ī			
	VIOI		20 T	durin Code C	200 45(5)(1)(CO(") Tour Health & Cafety Code C	
		Rule Cite(s)				C)(ii), Tex. Health & Safety Code §	20
			341.U313(C)	and ICEQ Ag	Provision N	ocket No. 2014-1590-PWS-E, Orderii	ig
					11001310111	VO. 2.C.II	
				•		city of 200 gallons per connection.	
	Violatio	n Description		•		ons requiring a total storage capacity ovided, indicating a 100% deficiency	
			29,000 gai	ions. However	i, none was pro	ovided, indicating a 100 % dentiency	•
						Page Page	¢1 000
						Base Per	s1,000
>> Env	vironme	ntal. Propei	rty and Hum	an Health	Matrix		
		,	,	Harm			
		Release	Major	Moderate	Minor		
OR		Actual				_	
		Potential	Х			Percent 15.0%	
> > D#0	a 2 2 22 22 22 2	tic Matrix					
>>PF0	gramma	tic Matrix Falsification	Major	Moderate	Minor		
		raisineation	rajor	Hoderate	7 111101	Percent 0.0%	
	Matrix					oose persons served by the Facility t	0
	Notes	cor	itaminants that	would exceed	i levels that are	e protective of human health.	
						Adjustment	\$850
							\$150
							Ψ130
Violati	on Event	ts					
					a (=		
		Number of \	/iolation Events	52]	1577 Number of violation days	
			dailu		1		
			daily weekly				
			monthly	Х	1		
			quarterly	^	1	Violation Base Per	nalty \$7,800
			semiannual		1		
			annual				
			single event				
						from the effective date of TCEQ Agre	
		Order Docker	I NO. 2014-1590	J-PWS-E, May	31, 2015, to th	e end date of the PCW revision, Aug	ust
					31, 2013.		
Good F	aith Effo	orts to Com	ply	0.0%		Reduc	ction \$0
			E	Before NOE/NOV	NOE/NOV to EDF	PRP/Settlement Offer	
			Extraordinary				
			Ordinary				
			N/A	X	<u> </u>		
				The Respond	lent does not m	neet the good faith criteria for	
			Notes	·		iolation.	
						Violation Sub	total \$7,800
							Ψ,,000
Econor	mic Bene	efit (EB) for	this violation	on		Statutory Limit Tes	t
		Estimate	ed EB Amount		\$26,080	Violation Final Penalty 1	fotal \$13,260
							1 - 7 - 0 - 0
				This viol	ation Final As	ssessed Penalty (adjusted for lin	nits) \$13,260

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	POINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	: Water System 3)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101398733						
Media	Public Water S					Percent Interest	Years of
Violation No.	1						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$62,350	7-May-2015	26-Apr-2021	5.98	\$1,242	\$24,838	\$26,080
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a	\$0 \$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to provide a total storage capacity of at least 200 gallons						
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	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				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$62,350			TOTAL		\$26,080

Respondent Case ID No. Reg. Ent. Reference	4-Mar-2020	Docket No. 2020-0376-PWS-E	PCW
Case ID No. Reg. Ent. Reference No.		NT PROPERTY OWNERS ASSOCIATION (Tri County Point	
Reg. Ent. Reference No.	water System 3)	Po	licy Revision 4 (April 2014)
		PC	W Revision March 26, 2014
	Public Water Supp	ply	
Enf. Coordinator			
Violation Number			_
Rule Cite(s)	30 Tex. Adr	min. Code § 290.45(b)(1)(C)(iii), Tex. Health & Safety Code §	
	341.0315(c) a	nd TCEQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.c.i	
Violation Description	per minute (' Specifically, the	e two or more service pumps having a total capacity of 2.0 gallon 'gpm") per connection at each pump station or pressure plane. Facility had 145 connections requiring a service pump capacity o er, no service pumps were provided, indicating a 100% deficience	f
		Base Penal	\$1,000
>> Environmental, Prope	rty and Huma		
	N4 - 4	Harm Madagata Minaga	
OR Release		Moderate Minor	
OR Actua Potentia		Percent 15.0%	
Foteritia	X	Percent 15.0%	
>>Programmatic Matrix			
Falsification	Major	Moderate Minor	
		Percent 0.0%	
·	•	vice pump capacity could expose persons served by the Facility to ould exceed levels that are protective of human health.	
		Adjustment \$8.	50
			\$150
			\$150
Violation Events			
	_		
Number of	Violation Events	52 1577 Number of violation days	
	daily		
	weekly		
	monthly quarterly	X	
		Violation Race Denal	tv ¢7,800
		Violation Base Penal	ty \$7,800
	semiannual	Violation Base Penal	ty \$7,800
		Violation Base Penal	ty \$7,800
	semiannual annual	Violation Base Penal	\$7,800
	semiannual annual single event onthly events are i	recommended, calculated from the effective date of TCEQ Agreed	
	semiannual annual single event onthly events are i	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3	
	semiannual annual single event onthly events are i	recommended, calculated from the effective date of TCEQ Agreed	
Order Docket	semiannual annual single event onthly events are not 2014-1590-PW	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019.	1,
· · · · · · · · · · · · · · · · · · ·	semiannual annual single event conthly events are not 2014-1590-PW	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3	1,
Order Docket	semiannual annual single event conthly events are not 2014-1590-PW	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019.	1,
Order Docket	semiannual annual single event conthly events are not 2014-1590-PV	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019.	1,
Order Docket	semiannual annual single event conthly events are not not 2014-1590-PW	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019.	1,
Order Docket	semiannual annual single event onthly events are not 2014-1590-PV	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019. O.0% Reduction OF NOE/NOV NOE/NOV to EDPRP/Settlement Offer	1,
Order Docket	semiannual annual single event conthly events are reported by the series of the series	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019. Reduction one NOE/NOV NOE/NOV to EDPRP/Settlement Offer X he Respondent does not meet the good faith criteria for	1, on \$0
Good Faith Efforts to Com	semiannual annual single event onthly events are reported by a series of the series of	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019. Reduction one NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Subtote	1, on \$0
Order Docket	semiannual annual single event onthly events are reported by a series of the series of	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019. Reduction one NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Subtote	51, on \$0
Good Faith Efforts to Com Economic Benefit (EB) for	semiannual annual single event onthly events are reported by a series of the series of	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019. Reduction one NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Subtote	\$0 \$7,800
Good Faith Efforts to Com Economic Benefit (EB) for	semiannual annual single event conthly events are reported by the series of the series	recommended, calculated from the effective date of TCEQ Agreed VS-E, May 7, 2015, to the end date of the PCW revision, August 3 2019. Reduction One NOE/NOV NOE/NOV to EDPRP/Settlement Offer X he Respondent does not meet the good faith criteria for this violation. Violation Subtot Statutory Limit Test	\$0 \$7,800 al \$13,260

Economic Benefit Worksheet							
Respondent	TRI-COUNTY F	OINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	t Water System 3)	
Case ID No.					,	, ,	
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		арріу				Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs							
Equipment	\$5,000	7-May-2015	26-Apr-2021	5.98	\$100	\$1,992	\$2,092
Buildings	70,000			0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	•					service pumps with	• • •
Notes for DELAYED costs	of at least	J	,			e of TCEQ Agreed O	rder Docket
		No. 201	4-1590-PWS-E	to the e	estimated date of o	compliance.	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Notes for Avoided costs							
_							
Approx. Cost of Compliance		\$5,000			TOTAL		\$2,092
		7-,500					τ-/



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014) PCW Revision September 1, 2019

DATES

PAYABLE PENALTY

Assigned 2-Mar-2020

	PCW	4-Mar-2020	Screening	4-Mar-2020	EPA Due			
DECDO	NIDENIT /EACH I	TV INICODMATI	ON					
RESPU		TY INFORMATI TRI-COUNTY PO		V OWNEDS ASS	COCLATION (Tx	County Daint	Water Cretem 2	<u> </u>
Rec	g. Ent. Ref. No.	RN101398733	INI PROPERI	Y UWINERS ASS	SOCIATION (III	County Point	water System 3)
		14-Corpus Chris	ti		Major/I	Minor Source	Minor	
	.y. c.ic itog.c.i							
CASE II	NFORMATION							
En	f./Case ID No.				No.	of Violations		
		2020-0376-PWS				Order Type		
Med		Public Water Su	pply			t/Non-Profit		
	Multi-Media				Enf.		Aaron Vincent	
	B		ΦΕΟ.		* F 222	EC's Team	Enforcement Te	eam 2
Adr	nin. Penalty \$ I	_imit iviinimum	\$50	Maximum	\$5,000			
				0 1 1				
				y Calcula		on	_	
TOTAL	L BASE PENA	LTY (Sum of	violation	base penali	ties)		Subtotal 1	\$11,850
				·			_	
ADJU:		/-) TO SUBTO		Consity (Subtotal 1) by the indicated i	norcontago		
	Compliance Hi		g the rotal base r	70.0%	Adjustment		tals 2, 3, & 7	\$8,29
	compliance in	Ĭ			· ·		, · · · · <u>-</u>	Ψ0,27
	Notes	Enhancement fo				ability and two		
			agreed orders	without a deni	al of liability.			
	Culmobility	No		0.007	F		Subtotal 4	\$(
	Culpability	INO		0.0%	Enhancement		Subtotal 4	\$(
	Notes	The Re	espondent doe	s not meet the	culpability crit	eria.		
	110100							
							_	
	Good Faith Eff	ort to Comply T	otal Adjustn	nents			Subtotal 5	-\$187
	Economic Bene	afit		0.0%	Enhancement*		Subtotal 6	\$(
	LCOHOITHC BCIN	Total EB Amounts	\$165		d at the Total EB \$	Amount	Subtotal o	Ψ
	Estimated	Cost of Compliance	\$975					
SUM C	OF SUBTOTA	LS 1-7				F	inal Subtotal	\$19,958
OT! 151	D		4434 DEQLU	DE				
		AS JUSTICE N Subtotal by the indi			0.0%		Adjustment	\$0
veduces c	or enhances the rina	Subtotal by the indi	cated percentage	•			1	
	Notes							
	Notes							
						Final Per	nalty Amount	\$19,958
								, ,
STATI	JTORY LIMIT	ADJUSTME	NT			Final Asse	ssed Penalty	\$19,958
				_				
DEFER	RRAL				0.0%	Reduction	Adjustment	\$0
Reduces t	he Final Assessed Pe	nalty by the indicate	d percentage.				1	
	Notes	No (deferral is rec	ommended for	Findings Order	S.		

