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: Hancock Plaza I & II, 18200 Farm-to-Market Road 306, Canvon Lake, Comal 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:** May 14, 2021 **Comments Received:** No

Penalty Information

Total Penalty Assessed: \$13,914 Total Paid to General Revenue: \$13,914 Total Due to General Revenue: \$0 Payment Plan: N/A Compliance History Classifications: Person/CN - High 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:** June 1, 2020 through July 7, 2020 **Date(s) of NOE(s):** September 1, 2020

Violation Information

1. Failed to provide the Facility's three pressure tanks with an easily readable pressure gauge [30 Tex. ADMIN. CODE § 290.43(d)(2)].

2. Failed to calibrate the Facility's well meter at least once every three years [30 Tex. ADMIN. CODE § 290.46(s)(1).

3. Failed to have all backflow prevention assemblies tested upon installation and on an annual basis by a recognized backflow prevention assembly tester and certify that they are operating within specifications [30 TEX. ADMIN. CODE § 290.44(h)(4)].

4. Failed to monitor the disinfectant residual at representative locations throughout the distribution system at least once every seven days [30 TEX. ADMIN. CODE \S 290.110(c)(4)(A)].

5. Failed to maintain at the public water system accurate and up-to-date detailed asbuilt plans or record drawings and specifications for each treatment plant, pump station, and storage tank until the Facility is decommissioned [30 TEX. ADMIN. CODE § 290.46(n)(1)].

6. Failed to keep on file copies of well completion data, as defined in 30 TEX. ADMIN. CODE § 290.41(c)(3)(A), for as long as the well remains in service [30 TEX. ADMIN. CODE § 290.46(n)(3)].

7. 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)(B)(v), and (f)(3)(E)(iv)].

8. Failed to protect all well units with an intruder-resistant fence with a lockable gate or enclose the well in a locked, ventilated well house to exclude possible contamination or damage to the facilities by trespassers [30 TEX. ADMIN. CODE § 290.41(c)(3)(O) and TCEQ Agreed Order Docket No. 2015-0950-PWS-E, Ordering Provision No. 2.e.iv].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures:

a. On August 6, 2020, a photograph and invoice were submitted indicating that the well meter has been replaced.

b. On August 12, 2020, a photograph and invoice were submitted indicating that all pressure tanks have been equipped with a pressure gauge.

c. On September 23, 2020:

i. Provided a locked, ventilated well house to protect the Facility's well; and

ii. Provided copies of Customer Service Inspection reports.

Technical Requirements:

The Order will require the Respondent to:

a. Within 30 days:

i. Monitor the disinfectant residual at representative locations throughout the distribution system at sites designated in the Facility's monitoring plan at least once every seven day. This provision will be satisfied upon three months of compliant monitoring;

ii. Compile and maintain properly completed water works operation and maintenance records, including records of backflow prevention device programs; and

iii. Update the Facility's operational guidance and conduct employee training to ensure that all backflow prevention assemblies are tested upon installation and on an annual basis by a recognized backflow prevention assembly tester and certified that they are operating within specifications.

b. Within 45 days, submit written certification to demonstrate compliance with a.ii. and a.iii.

c. Within 60 days, ensure that all backflow prevention assemblies are tested upon installation and on an annual basis by a recognized backflow prevention assembly tester and certify that they are operating within specifications, including but not limited to the backflow prevention device at the carbonated soda dispenser.

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

e. Within 90 days:

i. Compile and maintain at the public water system accurate and up-to-date detailed asbuilt plans or record drawings and specifications for each treatment plant, pump station, and storage tank; and

ii. Keep on file copies of well completion data for the well.

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

g. Within 135 days, submit written certification to demonstrate compliance with a.i.

Contact Information

TCEQ Attorney: N/A **TCEQ Enforcement Coordinator:** Epifanio Villarreal, Enforcement Division, Enforcement Team 8, MC R-14, (361) 825-3421; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548 **Respondent:** Meenaz Vadhwani, Owner, VADHWANI ENTERPRISES INC., 2106 Old Sattler Road, Canyon Lake, Texas 78133 **Respondent's Attorney:** N/A

RECOMMENDED	Policy R	Pe Revision 4 (April 2014)	nalty Cal	culatio	n Worksł	neet (PC	•	Revision March 26, 20)14
DATES	Assigned	8-Sep-2020	Screening 10	Con 2020	EDA Dur		1		
	PCW	10-Sep-2020		J-Sep-2020	EPA Due				
RESPO		TY INFORMATI		(DC)M(N=1)					
Reg	g. Ent. Ref. No.		ERPRISES INC. (PCW NO. I)					
Facili	ty/Site Region	13-San Antonio			Major/N	linor Source	Minor		
CASE I	NFORMATION								
En	f./Case ID No.				No.	of Violations			
Med		2020-1183-PWS Public Water Sup			Governmen	Order Type t/Non-Profit			
Wiec	Multi-Media		, pry				Epifanio Villarr	eal	
Adr	nin. Penalty \$ I	imit Minimum	\$50 M a	aximum	\$1,000	EC's Team	Enforcement T	eam 8	
	, , , , , , , , , , , , , , , , , , ,				· · ·				
			J		tion Section	on			
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation ba	ise penalt	ies)		Subtotal 1	\$2,10	00
ADJU	STMENTS (+	/-) TO SUBTO	DTAL 1						
	Subtotals 2-7 are ob Compliance Hi	otained by multiplying	the Total Base Pena	alty (Subtotal 1) 10.0%	by the indicated p Adjustment		tals 2, 3, & 7	\$21	10
			t for one agreed		,]	·····	
	Notes		eduction for High			or naointy.			
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$	\$0
]	•	
	Notes	The Re	spondent does r	not meet the	culpability crite	eria.			
	Good Eaith Eff	ort to Comply T	otal Adjustmor	ate			Subtotal 5	-\$21	10
	Good Faith En	or to comply h		115			Subiolal S	-921	10
	Economic Ben	efit		0.0%	Enhancement*		Subtotal 6	\$	\$0
		Total EB Amounts Cost of Compliance	\$1,578		at the Total EB \$	Amount			
	Estimated	cost of compliance	\$5,000						
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$2,10	00
OTHE	R FACTORS A	AS JUSTICE M	AY REQUIR	E	0.0%		Adjustment	\$	\$0
Reduces of	or enhances the Final	Subtotal by the indic	ated percentage.				1		
	Notes								
						51 1 5			
						Final Per	nalty Amount	\$2,10	00
STATU	JTORY LIMIT		JT			Final Asse	essed Penalty	\$2,10	00
DEFE	PRAI			1	0.0%	Reduction	Adjustment	\$	\$0
		nalty by the indicated	l percentage.		0.078	nouconon		4	
	Notes	No.c	leferral is recom	mended for	Findings Orders	S			
	Notes	1000							
ΡΔΥΛ	BLE PENALT	v						\$2,10	<u>)</u> 0
IAIA								ψ Ζ , ΙΟ	

		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	0	0%	
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%	
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
	Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%	
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%	
		Environmental management systems in place for one year or more	No	0%	
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
	011101	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	rcentage (Sub	ototal 2)	209
R	epeat Violator		rcentage (Sub	ototal 3)	0%
				/	
C	ompliance Hist	ory Person Classification (Subtotal 7)			
C	ompliance Hist High Perf	ory Person Classification (Subtotal 7) Ormer Adjustment Per	rcentage (Sub	ototal 7)	-10
		ormer Adjustment Per	rcentage (Sub	ototal 7)	-10
	High Perf	ormer Adjustment Per		ototal 7) [-10
> C(High Perf ompliance Hist Compliance History Notes	ormer Adjustment Per ory Summary Enhancement for one agreed order containing a denial of liability. Reduction for H	High Performer		-10º

Compliance History Worksheet Compliance History Site Enhancement (Subtotal 2)

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

the current enforcement action (*number of NOVs meeting criteria*)

Respondent VADHWANI ENTERPRISES INC. (PCW No.1)

Docket No. 2020-1183-PWS-E

Case ID No. 50725

Screening Date 10-Sep-2020

Reg. Ent. Reference No. RN106241375

Media Public Water Supply

Enf. Coordinator Epifanio Villarreal

Number of...

>>

Component

NOVs

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

Adjust.

