## Executive Summary – Enforcement Matter – Case No. 60406 NORTHERN HILLS DEVELOPMENT CO., INC. RN101267565

Docket No. 2021-0274-MLM-E

## **Order Type:**

1660 Agreed Order

**Findings Order Justification:** 

N/A

**Media:** 

MLM - PWS, WR

**Small Business:** 

Yes

**Location(s) Where Violation(s) Occurred:** 

Northern Hills Water Service, located 0.2 miles north of the intersection of Allred Circle and Stinson Road, Denison, Grayson 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: December 3, 2021

Comments Received: No

## **Penalty Information**

**Total Penalty Assessed:** \$11,297

**Amount Deferred for Expedited Settlement: \$2,259** 

**Total Paid to General Revenue:** \$298 **Total Due to General Revenue:** \$8,740

Payment Plan: 30 payments of \$288 each and one final payment of \$100

**Compliance History Classifications:** 

Person/CN - N/A Site/RN - N/A

Major Source: No

**Statutory Limit Adjustment:** N/A **Applicable Penalty Policy:** April 2014

## **Investigation Information**

**Complaint Date(s):** N/A **Complaint Information**: N/A

**Date(s) of Investigation:** December 16, 2020 to December 22, 2020 and February

21, 2021

Date(s) of NOE(s): February 5, 2021

## Violation Information

- 1. Failed to operate the Facility under the direct supervision of a water works operator who holds a Class "D" license or higher [30 Tex. Admin. Code § 290.46(e)(3)(A) and Tex. Health & Safety Code § 341.033(a)].
- 2. Failed to maintain a drought contingency plan which includes all elements for municipal use by a retail public water supplier [30 Tex. Admin. Code §§ 288.20(a) and 288.30(5)(B) and Tex. Water Code § 11.1272(c)].
- 3. Failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference [30 Tex. Admin. Code § 290.42(l)].
- 4. Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated [30 Tex. Admin. Code § 290.45(f)(1)].
- 6. Failed to create a nitrification action plan for all systems distributing chloraminated water [30 Tex. Admin. Code § 290.46(z)].
- 7. Failed to flush all dead-end mains at monthly intervals [30 Tex. Admin. Code § 290.46(l)].
- 8. Failed to monitor the disinfectant residual at representative locations throughout the distribution system at least once every seven days [30 Tex. Admin. Code § 290.110(c)(4)(A)].

- 9. Failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted [30 Tex. Admin. Code § 290.46(i)].
- 10. 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)].
- 11. Failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies [30 Tex. ADMIN. CODE  $\S$  290.46(n)(2)].
- 12. Failed to pay annual Public Health Service fees and/or any associated late fees for TCEQ Financial Administration Account No. 90910126 for Fiscal Years 2019, 2020, and 2021 [30 Tex. Admin. Code § 290.51(a)(6) and Tex. Water Code § 5.702].

## Corrective Actions/Technical Requirements

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

N/A

## **Technical Requirements:**

The Order will require the Respondent to:

- a. Within 30 days:
- i. Submit payment for all outstanding fees, interest, and penalties for TCEQ Financial Administration Account No. 90910126;
- ii. Begin operating the Facility under the direct supervision of a water works operator who hold a class "D" or higher license;
- iii. Compile and maintain properly completed water works operation and maintenance records, including the amount of water distributed each week, the date, location, and nature of water quality, pressure, or outage complaints received by the system and the results of any subsequent complaint investigation, copies of any public notice issued by the water system, results of microbiological analyses, Consumer Confidence Report compliance documentation, results of chemical analyses, any written reports, summaries, or communications relating to sanitary surveys, copies of the Customer Service Inspection reports, any Sample Siting Plans and monitoring plans, and records relating to lead and copper requirements were not maintained on-site for review;

- iv. Create a nitrification action plan;
- v. Begin flushing all dead-end mains at monthly intervals or more often as needed if water quality complaints are received from water customers or if disinfectant residuals fall below acceptable levels. This provision will be satisfied upon three months of consecutive complaint monthly flushing;
- vi. Monitor the disinfectant residual at representative locations throughout the distribution system at least once every seven days;
- vii. Begin collecting all required 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; and
- viii. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies.
- b. Within 45 days, submit written certification to demonstrate compliance with a.ii. through a.iv., a.vi., and a.viii.
- c. Within 60 days, develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference.
- d. Within 75 days, submit written certification to demonstrate compliance with c.
- e. Within 90 days:
- i. Prepare and adopt a complete drought contingency plan; and
- ii. Adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted.
- f. Within 105 days, submit written certification to demonstrate compliance with e.
- g. Within 135 days, submit written certification to demonstrate compliance with a.v.
- h. Within 180 days, to secure a water purchase contract.
- i. Within 195 days, submit written certification to demonstrate compliance with h.
- j. Within 225 days, submit written certification to demonstrate compliance with a.vii.

## **Contact Information**

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Carlos Molina, Enforcement Division,

Enforcement Team 2, MC 219, (512) 239-2557; Michael Parrish, Enforcement Division,

MC 219, (512) 239-2548

Respondent: R. Bruce Wilkins, President, NORTHERN HILLS DEVELOPMENT CO.,

INC., 21306 Park Royale Drive, Katy, Texas 77450

**Respondent's Attorney:** N/A



## Penalty Calculation Worksheet (PCW)

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

**DATES** 

Assigned 8-Feb-2021 PCW 9-Feb-2021

Screening 16-Feb-2021

**EPA Due** 

RESPONDENT/FACILITY INFORMATION						
Respondent NORTHERN HILLS DEVELOPMENT CO., INC.	(PCW 1)					
Reg. Ent. Ref. No. RN101267565						
Facility/Site Region 4-Dallas/Fort Worth	Major/Minor Source Minor					

CASE INFORMATION					
Enf./Case ID No. 60406			No.	of Violations	11
Docket No. 2021-0274-MLM	-E			Order Type	1660
Media Program(s) Public Water Sup	ply		Governmer	t/Non-Profit	No
Multi-Media Water Rights			Enf	. Coordinator	Carlos Molina
			<u>-</u>	EC's Team	Enforcement Team 2
Admin. Penalty \$ Limit Minimum	\$50	Maximum	\$5,000		

			Donalty (	Calcula	tion Soction	<u></u>		
TOTAL DAG	CE DENIA	LTV (Come	•		tion Section	ווע		44 775
IOIAL BAS	SE PENA	LIY (Sum o	f violation bas	e penan	ties)		Subtotal 1	\$4,775
<b>ADJUSTME</b>	ENTS (+	/-) TO SUBT	OTAL 1					
	als 2-7 are ob pliance Hi		ng the Total Base Penalt	y (Subtotal 1 <b>0.0%</b>	<ul> <li>by the indicated position.</li> <li>Adjustment</li> </ul>		otals 2, 3, & 7	\$0
Comp	Notes	3.0. y	No adjustment fo			Subte	,	Ψ0
Culpa	ability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The R	espondent does no	t meet the	culpability crite	eria.		
Good	Faith Eff	ort to Comply	Total Adjustment	s			Subtotal 5	\$0
3302		ore to compry						
Fcon	omic Bene	efit		0.0%	Enhancement*		Subtotal 6	\$0
		Total EB Amounts Cost of Compliance			d at the Total EB \$ A	Amount		43
SUM OF SU	JBTOTA	LS 1-7				ı	Final Subtotal	\$4,775
		AS JUSTICE I	MAY REQUIRE icated percentage.		131.4%		Adjustment	\$6,272
P	Notes		l enhancement to cassociated with Vio	•		compliance		
						Final Pe	nalty Amount	\$11,047
STATUTOR	RY LIMIT	T ADJUSTME	NT			Final Asse	essed Penalty	\$11,047
DEFERRAL					20.0%	Reduction	Adjustment	-\$2,209
Reduces the Final	l Assessed Pe	nalty by the indicate	ed percentage.					
P	Notes		Deferral offered fo	r expedite	d settlement.			
PAYABLE F	PENALT	Y						\$8,838

Policy Revision 4 (April 2014)

PCW Revision September 1, 2019

Screening Date 16-Feb-2021

**Docket No.** 2021-0274-MLM-E

Respondent NORTHERN HILLS DEVELOPMENT CO., INC. (PCW 1)

**Case ID No.** 60406

Reg. Ent. Reference No. RN101267565

Media Public Water Supply

Enf. Coordinator Carlos Molina

·	mulianes Hist	Compliance History Worksheet			
	Component	ory <i>Sit</i> e Enhancement (Subtotal 2)  Number of	Number	Adjust.	
	NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%	
		Other written NOVs	0	0%	
		Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	0	0%	
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%	
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%	
	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%	
- 1					
		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%	
	Gener	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	ototal 2)	0%
> Re	peat Violator	(Subtotal 3)			
[	N/A	Adjustment Per	rcentage (Sub	ototal 3)	0%
> Co	mpliance Hist	ory Person Classification (Subtotal 7)			
	N/A	Adjustment Per	centage (Sub	ototal 7)	0%
> Co	mpliance Hist	ory Summary			
	Compliance History Notes	No adjustment for Compliance History.			
. =-		Total Compliance History Adjustment Percentage (	Subtotals 2,	3, & 7)	0%
>> Fina	I Compliance	History Adjustment Final Adjustment Percent	age *capped	at 100%	0%

