**Order Type:** Findings Agreed Order **Findings Order Justification:** Indifference to legal duty based on violation of a previous order. Media: PWS **Small Business:** No Location(s) Where Violation(s) Occurred: City of Post PWS, 105 East Main Street, Garza County Type of Operation: Public water supply **Other Significant Matters:** Additional Pending Enforcement Actions: No Past-Due Penalties: No Other: N/A Interested Third-Parties: None Texas Register Publication Date: May 13, 2022 Comments Received: No

# **Penalty Information**

Total Penalty Assessed: \$140,529 Total Paid to General Revenue: \$140,529 Total Due to General Revenue: \$0 Payment Plan: N/A Compliance History Classifications: Person/CN - Satisfactory Site/RN - N/A Major Source: Yes Statutory Limit Adjustment: N/A Applicable Penalty Policy: January 2021 Investigation Information

Complaint Date(s): N/A Complaint Information: N/A Date(s) of Investigation: May 12, 2021 through May 26, 2021 Date(s) of NOE(s): July 23, 2021

#### **Violation Information**

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

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

3. Failed to inspect the Facility's 1 million gallon ground storage tank annually [30 TEX. ADMIN. CODE § 290.46(m)(1)(A)].

4. Failed to maintain a thorough and up-to-date plant operations manual for operator review and reference [30 Tex. ADMIN. CODE § 290.42(l)].

5. Failed to monitor the disinfectant residual at representative locations in the distribution system at least once per day [30 Tex. ADMIN. CODE § 290.110(c)(4)(B)].

6. Failed to operate the Facility under the direct supervision of at least two water works operators who hold a Class "C" or higher license and each work at least 16 hours per month [30 Tex. ADMIN. CODE § 290.46(e)(4)(C) and Tex. HEALTH & SAFETY CODE § 341.033(a) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.i].

7. Failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation [30 TEX. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(i)(II), (f)(3)(A)(iii), and (f)(3)(A)(iv) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.ii].

8. Failed to conduct an inspection of the interior of the Facility's 0.01 million gallon pressure tank with an inspection port at least once every five years [30 TEX. ADMIN. CODE § 290.46(m)(1)(B) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.iv].

9. Failed to have all backflow prevention assemblies tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications [30 TEX. ADMIN. CODE § 290.44(h)(4) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.v].

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) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.vi].

11. 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) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.i].

12. Failed to complete a Customer Service Inspection ("CSI") certificate prior to providing continuous service to new construction or any existing service when the water purveyor has reason to believe that a cross-connection or other potential contamination hazard exists [30 TEX. ADMIN. CODE § 290.46(j) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.ii].

13. Failed to develop a nitrification action plan for a system distributing chloraminated water [30 Tex. ADMIN. CODE § 290.46(z) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.iii].

14. Failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements [30 TEX. ADMIN. CODE § 290.121(a) and (b) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.iv].

15. Failed to provide adequate containment facilities for all liquid chemical storage tanks [30 TEX. ADMIN. CODE § 290.42(f)(1)(E)(ii) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.e.i].

16. Failed to provide a sampling tap at locations that allow for the chlorine and ammonia to be added to the water to form monochloramine as the primary species [30 TEX. ADMIN. CODE § 290.42(e)(7)(C) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.e.ii].

17. Failed to provide a device to readily determine the air-water-volume for the pressure tank [30 Tex. ADMIN. CODE § 290.43(d)(3)].

18. Failed to inspect the Facility's 0.01 MG pressure tank annually [30 Tex. ADMIN. CODE § 290.46(m)(1)(B)].

# **Corrective Actions/Technical Requirements**

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

The Respondent implemented the following corrective measures:

a. By inspecting the 1 million gallon ground storage tank by June 9, 2021;

b. By providing records of dead-end main flushing and provided a complaint log by July 8, 2021;

c. By repairing the site glass on the pressure tank by July 8, 2021;

d. By cleaning up the buildup of LAS on the LAS injection pump at the White River injection site by August 2, 2021;

e. By maintaining an up-to-date and thorough plant operations manual for operator review and reference by August 19, 2021;

f. By conducting the interior inspection for the Facility's 0.01 million gallon pressure tank by August 26, 2021;

g. By conducting an inspection of the Facility's 0.01 million gallon pressure tank by August 26, 2021;

h. By providing adequate containment facilities for the LAS storage containers at the Slaton tank, White River Municipal Water District booster station, and Post tank by September 2, 2021;

i. By installing adequate sampling taps at locations that allow for the chlorine and ammonia to be added to the water to form monochloramine as the primary species by September 2, 2021;

j. By replacing the building where the rust was encountered on the building surrounding the LAS at the White River injection site by September 2, 2021;

k. By providing records for the amount of each chemical used each day by January 27, 2022;

l. By submitting copies of backflow prevention assembly tests for McDonalds and Holly's Drive-In by February 9, 2022;

m. By submitting photos demonstrating that the fan in the chlorinator room at the White River injection site was replaced by February 15, 2022; and

n. By submitting a nitrification action plan by March 21, 2022.