0%

Number

0

		ening Date			ket No. 2020-1183-PWS-E	PCW
		Respondent Case ID No.	VADHWANI ENTERPRISES IN	IC. (PCW No.1)	Policy Revision 4 (April 2014)
Reg.			RN106241375			PCW Revision March 26, 2014
5		Media	Public Water Supply			
		Coordinator ation Number	Epifanio Villarreal			
	VIOI			41(-)(2)(0) -		2015
		Rule Cite(S)			nd TCEQ Agreed Order Docket No g Provision No. 2.e.iv	. 2015-
	Violatio	n Description	or enclose the well in a contamination or damage to	locked, venti the facilities	uder-resistant fence with a lockab lated well house to exclude possib by trespassers. Specifically, the w ell house or an intruder-resistant f	<mark>vell was</mark>
					Base I	Penalty \$1,000
>> Env	vironme	ntal, Propei	rty and Human Health	Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual				
		Potential	х		Percent 15.0%	
>>Pro	aramma	tic Matrix				
		Falsification	Major Moderate	Minor		
					Percent 0.0%	
	Matrix Notes	Failure to prot	ect the well could expose per exceed levels p		the Facility to contaminants whic uman health.	h would
					Adjustment	\$850
						\$150
Violati	on Even	ts				
		Number of V	/iolation Events 14		1257 Number of violation da	ys
			dailyweeklymonthlyquarterlyxsemiannualannualsingle event		Violation Base I	Penalty \$2,100
			5		I from the effective date of TCEQ , 22, 2016, to August 31, 2019.	Agreed
Good F	aith Eff	orts to Com				duction \$210
			Before NOE/NOV	NOE/NOV to EE	DPRP/Settlement Offer	
			Ordinary	x		
			N/A			
			Notes The Respond		compliance on September 23, 2020.	
					Violation S	ubtotal \$1,890
Econor	mic Bene	efit (EB) for	this violation		Statutory Limit T	est
			ed EB Amount	\$1,578	Violation Final Penalt	
		Estimate		<u> </u>		
			This viol	ation Final A	ssessed Penalty (adjusted for	limits) \$2,100

	E	conomic	Benefit	Wo	rksheet		
Respondent	VADHWANI EN	ITERPRISES INC.	(PCW No.1)				
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S						Years of
		uppiy				Percent Interest	Depreciation
Violation No.	1						•
						5.0	15
	I tem Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
p							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$5,000	22-Mar-2016	23-Sep-2020	4.51	\$75	\$1,503	\$1,578
Engineering/Construction	\$3,000	22 100 2010	23 300 2020	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
	The delayed (cost includes the (kable building
Notes for DELAYED costs	for the well, c		e effective date dat	of TCEC	mpliance.	ocket No. 2015-0950)-PWS-E to the
Notes for DELAYED costs Avoided Costs	for the well, c	alculated from the	e effective date dat	of TCEC	mpliance.	ocket No. 2015-0950)-PWS-E to the
	for the well, c	alculated from the	e effective date dat	of TCEC	mpliance.	ocket No. 2015-0950)-PWS-E to the
Avoided Costs	for the well, c	alculated from the	e effective date dat	of TCEC e of con tering	npliance. item (except for \$0 \$0	ocket No. 2015-0950 one-time avoide \$0 \$0)-PWS-E to the
Avoided Costs Disposal Personnel	for the well, c	alculated from the	e effective date dat	of TCEC e of con tering 0.00 0.00 0.00	npliance. item (except for \$0 \$0 \$0 \$0	concertime avoider solutions \$0 \$0 \$0 \$0 \$0 \$0	D-PWS-E to the d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	for the well, c	alculated from the	e effective date dat	of TCEC e of cor tering 0.00 0.00 0.00 0.00	npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	concertime avoider cone-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	D-PWS-E to the d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	for the well, c	alculated from the	e effective date dat	of TCE(e of cor 0.00 0.00 0.00 0.00 0.00	npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	ocket No. 2015-0950 • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0)-PWS-E to the \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	for the well, c	alculated from the	e effective date dat	of TCEC e of cor 0.00 0.00 0.00 0.00 0.00 0.00 0.00	npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ocket No. 2015-0950 one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	0-PWS-E to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	for the well, c	alculated from the	e effective date dat	of TCE(e of cor 0.00 0.00 0.00 0.00 0.00	npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	ocket No. 2015-0950 • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0)-PWS-E to the \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	for the well, c	alculated from the	e effective date dat	of TCEC e of cor 0.00 0.00 0.00 0.00 0.00 0.00 0.00	npliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ocket No. 2015-0950 one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	D-PWS-E to the s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

DATES Assigned 8-Sep-2020	nber 1, 2019
DCW/ 10 Can 2020 Canading 10 Can 2020 EDA Dua	
PCW 10-Sep-2020 Screening 10-Sep-2020 EPA Due	
RESPONDENT/FACILITY INFORMATION Respondent VADHWANI ENTERPRISES INC. (PCW No. 2)	
Reg. Ent. Ref. No. RN106241375	
Facility/Site Region 13-San Antonio Major/Minor Source Minor	
CASE INFORMATION	
Enf./Case ID No. 50725 Docket No. 2020-1183-PWS-E Order Type Findings	_
Media Program(s) Public Water Supply Government/Non-Profit No	
Multi-Media Enf. Coordinator Epifanio Villarreal EC's Team Enforcement Team 8	
Admin. Penalty \$ Limit Minimum \$50 Maximum \$5,000	
Penalty Calculation Section	
TOTAL BASE PENALTY (Sum of violation base penalties) Subtotal 1	\$12,100
ADJUSTMENTS (+/-) TO SUBTOTAL 1	
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. Compliance History 10.0% Adjustment Subtotals 2, 3, & 7	\$1,210
Notes Enhancement for one agreed order containing a denial of liability. Reduction for High Performer Classification.	+-/
Reduction for High Performer Classification.	
Culpability No 0.0% Enhancement Subtotal 4	\$0
Notes The Respondent does not meet the culpability criteria.	
Good Faith Effort to Comply Total Adjustments Subtotal 5	-\$1,537
Economic Benefit 0.0% Enhancement* Subtotal 6	\$0
Total EB Amounts\$74*Capped at the Total EB \$ AmountEstimated Cost of Compliance\$1,018	
SUM OF SUBTOTALS 1-7 Final Subtotal	\$11,773
OTHER FACTORS AS JUSTICE MAY REQUIRE 0.3% Adjustment Reduces or enhances the Final Subtotal by the indicated percentage.	\$41
Notes Enhancement to capture the avoided cost of compliance associated with Violation Nos. 3 and 4.	
Final Penalty Amount	\$11,814
STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty	\$11,814
DEFERRAL 0.0% Reduction Adjustment	\$0
Reduces the Final Assessed Penalty by the indicated percentage.	
Notes No deferral is recommended for Findings Orders.	
PAYABLE PENALTY	\$11,814

		Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%	
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%	
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%	
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
	Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%	
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%	
				a a (
		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	rcentage (Sub	total 2)	20%
>> Re	peat Violator	(Subtotal 3)			
	N/A	Adjustment Per	rcentage (Sub	total 3)	0%
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)			
	High Perf	ormer Adjustment Per	rcentage (Sub	total 7)	-10%
>> Co	mpliance Hist	ory Summary			
	Compliance History Notes	Enhancement for one agreed order containing a denial of liability. Reduction for H Classification.	High Performer		
>> Fin:	al Compliance	Total Compliance History Adjustment Percentage (S History Adjustment	Subtotals 2,	3, & 7)	10%
		Final Adjustment Percent	age *capped a	at 100%	10%
					ı

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

the current enforcement action (number of NOVs meeting criteria)

Reg. Ent. Reference No. RN106241375 Media Public Water Supply

Respondent VADHWANI ENTERPRISES INC. (PCW No. 2)

Enf. Coordinator Epifanio Villarreal

Other written NOVs

Screening Date 10-Sep-2020

Case ID No. 50725

Component Number of...

NOVs

Compliance History Worksheet >> Compliance History Site Enhancement (Subtotal 2)

Docket No. 2020-1183-PWS-E

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

Adjust.