\$19,958

PCW

Respondent TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION (Tri County Point Water System 3)

Policy Revision 4 (April 2014) PCW Revision September 1, 2019

Case ID No. 49546

Reg. Ent. Reference No. RN101398733

Media Public Water Supply

Enf. Coordinator Aaron Vincent

Compliance History Worksheet

>>	Compliance History	v Site	Enhancement (Subtotal 2)	

Component	Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	2	50%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
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 (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Audits	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%
	<u> </u>		T 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%

	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%
2 3.1.3.	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 70%

>> Repeat Violator (Subtotal 3)

N/A

Adjustment Percentage (Subtotal 3)

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7)

>> Compliance History Summary

Compliance History Notes

Enhancement for one agreed order containing a denial of liability and two agreed orders without a denial of liability.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

70%

S	creening Date			No. 2020-0376-PWS-E	PCW
	Respondent	TRI-COUNTY POINT PROPER	RTY OWNERS ASSOCI	IATION (Tri County	
	•	Politi Water System 3)			cy Revision 4 (April 2014)
Dog Ent I	Case ID No.			PCW Re	vision September 1, 2019
Reg. Liit. i	Reference No. Media	Public Water Supply			
Ent	f. Coordinator				
	iolation Number				
	Rule Cite(s)	,			
	, , ,	30	Tex. Admin. Code §	290.46(i)	
				nance, regulations, or service	
Viola	ation Description			nent to ensure that neither cross- actices are permitted. Specifically	
	-			ovisions for proper enforcement to	
		ensure that unacc	ceptable plumbing pra	actices are not permitted.	
				Base Penalt	y \$5,000
>> Environr	mental, Prope	rty and Human Health	h Matrix		
	B.1	Harm	Mina		
OR	Release Actual		Minor		
O.C	Potential			Percent 0.0%	
		<u> </u>			
>>Program	matic Matrix				
	Falsification	Major Moderate	Minor	Percent 1.0%	
			X	1.0%	
Matr Note		Less than 30% of the	e rule requirements w	vere not met.	
Note					
				Adjustment \$4,95	0
				rajustinent # 1755	
					\$50
Violation Ev	ents				
			_		
	Number of	Violation Events 1	92	Number of violation days	
		daily			
		weekly			
		monthly			
		quarterly		Violation Base Penalt	y \$50
		semiannual annual			
		single event x			
			<u> </u>		
		0		- 4	
		One single	e event is recommende	eu.	
			-		
Good Faith	Efforts to Com	Before NOE/NOV		Reduction	n \$0
		Extraordinary	NOL/NOV to EDI KI/Set	The state of the s	
		Ordinary			
		N/A x			
		The Respon	dent does not meet th	he good faith criteria for	
		Notes	this violatio		
				Violation Subtota	\$50
Fconomic Re	enefit (EB) for	this violation		Statutory Limit Test	
Economic Be			¢2		¢ρς
Economic Be		ed EB Amount	\$2	Violation Final Penalty Tota	
Economic Be		ed EB Amount			

Economic Benefit Worksheet									
Respondent Case ID No. Reg. Ent. Reference No.	49546		OWNERS ASSO	OITAIC	N (Tri County Point	: Water System 3)			
Media Violation No.	Public Water 9	Supply				Percent Interest	Years of Depreciation		
						5.0	15		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount		
Item Description									
5.1.16.1									
Delayed Costs		1		0.00	1 +0	+0	+0		
Equipment				0.00	\$0 \$0	\$0	\$0		
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
Engineering/Construction		1		0.00	\$0	\$0 \$0	\$0 \$0		
Land				0.00	\$0	n/a	\$0		
Record Keeping System				0.00	\$0	n/a	\$0		
Training/Sampling				0.00	\$0	n/a	\$0		
Remediation/Disposal				0.00	\$0	n/a	\$0		
Permit Costs				0.00	\$0	n/a	\$0		
Other (as needed)	\$40	3-Dec-2019	26-Jan-2021	1.15	\$2	n/a	\$2		
Notes for DELAYED costs	agreement, calculated from the investigation date to the estimated date of compliance.								
Avoided Costs	ANNO	ALIZE avoided C	osts perore er	0.00	\$0	one-time avoide	\$0		
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
Supplies/Equipment				0.00	\$0	\$0 \$0	\$0		
Financial Assurance				0.00	\$0	\$0 \$0	\$0		
ONE-TIME avoided costs				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$40			TOTAL		\$2		

	Scre	ening Date	4-Mar-2020	Do	ocket No. 2020-0376-PWS-E		PCW
	R	espondent	TRI-COUNTY PO Water System 3	OINT PROPERTY OWNERS	ASSOCIATION (Tri County Point		
		-	•	3)			Revision 4 (April 2014)
Pog		case ID No. erence No.				PCW Revis	sion September 1, 2019
Reg.	Liit. Kei		Public Water Su	ınnly			
	Enf. C	coordinator		арріу			
		ation Number	2				
		Rule Cite(s)		20 Taux Admain C	2-4- 5 200 46(-)(2)		
				30 Tex. Admin. C	Code § 290.46(n)(2)		
	Violatio	n Description			d up-to-date map of the distribution easily located during emergencie		
					Bas	e Penalty	\$5,000
>> Env	ironme	ntal. Proper	tv and Hum	an Health Matrix			
			_	Harm			
0.0		Release	Major	Moderate Minor	1		
OR		Actual Potential			Percent 0.0%		
		Potential			Percent 0.0%		
>>Proc	ıramma	tic Matrix					
,,,,,,	,	Falsification	Major	Moderate Minor			
			Х		Percent 5.0%		
	Matrix Notes		100	0% of the rule requiremen	its were not met.		
					Adjustment	\$4,750	
							\$250
							Ψ230
Violatio	n Event	ts					
		Number of \	/iolation Events	1	92 Number of violation	days	
			daily weekly monthly quarterly semiannual annual single event	X	Violation Bas	e Penalty	\$250
				One single event is reco	ommended.		
Good Fa	aith Effo	orts to Com		0.0%		Reduction	\$0
				Before NOE/NOV NOE/NOV to E	EDPRP/Settlement Offer		
			Extraordinary				
			Ordinary				
			N/A	X			
			Notes	·	t meet the good faith criteria for s violation.		
						Subtotal	\$250
Econom	nic Bene	fit (EB) for	this violation	on	Statutory Limit	Test	
		Estimate	ed EB Amount	\$9	Violation Final Pen	alty Total	\$425
			-		_		·
				This violation Final	Assessed Penalty (adjusted f	or limits)	\$425

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	POINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	t Water System 3)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101398733	}					
	Public Water S						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		•					
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)	\$180	3-Dec-2019	27-Nov-2020	0.99	\$9	n/a	\$9
Notes for DELAYED costs		stem so that valv	es and mains c	an be e		ccurate and up-to-d g emergencies, calcumpliance.	
Avoided Costs	ANNII	ALTZE avoided o	osts hefore er	terina	item (except for	r one-time avoide	t costs)
Disposal	Aitito	ALIZE avoided e	DOSES DETOTE CI	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

	Scre	ening Date		Docket No. 2020-0376-PWS-E	PCW
	F	Respondent		NT PROPERTY OWNERS ASSOCIATION (Tri County Point	
		-	water System 3)	Polic	Revision 4 (April 2014)
_		ase ID No.		PCW Rev	ision September 1, 2019
Reg.	Ent. Rei		RN101398733		
	F 6 C		Public Water Supp	Dly	
		coordinator ation Number	Aaron Vincent		
	VIOI	Rule Cite(s)			1
		Rule Cite(s)		30 Tex. Admin. Code § 290.44(h)(1)(A)	
	Violatio	n Description	establishments w of an air gap or b § 290.47(f). Spe- connected a wate	nsure additional protection was provided at all residences or here an actual or potential contamination hazard exists in the form packflow prevention assembly, as identified in 30 Tex. Admin. Code cifically, the Respondent drilled into a capped potable waterline and er hose. Furthermore, the hose was laying on the ground providing indirect cross-connection at the wastewater treatment plant. Base Penalty	
				·	\$3,000
>> Env	/ironme	ntal, Propei	ty and Humai	n Health Matrix	
		Dalaasa	Maiau	Harm Madazata Minas	
OR		Release Actual		Moderate Minor	
OK		Potential		Percent 15.0%	
		. otomica	Α	1 01 00110	
>>Proc	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
	Matrix Notes			ntections may allow backflow and siphonage to occur resulting in being exposed to contaminants that would exceed levels protective of human health.	
				Adjustment \$4,250	
					\$750
					φ.σσ
Violatio	on Event	ts			
		Number of \	/iolation Events	15 Number of violation days	
			daily weekly monthly	x	
			quarterly	Violation Base Penalty	\$750
			semiannual		
			annual		
			single event		
		One menthly	avant is recommo	nded, calculated from the December 3, 2019 investigation date to	1
		One monthly		December 18, 2019 compliance date.	
Good F	aith Eff	orts to Com		25.0% Reduction	\$187
			The state of the s	ore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			a		
			Ordinary	х	
			Ordinary N/A	X	
			N/A	The Respondent achieved compliance on December 18, 2019.	
			N/A	The Respondent achieved compliance on December 18,	\$563
Econon	nic Bene	efit (EB) for	N/A	The Respondent achieved compliance on December 18, 2019. Violation Subtotal	\$563
Econon	nic Bene		N/A Notes this violation	The Respondent achieved compliance on December 18, 2019. Violation Subtotal Statutory Limit Test	
Econon	nic Bene		N/A Notes	The Respondent achieved compliance on December 18, 2019. Violation Subtotal	\$1,088

Economic Benefit Worksheet									
Respondent	TRI-COUNTY F	POINT PROPERTY	OWNERS ASSO	OITAIC	N (Tri County Point	: Water System 3)			
Case ID No.	49546	9546							
Reg. Ent. Reference No.	RN101398733								
	Public Water S						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									
<u> </u>									
Delayed Costs									
Equipment	\$30	3-Dec-2019	18-Dec-2019	0.04	\$0	\$0	\$0		
Buildings				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Engineering/Construction				0.00	\$0	\$0	\$0		
Land				0.00	\$0	n/a	\$0		
Record Keeping System				0.00	\$0	n/a	\$0		
Training/Sampling				0.00	\$0	n/a	\$0		
Remediation/Disposal				0.00	\$0	n/a	\$0		
Permit Costs				0.00	\$0	n/a	\$0		
Other (as needed)				0.00	\$0	n/a	\$0		
Notes for DELAYED costs Avoided Costs	,	t	he investigation	date to	o the compliance of	potable waterline, of ate.			
Disposal	Aitito	TELLE GVOIGEG C	OSCS DETOTE CIT	0.00	\$0	\$0	\$0		
Personnel				0.00	\$0	\$0 \$0	\$0		
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0		
Supplies/Equipment				0.00	\$0	\$0	\$0		
Financial Assurance				0.00	\$0	\$0	\$0		
ONE-TIME avoided costs				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$30			TOTAL		\$0		

