Order Type: Findings Agreed Order **Findings Order Justification:** Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s). Media: MLM - PWS, WO **Small Business:** No Location(s) Where Violation(s) Occurred: City of Baird PWS, 242 Walnut Street, Baird, Callahan 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: March 18, 2022 Comments Received: No **Penalty Information** Total Penalty Assessed: \$35,405

Total Penalty Assessed: \$35,405 Total Paid to General Revenue: \$0 Payment Plan: N/A Supplemental Environmental Project ("SEP") Conditional Offset: \$35,405 Name of SEP: Public Water Supply Improvements (Compliance) 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: September 17, 2020 through September 25, 2020 and November 16, 2020 through December 4, 2020 Date(s) of NOE(s): November 16, 2020 and December 4, 2020

Violation Information

1. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director ("ED") upon request [30 TEX. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(i)(I), (f)(3)(B)(iii), (f)(3)(B)(iv), (f)(3)(D)(i), (f)(3)(E)(ii), and (f)(3)(E)(iv)].

2. Failed to flush all dead-end mains at monthly intervals [30 Tex. Admin. Code § 290.46(l)].

3. Failed to inspect the Facility's clearwell annually [30 TEX. ADMIN. CODE § 290.46(m)(1)(A)].

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

5. Failed to create a nitrification action plan ("NAP") for a system distributing chloraminated water [30 Tex. Admin. Code § 290.46(z)].

6. Failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled [30 TEX. ADMIN. CODE § 290.110(c)(5)].

7. Failed calibrate the Facility's pH meter according to manufacturer specifications at least once each day and check with at least one buffer each time a series of samples is run [30 TEX. ADMIN. CODE § 290.46(s)(2)(A)].

8. Failed to calibrate the Facility's benchtop turbidimeter with primary standards at least once every 90 days and check the calibration with secondary standards each time a series of samples is tested [30 TEX. ADMIN. CODE § 290.46(s)(2)(B)(i) and (s)(2)(B)(ii)].

9. Failed calibrate the Facility's five on-line turbidimeters with primary standards at least once every 90 days and check the calibration with a primary standard, secondary standard, or manufacturer's proprietary calibration confirmation device or by comparing the results from the on-line unit with the results from a properly calibrated benchtop unit at least once every week [30 TEX. ADMIN. CODE § 290.46(s)(2)(B)(iii) and (s)(2)(B)(iv)].

9. Failed to verify the accuracy of the manual disinfectant residual analyzers at least once every 90 days using chlorine solutions of known concentrations and failed to verify the accuracy of analyzers used to determine the effectiveness of chloramination at least once every 90 days in accordance with the manufacturer's recommendations [30 TEX. ADMIN. CODE § 290.46(s)(2)(C)(i) and (s)(2)(D)].

11. Failed to verify the accuracy of the Facility's continuous disinfectant analyzer at least once every seven days with a chlorine solution of known concentration or by comparing the results from the on-line analyzer with the result of approved benchtop method [30 TEX. ADMIN. CODE § 290.46(s)(2)(C)(ii)].

12. Failed to provide vacuum breakers on each hose bibb within the plant facility [30 TEX. ADMIN. CODE § 290.42(d)(2)(A)].

13. Failed to ensure that the Facility's clearwell roof hatch remains locked except during inspections and maintenance [30 TEX. ADMIN. CODE § 290.43(c)(2)].

14. Failed to maintain the Facility's storage tanks in strict accordance with current American Water Works Association ("AWWA") standards with an overflow pipe that terminates downward with a gravity-hinged and weight cover tightly fitted with no gap over 1/16 inch [30 TEX. ADMIN. CODE § 290.43(c)(3)].

15. Failed to ensure the raw water pump station and all appurtenances are installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates [30 TEX. ADMIN. CODE § 290.41(e)(5).

16. Failed to provide all chemical bulk storage facilities and day tanks with a label that identifies the tank's contents and a device that indicates the amount of chemical remaining in the tank [30 TEX. ADMIN. CODE § 290.42(f)(1)(C)].

17. Failed to provide chemical bulk storage facilities and day tanks that are designed to minimize the possibility of leaks and spills [30 TEX. ADMIN. CODE § 290.42(f)(1)(E)].

18. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment [30 TEX. ADMIN. CODE § 290.46(m)].

19. Failed to ensure the water treatment plant and all appurtenances are enclosed by an intruder-resistant fence with lockable gates or in a locked building in the fence line [30 TEX. ADMIN. CODE § 290.42(m)].

20. Failed to provide forced air ventilation, which includes high level and floor level screened and louvered vents, a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent, and a fan switch outside, for enclosures containing more than one 150-pound cylinder of chlorine [30 TEX. ADMIN. CODE § 290.42(e)(4)(C)].

21. Failed to use a chemical feed system designed to minimize the possibility of leaks and spills and provide protection against backpressure and siphoning [30 TEX. ADMIN. CODE § 290.42(f)(2)(D)].

22. Failed to provide a full-face self-contained breathing apparatus ("SCBA") or supplied air respirator that meets Occupational Safety and Health Administration ("OSHA") standards for construction and operation, and a small bottle of fresh ammonia solution (or approved equal) for testing for chlorine leakage that is readily accessible outside the chlorinator room and immediately available to the operator in the event of an emergency [30 TEX. ADMIN. CODE § 290.42(e)(4)(A)].

23. Failed to house the gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or partitions separating all mechanical and electrical equipment from the chlorine facilities [30 TEX. ADMIN. CODE § 290.42(e)(4)(B)].

24. Failed to properly monitor the turbidity level of the combined filter effluent ("CFE") at least every four hours that the system serves water to the public [30 TEX. ADMIN. CODE \S 290.111(e)(3)(B)].

25. Failed to maintain a minimum disinfectant residual of 0.5 milligrams per liter ("mg/L") of chloramine (measured as total chlorine) throughout the distribution system and in each finished water storage tank at all times [30 TEX. ADMIN. CODE §§ 290.46(d)(2)(B) and 290.110(b)(4) and TEX. HEALTH & SAFETY CODE § 341.0315(c)].

26. Failed to provide toilet and hand washing facilities with established standards of good public health engineering practices at all installations requiring frequent visits by operating personnel [30 TEX. ADMIN. CODE § 290.42(h)].

27. Failed to use a water works operator who holds an applicable, valid license issued by the ED [30 Tex. Admin. Code § 290.46(e) and Tex. Health & Safety Code § 341.033(a)].

28. Failed to provide facilities for determining the amount of disinfectant used daily and the amount of disinfectant remaining for use [30 TEX. ADMIN. CODE § 290.42(e)(3)(D)].

29. Failed to prevent an unauthorized discharge of sewage, municipal waste, recreational waste, agricultural waste, or industrial waste into or adjacent to any water in the state [TEX. WATER CODE § 26.121(a)(1)].

30. Failed to submit a Surface Water Monthly Operating Report ("SWMOR") with the required turbidity and disinfectant residual data to the ED by the tenth day of the month following the end of the reporting period [30 TEX. ADMIN. CODE §§ 290.110(e)(2) and (e)(6) and 290.111(h)(2)(B) and (h)(9)].

31. Failed to provide a consumer notification of lead tap water monitoring results to persons served at all the site (taps) that were tested, and failed to mail a copy of the consumer notification of tap results to the ED along with certification that the consumer notification has been distributed in a manner consistent with TCEQ requirements [30 TEX. ADMIN. CODE § 290.117(i)(6) and (j)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures:

a. By September 18, 2020, maintained a minimum total chlorine residual of 0.05 mg/L throughout the distribution system and in each finished water storage tank.

b. By November 9, 2020:

i. Provided each operator with a key to the toilet facility located next to the surface water treatment plant; and

ii. Began using a licensed water works operator to perform all process control duties.

c. By November 12, 2020, purchased current primary and secondary standards.

d. By January 26, 2021, provided labels identifying the contents of the liquid ammonium sulfate ("LAS") stock tank at the disinfection facility at the top of the hill on Lake Baird and the LAS day tank at the disinfection facility at the 0.204 million-gallon ground storage tank ("GST").

Technical Requirements:

1. The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).

2. The Order will also require the Respondent to:

a. Within 30 days:

i. Create an organized file system for storing operating records and compile and maintain properly completed water works operation and maintenance records, including records for the amount of the amount of each chemical used each day, the disinfectant residual monitoring results from the distribution system, the calibration

records for flow meters, the results of microbiological and chemical analyses, and copies of customer service inspection reports;

ii. Modify the flushing program to ensure that all dead-end mains are flushed at monthly intervals;

iii. Conduct an inspection of the clearwell;

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

v. Create an up-to-date and complete system-specific NAP;

vi. Collect chloramine effectiveness samples to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled. This provision will be satisfied upon six consecutive months of compliant monitoring;

vii. Calibrate the pH meter according to manufacturer specifications at least once each day and check with at least one buffer each time a series of samples is run;

viii. Calibrate the benchtop turbidimeter with primary standards and check the calibration with secondary standards each time a series of samples is tested. This provision will be satisfied upon one month of compliant monitoring;

ix. Calibrate the five on-line turbidimeters with primary standards and check the calibration with a primary standard, secondary standard, or manufacturer's proprietary calibration confirmation device or by comparing the results from the on-line unit with the results from a properly calibrated benchtop unit at least once every week. This provision will be satisfied upon one month of compliant monitoring;

x. Verify the accuracy of the manual disinfectant residual analyzers using chlorine solutions of known concentrations and verify the accuracy of analyzers used to determine the effectiveness of chloramination in accordance with the manufacturer's recommendations and provide a verification key for each analyzer;

xi. Verify the accuracy of the Facility's continuous disinfectant analyzer at least once every seven days with a chlorine solution of known concentration or by comparing the results from the on-line analyzer with the result of approved benchtop method;

xii. Provide a vacuum breaker for each of the two hose bibbs at the water treatment plant;

xiii. Ensure the raw water pump station and all appurtenances are installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates, including but not limited to repairing the broken windows at the raw water pump station building;

xiv. Provide a LAS day tank at the disinfection facility at the 0.204 million-gallon GST that is designed to minimize the possibility of leaks and spills;

xv. Ensure the water treatment plant and all appurtenances are enclosed by an intruderresistant fence with lockable gates or in a locked building in the fence line, including but not limited to providing an intruder-resistant fence for the sodium permanganate tank at the raw water pump station;

xvi. Cease the unauthorized discharge from the sodium permanganate tank at the raw water pump station and implement controls to prevent future unauthorized discharges;

xvii. Provide an SCBA that meets OSHA standards for construction and operation at each disinfection facility and provide a small bottle of fresh ammonia solution at each disinfection facility;

xviii. Monitor the CFE on the clearwell fill line;

xix. Update the Facility's operational guidance and conduct employee training to ensure that self-reporting requirements are properly accomplished, including the timely submission of signed and certified SWMORs;

xx. Provide consumer notification of lead tap water monitoring results to persons served at all sites (taps) that were tested during the January 1, 2017 through December 31, 2019 monitoring period. Submit to the ED a sample copy of the consumer notification and certification that consumer notification was distributed in a manner consistent with TCEQ requirements; and

xxi. Begin submitting complete and accurate SWMORs with the required turbidity and disinfection residual data to the ED by the tenth day of the month following the end of each reporting period. This provision will be satisfied upon six consecutive months of compliant reporting.

b. Within 45 days, submit written certification to demonstrate compliance with a.i. through a.v., a.vii., and a.x. through a.xx.

c. Within 60 days:

i. Ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certify that they are operating within specifications, including but not limited to the BPAs at Parker Funeral Home, Callahan County Jail, FedEx Freight, Homestead Nursing and Rehab (three), Callahan County Farmers Co-Op, the wastewater treatment plant, and at each lift station;

ii. Provide a lock for the clearwell roof hatch and ensure the roof hatch remains locked except during inspections and maintenance;

iii. Provide an overflow pipe with a weighted cover that fits tightly with no gap over 1/16 inch in accordance with AWWA standards for Tank No. 2 and the clearwell at the water treatment plant; and

iv. Repair the fans in the gas chlorine rooms at the water treatment plant and at the disinfection facility at the top of the hill on Lake Baird.

d. Within 75 days, submit written certification to demonstrate compliance with a.viii., a.ix., and c.

e. Within 90 days:

i. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including removing the cobwebs from the raw water pumps and conducting general maintenance at the raw water pump station building, draining the standing water at the water treatment plant, conducting general housekeeping and removing the dead mice and mouse droppings at the Tank No. 3 disinfection facility, conducting general housekeeping at the LAS tank storage room and repairing the gas chlorine scales in the gas chlorine room, removing the unused equipment, including unused chemical tanks, and overgrowth of vegetation at the disinfection facility at the top of the hill on Lake Baird, and removing the overgrowth of vegetation at the sludge lagoon;

ii. Repair the leak on the polyvinyl chloride chlorine make-up water line inside the LAS day tank room at the disinfection facility at the 0.204 MG GST; and

iii. Properly house the gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or partitions separating all mechanical and electrical equipment from the chlorine facilities.

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

g. Within 225 days, submit written certification to demonstrate compliance with a.vi. and a.xxi.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Steven Hall, Enforcement Division, Enforcement Team 2, MC 219, (512) 239-0855; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

TCEQ SEP Coordinator: Betty Sanders, SEP Coordinator, Litigation Division, MC 175, (512) 239-3992

Respondent: The Honorable Jim Dobbs, Mayor, City of Baird, 328 Market Street, Baird, Texas 79504-6410

Lori Higgins, City Administrator, City of Baird, 328 Market Street, Baird, Texas 79504-6410

Respondent's Attorney: N/A

S COM MISSING	Policy R	Pe Revision 4 (April 2014	-	Iculatio	n Worksł	neet (PC	-	ision September	r 1, 2019
DATES	Assigned		- · -	2 0 2020			1		
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RESPO		TY INFORMATI							
Reg	g. Ent. Ref. No.	City of Baird (PC RN101387462	.vv NO. 1)						
Facili	ty/Site Region	3-Abilene			Major/M	linor Source	Minor		
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PAYA	BLE PENALT	Y						\$	32,805
								<u>т</u>	

		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	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 (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 (<i>number of audits for which violations were disclosed</i>)	0	0%	
				[]	
		Environmental management systems in place for one year or more	No	0%	
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
		Participation in a voluntary pollution reduction program	No	0%	
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
		Adjustment Per	centage (Sub	total 2)	30%
>> Re	peat Violator	(Subtotal 3)			
	N/A	Adjustment Per	centage (Sub	total 3)	0%
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)			
	Satisfactory I	Performer Adjustment Per	centage (Sub	total 7)	0%
>> Co	mpliance Hist	ory Summary			
	Compliance History Notes	Enhancement for two NOVs with the same/similar violations and one agreed orde denial of liability.	er containing a		
		Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7)	30%
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Compliance History Worksheet Compliance History Site Enhancement (Subtotal 2)

Screening Date 2-Dec-2020 Respondent City of Baird (PCW No. 1)

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

the current enforcement action (number of NOVs meeting criteria)

Case ID No. 60117

Reg. Ent. Reference No. RN101387462

Media Public Water Supply

Other written NOVs

Enf. Coordinator Aaron Vincent

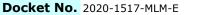
Component Number of...

NOVs

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

PCW



Adjust.

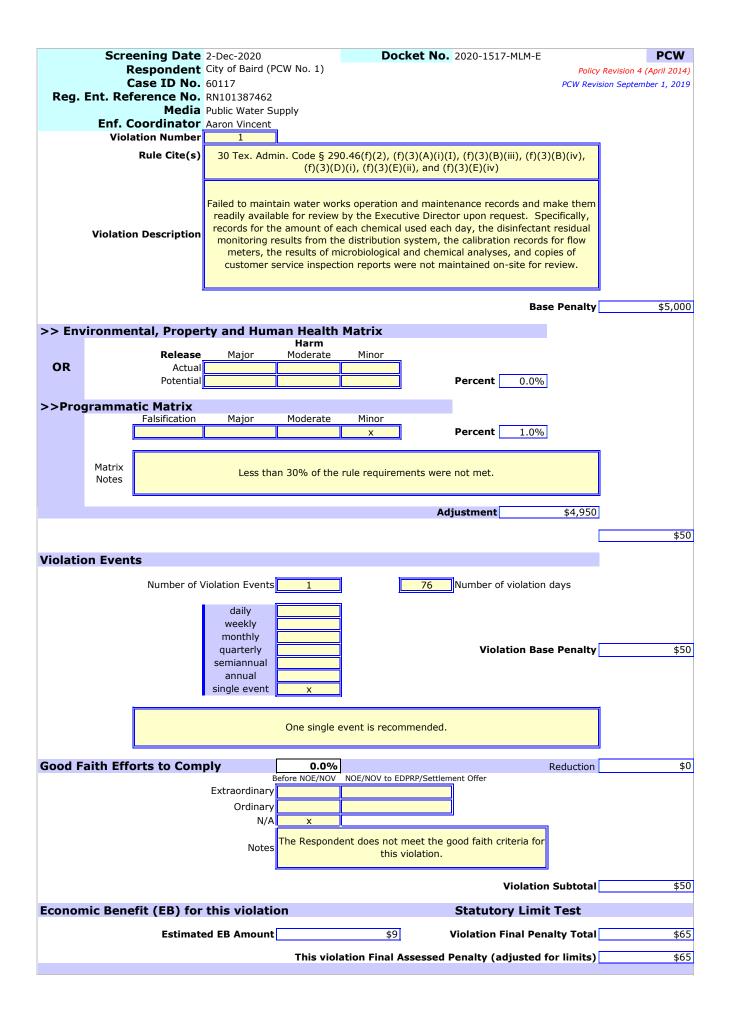
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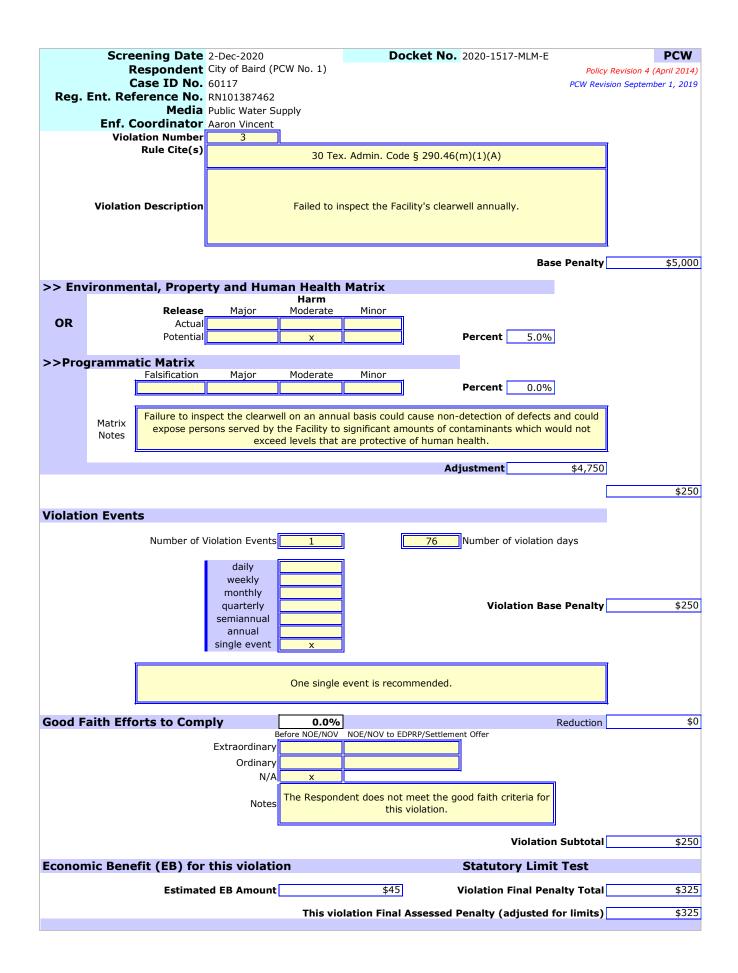
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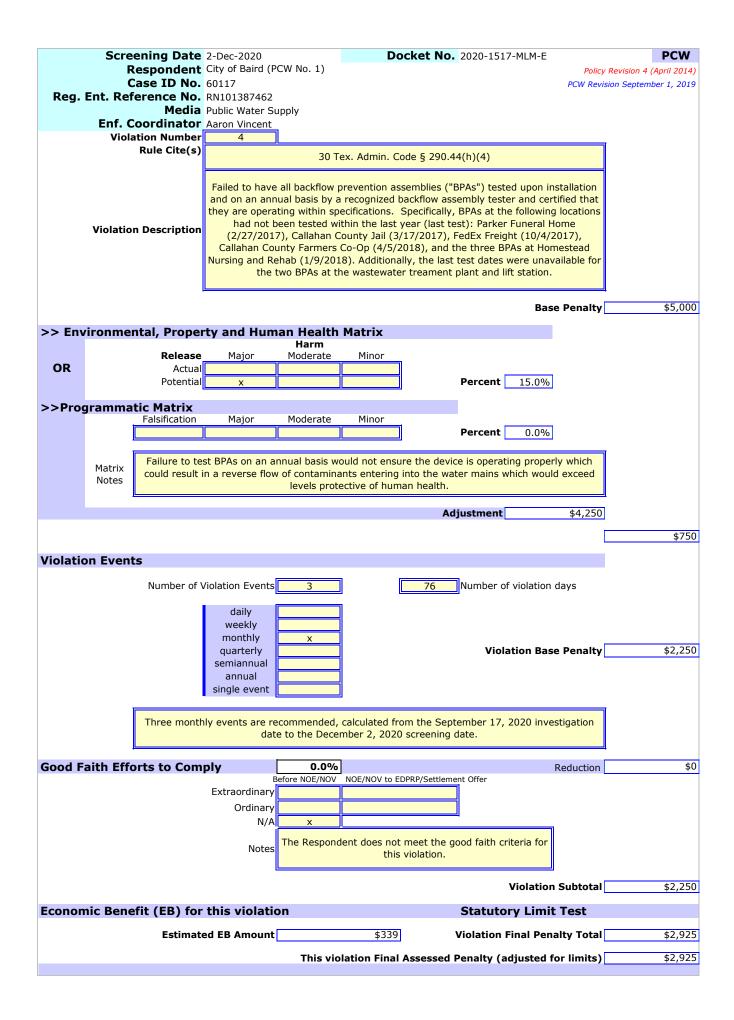
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60117						
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						5.0	15
Item Description		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	I						
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$100	17-Sep-2020	25-Jun-2022	1.77	\$9	n/a	\$9
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
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		ening Date	2-Dec-2020 City of Baird (PCW No. 1)	Docket No.	2020-1517-MLM-E	o. //	PCW
		Case ID No.					Revision 4 (April 2014) sion September 1, 2019
Reg.		ference No.	RN101387462				, , , , , , , , , , , , , , , , , , , ,
	Enf (Public Water Supply				
		Coordinator ation Number	Aaron Vincent				
		Rule Cite(s)) Tex. Admin. Code § 290	46(1)		
				Tex. Admin. Code g 250	.+0(1)		
	Violatio	n Description	Failed to flush	n all dead-end mains at m	nonthly intervals.		
					Base	e Penalty	\$5,000
>> Env	vironme	ntal, Proper	ty and Human Health	Matrix			
		Release	Harm Major Moderate	Minor			
OR		Actual	-				
		Potential	X		Percent 5.0%		
>>Pro	aramma	tic Matrix					
	9	Falsification	Major Moderate	Minor			
					Percent 0.0%		
							I
	Matrix Notes		n dead-end mains at monthly amount of contaminants whi				
	Notes	a significant			is protective of fidinal	i neaith.	
				Ad	justment	\$4,750	
						+ ./. = =	+250
							\$250
Violatio	on Even	ts					
		Number of \	/iolation Events 1	76	Number of violation	davs	
						aayo	
			daily				
			weekly monthly				
			quarterly x	j	Violation Base	e Penalty	\$250
			semiannual				
			annual single event				
				<u>ــــــــــــــــــــــــــــــــــــ</u>			
		One quarterly	v event is recommended, calo	culated from the Septemb	oer 17, 2020 investiga	tion date	
			to the Decem	ber 2, 2020 screening dat	te.		
Good F	aith Fff	orts to Com	ply 0.0%	7		Reduction	\$0
Good I			Before NOE/NOV			Reduction	ΨŬ
			Extraordinary				
			Ordinary N/A x				
				<u>II</u>			
			Notes The Respon	dent does not meet the g this violation.	ood faith criteria for		
					Violation	Subtotal	\$250
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	Test	
			ed EB Amount	\$9	Violation Final Pena		\$325
		Lotinate				-	
			This vic	plation Final Assessed	Penalty (adjusted f	or limits)	\$325