0%

0%

PCW

Number

0

0

		ening Date		Docket No. 2020-1183-PWS-E	PCW
		Respondent Case ID No.	VADHWANI ENTERPRISES I	NC. (PCW No. 2)	Policy Revision 4 (April 2014) PCW Revision September 1, 2019
Reg.		ference No.			PCW Revision September 1, 2019
			Public Water Supply		
		Coordinator ation Number	Epifanio Villarreal		
	, in the second s	Rule Cite(s)			
		Rule ene(3)	30 T	Fex. Admin. Code § 290.43(d)(2)	
				acility's three pressure tanks with an easily rea	
	Violatio	n Description	pressure gauge. Specifica	Ily, only one of the three pressure tanks was e with a pressure gauge.	quipped
				mar a pressure gaage.	
				Base	e Penalty \$5,000
>> Env	vironme	ntal, Proper	ty and Human Health Harm	n Matrix	
		Release	Major Moderate	Minor	
OR		Actual			
		Potential	X	Percent 15.0%	
>>Pro	gramma	tic Matrix	Majan Madanaka	Minou	
		Falsification	Major Moderate	Minor Percent 0.0%	
			' <u> </u>		
	Matrix			levices and pressure gauges could result in exe ed by the Facility to contaminants which would	
	Notes	pressurizatio		tective of human health.	exceed
					±4.250
				Adjustment	\$4,250
					\$750
Violati	on Even	ts			
		Number of \	/iolation Events 6	72 Number of violation	davs
			daily weekly	_	
			monthly x		
			quarterly	Violation Base	e Penalty \$4,500
			semiannual annual	-	
			single event		
				wo pressure tanks x three monthly events), ca , 2020, to the compliance date, August 12, 20.	
Good F	aith Effe	orts to Com	ply 25.0% Before NOE/NOV		Reduction \$1,125
			Extraordinary		
			Ordinary x		
			N/A		
			Notes The Respo	ondent achieved compliance on August 12, 2020.	
				2020.	
				Violation	Subtotal \$3,375
Econor	nic Bene	efit (EB) for	this violation	Statutory Limit	Test
			ed EB Amount	\$5 Violation Final Pena	
			This vio	lation Final Assessed Penalty (adjusted f	or limits) \$3,838

	E	conomic	Benefit	Wo	rksheet		
Pesnondent		TERPRISES INC.					
		TERFRISES INC.	(FCW N0. 2)				
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S	Supply				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		Bute Requireu	That Bute		Interest Savea		LD / line une
Item Description							
Delayed Costs				1			
Equipment	\$400	1-Jun-2020	12-Aug-2020		\$0	\$5	\$5
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	<u>\$0</u> \$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	<u>\$0</u> \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	pressure gau	ge (\$200 per tank	x two pressure dat	e tanks) te of coi	, calculated from t mpliance.	sure tank with an ea he date of the inves	tigation to the
Avoided Costs	ANNU	ALIZE avoided co	osts before er			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 Financial Assurance				0.00	<u>\$0</u> \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
				0.00	\$0	\$0	\$0 \$0
					30		
ONE-TIME avoided costs							
				0.00	\$0	\$0	\$0
ONE-TIME avoided costs							

		ening Date		Docket No. 2020-2	L183-PWS-E	PCW
		lespondent Case ID No.	VADHWANI ENTERPRISES IN	NC. (PCW No. 2)		Revision 4 (April 2014)
Reg.			RN106241375		PCW Revi	sion September 1, 2019
	F (-)		Public Water Supply			
		ation Number	Epifanio Villarreal			
		Rule Cite(s)		Гех. Admin. Code §290.46(s)(1)		
	Violatio	n Description	Failed to calibrate the F	acility's well meter at least once	every three years.	
					Base Penalty	\$5,000
>> Env	vironme	ntal, Proper	rty and Human Health	Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual				
		Potential		× Perce	nt <u>3.0%</u>	
>>Pro	gramma	tic Matrix				
		Falsification	Major Moderate	Minor Perce	nt 0.0%	
			ИИ			1
		Failure to c	alibrate the well meter could	result in inaccurate water usage	or unavailable water	
	Matrix Notes			xpose persons served by the Fac Ild not exceed levels protective o		
		anour			i numan nearri.	
				Adjustme	nt \$4,850	
					+ .,	¢150
						\$150
Violati	on Event	ts				
		Number of \	/iolation Events 1	55 Numbe	er of violation days	
			daily	7		
			weekly			
			monthly quarterly		iolation Base Penalty	\$150
			semiannual		folution base renarcy	\$150
			annual			
				4		
			Ono single	event is recommended.		
			One single	event is recommended.		
Good F	aith Fff	orts to Com	ply 25.0%	1	Reduction	\$37
			Before NOE/NOV		Reduction	+
			Extraordinary Ordinary x			
			Ordinary x N/A			
			Notes The Respond	dent achieved compliance on Aug	ust 6, 2020.	
			<u></u>			
					Violation Subtotal	\$113
Econor	mic Bene	efit (EB) for	this violation	Statu	itory Limit Test	
		Estimate	ed EB Amount	\$0 Violatio	on Final Penalty Total	\$128
			This vis	lation Final Assessed Penalty	(adjusted for limits)	\$128
Econor	mic Bene					¢170
			This vis	lation Final Accord Donalt	(adjusted for limits)	\$128
				nation Final Assessed Fenalty	(aujusteu for mints)	φ120

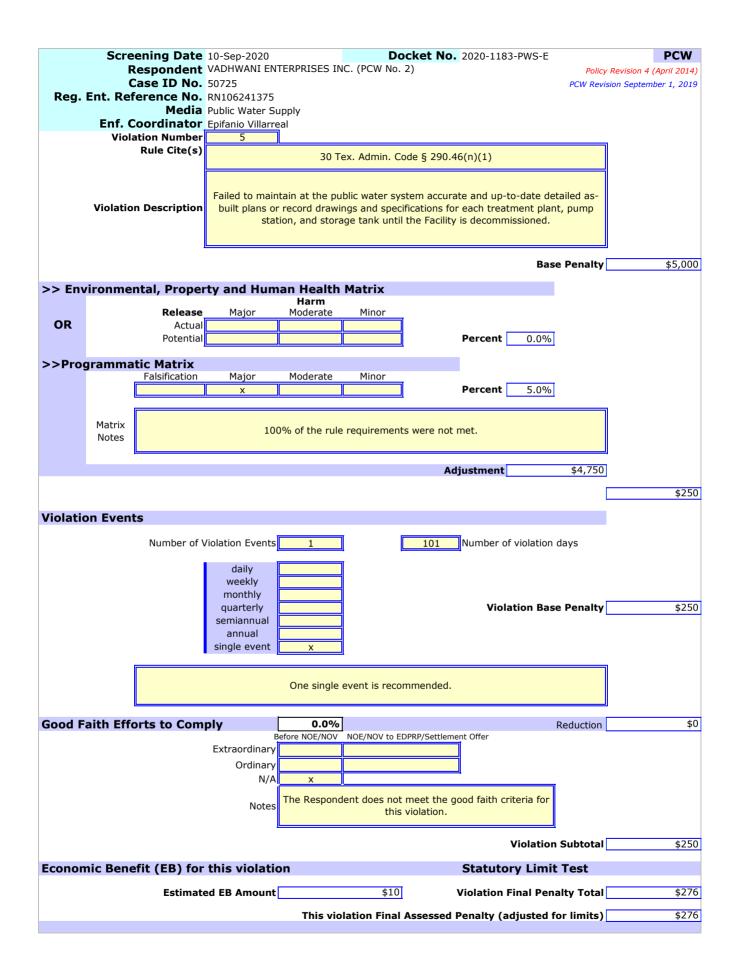
	E	conomic	Benefit	Wo	rksheet		
Respondent		NTERPRISES INC.	(PCW No. 2)				
Case ID No.		TER RISES INC.	(100 100.2)				
Reg. Ent. Reference No.							
	Public Water S	Supply				Percent Interest	Years of
Violation No.	. 2						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description	1						
Delayed Costs	;						
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)		<u> </u>		0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	+24	4 1 2020	6.4. 2020	0.00	\$0	n/a	\$0
Training/Sampling	\$31	1-Jun-2020	6-Aug-2020	0.18	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	<u>\$0</u> \$0
Notes for DELAYED costs					librate the Facility date to the date of	's well meter (\$31 p of compliance.	er well meter),
Avoided Costs							
		ALIZE avoided c	osts before er		<u> </u>	r one-time avoide	
Disposal		ALIZE avoided c	osts before er	0.00	\$0	\$0	\$0
		ALIZE avoided c	osts before er	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Disposal Personnel Inspection/Reporting/Sampling		ALIZE avoided c	osts before er	0.00 0.00 0.00	\$0 \$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment		ALIZE avoided c	osts before er	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		ALIZE avoided c	osts before er	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		ALIZE avoided c	osts before er	0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		ALIZE avoided c	osts before er	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		ALIZE avoided c	osts before er	0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date Respondent	10-Sep-2020 VADHWANI ENTERPRISES IN	Docket No. 2020-1183-PWS-E NC. (PCW No. 2)	PCW Policy Revision 4 (April 2014)
	C	ase ID No.	50725		PCW Revision September 1, 2019
Reg.	Ent. Ref	erence No.			
	Enf (Public Water Supply Epifanio Villarreal		
		ation Number			
		Rule Cite(s)		ex. Admin. Code § 290.44(h)(4)	
	Violatio	n Description	annual basis by a recognize they are operating within	prevention assemblies tested upon installation ed backflow prevention assembly tester and c n specifications. Specifically, the backflow pre- at the carbonated soda dispenser had not bee annually.	ertify that vention
				Bas	se Penalty \$5,000
>> En	vironme	ntal, Proper	ty and Human Health	Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual			
		Potential	X	Percent 15.0%	I
>>Pro	gramma	tic Matrix			
	granna	Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix Notes		roperly which could result in a	blies on an annual basis would not ensure the a reverse flow of contaminants entering into t ed levels protective of human health.	
				Adjustment	\$4,250
					\$750
Violati	ion Event	łe			
VIUIALI					
		Number of \	/iolation Events 4	101 Number of violation	days
			daily	1	
			weekly	j	
			monthly <u>x</u>		- - - - - - - - - -
			quarterly semiannual	Violation Bas	se Penalty \$3,000
			annual		
			single event	<u>]</u>	
		Four month		calculated from the date of the investigation,	June 1,
			2020, to the date of	screening, September 10, 2020.	
Good F	Faith Effo	orts to Com	olv 0.0%	1	Reduction \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary		
			N/A <mark>x</mark>		1
			Notes The Respond	dent does not meet the good faith criteria for this violation.	
				Violatio	n Subtotal \$3,000
Econor	mic Bene	efit (EB) for	this violation	Statutory Limi	t Test
		Estimate	ed EB Amount	\$37 Violation Final Per	alty Total \$3,311
			This vic	blation Final Assessed Penalty (adjusted	
				augusted i charty (augusted	φ3,511