	Screening Date		Docket No. 2020-0376-PWS-E	PCW
	Respondent		DPERTY OWNERS ASSOCIATION (Tri County Point	
	_	Water System S)	Polic	y Revision 4 (April 2014)
	Case ID No.		PCW Rev	ision September 1, 2019
Reg. E	int. Reference No.			
		Public Water Supply		
	Enf. Coordinator			
	Violation Number			1
	Rule Cite(s)	30 TCX: Admin. CC	ode § 290.45(b)(1)(C)(ii), Tex. Health & Safety Code § EQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.c.ii	
	Violation Description	the Facility had 145 con	l storage capacity of 200 gallons per connection. Specifically, nections requiring a total storage capacity of 29,000 gallons. one was provided, indicating a 100% deficiency.	
			Base Penalty	\$5,000
>> Envi	ronmental, Prope	rty and Human Hea	alth Matrix	
		Harn	m	
	Release		ate Minor	
OR	Actual			
	Potential	Х	Percent 15.0%	
>> Drog	rammatic Matrix			
>>Prog	rammatic Matrix Falsification	Major Modera	ate Minor	
	1 disineution	Major Modere	Percent 0.0%	
			1 creent 0.070	
			e capacity could expose persons served by the Facility to xceed levels that are protective of human health.	
			Adjustment \$4,250]
				\$750
Violatio	n Events			
Violatio	ii Evenes			
	Number of '	Violation Events 7	185 Number of violation days	
		daily		
		weekly		
		monthly x		+5.250
		quarterly	Violation Base Penalty	\$5,250
		semiannual annual		
		single event		
		Single event		
	Seven month	•	ded, calculated from the effective date of this PCW revision, 9, to the screening date, March 4, 2020.	
Good Fa	ith Efforts to Com	nlv 0	.0% Reduction	\$0
dood i d	inchi Errorts to Com	Before NOE/		φσ
		Extraordinary		
		Ordinary		
		N/A X		
		The C	mandant dans mat mant the man it follows the feet	
		Notes The Res	spondent does not meet the good faith criteria for this violation.	
		Notes The Res	this violation.	
		Notes	this violation. Violation Subtotal	\$5,250
Econom	ic Benefit (EB) for	Notes	this violation.	\$5,250
Econom		Notes	this violation. Violation Subtotal	
Econom		this violation	this violation. Violation Subtotal Statutory Limit Test	\$8,925

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	POINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	: Water System 3)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101398733						
	Public Water S	Supply				Percent Interest	Years of
Violation No.	4					ı	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs				PCW N	lo. 1.	captured in Violation	
Avoided Costs	ANNU	ALIZE avoided C	osts before er			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs		<u> </u>		<u> 0.00</u>	1 \$0	ΦU	\$0
Approx. Cost of Compliance		\$0			TOTAL		\$0

	Screening Date		Docket No. 2020-0376-PWS-E	PCW
	• • • • • • • • • • • • • • • • • • •		OWNERS ASSOCIATION (Tri County Point	Policy Revision 4 (April 2014)
D	Case ID No.			PCW Revision September 1, 2019
Reg. Ent	t. Reference No.			
-	media inf. Coordinator	Public Water Supply		
-	Violation Number			
	Rule Cite(s)		290.45(b)(1)(C)(iii), Tex. Health & Safety Coo	de §
			eed Order Docket No. 2014-1590-PWS-E, Or	
		, ,	Provision No. 2.c.i	_
			e service pumps having a total capacity of 2.0	
Vi	olation Description		onnection at each pump station or pressure p 145 connections requiring a service pump cap	
			e pumps were provided, indicating a 100% do	•
		,,,,	- Familia mana Eramana, manaanii 3 a aasia a	
	•	1		
			Base	Penalty \$5,000
>> Enviro	nmental, Propei	rty and Human Health N	Matrix	
	-	Harm		
OR	Release	Major Moderate	Minor	
OR	Actual Potential		Percent 15.0%	
	Foteritian	X	Percent 13.0%	
>>Progra	mmatic Matrix			
	Falsification	Major Moderate	Minor	
			Percent 0.0%	
M	atrix Failure to pro	ovide adequate service pump ca	pacity could expose persons served by the F	acility to
N	otes co	ntaminants that would exceed l	evels that are protective of human health.	
			Adjustment	\$4,250
				\$750
				\$730
Violation I	Events			
	Ni and have a 6 \	(inlation Frants)	105 Number of violeties	Ja
	Number of v	Violation Events 7	185 Number of violation of	Jays
		daily		
		weekly		
		monthly x		
		quarterly	Violation Base	Penalty \$5,250
		semiannual		
		annual single event		
		single event		
	C		alandata di Garar Harri Markina data anni Nica DOW	
	Seven month	•	alculated from the effective date of this PCW ne screening date, March 4, 2020.	revision,
		' '	3 , ,	
Good Faitl	h Efforts to Com	ply 0.0%	F	Reduction \$0
			NOE/NOV to EDPRP/Settlement Offer	
		Extraordinary		
		Ordinary		
		N/A x		
		Notes The Responde	nt does not meet the good faith criteria for	
		IVOLES	this violation.	
		<u> -</u>		College
			Violation	Subtotal \$5,250
Economic	Benefit (EB) for	this violation	Statutory Limit	Test
	Estimate	ed EB Amount	\$0 Violation Final Pena	alty Total \$8,925
				
			ition Final Assessed Penalty (adjusted fo	or limits) \$8,925

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	OINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	: Water System 3)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101398733						
	Public Water S	Supply				Percent Interest	Years of
Violation No.	5						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs				PCW N	lo. 1.	captured in Violation	
Avoided Costs	ANNU	ALIZE avoided C	osts before er			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 #0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed) Notes for AVOIDED costs		<u>II </u>		<u> 0.00</u>	1 \$0	\$ 0	\$ 0
Approx. Cost of Compliance		\$0			TOTAL		\$0

!	Screening Date		Docket No. 2020-0376-PWS-E	PCW
	•		RTY OWNERS ASSOCIATION (Tri County Point	Policy Revision 4 (April 2014)
	Case ID No.			PCW Revision September 1, 2019
Reg. Ent.	. Reference No			
E.		Public Water Supply		
E	nf. Coordinator Violation Number			
	Rule Cite(s)		00.46(0)(2) (0)(2)(4)(1) (0)(2)(0)(2)(0)	(i) d
	ruic cite(s)	50 10/11 / tallillilli	90.46(f)(2), (f)(3)(A)(iv), (f)(3)(B)(v), (f)(3)(D) Agreed Order Docket No. 2014-1590-PWS-E, Or Provision No. 2.a.i	
		Failed to maintain water w	orks operation and maintenance records and ma	ake them
		,	ew by the Executive Director upon request. Spec	* *
Vio	olation Description		dead-end mains were flushed, backflow preventi f inspections for all pressure maintenance faciliti	
			rvice Inspection ("CSI") reports were not maintain	
			site for review.	
		<u></u>		
			Base	Penalty \$5,000
>> Enviror	nmental, Prope	erty and Human Healtl	h Matrix	
	Release	Harm • Major Moderate	Minor	
OR	Actua			
	Potentia	ni	Percent 0.0%	
>>Progran	nmatic Matrix Falsification	Major Moderate	Minor	
	1 districation	Major Moderate	x Percent 1.0%	
Ma	. Marita d			
	atrix otes	Less than 30% of the	ne rule requirements were not met.	
110	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
			Adjustment	\$4,950
			Aujustinent	
				\$50
Violation E	vents			
	Number of	Violation Events 1	92 Number of violation of	days
		daily	¬	
		weekly	-	
		monthly		
		quarterly	Violation Base	Penalty \$50
		semiannual		
		annualx	_	
		single event x	<u></u>	
		One single	e event is recommended.	
Good Faith	Efforts to Con	nply 0.0%	6	Reduction \$0
		Before NOE/NO\	V NOE/NOV to EDPRP/Settlement Offer	
		Extraordinary		
		Ordinary		
		N/A x		
		Notes The Respor	ndent does not meet the good faith criteria for	
			this violation.	
		!		College 1
			Violation	-
Economic I	Renefit (FR) fo	u Alain suin la Ainm	Statutory Limit	Test
	belieffe (LB) fo	r this violation	Statutory Limit	
		ted EB Amount	\$13 Violation Final Pena	
		ted EB Amount		alty Total \$85

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	OINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	t Water System 3)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101398733						
	Public Water S					Percent Interest	Years of
Violation No.	6					i creent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$45	7-May-2015	27-Nov-2020	5.56	\$13	n/a	\$13
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	records an calculated from	d make them imnom the effective o	nediately availat date of TCEQ Ag dat	ole for i reed Or e of co	nspection upon red der Docket No. 20 mpliance.	stem operation and quest by the Executi 114-1590-PWS-E to	ve Director, the estimated
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$45			TOTAL		\$13

		ening Date				cet No. 2020-0376-PWS-E		PCW
	F	Respondent	TRI-COUNTY POIN	NT PROPERT	Y OWNERS ASS	SOCIATION (Tri County Point	Policy	Revision 4 (April 2014)
		Case ID No.					PCW Revis	sion September 1, 2019
Reg.	Ent. Ref	ference No.	RN101398733					
			Public Water Supp	oly				
		Coordinator	Aaron Vincent					
	Viol	ation Number	7					
		Rule Cite(s)		30	Tex. Admin. Cod	de § 290.46(i)		
						providing continuous water se		
						hen the water purveyor has re		
	Violatio	n Description				ntial contamination hazards ex		
			Specifically, t	ne kespond	connection	e CSI certificates completed at	new	
					Comrecen			
						Page 1	. Danale.	фE 000
						base	Penalty	\$5,000
>> Env	vironme	ntal, Proper	ty and Humar	n Health	Matrix			
				Harm				
OR		Release	Major I	Moderate	Minor			
OK		Actual Potential				Percent 0.0%		
		Fotential				Percent 0.0%		
>>Pro	aramma	tic Matrix						
, , , , ,	9	Falsification	Major I	Moderate	Minor			
			Х			Percent 5.0%		
					•			
	Matrix							
	Notes		100%	of the rule	requirements w	vere not met.		
	Notes							
							===	
						Adjustment	\$4,750	
								\$250
Violatio	on Event	ts						
		Number of V	/ialatian Evanta	1		Number of violation of	day.c	
		Number of V	/iolation Events	1		92 Number of violation of	lays	
			daily					
			weekly					
			monthly					
			quarterly			Violation Base	Penalty	\$250
			semiannual					
			annual					
			single event	X				
				One cinale (event is recomm	pended		
				one single (event is reconni	ieriaca.		
Good F	aith Effe	orts to Com		0.0%			Reduction	\$0
				re NOE/NOV	NOE/NOV to EDPR	P/Settlement Offer		
			Extraordinary					
			Ordinary					
			N/A	Х				
			Natas TI	he Respond	ent does not me	eet the good faith criteria for		
			Notes	·	this vio			
			<u> </u>					
						Violation	Subtotal	\$250
Fconor	nic Rene	fit (FR) for	this violation			Statutory Limit	Test	
200101	c Delle	ALC (LD) IOI	City Violation			Statutory Emilit	1031	
		Estimate	ed EB Amount		\$141	Violation Final Pena	Ity Total	\$425
				This viol	lation Final Ac	sessed Penalty (adjusted fo	r limits)	\$425
				VIUI	acion i mai As	cooca i charty (aujusteu it		رعبه