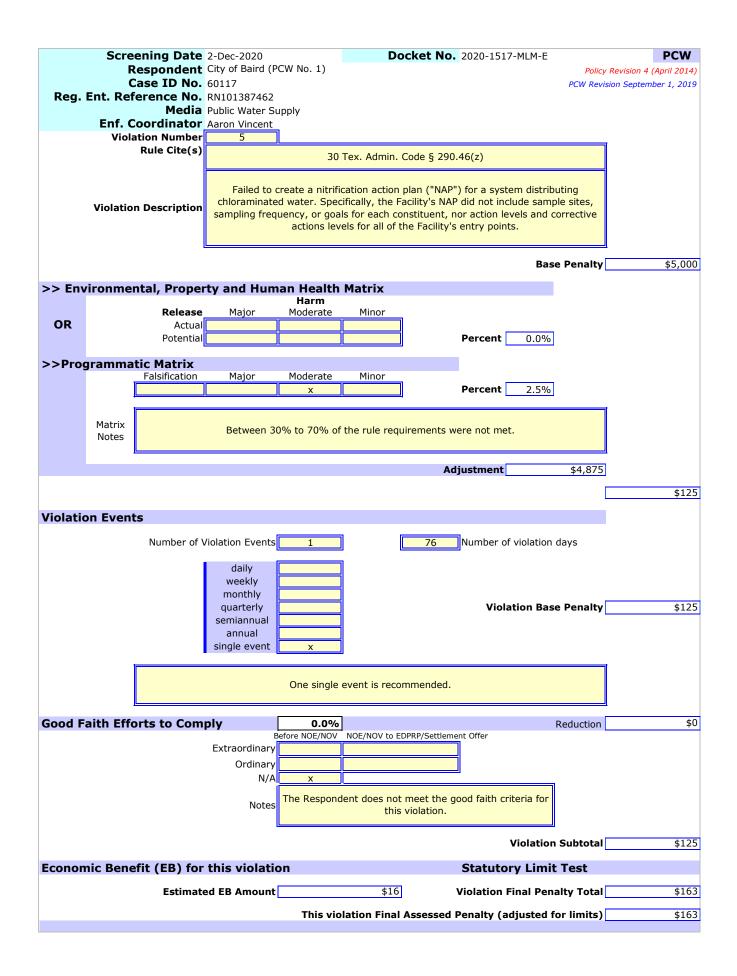
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.		,					
Reg. Ent. Reference No.							
	Public Water S	upply				Percent Interest	Years of
Violation No.	2						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rein beschption							
Delayed Costs							
Equipment	r			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
Lingineering, construction				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)	\$100	17-Sep-2020	25-Jun-2022	1.77	\$9	n/a	\$9
Notes for DELAYED costs					I from the investig	program to ensure ation date to the est	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	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		\$100			TOTAL		\$9



of Baird (PC .7 D1387462 Ic Water Sup em Cost D	-	Final Date	Yrs	Interest Saved	Percent Interest 5.0 Costs Saved	Years of Depreciation 1! EB Amount
01387462 c Water Sup		Final Date	0.00	Interest Saved	5.0 Costs Saved	Depreciation 1! EB Amount
01387462 c Water Sup		Final Date	0.00	Interest Saved	5.0 Costs Saved	Depreciation 1 EB Amount
c Water Sup		Final Date	0.00	Interest Saved	5.0 Costs Saved	Depreciation 1! EB Amount
em Cost D	Date Required	Final Date	0.00	\$0	5.0 Costs Saved	1! EB Amount
em Cost D	Date Required	Final Date	0.00	\$0	Costs Saved	EB Amount
			0.00	\$0		
					\$0	
					\$0	
					\$0	
					\$11	
				+0		\$0
				\$0	\$0	\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
					· · · · · ·	\$0
						\$0
+ 44	17.0 2020	25.1 2022				<u>\$0</u> \$4
delayed cos						alculated from
				item (eveent fer	ana tima avaidad	a a ata)
ANNUAL	.IZE avoided c	osts before en	tering	пет (ехсерт тог	one-time avoided	COSTS
ANNUAL	IZE avoided c	osts before en	0.00	\$0	\$0	\$0
ANNUAL	IZE avoided c	osts before en		<u> </u>		
	IZE avoided c	osts before en	0.00	\$0	\$0	\$0
	IZE avoided c	osts before en	0.00	\$0 \$0	\$0 \$0	\$0 \$0
	IZE avoided c	osts before en	0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
	IZE avoided c	osts before en	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
	·	delayed cost includes the e	delayed cost includes the estimated amour	delayed cost includes the estimated amount to co	0.00 \$0 0.00 \$0 \$41 17-Sep-2020 25-Jun-2022 1.77 \$4 delayed cost includes the estimated amount to conduct an annual clear 1000 \$000 \$000	0.00 \$0 n/a 0.00 \$0 n/a



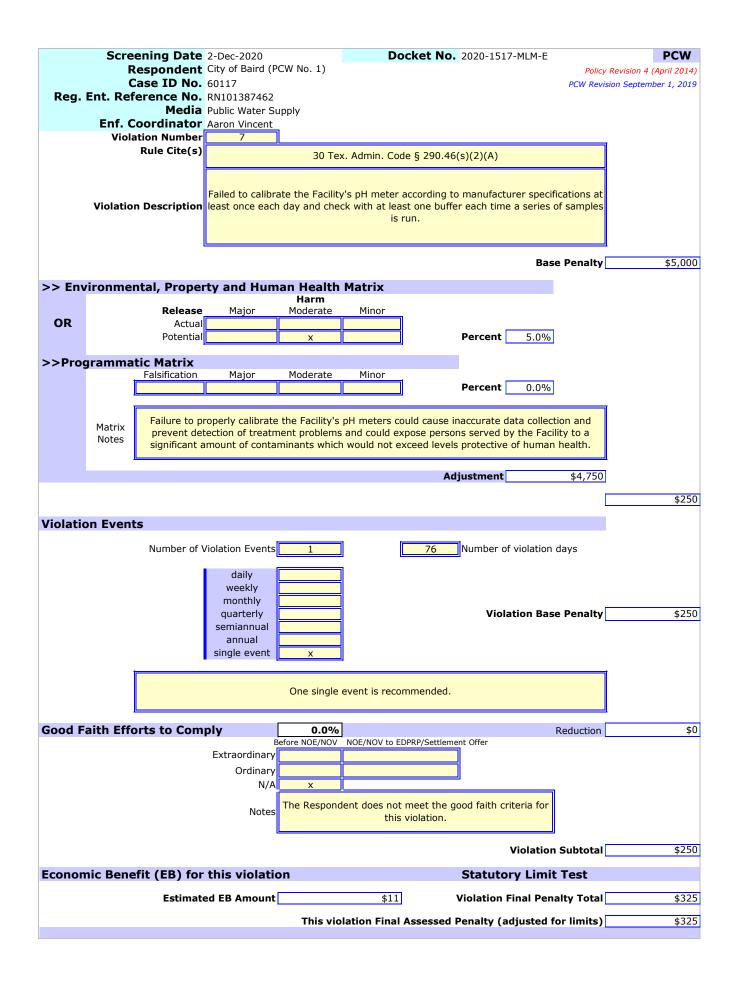
	E	conomic	Benefit	Wo	rksheet		
Respondent	, ,	PCW No. 1)					
Case ID No.							
Reg. Ent. Reference No. Media	Public Water S					Percent Interest	Years of
Violation No.	4					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		1		7			
Equipment				0.00	\$0	\$0	\$0
Buildings		<u> </u>		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction Land				0.00	\$0 \$0	\$0	\$0 \$0
Record Keeping System				0.00	\$0	n/a n/a	\$0
Training/Sampling	\$100	17-Sep-2020	25-lun-2022	1.77	\$9	n/a	\$9
Remediation/Disposal	\$100	17 Sep 2020	25 Juli 2022	0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$279	17-Sep-2020	25-Jul-2022	1.85	\$26	n/a	\$26
Notes for DELAYED costs	guidance ar annual ba speci	id conduct employ isis by a recognize fications, calculate needed) delayed	vee training to e ed backflow asso ed from the inve cost includes th	ensure t embly t estigatione ne estim	that all BPAs are to ester and certified on date to the estin nated amount to te	update the Facility' ested upon installati that they are opera mated date of comp est the BPAs (\$31 x date of compliance.	on and on an ating within liance.
Avoided Costs	ANNUA	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	\$301	17-Sep-2020	2-Dec-2020	0.21	\$3	\$301	\$304
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs			due date of the	earliest	× ·	x nine locations + \$ ted from the investi	
Approx. Cost of Compliance		\$680			TOTAL		\$339



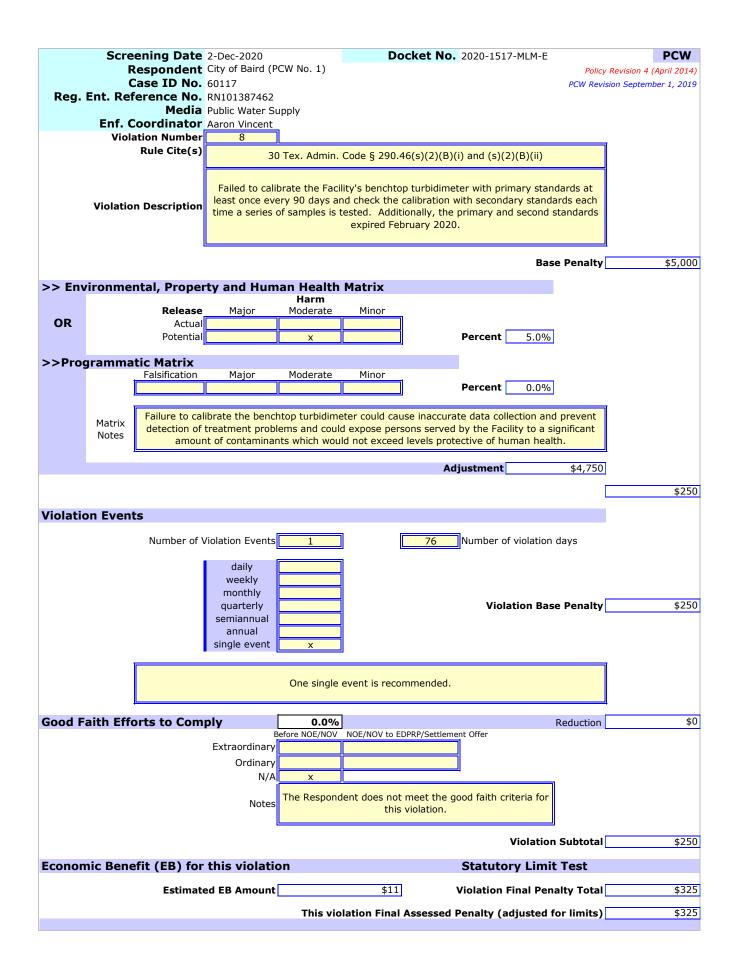
	E	conomic	Benefit	Wo	r ksheet		
Respondent					· · ·		
Case ID No.		,					
eg. Ent. Reference No.							
							Years of
	Public Water S	supply				Percent Interest	
Violation No.	. 5						Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Item Description	•						
Delayed Costs	5 	1			+ 0	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/Construction				0.00	\$0	-	\$0
Land				0.00	\$0	n/a	<u>\$0</u> \$0
Record Keeping System				0.00	<u>\$0</u> \$0	n/a n/a	<u>\$0</u> \$0
Training/Sampling Remediation/Disposal				0.00	\$0	n/a	<u>\$0</u> \$0
<i>,</i> ,	1						
Dormit Costs							
Permit Costs Other (as needed)	\$180	17-Sep-2020		0.00	\$0 \$16	n/a n/a	\$0 \$16
	The delayed	cost includes the	estimated amo	0.00 1.77 unt to p	\$0 \$16 rovide an up-to-da	n/a	\$0 \$16 ystem-specific
Other (as needed)	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 unt to p ation da	\$0 \$16 rovide an up-to-da te to the estimate	n/a n/a ate and complete, s	\$0 \$16 /stem-specific e.
Other (as needed) Notes for DELAYED costs	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 unt to p ation da	\$0 \$16 rovide an up-to-da te to the estimate	n/a n/a ate and complete, so d date of complianc	\$0 \$16 /stem-specific e.
Other (as needed) Notes for DELAYED costs Avoided Costs	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 unt to p ation da	\$0 \$16 rovide an up-to-da ite to the estimate item (except for \$0 \$0	n/a n/a ate and complete, so d date of compliance r one-time avoider \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 1.77 1.77 1.77 1.77 1.77 0.00 0.00 0.00 0.00	\$0 \$16 rovide an up-to-da te to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, sy d date of compliance one-time avoide \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 1.77 1.77 1.77 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$16 rovide an up-to-da te to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, sy d date of complianc one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 unt to p ation da tering 0.00 0.00 0.00 0.00 0.00	\$0 \$16 rovide an up-to-da te to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, sy d date of complianc cone-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 1.77 1.77 1.77 1.77 1.77 1.77	\$0 \$16 rovide an up-to-da ite to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, so d date of compliance one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 unt to p ation da tering 0.00 0.00 0.00 0.00 0.00	\$0 \$16 rovide an up-to-da te to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, sy d date of complianc cone-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 1.77 1.77 1.77 1.77 1.77 1.77	\$0 \$16 rovide an up-to-da ite to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, so d date of compliance one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 1.77 1.77 1.77 1.77 1.77 1.77	\$0 \$16 rovide an up-to-da ite to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, so d date of compliance one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delayed	cost includes the NAP, calculated fro	estimated amore of the second se	0.00 1.77 1.77 1.77 1.77 1.77 1.77 1.77	\$0 \$16 rovide an up-to-da ite to the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ate and complete, s d date of complianc \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$16 ystem-specific e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2020-1517-MLM-E	PCW
		lespondent Case ID No.	City of Baird (PCW No. 1) 60117		Policy Revision 4 (April 2014) PCW Revision September 1, 2019
Reg.		erence No.	RN101387462		, , ,
	Enf. C		Public Water Supply Aaron Vincent		
		ation Number	6		
		Rule Cite(s)	30 Te	ex. Admin. Code § 290.110(c)(5)	
	Violatio	n Description		e effectiveness sampling to ensure that monoch	
	Tolatio	in Description	is the prevailing chlor	ramine species and that nitrification is controlle	d.
				Base	Penalty \$5,000
>> Env	vironme	ntal, Propei	ty and Human Health	Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual			
		Potential		x Percent 3.0%	
>>Prog	gramma	tic Matrix Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix			ess sampling could lead to excessive nitrification persons served by the Facility to be exposed to	
	Notes		-	ch would not exceed levels protective of human	
				Adjustment	\$4,850
					\$150
Violati	on Even	ts			
		Number of \	/iolation Events 1	76 Number of violation of	lays
			daily]]	
			weekly		
			monthly guarterly	Violation Base	Penalty \$150
			semiannual		· · · · · · · · · · · · · · · · · · ·
			annual single event x		
				9	
			One single	event is recommended.	
Good F	aith Effo	orts to Com			Reduction \$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			Notes The Respond	dent does not meet the good faith criteria for this violation.	
				Violation	Subtotal \$150
Econor	nic Rene	fit (FR) for	this violation	Statutory Limit	
		Estimation	ed EB Amount	\$113 Violation Final Pena	
			This vio	plation Final Assessed Penalty (adjusted fo	or limits) \$195

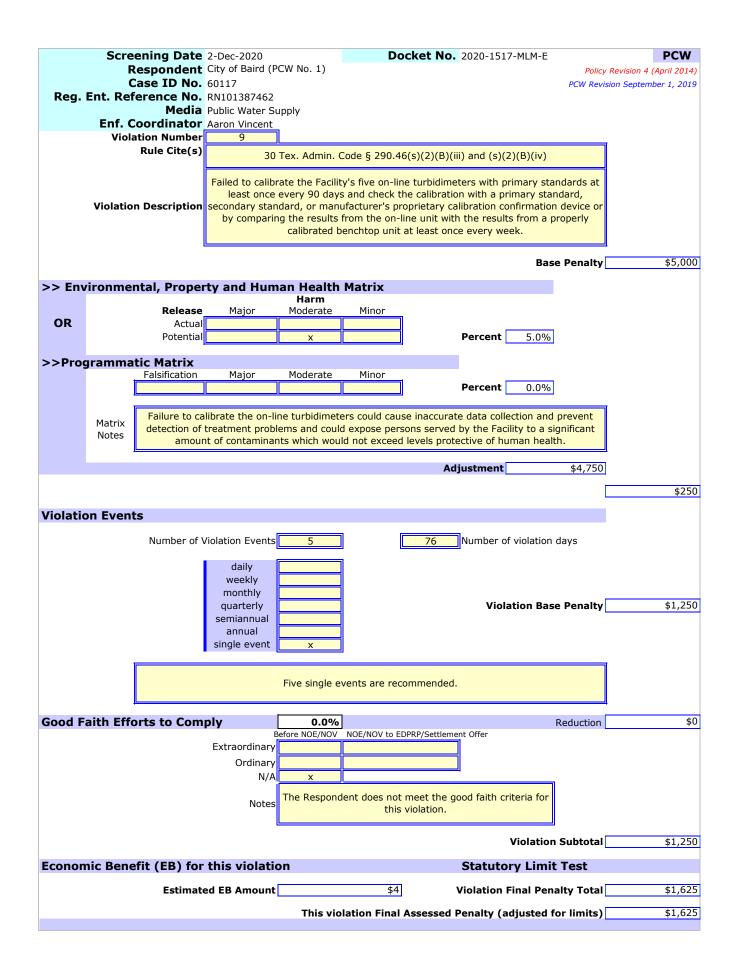
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (I	PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
U	Public Water S					Percent Interest	Years of Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				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	\$100	17-Sep-2020	6-Jan-2023	2.30	\$12	n/a	\$12
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 c	ost includes the e		nt to co		tectiveness samples	to ensure that
Notes for DELAYED costs	monochloram	inves	ng chloramine s tigation date to	pecies a the est	and that nitrificatio imated date of cor	n is controlled, calconpliance.	ulated from the
Avoided Costs	monochloram	ine is the prevaili inves	ng chloramine s tigation date to	pecies a the est tering	and that nitrificatio imated date of cor item (except for	n is controlled, calco npliance. r one-time avoide	ulated from the
Avoided Costs Disposal	monochloram	ine is the prevaili inves	ng chloramine s tigation date to	pecies a the est tering	and that nitrificatio imated date of cor item (except for \$0	n is controlled, calconpliance. r one-time avoide \$0	ulated from the d costs) \$0
Avoided Costs Disposal Personnel	monochloram	ine is the prevaili inves	ng chloramine s tigation date to	the est the est the old tering 0.00	and that nitrificatio imated date of cor item (except for \$0 \$0	n is controlled, calcon npliance. r one-time avoide \$0 \$0	ulated from the d costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	monochloram	ine is the prevaili inves	ng chloramine s tigation date to	the est the est tering 0.00 0.00 0.00	imated date of cor item (except for \$0 \$0 \$0 \$0	n is controlled, calco npliance. r one-time avoider \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	monochloram	ine is the prevaili inves	ng chloramine s tigation date to	pecies a the est tering 0.00 0.00 0.00 0.00	and that nitrificatio imated date of cor item (except for \$0 \$0 \$0 \$0 \$0	n is controlled, calco npliance. r one-time avoide \$0 \$0 \$0 \$0	ulated from the d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU	ine is the prevailining investment of the second se	ng chloramine s tigation date to osts before er	pecies a the est 0.00 0.00 0.00 0.00 0.00 0.00	ind that nitrificatio imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n is controlled, calco npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	ulated from the s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	monochloram	ine is the prevaili inves	ng chloramine s tigation date to	pecies a the est 0.00 0.00 0.00 0.00 0.00 0.00 0.21	ind that nitrificatio imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n is controlled, calco npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ulated from the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$101
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU	ine is the prevailining investment of the second se	ng chloramine s tigation date to osts before er	pecies a the est 0.00 0.00 0.00 0.00 0.00 0.00	ind that nitrificatio imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n is controlled, calco npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	ulated from the s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	ANNU/	ine is the prevailin inves	ng chloramine s tigation date to osts before er 2-Dec-2020 estimated amoung chloramine s	pecies a the est the est tering 0.00 0.00 0.00 0.00 0.00 0.00 0.21 0.00 0.00 to copecies a	ind that nitrificatio imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$1 \$0 Ulect chloramine ef	n is controlled, calcunpliance.	ulated from the \$0 \$0 \$0 \$0 \$0 \$101 \$0 to ensure tha



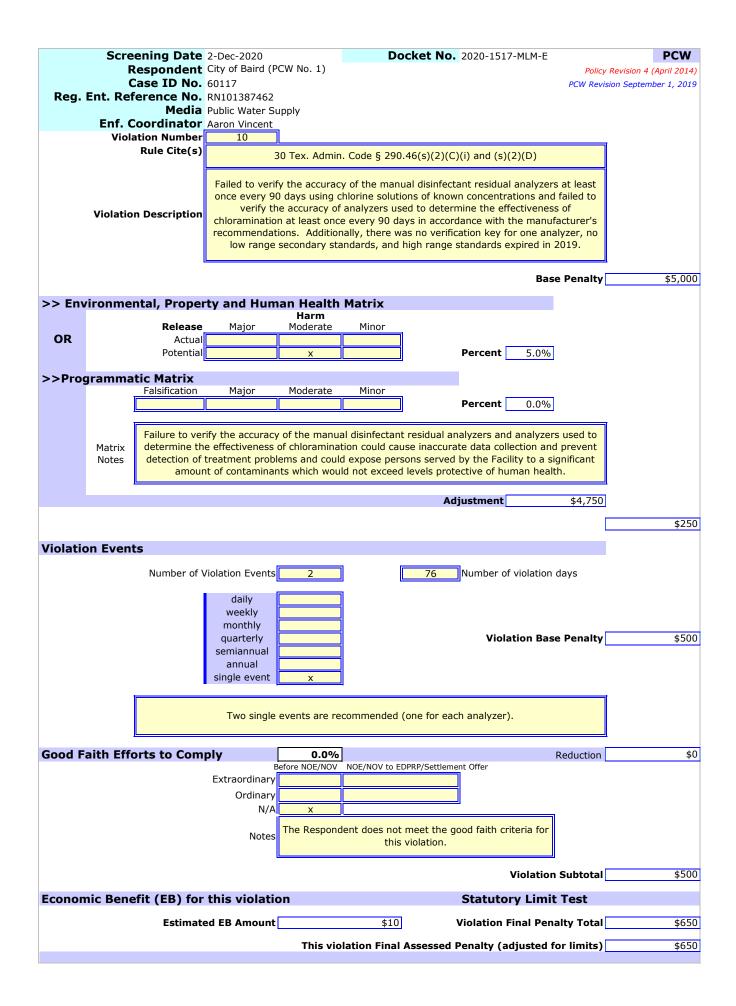
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.		,					
Reg. Ent. Reference No.							
Media Violation No.	Public Water S	supply				Percent Interest	Years of Depreciation
	,					5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Itom Description		Dute Required	That Dute		Intel est sureu		LD 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
itemediation, Disposal							
Permit Costs				0.00	\$0	n/a	\$0
· ·	\$10 The delayed o	17-Sep-2020	25-Jun-2022 estimated amou	0.00	\$0 \$1		\$0 \$1
Permit Costs	The delayed of	cost includes the e to check with at le	estimated amou east one buffer o	0.00 1.77 Int to ve	\$0 \$1 erify the accuracy of	n/a n/a of the pH meter at l oles is run, calculate	\$0 \$1 east once each
Permit Costs Other (as needed)	The delayed d day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to	0.00 1.77 Int to ve each tim the est	\$0 \$1 erify the accuracy of ne a series of samp imated date of cor	n/a n/a of the pH meter at l oles is run, calculate	\$0 \$1 east once each d from the
Permit Costs Other (as needed) Notes for DELAYED costs	The delayed d day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to	0.00 1.77 Int to ve each tim the est	\$0 \$1 erify the accuracy of ne a series of samp imated date of cor	n/a n/a of the pH meter at l oles is run, calculate npliance.	\$0 \$1 east once each d from the
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	The delayed d day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to	0.00 1.77 unt to ve each tim the est	\$0 \$1 erify the accuracy of ne a series of samp imated date of cor item (except for	n/a n/a of the pH meter at l oles is run, calculate npliance. r one-time avoide	\$0 \$1 east once each d from the d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed d day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to	0.00 1.77 Int to ve each tim the est ntering 0.00	\$0 \$1 erify the accuracy of the a series of samp imated date of cor item (except for \$0	n/a n/a of the pH meter at looles is run, calculate npliance. r one-time avoide \$0	\$0 \$1 east once each d from the d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed d day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to	0.00 1.77 ant to ve each tim the est tering 0.00 0.00	\$0 \$1 erify the accuracy of the a series of sample imated date of correct item (except for \$0 \$0	n/a n/a of the pH meter at le ples is run, calculate npliance. r one-time avoide \$0 \$0	\$0 \$1 east once each d from the d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	The delayed d day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to	0.00 1.77 Int to ve each tim the est tering 0.00 0.00 0.00	\$0 \$1 prify the accuracy of the a series of samplimated date of correct item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a of the pH meter at lo ples is run, calculate npliance. r one-time avoide \$0 \$0 \$0	\$0 \$1 east once each d from the d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	The delayed d day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to	0.00 1.77 Int to ve each tim the est tering 0.00 0.00 0.00 0.00	\$0 \$1 erify the accuracy of he a series of samplimated date of corr item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a of the pH meter at liples is run, calculate npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$1 east once each d from the d costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed of day and t	cost includes the e to check with at le inves	estimated amou east one buffer of tigation date to costs before en	0.00 1.77 1	\$0 \$1 prify the accuracy of the a series of samplimated date of correct item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a of the pH meter at loges is run, calculate npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 east once each d from the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed of day and the day	cost includes the e to check with at le inves ALIZE avoided c ALIZE avoided c Investigation Investigation Investigation Cost includes the e	estimated amou east one buffer of tigation date to costs before en 2-Dec-2020 estimated amou east one buffer of	0.00 1.77 Int to ve each tim the est 0.00 0.00 0.00 0.00 0.00 0.21 0.00 0.21 0.00	\$0 \$1 erify the accuracy of the a series of samplimated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a of the pH meter at looles is run, calculate npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 east once each d from the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