# **Technical Requirements:**

The Order will require the Respondent to:

a. Within 30 days:

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

ii. Operate the Facility under the direct supervision of two water works operators who hold a Class "C" or higher license and who each work at least 16 hours per month;

iii. Complete a CSI for all existing locations at which the water purveyor has reason to believe cross-connections or other potential contamination hazards exist, including but not limited to the new high school, elementary school, Jack & Jill Donuts, EMS Building, field house, and car wash;

iv. 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

v. Begin monitoring the disinfectant residual throughout the distribution system at sites designated in the public water system's monitoring plan at least once every day. This provision will be satisfied upon three months of compliant monitoring.

b. Within 45 days, submit written certification to demonstrate compliance with a.i. through a.iii.

c. Within 60 days:

i. Ensure that all backflow prevention assemblies are tested upon installation and on an annual basis by a recognized backflow assembly tester and certify that they are operating within specifications;

ii. Adopt an adequate plumbing ordinance, regulation, or service agreement with provisions for proper enforcement to include the service connections located outside the city limits to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, including but not limited to the service locations located outside of city limits; and

iii. Develop and maintain a chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements.

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

e. Within 90 days, implement a CSI program to ensure all service connections are properly inspected.

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 225 days, submit written certification to demonstrate compliance with a.iv.

#### **Contact Information**

TCEQ Attorney: N/A TCEQ Enforcement Coordinator: Epifanio Villarreal, Enforcement Division, Enforcement Team 4, MC R-14, (361) 825-3421; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548 Respondent: The Honorable Marvin Self, Mayor, City of Post, 105 East Main Street, Post, Texas 79356 Respondent's Attorney: N/A

SOMMISSION ST	Policy Re	Pe evision 5 (January 28,	-	Calculation	n Workst	neet (PC	-	vision February	y 11, 2021
DATES	Assigned	26-Jul-2021			F		,		
	PCW	26-Jul-2021	Screening	27-Jul-2021	EPA Due				
RESPON		TY INFORMATIO							1
Rea.	Respondent Ent. Ref. No.	City of Post (PCW RN101421519	/ No. 1)						
	//Site Region				Major/M	linor Source	Major		-
	FORMATION								
	/Case ID No.	56405			No. c	of Violations	5		1
	Docket No.	2021-0978-PWS-	=			Order Type	Findings		
Media		Public Water Sup	ply		Government		Yes Epifanio Villar	rool	
	Multi-Media				CIII.		Enforcement		-
Adm	in. Penalty \$ L	imit Minimum	\$50	Maximum	\$1,000				J
			Davad						
				ty Calculat		on			
TOTAL	BASE PENA	LTY (Sum of	violation	base penalt	ies)		Subtotal 1		\$1,650
ADJUS	TMENTS (+,	/-) TO SUBTO	TAL 1						
	ubtotals 2-7 are ob Compliance His	tained by multiplying	the Total Base	Penalty (Subtotal 1) 34.0%		-	tals 2, 3, & 7		\$561
	compliance m	1			Adjustment				3301
	Notes	Ennancement ro		Vs with dissimila taining a denial c		i one agreed			
	l						J		
C	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Res	spondent do	es not meet the	culpability crite	eria.			
	l								
G	Good Faith Effe	ort to Comply To	otal Adjust	ments			Subtotal 5		-\$30
			••••						1
E	conomic Bene	efit		0.0%	Enhancement*		Subtotal 6		\$0
		Total EB Amounts	\$4,226		at the Total EB \$ /	Amount			
	Estimated	Cost of Compliance	\$8,222	_					
SUM O	F SUBTOTAI	LS 1-7				E	inal Subtotal		\$2,181
ATUER									+0
		Subtotal by the indic			0.0%		Adjustment		\$0
		,							
	Notes								
	l					Final Per	alty Amount		\$2,181
							-		
STATU	TORY LIMIT	ADJUSTMEN	T			Final Asse	ssed Penalty		\$2,181
DEFER					0.0%	Reduction	Adjustment		\$0
		nalty by the indicated	percentage.		0.070	Reduction	Aujustment		φU
			c						
	Notes	No d	ererral is re	commended for I	-indings Orders	5.			
	I						1		
PAYAB	LE PENALT	1							\$2,181