	E	conomic	Benefit	Wo	rksheet		
		OINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	t Water System 3)	
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S	upply				Percent Interest	Years of Depreciation
Violation No.	/						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Dolawad Casta							
Delayed Costs Equipment		1	1	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	1100	10.0 : 0016		0.00	\$0	n/a	\$0
Record Keeping System	\$180	19-Oct-2016	26-Jan-2021	4.27	\$38	n/a	\$38
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	19-Oct-2016	27-Nov-2020	4.11	\$103	n/a	\$103
Notes for DELAYED costs	locations whe of the The Other (as	ere a cross-connection inition in the investigation inition needed) delayed ice connections are	ction or potentia ially documentin cost includes the re properly inspe	I conta g the v e estin	mination hazard m riolation to the esti nated amount to in	It to complete CSI con exist, calculated mated date of composite of composite date of the investige of compliance.	from the date pliance.
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$680			TOTAL		\$141



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014) PCW Revision September 1, 2019

Assigned 10-Feb-2020 PCW 25-Feb-2020 Screening 18-Feb-2020 **DATES**

PAYABLE PENALTY

EPA Due

	PCW	25-Feb-2020	Screening 18-F	eb-2020	EPA Due			
DESDO	NIDENT/EACH I	TY INFORMATIO	M					
KESFU		TRI-COUNTY POIN		NIEDS ASS	OCIATION (Tri (County Point	Water System (1)	
Red	g. Ent. Ref. No.		II FROFERIT OW	NERS ASS	OCIATION (III)	County Foint	water System 4)	<u>'</u>
		14-Corpus Christi			Major/M	linor Source	Minor	
	. .							
CASE I	NFORMATION							
En	f./Case ID No.				No. o	of Violations		
		2020-0376-PWS-E				Order Type		
Med		Public Water Supp	ly		Government			
	Multi-Media				Enf. (Aaron Vincent	
			φ50	· [* 5.000	EC's Team	Enforcement Tea	am 2
Adr	nin. Penaity \$ i	Limit Minimum	\$50 Maxi	mum	\$5,000			
			Penalty C	'alcula	tion Section	nn		
TOTA	L DACE DENIA	NTV (C				/ I	0.44.44	#F 400
IOIA	L BASE PENA	ALTY (Sum of v	iolation base	e penan	ies)		Subtotal 1	\$5,100
ADJUS	STMFNTS (+	/-) TO SUBTO	ΓAI 1					
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		btained by multiplying the		(Subtotal 1) by the indicated pe	ercentage.		
	Compliance Hi	story		45.0%	Adjustment	Subto	otals 2, 3, & 7	\$2,295
		Enhancement for	r one agreed ord	er contain	ing a denial of l	iahility and		
	Notes		agreed order wit			lability and		
		0110	agreed erder wit	nout a ac	mar or madmity.			
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
				0.0.0				7.0
	Notes	The Resp	ondent does not	meet the	culpability crite	ria.		
	0		- I A PII				0.44.4.4.5	•
	Good Faith Eff	ort to Comply Tot	iai Adjustments				Subtotal 5	\$0
	Economic Bene	efit		0.0%	Enhancement*		Subtotal 6	\$0
		Total EB Amounts	\$4,042	*Cappe	d at the Total EB \$ A	Amount		
	Estimated	d Cost of Compliance	\$40,775					
CLINA	OF CURTOTAL	1047				_		#7.00 F
SUIVI C	OF SUBTOTA	LS 1-7				F	Final Subtotal	\$7,395
OTLIE		AC HICTICE MA	V DECLUDE		0.007			¢ 0
		AS JUSTICE MA I Subtotal by the indicat			0.0%		Adjustment	\$0
Reduces (or entrances the time	Subtotal by the indicat	eu percentage.				1	
	Notes							
	Notes							
						Final Per	nalty Amount	\$7,395
							y ///od///	Ψ1,075
STATI	JTORY LIMIT	T ADJUSTMENT	Γ			Final Asse	essed Penalty	\$7,395
DEFER	RRAL				0.0%	Reduction	Adjustment	\$0
		enalty by the indicated p	ercentage.					7.5
	Notes	No de	ferral is recomme	ended for	Findings Orders			

\$7,395

45%

Screening Date 18-Feb-2020

Docket No. 2020-0376-PWS-E

Respondent TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION (Tri County Point Water System 4)

Policy Revision 4 (April 2014) PCW Revision September 1, 2019

Case ID No. 49546

Reg. Ent. Reference No. RN101399228

>> Final Compliance History Adjustment

Media Public Water Supply

Enf. Coordinator Aaron Vincent

Component	ory Site 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 (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
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 (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
	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 (Su	btotal 2)
peat Violator	(Subtotal 3)		
N/A	Adjustment Per	centage (Su	btotal 3)
mpliance Hist	cory Person Classification (Subtotal 7)		
Satisfactory		contaco (S.:	htotal 7
, , , , , , , , , , , , , , , , , , ,		centaye (Sui	viviai /)
mpliance Hist	ory Summary		
Compliance History	Enhancement for one agreed order containing a denial of liability and one agreed of denial of liability.	order without a	

Final Adjustment Percentage *capped at 100%

	Scie	ening Date				cet No. 2020-0376-PWS-E		PCW
	R	espondent	TRI-COUNTY PO	DINT PROPERT	TY OWNERS AS	SOCIATION (Tri County		
		-	Point Water Sys	stem 4)				Revision 4 (April 2014)
D		ase ID No.					PCW Revis	ion September 1, 2019
кед.	ent. Ker	erence No.						
	Enf C		Public Water Su Aaron Vincent	thhià				
		tion Number	1	Ī				
	*1010							
		Rule Cite(s)		30 Te	x. Admin. Code	e § 290.46(n)(2)		
			Failed to make	available an a	ccurate and ur	o-to-date map of the distribution	nn system	
	Violatio	n Description				sily located during emergencie		
						Race	e Penalty	\$5,000
						Dusk	o i citaley	ψ3,000
>> Env	/ironme	ntal, Proper	ty and Hum		Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual	Hajoi	Hoderate	MINO			
		Potential				Percent 0.0%		
		'						
>>Prog	gramma	tic Matrix	Madan	Madauska	Mina			
		Falsification	Major	Moderate	Minor	Percent 5.0%		
			Х			Fercent 3.0%		
	Matrix		100	% of the rule	requirements v	were not met.		
	Notes							
	'							
						Adjustment	\$4,750	
							-	+250
								\$250
\/:-I-+:-	=						L	\$250
Violatio	on Event	:s					L	\$250
Violatio	on Event		/iolation Events	1		77 Number of violation o	days	\$250
Violatio	on Event			1		Number of violation of	days	\$250
Violatio	on Event		daily	1		77 Number of violation (days	\$250
Violatio	on Event		daily weekly	1		77 Number of violation (days	\$250
Violatio	on Event		daily weekly monthly	1			_	·
Violatio	on Event		daily weekly monthly quarterly	1		77 Number of violation of Violation Base	_	\$250 \$250
Violatio	on Event		daily weekly monthly	1			_	·
Violatio	on Event		daily weekly monthly quarterly semiannual	1			_	·
Violatio	on Event		daily weekly monthly quarterly semiannual annual				_	·
Violatio	on Event		daily weekly monthly quarterly semiannual annual	X	event is recomm	Violation Base	_	·
Violatio	on Event		daily weekly monthly quarterly semiannual annual	X	event is recomm	Violation Base	_	·
		Number of \	daily weekly monthly quarterly semiannual annual single event	x One single e	event is recomm	Violation Base	e Penalty	\$250
			daily weekly monthly quarterly semiannual annual single event	x One single e		Violation Base	_	·
		Number of \	daily weekly monthly quarterly semiannual annual single event	x One single e		Violation Base	e Penalty	\$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	x One single e		Violation Base	e Penalty	\$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	X One single e		Violation Base	e Penalty	\$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single e 0.0% efore NOE/NOV	NOE/NOV to EDP	Violation Base	e Penalty	\$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single e 0.0% efore NOE/NOV	NOE/NOV to EDP	Violation Base mended. RP/Settlement Offer eet the good faith criteria for	e Penalty	\$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single e 0.0% efore NOE/NOV	NOE/NOV to EDP	Violation Base	e Penalty	\$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single e 0.0% efore NOE/NOV	NOE/NOV to EDP	violation Base	Reduction	\$250
Good F	aith Effo	Number of \	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	One single e O.0% efore NOE/NOV X The Responde	NOE/NOV to EDP	violation Base mended. RP/Settlement Offer eet the good faith criteria for olation. Violation	Reduction Subtotal	\$250
Good F	aith Effo	Number of \	daily weekly monthly quarterly semiannual annual single event	One single e O.0% efore NOE/NOV X The Responde	NOE/NOV to EDP	violation Base	Reduction Subtotal	\$250
Good F	aith Effo	Number of \\ orts to Com	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	x One single e 0.0% efore NOE/NOV X The Responde	NOE/NOV to EDP	violation Base mended. RP/Settlement Offer eet the good faith criteria for olation. Violation	Reduction Subtotal Test	\$250
Good F	aith Effo	Number of \\ orts to Com	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes this violation	One single e O.0% efore NOE/NOV X The Responde	NOE/NOV to EDP	wended. RP/Settlement Offer eet the good faith criteria for plation. Violation Statutory Limit	Reduction Subtotal Test alty Total	\$250 \$0 \$250

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	POINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	t Water System 4)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101399228						
	Public Water S					B	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		·					
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)	\$180	3-Dec-2019	27-Nov-2020	0.99	\$9	n/a	\$9
Notes for DELAYED costs		stem so that valv	es and mains c	an be e		ccurate and up-to-d g emergencies, calcu	
						•	
Avoided Costs	ANNU	ALIZE avoided o	osts before er			one-time avoide	
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs		,,		0.00	1 40	Ψ0	

	Scre	ening Date		Docket No. 2020-0376-PWS-E	PCW
	R	espondent	TRI-COUNTY POI Water System 4)	INT PROPERTY OWNERS ASSOCIATION (Tri County Point	y Revision 4 (April 2014)
	c	ase ID No.			rision September 1, 2019
Reg.	Ent. Ref	erence No.			
	Enf C		Public Water Sup	pply	
		ntion Number	Aaron Vincent		
		Rule Cite(s)	30 Tex. Adm	nin. Code § 290.45(b)(1)(C)(ii) and Tex. Health & Safety Code §	1
				341.0315(c)	
	Violatio	n Description	the Facility had	a total storage capacity of 200 gallons per connection. Specifically, 81 connections requiring a total storage capacity of 16,200 gallons. vever, none was provided, indicating a 100% deficiency.	
				Base Penalty	\$5,000
>> Env	/ironme	ntal, Propei	ty and Huma	n Health Matrix	
		Release	Major	Harm Moderate Minor	
OR		Actual			
		Potential	Х	Percent 15.0%	
>>Prog	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
	Man buda a	Failure to	provide adequate	storage conscitus could expece persons conved by the Encility to	1
	Matrix Notes			storage capacity could expose persons served by the Facility to would exceed levels that are protective of human health.	
				<u> </u>]
				Adjustment \$4,250	
					\$750
					ψ730
Violatio	on Event	:S			
		Number of \	/iolation Events	Number of violation days	
			daily weekly		
			monthly	х	
			quarterly semiannual	Violation Base Penalty	\$2,250
			annual		
			single event		
					1
		Three monthly		mmended, calculated from the December 3, 2019 investigation date the February 18, 2020 screening date.	
Good F	aith Effo	orts to Com	ply	0.0% Reduction	\$0
			Total Control of the	fore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary Ordinary		
			N/A	X	
			-	The Respondent does not meet the good faith criteria for	
			Notes	this violation.	
			<u>L</u>	Violation Subtota	\$2,250
Econom	nic Porc	fi+ (ED) fa-	thic violation		
ECONON	inc bene	:::(EB) 10F	this violation		
		Estimate	ed EB Amount	\$3,406 Violation Final Penalty Tota	\$3,263
				This violation Final Assessed Penalty (adjusted for limits)	\$3,263