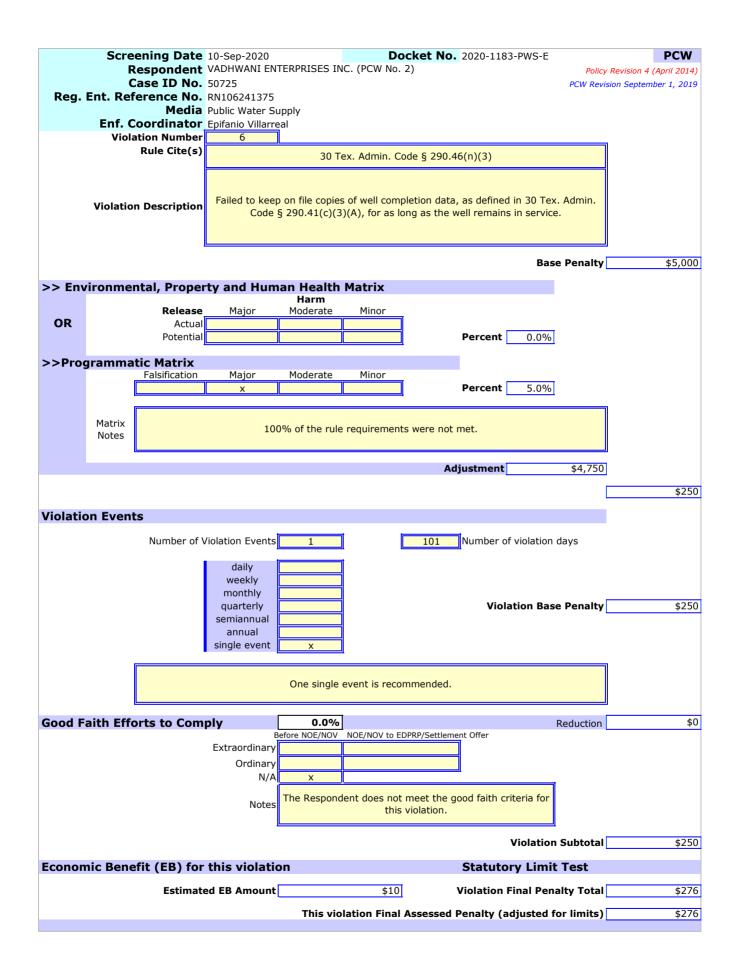
Respondent							
Case ID No.	50725						
leg. Ent. Reference No.	RN106241375						
	Public Water S						Years of
Violation No.		· F F 7				Percent Interest	Depreciation
	-					5.0	. 1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		Date Required	That Butte		1110100000000000		22741104110
Delayed Costs							
Equipment	1			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$100	1-Jun-2020	1-May-2021	0.92	\$5	n/a	\$5
Training/Sampling	\$31	1-Jun-2020	1-May-2021	0.92	\$1	n/a	\$1
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)							
	guidance and installation a	conduct employed	e training to ens basis by a recog	sure tha gnized b	at all backflow prev backflow assembly	n/a to update the Facilit vention assemblies a tester and certified	are tested upor that they are
Notes for DELAYED costs	guidance and installation a operating The traini	conduct employe and on an annual within specificatio ng/sampling dela	e training to end basis by a recogns, calculated fr yed cost include	es the e sure that gnized the com the compliants s the estimation	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount t	to update the Facilit ention assemblies a	ty's operationa are tested upor that they are ated date of prevention
	guidance and installation a operating The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location),	e training to ens basis by a recog ns, calculated fr yed cost include calculated from	es the esure that gnized b rom the compli- es the esure the inv	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount t vestigation date to	to update the Facili vention assemblies a tester and certified igation to the estima to test the backflow the estimated date	ty's operationa are tested upor that they are ated date of prevention of compliance.
Avoided Costs	guidance and installation a operating The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location),	e training to ens basis by a recog ns, calculated fr yed cost include calculated from	es the esure that gnized b rom the compli- es the esure the inv	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount t vestigation date to item (except for	to update the Facili vention assemblies a tester and certified igation to the estim- to test the backflow the estimated date	ty's operationa are tested upor that they are ated date of prevention of compliance d costs)
	guidance and installation a operating The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location),	e training to ens basis by a recog ns, calculated fr yed cost include calculated from	es the estimation of the source that a prized by a prized by a prized by a prize of the source of th	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount t vestigation date to	to update the Facili vention assemblies a tester and certified igation to the estima to test the backflow the estimated date	ty's operationa are tested upor that they are ated date of prevention of compliance
Avoided Costs Disposal Personnel	guidance and installation a operating The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location),	e training to ens basis by a recog ns, calculated fr yed cost include calculated from	es the es gnized b com the compli- s the es the inv tering 0.00	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount t vestigation date to item (except for \$0	to update the Facilit vention assemblies a tester and certified igation to the estima to test the backflow the estimated date r one-time avoide \$0	ty's operationa are tested upor that they are ated date of prevention of compliance d costs) \$0
Avoided Costs Disposal Personnel	guidance and installation a operating The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location),	e training to ens basis by a recog ns, calculated fr yed cost include calculated from	es the esure that gnized b com the compli tes the esure the inv tering 0.00 0.00	estimated amount at all backflow prev packflow assembly date of the invest ance. stimated amount t vestigation date to item (except for \$0 \$0	to update the Facilia vention assemblies a tester and certified igation to the estima- to test the backflow the estimated date r one-time avoider \$0 \$0	ty's operationa are tested upor that they are ated date of prevention of compliance d costs) \$0 \$0
Avoided Costs Disposal Personnel Ispection/Reporting/Sampling	guidance and installation a operating The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location),	e training to ens basis by a recog ns, calculated fr yed cost include calculated from	es the esure that gnized b com the compli- s the esure the inv tering 0.00 0.00 0.00	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount t vestigation date to item (except for \$0 \$0 \$0	to update the Facilit vention assemblies a tester and certified igation to the estima- to test the backflow the estimated date one-time avoide \$0 \$0 \$0	ty's operationa are tested upor that they are ated date of prevention of compliance d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	guidance and installation a operating The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location),	e training to ens basis by a recog ns, calculated fr yed cost include calculated from	es the esure that an arrest the esure that a prized by the compliant of the esure the investment of the esure the investment of the esure the esur	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount t vestigation date to item (except for \$0 \$0 \$0 \$0	to update the Facilia vention assemblies a tester and certified igation to the estima- to test the backflow the estimated date r one-time avoide \$0 \$0 \$0 \$0	ty's operationa are tested upor that they are ated date of prevention of compliance \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Ispection/Reporting/Sampling Supplies/Equipment Financial Assurance	guidance and installation a operating v The traini assembly (\$3	conduct employe and on an annual within specificatio ng/sampling dela 1 x one location), ALIZE avoided c	e training to ens basis by a recogns, calculated fr yed cost include calculated from	es the estimation of the sure that an arrival the sure that are the sure the sure the investment of the investment of the investment of the sure the investment of the sure th	estimated amount at all backflow prev backflow assembly date of the invest ance. stimated amount to vestigation date to item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to update the Facilit vention assemblies a tester and certified igation to the estim- to test the backflow the estimated date r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	ty's operationa are tested upor that they are ated date of prevention of compliance \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	guidance and installation a operating v The traini assembly (\$3 ANNU/ Santa Sa	conduct employee and on an annual within specificatio ing/sampling dela 1 x one location), ALIZE avoided c 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	e training to ens basis by a recogns, calculated fr yed cost include calculated from osts before en 10-Sep-2020 e estimated am	es the esure that an ized be compliant to the esure that an investment of the esure the esure the investment of the esure the investment of the esure the esure the investment of the esure the esur	estimated amount at all backflow prev packflow assembly date of the invest ance. stimated amount t vestigation date to item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to update the Facilia vention assemblies a tester and certified igation to the estima- to test the backflow the estimated date r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ty's operationa are tested upor that they are ated date of prevention of compliance d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2020-1183-PW	
		cespondent Case ID No.	VADHWANI ENTERPRISES II	NC. (PCW NO. 2)	Policy Revision 4 (April 2014) PCW Revision September 1, 2019
Reg.			RN106241375		rew Revision September 1, 2019
		Media	Public Water Supply		
			Epifanio Villarreal		
	Viola	ation Number Rule Cite(s)			
		Rule elle(3)	30 Tex	x. Admin. Code § 290.110(c)(4)(A)	
	Violatio	n Description	distribution system at least	ectant residual at representative locations once every seven days. Specifically, the R rine residual at three out of the five sites system's monitoring plan.	Respondent was
					Base Penalty \$5,000
>> En	vironme	ntal. Prope	ty and Human Health	Matrix	
,, <u> </u>			Harm		_
OR		Release Actual	Major Moderate	Minor	
UK		Potential		X Percent 3	3.0%
			<u> </u>		
>>Pro	gramma	tic Matrix	Madau Madauata	Maran	
		Falsification	Major Moderate	Minor Percent 0	0.0%
					.070
	Matrix Notes		d expose persons served by	I at representative locations throughout t the Facility to an insignificant amount of o d levels protective of human health.	
				Adjustment	\$4,850
					\$150
Violati	ion Event	ts			
		Number of \	/iolation Events 1	101 Number of viola	ation days
			daily weekly monthly quarterly semiannual annual single event <u>x</u>	Violation	n Base Penalty \$150
			One single	event is recommended.	
Good F	Faith Fff	orts to Com	0.0%		Reduction \$0
20041			Before NOE/NOV		φυ
			Extraordinary		
			Ordinary		
			N/Al <u>x</u> Notes	dent does not meet the good faith criteria this violation.	a for
				Viola	ation Subtotal \$150
Fconor	mic Rong	fit (FR) for	this violation	Statutory L	
Leonor					
		Estimate	ed EB Amount	\$10 Violation Final	Penalty Total \$166
			This vie	olation Final Assessed Penalty (adjus	ted for limits) \$166