		conomic	Denent	AA OI	NSHEEL		
Respondent	City of Baird (I	PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
Media	Public Water S	upply				Percent Interest	Years of
Violation No.	8					Percent Interest	Depreciation
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
-							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$10	17-Sep-2020	12-Nov-2020	0.15	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Remediation/Disposal							
Permit Costs				0.00	\$0	n/a	\$0
· · ·			d cost includes t	1.77 he estir	\$1 nated amount to p igation date to the	n/a n/a purchase current pri e date the current st	\$1 mary (\$5) and
Permit Costs	The Training/ secondary st The Other (as with primary	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea	d cost includes t culated from th l cost includes t st once every 9	1.77 he estir e invest purcha he estin 0 days a	\$1 nated amount to p igation date to the ised. nated amount to c and check the calil om the investigati	n/a purchase current pri	\$1 mary (\$5) and andards were op turbidimeter ary standards
Permit Costs Other (as needed)	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estir purcha he estin 0 days ulated fr compli	\$1 nated amount to p igation date to the ised. nated amount to c and check the calil om the investigati ance.	n/a purchase current pri e date the current st alibrate the benchtco pration with seconda	\$1 mary (\$5) and andards were pp turbidimeter ary standards nated date of
Permit Costs Other (as needed) Notes for DELAYED costs	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estir purcha he estin 0 days ulated fr compli	\$1 nated amount to p igation date to the ised. nated amount to c and check the calil om the investigati ance.	n/a purchase current print a date the current st alibrate the benchto pration with seconda on date to the estin	\$1 mary (\$5) and andards were op turbidimeter ary standards nated date of
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estir purcha he estin 0 days ulated fr compli	\$1 nated amount to p igation date to the ised. nated amount to c and check the calil om the investigati ance. item (except for	n/a purchase current pri date the current st alibrate the benchto pration with seconda on date to the estin	\$1 mary (\$5) and andards were by turbidimeter ary standards nated date of d costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estir purcha he estin 0 days ulated fr compli tering 0.00	\$1 nated amount to p igation date to the ised. nated amount to c and check the calil om the investigati ance. item (except for \$0	n/a purchase current pri e date the current st alibrate the benchto pration with seconda on date to the estin one-time avoided \$0	\$1 mary (\$5) and andards were by turbidimeter ary standards nated date of d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estir e invest purcha he estin 0 days alated fr compli- tering 0.00	\$1 nated amount to p igation date to the sed. nated amount to c and check the calil om the investigati ance. item (except for \$0 \$0	n/a purchase current print a date the current st alibrate the benchto pration with seconda on date to the estin one-time avoide \$0 \$0	\$1 mary (\$5) and andards were by turbidimeter ary standards nated date of d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estir e invest purcha 0 days ulated fr compli- tering 0.00 0.00	\$1 nated amount to p igation date to the ased, nated amount to c and check the calil om the investigati ance. item (except for \$0 \$0 \$0	n/a purchase current print adate the current st alibrate the benchto pration with seconda on date to the estin one-time avoide \$0 \$0 \$0	\$1 mary (\$5) and andards were pp turbidimeter ary standards nated date of d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estin purcha he estin 0 days a ulated fr compli- tering 0.00 0.00 0.00	\$1 nated amount to p igation date to the sed. nated amount to c and check the calil om the investigati ance. item (except for \$0 \$0 \$0 \$0	n/a purchase current print a date the current st alibrate the benchto pration with seconda on date to the estin r one-time avoided \$0 \$0 \$0 \$0	\$1 mary (\$5) and andards were by turbidimeter ary standards nated date of d costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The Training/ secondary st The Other (as with primary each time a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples	d cost includes t culated from th d cost includes t st once every 9 s is tested, calcu	1.77 he estin purcha 0 days a alated fr compli- tering 0.00 0.00 0.00 0.00	\$1 nated amount to p igation date to the ised. nated amount to c and check the calil om the investigati ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a purchase current print a date the current st alibrate the benchto pration with seconda on date to the estin r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$1 mary (\$5) and andards were by turbidimeter ary standards nated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The Training/ secondary st The Other (as with primary each time a ANNU/ \$10 The avoide standards a	(Sampling delayed andards (\$5), cal s needed) delayed v standards at lea series of samples ALIZE avoided c LIZE avoided c LIZE avoided c LIZE avoided c LIZE avoided c	d cost includes t culated from the d cost includes t st once every 9 s is tested, calcu osts before er 2-Dec-2020 de estimated arr y 90 days and c	1.77 he estin purcha days : Jated fr compli- tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$1 nated amount to p igation date to the sed. nated amount to c and check the calil om the investigati ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 calibrate the bence calibration with s	n/a purchase current print adate the current st alibrate the benchto pration with seconda on date to the estim one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1 mary (\$5) and andards were by turbidimeter ary standards nated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.		PCW No. 1)					
Reg. Ent. Reference No. Media	RN101387462 Public Water S					Percent Interest	Years of
Violation No.	. 9						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
				0.00	\$0	n/a	\$0
Remediation/Disposal							
Remediation/Disposal Permit Costs Other (as needed)			estimated amou			n/a n/a line turbidimeters (: neck the calibration	
Permit Costs	The delayed c turbidimeter) standard, comparing t	ost includes the e with primary sta , secondary stand the results from th	estimated amour ndards at least o lard, or manufao he on-line unit v	1.77 nt to ca once ev cturer's vith the	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro	n/a	\$4 \$10 per on-line with a primary evice or by ichtop unit at
Permit Costs Other (as needed)	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 nt to ca once ev cturer's vith the investi	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the	n/a line turbidimeters (: neck the calibration tion confirmation de perly calibrated ben	\$4 \$10 per on-line with a primary evice or by uchtop unit at compliance.
Permit Costs Other (as needed) Notes for DELAYED costs	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 nt to ca once ev cturer's vith the investi	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the	n/a line turbidimeters (neck the calibration tion confirmation de perly calibrated ben estimated date of c one-time avoide \$0	\$4 \$10 per on-line with a primary evice or by icchtop unit at compliance. d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 nt to ca once ev cturer's vith the investi ntering 0.00 0.00	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the item (except for \$0 \$0	n/a line turbidimeters (neck the calibration tion confirmation de perly calibrated ben estimated date of c one-time avoider \$0 \$0	\$4 \$10 per on-line with a primary evice or by ichtop unit at compliance. d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 Int to ca ponce ev cturer's vith the investi ttering 0.00 0.00	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the item (except for \$0 \$0 \$0	n/a line turbidimeters (speck the calibration ition confirmation de perly calibrated ben estimated date of control one-time avoider \$0 \$0 \$0	\$4 \$10 per on-line with a primary evice or by chtop unit at compliance. \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 It to ca once ev cturer's with the investi 0.00 0.00 0.00 0.00	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the item (except for \$0 \$0 \$0 \$0 \$0	n/a line turbidimeters (: neck the calibration tion confirmation de perly calibrated ben estimated date of c simated dat	\$4 \$10 per on-line with a primary evice or by chtop unit at compliance. \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 It to ca once ev cturer's with the investi 10.00 0.00 0.00 0.00 0.00 0.00	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a line turbidimeters (: neck the calibration tion confirmation de perly calibrated ben estimated date of c one-time avoide \$0 \$0 \$0 \$0 \$0	\$4 \$10 per on-line with a primary evice or by inchtop unit at compliance. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 nt to ca price events vith the price investive ntering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a line turbidimeters (neck the calibration tion confirmation de perly calibrated ben estimated date of co one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4 \$10 per on-line with a primary evice or by inchtop unit at compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 It to ca once ev cturer's with the investi 10.00 0.00 0.00 0.00 0.00 0.00	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a line turbidimeters (: neck the calibration tion confirmation de perly calibrated ben estimated date of c one-time avoide \$0 \$0 \$0 \$0 \$0	\$4 \$10 per on-line with a primary evice or by inchtop unit at compliance. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed c turbidimeter) standard, comparing t least once	ost includes the e with primary stand secondary stand the results from the every week, cale	estimated amou ndards at least o lard, or manufao he on-line unit v culated from the	1.77 nt to ca price events vith the price investive ntering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$4 librate the five on- ery 90 days and cl proprietary calibra results from a pro gation date to the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a line turbidimeters (neck the calibration tion confirmation de perly calibrated ben estimated date of co one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$4 \$10 per on-line with a primary evice or by inchtop unit at compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent		PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
Media Violation No.	Public Water S 10	Supply				Percent Interest	Years of Depreciation
						5.0	. 1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	<u>\$0</u>
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	<u>\$0</u> \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Other (as needed)	\$5	17-Sep-2020	25-lun-2022	1.77	\$0	n/a	\$0
Other (as needed)	\$5	17-Sep-2020		1.77	\$0	n/a	<u>\$0</u>
	<i>'</i>				from the investiga	once every 90 days ation date to the est	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	terina	item (except for	one-time avoide	d costs)
Disposal		1		0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
nspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	
Financial Assurance				0.00	\$0	\$0	\$0
Other (as needed)	\$5	17-Sep-2020	2-Dec-2020	0.21	\$0		\$0
				0.21		\$5	
Other (as needed)	\$5	17-Sep-2020	2-Dec-2020	0.21	\$0 \$0	\$5 \$5	\$0 \$0
Other (as needed) Notes for AVOIDED costs	The first O manual di The secon analyzers use	ther (as needed) sinfectant residua concentrations, d Other (as neede d to determine th	2-Dec-2020 avoided cost inc I analyzer at lea calculated from ed) avoided cost e effectiveness	0.21 Iudes the st once the inv include of chlor	\$0 he estimated amou e every 90 days us estigation date to es the estimated a ramination at least		\$0 \$0 \$5 \$5 uracy of the is of known accuracy of in accordance

		ening Date		Docket No. 2020-1517-MLM-E	PCW
		lespondent Case ID No.	City of Baird (PCW No. 1)		Policy Revision 4 (April 2014) Revision September 1, 2019
Reg.			RN101387462		
			Public Water Supply		
		oordinator	Aaron Vincent		
	VIOI	Rule Cite(s)			
			30 Tex	. Admin. Code § 290.46(s)(2)(C)(ii)	
	Violatio	n Description	once every seven days	y of the Facility's continuous disinfectant analyzer at h with a chlorine solution of known concentration or by from the on-line analyzer with the result of approved benchtop method.	east
				Base Pen	alty \$5,000
>> Env	vironme	ntal, Propei	rty and Human Health	n Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual			
		Potential	X	Percent 5.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major Moderate	Minor Percent 0.0%	
				Percent 0.0%	
	Matrix Notes	inaccurate da	ta collection and prevent de the Facility to a significant ar	ontinuous disinfectant residual analyzers could cause tection of treatment problems and could expose perso mount of contaminants which would not exceed levels tive of human health.	
				Adjustment \$4,	750
					\$250
Violati	on Event				
Violati					
		Number of \	/iolation Events 1	Number of violation days	
			daily weekly monthly quarterly semiannual annual single event x	Violation Base Pen	alty \$250
			One single	e event is recommended.	
Good F	aith Effo	orts to Com			tion \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A x		
			Notes The Respon	dent does not meet the good faith criteria for this violation.	
				Violation Subt	stal \$250
Econor	nic Bene	efit (EB) for	this violation	Statutory Limit Test	:
		Estimate	ed EB Amount	\$5 Violation Final Penalty T	stal \$325
			<u> </u>	olation Final Assessed Penalty (adjusted for lim	
				oration rinal Assessed reliaity (aujusted for lim	3325 p

Violation No. 11 Percent interest perceia Deprecia Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amo Item Description Delayed Costs Equipment 0.00 \$0 <t< th=""><th></th><th>E</th><th>conomic</th><th>Benefit</th><th>Wo</th><th>rksheet</th><th></th><th></th></t<>		E	conomic	Benefit	Wo	rksheet		
Media Public Water Supply Violation No. 11 Percent Interest Deprecia 5.0 Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amo Delayed Costs Equipment Building Other (as needed) 0.00 \$0	Case ID No.	60117	-					
Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amo Item Description Delayed Costs Eaglement 0.00 \$0	Media	Public Water S					Percent Interest	Years of Depreciation
Item Description Buildings Statistics Buildings Softer (as needed) Inspection/Reports Deter (as needed) Inspection/Reports Notes for AVOIDED costs Deter (as needed) Disposal Personnel Personnel Disposal Personnel Personnel Disposal Personnel Supplies/Equipment Financial Assurance on Net ras needed) Disposal Personnel Disposal Personnel Supplies/Equipment Financial Assurance on Net ras needed) Disposal Personnel Disposal Personnel Supplies/Equipment Financial Assurance on Net ras needed) Disposal Personnel Disposal Personnel Personnel Disposal Personnel Disposal Personnel Disposal Personnel Disposal Personnel							5.0	. 15
Delayed Costs Equipment Buildings Other (as needed) 0.00 \$0 \$0 \$0 \$0 Engineering/Construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs 0.00 \$0 n/a \$0 Motes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs Disposal Personnel \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Supplies/Equipment Financial Assurance ONE-TIME avoided costs ANUALIZE avoided costs before entering item (except for one-time avoided costs) \$0		Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Equipment Buildings 0.00 \$0 \$0 \$0 \$0 Other (as needed) 0.00 \$0 \$0 \$0 \$0 \$0 Engineering/Construction Land 0.00 \$0 \$0 \$0 \$0 \$0 \$0 Record Keeping System Training/Sampling Remediation/Disposal 0.00 \$0 n/a \$0	Item Description							
Equipment Buildings Other (as needed) 0.00 \$0 \$0 \$0 \$0 Engineering/Construction Land 0.00 \$0 \$0 \$0 \$0 \$0 Record Keeping System Training/Sampling 0.00 \$0 n/a \$0 \$0 \$0 \$0 Remediation/Disposal Permit Costs 0.00 \$0 n/a \$0 \$0 n/a \$0 Notes for DELAYED costs 55 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs Disposal Personnel 0.00 \$0 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>								
Buildings Other (as needed) 0.00 \$0 \$0 \$0 \$0 Engineering/Construction Land 0.00 \$0 \$0 \$0 \$0 Record Keeping System Training/Sampling Remediation/Disposal 0.00 \$0 n/a \$0 Permit Costs 0.00 \$0 n/a \$0 Other (as needed) \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) \$0 Statistic for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or I comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the estimated date of compliance. Notes for AVOIDED costs The avoided costs includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or I comparing the results from the on-line analyzer with the result of approved bencht	-		1		7			
Other (as needed) Engineering/Construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Notes for AVOIDED costs Notes for AVOIDED costs								
Engineering/Construction Land 0.00 \$0 \$0 \$0 \$0 Record Keeping System Training/Sampling Remediation/Disposal Dermit Costs 0.00 \$0 n/a \$0 Record Keeping System Training/Sampling Remediation/Disposal Dermit Costs 0.00 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs The delayed cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the estimated date of compliance. Avoided Costs ONE-TIME avoided costs Other (as needed) \$0 \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or long supplies/Equipment Financial Assurance \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or comparing the results from the on-line analyzer with the result of approved								
Land Record Keeping System Training/Sampling 0.00 \$0 n/a \$0 Training/Sampling Remediation/Disposal Permit Costs 0.00 \$0 n/a \$0 Other (as needed) \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Disposal Personnel \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for AVOIDED costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) \$0								
Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed) 0.00 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs The delayed cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the estimated date of compliance. Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) Personnel 0.00 \$0 \$0 \$0 Supplies/Equipment 0.00 \$0 \$0 \$0 \$0 Financial Assurance \$5 17-Sep-2020 2-Dec-2020 0.21 \$0 \$0 ONE -TIME avoided costs \$5 17-Sep-2020 0.21 \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chl								
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) 0.00 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs The delayed cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the estimated date of compliance. Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) Personnel 0.00 \$0 \$0 Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance 0.00 \$0 \$0 \$0 Notes for AVOIDED costs \$5 17-Sep-2020 2-Dec-2020 0.21 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.								
Remediation/Disposal Permit Costs Other (as needed) 0.00 \$0 n/a \$0 Notes for DELAYED costs \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs The delayed cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or loomparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the estimated date of compliance. Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) Disposal Personnel 0.00 \$0 \$0 \$0 Supplies/Equipment Financial Assurance ONE-TIME avoided costs 0.00 \$0 \$0 \$0 Start (as needed) \$5 17-Sep-2020 2-Dec-2020 0.21 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.		-						
Permit Costs Other (as needed) image: costs image: co								
Other (as needed) \$5 17-Sep-2020 25-Jun-2022 1.77 \$0 n/a \$0 Notes for DELAYED costs The delayed cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or lomparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the estimated date of compliance. Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) Disposal 0.00 \$0 \$0 \$0 Personnel 0.00 \$0 \$0 \$0 \$0 \$0 Supplies/Equipment Financial Assurance 0.00 \$0	· · · · · · · · · · · · · · · · · · ·	-						
Notes for DELAYED costs The delayed cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the estimated date of compliance. Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs) Disposal Personnel 0.00 \$0 \$0 \$0 Supplies/Equipment 0.00 \$0 \$0 \$0 \$0 \$0 Financial Assurance 0.00 \$0 <td></td> <td><u>+ ۲</u></td> <td>17 Car 2020</td> <td>25 1.00 2022</td> <td></td> <td></td> <td></td> <td></td>		<u>+ ۲</u>	17 Car 2020	25 1.00 2022				
Disposal Personnel 0.00 \$0 \$0 \$0 Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) 0.00 \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.	Notes for DELAYED costs		ne results from the	e on-line analyz	er with	the result of appro	oved benchtop meth	
Personnel 0.00 \$0 \$0 \$0 Inspection/Reporting/Sampling Supplies/Equipment 0.00 \$0 \$0 \$0 Financial Assurance 0.00 \$0 \$0 \$0 \$0 \$0 ONE-TIME avoided costs 0ther (as needed) \$5 17-Sep-2020 2-Dec-2020 0.00 \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or I comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.	Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	item (except for	r one-time avoide	d costs)
Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) 0.00 \$0 \$0 \$0 Notes for AVOIDED costs Notes for AVOIDED costs The avoided cost from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.	Disposal				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) 0.00 \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcular from the investigation date to the screening date.	Personnel				0.00	\$0	\$0	\$0
Financial Assurance ONE-TIME avoided costs Other (as needed) Notes for AVOIDED costs Image: Notes for	Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
ONE-TIME avoided costs Other (as needed) \$5 17-Sep-2020 2-Dec-2020 0.21 \$0 \$5 \$5 Notes for AVOIDED costs \$5 17-Sep-2020 2-Dec-2020 0.21 \$0 \$0 \$0 \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or long analyzer with the result of approved benchtop method, calcular from the investigation date to the screening date.	Supplies/Equipment							
Other (as needed) 0.00 \$0 \$0 \$0 Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.	Financial Assurance				0.00			
Notes for AVOIDED costs The avoided cost includes the estimated amount to verify the accuracy of the continuous disinfectar residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.	ONE-TIME avoided costs	\$5	17-Sep-2020	2-Dec-2020	0.21		\$5	
Notes for AVOIDED costs residual analyzer at least once every seven days with a chlorine solution of known concentration or l comparing the results from the on-line analyzer with the result of approved benchtop method, calcula from the investigation date to the screening date.	Other (as needed)				0.00	\$0	\$0	\$0
	Notes for AVOIDED costs	residual and	alyzer at least one ne results from the	ce every seven e on-line analyz	days wit er with	th a chlorine soluti the result of appro	on of known concer oved benchtop meth	tration or by
Approx. Cost of Compliance \$10 TOTAL								

		ening Date		Docket No. 2020-1517-MLM-E	PCW
			City of Baird (PCW No. 1)		Policy Revision 4 (April 2014)
Deg		Case ID No. Ference No.		PC	W Revision September 1, 2019
Reg.	LIIL KEI		Public Water Supply		
	Enf. C	Coordinator			
	Viola	ation Number	12		
		Rule Cite(s)	30 Tex	Admin. Code § 290.42(d)(2)(A)	
	Violatio	n Description		breakers on each hose bibb within the plant facilit at the water treatment plant were not equipped w vacuum breaker.	
				Base Pe	nalty \$5,000
>> Env	vironme	ntal, Proper	ty and Human Health	Matrix	
			Harm		
OR		Release Actual	Major Moderate	Minor	
UK		Potential	X	Percent 5.0%	
>>Pro	gramma	tic Matrix	Maiau Madauata	Minor	
		Falsification	Major Moderate	Minor Percent 0.0%	
	Matrix	Failure to prov	vide a vacuum breaker on eac	ch hose bibb could allow the water supply to be exp	osed
	Notes			ich would not exceed levels protective of human he	
				Adjustment \$	4,750
					\$250
					φ230
Violatio	on Event	ts			
		Number of \	/iolation Events 2	76 Number of violation days	
			daily		
			weekly monthly		
			quarterly x	Violation Base Pe	nalty \$500
			semiannual		
			annual		
			single event		
		Two quarterly	ovents are recommended (or	ne event for each vacuum breaker), calculated fror	n the
				date to the December 2, 2020 screening date.	
Good F	aith Effo	orts to Com		Redu	stion \$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A x		
				lent does not meet the good faith criteria for	
			Notes	this violation.	
				Violation Sub	stotal \$500
Econor	nic Bene	efit (EB) for	this violation	Statutory Limit Te	st
		Estimate	ed EB Amount	\$7 Violation Final Penalty	Total \$650
			This via	lation Final Assessed Penalty (adjusted for li	mits) \$650
				auton i mui Assesseu renaity (aujusteu 101 m	

	E	conomic	Benefit	Wo	r ksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60117						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment	\$60	17-Sep-2020	25-Jun-2022	1.77	\$0	\$7	\$7
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
				0.00	Ψ0	Π/a	4 0
Other (as needed)	The delayer		estimated amo	0.00	\$0	n/a	\$0
Notes for DELAYED costs	bibbs at t	he water treatme	nt plant, calcula	0.00 ount to ited from compli	\$0 provide a vacuum m the investigatior ance.	n/a breaker for each of date to the estima	\$0 the two hose ted date of
Notes for DELAYED costs	bibbs at t	he water treatme	nt plant, calcula	0.00 ount to ited from compli	\$0 provide a vacuum m the investigatior ance. item (except for	n/a breaker for each of a date to the estima	\$0 the two hose ted date of d costs)
Notes for DELAYED costs Avoided Costs Disposal	bibbs at t	he water treatme	nt plant, calcula	0.00 ount to ted from compli tering 0.00	\$0 provide a vacuum n the investigatior ance. item (except for \$0	n/a breaker for each of a date to the estima one-time avoide \$0	\$0 the two hose ted date of d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	bibbs at t	he water treatme	nt plant, calcula	0.00 ount to ted from compli tering 0.00 0.00	\$0 provide a vacuum n the investigatior ance. item (except for \$0 \$0	n/a breaker for each of a date to the estima one-time avoide \$0 \$0	\$0 the two hose ted date of d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	bibbs at t	he water treatme	nt plant, calcula	0.00 ount to compli tering 0.00 0.00 0.00	\$0 provide a vacuum m the investigation ance. item (except for \$0 \$0 \$0	n/a breaker for each of date to the estima one-time avoide \$0 \$0 \$0	\$0 the two hose ted date of d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	bibbs at t	he water treatme	nt plant, calcula	0.00 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	\$0 provide a vacuum m the investigation ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a breaker for each of date to the estima cone-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 the two hose ted date of d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	bibbs at t	he water treatme	nt plant, calcula	0.00 ount to compli tering 0.00 0.00 0.00 0.00 0.00	\$0 provide a vacuum m the investigation ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a breaker for each of date to the estima one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 the two hose ted date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	bibbs at t	he water treatme	nt plant, calcula	0.00 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	\$0 provide a vacuum m the investigation ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a breaker for each of date to the estima one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 the two hose ted date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	bibbs at t	he water treatme	nt plant, calcula	0.00 ount to compli tering 0.00 0.00 0.00 0.00 0.00	\$0 provide a vacuum m the investigation ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a breaker for each of date to the estima one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 the two hose ted date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	bibbs at t	he water treatme	nt plant, calcula	0.00 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	\$0 provide a vacuum m the investigation ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a breaker for each of date to the estima one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 the two hose ted date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