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	OINT PROPERTY	OWNERS ASSO	CIATIO	V (Tri County Point	t Water System 4)	
Case ID No.	49546				,		
Reg. Ent. Reference No.	RN101399228						
	Public Water S					Percent Interest	Years of Depreciation
Violation No.	2					F 0	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$34,830	3-Dec-2019	26-Apr-2021	1.40	\$162	\$3,244	\$3,406
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	per connecti	on (\$2.15 x 16,20	00 gallons), calc	ulated f compli	from the investigate ance.	age capacity of at leation date to the esti	mated date of
Avoided Costs	ANNU	ALIZE avoided c	osts before en		<u> </u>	r one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0
Other (as needed) Notes for AVOIDED costs		<u>I</u>		0.00	<u> \$U</u>	1 \$0	\$0
Approx. Cost of Compliance		\$34,830			TOTAL		\$3,406

	g Date 18-Feb-2	.020		No. 2020-0376-PWS-E		PCW
Respo	ondent TRI-COU Water Sy	NTY POINT PROPERT	Y OWNERS ASSOC	CIATION (Tri County Point		
_	water 3y	Stem 4)				Revision 4 (April 2014)
	ID No. 49546				PCW Revision	on September 1, 2019
Reg. Ent. Referen						
Enf Coore	Media Public Wa					
Violation	dinator Aaron Vii	ncent				
		A 1	00.45(1)(4)(0)(***)	1.T. II. III. 0.C. C		
Rule	30 To	ex. Admin. Code § 2	90.45(b)(1)(C)(iii) 341.0315(c	and Tex. Health & Safety C)	ode §	
	Failed t	o provide two or mo	re service pumps h	aving a total capacity of 2.0	gallons	
Violation Des				pump station or pressure p		
Violation Bes	Specifica	• • •	•	uiring a service pump capac		
	gpm. I	However, no service	pumps were provi	ded, indicating an 100% def	ficiency.	
				Base	Penalty	\$5,000
>> Environmental,	Droporty and	Human Haalth	Matrix			
// Elivirollillelitai,	Property and	Harm	Matrix			
	Release Majo		Minor			
OR	Actual					
	Potential x			Percent 15.0%		
>>Programmatic M			Mala			
Fals	sification Majo	or Moderate	Minor	Davasant 0.00/		
				Percent 0.0%		
Matrix Fail	ure to provide aded	quate service pump o	capacity could expo	se persons served by the F	acility to	
Notes	contaminan	ts that would exceed	levels that are pro	otective of human health.		
				Adjustment	\$4,250	
				/ La jubilione		
				Aujustineite		\$750
Violation Events				, rejustinent		\$750
Violation Events				, and a second		\$750
	ımber of Violation E	ivents 3	7			\$750
	ımber of Violation E	ivents 3	7			\$750
	ımber of Violation E dail		7			\$750
	dail week	y cly	7			\$750
	dail week monti	y sty	7	7 Number of violation o	days	·
	dail week monti quarte	y sty sty sty sty sty sty sty sty sty st	7		days	\$750 \$2,250
	dail week monti quarte semian	y		7 Number of violation o	days	·
	dail week monti quarte semian annu	y	7	7 Number of violation o	days	·
	dail week monti quarte semian	y	7	7 Number of violation o	days	·
Nu	dail week monti quarte semian annu single e	y		7 Number of violation o	days e Penalty	·
Nu	dail week monti quarte semian annu single e	y	alculated from the	Number of violation of Violation of Violation Base December 3, 2019 investigation by the Violation Base	days e Penalty	·
Nu	dail week monti quarte semian annu single e	y		Number of violation of Violation of Violation Base December 3, 2019 investigation by the Violation Base	days e Penalty	·
Nu	dail week monti quarte semian annu single e	y	alculated from the	Number of violation of Violation Bases December 3, 2019 investigating date.	days Penalty ation date	\$2,250
Nu	dail week monti quarte semian annu single e	y	alculated from the	Number of violation of Violation Base Violation Base December 3, 2019 investigating date.	days e Penalty	·
Nu	dail week monti quarte semian annu single e	y	alculated from the 18, 2020 screeni	Number of violation of Violation Base Violation Base December 3, 2019 investigating date.	days Penalty ation date	\$2,250
Nu	dail week month quarte semian annu single e e monthly events a to Comply	y	alculated from the 18, 2020 screeni	Number of violation of Violation Base Violation Base December 3, 2019 investigating date.	days Penalty ation date	\$2,250
Nu	dail week month quarte semian annu single e e monthly events a to Comply	y	alculated from the 18, 2020 screeni	Number of violation of Violation Base Violation Base December 3, 2019 investigating date.	days Penalty ation date	\$2,250
Nu	dail week month quarte semian annu single e e monthly events a to Comply	re recommended, cato the February 0.0% Before NOE/NOV dinary N/A X	alculated from the 18, 2020 screeni	Number of violation of Violation Base Violation Base December 3, 2019 investigating date.	days Penalty ation date	\$2,250
Nu	dail week month quarte semian annu single e e monthly events a to Comply Extraore	re recommended, cato the February 0.0% Before NOE/NOV dinary N/A X	alculated from the 18, 2020 screening NOE/NOV to EDPRP/S	Number of violation of Violation Base Violation Base December 3, 2019 investigated attement Offer the good faith criteria for	days Penalty ation date	\$2,250
Nu	dail week month quarte semian annu single e e monthly events a to Comply Extraore	re recommended, co to the February 0.0% Before NOE/NOV dinary N/A x The Responded	alculated from the 18, 2020 screeni	Number of violation of Violation Base Violation Base December 3, 2019 investigated attement Offer the good faith criteria for	days Penalty ation date	\$2,250
Nu	dail week month quarte semian annu single e e monthly events a to Comply Extraore	re recommended, co to the February 0.0% Before NOE/NOV dinary N/A x The Responded	alculated from the 18, 2020 screening NOE/NOV to EDPRP/S	Number of violation of Violation Base December 3, 2019 investigating date. ettlement Offer the good faith criteria for ion.	days Penalty ation date Reduction	\$2,250
Three Good Faith Efforts	dail week month quarte semian annu single e e monthly events a to Comply Extraore Ore	re recommended, cato the February O.0%	alculated from the 18, 2020 screening NOE/NOV to EDPRP/S	Number of violation of Violation Base Violation Base December 3, 2019 investigating date. Entirement Offer the good faith criteria for ion. Violation	days Penalty ation date Reduction	\$2,250
Nu	dail week month quarte semian annu single e e monthly events a to Comply Extraore Ore	re recommended, cato the February O.0%	alculated from the 18, 2020 screening NOE/NOV to EDPRP/S	Number of violation of Violation Base December 3, 2019 investigating date. ettlement Offer the good faith criteria for ion.	days Penalty ation date Reduction	\$2,250
Three Good Faith Efforts	dail week month quarte semian annu single e e monthly events a to Comply Extraore Ore	re recommended, compared to the February O.0%	alculated from the 18, 2020 screening NOE/NOV to EDPRP/S	Number of violation of Violation Base Violation Base December 3, 2019 investigating date. Entirement Offer the good faith criteria for ion. Violation	days Penalty ation date Reduction Subtotal Test	\$2,250
Three Good Faith Efforts	dail week month quarte semian annu single e e monthly events a to Comply Extraore Ore	verly x y y y y y y y y y y y y y y y y y y	NOE/NOV to EDPRP/S ent does not meet this violat	Number of violation of Violation Base Violation Base December 3, 2019 investigated by the good faith criteria for ion. Violation Statutory Limit	days Penalty ation date Reduction Subtotal Test alty Total	\$2,250 \$0 \$2,250

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.		OINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Poin	t Water System 4)	
Reg. Ent. Reference No. Media Violation No.	Public Water S	upply				Percent Interest	Years of Depreciation
VIOIALIOII NO.	3					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment	\$5,000	3-Dec-2019	26-Apr-2021	1.40	\$23	\$466	\$489
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)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	of at leas	t 2.0 gpm per con	nection, calcula	ted fror compli	n the investigatior ance.	service pumps with a date to the estima	ted date of
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Notes for AVOIDED costs				0.00	1 \$0	\$0	\$0
Approx. Cost of Compliance		\$5,000			TOTAL		\$489