		ening Date				<b>ket No.</b> 2021-0274-MLM-E		PCW
		•	NORTHERN HIL	LS DEVELOPM	IENT CO., INC	C. (PCW 1)	Policy	Revision 4 (April 2014)
_		Case ID No.					PCW Revis	sion September 1, 2019
Reg.	Ent. Rei	ference No.						
	Enf (		Public Water Su	ірріу				
		Coordinator ation Number						
	¥101							
		Rule Cite(s)	30 Tex. Ad	dmin. Code § 1	290.46(e)(3)( 341.03	(A) and Tex. Health & Safety Co 33(a)	ode §	
	Violatio	n Description	Failed to operat			ect supervision of a water work	s operator	
		-		wno no	ids a Class L	" license or higher.		
						Base	e Penalty	\$5,000
> > F		mtal Duaman		!!!# -	Makuisa			
>> En	vironme	ntai, Propei	ty and Hum	an Health Harm	matrix			
		Release	Major	Moderate	Minor			
OR		Actual						
		Potential	Х			Percent 15.0%		
>> Pro	aramma	tic Matrix						
// 10	grannia	Falsification	Major	Moderate	Minor			
						Percent 0.0%		
	Matrix					an operator with the appropria		
	Notes		•	•	•	se persons served by the Facili re protective of human health.	ty to	
		Con	tarrillarits writer	Would exceed	i levels tilat a	re protective of numari fleatiff.		
						Adjustment	\$4,250	
								+750
							L	\$750
Violati	on Even	ts						
		Ni	rataria e e cara		F	S November of distantion	4	
		Number of V	/iolation Events	2	L	62 Number of violation	aays	
			daily					
			weekly					
			monthly	Х				
			quarterly			Violation Base	e Penalty	\$1,500
			semiannual annual					
			single event					
			5 5 7 7 7					
		Two monthly e	events are recon	nmended, calc	ulated from t	he December 16, 2020 investig	ation date	
		,,		the February				
Good F	Faith Effo	orts to Com	ply	0.0%			Reduction	\$0
				efore NOE/NOV	NOE/NOV to ED	PRP/Settlement Offer		
			Extraordinary					
			Ordinary					
			N/A	Х				
			Notes	The Responde		neet the good faith criteria for		
					this v	riolation.		
						Violation	Subtotal	¢1 F00
							Subtotal	\$1,500
Econor	mic Bene	efit (EB) for	this violation	on		Statutory Limit	Test	
		Estimate	ed EB Amount		\$6,161	<b>Violation Final Pena</b>	alty Total	\$3,470
				This viola	tion Final ∆	ssessed Penalty (adjusted f	or limits\	\$3,470
				5 41016	o I iliai A		J	ψ3,170

	E	conomic	Benefit	Wo	rksheet		
		LLS DEVELOPMEN	IT CO., INC. (Po	CW 1)			
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.	Public Water S	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	<b>EB Amount</b>
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 \$0	n/a n/a	\$0 \$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs							
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel	\$36,192	16-Dec-2020	16-Feb-2021	0.17	\$13	\$6,148	\$6,161
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0 \$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)  Notes for AVOIDED costs				l salary	of a water works	operator who holds attention to the screening	a minimum of a
Approx. Cost of Compliance		\$6,148			TOTAL		\$6,161

		ening Date		<b>Docket No.</b> 2021-0274-MLM-E	PCW
	R	espondent	NORTHERN HIL	LS DEVELOPMENT CO., INC. (PCW 1)  Policy	y Revision 4 (April 2014)
		ase ID No.		PCW Revi	ision September 1, 2019
Reg.	Ent. Ref	erence No.	RN101267565		
			Public Water St	upply	
	Enf. C	coordinator	Carlos Molina		
	Viola	ation Number	2		
		Rule Cite(s)	30 Te	x. Admin. Code § 290.51(a)(6) and Tex. Water Code § 5.702	
			55 . 6.		
			Fello d be seen	Della Halli Caria Garandan and America	
	Violatio	n Description		annual Public Health Service fees and/or any associated late fees for al Administration Account No. 90910126 for Fiscal Years 2019, 2020,	
	Violatio	ii bescription	TCLQ Tillalicia	and 2021.	
				3.10 2022	
					1
				Base Penalty	\$5,000
>> Env	vironme	ntal, Proper	ty and Hum	an Health Matrix	
		Release	Major	Harm Mederate Miner	
OR		Actual	Major	Moderate Minor	
OK		Potential		Percent 0.0%	
		Fotential		Percent 0.0%	
>>Pro/	aramma	tic Matrix			
110	gramma	Falsification	Major	Moderate Minor	
				Percent 0.0%	
					]
	Matrix				
	Notes				
					4
				Adjustment \$5,000	
					\$0
Violatia					
	an Evani	ha.			
Violatio	on Event	ts			I
Violatio	on Event		/iolation Events	Number of violation days	
Violatio	on Event		/iolation Events	Number of violation days	
riolativ	on Event			Number of violation days	
	on Event		daily	Number of violation days	
Violation	on Event			Number of violation days	
Violation	on Event		daily weekly	Number of violation days  Violation Base Penalty	\$0
riodu	on Event		daily weekly monthly		\$0
	on Even		daily weekly monthly quarterly		\$0
	on Even		daily weekly monthly quarterly semiannual		\$0
	on Even		daily weekly monthly quarterly semiannual annual		\$0
	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalty	\$0
	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event		\$0
	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalty  determined by the Financial Administration Division at the next billing	\$0
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.	
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction	\$0 \$0
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.	
		Number of N	daily weekly monthly quarterly semiannual annual single event and fees will be o	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction	
		Number of N	daily weekly monthly quarterly semiannual annual single event and fees will be o	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
		Number of N	daily weekly monthly quarterly semiannual annual single event and fees will be o	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction	
		Number of N	daily weekly monthly quarterly semiannual annual single event  and fees will be of  Extraordinary Ordinary N/A	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Reduction  X  The Respondent does not meet the good faith criteria for	
		Number of N	daily weekly monthly quarterly semiannual annual single event and fees will be o	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Reduction  X	
		Number of N	daily weekly monthly quarterly semiannual annual single event  and fees will be of  Extraordinary Ordinary N/A	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Reduction  X  The Respondent does not meet the good faith criteria for	
		Number of N	daily weekly monthly quarterly semiannual annual single event  and fees will be of  Extraordinary Ordinary N/A	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Reduction  X  The Respondent does not meet the good faith criteria for	\$0
Good F	aith Effo	Number of Number	daily weekly monthly quarterly semiannual annual single event  and fees will be of  Extraordinary Ordinary N/A Notes	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Reduction  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal	\$0
Good F	aith Effo	Number of Number	daily weekly monthly quarterly semiannual annual single event  and fees will be of  Extraordinary Ordinary N/A	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Reduction  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal	\$0
Good F	aith Effo	Number of Number	daily weekly monthly quarterly semiannual annual single event  and fees will be of  Extraordinary Ordinary N/A Notes	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  Statutory Limit Test	\$0
Good F	aith Effo	Number of Number	daily weekly monthly quarterly semiannual annual single event  and fees will be of  Extraordinary Ordinary N/A Notes	Violation Base Penalty  determined by the Financial Administration Division at the next billing cycle.  Reduction  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  Statutory Limit Test	\$0 \$0 \$0

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN H	ILLS DEVELOPMEN	IT CO., INC. (Po	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565	i					
Media Violation No.	Public Water 9	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
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				N/			
Avoided Costs	ANNU	ALIZE avoided c	osts before er			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				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				N/	A		
Approx. Cost of Compliance		\$0			TOTAL		\$0

		ening Date		<b>Docket No.</b> 2021-0274-MLM-E	PCW
	F	Respondent	NORTHERN HIL	LS DEVELOPMENT CO., INC. (PCW 1)	Policy Revision 4 (April 2014)
		Case ID No.		PCW	Revision September 1, 2019
Reg.	Ent. Ref	erence No.	RN101267565		
			Public Water Su	upply	
	Enf. C	coordinator	Carlos Molina		
	Viola	ation Number	3		
		Rule Cite(s)		30 Tex. Admin. Code § 290.42(I)	
				35 15 55 5 25 2(1)	
			Failed to some	oile and maintain a thorough and up-to-date plant operations man	
	Violatio	n Description	railed to comp	for operator review and reference.	udi
				for operator review and reference.	
				Base Pena	<b>s</b> 5,000
_	_				
>> Env	vironme	ntal, Proper	ty and Hum	an Health Matrix	
		Release	Major	<b>Harm</b> Moderate Minor	
OR		Actual		Ploderate Pillioi	
		Potential		Percent 0.0%	
		roteritiai		1 Crecite 0.070	
>>Pro	aramma	tic Matrix			
, ,	<b>J</b>	Falsification	Major	Moderate Minor	
			Х	Percent 5.0%	
			•		
	Matrix		100	0% of the rule requirements were not met.	
	Notes				
				Adjustment \$4,	750
					+250
					\$250
Violatio	on Even	te			\$250
Violatio	on Even	ts			\$250
Violatio	on Even		/iolation Events	1 62 Number of violation days	\$250
Violatio	on Even		/iolation Events	1 62 Number of violation days	\$250
Violatio	on Even		/iolation Events daily	1 62 Number of violation days	\$250
Violatio	on Even			1 62 Number of violation days	\$250
Violatio	on Even		daily	1 62 Number of violation days	
Violatio	on Even		daily weekly	1 62 Number of violation days  Violation Base Pena	
Violatio	on Even		daily weekly monthly		
Violatio	on Even		daily weekly monthly quarterly semiannual annual		
Violatio	on Even		daily weekly monthly quarterly semiannual		
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Pena	
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Pena	
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Pena	
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Pena	
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena X  One single event is recommended.	<b>alty</b> \$250
			daily weekly monthly quarterly semiannual annual single event	Violation Base Pena X  One single event is recommended.	<b>alty</b> \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena  X  One single event is recommended.  Reduct	<b>alty</b> \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena  X  One single event is recommended.  Reduct	<b>alty</b> \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena  X  One single event is recommended.  Reduct	<b>alty</b> \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One single event is recommended.  Reduct  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X	<b>alty</b> \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One single event is recommended.  Reduct  O.0%  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for	<b>alty</b> \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One single event is recommended.  Reduct  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X	<b>alty</b> \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One single event is recommended.  Reduct  O.0%  Refore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for this violation.	alty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One single event is recommended.  Reduct  O.0%  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for	alty \$250
Good F	aith Effe	Number of \	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes	One single event is recommended.  One single event is recommended.  Reduct  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subte	*250 stal \$250
Good F	aith Effe	Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One single event is recommended.  Reduct  Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subte	*250 stal \$250
Good F	aith Effe	Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes	One single event is recommended.  One single event is recommended.  Reduct Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtempton  Statutory Limit Test	*250 stal \$250
Good F	aith Effe	Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes  this violation	One single event is recommended.  One single event is recommended.  Reduct Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtempton  Statutory Limit Test	\$250   \$250