			City of Baird (PCW No. 1)		Policy Revision 4 (April 2014)
Peg		Case ID No. Ference No.			PCW Revision September 1, 2019
Reg.	LIIL KEI		Public Water Supply		
		Coordinator	Aaron Vincent		
	Viola	ation Number	13		
		Rule Cite(s)	30 T	ex. Admin. Code § 290.43(c)(2)	
	Violatio	n Description	inspections and maintena	cility's clearwell roof hatch remains locked excence. Specifically, the roof hatch for the clearwe reatment plant did not have a lock.	
				Base	e 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 5.0%	
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor	
		Faisincation	Major Moderate	Percent 0.0%	
	Matrix			ked could allow unauthorized access to the clea	
	Notes	could result in		y being exposed to a significant amount of con d levels protective of human health.	itaminants
				Adjustment	\$4,750
					\$250
					\$250
Violati	ion Event	ts			\$250
Violati	ion Event		/iolation Events	76 Number of violation	
Violati	ion Event		daily weekly monthly		days
Violati	on Event		daily weekly	76 Number of violation Violation Base	days
Violati	on Event	Number of \	daily weekly monthly quarterly x semiannual annual single event v event is recommended, calc		days e Penalty \$250
		Number of \	daily weekly monthly quarterly x semiannual annual single event v event is recommended, calcon to the Decemle ply 0.0%	Violation Base violated from the September 17, 2020 investiga per 2, 2020 screening date.	days e Penalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event v event is recommended, calc to the Deceml ply 0.0% Before NOE/NOV	Violation Base violated from the September 17, 2020 investiga per 2, 2020 screening date.	days e Penalty \$250
		Number of N	daily weekly monthly y y x semiannual annual single event is recommended, calc to the Deceml	Violation Base violated from the September 17, 2020 investiga per 2, 2020 screening date.	days e Penalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event v event is recommended, calc to the Deceml ply 0.0% Before NOE/NOV	Violation Base violated from the September 17, 2020 investiga per 2, 2020 screening date.	days e Penalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event v event is recommended, calc to the Deceml ply 0.0% Before NOE/NOV Extraordinary Ordinary N/A x	Violation Base violated from the September 17, 2020 investiga per 2, 2020 screening date.	days e Penalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event v event is recommended, calc to the Decemb ply 0.0% Before NOE/NOV Extraordinary Ordinary N/A x The Respondent	Violation Base culated from the September 17, 2020 investiga per 2, 2020 screening date. NOE/NOV to EDPRP/Settlement Offer	days e Penalty \$250
Good F	Faith Effo	Number of N One quarterly	daily weekly monthly quarterly x semiannual annual single event vevent is recommended, calce to the December Ply 0.0% Before NOE/NOV Extraordinary Ordinary Ordinary N/A x Notes The Respondent	Violation Base vulated from the September 17, 2020 investiga ber 2, 2020 screening date. NOE/NOV to EDPRP/Settlement Offer	days e Penalty \$250 stion date Reduction \$0 Subtotal \$250
Good F	Faith Effo	Number of N One quarterly orts to Com	daily weekly monthly quarterly x semiannual annual single event control to the December of the	Violation Base ulated from the September 17, 2020 investigation per 2, 2020 screening date. NOE/NOV to EDPRP/Settlement Offer dent does not meet the good faith criteria for this violation. Violation	days e Penalty \$250 stion date Reduction \$0 Subtotal \$250 Test
Good F	Faith Effo	Number of N One quarterly orts to Com	daily weekly monthly quarterly x semiannual annual single event vevent is recommended, calce to the December Ply 0.0% Before NOE/NOV Extraordinary Ordinary Ordinary N/A x Notes The Respondent	Violation Base vulated from the September 17, 2020 investiga ber 2, 2020 screening date. NOE/NOV to EDPRP/Settlement Offer	days e Penalty \$250 stion date Reduction \$0 Subtotal \$250 Test

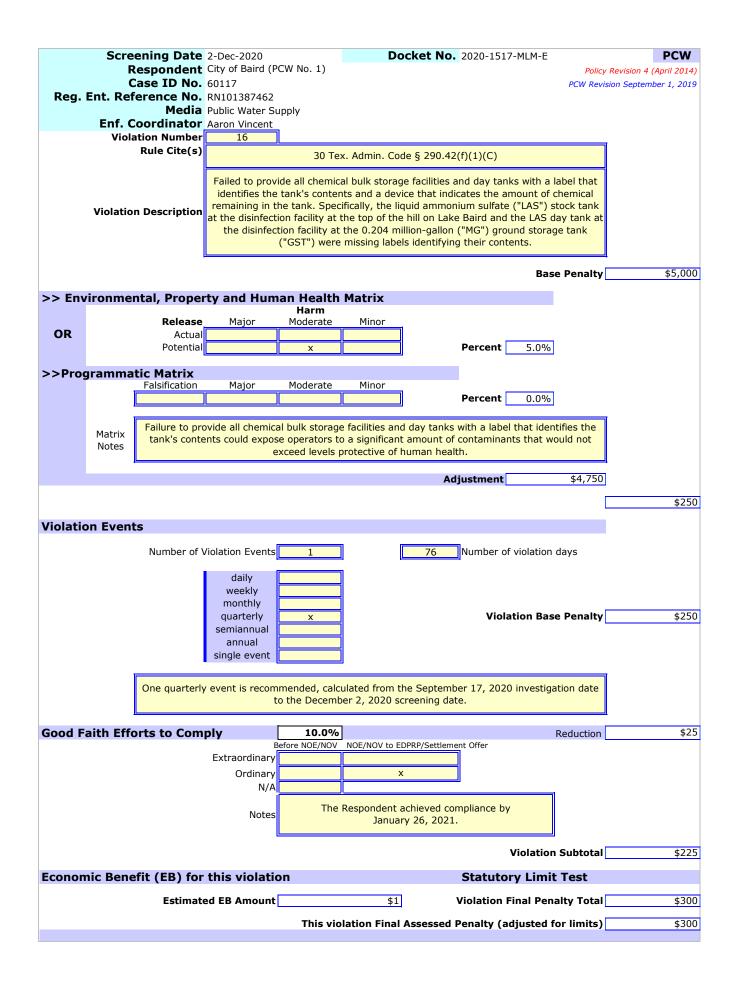
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.		,					
Reg. Ent. Reference No.							
							Years of
	Public Water S	ирріу				Percent Interest	
Violation No.	13						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB 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)	\$50	17-Sep-2020	25-Jul-2022	1.85	\$5	n/a	\$5
Notes for DELAYED costs		from the i	nvestigation dat	te to the	e estimated date o		
Avoided Costs	ANNU	ALIZE avoided c	osts before er		<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
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$50			TOTAL		\$5

		ening Date	2-Dec-2020 City of Baird (PCW No. 1)	Doe	cket No. 2020-1517-MLM-E	Policy	PCW Revision 4 (April 2014)
	C	Case ID No.	60117				sion September 1, 2019
Reg.	Ent. Ref		RN101387462				
	Enf. C	Media Coordinator	Public Water Supply Aaron Vincent				
		ation Number					
		Rule Cite(s)	3	0 Tex. Admin. Co	de § 290.43(c)(3)		
	Violatio	n Description	American Water Works A terminates downward witl gap over 1/16 inch. Spe ground and prevented th	Association ("AWW h a gravity-hinged cifically, the over e cover from clos	tanks in strict accordance with or /A") standards with an overflow d and weighted cover tightly fitte flow pipe for Tank No. 2 was flus ing properly. Additionally, the cle d not have an overflow pipe.	pipe that ed with no sh to the	
					Base	e Penalty	\$5,000
>> Env	vironme	ntal, Propei	rty and Human Heal	th Matrix			
		Release	Harm Major Moderat	e Minor			
OR		Actual			Barrant 5 and		
		Potential	X		Percent 5.0%		
>>Pro	gramma	tic Matrix					
		Falsification	Major Moderat	e Minor	Percent 0.0%		
							r
	Matrix Notes		amount of contaminants t		with a tightly fitting cover could supply which would not exceed realth.		
					Adjustment	\$4,750	
						1	\$250
	_	-					+
Violati	on Even	ts					
		Number of V	Violation Events 1		76 Number of violation of	days	
			daily				
			weekly				
			monthly		Vislation Deer	Demala	+250
			quarterly <u>x</u> semiannual		Violation Base	Penalty	\$250
			annual				
			single event				
		One quarterly		alculated from th mber 2, 2020 scr	e September 17, 2020 investiga reening date.	tion date	
Good F	Faith Eff	orts to Com	ply 0.0	%		Reduction	\$0
			Before NOE/N		PRP/Settlement Offer		
			Extraordinary Ordinary				
			N/A x				
			Notes The Resp		meet the good faith criteria for violation.		
					Violation	Subtotal	\$250
Econor	mic Bene	efit (EB) for	this violation		Statutory Limit	Test	
		Estimate	ed EB Amount	\$78	Violation Final Pena	alty Total	\$325
			This	violation Final A	Assessed Penalty (adjusted for	or limits)	\$325

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60117						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
Item Description		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	Г			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$600	17-Sep-2020	25-Jul-2022	1.85	\$4	\$74	\$78
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/n	\$0
r crimit costs				0.00	ب 0	n/a	\$U
Other (as needed)				0.00 nt to pro	\$0 ovide an overflow	n/a pipe with a weighted	\$0 d cover that fits
Other (as needed) Notes for DELAYED costs	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp	\$0 ovide an overflow h AWWA standard red from the inves liance.	n/a pipe with a weighted s for Tank No. 2 (\$ tigation date to the	\$0 d cover that fits 100) and the estimated date
Other (as needed) Notes for DELAYED costs Avoided Costs	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp	\$0 ovide an overflow th AWWA standard ted from the inves liance. item (except for	n/a pipe with a weighted is for Tank No. 2 (\$ tigation date to the one-time avoide	\$0 d cover that fits 100) and the estimated date d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp ntering 0.00	\$0 ovide an overflow th AWWA standard ted from the inves liance. item (except for \$0	n/a pipe with a weighted s for Tank No. 2 (\$ tigation date to the r one-time avoide \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp ntering 0.00	\$0 by ide an overflow p th AWWA standard ted from the inves liance. item (except for \$0 \$0	n/a pipe with a weighted s for Tank No. 2 (\$ tigation date to the cone-time avoide \$0 \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	nt to pro ance wit calculat of comp ntering 0.00 0.00	\$0 by ide an overflow in the AWWA standard red from the investigation item (except for \$0 \$0 \$0 \$0	n/a pipe with a weighted s for Tank No. 2 (\$) tigation date to the r one-time avoide \$0 \$0 \$0 \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	nt to pro ance wit calculat of comp ntering 0.00 0.00 0.00	\$0 by ide an overflow th AWWA standard red from the inves liance. item (except for \$0 \$0 \$0 \$0 \$0	n/a pipe with a weighted s for Tank No. 2 (\$ tigation date to the one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 by ide an overflow th AWWA standard red from the inves liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a pipe with a weighted s for Tank No. 2 (\$) tigation date to the one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 pyide an overflow j th AWWA standard ted from the invest liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a pipe with a weighted s for Tank No. 2 (\$ tigation date to the one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 by ide an overflow th AWWA standard red from the inves liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a pipe with a weighted s for Tank No. 2 (\$) tigation date to the one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	tightly with clearwell at th	no gap over 1/16 ne water treatmer	5 inch in accord nt plant (\$500),	0.00 nt to pro ance wit calculat of comp tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 pyide an overflow j th AWWA standard ted from the invest liance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a pipe with a weighted s for Tank No. 2 (\$ tigation date to the one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 d cover that fits 100) and the estimated date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Scre	ening Date	2-Dec-2020	Docket No. 2020-1517-MLM	-E	PCW
			City of Baird (PCW No. 1)			Revision 4 (April 2014)
Peg		Case ID No. Ference No.			PCW Revisi	on September 1, 2019
Reg.	. Liit. Kei		Public Water Supply			
	Enf. C	Coordinator				
	Viola	ation Number	15			
		Rule Cite(s)	30 T	ex. Admin. Code § 290.41(e)(5)		
	Violatio	n Description	lockable building that is d intruder-resistant fence with	er pump station and all appurtenances are esigned to prevent intruder access or encl lockable gates. Specifically, the raw water oken windows that allowed intruder access	osed by an pump station	
					Base Penalty	\$5,000
>> En	vironme	ntal, Proper	ty and Human Health	Matrix		
			Harm			
OR		Release Actual	Major Moderate	Minor		
		Potential	x	Percent 5.0	0%	
>>Pro	ogramma	tic Matrix Falsification	Major Moderate	Minor		
					0%	
	Matrix Notes		o a significant amount of con	aw water pump station could expose perso taminants which would not exceed levels p ruman health.		
				Adjustment	\$4,750	
					<i><i><i></i></i></i>	+250
					L	\$250
Violati	ion Event	ts				
		Number of \	/iolation Events 1	76 Number of violat	ion days	
		Number of V			lion days	
			daily			
			weekly			
			monthly quarterly x	Violation I	Base Penalty	\$250
			semiannual			
			annual			
		l	single event	l .		
		One quarterly	-	ulated from the September 17, 2020 investor 2, 2020 screening date.	stigation date	
Good	Faith Eff	orts to Com	ply 0.0%		Reduction	\$0
Good I			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Reduction	40
			Extraordinary			
			Ordinary			
			N/Al <u>x</u>	I		
			Notes The Respond	lent does not meet the good faith criteria f this violation.	for	
				Violat	tion Subtotal	\$250
Econo	mic Bene	efit (EB) for	this violation	Statutory Li	mit Test	
		Estimate	ed EB Amount	\$62 Violation Final F	Penalty Total	\$325
			This via	lation Final Assessed Penalty (adjuste	- d for limite)	\$325
				nation rinal Assessed Penalty (adjuste	su for mills)	\$JZJ

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.		/					
Reg. Ent. Reference No.							
	Public Water S						Years of
		uppiy				Percent Interest	Depreciation
Violation No.	15						•
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$500	17-Sep-2020	25-Jun-2022	1.77	\$3	\$59	\$62
Engineering/Construction	\$300	17 300 2020	25 Jun 2022	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	station	n building, calcula	ted from the inv	vestigat	ion date to the est	windows at the raw imated date of com	pliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before er		<u> </u>	r one-time avoided	-
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	<u>\$0</u> \$0	\$0 \$0	<u>\$0</u> \$0
Supplies/Equipment Financial Assurance		1		0.00	\$0	\$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
other (as needed)				0.00	<u>\$0</u>	D	3 0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$500			TOTAL		\$62



	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.	60117						
leg. Ent. Reference No.	RN101387462)					
	Public Water S					Percent Interest	Years of Depreciation
						5.0	. 15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Them. Description		Date Required	i mai Date	113	Interest Saveu	COSIS Saveu	LD 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
				0.00	\$0	n/a	\$0
Remediation/Disposal	\$40	17-Sep-2020	26-Jan-2021	0.00 0.36	\$0 \$1	n/a n/a	\$0 \$1
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 Int to la	\$0 \$1 bel each tank (\$20 e to the complianc	n/a n/a) per tank x two tan e date.	\$0 \$1 ks), calculated
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 Int to la ion date	\$0 \$1 bel each tank (\$20 e to the complianc item (except for	n/a n/a) per tank x two tan e date. one-time avoide	\$0 \$1 ks), calculated d costs)
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the complianc item (except for \$0	n/a n/a) per tank x two tan e date. r one-time avoide \$0	<u>\$0</u> <u>\$1</u> ks), calculated d costs) <u></u> \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 item (except for \$0 \$0	n/a n/a) per tank x two tan e date. r one-time avoider \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the compliance item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a) per tank x two tan e date. r one-time avoider \$0 \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a) per tank x two tan e date. • one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a) per tank x two tan e date. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a) per tank x two tan e date. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a) per tank x two tan e date. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a) per tank x two tan e date. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed	cost includes the of from	estimated amou n the investigat	0.00 0.36 0.36 0.00 0.00 0.00 0.00 0.00	\$0 \$1 bel each tank (\$20 e to the compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a) per tank x two tan e date. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 ks), calculated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2020-1517-MLM-E	PCW
			City of Baird (PCW No. 1)		Policy Revision 4 (April 2014)
Dog		Case ID No.			PCW Revision September 1, 2019
Reg.	Ent. Rei	erence No. Media	Public Water Supply		
	Enf. C	coordinator	,		
	Viola	ation Number	17		
		Rule Cite(s)	30 Te	x. Admin. Code § 290.42(f)(1)(E)	
	Violatio	n Description	minimize the possibility of disinfection facility at the	oulk storage facilities and day tanks that are design f leaks and spills. Specifically, the LAS day tank a 0.204 MG GST had an opening that allowed entr and did not minimize the possibility of an accident	t the ry of
				Base F	Penalty \$5,000
>> Env	vironme	ntal, Proper	ty and Human Health	Matrix	
			Harm		
OR		Release Actual	Major Moderate	Minor	
UK		Potential	X	Percent 5.0%	
>>Pro	gramma	tic Matrix Falsification	Major Madarata	Minor	
		Faisification	Major Moderate	Percent 0.0%	
	Matrix Notes		leaks and spills could expose	cilities and day tanks that are designed to minim operators to a significant amount of contaminant evels protective of human health.	
				Adjustment	\$4,750
					\$250
					4230
Violati	on Event	ts			
		Number of \	/iolation Events 1	76 Number of violation da	vs
			daily weekly monthly		
			quarterly x semiannual	Violation Base F	Penalty \$250
		One quarterly	-	culated from the September 17, 2020 investigation of the september 2, 2020 screening date.	n date
Good F	Faith Effo	orts to Com	ply 0.0%	Re	duction \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary N/A x		
				dent does not meet the good faith criteria for this violation.	
				Violation S	ubtotal \$250
Econor	mic Bene	efit (EB) for	this violation	Statutory Limit T	est
		Estimate	ed EB Amount	\$0 Violation Final Penalt	y Total \$325
			This via	plation Final Assessed Penalty (adjusted for	limits) \$325
				nation rinal Assessed renalty (adjusted for	\$325 ¥

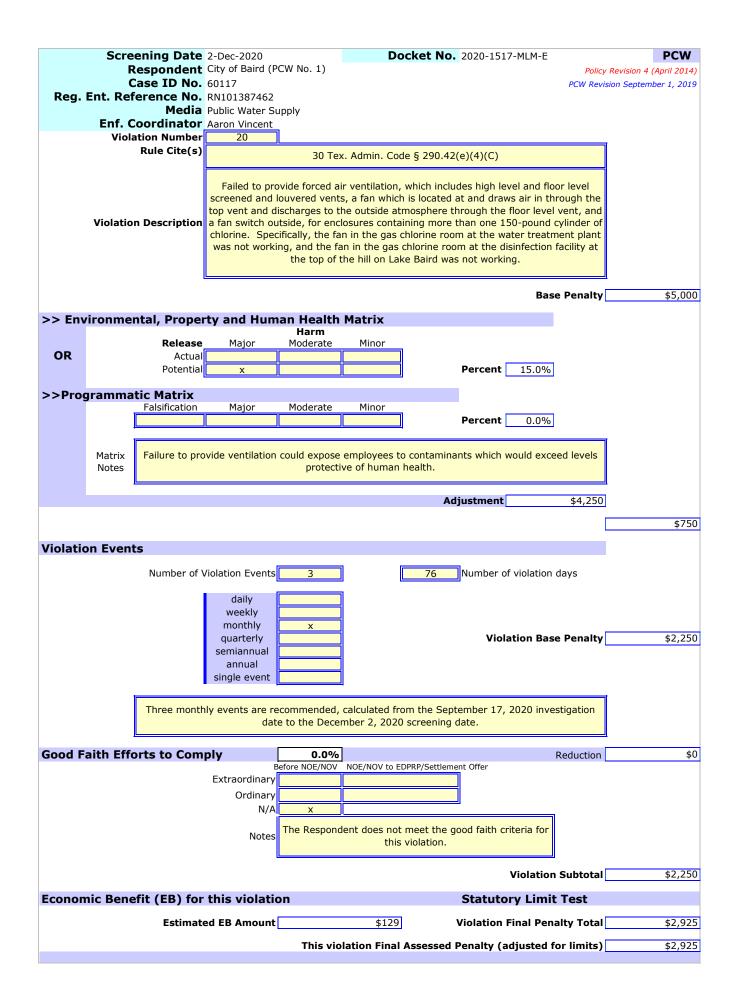
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
	Public Water S						Years of
Violation No.		, apply				Percent Interest	Depreciation
Violation No.	. 17					E o	
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	•						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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				No.	19.	nic Benefit Workshe	
Notes for DELAYED costs Avoided Costs				No.	19. item (except for	one-time avoide	d costs)
Avoided Costs Disposal				No. tering	19. item (except for \$0	r one-time avoide \$0	d costs) \$0
Avoided Costs Disposal Personnel				No. tering 0.00 0.00	19. item (except for \$0 \$0	r one-time avoide \$0 \$0	d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling				No. tering 0.00 0.00 0.00	19. item (except for \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0	d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment				No. 1 tering 0.00 0.00 0.00 0.00	19. item (except for \$0 \$0 \$0 \$0 \$0	r one-time avoided \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				No. tering 0.00 0.00 0.00 0.00 0.00	19. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				No. 2 1000 0.00 0.00 0.00 0.00 0.00 0.00	19. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				No. tering 0.00 0.00 0.00 0.00 0.00	19. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				No. 2 1000 0.00 0.00 0.00 0.00 0.00 0.00	19. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Docke	et No. 2020-1517-MLM-E		PCW
			City of Baird (P	PCW No. 1)				Revision 4 (April 2014)
Rea		Case ID No.	60117 RN101387462				PCW Revis	ion September 1, 2019
neg.	Line, Kei		Public Water St	upply				
	Enf. C	Coordinator		· · · · ·				
	Viola	ation Number	18				1	
		Rule Cite(s)		30 -	Tex. Admin. Code	§ 290.46(m)		
	Violatio	n Description	working condii Specifically, pump station plant, the cher mouse an housekeep disinfection fac	tion and gener the raw wate building was in nical injection d mouse drop ning, and the L cility at the top pment, includi	al appearance of r pumps were coun n need of general vaults contained pings were in the AS tank storage r of the hill on Lak ng unused chemi	eping practices to ensure the the system's facilities and en- rered in cobwebs and the ray maintenance. At the water is standing water. At Tank No. disinfection facility and it ne room needed housekeeping. the Baird, overgrowth of veget cal tanks, were noted. At the with of vegetation.	quipment. w water treatment 3, a dead eeded At the etation and	\$5,000
>> Env	vironme	ntal Proper	ty and Hum	an Health	Matrix			
	nonne	iitai, Fiopei	ty and num	Harm	Matrix			
0.0		Release	Major	Moderate	Minor			
OR		Actual Potential			×	Percent 3.0%		
		rotentia			^			
>>Prog	gramma	tic Matrix	.					
		Falsification	Major	Moderate	Minor	Percent 0.0%		
	Matrix Notes		-	ty to insignific	-	ppearance of the Facility cou ontaminants which would no ealth.		
							+4.050	
						Adjustment	\$4,850	
						Adjustment	\$4,850	\$150
Violatic	on Event	ts				Adjustment	\$4,850	\$150
Violatic	on Event			I]	\$150
Violatic	on Event		/iolation Events	5]	Adjustment 76 Number of violation]	\$150
Violatio	on Event		/iolation Events daily	5]	\$150
Violatio	on Event		daily weekly	5]	\$150
Violatio	on Event		daily weekly monthly	5		76 Number of violation	days	
Violatio	on Event		daily weekly	<u>5</u>			days	
Violatio	on Event		daily weekly monthly quarterly semiannual annual	5 		76 Number of violation	days	
Violatio	on Event		daily weekly monthly quarterly semiannual	5 		76 Number of violation	days	\$150
Violatio	on Event		daily weekly monthly quarterly semiannual annual single event		commended (one	76 Number of violation	days	
		Number of N	daily weekly monthly quarterly semiannual annual single event	x	commended (one	76 Number of violation Violation Bas	days e Penalty	\$750
			daily weekly monthly quarterly semiannual annual single event Five single		commended (one	76 Number of violation Violation Bas	days	
		Number of N	daily weekly monthly quarterly semiannual annual single event Five single	x e events are re		76 Number of violation Violation Bas	days e Penalty	\$750
		Number of N	daily weekly monthly quarterly semiannual annual single event Five single Ply Extraordinary Ordinary	e events are re		76 Number of violation Violation Bas	days e Penalty	\$750
		Number of N	daily weekly monthly quarterly semiannual annual single event Five single	events are re	NOE/NOV to EDPRP/	76 Number of violation Violation Bas	days e Penalty	\$750
		Number of N	daily weekly monthly quarterly semiannual annual single event Five single Ply Extraordinary Ordinary		NOE/NOV to EDPRP/	76 Number of violation Violation Bas	days e Penalty	\$750
		Number of N	daily weekly monthly quarterly semiannual annual single event Five single Ply Extraordinary Ordinary N/A		NOE/NOV to EDPRP/	76 Number of violation Violation Bas Violation Difer Settlement Offer Settlement Offer Settlement Offer Settlement Offer Settlement Offer	days e Penalty	\$750
Good F	aith Effo	Number of N	daily weekly monthly quarterly semiannual annual single event Five single Ply Extraordinary Ordinary N/A	events are re	NOE/NOV to EDPRP/	76 Number of violation Violation Bas Violation Difer Settlement Offer Settlement Offer Settlement Offer Settlement Offer Settlement Offer	days e Penalty [Reduction [\$750
Good F	aith Effo	Number of Norts to Com	daily weekly monthly quarterly semiannual annual single event Five single Ply Extraordinary Ordinary N/A Notes	events are re 0.0% aefore NOE/NOV x The Respond	NOE/NOV to EDPRP/	76 Number of violation Violation Bas	days e Penalty Reduction Subtotal t Test	\$750 \$0 \$750
Good F	aith Effo	Number of Norts to Com	daily weekly monthly quarterly semiannual annual single event Five single Extraordinary Ordinary N/A Notes this violatic	e events are re 0.0% Before NOE/NOV X The Respond	NOE/NOV to EDPRP/ ent does not mee this viola	76 Number of violation Violation Bas e for each location). 'Settlement Offer et the good faith criteria for ation. Violation Ease Violation Bas	days e Penalty Reduction Subtotal t Test alty Total	\$750