кеg.	. Ent. Refere	Media Public Water Supply		
	Enf. Coo	rdinator Epifanio Villarreal		
	malianco Hist	Compliance History Worksheet ory Site Enhancement (Subtotal 2)		
	Component	Number of	Number	Adjust.
	NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria )	0	0%
		Other written NOVs	7	14%
		Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	1	20%
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0%
	Judgments and Consent			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%
	Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
	Emissions	Chronic excessive emissions events (number of events)	0	0%
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		0%
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%
Ī		Environmental management systems in place for one year or more	No	0%
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	other	Participation in a voluntary pollution reduction program	No	0%
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
		Adjustment Per	rcentage (Sub	<b>total 2)</b> 34
> Re	peat Violator	(Subtotal 3)		
[	N/A		rcentage (Sub	ototal 3) 0
> Coi	-	ory Person Classification (Subtotal 7)		<u>.</u>
[	Satisfactory I		rcentage (Sub	ototal 7) 0
> Coi	mpliance Hist	bry Summary		
	Compliance History Notes	Enhancement for seven NOVs with dissimilar violations and one agreed order con of liability.	taining a denial	
		Total Compliance History Adjustment Percentage (	Subtotals 2,	<b>3, &amp; 7)</b> 3
> Fina	I Compliance	History Adjustment		
		Final Adjustment Percent	age *capped	at 100% 34