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN H	ILLS DEVELOPMEN	NT CO., INC. (P	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565	i					
Media	Public Water S					Percent Interest	Years of Depreciation
Violation No.	3						•
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Équipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	16-Dec-2020	5-Jan-2022	1.05	\$9	n/a	\$9
Notes for DELAYED costs	operatio	ons manual, calcu	lated from the i	nvestiga	ation date to the e	n a thorough and upstimated date of cor	npliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before ei			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							

Release Major Moderate Minor Actual Potental Percent 0.0%  >>Programmatic Matrix Falsification Major Moderate Minor  Release Major Moderate Minor  Release Major Moderate Minor  Falsification Major Moderate Minor  Release Major Moderate Minor  Percent 5.0%  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly semiannual annual single event x  Semiannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0%  Defore NOE/NOV to EDPRP/Settlement Offer Extraordinary NA X  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250	Reg. Ent. Reference No. 60406 Reg. Ent. Reference No. 81010267555 Media Public Water Supply Enf. Coordinator Carlos Molina Violation Number Rule Cite(s)  Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  >> Environmental, Property and Human Health Matrix Harm OR  Actual Potential    Percent			ening Date			<b>cet No.</b> 2021-0274-MLM-E		PCW
Reg. Ent. Reference No. RN101267565 Media Public Water Supply  Enf. Coordinator Carlos Molina  Violation Number  Rule Cite(s)  Sale Penalty  Violation Description  Violation Description  Violation Description  Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  Sale Penalty  S5,000  Service Admin. Code § 290.45(f)(1)  Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  Should be properly evaluated.  Percent 0.0%  Service Major Moderate Minor Percent 5.0%  Major Moderate Minor Percent 5.0%  Matrix Notes  100% of the rule requirements were not met.  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly week	Reg. Ent. Reference No. RNI01267365 Media Public Water Supply Enf. Coordinator Carlos Molina Violation Number Rule Cite(s)  Related to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Potential Potential North Major Moderate Minor Potential North			•		'ELOPMENT CO., INC. (	(PCW 1)	Policy I	Revision 4 (April 2014)
Media Public Water Supply	Media   Public Water Supply							PCW Revisi	on September 1, 2019
Violation Number   4   30 Tex. Admin. Code § 290.45(f)(1)      Violation Description   5   30 Tex. Admin. Code § 290.45(f)(1)     Violation Description   Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.    Sase Penalty   55,000	Finf. Coordinator Carlos Molins Violation Number Rule Cite(s)  Falled to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  Service pump, or pressure maintenance capacity may be properly evaluated.  Service pump, or pressure maintenance capacity may be properly evaluated.  Percent 0.0%  Service pump, or pressure maintenance capacity may be properly evaluated.  Percent 0.0%  Percent 0.0%  Percent 5.0%  Matrix Roless 100% of the rule requirements were not met.  Adjustment \$4,750  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly 4 4,750  Violation Events  One single event x  One single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0% Recentor to EDRRP/Settlement One Extraordinary Ordinary 100 Respondent does not meet the good faith criteria for this violation.  Violation Subtotal 2508  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount 5104 Violation Final Penalty Total 5578	Reg.	Ent. Ref						
Violation Number Rule Cite(s)  30 Tex. Admin. Code § 290.45(n)(1)  Falled to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  **Serviconmental, Property and Human Health Matrix*    Harm   Release   Major   Moderate   Minor	Violation Number   4								
Violation Description   Falled to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.    Sase Penalty	Saled to maintain a vater purchase contract available for review to the Executive Director in order that production, storage, service gump, or pressure maintenance capacity may be properly evaluated.    Saled to maintain a vater purchase contract available for review to the Executive Director in order that production, storage, service gump, or pressure maintenance capacity may be properly evaluated.    Sale Penalty   \$5,000								
Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.    Sase Penalty	Violation Description  Falied to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  **See Penalty**    Sase Penalty**   \$5,000		Viola						
Violation Description  Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.  **Selease** Major** Moderate** Minor**  OR Actual Potential Percent 0.0%  **Percent 0.0%  **Percent 5.0%  **Notes** 100% of the rule requirements were not met.  **William Events**  Number of Violation Events 1 62 Number of violation days  **Violation Events**  Number of Violation Events 1 5250  **Violation Events**  One single event is recommended.  **Good Faith Efforts to Comply 0.0%  Service Norwork Norwork to EDMP/Sectionent Offer Extraordinary Ordinary NAI X Notes**  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  **Economic Benefit (EB) for this violation**  Statutory Limit Test**	Violation Description   Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.			Rule Cite(s)		30 Tex. Admin. Code	e § 290.45(f)(1)		
Violation Description   Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.    Base Penalty   \$5,000	Violation Description   Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated.    South						- 3 ( ) ( )		
>> Environmental, Property and Human Health Matrix   Harm   Harm	>> Environmental, Property and Human Health Matrix   Actual		Violatio	n Description		production, storage, s	service pump, or pressure mai		
Number of Violation Events	Release Major Moderate Minor Actual Percent 0.0%  >>Programmatic Matrix Falsification Major Moderate Minor  Falsification Major Moderate Minor  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly semiannual annual single event x  One single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0%  Extraordinary 0.0% Falsification Major Moderate Minor  Falsification Major Moderate Minor  Percent 5.0%  Adjustment \$4,750  \$250  \$250  \$250  \$250  \$350  Falsification Events 1 62 Number of violation days  Adjustment of Violation Base Penalty 9.250  \$400  \$400  Falsification Major Moderate Minor  Falsification Major Moderate Minor  Percent 0.0%  Adjustment \$4,750  \$250  \$250  \$400  Falsification Major Moderate Minor  Falsification Major Moderate Minor  Percent 0.0%  Adjustment \$4,750  \$250  \$400  Falsification Major Moderate Minor  Falsification Major Moderate Minor  Percent 0.0%  Adjustment \$4,750  \$250  \$250  Falsification Major Moderate Minor  Falsification Moderate Mi						Bas	e Penalty	\$5,000
Release Major Moderate Minor Actual Potential Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Falsification Major Moderate Minor Falsification Major Moderate Minor  Falsification Major Moderate Minor  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterity weekly monthly geniannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 6-0-0% Defore NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary NA X  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$250	Release Major Moderate Minor Actual Potential Percent 0.0%  >>Programmatic Matrix Falsification Major Moderate Minor Falsification Najor Minor Fal	>> Env	vironme	ntal, Proper	ty and Human He	ealth Matrix			
OR Actual Potential Percent 0.0%  >>Programmatic Matrix Falsification Major Moderate Minor Percent 5.0%  Matrix Notes 100% of the rule requirements were not met.  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly semiannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0% DEPROY to EDPROY Settlement Offer Extraordinary Ordinary NA X  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	OR			D.1					
>>Programmatic Matrix Falsification Major Moderate Minor Falsification X Percent 5.0%  Matrix Notes  100% of the rule requirements were not met.  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly 4 quarterly 4 violation Base Penalty \$250  Sefore NGE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A X Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	Potential Major Moderate Minor Falsification Major Moderate Minor Falsification Notes Notes 100% of the rule requirements were not met.    Matrix Notes   100% of the rule requirements were not met.   \$4,750	OΡ				erate Minor			
>>Programmatic Matrix Falsification Major Moderate Minor Whotes 100% of the rule requirements were not met.    Matrix Notes   100% of the rule requirements were not met.	>>Programmatic Matrix Falsification Major Moderate Minor Matrix Notes  100% of the rule requirements were not met.  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events  Number of Violation Events  One single event is recommended.  One single event is recommended.  Good Faith Efforts to Comply One Substitution annual annual single event is recommended.  Fatraordinary Ordinary NoE/NOV to EDPREYSettlement Offer Extraordinary Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$258	OK					Percent 0.00%		
Falsification Major Moderate Minor    Percent   5.0%	Falsification Major Moderate Minor    Matrix   Notes   100% of the rule requirements were not met.			Potential			<b>Percent</b> 0.0%		
Falsification Major Moderate Minor    Matrix Notes	Falsification Major Moderate Minor    Matrix   Notes   100% of the rule requirements were not met.	>>Pro	gramma	tic Matrix					
Matrix Notes    Matrix Notes   100% of the rule requirements were not met.	Matrix Notes    Matrix Notes   100% of the rule requirements were not met.	,,,,,,	gramma		Major Mode	erate Minor			
Notes  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly semiannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly Semiannual annual single event is recommended.  One single event is recommended.  Good Faith Efforts to Comply 0.0% NoE/NOV NoE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A X  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$578						Percent 5.0%		
Notes  Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly semiannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	Adjustment \$4,750  \$250  Violation Events  Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly Semiannual annual single event is recommended.  One single event is recommended.  Good Faith Efforts to Comply 0.0% NoE/NOV NoE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A X  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$578								
Violation Events  Number of Violation Events	Violation Events  Number of Violation Events				100% of t	ne rule requirements w	vere not met.		
Violation Events  Number of Violation Events	Violation Events  Number of Violation Events								
Violation Events  Number of Violation Events	Violation Events  Number of Violation Events						Adjustment	¢4.7E0	
Number of Violation Events    Violation Events	Violation Events    Number of Violation Events						Aujustilielit	\$4,730	
Adaily weekly monthly quarterly semiannual annual single event is recommended.    Concessingle event is recommended   Concession	Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly semiannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0% Sefore NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578								\$250
Adaily weekly monthly quarterly semiannual annual single event is recommended.    Concessingle event is recommended   Concession	Number of Violation Events 1 62 Number of violation days  daily weekly monthly quarterly semiannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0% Sefore NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578								·
daily   weekly   monthly   quarterly   semiannual   annual   single event   x      One single event is recommended.	daily weekly monthly quarterly semiannual annual single event is recommended.    One single event is recommended.   \$250	Violatio	on Event	ts					
daily   weekly   monthly   quarterly   semiannual   annual   single event   x      One single event is recommended.	daily weekly monthly quarterly semiannual annual single event is recommended.    One single event is recommended.   \$250			Ni la 6 N	Calabia a Francis		North and State Halland	da	
weekly monthly quarterly semiannual annual single event x  One single event is recommended.  One single event of semianterly semiannual annual single event of semiannual single event	weekly monthly quarterly semiannual annual single event   x   Violation Base Penalty   \$250      One single event   x   Violation Base Penalty   \$250			Number of \	/iolation Events		Number of violation	days	
weekly monthly quarterly semiannual annual single event x  One single event is recommended.  One single event of semianterly semiannual annual single event of semiannual single event of sem	weekly monthly quarterly semiannual annual single event   x   Violation Base Penalty   \$250      One single event   x   Violation Base Penalty   \$250				daily				
monthly quarterly semiannual annual single event   x   Statutory Limit Test   Statutory Lim	Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$250  \$40  \$578  \$578								
quarterly semiannual annual single event	Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$250  \$250  \$250  \$250  \$250  \$250  \$250  \$250  \$250  \$250  \$250  \$250				,				
Semiannual annual single event   x    One single event is recommended.  Good Faith Efforts to Comply   0.0%   Reduction   \$0  Before NOE/NOV   NOE/NOV to EDPRP/Settlement Offer   Extraordinary   Ordinary   N/A   x    Notes   The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal   \$250  Economic Benefit (EB) for this violation   Statutory Limit Test	Semiannual annual single event x  One single event is recommended.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578						Violation Bas	e Penalty	\$250
Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation  Statutory Limit Test	Good Faith Efforts to Comply 0.0% Reduction \$0  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x  Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578							_	7-22
One single event is recommended.  Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation	One single event is recommended.  Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$104 Violation Final Penalty Total \$578				annual				
Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary  Ordinary  N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$250  Economic Benefit (EB) for this violation	Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary N/A x Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$104  Violation Final Penalty Total \$578				single event	(			
Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary  Ordinary  N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$250  Economic Benefit (EB) for this violation	Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary N/A x Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$104  Violation Final Penalty Total \$578					<u> </u>			
Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary  Ordinary  N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$250  Economic Benefit (EB) for this violation	Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary N/A x Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation \$104  Violation Final Penalty Total \$578								
Extraordinary Ordinary N/A Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$104 Violation Final Penalty Total \$578				One	single event is recomm	nended.		
Extraordinary Ordinary N/A Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$104 Violation Final Penalty Total \$578								
Extraordinary Ordinary N/A Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$104 Violation Final Penalty Total \$578	Good F	aith Fff	orts to Com	nlv	0.0%		Peduction	\$0
Extraordinary Ordinary N/A Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation  Statutory Limit Test	Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$104 Violation Final Penalty Total \$578	doou i	aicii Liiv	orts to com				Reduction	Ψ°
N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578								
N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578				Ordinary				
Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578								
Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test	Violation Subtotal \$250  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$104 Violation Final Penalty Total \$578								
Economic Benefit (EB) for this violation Statutory Limit Test	Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$104  Violation Final Penalty Total \$578				Notes The Ro				
	Estimated EB Amount \$104 Violation Final Penalty Total \$578						Violation	Subtotal	\$250
	Estimated EB Amount \$104 Violation Final Penalty Total \$578	Fconor	nic Rene	ofit (FR) for	this violation		Statutory Limit	Test	
Estimated EB Amount \$104 Violation Final Penalty Total \$578		LCOHOL	THE DELLE	(LD) 101	tilis viviativii		Statutory Liffill	1631	
	This violation Final Assessed Penalty (adjusted for limits) \$578			Estimate	ed EB Amount	\$104	Violation Final Pen	alty Total	\$578
This violation Final Assessed Bonalty (adjusted for limits) 4579	This violation Final Assessed Penalty (adjusted for limits) \$5/8							_	
11115 VIOIALION FINAL ASSESSED PENALTY (AUJUSTED TOF HITHIES) \$57.8					TL	vic violation Final Ac	coccod Donalty (adjusted f	or limital	<b>₫</b> Ε70