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (F	PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
Media	Public Water S					Percent Interest	Years of Depreciation
Violation No.	18						
						5.0	
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		1 		1	1	P	
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$2,000	17-Sep-2020	24-Aug-2022	1.93	\$13	\$258	\$271
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Training/Sampling Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0 \$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a n/a	\$0
Notes for DELAYED costs	treatment pl Tank 3 disinfe chlorine scale the disinfectio	ant, conduct gene ction facility, conc es in the gas chlo n facility at the to	eral housekeepi luct general hou rine room, remo p of the hill on	ng and usekeep ove the Lake Ba	remove the dead in bing at the LAS tar unused equipment aird, and remove the	ain the standing wa mice and mouse dro nk storage room and t and overgrowth of he overgrowth of ve mated date of comp	oppings at the d repair the gas vegetation at egetation at the
Avoided Costs		I IZE avoided c	osts before en	toring	item (except for	r one-time avoide	d costs)
Avoided 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		\$2,000			TOTAL		\$271

		ening Date		Docket No.	2020-1517-MLM-E	PCW
		•	City of Baird (PCW No. 1)			y Revision 4 (April 2014)
Peg		Case ID No. Ference No.			PCW Rev	ision September 1, 2019
Reg.	LIIL KEI		Public Water Supply			
	Enf. C	Coordinator				
	Viola	ation Number	19			-
		Rule Cite(s)	30	Tex. Admin. Code § 290	.42(m)	
	Violatio	n Description	intruder-resistant fence wit Specifically, the sodium per	h lockable gates or in a lo	opurtenances are enclosed by an ocked building in the fence line. aw water pump station was not ant fence.	
					Base Penalty	\$5,000
>> Fn	vironme	ntal Pronei	ty and Human Health	Matrix		
~ ~ LII	VII OIIIIIE	intal, Proper	Harm			
0.0		Release	Major Moderate	Minor		
OR		Actual Potential			Percent 15.0%	
		Fotential	X			
>>Pro	gramma	tic Matrix				
		Falsification	Major Moderate	Minor	Bereent 0.00%	
					Percent 0.0%	
	Matrix Notes		ect the water treatment plar acility to contaminants which		could expose persons served by ective of human health.	
						<u>J</u>
				Ac	djustment \$4,250]
						\$750
	_					
Violati	ion Even	ts				
		Number of \	/iolation Events 3	76	Number of violation days	
			daily weekly]		
			monthly <u>x</u> quarterly		Violation Base Penalty	\$2,250
			semiannual		Violation Base Fenalty	φ2/250
			annual			
			single event			
		Three month		, calculated from the Sep ember 2, 2020 screening	tember 17, 2020 investigation date.	
Good	Faith Eff	orts to Com	ply 0.0%		Reduction	\$0
300u I			Before NOE/NOV			پ 0
			Extraordinary			
			Ordinary			
			N/A x	<u> </u>		
			Notes The Respon	dent does not meet the g this violation.	good faith criteria for	
					Violation Subtotal	\$2,250
Econo	mic Bene	efit (EB) for	this violation		Violation Subtotal Statutory Limit Test	\$2,250
Econo	mic Bene			\$5,416	Statutory Limit Test	
Econo	mic Bene		ed EB Amount			\$2,925

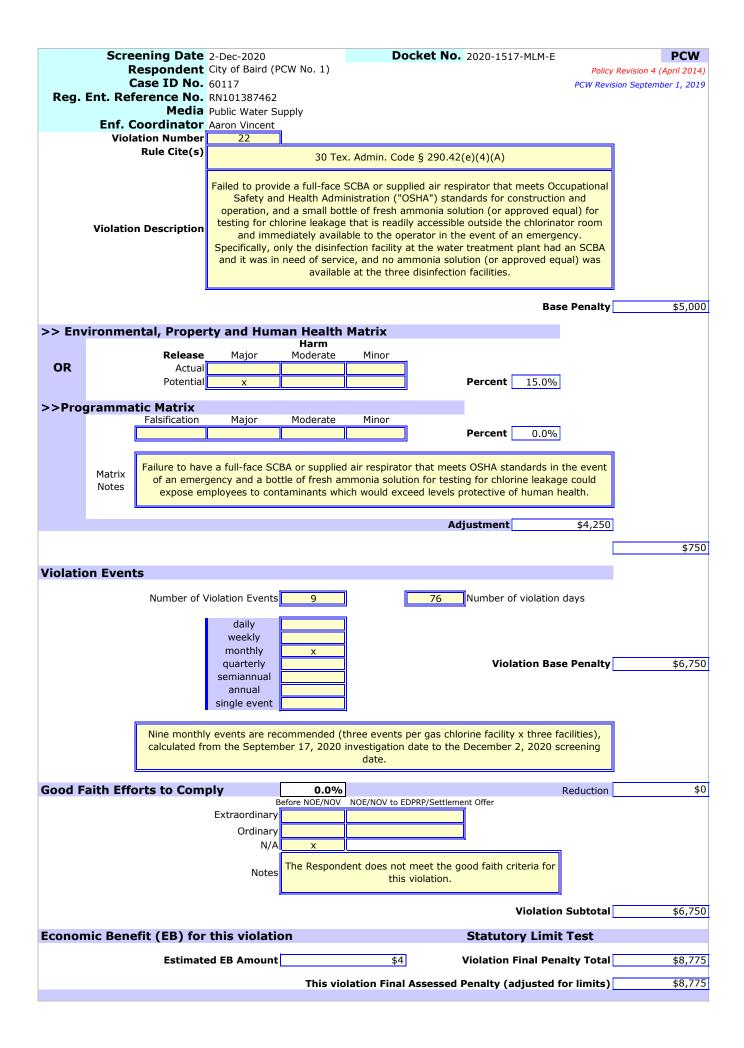
	E	conomic	Benefit	Wo	rksheet		
Respondent		PCW No. 1)					
Case ID No.							
Reg. Ent. Reference No. Media	Public Water S					_	Years of
Violation No.		~~~~				Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$40,000	17-Sep-2020	24-Aug-2022	1.93	\$258	\$5,158	\$5,416
Engineering/Construction				0.00	\$0	\$0	\$0
Land Record Keeping System				0.00	<u>\$0</u> \$0	n/a n/a	\$0 \$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	pump stati storage tan purchase and	ion, purchase a ne k north of Interst d install a LAS day	ew self-containe ate Highway 20 / tank for the ele Public Water Sup	d breat , purch evated ply Imp	hing apparatus (" ase and replace th ground storage ta	all a fence around the second the	ated ground r scales, and te Highway 20
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	[•] one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0 \$0	\$0 \$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		\$40,000			TOTAL		\$5,416



	E	conomic	Benefit	Wo	r ksheet		
Respondent		PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
Media Violation No.	Public Water S 20	Supply				Percent Interest	Years of Depreciation
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	\$1,000	17-Sep-2020	25-Jul-2022	1.85	\$6	\$123	\$129
Buildings	\$1,000	17-3ep-2020	23-341-2022	0.00	\$0	\$125	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Lingineering/ construction				0.00	\$0	n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs		1					
				0.00	<u>\$0</u>		
Other (as needed)	The delayed	cost includes the	estimated amou	0.00 0.00 Int to re	\$0 \$0 epair the fans in th	n/a n/a e gas chlorine room	\$0 \$0
		plant and at the d	isinfection facili	0.00 Int to re ty at th	\$0 epair the fans in th	n/a n/a e gas chlorine room Lake Baird, calculat	\$0 \$0 Is at the water
Other (as needed)	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 Int to re ty at th the est	\$0 epair the fans in th e top of the hill on imated date of cor	n/a n/a e gas chlorine room Lake Baird, calculat	\$0 \$0 Is at the water ted from the
Other (as needed) Notes for DELAYED costs	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 Int to re ty at th the est	\$0 epair the fans in th e top of the hill on imated date of cor	n/a n/a e gas chlorine room Lake Baird, calculat npliance.	\$0 \$0 Is at the water ted from the
Other (as needed) Notes for DELAYED costs Avoided Costs	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 Int to re ty at th the est	\$0 epair the fans in th e top of the hill on imated date of cor item (except for	n/a n/a e gas chlorine room Lake Baird, calculat npliance. one-time avoide	\$0 \$0 is at the water ted from the d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 unt to re ty at th the est tering 0.00 0.00 0.00	\$0 epair the fans in th e top of the hill on imated date of cor item (except for \$0 \$0 \$0	n/a n/a e gas chlorine room Lake Baird, calculat npliance. one-time avoider \$0 \$0 \$0	\$0 \$0 Is at the water ted from the d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 unt to re ty at th the est 0.00 0.00 0.00 0.00 0.00	\$0 epair the fans in th e top of the hill on imated date of cor item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a e gas chlorine room Lake Baird, calculat npliance. * one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 Is at the water ted from the d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 unt to re ty at th the est tering 0.00 0.00 0.00	\$0 epair the fans in th e top of the hill on imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e gas chlorine room Lake Baird, calculat npliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 Is at the water ted from the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 unt to re ty at th the est 0.00 0.00 0.00 0.00 0.00	\$0 epair the fans in th e top of the hill on imated date of cor item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a e gas chlorine room Lake Baird, calculat npliance. * one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 Is at the water ted from the d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 Int to re ty at th the est 0.00 0.00 0.00 0.00 0.00	\$0 epair the fans in th e top of the hill on imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e gas chlorine room Lake Baird, calculat npliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 Is at the water ted from the d costs) \$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)	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 Int to re ty at th the est 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 epair the fans in th e top of the hill on imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e gas chlorine room Lake Baird, calculat npliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 s at the water ted from the \$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	treatment	plant and at the d invest	isinfection facili tigation date to	0.00 Int to re ty at th the est 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 epair the fans in th e top of the hill on imated date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a e gas chlorine room Lake Baird, calculat npliance. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 Is at the water ted from the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date Respondent	2-Dec-2020 City of Baird (PCW N	o. 1)	Docket No. 2020-15		PCW cy Revision 4 (April 2014)
Pog	C	Case ID No.	60117	- /			vision September 1, 2019
Reg.	EIII. KEI		RN101387462 Public Water Supply				
		Coordinator ation Number					
	VIOI	Rule Cite(s)		30 Tox Admin	. Code § 290.42(f)(2)(D)		7
				SU TEX. Authin	. code g 290.42(1)(2)(D)		_
	Violatio	n Description	and spills and provid leak was noted on tl	e protection agai he polyvinyl chlor	n designed to minimize th nst backpressure and siph ide ("PVC") chlorine make disinfection facility at the (noning. Specifically, a e-up water line inside	
						Base Penalty	\$5,000
>> Env	vironme	ntal, Propei	rty and Human H				
		Release		l arm derate Minor	r		
OR		Actual					
		Potential		X	Percent	5.0%	
>>Pro	gramma	tic Matrix	Maian Ma	devete Miner			
		Falsification	Major Moo	derate Mino	Percent	0.0%	
							-
	Matrix Notes	and provide	protection against ba	ckpressure and s	to minimize the possibilit iphoning could expose pe ch would not exceed level ealth.	rsons served by the	
					Adjustment	\$4,750	ס
							\$250
Violati	on Event	ts					
			/iolation Events	1	76 Number	of violation days	
			daily weekly monthly quarterly	x	Vio	lation Base Penalty	/ \$250
			semiannual annual single event				-
		One quarterly		•	om the September 17, 20 20 screening date.	20 investigation date	
Good F	aith Effo	orts to Com		0.0%		Reduction	۱ ۵
				NOE/NOV NOE/NOV	to EDPRP/Settlement Offer		
			Ordinary				
			N/A	x			
			Notes The	Respondent does	not meet the good faith of this violation.	criteria for	
						Violation Subtota	l\$250
Econor	nic Bene	efit (EB) for	this violation		Statute	ory Limit Test	
		_					
		Estimate	ed EB Amount	\$	135 Violation	Final Penalty Tota	\$325

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S	ырріу				Percent Interest	Years of
Violation No.	21						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	[1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$1,000	17-Sep-2020	24-Aua-2022	1.93	\$6	\$129	\$135
Lingineering, construction	\$1,000	17 300 2020	24 Aug 2022	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						e PVC chlorine make hill on Lake Baird, d	
Notes for DELATED Costs	Inside the LAS				stimated date of c		
Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	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		\$1,000			TOTAL		\$135



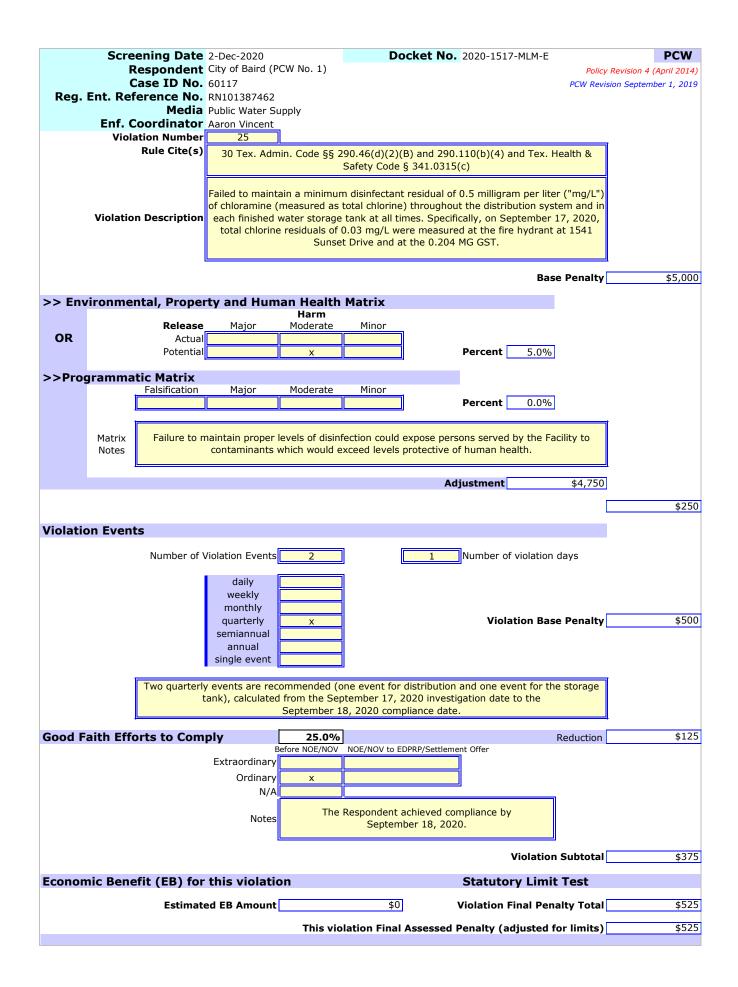
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.		PCW No. 1)					
Reg. Ent. Reference No.							
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	i i						
Delayed Costs				1		1	
Equipment	\$30	17-Sep-2020	25-Jun-2022	1.77	\$0	\$4	\$4
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0 \$0	\$0 \$0	\$0
Lingineering/construction				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
					onomic Benefit Wo	onstruction and ope orksheet for Violation	
Notes for DELAYED costs	The delayed co	disinfection facilit ost (\$30) is the est	ty is captured in stimated amoun	the Eco No. t to pro ated fro	onomic Benefit Wo 19. ovide a small bottle om the investigatio		n solution at each
	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Eco No. t to pro ated fro compli	onomic Benefit Wo 19. ovide a small bottle om the investigatio ance.	orksheet for Violation e of fresh ammonia s on date to the estim	n solution at each ated date of
Notes for DELAYED costs Avoided Costs Disposal	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Eco No. t to pro ated fro compli	onomic Benefit Wo 19. ovide a small bottle om the investigatio ance.	orksheet for Violation	n solution at each ated date of
Avoided Costs	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Eco No. t to pro ated fro compli	onomic Benefit Wo 19. wide a small bottle om the investigatio ance. item (except for	orksheet for Violation e of fresh ammonia on date to the estim	n solution at each ated date of d costs)
Avoided Costs Disposal Personnel	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Eco No. t to pro ated fro compli	onomic Benefit Wo 19. wide a small bottle om the investigatio ance. item (except for \$0	orksheet for Violation of fresh ammonia on date to the estim r one-time avoide \$0	n solution at each ated date of d costs) \$0
Avoided Costs Disposal Personnel	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Eco No. t to pro ated fro compli tering 0.00 0.00 0.00	onomic Benefit Wo 19. vvide a small bottle om the investigation ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	orksheet for Violation of fresh ammonia s on date to the estim r one-time avoide \$0 \$0 \$0 \$0 \$0	solution at each ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Ecc No. t to pro- compli 0.00 0.00 0.00 0.00 0.00	onomic Benefit Wo 19. wide a small bottle om the investigatio ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	solution at each ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Ecc No. t to pro ated fro compli 0.00 0.00 0.00 0.00 0.00 0.00	onomic Benefit Wo 19. Dyide a small bottle om the investigatio ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoider so avoid to the estime on date to the estime r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	solution at each ated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Ecc No. t to pro- compli 0.00 0.00 0.00 0.00 0.00	onomic Benefit Wo 19. wide a small bottle om the investigatio ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	solution at each ated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed co disinfection	disinfection facili ost (\$30) is the e facility (\$10 per	ty is captured in stimated amoun location), calcul	the Ecc No. t to pro ated fro compli 0.00 0.00 0.00 0.00 0.00 0.00	onomic Benefit Wo 19. Dyide a small bottle om the investigatio ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoider so avoid to the estime on date to the estime r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	solution at each ated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2020-1517	-MLM-E	PCW
		lespondent Case ID No.	City of Baird (PCW No. 1)			Revision 4 (April 2014)
Rea.		ference No.			PCW Revi	sion September 1, 2019
j			Public Water Supply			
		Coordinator				
	Viola	ation Number	23			T
		Rule Cite(s)	30 Te:	<. Admin. Code § 290.42(e)(4)(B)		
	Violatio	n Description	buildings or separate roc	rination equipment and cylinders of c ms with impervious walls or partition ectrical equipment from the chlorine	s separating all	
					Base Penalty	\$5,000
>> Env	vironme	ntal, Proper	ty and Human Health	Matrix		
		Deleges	Harm Maior Moderate	Minor		
OR		Release Actual	Major Moderate	Minor		
• · · ·		Potential	x	Percent	15.0%	
			<u> </u>			
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor		
		Faisincation	Major Moderate	Percent	0.0%	
		·				-
	Matrix Notes	Failure to pro		could expose employees of the Facil evels protective of human health.	ity to chlorine gas	
				Adjustment	\$4,250	
					+./===	\$750
						\$750
Violati	on Event	ts				
		Number of \	/iolation Events 3	76 Number of	violation days	
					,.	
			daily			
			weekly monthlyx			
			quarterly	Viola	tion Base Penalty	\$2,250
			semiannual			
			annual			
		I	single event	J		
		Three month		calculated from the September 17, 2 mber 2, 2020 screening date.	2020 investigation	
Good F	aith Eff	orts to Com	ply 0.0%		Reduction	\$0
00001			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Reduction	÷
			Extraordinary			
			Ordinary			
			N/AI <u>x</u>			
			Notes The Respond	lent does not meet the good faith crit this violation.	eria for	
				١	/iolation Subtotal	\$2,250
Econor	mic Bene	efit (EB) for	this violation	Statutor	y Limit Test	
		Estimate	ed EB Amount	\$271 Violation F	inal Penalty Total	\$2,925
				lation Final Assessed Penalty (ad		\$2,925
			i nis Vio	acion rinal Assessed Penalty (ad	justed for limits)	\$2,925

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		, app.)				Percent Interest	Depreciation
	23					5.0	15
	Thom: Coat	Data Danuluad	Final Data	Vera	Interest Saved	Costs Saved	EB Amount
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs	i			-			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$2,000	17-Sep-2020	24-Aug-2022	1.93	\$13	\$258	\$271
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	\$0
Other (as needed)							
					· · · ·	n/a	\$0
Notes for DELAYED costs		the inv	estigation date	int to p to the e	roperly house the stimated date of c	chlorine cylinders, c ompliance.	alculated from
Avoided Costs		the inv	estigation date	int to p to the e	roperly house the stimated date of c item (except for	chlorine cylinders, c ompliance. r one-time avoided	alculated from
Avoided Costs Disposal		the inv	estigation date	to the e	roperly house the stimated date of c item (except for \$0	chlorine cylinders, c ompliance. r one-time avoide \$0	alculated from d costs) \$0
Avoided Costs Disposal Personnel		the inv	estigation date	to the e	roperly house the stimated date of c item (except for \$0 \$0	chlorine cylinders, c ompliance. r one-time avoide \$0 \$0	alculated from d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		the inv	estigation date	to the e to the e 0.00 0.00 0.00	roperly house the stimated date of c item (except for \$0 \$0 \$0	chlorine cylinders, c ompliance. r one-time avoide \$0 \$0 \$0	alculated from d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment		the inv	estigation date	tering 0.00 0.00 0.00 0.00 0.00	roperly house the stimated date of c item (except for \$0 \$0 \$0 \$0 \$0	chlorine cylinders, c ompliance. r one-time avoider \$0 \$0 \$0 \$0	alculated from d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		the inv	estigation date	tering 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	chlorine cylinders, c ompliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	alculated from \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		the inv	estigation date	tering 0.00 0.00 0.00 0.00 0.00 0.00	roperly house the stimated date of c item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	chlorine cylinders, c ompliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	alculated from \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance		the inv	estigation date	tering 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	chlorine cylinders, c ompliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	alculated from \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		the inv	estigation date	tering 0.00 0.00 0.00 0.00 0.00 0.00	roperly house the stimated date of c item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	chlorine cylinders, c ompliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	alculated from \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2020-1	.517-MLM-E	PCW
			City of Baird (PCW No. 1)			Revision 4 (April 2014)
Rea.		Case ID No.	RN101387462		PCW Revis	sion September 1, 2019
			Public Water Supply			
	Enf. C	Coordinator	Aaron Vincent			
	Viola	ation Number	24			r
		Rule Cite(s)	30 Tex	. Admin. Code § 290.111(e)(3)(l	3)	
	Violatio	n Description	at least every four hours tha	he turbidity level of the combine t the system serves water to the monitoring the CFE on the cleary	public. Specifically, the well fill line.	
					Base Penalty	\$5,000
>> En	vironme	ntal, Prope	ty and Human Health	Matrix		
			Harm			
OR		Release Actual	Major Moderate	Minor		
ÖK		Potential		Percer	nt 15.0%	
>>Pro	gramma	tic Matrix	Majau Madauata	Minor		
		Falsification	Major Moderate	Minor Percei	nt 0.0%	
	Matrix Notes			y level of the CFE could expose ich would exceed levels protective		
				A	+4.250	L
				Adjustme	nt \$4,250	
					[\$750
Violati	on Event	ts				
		Number of \	/iolation Events 3	76 Numbe	er of violation days	
			daily weekly monthly x		idation Pace Denalty	\$2,250
			quarterly semiannual annual single event	ľ	iolation Base Penalty	\$2,230
		Three month		calculated from the September a model of the september and the sep	17, 2020 investigation	
Good F	Faith Effo	orts to Com	ply 0.0%		Reduction	\$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
			Extraordinary Ordinary			
				lent does not meet the good fait this violation.	criteria for	
					Violation Subtotal	\$2,250
Econor	mic Bene	efit (EB) for	this violation	Statu	itory Limit Test	
			ed EB Amount		on Final Penalty Total	\$2,925
		Lotindu				
			This vio	lation Final Assessed Penalty	(adjusted for limits)	\$2,925