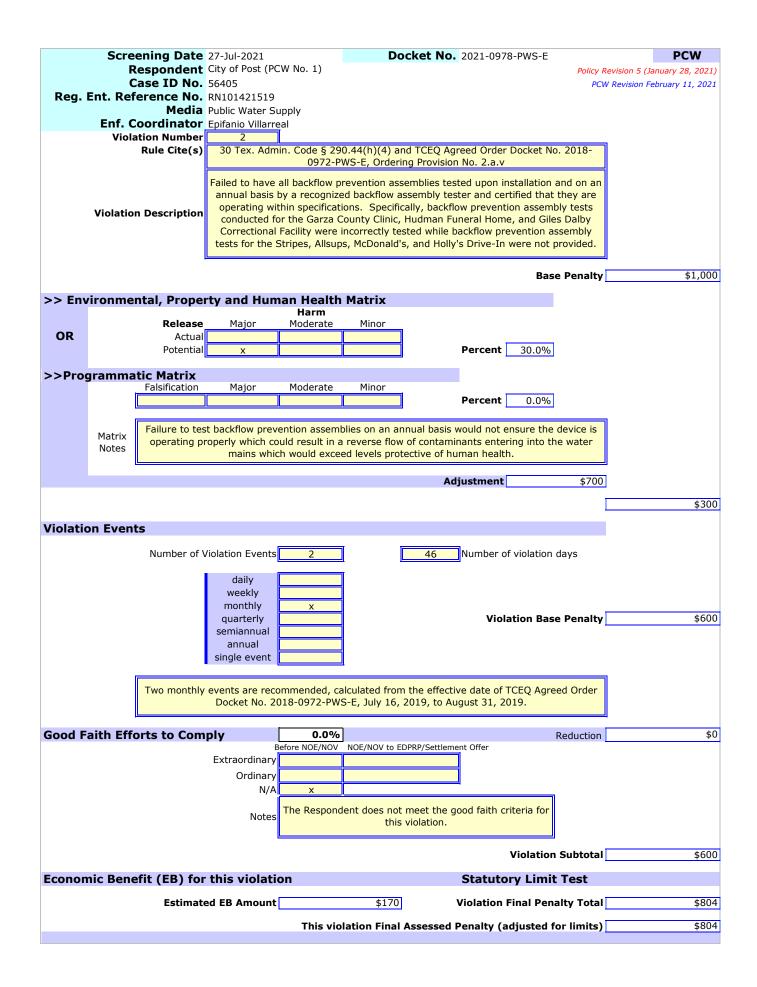
#### PCW

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

Screening Date 27-Jul-2021

Responden Case ID No	27-Jul-2021	Do	ocket No. 2021-0978-PWS-E	PCW
Case ID No	City of Post (PCW No	o. 1)		Policy Revision 5 (January 28, 2021)
				PCW Revision February 11, 2021
Reg. Ent. Reference No				
Enf. Coordinato	Public Water Supply	,		
Violation Numbe				
	30 Tex Admin	Code § 290.46(e)(4	4)(C) and Tex. Health & Safety Code	ξ
Rule Cite(s			Docket No. 2018-0972-PWS-E, Orderi	
		Provisio	n No. 2.a.i	
	Epiled to operate t	the Eacility under th	a direct supervision of at least two w	atar
	works operators wh		e direct supervision of at least two wa or higher license and each work at lea	
Violation Descriptio			ically, the Facility used two operators	
		a Class	"D" license.	
			Base Pe	nalty \$1,000
				φ <u></u>
>> Environmental, Prop				
Releas		<b>larm</b> derate Minor		
OR Actua				
Potentia		х	<b>Percent</b> 15.0%	
>>Programmatic Matrix Falsification	Major Mo	derate Minor		
			Percent 0.0%	
			vision of an appropriately licensed wa	
			hich could expose persons served by	
Notes Facility to	a significant amount o	human healt	ch would not exceed levels protective	
			Adjustment	\$850
				¢150
				\$150
				\$150
Violation Events				\$150
	Violation Events	1	46 Number of violation days	
	Violation Events	1	46 Number of violation days	
	daily	1	46 Number of violation days	
	daily weekly	1	46 Number of violation days	
	daily weekly monthly			5
	daily weekly	1	46 Number of violation days	5
	daily weekly monthly quarterly			5
	daily weekly monthly quarterly semiannual			5
	daily weekly monthly quarterly semiannual annual			5
Number of	daily weekly monthly quarterly semiannual single event y event is recommen	x ded, calculated from	Violation Base Pe	s malty \$150
Number of	daily weekly monthly quarterly semiannual single event y event is recommen	x ded, calculated from	Violation Base Pe	s malty \$150
Number of One quarte	daily weekly monthly quarterly semiannual annual single event vevent is recommen Docket No. 2018-09	ded, calculated from 972-PWS-E, July 16	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019.	s malty \$150
Number of	daily weekly quarterly semiannual annual single event ly event is recommen Docket No. 2018-09 nply Before	ded, calculated from 972-PWS-E, July 16	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019.	s malty \$150
Number of One quarte	daily weekly monthly quarterly semiannual annual single event vevent is recommen Docket No. 2018-09	ded, calculated from 972-PWS-E, July 16	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019. Redu	s malty \$150
Number of One quarte	daily weekly quarterly semiannual annual single event ly event is recommen Docket No. 2018-09 nply Before	ded, calculated from 972-PWS-E, July 16	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019. Redu	s malty \$150
Number of One quarte	daily weekly quarterly semiannual annual single event ly event is recommen Docket No. 2018-00 nply Before Extraordinary	ded, calculated from 972-PWS-E, July 16	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019. Redu	s malty \$150
Number of One quarte	daily weekly quarterly semiannual single event dy event is recommen Docket No. 2018-00 nply Before Extraordinary Ordinary N/A The	ded, calculated from 972-PWS-E, July 16 0.0% NOE/NOV NOE/NOV to	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019. Redu	s malty \$150
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Number of One quarte	daily weekly quarterly semiannual single event dy event is recommen Docket No. 2018-00 nply Before Extraordinary Ordinary N/A The	ded, calculated from 972-PWS-E, July 16 0.0% NOE/NOV NOE/NOV to	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019. Redu EDPRP/Settlement Offer not meet the good faith criteria his violation.	s malty \$150
Number of One quarte	daily weekly quarterly semiannual single event dy event is recommen Docket No. 2018-00 nply Before Extraordinary Ordinary N/A The	ded, calculated from 972-PWS-E, July 16 0.0% NOE/NOV NOE/NOV to	Violation Base Pe	s malty \$150
Number of One quarte	daily weekly monthly quarterly semiannual annual single event Docket No. 2018-09 pocket N	ded, calculated from 972-PWS-E, July 16 0.0% NOE/NOV NOE/NOV to	Violation Base Pe the effective date of TCEQ Agreed C , 2019, to August 31, 2019. Redu EDPRP/Settlement Offer not meet the good faith criteria his violation.	s onalty \$150 order Juction \$0 ptotal \$150
Number of One quarte Good Faith Efforts to Cor	daily weekly monthly quarterly semiannual annual single event Docket No. 2018-09 hply Extraordinary Ordinary N/A Notes The Notes	ded, calculated from 972-PWS-E, July 16 0.0% NOE/NOV NOE/NOV to x	Violation Base Pe	order Order Juction \$0
Number of One quarte Good Faith Efforts to Cor	daily weekly monthly quarterly semiannual annual single event Docket No. 2018-09 Docket N	ded, calculated from 972-PWS-E, July 16 0.0% NOE/NOV NOE/NOV to x 2 Respondent does r for th \$3,354	Violation Base Pe	s order order st total \$150 \$