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN HI	ILLS DEVELOPMEN	NT CO., INC. (Po	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565	i					
Media	Public Water S					Percent Interest	Years of
Violation No.	4						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	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)	\$1,500	16-Dec-2020	5-May-2022	1.38	\$104	n/a	\$104
Notes for DELAYED costs	,	inves	tigation date to	the est	imated date of cor	•	
Avoided Costs	ANNU	ALIZE avoided c	osts before er			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		\$1,500			TOTAL		\$104

	Scre	ening Date	16-Feb-2021		Do	cket No.	2021-0274-MLM-E		PCW
			NORTHERN HILL	S DEVELOPM	ENT CO., IN	C. (PCW 1)		Policy	Revision 4 (April 2014)
_		Case ID No.						PCW Revis	sion September 1, 2019
Reg.	Ent. Rei		RN101267565						
	Enf (		Public Water Sup	pply					
		Coordinator ation Number							
	VIOI			C-4- 5 200	4C(E)(D) (E)	(2)/4)/::)/!!!	(6)(2)(4)(:::) (6)	(2)(D)(::)	
		Rule Cite(s)			(3)(E)(ii), (f)		), (f)(3)(A)(iii), (f)( f)(3)(E)(iv), (f)(3)(		
	Violatio	n Description	them readi Specifically, the each week, the complaints receinvestigation, microbiological a results of chem relating to san any Sample S	ly available for the Facility did to the Facility did to the education of the copies of any analyses, Confical analyses, hitary surveys iting Plans and	or review by not have recon, and nature system and public notice sumer Configure any written, copies of the monitoring of the confiction o	the Executive cords of the care of water the results of the care state of the care t	tenance records at e Director upon rec amount of water di quality, pressure, of f any subsequent of the water system, of t compliance docum mmaries, or common Service Inspection records relating to on-site for review.	quest. stributed or outage complaint results of mentation, unications i reports,	
								se Penalty	\$5,000
>> Env	vironme	ntal, Prope	rty and Huma	n Health I	Matrix				
		_	_	Harm				•	
OR		Release	Major	Moderate	Minor				
UK		Actual Potential					Percent 0.0%	1	
		rotential					0.070	1	
>>Prog	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor			-	
				Х			Percent 2.5%		
	Matrix Notes		Between 30%	and 70% of	the rule req	uirements w	ere not met.		
						Adjı	ustment	\$4,875	
								I	\$125
Violatio	on Even	ts							
		Number of \	/iolation Events	1		62	Number of violation	n days	
			_		Ц	<u> </u>		,	
			daily						
			weekly						
			monthly				Violation Pag	o Donaltu	¢125
			quarterly semiannual				Violation Bas	se Penaity	\$125
			annual						
			single event	х					
				One single e	vent is recor	nmended.			
Good F	aith Effo	orts to Com	ply	0.0%				Reduction	\$0
			Ве	fore NOE/NOV	NOE/NOV to ED	PRP/Settlement	Offer		
			Extraordinary						
			Ordinary						
			N/A	х				1	
				The Responde	nt does not	meet the ao	od faith criteria for		
			Notes	·		violation.			
			Notes	<u> </u>				n Subtotal	\$125
Econon	nic Bene	efit (EB) for	Notes			violation.	Violation		\$125
Econon	nic Bene	• •	this violation		this	violation.	Violation Statutory Limi	t Test	
Econon	mic Bene	• •	Notes			violation.	Violation	t Test	\$125 \$289

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN HI	LLS DEVELOPMEN	NT CO., INC. (Po	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565						
Media Violation No.	Public Water S	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	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	\$120	16-Dec-2020	5-Dec-2021	0.97	\$6	n/a	\$6
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	records and	d make them imm calculated fro	nediately availat om investigation	ole for in date to	nspection upon req the estimated date	<u> </u>	ive Director,
Avoided Costs	ANNU	ALIZE avoided o	osts before er			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		\$120			TOTAL		\$6

		ening Date		<b>Docket No.</b> 2021-0274-MLM-E	PCW
	F	espondent	NORTHERN HIL	LS DEVELOPMENT CO., INC. (PCW 1)	olicy Revision 4 (April 2014)
		ase ID No.		PCW F	Revision September 1, 2019
Reg.	Ent. Ref	erence No.	RN101267565		
			Public Water St	upply	
	Enf. C	coordinator	Carlos Molina		
	Viola	ation Number	6		
		Rule Cite(s)		30 Tex. Admin. Code § 290.46(z)	
				20 10/11/14/11/11 2040 3 230110(2)	
			Failed to sussi		
	Violatio	n Description	ralled to creat	e a nitrification action plan for all systems distributing chloraminate water.	eu
				water.	
				Base Penal	lty \$5,000
>> Env	vironme	ntal, Proper	ty and Hum	an Health Matrix Harm	
		Release	Major	Moderate Minor	
OR		Actual		Thousand Things	
0		Potential		Percent 0.0%	
				0.000	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
			Х	Percent 5.0%	
	Makuiss				
	Matrix Notes		100	0% of the rule requirements were not met.	
	Notes				
				Adjustment \$4,7	50
					¢250
					\$250
Violatio	on Even	ts			\$250
Violatio	on Even	ts			\$250
Violatio	on Even		/iolation Events	1 62 Number of violation days	\$250
Violatio	on Even		/iolation Events	1 62 Number of violation days	\$250
Violatio	on Even		daily	1 62 Number of violation days	\$250
Violatio	on Even		daily weekly	1 62 Number of violation days	\$250
Violatio	on Even		daily weekly monthly		
Violatio	on Even		daily weekly monthly quarterly	1 62 Number of violation days  Violation Base Penal	
Violatio	on Even		daily weekly monthly quarterly semiannual		
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Penal	
Violatio	on Even		daily weekly monthly quarterly semiannual		
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Penal	
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Penal	
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Penal	
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Penal	
			daily weekly monthly quarterly semiannual annual single event	Violation Base Penal  x  One single event is recommended.  Reduction	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penal  x  One single event is recommended.	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penal  x  One single event is recommended.  Reduction	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penal  x  One single event is recommended.  Reduction	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penal  x  One single event is recommended.  Reduction	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One Single event is recommended.  Reductions and the state of	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penal  X  One single event is recommended.  Reduction Base Penal  NOE/NOV to EDPRP/Settlement Offer	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One Single event is recommended.  Reductions and the state of	lty \$250
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One single event is recommended.  Reduction of the state of th	s \$250 on \$0
		Number of \	daily weekly monthly quarterly semiannual annual single event	One single event is recommended.  One Single event is recommended.  Reductions and the state of	s \$250 on \$0
Good F	aith Effe	Number of \	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes	One single event is recommended.  One single event is recommended.  Reductions and the specific property of the specific	s \$250 on \$0
Good F	aith Effe	Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes  this violation	One single event is recommended.  One single event is recommended.  Reduction  Reduction  Reduction  Reduction  Reduction  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtoon  Statutory Limit Test	septible 1 septible 1 septible 1 septible 1 septible 1 septible 2 septible 1
Good F	aith Effe	Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes	One single event is recommended.  One single event is recommended.  Reductions and the specific property of the specific	septible 1 septible 1 septible 1 septible 1 septible 1 septible 2 septible 1
Good F	aith Effe	Number of \ orts to Com	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes  this violation	One single event is recommended.  One single event is recommended.  Reduction  Reduction  Reduction  Reduction  Reduction  X  The Respondent does not meet the good faith criteria for this violation.  Violation Subtoon  Statutory Limit Test	ty   \$250   son   \$0   tal   \$250   tal   \$578