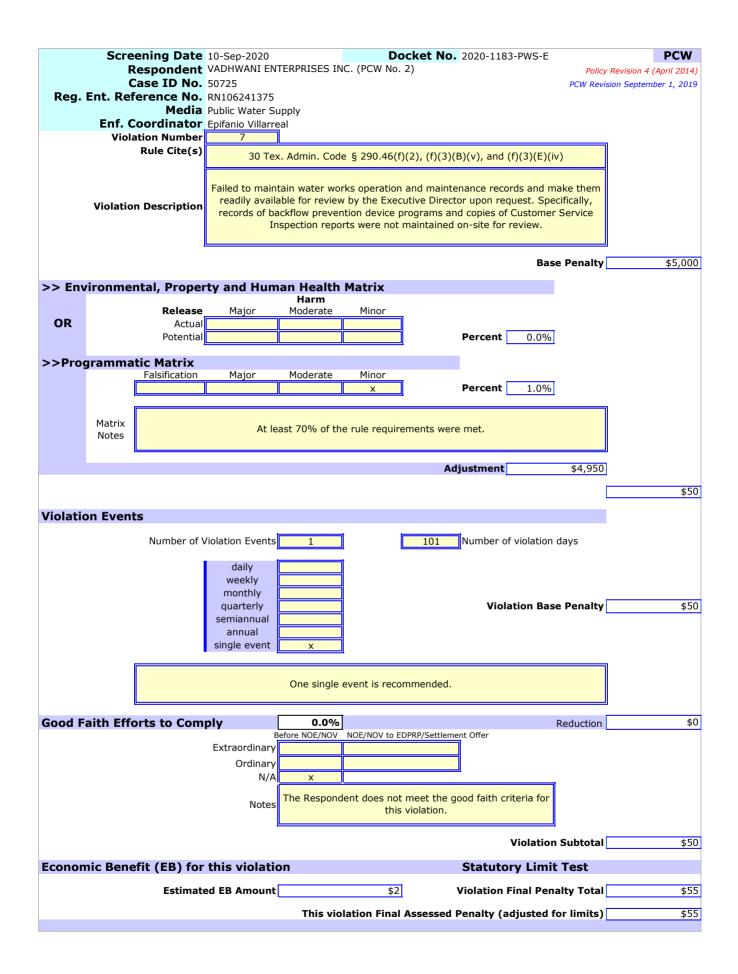
	E	conomic	Benefit	Wo	rksheet		
Respondent	VADHWANI EN	TERPRISES INC.	(PCW No. 2)				
Case ID No.							
leg. Ent. Reference No.							
	Public Water S						Years of
		ырру				Percent Interest	
Violation No.	4						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Casta							
Delayed Costs	r	1		0.00	¢0	¢0	¢0
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Lingingering/construction				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$10	1-Jun-2020	1-Mav-2021	0.92	\$0	n/a	\$0
Remediation/Disposal	<u> </u>		1 1147 2021	0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)							
	The delayed	cost includes the	ostimated amo	0.00	\$0	ctant residual at loa	\$0
Notes for DELAYED costs	seven days	(\$10 per week), c	alculated from t	unt to r he inve	nonitor the disinfe estigation date to t	ctant residual at lea he estimated date c	st once every f compliance.
Avoided Costs	seven days	(\$10 per week), c	alculated from t	unt to r he inve	nonitor the disinfe estigation date to t item (except for	ctant residual at lea he estimated date o r one-time avoide	st once every f compliance.
Avoided Costs Disposal	seven days	(\$10 per week), c	alculated from t	unt to r the inve	nonitor the disinfe estigation date to t item (except for \$0	ctant residual at lea he estimated date o r one-time avoide \$0	st once every f compliance. d costs) \$0
Avoided Costs Disposal Personnel	seven days	(\$10 per week), c	alculated from t	unt to r the inve tering 0.00 0.00	nonitor the disinfe estigation date to t item (except for \$0 \$0	ctant residual at lea he estimated date c r one-time avoide \$0 \$0	st once every f compliance. d costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	seven days	(\$10 per week), c	alculated from t	unt to r the inve tering 0.00 0.00 0.00	nonitor the disinfe stigation date to t item (except for \$0 \$0 \$0	ctant residual at lea he estimated date o r one-time avoider \$0 \$0 \$0	st once every f compliance. d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	seven days	(\$10 per week), c	alculated from t	unt to r the inve 0.00 0.00 0.00 0.00	nonitor the disinfe estigation date to t item (except for \$0 \$0 \$0 \$0 \$0	ctant residual at lea he estimated date o r one-time avoider \$0 \$0 \$0 \$0	st once every f compliance. f costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	seven days ANNU/	(\$10 per week), c	calculated from 1	unt to r tering 0.00 0.00 0.00 0.00 0.00	nonitor the disinfe estigation date to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ctant residual at lea he estimated date c r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	st once every f compliance. f oosts) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	seven days	(\$10 per week), c	alculated from t	unt to r the investigation tering 0.00 0.00 0.00 0.00 0.28	nonitor the disinfe estigation date to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ctant residual at lea the estimated date of r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	st once every f compliance. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$10
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	seven days ANNU/	(\$10 per week), c	calculated from 1	unt to r tering 0.00 0.00 0.00 0.00 0.00	nonitor the disinfe estigation date to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ctant residual at lea he estimated date c r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	st once every f compliance. f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	seven days ANNU/ \$10 The avoided	(\$10 per week), c	estimated amo	unt to r tering 0.00 0.00 0.00 0.00 0.00 0.28 0.00 unt to r	nonitor the disinfe estigation date to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ctant residual at lea the estimated date of r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	st once every f compliance. (f costs) (f costs
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	seven days ANNU/ \$10 The avoided	(\$10 per week), c	estimated amo	unt to r tering 0.00 0.00 0.00 0.00 0.00 0.28 0.00 unt to r	nonitor the disinfe estigation date to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ctant residual at lea he estimated date o r one-time avoider \$0 \$0 \$0 \$0 \$10 \$0 \$10 \$0 ctant residual at lea	st once every f compliance. f costs) \$0 \$0 \$0 \$0 \$10 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Respondent	VADHWANI EN	TERPRISES INC.	(PCW No. 2)				
Case ID No.			. ,				
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		appiy				Percent Interest	Depreciation
	0					5.0	
	Item Cost	Date Required	Final Date	Vrs	Interest Saved	Costs Saved	EB Amount
Item Description		Bute Required	That Duce		Interest Suveu		ED Amount
Item Description							
Delayed Costs							
Delayed Costs					¢0	±0	±0
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	-			0.00	\$0	n/a	\$0
Record Keeping System	\$180	1-Jun-2020	1-Jul-2021	1.08	\$10	n/a	\$10
Training/Sampling	<u> </u>	1 5011 2020	1 901 2021	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 \$0	n/a n/a	\$0 \$0
	The delaye	ed cost includes th	e estimated an	0.00	\$0		\$0
Other (as needed)				0.00	\$0 compile and mair	n/a	\$0 ater system
	accurate and	d up-to-date detai	led as-built plai	0.00 nount to ns or re	\$0 compile and mair cord drawings and	n/a ntain at the public w	\$0 ater system ach treatment
Other (as needed)	accurate and	d up-to-date detai	led as-built plai ge tank, calcula	0.00 nount to ns or re	\$0 compile and mair cord drawings and n the date of the i	n/a ntain at the public w specifications for ea	\$0 ater system ach treatment
Other (as needed)	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 nount to ns or re- ted fror of comp	\$0 compile and mair cord drawings and n the date of the i liance.	n/a ntain at the public w specifications for ea	\$0 ater system ach treatment estimated date
Other (as needed) Notes for DELAYED costs	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 nount to ns or re- ted fror of comp	\$0 compile and mair cord drawings and n the date of the i liance.	n/a ntain at the public w specifications for ea nvestigation to the o	\$0 ater system ach treatment estimated date
Other (as needed) Notes for DELAYED costs Avoided Costs	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 nount to ns or re- ted fror of comp	\$0 compile and main cord drawings and n the date of the i liance. item (except for \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the ea r one-time avoider \$0 \$0	\$0 ater system ach treatment estimated date d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 nount to ted fror of comp tering 0.00 0.00 0.00	\$0 compile and main cord drawings and n the date of the i liance. item (except fo \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the r one-time avoide \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date d costs) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 nount to ted fror of comp tering 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the o r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 nount to ns or re- ted fror of comp tering 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the o r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 10 ount to 15 or re- ted fror of comp 1 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 nount to ns or re- ted fror of comp tering 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the o r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 10 ount to 15 or re- ted fror of comp 1 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 10 ount to 15 or re- ted fror of comp 1 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 10 ount to 15 or re- ted fror of comp 1 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 10 ount to 15 or re- ted fror of comp 1 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	accurate and plant, pump s	d up-to-date detai station, and storag	led as-built plan ge tank, calcula	0.00 10 ount to 15 or re- ted fror of comp 1 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 compile and mair cord drawings and n the date of the i liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ntain at the public w specifications for ea nvestigation to the r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ater system ach treatment estimated date \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Item Cost	Date Required	Final Date	Yrs	Interest Saved	5.0 Costs Saved	Depreciation 15
Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	
						EB Amount
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
						\$0
					1 -	\$0
\$180	1-Jun-2020	1-Jul-2021				\$10
						\$0
						\$0
						\$0
			0.00	\$0	ll/d	\$0
in 30 Tex. Ad	Imin. Code § 290.		the Fac	whith calculated tre		
	NITZE avoided o			e of compliance.		-
ANNU	ALIZE avoided co		ntering	e of compliance. item (except for	one-time avoided	l costs)
ANNU	ALIZE avoided co		tering	e of compliance. item (except for \$0	r one-time avoide \$0	1 costs) \$0
ANNU	ALIZE avoided co		tering 0.00 0.00	e of compliance. item (except for \$0 \$0	r one-time avoided \$0 \$0	I costs) \$0 \$0
ANNU/	ALIZE avoided co		tering 0.00 0.00 0.00	e of compliance. item (except for \$0 \$0 \$0 \$0	r one-time avoided \$0 \$0 \$0	i costs) \$0 \$0 \$0
	ALIZE avoided co		0.00 0.00 0.00 0.00 0.00	e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoided \$0 \$0 \$0 \$0 \$0	1 costs) \$0 \$0 \$0 \$0 \$0
ANNU,	ALIZE avoided co		tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
ANNU,	ALIZE avoided co		0.00 0.00 0.00 0.00 0.00	e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoided \$0 \$0 \$0 \$0 \$0	1 costs) \$0 \$0 \$0 \$0 \$0
		The delayed cost includes the elements of the second secon		0.00 \$180 1-Jun-2020 1-Jul-2021 1.08 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 \$0 1-Jun-2020 1-Jul-2021 1.08 \$10 0.00 \$0 \$0 \$0 0.00 \$0 \$0 \$0 0.00 \$0 \$0 \$0 0.00 \$0 \$0 \$0 0.00 \$0 \$0 \$0 0.00 \$0 \$0 \$0 1 0.00 \$0 \$0 1 0.00 \$0 \$0	0.00 \$0 \$0 0.00 \$0 \$0 \$0 \$180 1-Jun-2020 1-Jul-2021 1.08 \$10 n/a 0.00 \$0 \$0 \$0 \$0 \$0 0.00 \$0 \$0 \$0 \$0 \$0 0.00 \$0 \$0 \$0 \$0 \$0 0.00 \$0 \$0 \$0 \$0 \$0 0.00 \$0 \$0 \$0 \$0 \$0 0.00 \$0 \$0 \$0 \$0 \$0 0.00 \$0 \$0 \$0 \$0 \$0 1 0.00 \$0 \$0 \$0 \$0