	E	conomic	Benefit	Wor	rksheet		
Respondent	City of Post (P	CW No. 1)					
Case ID No.	56405						
Reg. Ent. Reference No.	RN101421519						
Media	Public Water S	upply					Years of
Violation No.		,				Percent Interest	Depreciation
						5.0	. 15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
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							
		ALTZE avaided a		toring	item (eveent fer		Leoste)
Avoided Costs	ANNU	ALIZE avoided co	osts before en		<u> </u>	one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Disposal Personnel	\$1,571	ALIZE avoided co	osts before en 27-Jul-2021	0.00	\$0 \$160	\$0 \$3,194	\$0 \$3,354
Disposal Personnel Inspection/Reporting/Sampling				0.00 2.03 0.00	\$0 \$160 \$0	\$0 \$3,194 \$0	\$0 \$3,354 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment				0.00 2.03 0.00 0.00	\$0 \$160 \$0 \$0 \$0	\$0 \$3,194 \$0 \$0	\$0 \$3,354 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 2.03 0.00 0.00 0.00	\$0 \$160 \$0 \$0 \$0 \$0	\$0 \$3,194 \$0 \$0 \$0 \$0	\$0 \$3,354 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 2.03 0.00 0.00 0.00 0.00	\$0 \$160 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$3,194 \$0 \$0 \$0 \$0 \$0	\$0 \$3,354 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	\$1,571 \$1,571	16-Jul-2019	27-Jul-2021	0.00 2.03 0.00 0.00 0.00 0.00 0.00	\$0 \$160 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$3,194 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$3,354 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	\$1,571 The avoided of Class "D" o	16-Jul-2019	27-Jul-2021 stimated amour y or contract twe cotive date of TC	0.00 2.03 0.00 0.00 0.00 0.00 t (differ o or mo EQ Agre	\$0 \$160 \$0 \$0 \$0 \$0 \$0 rence in annual sa re water operators eed Order Docket	\$0 \$3,194 \$0 \$0 \$0 \$0 \$0	\$0 \$3,354 \$0 \$0 \$0 \$0 \$0 operator and a C" license or
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	\$1,571 The avoided of Class "D" o	16-Jul-2019	27-Jul-2021 stimated amour y or contract twe cotive date of TC	0.00 2.03 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$160 \$0 \$0 \$0 \$0 \$0 rence in annual sa re water operators eed Order Docket	\$0 \$3,194 \$0 \$0 \$0 \$0 \$0 \$0 ary for a Class "C" s who hold a Class "	\$0 \$3,354 \$0 \$0 \$0 \$0 \$0 operator and a C" license or
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	\$1,571 The avoided of Class "D" o	16-Jul-2019	27-Jul-2021 stimated amour y or contract twe cotive date of TC	0.00 2.03 0.00 0.00 0.00 0.00 t (differ o or mo EQ Agre	\$0 \$160 \$0 \$0 \$0 \$0 \$0 rence in annual sa re water operators eed Order Docket	\$0 \$3,194 \$0 \$0 \$0 \$0 \$0 ary for a Class "C" s who hold a Class " No. 2018-0972-PWS	\$0 \$3,354 \$0 \$0 \$0 \$0 \$0 operator and a C" license or