		ening Date	10 1 05 2020			et No. 2020-0376-PWS-E		PCW
	R	espondent	TRI-COUNTY PO	DINT PROPERTY	OWNERS ASS	OCIATION (Tri County Point		
		-	Water System	4)			Policy F	Revision 4 (April 2014)
	_	ase ID No.					PCW Revision	on September 1, 2019
Reg. En	nt. Ref		RN101399228					
			Public Water Su	apply				
			Aaron Vincent	1				
	Viola	tion Number	4					
		Rule Cite(s)		20 To	v Admin Cod	o 5 200 46(i)		
				30 Te.	x. Admin. Cod	e g 290.40(1)		
						nce, regulations, or service agi		
	/iolotion	Docarintian				sure that neither cross-connec		
•	ribiatibi	n Description				permitted. Specifically, the Cur or proper enforcement to ensu		
			Jei vice Agree			ces are not permitted.	re that	
				аассортав.е р	.asg prace	555 4.5 Hot permitted.		
						_		+5.000
						Base	Penalty	\$5,000
>> Envir	onmer	stal Droper	ty and Hum	an Health M	atriv			
Elivir	Jiiiiei	itai, Piopei	cy and num	Harm	atiix			
		Release	Major	Moderate	Minor			
OR		Actual						
		Potential				Percent 0.0%		
		<u> </u>			<u>,</u>			
>>Progra	ammat	tic Matrix						
	6	Falsification	Major	Moderate	Minor			
					X	Percent 1.0%		
	i i							
,	Matrix							
	Notes		Less tha	an 30% of the ru	le requiremen	ts were not met.		
	11000							
						Adjustment	\$4,950	
								\$50
								\$50
Violation	Event	s						\$50
Violation	Event	s						\$50
Violation	Event		/iolation Events	1		77 Number of violation d	ays	\$50
Violation	Event		/iolation Events	1		77 Number of violation d	ays	\$50
Violation	Event		/iolation Events daily	1		77 Number of violation d	ays	\$50
Violation	Event		daily weekly	1		77 Number of violation d	ays	\$50
Violation	Event		daily weekly monthly	1			_	·
Violation	Event		daily weekly monthly quarterly	1		77 Number of violation de Violation Base	_	\$50 \$50
Violation	Event		daily weekly monthly quarterly semiannual				_	·
Violation	Event		daily weekly monthly quarterly semiannual annual				_	·
Violation	Event		daily weekly monthly quarterly semiannual	1			_	·
Violation	Event		daily weekly monthly quarterly semiannual annual				_	·
Violation	Event		daily weekly monthly quarterly semiannual annual	X	ent is recomm	Violation Base	_	·
Violation	Event		daily weekly monthly quarterly semiannual annual		ent is recomm	Violation Base	_	·
		Number of \	daily weekly monthly quarterly semiannual annual single event	X	ent is recomm	Violation Base	_	·
			daily weekly monthly quarterly semiannual annual single event	X One single eve		Violation Base ended.	_	·
		Number of \	daily weekly monthly quarterly semiannual annual single event	X One single eve		Violation Base ended.	Penalty	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event	X One single eve		Violation Base ended.	Penalty	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event	X One single eve		Violation Base ended.	Penalty	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event	X One single eve		Violation Base ended.	Penalty	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary	One single eve	DE/NOV to EDPRF	Violation Base ended. R //Settlement Offer	Penalty	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary	One single eve	DE/NOV to EDPRF	Violation Base ended. R /Settlement Offer et the good faith criteria for	Penalty	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single eve	DE/NOV to EDPRF	Violation Base ended. R /Settlement Offer et the good faith criteria for	Penalty	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single eve	DE/NOV to EDPRF	Violation Base ended. /Settlement Offer et the good faith criteria for ation.	Penalty eduction	\$50
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single eve	DE/NOV to EDPRF	Violation Base ended. R /Settlement Offer et the good faith criteria for	Penalty eduction	\$50
Good Fait	th Effo	Number of \	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	One single eve	DE/NOV to EDPRF	Violation Base ended. /Settlement Offer et the good faith criteria for ation. Violation S	Penalty eduction	\$50
Good Fait	th Effo	Number of \	daily weekly monthly quarterly semiannual annual single event	One single eve	DE/NOV to EDPRF	Violation Base ended. /Settlement Offer et the good faith criteria for ation.	Penalty eduction	\$50 \$0
Good Fait	th Effo	Number of \	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	One single eve	DE/NOV to EDPRF	Violation Base ended. /Settlement Offer et the good faith criteria for ation. Violation S	Penalty eduction Subtotal	\$50 \$0
Good Fait	th Effo	Number of \	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	One single eve	t does not me this viol	Violation Base ended. /Settlement Offer et the good faith criteria for ation. Violation S Statutory Limit	Penalty eduction Gubtotal Test	\$50 \$0 \$50

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY F	POINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	t Water System 4)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101399228	1					
	Public Water S					B	Years of
Violation No.	4					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$40	3-Dec-2019	26-Jan-2021	1.15	\$2	n/a	\$2
Notes for DELAYED costs Avoided Costs	agre	eement, calculated	d from the inves	stigatior	n date to the estim	e plumbing ordinand ated date of compli	ance.
Disposal	7.1.1.10	1	obto belole el	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs		<u> </u>			7-7	¥ -	
Approx. Cost of Compliance		\$40			TOTAL		\$2

	Scre	ening Date	18-Feb-2020 Docket No. 2020-0376-PWS-E	PCW
	F	Respondent	TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION (Tri County Point Water System 4)	
		•	, ,	Policy Revision 4 (April 2014)
Pea		Case ID No. ference No.		CW Revision September 1, 2019
Reg.	LIIL. KE		Public Water Supply	
	Fnf. (Coordinator		
		ation Number	5	
		Rule Cite(s)	20.7	(1)
			30 Tex. Admin. Code § 290.46(f)(2), (f)(3)(A)(iv), (f)(3)(B)(v), and (f)(3)(D)	(11)
	Violatio	n Description	Failed to maintain water works operation and maintenance records and make to readily available for review by the Executive Director upon request. Specificate records for the dates that dead-end mains were flushed, backflow prevention of programs and the results of inspections for all pressure maintenance facilities not maintained on-site for review.	ally, evice
			Base Pe	s5,000
>> Env	vironme	ntal, Propei	ty and Human Health Matrix	
		D-J	Harm Major Madarata Minar	
OR		Release Actual	Major Moderate Minor	
OK		Potential	Percent 0.0%	
		roteritiai	1 Crecine 0.070	
>>Pro	gramma	itic Matrix		
		Falsification	Major Moderate Minor	
			X Percent 1.0%	
	Matrix Notes		Less than 30% of the rule requirements were not met.	
			Adjustment \$	4,950
				4F0
				\$50
Violatio	on Even	ts		
		Number of \	/iolation Events 1 77 Number of violation days	
			doily	
			daily weekly	
			monthly	
			quarterly Violation Base Pe	nalty \$50
			semiannual	
			annual	
			single event x	
			One single event is recommended.	
Good F	aith Eff	orts to Com	Ply 0.0% Redu Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	iction \$0
			Extraordinary Extraordinary	
			Ordinary	
			N/A x	
			Notes The Respondent does not meet the good faith criteria for this violation.	
			Violation Sub	ototal \$50
Econon	mic Bene	efit (EB) for	this violation Statutory Limit Te	st
		Estimate	ed EB Amount \$8 Violation Final Penalty	Total \$73
			This violation Final Assessed Penalty (adjusted for li	mits) \$73
1			inis violation i mai Assessed Femalty (adjusted for in	

	E	conomic	Benefit	Wo	rksheet		
Respondent	TRI-COUNTY P	OINT PROPERTY	OWNERS ASSO	CIATIO	N (Tri County Point	t Water System 4)	
Case ID No.	49546						
Reg. Ent. Reference No.	RN101399228						
Media	Public Water S	upply				Percent Interest	Years of
Violation No.	5					reicent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$45	14-Mar-2017	27-Nov-2020	3.71	\$8	n/a	\$8
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	records and calculated fr	d make them imn om the date of th	nediately availat ne investigation	ole for i initially compli	nspection upon red documenting the value.	stem operation and quest by the Executi violation to the estin	ve Director, nated date of
Avoided Costs	ANNU/	ALIZE avoided o	osts before en	tering	item (except for	r one-time avoide	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$45			TOTAL		\$8

	Scree	ening Date				cket No. 2020-0376-PWS-E		PCW
	R	espondent	TRI-COUNTY PO Water System	OINT PROPERT	Y OWNERS A	SSOCIATION (Tri County Point		
	C	ase ID No.	•	7)				Revision 4 (April 2014) sion September 1, 2019
Reg.			RN101399228				r orr norm	sion coptember 1, 2015
			Public Water Su	upply				
		oordinator tion Number	Aaron Vincent	1				
	Viola	Rule Cite(s)	0	20.7	Toy Admin (Code § 290.46(j)		
				•		 Inspection ("CSI") certificate pri construction or any existing serv 		
	Violation	Description	the water p	urveyor has re	ason to belie	ve cross-connections or other pot	ential	
						, the operator stated that there was; however, CSI certificates were		
				ic iii ciio pi ciio	compl			
		•				Raco	Penalty	\$5,000
						Dase	Penalty	\$3,000
>> Env	ironmen	tal, Proper	ty and Hum		Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual						
		Potential				Percent 0.0%		
>>Prog	grammat	ic Matrix						
	F	Falsification	Major	Moderate	Minor	Percent 5.0%		
	<u>L</u>		X			Fercent 5.0%		
	Matrix							
	Notes		100	0% of the rule	requirements	s were not met.		
	L							
						Adjustment	\$4,750	
								\$250
Violatio	on Event	S						
		Number of \	iolation Events	1		84 Number of violation o	lays	
			daily					
			weekly					
			monthly					1252
			quarterly semiannual			Violation Base	Penalty	\$250
			annual					
			single event	Х				
				One single e	event is recon	nmended.		
	L							
Good Fa	aith Effo	rts to Com		0.0%			eduction	\$0
			Extraordinary	Before NOE/NOV	NOE/NOV to ED	PRP/Settlement Offer		
			Ordinary					
			N/A	Х				
				The Responde	ent does not i	meet the good faith criteria for		
			Notes			violation.		
						Violation	Subtotal	\$250
Econom	nic Benef	fit (EB) for	this violation	on		Statutory Limit	Test	
		Estimate	ed EB Amount		\$128	Violation Final Pena	Ity Total	\$363
							•	·
				i nis viol	ation Final <i>I</i>	Assessed Penalty (adjusted fo	r iimits)	\$363

Economic Benefit Worksheet							
• • • • • • • • • • • • • • • • • • •	: TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION (Tri County Point Water System 4)						
Case ID No. Reg. Ent. Reference No.							
	Public Water S					Percent Interest	Years of Depreciation
Violation No.	O .					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		Date Required	i iiiai bacc		2.11.0.1.001.001.00	00010 00100	25 Amount
Item Description							
Delayed Costs							
Équipment				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	44.14 2047	26.7 2024	0.00	\$0	n/a	\$0
Record Keeping System	\$180	14-Mar-2017	26-Jan-2021	3.87	\$35	n/a	\$35
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	14-Mar-2017	27-Nov-2020	3.71	\$93	n/a	\$93
Notes for DELAYED costs	The Record Keeping System delayed cost includes the estimated amount to complete CSI certificates at all locations where a cross-connection or potential contamination hazard may exist, calculated from the date of the investigation initially documenting the violation to the estimated date of compliance. The Other (as needed) delayed cost includes the estimated amount to implement a CSI program to ensure that all service connections are properly inspected, calculated from the date of the investigation initially documenting the violation to the estimated date of compliance.						
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	one-time avoided	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				0.00	\$0	\$0	\$0 \$0
Other (as needed) Notes for AVOIDED costs		<u> </u>		0.00	<u> \$0</u>	\$0	\$0
Approx. Cost of Compliance		\$680			TOTAL		\$128

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEO Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN600622823, RN101398733, Rating Year 2019 which includes Compliance History (CH) components from September 1, 2014, through August 31, 2019.

Classification: SATISFACTORY

Classification: NOT APPLICABLE

Phone: (512) 239-4712

Customer, Respondent, CN600622823, TRI-COUNTY POINT

or Owner/Operator: PROPERTY OWNERS ASSOCIATION

Regulated Entity: RN101398733, Tri County Point

Water System 3

Complexity Points: N/A Repeat Violator: N/A

CH Group: 14 - Other

Location: 14 County Road 480 in Palacios, Jackson County, Texas

TCEQ Region: **REGION 14 - CORPUS CHRISTI**

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

1200028

Compliance History Period: September 01, 2014 to August 31, 2019 Rating Year: 2019 **Rating Date:** 09/01/2019

Date Compliance History Report Prepared: February 27, 2020 Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 27, 2015 to February 27, 2020

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

Site and Owner/Operator History:

Name: Marla Waters

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

Rating: 38.55

Rating: N/A

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

A. Final Orders, court judgments, and consent decrees:

Effective Date: 05/07/2015 ADMINORDER 2014-1590-PWS-E (1660 Order-Agreed Order With Denial)

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.42(e)(5)

Description: Failed to properly cover the hypochlorination solution container to prevent the entrance of contaminants.