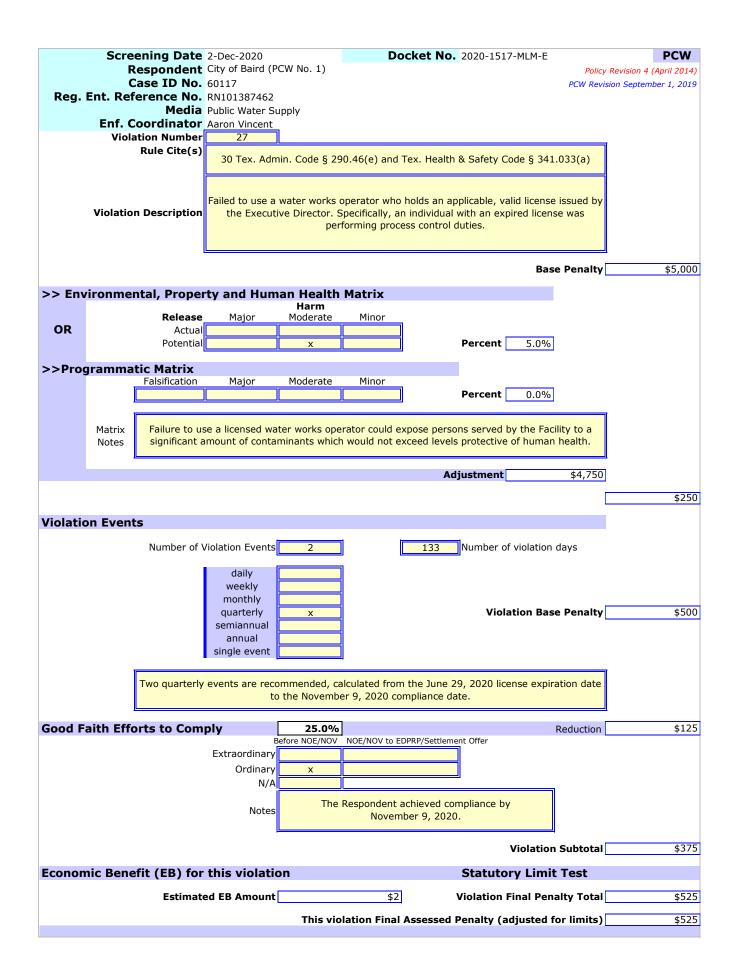
	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.	60117						
leg. Ent. Reference No.	RN101387462						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Casta							
Delayed Costs	·	1			+0	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$500	17-Sep-2020	25-Jun-2022	0.00	\$0 \$44	n/a n/a	<u>\$0</u> \$44
Notes for DELAYED costs					• • • •	toring the CFE on the date of compliance	
Avoided Costs		•	5			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
nspection/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
,		<u></u>		0.00	**	4 0	
Notes for AVOIDED costs							
Approx. Cost of Compliance	[\$500			TOTAL		\$44
Approx. Cost of Compliance		\$200			IUIAL		



	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462	1					
	Public Water S					Percent Interest	Years of Depreciatior
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l i i i i i i i i i i i i i i i i i i i						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				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
· ·		d cost includes th		0.00 ount to	\$0 determine the cau	n/a ise of noncomplianc	\$0 e, make any
Permit Costs	The delaye necessary re 0.5 mg/L	d cost includes th pairs or adjustme of chloramine (me	e estimated am ents to the Facili easured as total	0.00 ount to ty, and chlorine	\$0 determine the cau maintain a minimu e) throughout the	n/a	\$0 e, make any dual of at least and in each
Permit Costs Other (as needed)	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chlorine I from th	\$0 determine the cau maintain a minimu e) throughout the ne investigation da	n/a ise of noncomplianc im disinfectant resid distribution system	\$0 e, make any dual of at least and in each e date.
Permit Costs Other (as needed) Notes for DELAYED costs	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chlorine I from th	\$0 determine the cau maintain a minimu e) throughout the ne investigation da	n/a use of noncomplianc um disinfectant resid distribution system ute to the complianc	\$0 e, make any dual of at least and in each e date.
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	ount to ty, and chlorine from th	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for	n/a use of noncomplianc um disinfectant resid distribution system te to the complianc one-time avoide	\$0 e, make any Jual of at least and in each e date. d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	ount to ty, and chloring from th tering 0.00	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for \$0	n/a use of noncomplianc um disinfectant resid distribution system ite to the complianc one-time avoide \$0 \$0 \$0 \$0	\$0 e, make any dual of at least and in each e date. d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	ount to ty, and chloring from the tering 0.00	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for \$0 \$0	n/a use of noncomplianc um disinfectant resid distribution system te to the complianc one-time avoide \$0 \$0	\$0 e, make any Jual of at least and in each e date. d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chloring from th tering 0.00 0.00	\$0 determine the cau maintain a minimu a) throughout the ne investigation da item (except for \$0 \$0 \$0 \$0	n/a use of noncomplianc um disinfectant resid distribution system ite to the complianc one-time avoide \$0 \$0 \$0 \$0	\$0 e, make any dual of at least and in each e date. d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chloring from th tering 0.00 0.00 0.00	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a use of noncomplianc um disinfectant resid distribution system ite to the complianc one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 e, make any dual of at least and in each e date. d costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chlorine from the tering 0.00 0.00 0.00 0.00 0.00	\$0 determine the cau maintain a minimu b) throughout the ne investigation da item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a se of noncompliance im disinfectant resided distribution system ite to the compliance one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 e, make any dual of at least and in each e date. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chloring from th tering 0.00 0.00 0.00 0.00	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a use of noncomplianc im disinfectant resid distribution system ite to the complianc one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 e, make any Jual of at least and in each e date. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chloring from th tering 0.00 0.00 0.00 0.00	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a use of noncomplianc im disinfectant resid distribution system ite to the complianc one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 e, make any Jual of at least and in each e date. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chloring from th tering 0.00 0.00 0.00 0.00	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a use of noncomplianc im disinfectant resid distribution system ite to the complianc one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 e, make any Jual of at least and in each e date. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delaye necessary re 0.5 mg/L finish	d cost includes th pairs or adjustme of chloramine (me ed water storage	e estimated am ents to the Facili easured as total tank, calculated	0.00 ount to ty, and chloring from th tering 0.00 0.00 0.00 0.00	\$0 determine the cau maintain a minimu e) throughout the ne investigation da item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a use of noncomplianc im disinfectant resid distribution system ite to the complianc one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 e, make any Jual of at least and in each e date. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2020-1517-MLM-E	PCW
			City of Baird (PCW No. 1)		Policy Revision 4 (April 2014)
Peg		Case ID No. ference No.			PCW Revision September 1, 2019
Reg.			Public Water Supply		
	Enf. C	Coordinator			
	Viol	ation Number	26		
		Rule Cite(s)	30	Tex. Admin. Code § 290.42(h)	
	Violatio	n Description	good public health engineer by operating personnel. Sp	d hand washing facilities with established standa ing practices at all installations requiring freque ecifically, the Facility did not have toilet facilities urface water treatment plant.	ent visits
				Base	Penalty \$5,000
>> En	vironme	ntal, Propei	ty and Human Health	Matrix	
			Harm		
OR		Release Actual	Major Moderate	Minor	
U.		Potential		x Percent 3.0%	
		1. Markalaa			
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix Notes		sonnel could expose operator	g facilities at all installations requiring frequent verse to an insignificant amount of contaminants the sprotective of human health.	
				Adjustment	\$4,850
					\$150
	_				\$150
Violati	ion Even	ts			
		Number of \	/iolation Events 1	53 Number of violation d	ays
			daily weekly monthly		
			quarterly semiannual annual single event	Violation Base	Penalty \$150
			One single	event is recommended.	
Good F	Faith Eff	orts to Com	ply 25.0%	R	eduction \$37
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary Ordinary x		
			Ordinary x N/A		
				Respondent achieved compliance by November 9, 2020.	
				Violation	Subtotal \$113
Econor	mic Bene	efit (EB) for	this violation	Statutory Limit	Test
			ed EB Amount	\$1 Violation Final Penal	
		Lotindu			
			This vio	lation Final Assessed Penalty (adjusted fo	r limits) \$158

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (I	PCW No. 1)					
Case ID No.	, ,	,					
Reg. Ent. Reference No.							
	Public Water S	upply					Years of
Violation No.		appiy				Percent Interest	Depreciation
Violation No.	20					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)	\$100	17-Sep-2020	9-Nov-2020	0.15	\$1	n/a	\$1
Notes for DELAYED costs	established sta by o	andards of good p operating personn	ublic health eng el, calculated fr	ineerin om the	g practices at all ir investigation date	nd hand washing fac installations requiring to the compliance of	frequent visits late.
Avoided Costs	ANNU	LIZE avoided c	osts before er	-		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
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$100			TOTAL		\$1



	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.		,					
Reg. Ent. Reference No.							
							Years of
	Public Water S	ирріу				Percent Interest	
Violation No.	27						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)	\$100	29-Jun-2020	9-Nov-2020	0.36	\$2	n/a	\$2
Notes for DELAYED costs	valid license is	sued by the Exec	utive Director, o	calculato dat	ed from the license e.	operator who holds a expiration date to	the compliance
Avoided Costs	ANNU	ALIZE avoided c	osts before er		<u> </u>	r one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 ¢0	\$0 ¢0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)	-			0.00	\$0 \$0	\$0	\$0
Other (as needed)		JI		0.00	\$ U	\$ U	\$ U
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$100			TOTAL		\$2

		ening Date	2-Dec-2020 City of Baird (PCW No. 1)	Docket No. 2020-151		PCW
	C	ase ID No.	60117			v Revision 4 (April 2014) ision September 1, 2019
Reg.	Ent. Ref		RN101387462			
	Enf. C		Public Water Supply Aaron Vincent			
	Viola	ation Number				7
		Rule Cite(s)	30 Te	ex. Admin. Code § 290.42(e)(3)(D)		
	Violatio	n Description	the amount of disinfectant i	or determining the amount of disinferent of the organism of th	gas chlorine scales in	
					Base Penalty	\$5,000
>> Env	vironme	ntal, Proper	rty and Human Health	n Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual		Percent	5.0%	
		Potential	X	Percent	5.0%	
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor		
				Percent	0.0%	
						7
	Matrix Notes	disinfectant	remaining for use could resu	the amount of disinfectant used dai ult in persons served by the Facility I h would not exceed levels protective	being exposed to a	
				Adjustment	\$4,750]
						\$250
Violati	on Event	ts				
Totati			/iolation Events 1	Number o	of violation days	
			daily weekly monthly quarterly x semiannual annual single event	Viol	lation Base Penalty	\$250
		One quarterly	· · · · · · · · · · · · · · · · · · ·	culated from the September 17, 202 ber 2, 2020 screening date.	0 investigation date	
Good F	aith Effo	orts to Com			Reduction	\$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer		
			Ordinary			
			N/A x	<u></u>		
			Notes The Respon	dent does not meet the good faith c this violation.	riteria for	
					Violation Subtotal	\$250
Econor	nic Bene	efit (EB) for	this violation	Statuto	ory Limit Test	
		Estimate	ed EB Amount	\$0 Violation	Final Penalty Total	\$325
			This vi	olation Final Assessed Penalty (a	adjusted for limits)	\$325

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 1)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
	Public Water S						Years of
Violation No.		, apply				Percent Interest	Depreciation
violation No.	. 20					F 0	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed	cost associated wi	th this violation	is capto No.		nic Benefit Workshe	et for Violation
Avoided Costs		ALIZE avoided c	osts before er		· · · ·	one-time avoide	
Disposal	ANNU	ALIZE avoided c	osts before er	0.00	\$0	\$0	\$0
Disposal Personnel	ANNU	ALIZE avoided c	osts before er	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Disposal Personnel Inspection/Reporting/Sampling	; ANNU,	ALIZE avoided c	osts before ei	0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	ANNU,	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	; ANNU/	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
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	ANNU/	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
Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU,	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
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	\$ <u>ANNU</u> ,	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

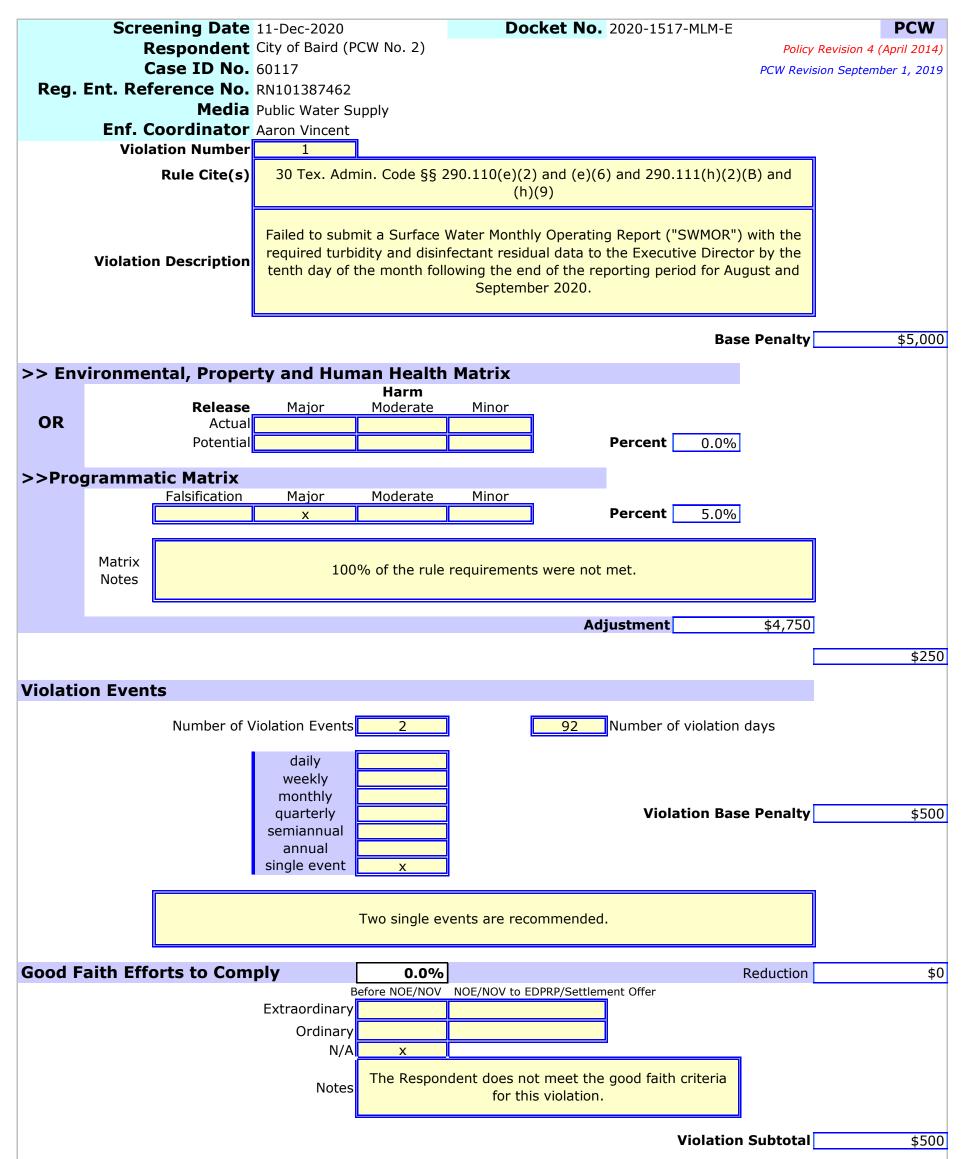
CONTRACTOR OF CO	Policy Rev	vision 4 (April 20		lty Ca	alculatio	n Worksl	neet (PC		ision Septemb	er 1, 2019
DATES As	signed PCW	7-Dec-202 8-Jan-202		reening	11-Dec-2020	EPA Due	31-Mar-2021			
RESPONDENT/		TY INFORM								1
	ef. No.	RN10138746		0. 2)		Major/I	Minor Source	Minor		
CASE INFORMA	_	5 Ablienc								
Enf./Case	ID No.	60117 2020-1517-N	MLM-E			No.	of Violations Order Type			
Media Prog	ram(s)		Supply				t/Non-Profit			•
	I	Limit Minim		\$50 I	Maximum	\$5,000		Enforcement]
				Penalt	v Calcula	tion Secti	on			
TOTAL BASE	PENA	LTY (Sum			/		on	Subtotal 1		\$750
ADJUSTMEN										
Complia		story			30.0%		Subto	otals 2, 3, & 7		\$225
	Notes	Enhancem				e/similar violation nial of liability.	ons and one			
Culpabi	lity	No			0.0%	Enhancement		Subtotal 4		\$0
	Notes	Th	e Respor	ndent does	s not meet the	e culpability crite	eria.			
Good Fa	aith Eff	ort to Comp	ly Total	Adjustm	ents			Subtotal 5		\$0
Econom		efit Total EB Amo I Cost of Complia		\$63 \$244		Enhancement* ed at the Total EB \$	Amount	Subtotal 6		\$0
SUM OF SUB	ΤΟΤΑ	LS 1-7					I	Final Subtotal		\$975
OTHER FACT					RE	0.0%		Adjustment		\$0
Reduces or enhances		Subtotal by the	Indicated	percentage.]		
							Final Pe	nalty Amount		\$975
STATUTORY	LIMI		1ENT				Final Asse	essed Penalty		\$975
DEFERRAL						0.0%	Reduction	Adjustment		\$0
Reduces the Final As								1		
Not	es		No defer	ral is reco	ommended for	Findings Orders	S.			
PAYABLE PE	NALT	ſ								\$975

	Respondent City of Baird (PCW No. 2)	Pol	licy Revision 4 (April 2
	Case ID No. 60117	PCW Re	evision September 1, 2
Reg. Ent. Re	eference No. RN101387462		
	Media Public Water Supply		
Enf.	Coordinator Aaron Vincent		
	Compliance History Worksheet		
	History Site Enhancement (Subtotal 2)		
Compone		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>)	2	10%
	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		0%
Judgmer and Cons	consent decrees meeting criteria)	0	0%
Decree	s final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%
Convictio	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissio	Chronic excessive emissions events (<i>number of events</i>)	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%
	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%
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
other	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment Per	rcentage (Sul	btotal 2) 30%
>> Repeat Viola	tor (Subtotal 3)		
	N/A Adjustment Per	rcentage (Sul	btotal 3) 0%
>> Compliance	History Person Classification (Subtotal 7)		
Satisfact	ory Performer Adjustment Per	rcentage (Sul	btotal 7) 0%
>> Compliance	History Summary		
Complia Histor Notes	denial of liability.	er containing a	
	Total Compliance History Adjustment Percentage (Subtotals 2,	3, & 7) 30%
>> Final Complia	nce History Adjustment		
-	Final Adjustment Percent	age *capped	at 100% 30%

Docket No. 2020-1517-MLM-E

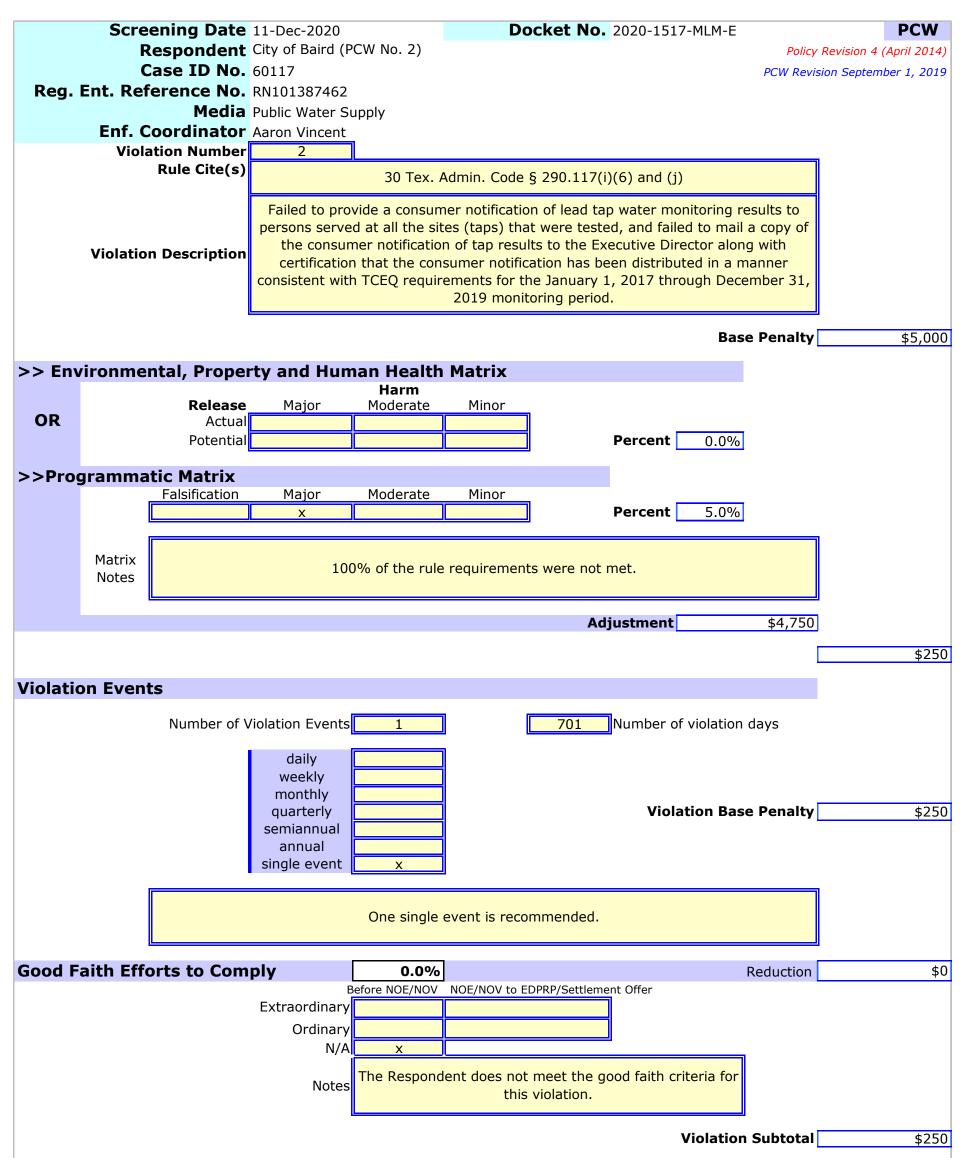
Screening Date 11-Dec-2020

PCW



Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$56 Violation Final Penalty Total \$65
	This violation Final Assessed Penalty (adjusted for limits) \$65

Case ID No eg. Ent. Reference No							
an Ent Rotoronco No	DN101007461						
Media Violation No	Public Water S	supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	ı						
Delayed Costs	5			_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$45	16-Nov-2020	25-Jun-2022	1.61	\$4	n/a	\$4
······································						,	+0
Training/Sampling	\$100	16-Nov-2020	25-Jun-2022	1.61	\$8	n/a	\$8
		16-Nov-2020	25-Jun-2022	1.61	\$8 \$0	n/a n/a	<u>\$8</u> \$0
Training/Sampling		16-Nov-2020	25-Jun-2022				
Training/Sampling Remediation/Disposal	\$100 The delayed of employee t	costs include the eraining to ensure	estimated amou that self-reporti	0.00 0.00 0.00 nt to up	\$0 \$0 \$0 odate the Facility's uirements are prop	n/a n/a operational guidan perly accomplished,	\$0 \$0 \$0 ce and conduct including the
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	\$100 The delayed employee t timely submi	costs include the e raining to ensure ttal of SWMORs, c	estimated amou that self-reporti calculated from t	0.00 0.00 nt to up ng requ he recc	\$0 \$0 odate the Facility's irements are prop ord review date to	n/a n/a operational guidan perly accomplished, the estimated date	\$0 \$0 ce and conduct including the of compliance.
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	\$100 The delayed employee t timely submi	costs include the e raining to ensure ttal of SWMORs, c	estimated amou that self-reporti calculated from t	0.00 0.00 nt to up ng requ he reco tering	\$0 \$0 date the Facility's uirements are prop ord review date to item (except for	n/a n/a operational guidan oerly accomplished, the estimated date	\$0 \$0 ce and conduct including the of compliance. d costs)
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	\$100 The delayed employee t timely submi	costs include the e raining to ensure ttal of SWMORs, c	estimated amou that self-reporti calculated from t	0.00 0.00 nt to up ng requ he reco tering 0.00	\$0 \$0 \$0 odate the Facility's uirements are propord review date to item (except for \$0	n/a n/a operational guidan oerly accomplished, the estimated date	\$0 \$0 ce and conduct including the of compliance. d costs) \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	\$100 The delayed employee t timely submi	costs include the e raining to ensure ttal of SWMORs, c	estimated amou that self-reporti calculated from t	0.00 0.00 nt to up ng requ he reco tering 0.00 0.00	\$0 \$0 \$0 bdate the Facility's propert review date to item (except for \$0 \$0 \$0	n/a n/a operational guidan oerly accomplished, the estimated date r one-time avoide \$0 \$0	\$0 \$0 ce and conduct including the of compliance. d costs) \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	\$100 The delayed employee t timely submi	costs include the e raining to ensure ttal of SWMORs, c	estimated amou that self-reporti calculated from t	0.00 0.00 nt to up ng requ he reco tering 0.00 0.00 0.00	\$0 \$0 \$0 odate the Facility's provid review date to item (except for \$0 \$0 \$0 \$0	n/a n/a operational guidan operational guidan perly accomplished, the estimated date r one-time avoide \$0 \$0 \$0	\$0 \$0 ce and conduct including the of compliance. d costs) \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	\$100 The delayed employee t timely submi	costs include the e raining to ensure ttal of SWMORs, c	estimated amou that self-reporti calculated from t	0.00 0.00 0.00 nt to up ng requ he reco tering 0.00 0.00 0.00 0.00	\$0 \$0 \$0 bdate the Facility's propert review date to item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a operational guidan operational guidan perly accomplished, the estimated date r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 ce and conduct including the of compliance. d costs) \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	\$100 The delayed employee t timely submi	costs include the eraining to ensure ttal of SWMORs, co	estimated amou that self-reporti calculated from t	0.00 0.00 0.00 nt to up ng requ he recc tering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 odate the Facility's provid review date to item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a operational guidant perly accomplished, the estimated date r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 ce and conduct including the of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	\$100 The delayed employee t timely submi	costs include the e raining to ensure ttal of SWMORs, c	estimated amou that self-reporti calculated from t	0.00 0.00 0.00 nt to up ng requ he reco tering 0.00 0.00 0.00 0.00	\$0 \$0 \$0 bdate the Facility's propert review date to item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a operational guidan operational guidan perly accomplished, the estimated date r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 ce and conduct including the of compliance. d costs) \$0 \$0 \$0 \$0 \$0



Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$7 Violation Final Penalty Total \$32
Thi	lation Final Assessed Penalty (adjusted for limits) \$32

eg. Ent. Reference No. Media Violation No.	Public Water S					Percent Interest	Years of Depreciation
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	·	71				1.0	
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0	n/a	\$0
	\$55	31-Dec-2019	25-Jun-2022	2.48	\$7	n/a	\$7
	The delayed	cost includes the	e estimated amo	unt to p	prepare and mail t	n/a he consumer notific	<u>\$7</u> ations for the
Notes for DELAYED costs	The delayed January 1, 2 were sampled	cost includes the 017 through Dece and to the TCEQ	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa	unt to p monito mpled	prepare and mail t ring period to pers locations + \$50) x	n/a	\$7 ations for the ocations which riod), calculated
Avoided Costs	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notifica	unt to p monito mpled tion was	prepare and mail t ring period to pers locations + \$50) x s due to the estima item (except for	n/a he consumer notific sons served at the lo one monitoring per ated date of complia r one-time avoide	\$7 ations for the ocations which iod), calculated ance. d costs)
Avoided Costs Disposal	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notifica	unt to p monito mpled tion was tering 0.00	prepare and mail t ring period to pers locations + \$50) x due to the estimation item (except for \$0	n/a he consumer notific sons served at the lo one monitoring per ated date of complia r one-time avoide \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0
Avoided Costs Disposal Personnel	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notifica	unt to p monito mpled tion was tering 0.00	prepare and mail t ring period to pers locations + \$50) x due to the estimation item (except for \$0 \$0	n/a he consumer notific sons served at the lo one monitoring per ated date of complia r one-time avoide \$0 \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notifica	unt to p monito mpled tion was tering 0.00 0.00	prepare and mail t ring period to pers locations + \$50) x due to the estimation item (except for \$0 \$0 \$0 \$0	n/a he consumer notific sons served at the lo one monitoring per ated date of complia r one-time avoide \$0 \$0 \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notifica	unt to p monito mpled tion was tering 0.00 0.00 0.00 0.00	prepare and mail t ring period to perso locations + \$50) x s due to the estimation item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he consumer notific ons served at the lo one monitoring per ated date of complia r one-time avoide \$0 \$0 \$0 \$0 \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel hspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notificat	unt to p monito mpled tion was tering 0.00 0.00 0.00 0.00 0.00	prepare and mail t ring period to perso locations + \$50) x s due to the estimation item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he consumer notific ons served at the lo one monitoring per ated date of complia r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel hspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notificat	unt to p monito mpled tion was tering 0.00 0.00 0.00 0.00 0.00 0.00	prepare and mail t ring period to person locations + \$50) x s due to the estimation item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he consumer notific ons served at the lo one monitoring per ated date of complia r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel hspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notificat	unt to p monito mpled tion was tering 0.00 0.00 0.00 0.00 0.00	prepare and mail t ring period to perso locations + \$50) x s due to the estimation item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he consumer notific ons served at the lo one monitoring per ated date of complia r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed January 1, 2 were sampled fror	cost includes the 017 through Dece and to the TCEQ n the date the co	e estimated amo ember 31, 2019 ((\$0.50 x 10 sa nsumer notificat	unt to p monito mpled tion was tering 0.00 0.00 0.00 0.00 0.00 0.00	prepare and mail t ring period to person locations + \$50) x s due to the estimation item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a he consumer notific ons served at the lo one monitoring per ated date of complia r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$7 ations for the ocations which iod), calculated ance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

COMMISSION AND COMMISSION	Policy F	Pe Revision 4 (April 2014)	-	Calculation	n Worksh	eet (PC	-	Revision March	26, 2014
DATES	Assigned								
	PCW	9-Dec-2020	Screening	2-Dec-2020	EPA Due				
RESPO		TY INFORMATI							
D		City of Baird (PC	W No. 3)						
	g. Ent. Ref. No. ty/Site Region				Major/M	inor Source	Minor		
		5 Ablienc							
	NFORMATION	60117			No. o	f)/islations	1		
En	f./Case ID No. Docket No.	2020-1517-MLM	-F			f Violations Order Type			
Med	lia Program(s)	Water Quality			Government				
	Multi-Media	Public Water Sup	ply		Enf. (Aaron Vincent		
Adr	nin. Penalty \$ I	Limit Minimum	\$0	Maximum	\$25,000	EC's Team	Enforcement	leam 2	
			<i>ų</i> u		<i>\$237000</i>				
			Pena	lty Calculat	ion Sectio	n			
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation	base penalt	ies)		Subtotal 1		\$1,250
	STMENTS (+	/-) TO SUBTO	NTAL 1						
ADJU:		ptained by multiplying		Penalty (Subtotal 1)	by the indicated pe	ercentage.			
	Compliance Hi	story		30.0%	Adjustment	Subto	tals 2, 3, & 7		\$375
	Notes			's with the same/ containing a den		ns and one			
	Culuchility	Na		0.0%			Cubbabal 4		¢0
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Re	spondent do	es not meet the	culpability crite	ria.			
							I		
	Good Faith Eff	ort to Comply T	otal Adjust	ments			Subtotal 5		\$0
	Economic Ben				Enhancement*		Subtotal 6		\$0
	Estimated	Total EB Amounts I Cost of Compliance	<u>\$44</u> \$500	*Capped	l at the Total EB \$ A	mount			
						_			¢1.625
SUM	OF SUBTOTA	LS 1-7				F	inal Subtotal		\$1,625
OTHE	R FACTORS A	AS JUSTICE M	AY REQU	IRE	0.0%		Adjustment		\$0
		Subtotal by the indic					1		
	Notes								
	Notes								
						Final Pen	alty Amount		\$1,625
CTATI	ITODY I IMIT								¢1.625
SIAI		r adjustmen	11			Final Asse	ssed Penalty		\$1,625
DEFE	RRAL				0.0%	Reduction	Adjustment		\$0
		nalty by the indicated	l percentage.				1		·
	Notes	No c	leferral is re	commended for I	- indings Orders				
ΡΑΥΔ	BLE PENALT	Y							\$1,625
		-						L	

	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%			
	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%			
		Environmental management systems in place for one year or more	No	0%			
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%			
	other	Participation in a voluntary pollution reduction program	No	0%			
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%			
		Adjustment Per	centage (Sub	total 2)	30%		
>> R	epeat Violator	(Subtotal 3)					
	N/A	Adjustment Per	centage (Sub	total 3)	0%		
>> C	ompliance Hist	ory Person Classification (Subtotal 7)					
	Satisfactory Performer 0%						
>> C	>> Compliance History Summary						
	Compliance Enhancement for two NOVs with the same/similar violations and one agreed order containing a denial of liability. Notes Image: Compliance of the same/similar violations and one agreed order containing a denial of liability.						
>> Fir	Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 3>> Final Compliance History Adjustment						
		Final Adjustment Percenta	age *capped a	at 100%	30%		

RespondentCity of Baird (PCW No. 3)Case ID No.60117Reg. Ent. Reference No.RN101387462MediaWater QualityEnf. CoordinatorAaron Vincent

Screening Date 2-Dec-2020

Number of...

Other written NOVs

orders meeting criteria)

>>

Component

NOVs

Compliance History Worksheet Compliance History Site Enhancement (Subtotal 2)

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

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

the current enforcement action (number of NOVs meeting criteria)

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

Number

2

0

1

Adjust.

10%

0%

20%

Docket No. 2020-1517-MLM-E

PCW

	Scre	ening Date	2-Dec-2020	Do	cket No. 2020-1517-MLM-E		PCW
			City of Baird (PCW No. 3)				evision 4 (April 2014)
Rea		Case ID No. ference No.				PCW Rev	vision March 26, 2014
			Water Quality				
		Coordinator					
	Viola	ation Number	1				
		Rule Cite(s)	Te	ex. Water Cod	e § 26.121(a)(1)		
					scharge of sewage, municipal w		
	Violatio	n Description			r industrial waste into or adjace n permanganate saturated the		
			outside of the spill c	ontainment ar	ea at the raw water pump station	on.	
							+25.000
	•				Bas	e Penalty	\$25,000
>> Env	vironme	ntal, Propei	r ty and Human Health Harm	n Matrix			
		Release	Major Moderate	Minor	1		
OR		Actual Potential		X	Percent 5.0%		
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor			
					Percent 0.0%		
					·		
	Matrix				insignificant amounts of pollutar or environmental receptors as a		
	Notes			the violation.		· coure or	
					Adjustment	\$23,750	
					Aujustment	\$25,750	
						L	\$1,250
Violati	on Even	ts					
		Number of \	/iolation Events 1	7	76 Number of violation	davs	
		Humber of t		<u>-</u>		uuys	
			daily				
			weekly monthly				
			quarterly x		Violation Bas	e Penalty	\$1,250
			semiannual annual				
			single event				
		One quarterly	event is recommended, calc to the Decem		ne September 17, 2020 investig	ation date	
				501 27 2020 50			
Good F	aith Effe	orts to Com	ply 0.0%	0		Reduction	\$0
			Before NOE/NOV Extraordinary	NOE/NOV to E	DPRP/Settlement Offer		
			Ordinary				
			N/A x				
			Notes The Respond		meet the good faith criteria for violation.		
						Subtotal	\$1,250
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	: Test	
		Estimate	ed EB Amount	\$44	Violation Final Pen	alty Total	\$1,625
			This vio	lation Final	Assessed Penalty (adjusted f	or limits)	\$1,625

	E	conomic	Benefit	Wo	rksheet		
Respondent	City of Baird (PCW No. 3)					
Case ID No.	60117						
Reg. Ent. Reference No.	RN101387462						
	Water Quality					Percent Interest	Years of Depreciation
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	1			-		-	
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				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)	\$500	17-Sep-2020	25-Jun-2022	0.00 1.77	\$0 \$44	n/a n/a	\$0 \$44
	The delayed perman	d cost includes th ganate tank at th	e estimated amo e raw water pur	1.77 ount to mp stati	\$44 cease the unautho on and to impleme		\$44 n the sodium ent future
Other (as needed) Notes for DELAYED costs	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 ount to mp statione invest	\$44 cease the unautho on and to impleme tigation date to the	n/a prized discharge from ent controls to preve	\$44 n the sodium ent future compliance.
Other (as needed)	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 ount to mp statione invest	\$44 cease the unautho on and to impleme tigation date to the	n/a prized discharge fror ent controls to preve e estimated date of	\$44 n the sodium ent future compliance.
Other (as needed) Notes for DELAYED costs Avoided Costs	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 ount to mp stati ie invest	\$44 cease the unautho on and to impleme tigation date to the item (except fo	n/a prized discharge from ent controls to preve e estimated date of r one-time avoide	\$44 n the sodium ent future compliance. d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 punt to mp statione investigation	\$44 cease the unautho on and to impleme tigation date to the item (except for \$0	n/a prized discharge fror ent controls to preve e estimated date of r one-time avoide \$0	\$44 n the sodium ent future compliance. d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 punt to on p statione investigation tering 0.00 0.00	\$44 cease the unautho on and to impleme tigation date to the item (except for \$0 \$0	n/a prized discharge fror ent controls to preve e estimated date of r one-time avoide \$0 \$0	\$44 In the sodium ant future compliance. d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 punt to p stati ie invest tering 0.00 0.00 0.00	\$44 cease the unauthor on and to impleme tigation date to the item (except for \$0 \$0 \$0	n/a prized discharge from ent controls to preve e estimated date of r one-time avoided \$0 \$0 \$0	\$44 In the sodium ant future compliance. d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 punt to p stati ie invest tering 0.00 0.00 0.00 0.00	\$44 cease the unauthor on and to impleme tigation date to the item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a prized discharge from ent controls to preve e estimated date of r one-time avoide \$0 \$0 \$0 \$0 \$0	\$44 In the sodium ent future compliance. d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 punt to one station perinvestication 1.77 1.7	\$44 cease the unauthor on and to implement igation date to the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a prized discharge from ent controls to preve e estimated date of r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$44 In the sodium ent future compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed perman unauthoriz	d cost includes th ganate tank at th ed discharges, ca	e estimated amo e raw water pur Ilculated from th	1.77 ount to one stati te invest tering 0.00 0.00 0.00 0.00 0.00	\$44 cease the unautho on and to impleme tigation date to the item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a prized discharge from ent controls to preve e estimated date of r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$44 the sodium ent future compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Compliance History Report

Compliance History Report for CN600634182, RN101387462, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator:	CN600634182, City of Baird	Classification: SATISFACTORY	Rating: 31.07		
Regulated Entity:	RN101387462, CITY OF BAIRD	Classification: NOT APPLICABL	E Rating: N/A		
Complexity Points:	N/A	Repeat Violator: N/A			
CH Group:	14 - Other				
Location:	242 Walnut Street in Baird, Callahan County, Texas				
TCEQ Region:	REGION 03 - ABILENE				
ID Number(s): PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0300001 WATER LICENSING LICENSE 0300001					
Compliance History Period: September 01, 2015 to August 31, 2020 Rating Year: 2020 Rating Date: 09/01/2020					
Date Compliance History Report Prepared: May 11, 2021					

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 11, 2016 to May 11, 2021

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

Name: Aaron Vincent

Phone: (512) 239-0855

Site and Owner/Operator History:

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

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

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

- 1 Effective Date: 08/02/2016 ADMINORDER 2016-0258-PWS-E (1660 Order-Agreed Order With Denial) Classification: Moderate
 - Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(2)
 - 30 TAC Chapter 290, SubChapter F 290.110(e)(6)
 - 30 TAC Chapter 290, SubChapter F 290.111(h)(2)(B)
 - 30 TAC Chapter 290, SubChapter F 290.111(h)(9)

Description: SWTR SWMOR Major MR Violation 10/2015 - Failure to submit Surface Water Monthly Operating Report (SWMOR) with the required turbidity and disinfectant residual data by the required deadline for Baird WTP (TP14741). Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(2)

30 TAC Chapter 290, SubChapter F 290.110(e)(6)

- 30 TAC Chapter 290, SubChapter F 290.111(h)(2)(B)
- 30 TAC Chapter 290, SubChapter F 290.111(h)(9)

Description: SWTR SWMOR Major MR Violation 11/2015 - Failure to submit Surface Water Monthly Operating Report (SWMOR) with the required turbidity and disinfectant residual data by the required deadline for Baird WTP (TP14741). Classification: Moderate

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

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

Description: LCR RD MR YR2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the annual reduced monitoring period from 01/01/2015 to 12/31/2015 within the required timeline.

B. Criminal convictions: N/A

C. Chronic excessive emissions events:

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

Item 2	August 31, 2017	(1428526)
Item 3	March 18, 2019	(1552019)
Item 4	September 11, 2019	(1592992)

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

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

1	Date: 10/13/2020 (1691684)
	Self Report? NO Classification: Moderate
	Citation: 30 TAC Chapter 290, SubChapter F 290.111(d)
	30 TAC Chapter 290, SubChapter F 290.111(e)(3)
	30 TAC Chapter 290, SubChapter F 290.111(h)(2)(B)
	30 TAC Chapter 290, SubChapter F 290.111(h)(9)
	Description: SWTR SWMOR Major MR Violation 08/2020 - Failure to submit Surface Water
	Monthly Operating Report (SWMOR) with the required turbidity and disinfectant
	residual data by the required deadline for Baird WTP (TP14741).
_	
2	Date: 11/09/2020 (1691684)
	Self Report? NO Classification: Moderate
	Citation: 30 TAC Chapter 290, SubChapter F 290.111(d)
	30 TAC Chapter 290, SubChapter F 290.111(e)(3)
	30 TAC Chapter 290, SubChapter F 290.111(h)(2)(B)
	30 TAC Chapter 290, SubChapter F 290.111(h)(9)
	Description: SWTR SWMOR Major MR Violation 09/2020 - Failure to submit Surface Water
	Monthly Operating Report (SWMOR) with the required turbidity and disinfectant

residual data by the required deadline for Baird WTP (TP14741).

F. Environmental audits:

N/A

- G. Type of environmental management systems (EMSs): $_{\mbox{N/A}}$
- 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

Component Appendices

Appendix A All NOVs Issued During Component Period 5/11/2016 and 5/11/2021

1	Date:	10/17/2017	(1439258)
			Classification: Minor
	Self Repor		For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.46(j)
	Description	1: Fallure	to conduct customer service inspections. Classification: Minor
	Self Repor		For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.44(h)(1)(B)(i)
	Descriptior	n: Failure	to conduct annual inspections of backflow prevention devices. Classification: Minor
	Self Repor	t? NO	For Informational Purposes Only
	Citation:	30 TAC	C Chapter 290, SubChapter D 290.46(f)(3)(E)(ii)
	Description	n: Failure	to retain the results of chemical analyses for at least ten years. Classification: Minor
	Self Repor	t? NO	For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.46(s)(2)(D)
	Description		to verify the effectiveness of the HACH DR900 and HACH SL1000 every 90
		days.	Classification: Minor
	Self Repor	t? NO	For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.46(s)(2)(B)(i)
	Citation.		C Chapter 290, SubChapter D 290.46(s)(2)(B)(i)
	Description		to properly calibrate the benchtop turbidimeter.
			Classification: Minor
	Self Repor		For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.46(s)(2)(B)(iv) C Chapter 290, SubChapter D 290.46(s)(2)(C)(ii)
	Descriptior		to verify the accuracy of the continuous disinfectant residual analyzer and
	Description		-line turbidimeter.
			Classification: Minor
	Self Repor		For Informational Purposes Only
	Citation:		Chapter 290, SubChapter D 290.46(t)
	Description		to post an ownership sign at the two 0.21 MG elevated ground storage and at the raw water intake.
		tanko t	Classification: Minor
	Self Repor	t? NO	For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.42(e)(4)(C)
	Description		to provide adequate ventilation for the gas chlorine enclosure at the
		injectio	on point after the raw water intake.
2	Date:	11/16/2018	(1525743)
			Classification: Moderate
	Self Repor	t? NO	For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.46(d)
			C Chapter 290, SubChapter D 290.46(d)(2)
			C Chapter 290, SubChapter D 290.46(d)(2)(B) C Chapter 290, SubChapter F 290.110(b)(4)
	Description		to maintain the required total chlorine residual of 0.5 mg/L throughout
		distrib	ution at all times.
			Classification: Moderate
	Self Repor		For Informational Purposes Only
	Citation:		C Chapter 290, SubChapter D 290.46(r) to maintain a minimum pressure of 35 psi throughout distribution.
	Descriptior	n raiiufe	
3*	Date:	01/09/2020	(1622233)
			Classification: Moderate
	Self Repor	t? NO	For Informational Purposes Only
	Citation:	30 TAC	C Chapter 290, SubChapter F 290.110(b)(4)

Description: Failure to maintain a chloramine residual of 0.5 mg/L at all times in the distribution system.

4*	Date: 03	3/02/2020	(1691684)
			Classification: Moderate
	Self Report?	? NO	For Informational Purposes Only
	Citation:		Chapter 290, SubChapter F 290.117(i)(6) Chapter 290, SubChapter F 290.117(j)
	Description:	LCR LCN notice of	06/01/2019 to 09/30/2019 - The system failed to provide a consumer lead tap water monitoring results to persons served at the sites (taps) e tested during the reduced monitoring period from 01/01/2019 to
5	Date: 10	0/13/2020	(1691684)
			Classification: Moderate
	Self Report?	? NO	For Informational Purposes Only
	Citation:	30 TAC (Chapter 290, SubChapter F 290.111(d) Chapter 290, SubChapter F 290.111(e)(3) Chapter 290, SubChapter F 290.111(h)(2)(B)
	Description:	SWTR SV Monthly	Chapter 290, SubChapter F 290.111(h)(9) WMOR Major MR Violation 08/2020 - Failure to submit Surface Water Operating Report (SWMOR) with the required turbidity and disinfectant
		residual	data by the required deadline for Baird WTP (TP14741).
6	Date: 1	1/09/2020	(1691684)
			Classification: Moderate
	Self Report?	? NO	For Informational Purposes Only
	Citation:	30 TAC 0 30 TAC 0	Chapter 290, SubChapter F 290.111(d) Chapter 290, SubChapter F 290.111(e)(3) Chapter 290, SubChapter F 290.111(h)(2)(B) Chapter 290, SubChapter F 290.111(h)(9)
	Description:	SWTR SV Monthly	WMOR Major MR Violation 09/2020 - Failure to submit Surface Water Operating Report (SWMOR) with the required turbidity and disinfectant data by the required deadline for Baird WTP (TP14741).

* NOVs applicable for the Compliance History rating period 9/1/2015 to 8/31/2020

Appendix B

All Investigations Conducted During Component Period May 11, 2016 and May 11, 2021

Item 1	June 13, 2017**	(1414253) For Informational Purposes Only
Item 2*	August 31, 2017**	(1428526) For Informational Purposes Only
Item 3	October 17, 2017**	(1439258) For Informational Purposes Only
Item 4	February 09, 2018**	(1466642) For Informational Purposes Only
Item 5	April 19, 2018**	(1478914) For Informational Purposes Only
Item 6*	March 18, 2019**	(1552019) For Informational Purposes Only
Item 7*	September 11, 2019*	(1592992) For Informational Purposes Only
Item 8	November 16, 2020	(1690744) For Informational Purposes Only
		(1691684)

Item 9November 30, 2020For Informational Purposes Only
(1692210)Item 10December 04, 2020For Informational 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 CITY OF BAIRD RN101387462

BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2020-1517-MLM-E

On _______, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Baird (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26 and 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 242 Walnut Street in Baird, Callahan County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 944 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). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
- 2. During an investigation conducted from September 17, 2020 through September 25, 2020, an investigator documented that:
 - a. Records for the amount of each chemical used each day, the disinfectant residual monitoring results from the distribution system, the calibration records for flow meters, the results of microbiological and chemical analyses, and copies of customer service inspection reports were not maintained on-site for review.

- b. The Respondent did not flush all dead-end mains at monthly intervals.
- c. The Respondent did not inspect the Facility's clearwell annually.
- d. Backflow prevention assemblies ("BPAs") at the following locations had not been tested within the last year (last test): Parker Funeral Home (2/27/2017), Callahan County Jail (3/17/2017), FedEx Freight (10/4/2017), Callahan County Farmers Co-Op (4/5/2018), and the three BPAs at Homestead Nursing and Rehab (1/9/2018). Additionally, the last test dates were unavailable for the two BPAs at the wastewater treament plant and lift station.
- e. The Facility's nitrification action plan ("NAP") did not include sample sites, sampling frequency, or goals for each constituent, nor action levels and corrective actions levels for all of the Facility's entry points.
- f. The Respondent did not conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled.
- g. The Respondent did not calibrate the Facility's pH meter according to manufacturer specifications at least once each day and check with at least one buffer each time a series of samples is run.
- h. The Respondent did not calibrate the Facility's benchtop turbidimeter with primary standards at least once every 90 days and check the calibration with secondary standards each time a series of samples is tested. Additionally, the primary and second standards expired February 2020.
- i. The Respondent did not calibrate the Facility's five on-line turbidimeters with primary standards at least once every 90 days and check the calibration with a primary standard, secondary standard, or manufacturer's proprietary calibration confirmation device or by comparing the results from the on-line unit with the results from a properly calibrated benchtop unit at least once every week.
- j. The Respondent did not verify the accuracy of the manual disinfectant residual analyzers at least once every 90 days using chlorine solutions of known concentrations and did not verify the accuracy of analyzers used to determine the effectiveness of chloramination at least once every 90 days in accordance with the manufacturer's recommendations. Additionally, there was no verification key for one analyzer, no low range secondary standards, and high range standards expired in 2019.
- k. The Respondent did not verify the accuracy of the Facility's continuous disinfectant analyzer at least once every seven days with a chlorine solution of known concentration or by comparing the results from the on-line analyzer with the result of approved benchtop method.

- l. Two hose bibbs at the water treatment plant were not equipped with a vacuum breaker.
- m. The roof hatch for the clearwell at the water treatment plant did not have a lock.
- n. The overflow pipe for Tank No. 2 was flush to the ground and prevented the cover from closing properly. Additionally, the clearwell at the water treatment plant did not have an overflow pipe.
- o. The raw water pump station building had broken windows that allowed intruder access.
- p. The liquid ammonium sulfate ("LAS") stock tank at the disinfection facility at the top of the hill on Lake Baird and the LAS day tank at the disinfection facility at the 0.204 million-gallon ("MG") ground storage tank ("GST") were missing labels identifying their contents.
- q. The LAS day tank at the disinfection facility at the 0.204 MG GST had an opening that allowed entry of contaminants into the tank and did not minimize the possibility of an accidental spill.
- r. The raw water pumps were covered in cobwebs and the raw water pump station building was in need of general maintenance. At the water treatment plant, the chemical injection vaults contained standing water. At Tank No. 3, a dead mouse and mouse droppings were in the disinfection facility and it needed housekeeping, and the LAS tank storage room needed housekeeping. At the disinfection facility at the top of the hill on Lake Baird, overgrowth of vegetation and unused equipment, including unused chemical tanks, were noted. At the sludge lagoon, there was overgrowth of vegetation.
- s. The sodium permanganate tank at the raw water pump station was not secured by an intruder-resistant fence.
- t. The fan in the gas chlorine room at the water treatment plant was not working, and the fan in the gas chlorine room at the disinfection facility at the top of the hill on Lake Baird was not working.
- u. A leak was noted on the polyvinyl chloride ("PVC") chlorine make-up water line inside the LAS day tank room at the disinfection facility at the 0.204 MG GST.
- v. Only the disinfection facility at the water treatment plant had a self-contained breathing apparatus ("SCBA") and it was in need of service, and no ammonia solution (or approved equal) was available at the three disinfection facilities.
- w. The Respondent did not house the gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or

partitions separating all mechanical and electrical equipment from the chlorine facilities.