Respondent		conomic	Benefit	Woi	rksheet		
		CW No. 1)					
Case ID No.							
Reg. Ent. Reference No.	RN101421519						
	Public Water S	upply				Percent Interest	Years of
Violation No.	2						Depreciation
						5.0	1
	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	\$100	16-Jul-2019	1-Aug-2022	3.05	\$15	n/a	\$15
Remediation/Disposal				0.00	\$0	n/a	\$0
Other (as needed) Other (as needed)	\$62 \$62	<u>16-Jul-2019</u> 16-Jul-2019	<u>1-Aug-2022</u> 1-Aug-2022	3.05 3.05	\$9 \$9	n/a n/a	<u>\$9</u> \$9
		hin specifications,	asis by a recogni calculated from	ized bac the eff	kflow assembly te ective date of TCE	ster and are certifie Q Agreed Order Doo	,
Notes for DELAYED costs	operating with The Other (ar tests for l assemblies for	hin specifications, 09 s needed) delaye McDonalds and Ho r Stripes and Allsu	asis by a recogni calculated from 72-PWS-E, to th d costs include t blly's Drive-In (\$ ups (\$31 x two lo	ized bac the eff e estim he estim 31 x two ocations	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and to s), calculated from	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back to test the backflow p the effective date o	d that they ar cket No. 2018 kflow assembl prevention of TCEQ Agree
	operating with The Other (at tests for assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu ret No. 2018-0973	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the o	ized bac the eff e estim he estim 531 x two ocations date of	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and to s), calculated from compliance and th	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back o test the backflow p the effective date o e estimated date of	d that they ar cket No. 2018 kflow assembl prevention of TCEQ Agree compliance.
Avoided Costs	operating with The Other (at tests for assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu ret No. 2018-0973	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the o	ized bac the eff e estim he estim 31 x two ocations date of tering	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and to s), calculated from compliance and th item (except for	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back o test the backflow p the effective date o e estimated date of <b>one-time avoide</b>	d that they ar cket No. 2018 kflow assembl prevention of TCEQ Agree compliance.
Avoided Costs Disposal	operating with The Other (at tests for assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu ret No. 2018-0973	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the o	the estimates of the es	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and to s), calculated from compliance and th item (except for \$0	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back to test the backflow p the effective date of e estimated date of one-time avoideo \$0	d that they ar cket No. 2018 kflow assembl prevention of TCEQ Agree compliance. 1 costs) \$0
Avoided Costs Disposal Personnel	operating with The Other (at tests for assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu ret No. 2018-0973	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the o	the estimation of the estimati	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and to s), calculated from compliance and th item (except for \$0 \$0	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back to test the backflow p the effective date of e estimated date of one-time avoided \$0 \$0	d that they ar cket No. 2018 forevention of TCEQ Agree compliance. d costs) \$0 \$0
Avoided Costs Disposal Personnel	operating with The Other (at tests for assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu ret No. 2018-0973	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the o	the estimates of the es	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and to s), calculated from compliance and th item (except for \$0	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back to test the backflow p the effective date of e estimated date of one-time avoideo \$0	d that they ar cket No. 2018 kflow assembl prevention of TCEQ Agree compliance. 1 costs) \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	operating with The Other (at tests for assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu ret No. 2018-0973	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the o	the estimate of the estimate o	ckflow assembly te ective date of TCE ated date of comp nated amount to s vo locations) and to s), calculated from compliance and th item (except for \$0 \$0 \$0	ster and are certifie Q Agreed Order Doc liance. ubmit copies of back to test the backflow p the effective date of one-time avoidec \$0 \$0 \$0	d that they ar cket No. 2018 kflow assembl prevention of TCEQ Agree compliance. 