	E	conomic	Benefit	Wo	rksheet		
		LLS DEVELOPMEN	NT CO., INC. (PO	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565						
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	6					r creent interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	16-Dec-2020	5-Dec-2021	0.97	\$9	n/a	\$9
Notes for DELAYED costs	,	inves	tigation date to	the est	imated date of cor	<u> </u>	
Avoided Costs	ANNU	ALIZE avoided c	osts before er			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
				0.00	1 \$0	\$0	\$0

		ening Date		<b>Docket No.</b> 2021-0274-MLM-E	PCW
	F	Respondent	NORTHERN HIL	LS DEVELOPMENT CO., INC. (PCW 1)  Policy	Revision 4 (April 2014)
		Case ID No.		PCW Rev	ision September 1, 2019
Reg.	Ent. Ref	erence No.	RN101267565		
			Public Water Su	pply	
	Enf. C	coordinator	Carlos Molina		
	Viola	ation Number	7		
		Rule Cite(s)		30 Tex. Admin. Code § 290.46(I)	
				55 - 500 - 50	
	Violatio	n Description	F	Failed to flush all dead-end mains at monthly intervals.	
		ı			4
				Base Penalty	\$5,000
>> En:	vironmo	ntal Proper	ty and Hum	an Health Matrix	
Liii		iitai, Fiopei	ty and main	Harm	
		Release	Major	Moderate Minor	
OR		Actual			
		Potential		x Percent 5.0%	
		· ·			
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
					1
	Matrix	Failure to flush	n dead-end mair	ns at monthly intervals could expose persons served by the Facility to	
	Notes			minants which would not exceed levels protective of human health.	
				Adjustment \$4,750	1
				Adjustificite \$41,750	<u>.</u>
					\$250
	_				
Violatio	on Event	ts			
		Number of \	/iolation Events	1 62 Number of violation days	
		Number of v	iolation Events	Number of violation days	
			daily		
			weekly		
			monthly		
			quarterly	X Violation Base Penalty	\$250
			semiannual	•	
			annual		
			single event		
		One quarterly	event is recomn	nended, calculated from the December 16, 2020 investigation date to	
		one quarenty		the February 16, 2021 screening date.	
Good F	aith Eff	orts to Com	nlv	0.0% Reduction	\$0
				efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary		
			N/A	X	
			ĺ		
			Notes	The Respondent does not meet the good faith criteria for	
				this violation.	
			Ŀ		
				Violation Subtotal	\$250
Econor	nic Bene	efit (EB) for	this violation	on Statutory Limit Test	
			_		
		Estimate	ed EB Amount	\$6 Violation Final Penalty Total	\$578
				This violation Final Assessed Penalty (adjusted for limits)	\$578

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN HI	LLS DEVELOPMEN	NT CO., INC. (PO	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565						
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	7					Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	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	16-Dec-2020	5-Mar-2022	1.22	\$6	n/a	\$6
Notes for DELAYED costs	,	inves	tigation date to	the est	imated date of cor	•	
Avoided Costs	ANNU	ALIZE avoided c	osts before er			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	\$0
				0.00	\$0		
ONE-TIME avoided costs							\$0
ONE-TIME avoided costs Other (as needed)				0.00	\$0	\$0	\$0 \$0

		ening Date			<b>No.</b> 2021-0274-MLM-E		PCW
		•	NORTHERN HILLS DEVELOP	PMENT CO., INC. (PCV	N 1)	Policy Re	evision 4 (April 2014)
_		ase ID No.				PCW Revision	n September 1, 2019
Reg.	Ent. Ref	erence No.					
	F.,. 6		Public Water Supply				
		Coordinator ation Number					
	VIOI	Rule Cite(s)					
		Rule Cite(s)	30 Te	x. Admin. Code § 290	0.110(c)(4)(A)		
	Violatio	n Description	Failed to monitor the disinfe			ghout the	
			distribution	system at least once	e every seven days.		
					Base	Penalty	\$5,000
> = Em		ntal Dramar	tream director Haalth	. Makeiy			
>> En	vironme	ntai, Proper	ty and Human Health Harm	1 матгіх			
		Release	Major Moderate	Minor			
OR		Actual					
		Potential	Х		Percent 15.0%		
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor			
		Faisification	Major Moderate	MILIOI	Percent 0.0%		
					0.0 70		
		Failure to mo	nitor the disinfectant residua	al at representative lo	ocations throughout the dis	tribution	
	Matrix		t once every seven days cou	•	_		
	Notes		which would exceed	levels protective of h	numan health.		
		<u> </u>					
					Adjustment	\$4,250	
							\$750
							\$730
Violati	on Event	ts					
				_			
		Number of \	/iolation Events 2	62	Number of violation of	days	
			daily	¬			
			daily weekly	-			
			monthly x	-			
			quarterly	=	Violation Base	Penalty	\$1,500
			semiannual				. ,
			annual				
			single event				
		Two monthly	events are recommended, ca	alculated from the De	cember 16, 2020 investiga	ition date	
			to the Februa	ry 16, 2021 screening	g date.		
				_			
Good F	aith Effo	orts to Com			į	Reduction	\$0
			Before NOE/NOV	/ NOE/NOV to EDPRP/Set	ttlement Offer		
			Extraordinary				
			Ordinary				
			N/A x				
			The Respon	dent does not meet t	the good faith criteria for		
			Notes	this violation			
					Violation	Subtotal	\$1,500
Facus	mie Per	SIL (ED) S	this vislation		Chahutama I imit	Toot	
conoi	mic Rene	ent (EB) for	this violation		Statutory Limit	rest	
		Estimate	ed EB Amount	\$10	Violation Final Pena	ilty Total	\$3,470
				-11 Ft. 1 *	and Brownian C. U. a. 1.5		+2.470
			This vi	olation Final Assess	sed Penalty (adjusted fo	or limits)	\$3,470

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN HI	LLS DEVELOPMEN	NT CO., INC. (PO	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565						
Media	Public Water S					Percent Interest	Years of
Violation No.	8						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		•					
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0 \$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				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)	\$10	16-Dec-2020	5-Dec-2021	0.97	\$0	n/a	\$0
Notes for DELAYED costs	seven days	(\$10 per week), o	calculated from	the inve	stigation date to t	ctant residual at lea he estimated date o	f compliance.
Avoided Costs	ANNU	ALIZE avoided o	osts before er			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				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs	\$10	16-Dec-2020	16-Feb-2021	0.17	\$0	\$10	\$10
Other (as needed)  Notes for AVOIDED costs						\$0 ctant residual at lea ate to the screening	,
Approx. Cost of Compliance		\$20			TOTAL		\$10

		ening Date			<b>0.</b> 2021-0274-MLM-E	PCW
		•	NORTHERN HILLS DEVELOP	MENT CO., INC. (PCW	1)	Policy Revision 4 (April 2014)
_		Case ID No.				PCW Revision September 1, 2019
Reg.	Ent. Ref	ference No.				
			Public Water Supply			
		coordinator				
	Viola	ation Number Rule Cite(s)				
		Rule Cite(s)	30	Tex. Admin. Code § 2	90.46(i)	
			Failed to adopt an adequate	nlumbing ordinance	rogulations or comico a	graamant
	Violatio	n Description	Failed to adopt an adequate with provisions for proper er			
	Violatio	Description		ptable plumbing practi		
					·	
					Base	e Penalty \$5,000
<b>.</b>	<b>.</b>		d 11 11 lab	B4 - 4		
>> En	vironme	ntai, Propei	ty and Human Health Harm	Matrix		
		Release	Major Moderate	Minor		
OR		Actual				
		Potential			Percent 0.0%	
_				•		
>>Pro	gramma	tic Matrix Falsification	Major Madarata	Minor		
		Faisincation	Major Moderate	MILIOI	Percent 5.0%	
			^		3.0 70	
	Matrix		100% of the rule	e requirements were n	ot met.	
	Notes			•		
		J <del>-</del>				
					Adjustment	\$4,750
						\$250
						Ψ230
Violati	on Event	ts				
		Ni la 6 N	Calabian Franks		North and Carlotter	davia
		Number of V	/iolation Events 1	62	Number of violation	aays
			daily	1		
			weekly			
			monthly			
			quarterly		<b>Violation Base</b>	Penalty \$250
			semiannual			
			annual			
			single event x			
			One single	event is recommended	d.	
Cardi	:+L F££.	Co		1		φ.
Good	raith Eff	orts to Com	ply 0.0%  Before NOE/NOV			Reduction \$0
			Extraordinary	NOL/NOV to EDITAT/Settle	The original states and the states are states as the states are states are states are states as the states are s	
			Ordinary			
			N/A x			
			Notes The Respond	lent does not meet the this violation	e good faith criteria for	
				this violation		
					Violetie:	Subtatal #350
					Violation	Subtotal \$250
Econo	mic Bene	efit (EB) for	this violation		Statutory Limit	Test
		Fetimate	ed FR Amount	\$1 <b>0</b>	Violation Final Don	alty Total ¢578
		Estimate	ed EB Amount	\$10	Violation Final Pena	alty Total \$578
		Estimate			Violation Final Penald Penalty (adjusted for	-