Specifically, there was a hole in the top of the hypochlorination solution container.

Classification: Minor

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

> 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(B)(iv) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(D)(ii)

Description: Failed to make water works operation and maintenance records available for review by Commission personnel during the investigation. Specifically, records of the verification of the disinfectant residual analyzer and inspections for the pressure tanks were not being maintained.

Classification: Minor

30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(i)

Description: Failed to properly verify the accuracy of the manual disinfectant residual analyzer at least once every 90 days using chlorine solutions of known concentrations. Specifically, the chlorine solutions being used to verify the accuracy of the meter were expired.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(c)(4)(A)

Description: Failed to monitor the distribution system at least once every seven days. Specifically, the disinfectant residual was being measured at the same location several times before rotating to the next sample site.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.45(b)(1)(C)(iii)

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

Description: Failed to provide two or more pumps having a total capacity of 2.0 gallons per minute ("gpm") per connection at each pump station or pressure plane. Specifically, with 99 connections the Facility must provide at least two service pumps with a capacity of 198 gpm. At the time of the investigation, no service pumps were provided, which is a 100% deficiency.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.45(b)(1)(C)(ii)

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

Description: Failed to provide a total storage capacity of 200 gallons per connection. Specifically, with 99 connections the Facility must provide a total storage capacity of 19,800 gallons. At the time of the investigation, no storage was provided which is a 100% deficiency.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(4)

Description: Failed to maintain all distribution system lines, storage and pressure maintenance facilities, water treatment units, and all related appurtenances in a watertight condition. Specifically, there was a small leak coming from the access hatch on the pressure tank at the section 3 well site.

2 Effective Date: 01/31/2018 ADMINORDER 2016-1386-PWS-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(4)(A)

30 TAC Chapter 290, SubChapter F 290,110(f)(3)

Description: DLQOR MR 1Q2016 - The system failed to monitor and/or report distribution disinfectant residuals to the

TCEQ for the 1st quarter of 2016 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(4)(A)

30 TAC Chapter 290, SubChapter F 290.110(f)(3)

Description: DLQOR MR 4Q2015 - The system failed to monitor and/or report distribution disinfectant residuals to the

TCEQ for the 4th quarter of 2015 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(4)(A)

30 TAC Chapter 290, SubChapter F 290.110(f)(3)

 ${\tt Description:} \quad {\tt DLQOR} \; {\tt MR} \; {\tt 3Q2015} \; {\tt -} \; {\tt The} \; {\tt system} \; {\tt failed} \; {\tt to} \; {\tt monitor} \; {\tt and/or} \; {\tt report} \; {\tt distribution} \; {\tt distribution}$

TCEQ for the 3rd quarter of 2015 within the required timeline.

Classification: Moderate

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

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(i)(6)

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 01/01/2015 to 06/30/2015.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 3Q2015 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 disinfectant monitoring and reporting violation during the 3rd quarter of 2015. 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 IN MR PN 2nd 6M2014 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 initial lead and copper monitoring and reporting violation for the six-month monitoring period from 07/01/2014 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 IN MR PN 1st 6M2014 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 initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2014 to 06/30/2014.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 4Q2015 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 disinfectant monitoring and reporting violation during the 4th quarter of 2015.

3 Effective Date: 04/26/2019 ADMINORDER 2018-0699-PWS-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.106(e)

Description: CY MR 3Y2017 - The system failed to monitor and/or report cyanide levels to the TCEQ for the triennial monitoring period from 01/01/2015 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.107(e)

Description: SOC 504, 531, Group SOC5 MR 4Q2017 - The system failed to monitor and/or report synthetic organic contaminants (method Group SOC5, 504, 531) levels to the TCEQ for the quarterly monitoring period from 10/01/2017 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.107(e)

Description: SOC MR 3Q2017 - The system failed to monitor and/or report synthetic organic contaminants levels to the TCEQ for the quarterly monitoring period from 07/01/2017 to 09/30/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.107(e)

Description: SOC MR 2Q2017 - The system failed to monitor and/or report synthetic organic contaminants levels to the TCEQ for the quarterly monitoring period from 04/01/2017 to 06/30/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.106(e)

Description: MTL/MIN MR YR2017 - The system failed to monitor and/or report metal/mineral levels to the TCEQ for the annual monitoring period from 01/01/2017 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.106(e)

Description: NO3 MR YR2017 - The system failed to monitor and/or report nitrate levels to the TCEQ for the annual monitoring period from 01/01/2017 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.108(e)

Description: RAD MR YR2017 - The system failed to monitor and/or report radionuclide levels to the TCEQ for the annual monitoring period from 01/01/2017 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.107(e)

Description: SOC 515, Group SOC5 MR 1Q2017 - The system failed to monitor and/or report synthetic organic contaminants (method 515, Group SOC5) levels to the TCEQ for the quarterly monitoring period from 01/01/2017 to 03/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.107(e)

Description: VOC MR 4Q2017 - The system failed to monitor and/or report volatile organic contaminants levels to the TCEQ for the quarterly monitoring period from 10/01/2017 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.107(e)

Description: VOC MR 3Q2017 - The system failed to monitor and/or report volatile organic contaminants levels to the TCEQ for the quarterly monitoring period from 07/01/2017 to 09/30/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.115(e)(1)

Description: DBP2 MR YR2017 - This system failed to monitor and/or report disinfectant byproduct levels in its distribution system to the TCEQ for the annual monitoring period from 01/01/2017 to 12/31/2017.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter H 290.271(b)

30 TAC Chapter 290, SubChapter H 290.274(a)

30 TAC Chapter 290, SubChapter H 290.274(c)

Description: CCR 2016 - The system failed to provide the Consumer Confidence Report (CCR) for 2016 to its bill-paying customers and/or the TCEQ by July 1st of the following year.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: SOC 515, Group SOC5 MR PN 1Q2017 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 synthetic organic contaminants (group SOC5, method 515)

monitoring and reporting violation for the quarterly monitoring period from 01/01/2017 to 03/31/2017.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1 January 31, 2019 (1540650) Item 2 December 19, 2019 (1617343)

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

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

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEO Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN600622823, RN101399228, Rating Year 2019 which includes Compliance History (CH) components from September 1, 2014, through August 31, 2019.

Classification: SATISFACTORY

Classification: NOT APPLICABLE

Rating: 38.55

Rating: N/A

Customer, Respondent, CN600622823, TRI-COUNTY POINT

or Owner/Operator: PROPERTY OWNERS ASSOCIATION

Regulated Entity: RN101399228, Tri County Point

Water System 4

Complexity Points: N/A Repeat Violator: N/A

CH Group: 14 - Other

Location: approximately 936 feet east of Porpoise Drive on Sea Horse Drive near Palacios, Jackson County, Texas

TCEQ Region: **REGION 14 - CORPUS CHRISTI**

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

1200029

Compliance History Period: September 01, 2014 to August 31, 2019 Rating Year: 2019 **Rating Date:** 09/01/2019

Date Compliance History Report Prepared: February 18, 2020 Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 18, 2015 to February 18, 2020

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

Name: Marla Waters **Phone:** (512) 239-4712

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:

Effective Date: 05/07/2015 ADMINORDER 2014-1590-PWS-E (1660 Order-Agreed Order With Denial)

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.42(e)(5)

Description: Failed to properly cover the hypochlorination solution container to prevent the entrance of contaminants.

Specifically, there was a hole in the top of the hypochlorination solution container.

Classification: Minor

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

> 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(B)(iv) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(D)(ii)

Description: Failed to make water works operation and maintenance records available for review by Commission personnel during the investigation. Specifically, records of the verification of the disinfectant residual analyzer and inspections for the pressure tank were not being maintained.

Classification: Minor

30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(i)

Description: Failed to properly verify the accuracy of the manual disinfectant residual analyzer at least once every 90 days using chlorine solutions of known concentrations. Specifically, the chlorine solutions being used to verify the accuracy of the meter were expired.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(c)(4)(A)

Description: Failed to monitor the distribution system at least once every seven days. Specifically, the disinfectant residual was being measured at the same location several times before rotating to the next sample site.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.45(b)(1)(C)(ii)

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

Description: Failed to provide a total storage capacity of 200 gallons per connection. Specifically, with 60 connections the Facility must provide a total storage capacity of 12,000 gallons. At the time of the investigation, no storage was provided which is a 100% deficiency.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.45(b)(1)(C)(iii)

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

Description: Failed to provide two or more pumps having a total capacity of 2.0 gallons per minute ("gpm") per connection at each pump station or pressure plane. Specifically, with 60 connections the Facility must provide at least two service pumps with a capacity of 120 gpm. At the time of the investigation, no service pumps were provided, which is a 100% deficiency.

2 Effective Date: 04/26/2019 ADMINORDER 2018-0699-PWS-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.106(e)

 $\hbox{Description:}\quad \hbox{CY MR 3Y2017 - The system failed to monitor and/or report cyanide levels to the TCEQ for the triennial}$

monitoring period from 01/01/2015 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.106(e)

Description: NO3 MR YR2017 - The system failed to monitor and/or report nitrate levels to the TCEQ for the annual

monitoring period from 01/01/2017 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.107(e)

Description: VOC MR YR2017 - The system failed to monitor and/or report volatile organic contaminants levels to the

TCEQ for the annual monitoring period from 01/01/2017 to 12/31/2017 within the required timeline.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.115(e)(1)

Description: DBP2 MR YR2017 - This system failed to monitor and/or report disinfectant byproduct levels in its distribution system to the TCEQ for the annual monitoring period from 01/01/2017 to 12/31/2017.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.117(h)

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

Description: LCR RD MR 3Y2017 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the triennial reduced monitoring period from 01/01/2015 to 12/31/2017 within the required timeline.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.117(j)

Description: LCR LCN 06/01/2014 to 09/30/2014- 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 reduced monitoring period from 01/01/2014 to 12/31/2014.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter H 290.271(b)

30 TAC Chapter 290, SubChapter H 290.274(a)

30 TAC Chapter 290, SubChapter H 290.274(c)

Description: CCR 2016 - The system failed to provide the Consumer Confidence Report (CCR) for 2016 to its bill-paying customers and/or the TCEQ by July 1st of the following year.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 2Q2016 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 disinfectant monitoring and reporting violation during the second quarter of 2016.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 1Q2016 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 disinfectant monitoring and reporting violation during the first quarter of 2016. Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 4Q2015 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 disinfectant monitoring and reporting violation during the fourth quarter of 2015.