1 costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	operating with The Other (at tests for assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu ret No. 2018-0973	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the o	ized bac the eff e estim the estim s31 x two cations date of tering 0.00 0.00 0.00	ckflow assembly te ective date of TCE ated date of comp nated amount to s ro locations) and to s), calculated from compliance and th item (except for \$0 \$0 \$0 \$0 \$0 \$0	ster and are certifie Q Agreed Order Doc liance. ubmit copies of back to test the backflow p the effective date of <b>one-time avoideo</b> \$0 \$0 \$0 \$0 \$0	d that they ar cket No. 2018 kflow assembl prevention of TCEQ Agree compliance. f Costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	operating with The Other (a: tests for l assemblies for Order Dock	hin specifications, 09 s needed) delayer McDonalds and Ho r Stripes and Allsu tet No. 2018-0972 ALIZE avoided co ALIZE avoide	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two k 2-PWS-E to the c costs before en	ized bac the eff e estim the estim s31 x two cations date of 0.00 0.00 0.00 0.00	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and to s), calculated from compliance and th item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back to test the backflow p the effective date of e estimated date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	d that they ar cket No. 2018 kflow assembly prevention of TCEQ Agree compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	operating with The Other (at tests for l assemblies for Order Dock ANNU/ \$124 The avoided c	hin specifications, 09 s needed) delayer McDonalds and Hor r Stripes and Allst ret No. 2018-0977 ALIZE avoided c ALIZE avoided c 10 10 10 10 10 10 10 10 10 10 10 10 10	asis by a recogni calculated from 72-PWS-E, to th d costs include t olly's Drive-In (\$ ups (\$31 x two lo 2-PWS-E to the c costs before en 27-Jul-2021 stimated amoun s Drive-In (\$31	zed bac the eff e estim is 1 x two cations date of tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	ckflow assembly te ective date of TCE ated date of comp nated amount to s to locations) and te s), calculated from compliance and th item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ster and are certifie Q Agreed Order Doo liance. ubmit copies of back to test the backflow p the effective date of e estimated date of <b>one-time avoideo</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d that they ar cket No. 2018- kflow assembly prevention of TCEQ Agree compliance. 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Screening Date		Docket	No. 2021-0978-PWS-E	PCW
		City of Post (PCW No. 1)		Policy R	evision 5 (January 28, 2021)
Deg En	Case ID No.			PCW	/ Revision February 11, 2021
Reg. En	t. Reference No.	Public Water Supply			
	Enf. Coordinator				
	Violation Number				
	Rule Cite(s)		0.46(j) and TCEQ A	greed Order Docket No. 2018-0972-	
			S-E, Ordering Provis		
				pection ("CSI") certificate prior to ion or any existing service when the	
		water nurveyor has reaso		cross-connection or other potential	
v	iolation Description	contamination nazard exist		had not been performed at the new	
			school, Jack & Jill D ) Building, field hous	onuts, Emergency Medical Service	
		(LHS)	, building, neid nous		
				Roce Develo	\$1,000
				Base Penalty	\$1,000
>> Envir	onmental, Prope	rty and Human Health	n Matrix		
	Release	Harm Major Moderate	Minor		
OR	Actual				
	Potential	X		<b>Percent</b> 30.0%	
>>Progra	ammatic Matrix				
>>riogia	Falsification	Major Moderate	Minor		
				Percent 0.0%	
					1
1	Matrix Failure	to conduct a CSI may result	in persons served b	y the Facility being exposed to	
1	Notes	contaminants which would			
				Adjustment \$700	
				I	\$300
\/; -   - +;	<b>-</b>				
Violation	Events				
	Number of	Violation Events 2		6 Number of violation days	
			T		
		daily weekly	-		
		monthly x			
		quarterly		Violation Base Penalty	\$600
		semiannual			
		annual			
		single event			
	Two monthly	, avanta ara racammandad	algulated from the	effective date of TCEQ Agreed Order	
	Two moneiny	Docket No. 2018-0972-PW			
Good Fait	th Efforts to Com			Reduction	\$0
		Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/S	ettlement Offer	
		Ordinary			
		Notes The Respon	dent does not meet this violat	the good faith criteria for	
				Violation Subtotal	\$600
Economic	: Benefit (EB) foi	r this violation		Statutory Limit Test	
		ed EB Amount	\$105	-	+004
	esumar		רטוא	Violation Einal Bonalty Tatal	
	Lotiniat			Violation Final Penalty Total	\$804