eg. Ent. Reference No. Media Violation No.	Public Water S					Percent Interest	Years of Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Delayed Costs Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$45	1-Jun-2020	1-May-2021	0.92	\$2	n/a	\$2
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 ount to	\$0 compile and maint	n/a n/a ain water system of on upon request by	\$0 peration and
Other (as needed) Notes for DELAYED costs	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av ie inves	\$0 compile and main ailable for inspecti tigation to the esti	n/a cain water system og on upon request by mated date of comp	\$0 peration and the Executive pliance.
Other (as needed) Notes for DELAYED costs Avoided Costs	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av ie inves	\$0 compile and main ailable for inspecti tigation to the esti item (except for	n/a rain water system of on upon request by mated date of comp one-time avoided	\$0 peration and the Executive pliance. d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av ie inves	\$0 compile and main ailable for inspecti tigation to the esti item (except for \$0	n/a main water system of on upon request by mated date of comp one-time avoided \$0	\$0 peration and the Executive pliance. d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av ie inves tering 0.00 0.00	\$0 compile and main ailable for inspecti tigation to the esti item (except for \$0 \$0	n/a ain water system of on upon request by mated date of comp one-time avoided \$0 \$0	\$0 peration and the Executive pliance. d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av ie inves	\$0 compile and main ailable for inspecti tigation to the esti item (except for \$0	n/a ain water system of on upon request by mated date of comp one-time avoided \$0 \$0 \$0	\$0 peration and the Executive pliance. d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av ie inves tering 0.00 0.00	\$0 compile and maint ailable for inspecti tigation to the esti item (except for \$0 \$0 \$0 \$0	n/a ain water system of on upon request by mated date of comp one-time avoided \$0 \$0	\$0 peration and the Executive pliance. d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av tering 0.00 0.00 0.00 0.00	\$0 compile and maint ailable for inspecti tigation to the esti item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a rain water system of on upon request by mated date of comp rone-time avoider \$0 \$0 \$0 \$0 \$0 \$0	\$0 peration and the Executive Jliance. d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	maintenance Direct	records and mak or, calculated from	e them immedia m the date of th	0.00 ount to ately av tering 0.00 0.00 0.00 0.00 0.00	\$0 compile and maint ailable for inspecti tigation to the esti item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a rain water system of on upon request by mated date of comp one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 peration and the Executive pliance. (d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	R	ening Date lespondent Case ID No.	VADHWANI ENTERPRISES		ket No. 2020-1183-PWS-E)		PCW Revision 4 (April 2014) sion September 1, 2019
Reg.	Ent. Ref	erence No. Media	RN106241375 Public Water Supply				
		ation Number	Epifanio Villarreal				
	VIOI	Rule Cite(s)		0.41(-)(2)(0)	d TCFO Assessed Outlow Desilvet	10 201E	
		Rule elle(3)			nd TCEQ Agreed Order Docket N Provision No. 2.e.iv	10. 2015-	
	Violatio	n Description	enclose the well in a locke or damage to the facilities	d, ventilated well by trespassers. S	ler-resistant fence with a lockal house to exclude possible cont Specifically, the well was not pro or an intruder-resistant fence.	amination	
					Bas	e Penalty	\$5,000
>> Env	vironme	ntal, Prope	rty and Human Healt	h Matrix			
		Release	Harm Major Moderate	Minor			
OR		Actual					
		Potential	X		Percent 15.0%		
_							
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor			
					Percent 0.0%		
	Matrix Notes	Failure to pro		perons served by s protective of hu	the Facility to contaminants wh man health.	ich would	
					Adjustment	\$4,250	
							\$750
						L	φ 7 50
Violati	on Event	ts					
		Number of V	/iolation Events 5		375 Number of violation	days	
			daily veekly monthly quarterly x semiannual annual single event compared to the semiannual single event single		Violation Bas	e Penalty	\$3,750
		Five quart		led, calculated fro ng, September 10	om September 1, 2019 to the d 0, 2020.	ate of	
Good F	aith Effe	orts to Com	ply 10.04	%		Reduction	\$375
			Before NOE/NC		RP/Settlement Offer		
			Extraordinary				
			Ordinary	x			
			N/A		compliance on September 23, 020.		
			<u> </u>		Violation	Subtotal	\$3,375
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	Test	
			ed EB Amount	\$0	Violation Final Pen	_	\$3,763
			<u> </u>				
			i nis v		ssessed Penalty (adjusted f	or limits)	\$3,763