		COHOHHIC	Benefit	WO	rksheet		
		LLS DEVELOPMEN	NT CO., INC. (PO	CW 1)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565						
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	9					Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	16-Dec-2020	5-Feb-2022	1.14	\$10	n/a	\$10
Notes for DELAYED costs	service	agreement, calcu	lated from the i	nvestiga	ation date to the e	olumbing ordinance, stimated date of cor	npliance.
Avoided Costs	service	agreement, calcu	lated from the i	nvestiga itering	ation date to the e	stimated date of cor	mpliance. d costs)
Avoided Costs Disposal	service	agreement, calcu	lated from the i	nvestiga itering 0.00	item (except for	stimated date of cor r one-time avoided \$0	mpliance. d costs) \$0
Avoided Costs Disposal Personnel	service	agreement, calcu	lated from the i	tering 0.00 0.00	item (except for \$0 \$0	stimated date of cor	mpliance. d costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	service	agreement, calcu	lated from the i	1tering 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0	stimated date of cor	mpliance.  d costs)  \$0  \$0  \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	service	agreement, calcu	lated from the i	tering 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0	stimated date of corrections of corr	mpliance.  d costs)  \$0  \$0  \$0  \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	service	agreement, calcu	lated from the i	tering 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	stimated date of corrections of corrections avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	**************************************
Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment	service	agreement, calcu	lated from the i	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	stimated date of correctime avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	s0   s0   s0   s0   s0   s0   s0   s0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	service	agreement, calcu	lated from the i	tering 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	stimated date of corrections of corrections avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	**************************************
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	service	agreement, calcu	lated from the i	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	stimated date of correctime avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tosts

Respondent Case ID No. Reg. Ent. Reference No.	16-Feb-2021	<b>Docket No.</b> 2021-0274-MLM-E	PCW
	NORTHERN HILLS DEVELOPMENT (	CO., INC. (PCW 1)	Policy Revision 4 (April 2014)
Dea Ent Deterence No			PCW Revision September 1, 2019
	Public Water Supply		
Enf. Coordinator Violation Number	Carlos Molina		
Rule Cite(s)			
Rule Cite(s)	30 Tex. Adı	nin. Code § 290.110(c)(5)	
Violation Description		iveness sampling to ensure that mono	
	is the prevailing chloramine	species and that nitrification is control	led.
		Bas	se Penalty \$5,000
>> Environmental, Proper	ty and Human Health Mati	ix	
	Harm		
Release	Major Moderate Mi	nor	
OR Actual		<b>D</b>	1
Potential		Percent 3.0%	I
>>Programmatic Matrix			
Falsification	Major Moderate Mi	nor	
		Percent 0.0%	
Matrix Failure to co	nduct chloramine effectiveness sam	pling could lead to nitrification in the di	<mark>stribution</mark>
Notes System	·	by the Facility to an insignificant amou	nt of
	ontaminants which would not excee	d levels protective of human health.	
		Adjustment	\$4,850
		Aujustillelit	\$ <del>4</del> ,030
			\$150
<b>Violation Events</b>			
Violation Lvents			
	iolation Events 1	62 Number of violation	days
	iolation Events 1	62 Number of violation	days
	riolation Events 1	62 Number of violation	days
	daily daily weekly	62 Number of violation	days
	daily weekly monthly		<u></u>
	daily weekly monthly quarterly	62 Number of violation  Violation Base	<u></u>
	daily weekly monthly quarterly semiannual		<u></u>
	daily weekly monthly quarterly		<u></u>
	daily weekly monthly quarterly semiannual annual		
	daily weekly monthly quarterly semiannual annual single event	Violation Bas	<u></u>
	daily weekly monthly quarterly semiannual annual	Violation Bas	<u></u>
	daily weekly monthly quarterly semiannual annual single event	Violation Bas	<u></u>
Number of V	daily weekly monthly quarterly semiannual annual single event  One single event	Violation Bas	se Penalty \$150
	daily weekly monthly quarterly semiannual annual single event   One single event    One single event   Before NOE/NOV  NOE/N	Violation Bas	se Penalty \$150
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event    One single event	Violation Bas is recommended.	se Penalty \$150
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event    One single event   Before NOE/NOV  NOE/N	Violation Bas is recommended.	se Penalty \$150
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event    One single event	Violation Bas is recommended.	se Penalty \$150
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event    One single event    Semiannual Annual Single event    One single event     One single event	Violation Basis recommended.  OV to EDPRP/Settlement Offer	se Penalty \$150
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event    One single event	Violation Bas is recommended.	se Penalty \$150
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event    One single event    Semiannual Annual Single event    One single event     One single event	Violation Bases is recommended.  OV to EDPRP/Settlement Offer sets not meet the good faith criteria for	se Penalty \$150
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event    One single event    Semiannual Annual Single event    One single event     One single event	is recommended.  OV to EDPRP/Settlement Offer  Des not meet the good faith criteria for this violation.	se Penalty \$150
Good Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event   One single event     One single event    One single event	Violation Bases is recommended.  OV to EDPRP/Settlement Offer set not meet the good faith criteria for this violation.  Violation	Reduction \$0
Number of V	daily weekly monthly quarterly semiannual annual single event   One single event     One single event    One single event	is recommended.  OV to EDPRP/Settlement Offer  Des not meet the good faith criteria for this violation.	Reduction \$0
Good Faith Efforts to Com  Economic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event   One single event     One single event    One single event	Violation Bases is recommended.  OV to EDPRP/Settlement Offer set not meet the good faith criteria for this violation.  Violation	Reduction \$0  Subtotal \$150
Good Faith Efforts to Com  Economic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event x  One single event x  One single event x  Notes The Respondent do this violation  ed EB Amount	Violation Bases is recommended.  OV to EDPRP/Settlement Offer ses not meet the good faith criteria for this violation.  Violation Statutory Limi	Reduction \$0  Subtotal \$150  t Test  alty Total \$347

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN HI	LLS DEVELOPMEN	IT CO., INC. (PO	W 1)			
Case ID No.			,	,			
Reg. Ent. Reference No.							
	Public Water S						Years of
		ырріу				<b>Percent Interest</b>	Depreciation
Violation No.	10						
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
200m 200m parem							
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	16-Dec-2020	5-Dec-2021	0.97	\$5	n/a	\$5
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	monochloram	ine is the prevailin inves	ng chloramine s tigation date to	ecies a	and that nitrificatio imated date of cor	·	ulated from the
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance	1100	16.0	16 5 1 2021	0.00	\$0	\$0	\$0
ONE-TIME avoided costs	\$100	16-Dec-2020	16-Feb-2021	0.17	\$1	\$100	\$101
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs			ng chloramine s	oecies a		fectiveness samples n is controlled, calcu e.	
Approx. Cost of Compliance		\$200			TOTAL		\$106

		ening Date			<b>No.</b> 2021-0274-MLM-E	PCW
		•	NORTHERN HILLS DEVELOPM	IENT CO., INC. (PCV	N 1)	Policy Revision 4 (April 2014)
_		Case ID No.				PCW Revision September 1, 2019
Reg.	Ent. Ref	erence No.				
			Public Water Supply			
		coordinator				
	Viola	ation Number Rule Cite(s)				
		Rule Cite(s)	30 Te	ex. Admin. Code § 2	290.46(n)(2)	
	Violatio	n Description	Failed to make available an a			
			so that valves and m	nains can be easily l	ocated during emergencies	•
					Base	Penalty \$5,000
> = E=		ntal Drange	durand Urranan Haalda	Matrix		
>> EN	vironme	ntai, Propei	ty and Human Health Harm	матгіх		
		Release	Major Moderate	Minor		
OR		Actual				
		Potential			Percent 0.0%	
		A				
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor		
		Taisincation	Major Moderate	MINO	Percent 5.0%	
			~		3.0 70	
	Matrix		100% of the rule	requirements were	not met.	
	Notes					
		,				
					Adjustment	\$4,750
						\$250
						7=33
Violati	on Event	ts				
		Number of \	/iolotion Events 1	62	Number of violeties of	love
		Number of v	/iolation Events 1	62	Number of violation of	lays
			daily			
			weekly			
			monthly			
			quarterly		Violation Base	Penalty \$250
			semiannual			
			annual			
			single event x			
			One single	event is recommend	ded.	
Cood	raith Eff	auto to Com	mls. 0.00/		-	Reduction \$0
Good	raiui Eiic	orts to Com		NOE/NOV to EDPRP/Set		Reduction \$0
			Extraordinary			
			Ordinary			
			N/A x			
			The Respond	ant door not most t	the good faith criteria for	
			Notes Notes	this violation		
					o	
					Violation	Subtotal \$250
						<u> </u>
Econo	mic Bene	efit (EB) for	this violation		Statutory Limit	Test
		Estimate	ed EB Amount	\$9	Violation Final Pena	Ity Total \$578
			This vio	lation Final Asses	sed Penalty (adjusted fo	or limits) \$578