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 3Q2015 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 disinfectant monitoring and reporting violation during the third quarter of 2015.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

 Item 1
 May 30, 2019
 (1569965)

 Item 2
 December 19, 2019
 (1617410)

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

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

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
TRI-COUNTY POINT PROPERTY	§	TEAAS COMMISSION ON
OWNERS ASSOCIATION	§	
RN101398733 AND RN101399228	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2020-0376-PWS-E

On	, the Texas Commission on Environmental Quality ("the
Commission" or "TCEQ") co	onsidered this agreement of the parties, resolving an enforcement
action regarding TRI-COUN	NTY POINT PROPERTY OWNERS ASSOCIATION (the
"Respondent") under the au	thority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive
Director of the TCEQ, throu	igh 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 public water supplies (the "Facilities") at the locations below. The Facilities provide water for human consumption and serve at least 25 people per day for at least 60 days per year. As such, the Facilities are public water systems as defined in 30 Tex. Admin. Code § 290.38(71).
 - a. Tri County Point Water System 3, located at 14 County Road 480 in Palacios, Jackson County, Texas, that has approximately 145 service connections ("System 3"); and
 - b. Tri County Point Water System 4, located approximately 936 feet east of Porpoise Drive on Sea Horse Drive near Palacios, Jackson County, Texas, that has approximately 81 service connections ("System 4").

- 2. During an investigation conducted on December 3, 2019 through December 18, 2019 at System 3, an investigator documented that:
 - a. The Facility is required to provide a total storage capacity of 29,000 gallons. However, none was provided, indicating 100% deficiency.
 - b. The Facility is required to provide a service pump capacity of 290 gallons per minute ("gpm"). However, no service pumps were provided, indicating 100% deficiency.
 - c. Records for the dates that dead-end mains were flushed, backflow prevention device programs, the results of inspections for all pressure maintenance facilities, and copies of the Customer Service Inspection ("CSI") reports were not maintained on-site for review.
 - d. The Respondent did not have CSI certificates completed at new connections.
 - e. The Customer Service Agreement form lacked provisions for proper enforcement to ensure that unacceptable plumbing practices are not permitted.
 - f. The Respondent did not make available a distribution map.
 - g. The Respondent drilled into a capped potable waterline and connected a water hose. Furthermore, the hose was laying on the ground providing a potential indirect cross-connection at the wastewater treatment plant.
- 3. During an investigation conducted on December 3, 2019 at System 4, an investigator documented that:
 - a. Records for the dates that dead-end mains were flushed, backflow prevention device programs and the results of inspections for all pressure maintenance facilities were not maintained on-site for review.
 - b. The operator stated that there were new homes built in the previous three years; however, CSI certificates were not completed.
 - c. The Respondent did not make available a distribution map.
 - d. The Facility is required to provide a total storage capacity of 16,200 gallons. However, none was provided, indicating 100% deficiency.
 - e. The Facility is required to provide a service pump capacity of 162 gpm. However, no service pumps were provided, indicating 100% deficiency.
 - f. The Customer Service Agreement form lacked provisions for proper enforcement to ensure that unacceptable plumbing practices are not permitted
- 4. The Executive Director recognizes that on December 18, 2019 the Respondent disconnected and removed the hose and capped the potable waterline at the System 3 wastewater treatment plant.

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. HEALTH & SAFETY CODE ch. 341 and the rules of the TCEQ.
- 2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to provide a total storage capacity of 200 gallons per connection, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(C)(ii), Tex. Health & Safety Code § 341.0315(c) and TCEQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.c.ii.
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to provide two or more service pumps having a total capacity of 2.0 gpm per connection at each pump station or pressure plane, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(C)(iii), Tex. Health & Safety Code § 341.0315(c) and TCEQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.c.i.
- 4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request, in violation of 30 Tex. Admin. Code § 290.46(f)(2), (f)(3)(A)(iv), (f)(3)(B)(v), (f)(3)(D)(ii), and (f)(3)(E)(iv) and TCEQ Agreed Order Docket No. 2014-1590-PWS-E, Ordering Provision No. 2.a.i.
- 5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to complete a CSI certificate prior to providing continuous water service to new construction or any existing service when the water purveyor has reason to believe cross-connections or other potential contamination hazards exists, in violation of 30 Tex. ADMIN. CODE § 290.46(j).
- 6. As evidenced by Finding of Fact No. 2.e, the Respondent failed to adopt an adequate plumbing ordinance, regulations, or service agreements with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in violation of 30 Tex. ADMIN. CODE § 290.46(i).
- 7. As evidenced by Finding of Fact No. 2.f, the Respondent failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in violation of 30 Tex. Admin. Code § 290.46(n)(2).
- 8. As evidenced by Finding of Fact No. 2.g, the Respondent failed to ensure additional protection was provided at all residences or establishments where an actual or potential contamination hazard exists in the form of an air gap or backflow prevention assembly, as identified in 30 Tex. Admin. Code § 290.47(f), in violation of 30 Tex. Admin. Code § 290.44(h)(1)(A).
- 9. As evidenced by Finding of Fact No. 3.a, the Respondent failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request, in violation of 30 Tex. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(iv), (f)(3)(B)(v), and (f)(3)(D)(ii).

- 10. As evidenced by Finding of Fact No. 3.b, the Respondent failed to complete a CSI certificate prior to providing continuous water service to new construction or any existing service when the water purveyor has reason to believe cross-connections or other potential contamination hazards exists, in violation of 30 Tex. ADMIN. CODE § 290.46(j).
- 11. As evidenced by Finding of Fact No. 3.c, the Respondent failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in violation of 30 Tex. Admin. Code § 290.46(n)(2).
- As evidenced by Finding of Fact No. 3.d, the Respondent failed to provide a total storage capacity of 200 gallons per connection, in violation of 30 TEX. ADMIN. CODE § 290.45(b)(1)(C)(ii) and TEX. HEALTH & SAFETY CODE § 341.0315(c).
- As evidenced by Finding of Fact No. 3.e, the Respondent failed to provide two or more service pumps having a total capacity of 2.0 gpm per connection at each pump station or pressure plane, in violation of 30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(iii) and Tex. HEALTH & SAFETY CODE § 341.0315(c).
- 14. As evidenced by Finding of Fact No. 3.f, the Respondent failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connection nor other unacceptable plumbing practices are permitted, in violation of 30 Tex. ADMIN. CODE § 290.46(i).
- 15. Pursuant to Tex. Health & Safety Code § 341.049(a), 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.
- 16. An administrative penalty in the amount of \$53,873 is justified by the facts recited in this Order, and considered in light of the factors set forth in Tex. Health & Safety Code \$341.049(b). 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, \$50,273 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 Respondents fail 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 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. 16 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: TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION, Docket No. 2020-0376-PWS-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 at System 3:
 - a. Within 30 days after the effective date of this Order:
 - i. Compile and maintain properly completed water works operation and maintenance records, including records for the dates that dead-end mains were flushed, backflow prevention device programs, results of inspections for all pressure maintenance facilities and copies of the CSI reports, in accordance with 30 Tex. Admin. Code § 290.46;
 - ii. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in accordance with 30 TEX. ADMIN. CODE § 290.46; and
 - iii. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that CSI certificates are completed prior to providing continuous water service to new construction, on any existing service either when the water purveyor has reason to believe that cross-connections or other potential contaminant hazards exist, or after any material improvements, corrections, or additions to the private water distribution facilities, in accordance with 30 Tex. Admin. Code § 290.46.
 - b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.f below to demonstrate compliance with Ordering Provision Nos. 2.a.i through 2.a.iii.

- c. Within 90 days after the effective date of this Order:
 - i. Complete CSI certificates for all existing locations at which the water purveyor has reason to believe cross-connections or other potential contamination hazards exist, in accordance with 30 Tex. ADMIN. CODE § 290.46; and
 - ii. Adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in accordance with 30 Tex. Admin. Code § 290.46.
- d. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.f below to demonstrate compliance with Ordering Provision Nos. 2.c.i and 2.c.ii.
- e. Within 180 days after the effective date of this Order:
 - i. Provide a total storage capacity of at least 200 gallons per connection, in accordance with 30 TEX. ADMIN. CODE § 290.45; and
 - ii. Provide two or more service pumps having a total capacity of at least 2.0 gpm per connection, in accordance with 30 Tex. ADMIN. CODE § 290.45.
- f. Within 195 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.f below to demonstrate compliance with Ordering Provision Nos. 2.e.i and 2.e.ii.
- 3. The Respondent shall undertake the following technical requirements at System 4:
 - a. Within 30 days after the effective date of this Order:
 - i. Compile and maintain properly completed water works operation and maintenance records, including records for the dates that dead-end mains were flushed, backflow prevention device programs and the results of inspections for all pressure maintenance facilities, in accordance with 30 Tex. Admin. Code § 290.46;
 - ii. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in accordance with 30 Tex. ADMIN. CODE § 290.46; and
 - iii. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that CSI certificates are completed prior to providing continuous water service to new construction, on any existing service either when the water purveyor has reason to believe that cross-connections or other potential contaminant hazards exist, or after

any material improvements, corrections, or additions to the private water distribution facilities, in accordance with 30 Tex. Admin. Code § 290.46.

- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.f below to demonstrate compliance with Ordering Provision Nos. 3.a.i through 3.a.iii.
- c. Within 90 days after the effective date of this Order:
 - i. Complete CSI certificates for all existing locations at which the water purveyor has reason to believe cross-connections or other potential contamination hazards exist, in accordance with 30 Tex. ADMIN. CODE § 290.46; and
 - ii. Adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in accordance with 30 Tex. Admin. Code § 290.46.
- d. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.f below to demonstrate compliance with Ordering Provision Nos. 3.c.i and 3.c.ii.
- e. Within 180 days after the effective date of this Order:
 - i. Provide a total storage capacity of at least 200 gallons per connection, in accordance with 30 TEX. ADMIN. CODE § 290.45; and
 - ii. Provide two or more service pumps having a total capacity of at least 2.0 gpm per connection, in accordance with 30 Tex. ADMIN. CODE § 290.45.
- f. Within 195 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. 3.e.i and 3.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."

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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 Corpus Christi Regional Office Texas Commission on Environmental Quality 6300 Ocean Drive, Suite 1200 Corpus Christi, Texas 78412-5839

- 4. All relief not expressly granted in this Order is denied.
- 5. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 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

TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION DOCKET NO. 2020-0376-PWS-E Page 9

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.

TŔI-COUNTY POINT PROPERTY OWNERS ASSOCIATION DOCKET NO. 2020-0376-PWS-E Page 10

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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. Anale (Printed or typed) Title President of Board of Title		·
For the Elecutive Director 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. Date Date	For the Commission	Date
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Signature Date D	 Greater scrutiny of any permit applications s Referral of this case to the Attorney General's additional penalties, and/or attorney fees, or Increased penalties in any future enforcement Automatic referral to the Attorney General's 	s Office for contempt, injunctive relief, to a collection agency; nt actions; Office of any future enforcement actions; and
Cynthia Monison President of Board of Name (Printed or typed) Authorized Representative of TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION	In addition, any falsification of any compliance do	cuments may result in criminal prosecution.
Authorized Representative of TRI-COUNTY POINT PROPERTY OWNERS ASSOCIATION	Signature Signature	July 1 2021 Date
	Name (Printed or typed) Authorized Representative of	President of Board of Title Director
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