	E	conomic	Benefit	Wo	rksheet		
Respondent		ITERPRISES INC.	(PCW No. 2)				
Case ID No.			(101110.2)				
Reg. Ent. Reference No.							
	Public Water S	upply				Percent Interest	Years of
Violation No.	8						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs	Ir				+ 2	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed) Engineering/Construction				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Land				0.00	\$0		\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	-			0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)							
	The delayed		intrudor-rocici	0.00	\$0	ding for the well is c	\$0
Notes for DELAYED costs		Economi	c Benefit Work	ant fen sheet fo	ce or lockable build r Violation No.1 of	ding for the well is c PCW No. 1.	aptured in the
Avoided Costs		Economi	c Benefit Work	ant fen sheet fo	ce or lockable build r Violation No.1 of item (except for	ding for the well is c PCW No. 1. r one-time avoide	aptured in the
Avoided Costs Disposal		Economi	c Benefit Work	ant fen sheet fo ntering	ce or lockable buik r Violation No.1 of item (except for \$0	ding for the well is c PCW No. 1. r one-time avoide \$0	aptured in the d costs) \$0
Avoided Costs Disposal Personnel		Economi	c Benefit Work	tering	ce or lockable built r Violation No.1 of item (except fo r \$0 \$0	ding for the well is c PCW No. 1. r one-time avoide \$0 \$0	aptured in the d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		Economi	c Benefit Work	ant fen sheet fo tering 0.00 0.00	ce or lockable buik r Violation No.1 of item (except for \$0 \$0 \$0	ding for the well is c PCW No. 1. r one-time avoide \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment		Economi	c Benefit Work	ant fen sheet fo 0.00 0.00 0.00 0.00	ce or lockable built r Violation No.1 of item (except for \$0 \$0 \$0 \$0	ding for the well is c PCW No. 1. r one-time avoide \$0 \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		Economi	c Benefit Work	ant fen sheet fo 0.00 0.00 0.00 0.00 0.00 0.00	ce or lockable buik r Violation No.1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0	ding for the well is c PCW No. 1. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		Economi	c Benefit Work	ant feng sheet fo 0.00 0.00 0.00 0.00 0.00 0.00	ce or lockable buik r Violation No.1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ding for the well is c PCW No. 1. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	aptured in the (a costs) (b) (c) (c) (c) (c) (c) (c) (c) (c
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		Economi	c Benefit Work	ant fen sheet fo 0.00 0.00 0.00 0.00 0.00 0.00	ce or lockable buik r Violation No.1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0	ding for the well is c PCW No. 1. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	aptured in the (a costs) (b) (c) (c) (c) (c) (c) (c) (c) (c
Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		Economi	c Benefit Work	ant feng sheet fo 0.00 0.00 0.00 0.00 0.00 0.00	ce or lockable buik r Violation No.1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ding for the well is c PCW No. 1. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	aptured in the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Compliance History Report

Compliance History Report for CN603641176, RN106241375, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respo Owner/Operato		1603641176, Vadhwan	i Enterprises Inc.	Classification: H	IGH	Rating	; 0.00
Regulated Entity	/: RM	106241375, HANCOC	K PLAZA I & II	Classification: N	OT APPLICABLE	Rating	J: N/A
Complexity Poin	ts: N/	A		Repeat Violator:	N/A		
CH Group:	14	- Other					
Location:	18	200 FM 306 CANYON	I LAKE, TX 78133-4	4379, COMAL COUNTY			
TCEQ Region:	RE	GION 13 - SAN ANTO	NIO				
ID Number(s): PUBLIC WATER SY		Y REGISTRATION 046	0271				
Compliance Hist	ory Period:	September 01, 201	5 to August 31, 202	0 Rating Year:	2020 R	ating Date:	09/01/2020
Date Compliance	e History Re	port Prepared:	December 15, 202	20			
Agency Decision	Requiring C	Compliance Histor	y: Enforceme	nt			
Component Peri	od Selected:	December 15, 20	015 to December 15	5, 2020			
TCEQ Staff Mem	ber to Conta	ct for Additional 1	Information Reg	arding This Compli	ance History.		
Name: EPI			-		361) 825-3421		
A. Final Orders			nt decrees:	5-0950-PWS-E (1660	Order-Agreed Or	der With Denia	al)
Citati		Chapter 290, SubChap	ter D 290.39(e)(1)				
		Chapter 290, SubChap					
	5A THSC	Chapter 341, SubCha	pter A 341.035(a)				
	iption: Failure	-	e plan approval prior	to operating a public w	ater supply.		
Citati		Chapter 290, SubChap	ter D 290.46(d)(2)(A)			
		Chapter 290, SubChap		,			
	5A THSC	Chapter 341, SubCha	pter A 341.0315(c)				
Speci	•	chlorine residual at th		east 0.2 mg/L at the pres in distribution was 0.02		n the distributic	on system.
Citati	on: 30 TAC C	Chapter 290, SubChap	ter D 290.46(v)				
press comp		and at the well was no		vith requirements. Species of the second secon			
Citati	on: 30 TAC C	Chapter 290, SubChap	ter D 290.41(c)(3)(ł	K)			
	•	to provide a casing ve	ent for the well.				
Classi Citati	ification: Mino		tor D 200 41(c)(2)(3)	1)			
		Chapter 290, SubChap		ordance with requireme	nts Specifically	the concrete	slab
	.poon runule			je 1	opeenearly		