	<b>-</b>	conomic	Deneni	AAOI	rksneet		
		ILLS DEVELOPMEN	NT CO., INC. (PO	CW 1)			
Case ID No.							
Reg. Ent. Reference No.	RN101267565	i					
	Public Water S	Supply				Percent Interest	Years of
Violation No.	11						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
200 2 200 p							
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
Remediation/Disposal Permit Costs				0.00	\$0	n/a	\$0
Remediation/Disposal	\$180	16-Dec-2020	5-Dec-2021				
Remediation/Disposal Permit Costs				0.00	\$0 \$9	n/a	\$0 \$9
Remediation/Disposal Permit Costs	The delayed	cost includes the	estimated amou	0.00 0.97 nt to m	\$0 \$9 ake available an a	n/a n/a	\$0 \$9 ate map of the
Remediation/Disposal Permit Costs Other (as needed)	The delayed	cost includes the eastern so that valv	estimated amou ves and mains ca	0.00 0.97 nt to m an be ea	\$0 \$9 ake available an a	n/a n/a ccurate and up-to-d g emergencies, calc	\$0 \$9 ate map of the
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	The delayed distribution sy	cost includes the eastern so that valves	estimated amou ves and mains catigation date to	0.00 0.97 Int to mean be ear the est	\$0 \$9 ake available an a asily located during imated date of cor	n/a n/a ccurate and up-to-d g emergencies, calc npliance.	\$0 \$9 ate map of the ulated from the
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs  Avoided Costs	The delayed distribution sy	cost includes the eastern so that valves	estimated amou ves and mains catigation date to	0.00 0.97 Int to mean be ear the est	\$0 \$9 ake available an a asily located during imated date of cor item (except for	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance. r one-time avoide	\$0 \$9 ate map of the ulated from the
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 Int to mean be ear the est tering 0.00	\$0 \$9 ake available an arasily located during imated date of cor item (except for \$0	n/a n/a n/a ccurate and up-to-d g emergencies, calci npliance. r one-time avoide	\$0 \$9 ate map of the ulated from the d costs)
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est ntering 0.00 0.00	\$0 \$9 ake available an acasily located during imated date of coritem (except for \$0 \$0 \$0	n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0	\$0 \$9 late map of the ulated from the d costs) \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel Inspection/Reporting/Sampling	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est ntering 0.00 0.00 0.00	\$0 \$9 ake available an a asily located during imated date of cor item (except for \$0 \$0 \$0	n/a n/a  ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the d costs) \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est ntering 0.00 0.00 0.00	\$0 \$9 ake available an all asily located during imated date of correct tem (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the d costs) \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est ntering 0.00 0.00 0.00	\$0 \$9 ake available an a asily located during imated date of cor item (except for \$0 \$0 \$0 \$0	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	s0 \$9 ate map of the ulated from the s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est tering 0.00 0.00 0.00	\$0 \$9 ake available an all asily located during imated date of correct tem (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance. r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the d costs) \$0 \$0 \$0
Remediation/Disposal 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 distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est tering 0.00 0.00 0.00 0.00	\$0 \$9 ake available an arasily located during imated date of coritem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est tering 0.00 0.00 0.00 0.00	\$0 \$9 ake available an arasily located during imated date of coritem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal 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 distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est tering 0.00 0.00 0.00 0.00	\$0 \$9 ake available an arasily located during imated date of coritem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delayed distribution sy	cost includes the existent so that valves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est tering 0.00 0.00 0.00 0.00	\$0 \$9 ake available an arasily located during imated date of coritem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delayed distribution sy	cost includes the e estem so that valv inves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est tering 0.00 0.00 0.00 0.00	\$0 \$9 ake available an arasily located during imated date of coritem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	The delayed distribution sy	cost includes the e estem so that valv inves	estimated amou ves and mains catigation date to	0.00 0.97 nt to m an be ea the est tering 0.00 0.00 0.00 0.00	\$0 \$9 ake available an arasily located during imated date of coritem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	n/a n/a n/a ccurate and up-to-d g emergencies, calc npliance.  r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$9 ate map of the ulated from the \$0 \$0 \$0 \$0 \$0 \$0



# Penalty Calculation Worksheet (PCW)

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

DATES

**PAYABLE PENALTY** 

Assigned 8-Feb-2021

	PCW	16-Mar-2	2021	Screening	16-Feb-202	1 EPA Du	e		
RESPO	NDENT/FACILI								
_				DEVELOPI	MENT CO., INC	C. (PCW 2)			
	g. Ent. Ref. No.			I.		Na - 2	/M:	- M:	
Facili	ty/Site Region	4-Dallas/F	ort wort	n		Мајо	/Minor Source	e Minor	
CASE I	NFORMATION								
En	f./Case ID No.	60406				N-	o. of Violation	ıs <mark>1</mark>	
	Docket No.						Order Typ		
Med	dia Program(s)						ent/Non-Prof		
	Multi-Media	Public War	ter Supp	ly		E		Carlos Molina m Enforcement Te	2m 2
Adı	min. Penalty \$	Limit Mini	mum	\$0	Maximum	\$5,000	EC S Teal	III Elliorcement re	dili Z
				Penal	ltv Calcul	ation Sec	tion		
TOTA	L BASE PENA	ALTY (Su	ım of v		•			Subtotal 1	\$250
ADIII	STMENTS (+	/-) TO S	IIRTOI	ΓΔΙ 1					
ADJO	Subtotals 2-7 are of	btained by mu	ultiplying th	ne Total Base	Penalty (Subtota	l 1) by the indicate	ed percentage.		
	<b>Compliance Hi</b>				0.0			totals 2, 3, & 7	\$0
	Natar				ant fan Canan	ianaa Hiakami			
	Notes		IN	io adjustin	ient for Compi	iance History.			
	Culpability	No			0.0	<b>6</b> Enhancement		Subtotal 4	\$0
	Notes	-	The Resp	ondent do	es not meet t	he culpability o	riteria.		
	Good Faith Eff	ort to Con	nnly Tot	al Adiust	ments			Subtotal 5	\$0
		0.000	р.у тос	a. Majase					
	F	- C.						C-1-1-1-1-1-	
	Economic Ben	Total EB A	mounts	\$21		<b>/o</b> Enhancement*  ped at the Total El	3 \$ Amount	Subtotal 6	\$0
	Estimated	d Cost of Com		\$360		ped de are rotar E.	φ ,ο αε		
CLINA	OF CURTOTA								+250
SUM (	OF SUBTOTA	LS 1-/						Final Subtotal	\$250
OTHE	R FACTORS	AS IIIST	ICF MA	V REOU	ITDF	0.09	6	Adjustment	\$0
Reduces	or enhances the Fina	Subtotal by	the indicat	ed percentag	e.	0.0	<del>/0</del>	Aujustinent	
	Notes								
							Final D		#250
							Final Po	enalty Amount	\$250
STATI	UTORY LIMI	T ADJUS	TMFNT	_			Final Ace	sessed Penalty	\$250
	J. J. K. 121.112	. 7.2500					1 7155		T
DEFE	RRAL					20.0	<b>6</b> Reduction	Adjustment	-\$50
Reduces	the Final Assessed Pe	enalty by the	indicated p	ercentage.					
	Notos		Do	formal offe	rad for avead	tad cattlament			
	Notes		De	rerral offe	red for expedi	ted settlement	•		

\$200

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Screening Date 16-Feb-2021

**Docket No.** 2021-0274-MLM-E

**Respondent** NORTHERN HILLS DEVELOPMENT CO., INC. (PCW 2)

**Case ID No.** 60406

Reg. Ent. Reference No. RN101267565

**Media** Water Rights

Enf. Coordinator Carlos Molina

	Compliance History Worksheet  > Compliance History Site Enhancement (Subtotal 2)								
>>	Compliance Hist Component	,	Number	Adjust.					
	NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%					
		Other written NOVs	0	0%					
		Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	0	0%					
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%					
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%					
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%					
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%					
	Emissions	Chronic excessive emissions events (number of events)	0	0%					
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%					
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%					
		I		1					
		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%					
	3 3.7.3.	Participation in a voluntary pollution reduction program	No	0%					
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%					
		Adjustment Per	centage (Sub	total 2)	0%				
>>	Repeat Violator	(Subtotal 3)							
	N/A	Adjustment Per	rentane (Suh	total 3)	0%				
	<u> </u>		centage (Sub	total 5)	0 70				
>>	> Compliance History Person Classification (Subtotal 7)								
	N/A Adjustment Po		centage (Sub	total 7)	0%				
>>	Compliance Hist	ory Summary							
	Compilative file	5. y 5a		1					
	Compliance History Notes	No adjustment for Compliance History.							
		Total Compliance History Adjustment Percentage (S	Subtotals 2.	<i>3, &amp; 7</i> ) [	0%				
>> F	inal Compliance	History Adjustment							
		Final Adjustment Percenta	age *capped	at 100%	0%				

	Scree	ening Date	16-Feb-2021		Docl	ket No. 2021-0274-N	1LM-E	PCW
			NORTHERN HIL	LS DEVELOPM	IENT CO., INC	. (PCW 2)	Policy	Revision 4 (April 2014)
_	_	ase ID No.					PCW R	evision March 26, 2014
Reg.	Ent. Ref		RN101267565					
			Water Rights					
		oordinator	Carlos Molina					
	Viola	tion Number	1					
		Rule Cite(s)	30 Tex. Adm	nin. Code §§ 2	88.20(a) and 11.127	288.30(5)(B) and Tex. (2(c)	Water Code §	
	Violation	n Description	Failed to ma			y plan which includes a tail public supplier.	ll elements for	
							Base Penalty	\$5,000
>> Env	vironmer	ntal, Proper	ty and Hum	an Health	Matrix			
		-	_	Harm				
OB		Release	Major	Moderate	Minor			
OR		Actual				Dawassat	0.00/	
		Potential				Percent	0.0%	
>>Pro	grammat	tic Matrix						
	gramma	Falsification	Major	Moderate	Minor			
	Ī		Х			Percent	5.0%	
						1		
	Matrix Notes		100	% of the rule	requirements	were not met.		
						Adjustment	\$4,750	
								+250
							L	\$250
Violati	on Event	s						
			_		_			
		Number of \	iolation Events/	1		62 Number of vi	olation days	
			4-9.					
			daily weekly					
			monthly					
			quarterly			Violati	on Base Penalty	\$250
			semiannual					,
			annual					
			single event	Х				
	Īī							
				One single e	vent is recom	mended.		
Good F	aith Effo	rts to Com	nlv	0.0%			Reduction	\$0
dodd i	uitii Liio		Be	efore NOE/NOV	NOE/NOV to EDF	PRP/Settlement Offer	Reduction	7-
			Extraordinary					
			Ordinary					
			N/A	х				
				The Responde	ent does not m	neet the good faith crite	eria for	
			Notes	The Responde		iolation.	ind for	
			_			Vi	olation Subtotal	\$250
Econor	mic Bene	fit (EB) for	this violation	n		Statutory	Limit Test	
		Fetimate	ed EB Amount		\$21	Violation Fin	al Penalty Total	\$250
			/ount					·
				This viola	ition Final As	sessed Penalty (adj	usted for limits)	\$250

	E	conomic	Benefit	Wo	rksheet		
Respondent	NORTHERN HI	ILLS DEVELOPMEN	IT CO., INC. (P	CW 2)			
Case ID No.	60406						
Reg. Ent. Reference No.	RN101267565	i					
Media	Water Rights					Percent Interest	Years of
Violation No.	1					r creent interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	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)	\$360	16-Dec-2020	5-Feb-2022	1.14	\$21	n/a	\$21
Notes for DELAYED costs		from the i	nvestigation da	te to th	e estimated date o		·
Avoided Costs	ANNU	ALIZE avoided c	osts before ei			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 \$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

The TCEQ is committed to accessibility.