- x. The Facility was not monitoring the combined filter effluent ("CFE") on the clearwell fill line.
- y. On September 17, 2020, total chlorine residuals of 0.03 milligram per liter ("mg/L") were measured at the fire hydrant at 1541 Sunset Drive and at the 0.204 MG GST.
- z. The Facility did not have toilet facilities at the surface water treatment plant.
- aa. An individual with an expired license was performing process control duties.
- bb. The gas chlorine scales in the gas chlorine room at Tank No. 3 did not work.
- cc. Sodium permanganate saturated the ground outside of the spill containment area at the raw water pump station.
- 3. During a record review conducted from November 16, 2020 through December 4, 2020, an investigator documented that:
 - a. The Respondent did not submit a Surface Water Monthly Operating Report ("SWMOR") with the required turbidity and disinfectant residual data to the Executive Director by the tenth day of the month following the end of the reporting period for August and September 2020.
 - b. The Respondent did not provide a consumer notification of lead tap water monitoring results to persons served at all the sites (taps) that were tested, and failed to mail a copy of the consumer notification of tap results to the Executive Director along with certification that the consumer notification has been distributed in a manner consistent with TCEQ requirements for the January 1, 2017 through December 31, 2019 monitoring period.
- 4. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Facility:
 - a. By September 18, 2020, maintained a minimum total chlorine residual of 0.05 mg/L throughout the distribution system and in each finished water storage tank.
 - b. By November 9, 2020:
 - i. Provided each operator with a key to the toilet facility located next to the surface water treatment plant; and
 - ii. Began using a licensed water works operator to perform all process control duties.

- c. By November 12, 2020, purchased current primary and secondary standards.
- d. By January 26, 2021, provided labels identifying the contents of the LAS stock tank at the disinfection facility at the top of the hill on Lake Baird and the LAS day tank at the disinfection facility at the 0.204 MG GST.

II. CONCLUSIONS OF LAW

- 1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE ch. 26, 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 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)(i)(I), (f)(3)(B)(iii), (f)(3)(B)(iv), (f)(3)(D)(i), (f)(3)(E)(ii), and (f)(3)(E)(iv).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to flush all dead-end mains at monthly intervals, in violation of 30 TEX. ADMIN. CODE § 290.46(l).
- 4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to inspect the Facility's clearwell annually, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(1)(A).
- 5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to have all BPAs tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications, in violation of 30 TEX. ADMIN. CODE § 290.44(h)(4).
- 6. As evidenced by Finding of Fact No. 2.e, the Respondent failed to create a NAP for a system distributing chloraminated water, in violation of 30 TEX. ADMIN. CODE § 290.46(z).
- 7. As evidenced by Finding of Fact No. 2.f, the Respondent failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled, in violation of 30 TEX. ADMIN. CODE § 290.110(c)(5).
- 8. As evidenced by Finding of Fact No. 2.g, the Respondent failed calibrate the Facility's pH meter according to manufacturer specifications at least once each day and check with at least one buffer each time a series of samples is run, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(2)(A).
- 9. As evidenced by Finding of Fact No. 2.h, the Respondent failed to calibrate the Facility's benchtop turbidimeter with primary standards at least once every 90 days and check the calibration with secondary standards each time a series of samples is tested, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(2)(B)(i) and (s)(2)(B)(ii).

- 10. As evidenced by Finding of Fact No. 2.i, the Respondent failed calibrate the Facility's five on-line turbidimeters with primary standards at least once every 90 days and check the calibration with a primary standard, secondary standard, or manufacturer's proprietary calibration confirmation device or by comparing the results from the on-line unit with the results from a properly calibrated benchtop unit at least once every week, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(2)(B)(iii) and (s)(2)(B)(iv).
- 11. As evidenced by Finding of Fact No. 2.j, the Respondent failed to verify the accuracy of the manual disinfectant residual analyzers at least once every 90 days using chlorine solutions of known concentrations and failed to verify the accuracy of analyzers used to determine the effectiveness of chloramination at least once every 90 days in accordance with the manufacturer's recommendations, in violation of 30 TEX. ADMIN. CODE \S 290.46(s)(2)(C)(i) and (s)(2)(D).
- 12. As evidenced by Finding of Fact No. 2.k, the Respondent failed to verify the accuracy of the Facility's continuous disinfectant analyzer at least once every seven days with a chlorine solution of known concentration or by comparing the results from the on-line analyzer with the result of approved benchtop method, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(2)(C)(ii).
- 13. As evidenced by Finding of Fact No. 2.l, the Respondent failed to provide vacuum breakers on each hose bibb within the plant facility, in violation of 30 TEX. ADMIN. CODE § 290.42(d)(2)(A).
- 14. As evidenced by Finding of Fact No. 2.m, the Respondent failed to ensure that the Facility's clearwell roof hatch remains locked except during inspections and maintenance, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(2).
- 15. As evidenced by Finding of Fact No. 2.n, the Respondent failed to maintain the Facility's storage tanks in strict accordance with current American Water Works Association ("AWWA") standards with an overflow pipe that terminates downward with a gravity-hinged and weight cover tightly fitted with no gap over 1/16 inch, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(3).
- 16. As evidenced by Finding of Fact No. 2.0, the Respondent failed to ensure the raw water pump station and all appurtenances are installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates, in violation of 30 TEX. ADMIN. CODE § 290.41(e)(5).
- 17. As evidenced by Finding of Fact No. 2.p, the Respondent failed to provide all chemical bulk storage facilities and day tanks with a label that identifies the tank's contents and a device that indicates the amount of chemical remaining in the tank, in violation of 30 TEX. ADMIN. CODE § 290.42(f)(1)(C).
- 18. As evidenced by Finding of Fact No. 2.q, the Respondent failed to provide chemical bulk storage facilities and day tanks that are designed to minimize the possibility of leaks and spills, in violation of 30 TEX. ADMIN. CODE § 290.42(f)(1)(E).

- 19. As evidenced by Finding of Fact No. 2.r, the Respondent failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, in violation of 30 TEX. ADMIN. CODE § 290.46(m).
- 20. As evidenced by Finding of Fact No. 2.s, the Respondent failed to ensure the water treatment plant and all appurtenances are enclosed by an intruder-resistant fence with lockable gates or in a locked building in the fence line, in violation of 30 TEX. ADMIN. CODE § 290.42(m).
- 21. As evidenced by Finding of Fact No. 2.t, the Respondent failed to provide forced air ventilation, which includes high level and floor level screened and louvered vents, a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent, and a fan switch outside, for enclosures containing more than one 150-pound cylinder of chlorine, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(4)(C).
- 22. As evidenced by Finding of Fact No. 2.u, the Respondent failed to use a chemical feed system designed to minimize the possibility of leaks and spills and provide protection against backpressure and siphoning, in violation of 30 TEX. ADMIN. CODE \S 290.42(f)(2)(D).
- 23. As evidenced by Finding of Fact No. 2.v, the Respondent failed to provide a full-face SCBA or supplied air respirator that meets Occupational Safety and Health Administration ("OSHA") standards for construction and operation, and a small bottle of fresh ammonia solution (or approved equal) for testing for chlorine leakage that is readily accessible outside the chlorinator room and immediately available to the operator in the event of an emergency, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(4)(A).
- 24. As evidenced by Finding of Fact No. 2.w, the Respondent failed to house the gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or partitions separating all mechanical and electrical equipment from the chlorine facilities, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(4)(B).
- 25. As evidenced by Finding of Fact No. 2.x, the Respondent failed to properly monitor the turbidity level of the CFE at least every four hours that the system serves water to the public, in violation of 30 TEX. ADMIN. CODE § 290.111(e)(3)(B).
- 26. As evidenced by Finding of Fact No. 2.y, the Respondent failed to maintain a minimum disinfectant residual of 0.5 mg/L of chloramine (measured as total chlorine) throughout the distribution system and in each finished water storage tank at all times, in violation of 30 TEX. ADMIN. CODE §§ 290.46(d)(2)(B) and 290.110(b)(4) and TEX. HEALTH & SAFETY CODE § 341.0315(c).
- 27. As evidenced by Finding of Fact No. 2.z, the Respondent failed to provide toilet and hand washing facilities with established standards of good public health engineering practices

at all installations requiring frequent visits by operating personnel, in violation of 30 TEX. ADMIN. CODE § 290.42(h).

- 28. As evidenced by Finding of Fact No. 2.aa, the Respondent failed to use a water works operator who holds an applicable, valid license issued by the Executive Director, in violation of 30 TEX. ADMIN. CODE § 290.46(e) and TEX. HEALTH & SAFETY CODE § 341.033(a).
- 29. As evidenced by Finding of Fact No. 2.bb, the Respondent failed to provide facilities for determining the amount of disinfectant used daily and the amount of disinfectant remaining for use, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(3)(D).
- 30. As evidenced by Finding of Fact No. 2.cc, the Respondent failed to prevent an unauthorized discharge of sewage, municipal waste, recreational waste, agricultural waste, or industrial waste into or adjacent to any water in the state, in violation of TEX. WATER CODE § 26.121(a)(1).
- 31. As evidenced by Finding of Fact No. 3.a, the Respondent failed to submit a SWMOR with the required turbidity and disinfectant residual data to the Executive Director by the tenth day of the month following the end of the reporting period, in violation of 30 TEX. ADMIN. CODE §§ 290.110(e)(2) and (e)(6) and 290.111(h)(2)(B) and (h)(9).
- 32. As evidenced by Finding of Fact No. 3.b, the Respondent failed to provide a consumer notification of lead tap water monitoring results to persons served at all the site (taps) that were tested, and failed to mail a copy of the consumer notification of tap results to the Executive Director along with certification that the consumer notification has been distributed in a manner consistent with TCEQ requirements, in violation of 30 TEX. ADMIN. CODE § 290.117(i)(6) and (j).
- 33. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049(a) and TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 34. An administrative penalty in the amount of \$35,405 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE \$ 341.049(b) and TEX. WATER CODE \$ 7.053. Pursuant to TEX. WATER CODE \$ 7.067, \$35,405 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A" incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms and conditions of this Order, which includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

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. 34 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: City of Baird, Docket No. 2020-1517-MLM-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 implement and complete an SEP as set forth in Conclusion of Law No. 34. The amount of \$35,405 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
- 3. The Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Create an organized file system for storing operating records and compile and maintain properly completed water works operation and maintenance records, including records for the amount of the amount of each chemical used each day, the disinfectant residual monitoring results from the distribution system, the calibration records for flow meters, the results of microbiological and chemical analyses, and copies of customer service inspection reports, in accordance with 30 TEX. ADMIN. CODE § 290.46;
 - ii. Modify the flushing program to ensure that all dead-end mains are flushed at monthly intervals, in accordance with 30 TEX. ADMIN. CODE § 290.46;
 - iii. Conduct an inspection of the clearwell, in accordance with 30 TEX. ADMIN. CODE § 290.46;

- iv. Update the Facility's operational guidance and conduct employee training to ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications, in accordance with 30 TEX. ADMIN. CODE § 290.44;
- v. Create an up-to-date and complete system-specific NAP, in accordance with 30 TEX. ADMIN. CODE § 290.46;
- vi. Collect chloramine effectiveness samples to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled, in accordance with 30 TEX. ADMIN. CODE § 290.110. This provision will be satisfied upon six consecutive months of compliant monitoring;
- vii. Calibrate the pH meter according to manufacturer specifications at least once each day and check with at least one buffer each time a series of samples is run, in accordance with 30 TEX. ADMIN. CODE § 290.46;
- viii. Calibrate the benchtop turbidimeter with primary standards and check the calibration with secondary standards each time a series of samples is tested, in accordance with 30 TEX. ADMIN. CODE § 290.46. This provision will be satisfied upon one month of compliant monitoring;
- ix. Calibrate the five on-line turbidimeters with primary standards and check the calibration with a primary standard, secondary standard, or manufacturer's proprietary calibration confirmation device or by comparing the results from the on-line unit with the results from a properly calibrated benchtop unit at least once every week, in accordance with 30 TEX. ADMIN. CODE § 290.46. This provision will be satisfied upon one month of compliant monitoring;
- x. Verify the accuracy of the manual disinfectant residual analyzers using chlorine solutions of known concentrations and verify the accuracy of analyzers used to determine the effectiveness of chloramination in accordance with the manufacturer's recommendations and provide a verification key for each analyzer, in accordance 30 TEX. ADMIN. CODE § 290.46;
- xi. Verify the accuracy of the Facility's continuous disinfectant analyzer at least once every seven days with a chlorine solution of known concentration or by comparing the results from the on-line analyzer with the result of approved benchtop method, in accordance 30 TEX. ADMIN. CODE § 290.46;
- xii. Provide a vacuum breaker for each of the two hose bibbs at the water treatment plant, in accordance 30 TEX. ADMIN. CODE § 290.42;

- xiii. Ensure the raw water pump station and all appurtenances are installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates, including but not limited to repairing the broken windows at the raw water pump station building, in accordance with 30 TEX. ADMIN. CODE § 290.41;
- xiv. Provide a LAS day tank at the disinfection facility at the 0.204 MG GST that is designed to minimize the possibility of leaks and spills, in accordance with 30 TEX. ADMIN. CODE § 290.42;
- xv. Ensure the water treatment plant and all appurtenances are enclosed by an intruder-resistant fence with lockable gates or in a locked building in the fence line, including but not limited to providing an intruder-resistant fence for the sodium permanganate tank at the raw water pump station, in accordance with 30 TEX. ADMIN. CODE § 290.42;
- xvi. Cease the unauthorized discharge from the sodium permanganate tank at the raw water pump station and implement controls to prevent future unauthorized discharges, in accordance with TEX. WATER CODE § 26.121(a)(1);
- xvii. Provide an SCBA that meets OSHA standards for construction and operation at each disinfection facility and provide a small bottle of fresh ammonia solution at each disinfection facility, in accordance with 30 TEX. ADMIN. CODE § 290.42;
- xviii. Monitor the CFE on the clearwell fill line, in accordance with 30 TEX. ADMIN. CODE § 290.111;
- xix. Update the Facility's operational guidance and conduct employee training to ensure that self-reporting requirements are properly accomplished, including the timely submission of signed and certified SWMORs, in accordance with 30 TEX. ADMIN. CODE §§ 290.110 and 290.111;
- Provide consumer notification of lead tap water monitoring results to persons served at all sites (taps) that were tested during the January 1, 2017 through December 31, 2019 monitoring period. Submit to the Executive Director a sample copy of the consumer notification and certification that consumer notification was distributed in a manner consistent with TCEQ requirements, in accordance with 30 TEX. ADMIN. CODE § 290.117; and
- xxi. Begin submitting complete and accurate SWMORs with the required turbidity and disinfection residual data to the Executive Director by the tenth day of the month following the end of each reporting period, in accordance with 30 TEX. ADMIN. CODE §§ 290.110 and 290.111. This

> provision will be satisfied upon six consecutive months of compliant reporting. The SWMORs shall be submitted to:

> > SWMOR Coordinator Water Supply Division, MC 155 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.g below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.a.i through 3.a.v, 3.a.vii, and 3.a.x through 3.a.x.
- c. Within 60 days after the effective date of this Order:
 - i. Ensure that all BPAs are tested upon installation and on an annual basis by a recognized backflow assembly tester and certify that they are operating within specifications, including but not limited to the BPAs at Parker Funeral Home, Callahan County Jail, FedEx Freight, Homestead Nursing and Rehab (three), Callahan County Farmers Co-Op, the wastewater treatment plant, and at each lift station, in accordance with 30 TEX. ADMIN. CODE § 290.44;
 - ii. Provide a lock for the clearwell roof hatch and ensure the roof hatch remains locked except during inspections and maintenance, in accordance 30 TEX. ADMIN. CODE § 290.43;
 - iii. Provide an overflow pipe with a weighted cover that fits tightly with no gap over 1/16 inch in accordance with AWWA standards for Tank No. 2 and the clearwell at the water treatment plant, in accordance with 30 TEX. ADMIN. CODE § 290.43; and
 - iv. Repair the fans in the gas chlorine rooms at the water treatment plant and at the disinfection facility at the top of the hill on Lake Baird, in accordance with 30 TEX. ADMIN. CODE § 290.42.
- d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.g below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.a.viii, 3.a.ix, and 3.c.i through 3.c.iv.
- e. Within 90 days after the effective date of this Order:

- i. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including removing the cobwebs from the raw water pumps and conducting general maintenance at the raw water pump station building, draining the standing water at the water treatment plant, conducting general housekeeping and removing the dead mice and mouse droppings at the Tank No. 3 disinfection facility, conducting general housekeeping at the LAS tank storage room and repairing the gas chlorine scales in the gas chlorine room, removing the unused equipment, including unused chemical tanks, and overgrowth of vegetation at the disinfection facility at the top of the hill on Lake Baird, and removing the overgrowth of vegetation at the sludge lagoon, in accordance with 30 TEX. ADMIN. CODE § 290.46;
- ii. Repair the leak on the PVC chlorine make-up water line inside the LAS day tank room at the disinfection facility at the 0.204 MG GST, in accordance with 30 TEX. ADMIN. CODE § 290.42; and
- iii. Properly house the gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or partitions separating all mechanical and electrical equipment from the chlorine facilities, in accordance with 30 TEX. ADMIN. CODE § 290.42.
- f. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.g below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.e.i through 3.e.iii.
- g. Within 225 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.a.vi and 3.a.xxi. 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 Abilene Regional Office Texas Commission on Environmental Quality 1977 Industrial Boulevard Abilene, Texas 79602-7833

and a copy to:

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

- 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. If the Respondent fails to comply with Ordering Provision Nos. 2 and 3.a.xvi in this Order within the prescribed schedule, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 7. 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.

- 8. 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.
- 9. 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.
- 10. 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 11. 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.
- 12. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

For the Executive Director

9/14/2022 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 TCEO, 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
- TCEO seeking other relief as authorized by law.

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

Signature

Name (Printed or typed) Authorized Representative of City of Baird

7-12-2022 Date City Admini Strator

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

Attachment A

Docket Number: 2020-1517-MLM-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	City of Baird
Penalty Amount:	Thirty-Five Thousand Four Hundred Five Dollars (\$35,405)
SEP Offset Amount:	Thirty-Five Thousand Four Hundred Five Dollars (\$35,405)
Type of SEP:	Compliance
Project Name:	Public Water Supply Improvements
Location of SEP:	Callahan County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset the administrative Penalty Amount assessed in this Agreed Order for Respondent to perform a Supplemental Environmental Project ("SEP"). The SEP Offset Amount is set forth above and such offset is conditioned upon completion of the project in accordance with the terms of this Attachment A.

Respondent is a Local Government that qualifies under Texas Water Code § 7.067 to apply the SEP Offset Amount set forth above to correct violations at its public water supply ("the Facility") which are described in this Agreed Order.

1. Project Description

A. Project

Respondent shall hire a contractor to purchase and install a fence around the raw water pump station. Respondent will purchase a new self-contained breathing apparatus (SCBA) for the elevated ground storage tank north of I-20. Respondent will purchase and replace three chlorine cylinder scales. Respondent will also purchase and install a liquid ammonium sulfate (LAS) day tank for the elevated ground storage tank north of I-20. Specifically, the SEP Offset Amount shall be used for materials, supplies, and equipment for one or more of the following: fencing, SCBA, chlorine cylinder scales, and LAS day tank (the "Project"). Respondent shall solicit bids from qualified contractors to perform the Project. Any advertisement, including publication, related to the SEP must include the enforcement statement as stated in Section 6, Publicity. The SEP will be performed in accordance with all federal, state, and local environmental laws and regulations, including permits that may be required prior to commencement of the SEP.

Respondent shall use the SEP Offset Amount only for the direct cost of implementing the Project, including supplies, materials, and equipment rentals, as listed in Subsection C. Minimum Expenditure, Estimated Cost Schedule, below. No portion of the SEP Offset Amount shall be spent on administrative costs, including but not limited to operating costs, reporting expenses, handling of expenses, project coordination, liability, or equipment breakdowns.

Respondent's signature affixed to the attached Agreed Order certifies that Respondent has no prior commitment to perform this Project and that the SEP is being performed solely as part of the terms of settlement in this enforcement action.

City of Baird Docket No. 2020-1517-MLM-E Attachment A

B. Environmental Benefit

This SEP will provide access to safe drinking water. Safe, reliable drinking water is necessary for human health and household sanitation. Untreated water may harbor bacteria, viruses, protozoa (parasitic organisms), helminths (intestinal worms), and bioaerosols (inhalable molds and fungi). The diseases they may cause range in severity from illnesses like gastroenteritis to life-threatening ailments such as cholera, dysentery, infectious hepatitis, and severe gastroenteritis. Safe water is also necessary in the home for bathing, flushing toilets, washing hands, and cooking.

C. Minimum Expenditure

Respondent shall spend at least the SEP Offset Amount to complete the project described in Section 1, above, and comply with all other provisions of this SEP. Respondent understands that it may cost more than the SEP Offset Amount to complete the Project.

Item	Quantity	Cost	Units	Total
Fence Installation	1	\$27,000	Each	\$27,000
Self-Contained Breathing Apparatus	1	\$5,000	Each	\$5,000
Chlorine Cylinder Scales	3	\$2,000	Each	\$6,000
Liquid Ammonium Sulfate Day Tank	1	\$2,000	Each	\$2,000
Total				\$40,000

Estimated Cost Schedule

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, Respondent shall begin implementation of the SEP. Respondent shall have completed the SEP in its entirety within 105 days after the effective date of this Agreed Order.

3. Records and Reporting

A. Progress Report

Within 30 days after the effective date of this Agreed Order, Respondent shall submit a Notice of Commencement to the TCEQ describing actions performed to date to implement the Project. Within 90 days after the effective date of this Agreed Order, Respondent shall submit a report detailing the progress made and all actions completed on the Project during the previous 60-day period and setting forth a schedule for achieving completion of the Project within the 105-day timeframe set forth in Section 2, Performance Schedule, above. Thereafter, Respondent shall submit progress reports to the TCEQ containing detailed information on all actions completed on the Project to date as set forth in the Reporting Schedule table below:

City of Baird Docket No. 2020-1517-MLM-E Attachment A

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

Reporting Schedule

B. Final Report

Within 105 days after the effective date of the Agreed Order, or within 30 days after completion of the SEP, whichever is earlier, Respondent shall submit a Final Report to the TCEQ, which shall include the following:

- 1. Itemized list of expenditures and total cost of the Project;
- 2. Copies of invoices or receipts corresponding to the itemized list in paragraph 3.B.1., above;
- 3. Copies of cleared checks or payment records corresponding to the itemized list in paragraph 3.B.1., above;
- 4. Copies of proof of advertisement of invitation for bids, if applicable;
- 5. A certified statement of SEP completion and document authentication;
- 6. Detailed map showing specific location of the project site(s);
- 7. Equipment logs showing the hours the equipment was utilized on the project, if applicable;
- 8. Dated photographs of the purchased materials and supplies; before and after work being performed during the Project; and of the completed Project; and
- 9. Any additional information Respondent believes will, or that is requested by TCEQ to demonstrate compliance with this Attachment A.
- C. Address

Respondent shall submit all SEP reports and any additional information as requested to the following address:

Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 P.O. Box 13087 Austin, Texas 78711-3087 City of Baird Docket No. 2020-1517-MLM-E Attachment A

4. Additional Information and Access

Respondent shall provide additional information as requested by TCEQ staff and shall allow access to all records related to the SEP Offset Amount. Respondent shall also allow representatives of the TCEQ access to the site of any work being financed in whole or in part by the SEP Offset Amount. This provision shall survive the termination of this Agreed Order.

5. Failure to Fully Perform

If Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 through 4 above, the Executive Director ("ED") may require immediate payment of all or part of the SEP Offset Amount as set forth in the attached Agreed Order.

In the event the ED determines that Respondent failed to fully implement and complete the Project, Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for reimbursement of a SEP, shall make the check payable to "Texas Commission on Environmental Quality," and shall mail it to:

Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 P.O. Box 13087 Austin, Texas 78711-3087

6. Publicity

Any public statements concerning this Project made by or on behalf of Respondent must include a clear statement that **the Project was performed as part of the settlement of an enforcement action brought by the TCEQ**. Such statements include advertising, public relations, and press releases.

7. Recognition

Respondent may not seek recognition for this project in any other state or federal regulatory program.

8. Other SEPs by TCEQ or Other Agencies

The SEP Offset Amount identified in this Attachment A and in the attached Agreed Order has not been, and shall not be, included as a SEP for Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.