did not have a slope of no less than 0.25 inches around the well casing and the slab was not three feet in all directions. Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(M) Description: Failure to provide a raw water sampling tap for the well. Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(N) Description: Failure to provide a flow meter for the well. Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(P) Description: Failure to provide an all-weather access road to the well site. Specifically, the access to the well had decomposing lumber steps on a very steep gradient. Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(4) Description: Failure to maintain watertight conditions. Specifically, the chlorine injection line was leaking. Classification: Moderate 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(O) Citation: Description: Failure to provide an intruder-resistant fence or locked ventilated well house for the well. Specifically, the well was not protected by a locked ventilated well house or an intruder-resistant fence. Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.42(I) Description: Failure to provide a plant operations manual. Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(ii)(III) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(B)(iii) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(D)(i) 30 TAC Chapter 290, SubChapter F 290.110(e)(4)(B) Description: Failure to make adequate records available for review. Specifically, the records for the amount of water treated (well meter reading) and chemicals used each week, weekly chlorine residual logs and bacteriological sample results were not provided.

Classification: Moderate

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

Description: Failure to provide a distribution map.

Classification: Moderate

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

Description: Failure verify the accuracy of manual disinfectant residual analyzers at least once every 90 days using chlorine solutions of known concentrations. Specifically, no documentation to indicate that the manual disinfectant residual analyzer was being verified for accuracy at least once every 90 days was provided.

Criminal convictions: B.

N/A

C. Chronic excessive emissions events:

N/A

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

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

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

N/A

F. **Environmental audits:**

N/A

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

H. Voluntary on-site compliance assessment dates:

Compliance History Report for CN603641176, RN106241375, Rating Year 2020 which includes Compliance History (CH) components from December 15, 2015, through December 15, 2020.

N/A

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

J. Early compliance: N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A All NOVs Issued During Component Period 12/15/2015 and 12/15/2020

N/A For Informational Purposes Only

Appendix B All Investigations Conducted During Component Period December 15, 2015 and December 15, 2020

Item 1 August 30, 2020** For⁽¹⁶⁵²³⁵⁸⁾mational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2015 and 08/31/2020.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING VADHWANI ENTERPRISES INC. RN106241375

BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2020-1183-PWS-E

On ______, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding VADHWANI ENTERPRISES INC. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

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

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

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

I. FINDINGS OF FACT

- 1. The Respondent owns and operates a public water supply located at 18200 Farm-to-Market Road 306 in Canyon Lake, Comal County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 15 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(71).
- 2. During an investigation conducted on June 1, 2020 through July 7, 2020, an investigator documented that:
 - a. Only one of the three pressure tanks was equipped with a pressure gauge.
 - b. The Facility's well meter was not calibrated at least once every three years.
 - c. The backflow prevention assembly device installed at the carbonated soda dispenser had not been tested annually.

- d. The free chlorine residual was being monitored at three out of the five sites listed in the system's monitoring plan.
- e. The Respondent did not maintain at the public water system accurate and up-todate detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank until the Facility is decommissioned.
- f. The Respondent did not keep on file copies of well completion data, as defined in 30 TEX. ADMIN. CODE § 290.41(c)(3)(A), for as long as the well remains in service.
- g. Records of backflow prevention device programs and copies of Customer Service Inspection reports were not maintained on-site for review.
- h. The well was not protected by a locked, ventilated well house or an intruderresistant fence.
- 3. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Facility:
 - a. On August 6, 2020, a photograph and invoice were submitted indicating that the well meter has been replaced.
 - b. On August 12, 2020, a photograph and invoice were submitted indicating that all pressure tanks have been equipped with a pressure gauge.
 - c. On September 23, 2020:
 - i. Provided a locked, ventilated well house to protect the Facility's well.
 - ii. Provided copies of Customer Service Inspection reports.

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 the Facility's three pressure tanks with an easily readable pressure gauge, in violation of 30 TEX. ADMIN. CODE § 290.43(d)(2).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to calibrate the Facility's well meter at least once every three years, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(1).
- 4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to have all backflow prevention assemblies tested upon installation and on an annual basis by a recognized

backflow prevention assembly tester and certify that they are operating within specifications, in violation of 30 TEX. ADMIN. CODE § 290.44(h)(4).

- 5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to monitor the disinfectant residual at representative locations throughout the distribution system at least once every seven days, in violation of 30 TEX. ADMIN. CODE § 290.110(c)(4)(A).
- 6. As evidenced by Finding of Fact No. 2.e, the Respondent failed to maintain at the public water system accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank until the Facility is decommissioned, in violation of 30 TEX. ADMIN. CODE § 290.46(n)(1).
- 7. As evidenced by Finding of Fact No. 2.f, the Respondent failed to keep on file copies of well completion data, as defined in 30 TEX. ADMIN. CODE § 290.41(c)(3)(A), for as long as the well remains in service, in violation of 30 TEX. ADMIN. CODE § 290.46(n)(3).
- 8. As evidenced by Finding of Fact No. 2.g, 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)(B)(v), and (f)(3)(E)(iv).
- 9. As evidenced by Finding of Fact No. 2.h, the Respondent failed to protect all well units with an intruder-resistant fence with a lockable gate or enclose the well in a locked, ventilated well house to exclude possible contamination or damage to the facilities by trespassers, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(3)(O) and TCEQ Agreed Order Docket No. 2015-0950-PWS-E, Ordering Provision No. 2.e.iv.
- 10. 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.
- 11. An administrative penalty in the amount of \$13,914 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 Respondent paid the \$13,914 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. 11 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: VADHWANI ENTERPRISES INC., Docket No. 2020-1183-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:
 - a. Within 30 days after the effective date of this Order:
 - i. Monitor the disinfectant residual at representative locations throughout the distribution system at sites designated in the Facility's monitoring plan at least once every seven days, in accordance with 30 TEX. ADMIN. CODE § 290.110. This provision will be satisfied upon three months of compliant monitoring;
 - ii. Compile and maintain properly completed water works operation and maintenance records, including records of backflow prevention device programs, in accordance with 30 TEX. ADMIN. CODE § 290.46; and
 - iii. Update the Facility's operational guidance and conduct employee training to ensure that all backflow prevention assemblies are tested upon installation and on an annual basis by a recognized backflow prevention assembly tester and certified that they are operating within specifications, in accordance with 30 TEX. ADMIN. CODE § 290.44.
 - b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.g below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.ii and 2.a.iii.
 - c. Within 60 days after the effective date of this Order, ensure that all backflow prevention assemblies are tested upon installation and on an annual basis by a recognized backflow prevention assembly tester and certify that they are operating within specifications, including but not limited to the backflow prevention device at the carbonated soda dispenser, in accordance with 30 TEX. ADMIN. CODE § 290.44.
 - d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.g below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.c.
 - e. Within 90 days after the effective date of this Order:

- i. Compile and maintain at the public water system accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank, in accordance with 30 TEX. ADMIN. CODE § 290.46; and
- ii. Keep on file copies of well completion data for the well as defined in 30 TEX. ADMIN. CODE § 290.41(c)(3)(A), in accordance with 30 TEX. ADMIN. CODE § 290.46.
- f. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.g below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.e.i and 2.e.ii.
- g. Within 135 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 No. 2.a.i. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

Water Section Manager San Antonio Regional Office Texas Commission on Environmental Quality 14250 Judson Road San Antonio, Texas 78233-4480

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by 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.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
- 7. 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.
- 8. 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.
- This Order may be executed in separate and multiple counterparts, which together shall 9. constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
- 10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For	the Con	nmission
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	MAN	

Date

For the Executive Director

1/25/2022 Date

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

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

- A negative impact on compliance history:
- Greater scrutiny of any permit applications submitted; .
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, . additional penalties, and/or attorney fees, or to a collection agency:
- Increased penalties in any future enforcement actions; .
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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

Signature

IPPAR

Name (Printed or typed) Authorized Representative of VADHWANI ENTERPRISES INC.

Date

Title

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