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



## Compliance History Report

Compliance History Report for CN600698138, RN101267565, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or CN600698138, Northern Hills Development Classification: NOT APPLICABLE Rating: N/A

Owner/Operator: Co., Inc.

Regulated Entity: RN101267565, NORTHERN HILLS WATER Classification: NOT APPLICABLE Rating: N/A

SERVICE

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

CH Group: 14 - Other

**Location:** 0.2 MILES NORTH OF THE INTERSECTION OF ALLRED CIRCLE AND STINSON ROAD IN DENISON, GRAYSON

TCEQ Region:

ID Number(s):

REGION 04 - DFW METROPLEX

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0910126 WATER LICENSING LICENSE 0910126

Compliance History Period: September 01, 2015 to August 31, 2020 Rating Year: 2020 Rating Date: 09/01/2020

**Date Compliance History Report Prepared:** June 17, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: June 17, 2016 to June 17, 2021

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

Name: Carlos Molina Phone: (512) 239-2557

### Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period? YES

2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

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

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

N/A

**B.** Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

N/A

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

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

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

	N/A
I.	Participation in a voluntary pollution reduction program: N/A
J.	Early compliance: N/A
Sit	es Outside of Texas: N/A

H. Voluntary on-site compliance assessment dates:

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
NORTHERN HILLS	§	TEXAS COMMISSION ON
DEVELOPMENT CO., INC.	§	
RN101267565	§	ENVIRONMENTAL QUALITY

### AGREED ORDER DOCKET NO. 2021-0274-MLM-E

### I. JURISDICTION AND STIPULATIONS

On,	the Texas Commission on Environmental Quality ("the
Commission" or "TCEQ") consid	lered this agreement of the parties, resolving an enforcement
action regarding NORTHERN H	ILLS DEVELOPMENT CO., INC. (the "Respondent") under the
authority of TEX. HEALTH & SAFE	ETY CODE ch. 341 and TEX. WATER CODE chs. 5 and 11. The
Executive Director of the TCEQ,	through the Enforcement Division, and the Respondent
together stipulate that:	- -

- 1. The Respondent owns and operates a public water supply located 0.2 miles north of the intersection of Allred Circle and Stinson Road in Denison, Grayson County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 85 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 adjoins, is contiguous with, surrounds, or is near or adjacent to water in the state as defined in Tex. Water Code § 11.021 and 30 Tex. Admin. Code § 297.1(52).
- 2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to Tex. Water Code § 7.002 & 11.0842 and Tex. Health & Safety Code § 341.049, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to Tex. Water Code § 5.013 & 11.0842 and Tex. Health & Safety Code § 341.031 because it alleges violations of Tex. Health & Safety Code ch. 341, Tex. Water Code chs. 5 and 11, and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$11,297 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$298 of the penalty and \$2,259 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions of this Order.

The remaining amount of \$8,740 of the undeferred penalty shall be paid in 30 monthly payments of \$288 each and one final payment of \$100. The first monthly payment shall be paid within 30 days after the effective date of this Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until the penalty is paid in full. If the Respondent fails to comply with the payment requirements of this Order, including the payment schedule, the Executive Director may accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. The Respondent's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms and conditions of this Order and the Executive Director may demand payment of all or part of the deferred penalty amount.

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

### II. ALLEGATIONS

- 1. During an investigation conducted from December 16, 2020 to December 22, 2020, an investigator documented that the Respondent:
  - a. Failed to operate the Facility under the direct supervision of a water works operator who holds a Class "D" license or higher, in violation of 30 TEX. ADMIN. CODE § 290.46(e)(3)(A) and TEX. HEALTH & SAFETY CODE § 341.033(a).
  - b. Failed to maintain a drought contingency plan which includes all elements for municipal use by a retail public water supplier, in violation of 30 TEX. ADMIN. CODE §§ 288.20(a) and 288.30(5)(B) and TEX. WATER CODE § 11.1272(c).
  - c. Failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference, in violation of 30 TEX. ADMIN. CODE § 290.42(1).

- d. Failed to maintain a water purchase contract available for review to the Executive Director in order that production, storage, service pump, or pressure maintenance capacity may be properly evaluated, in violation of 30 TEX. ADMIN. CODE § 290.45(f)(1).
- e. Failed to maintain water works operations 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)(ii)(III), (f)(3)(A)(iii), (f)(3)(B)(ii), (f)(3)(D)(i), (f)(3)(D)(vii), (f)(3)(E)(ii), (f)(3)(E)(iii), (f)(3)(E)(iv), (f)(3)(E)(ix), and (f)(3)(F). Specifically, the Facility did not have records of the amount of water distributed each week, the date, location, and nature of water quality, pressure, or outage complaints received by the system and the results of any subsequent complaint investigation, copies of any public notice issued by the water system, results of microbiological analyses, Consumer Confidence Report compliance documentation, results of chemical analyses, any written reports, summaries, or communications relating to sanitary surveys, copies of the Customer Service Inspection reports, any Sample Siting Plans and monitoring plans, and records relating to lead and copper requirements were not maintained on-site for review.
- f. Failed to create a nitrification action plan for all systems distributing chloraminated water, in violation of 30 Tex. ADMIN. CODE § 290.46(z).
- g. Failed to flush all dead-end mains at monthly intervals, in violation of 30 TEX. ADMIN. CODE § 290.46(1).
- h. Failed to monitor the disinfectant residual at representative locations throughout the distribution system at least once every seven days, in violation of 30 TEX. ADMIN. CODE § 290.110(c)(4)(A).
- i. Failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in violation of 30 Tex. Admin. Code § 290.46(i).
- j. 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).
- k. Failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in violation of 30 Tex. ADMIN. CODE § 290.46(n)(2).
- 2. During a record review conducted on February 21, 2021, an investigator documented that the Respondent failed to pay annual Public Health Service fees and/or any associated late fees for TCEQ Financial Administration Account No. 90910126 for Fiscal Years 2019, 2020, and 2021, in violation of 30 Tex. ADMIN. CODE § 290.51(a)(6) and Tex. WATER CODE § 5.702.

### III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

#### IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: NORTHERN HILLS DEVELOPMENT CO., INC., Docket No. 2021-0274-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 undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Order:
    - i. Submit payment for all outstanding fees, interest, and penalties for TCEQ Financial Administration Account No. 90910126. The payment shall be sent with the notation "NORTHERN HILLS DEVELOPMENT CO., INC., Financial Administration Account No. 90910126" to the address listed in Ordering Provision No. 1;
    - ii. Begin operating the Facility under the direct supervision of a water works operator who hold a class "D" or higher license, in accordance with 30 Tex. Admin. Code § 290.46;
    - iii. Compile and maintain properly completed water works operation and maintenance records, including the amount of water distributed each week, the date, location, and nature of water quality, pressure, or outage complaints received by the system and the results of any subsequent complaint investigation, copies of any public notice issued by the water system, results of microbiological analyses, Consumer Confidence Report compliance documentation, results of chemical analyses, any written reports, summaries, or communications relating to sanitary surveys, copies of the Customer Service Inspection reports, any Sample Siting Plans and monitoring plans, and records relating to lead and copper requirements were not maintained on-site for review, in accordance with 30 Tex. Admin. Code § 290.46;

- iv. Create a nitrification action plan, in accordance with 30 TEX. ADMIN. CODE § 290.46;
- v. Begin flushing all dead-end mains at monthly intervals or more often as needed if water quality complaints are received from water customers or if disinfectant residuals fall below acceptable levels, in accordance with 30 Tex. Admin. Code § 290.46. This provision will be satisfied upon three months of consecutive complaint monthly flushing;
- vi. Monitor the disinfectant residual at representative locations throughout the distribution system at least once every seven days, in accordance with 30 Tex. ADMIN. CODE § 290.110;
- vii. Begin collecting all required 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; and
- viii. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in accordance with 30 TEX. ADMIN. CODE § 290.46.
- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.j below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.ii through 2.a.iv, 2.a.vi, and 2.a.viii.
- c. Within 60 days after the effective date of this Order, develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference, 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. 2.j below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.c.
- e. Within 90 days after the effective date of this Order:
  - i. Prepare and adopt a complete drought contingency plan, in accordance with 30 Tex. ADMIN. CODE §§ 288.20 and 288.30; and
  - ii. Adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in accordance with 30 Tex. Admin. Code § 290.46.
- f. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.j below, and include detailed supporting

documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.e.i and 2.e.ii.

- g. Within 135 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.j below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a.v.
- h. Within 180 days after the effective date of this Order, to secure a water purchase contract, in accordance with 30 Tex. ADMIN. CODE § 290.45.
- i. Within 195 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.j below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.h.
- j. 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 No. 2.a.vii. 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 Dallas/Fort Worth Regional Office Texas Commission on Environmental Quality 2309 Gravel Drive Fort Worth, Texas 76118-6951

3. All relief not expressly granted in this Order is denied.

- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 5. If the Respondent fails to comply with Ordering Provision No. 2.e.i 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.
- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
- 7. 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.
- 8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under Tex. Bus. Org. Code § 1.002.
- 9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

NORTHERN HILLS DEVELOPMENT CO., INC. DOCKET NO. 2021-0274-MLM-E Page 8

## **SIGNATURE PAGE**

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date			
(m)	12/5/2022			
For the Executive Director	Date			
I, the undersigned, have read and understand the attached Order, and I do agree to the terms acknowledge that the TCEQ, in accepting paymon such representation.				
I also understand that failure to comply with the and/or failure to timely pay the penalty amount				
<ul> <li>A negative impact on compliance history;</li> <li>Greater scrutiny of any permit applications submitted;</li> <li>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;</li> <li>Increased penalties in any future enforcement actions;</li> <li>Automatic referral to the Attorney General's Office of any future enforcement actions; a</li> <li>TCEQ seeking other relief as authorized by law.</li> </ul>				
In addition, any falsification of any compliance	documents may result in criminal prosecution.			
Signature	05/27/22 Date Owner/CEO			
R. Bruce Wilkins  Name (Printed or typed)  Authorized Representative of  NORTHERN HILLS DEVELOPMENT CO., INC.	Title			
$\ \square$ If mailing address has changed, please chec	ck this box and provide the new address below:			