	E	conomic	вепент	<b>VVO</b>	rksneet		
Respondent		CW No. 1)					
Case ID No.							
Reg. Ent. Reference No.							Verseef
Media Violation No.	Public Water S 3	ыпріл				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	L						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction		<u> </u>		0.00	\$0	\$0	\$0
Land	¢500	16 1.1 2010	1 4.1 = 2022	0.00	\$0	n/a	\$0
Record Keeping System	\$500	16-Jul-2019	1-Aug-2022	3.05	<u>\$76</u> \$0	n/a n/a	<u>\$76</u> \$0
				0.00	\$0	n/a	\$0
Training/Sampling Remediation (Dispess)							
Remediation/Disposal							
	cross-connec	ctions or potential	contamination l	0.00 3.21 les the e	\$0 \$29 estimated amount may exist includin	n/a n/a to conduct CSIs at ng but not limited to	\$0 \$29 locations where the new high
Remediation/Disposal Permit Costs	The Record Ke cross-connec school, elen calculated fro The delayed	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe	layed cost includ l contamination l ack & Jill Donuts late of TCEQ Agr dat e estimated amo ected, calculated	0.00 3.21 les the e hazards , EMS B reed Orc e of con unt to in d from t	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th f TCEQ Agreed Orde	\$0 \$29 locations where the new high culated from the estimated nat all service
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	0.00 3.21 es the e hazards , EMS B reed Ord e of con unt to in d from t the est	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date o cimated date of cor	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th f TCEQ Agreed Orde	\$0 \$29 locations where the new high culated from the estimated hat all service er Docket No.
Remediation/Disposal Permit Costs Other (as needed)	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	0.00 3.21 es the e hazards , EMS B reed Ord e of con unt to in d from t the est	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date o cimated date of cor	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Order mpliance.	\$0 \$29 locations where the new high culated from the estimated hat all service er Docket No.
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	0.00 3.21 les the e hazards , EMS B reed Ord e of con unt to in d from t the est tering	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date o cimated date of cor <b>item (except for</b>	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Order mpliance.	\$0 \$29 locations where the new high culated from the estimated hat all service er Docket No. d costs)
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	0.00 3.21 les the e hazards , EMS B reed Orc e of con unt to in from t the est tering 0.00	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date o cimated date of cor <b>item (except for</b> \$0	n/a n/a to conduct CSIs at g but not limited to a, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Ord mpliance. one-time avoided \$0	\$0 \$29 locations where the new high culated from the estimated hat all service er Docket No. <b>d costs)</b> \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	0.00 3.21 es the e hazards , EMS B reed Ord e of con unt to in from t the est tering 0.00	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date o imated date of cor <b>item (except for</b> \$0 \$0	n/a n/a to conduct CSIs at g but not limited to a, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Order mpliance.	\$0 \$29 locations where the new high culated from the estimated nat all service er Docket No. <b>1 costs)</b> \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	es the end azards , EMS B reed Ord e of com the est tering 0.00 0.00 0.00 0.00	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Order ppliance.	\$0 \$29 locations where the new high culated from the estimated nat all service er Docket No. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	0.00 3.21 es the e hazards , EMS B reed Ord e of con unt to in the est tering 0.00 0.00 0.00 0.00 0.00	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Ord mpliance. <b>one-time avoideo</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$29 locations where the new high culated from the estimated pat all service er Docket No. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	es the end azards , EMS B reed Ord e of com the est tering 0.00 0.00 0.00 0.00	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Order ppliance.	\$0 \$29 locations where the new high culated from the estimated nat all service er Docket No. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The Record Ke cross-connec school, elen calculated fro The delayed connections	eeping System del ctions or potential nentary school, Ja om the effective d d cost includes the are properly inspe 2018-	layed cost includ   contamination   ack & Jill Donuts  ate of TCEQ Agr dat e estimated amo ected, calculated .0972-PWS-E, to	0.00 3.21 es the e hazards , EMS B reed Ord e of con unt to in the est tering 0.00 0.00 0.00 0.00 0.00	\$0 \$29 estimated amount may exist includin uilding, field house der Docket No. 201 npliance. mplement a CSI pr he effective date of cor item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a to conduct CSIs at g but not limited to e, and car wash, cal 18-0972-PWS-E, to rogram to ensure th of TCEQ Agreed Ord mpliance. <b>one-time avoideo</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$29 locations where the new high culated from the estimated pat all service er Docket No. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Docket No	. 2021-0978-PWS-E		PCW
			City of Post (PCW No	. 1)				evision 5 (January 28, 2021)
Rea.		Case ID No.	S6405 RN101421519				PCW	Revision February 11, 2021
			Public Water Supply					
			Epifanio Villarreal					
	Viola	ation Number						
		Rule Cite(S)	30 Tex. Admin. Code	e § 290.42(†)( 0972-PWS-F	1)(E)(II) and TCE , Ordering Provisi	Q Agreed Order Dock on No. 2 e i	et No. 2018-	
				00,2,1,0,2	, eraering rierie			
	Violatio	n Description	tanks. Specifically,	the liquid amr River Municipa	nonium sulfate ("	for all liquid chemica LAS") storage contain ooster station, and Po nment.	ners at the	
						Ba	ise Penalty	\$1,000
>> En	vironme	ntal, Prope	rty and Human I		rix			
		Release		<b>arm</b> derate M	inor			
OR		Actual						
		Potential		х		Percent 15.0%	6	
>>Pro	aramma	tic Matrix						
22110	granna	Falsification	Major Mo	derate M	inor		_	
						Percent 0.0%	6	
	Matrix Notes		ovide adequate contai cant amount of conta	minants which				
					A	djustment	\$850	
								¢150
							L	\$150
Violati	ion Even	ts						
		Number of \	violation Events	1	46	Number of violatio	n davs	
					<u> </u>		,	
			daily weekly					
			monthly					
			quarterly	x		Violation Ba	se Penalty	\$150
			semiannual annual					
			single event					
			-	'				
		One quarter	ly event is recommer Docket No. 2018-0				eed Order	
Good P	Faith Eff	orts to Com	ply	10.0%			Reduction	\$15
			Before I		NOV to EDPRP/Settle	ment Offer	Reddetion	+10
			Extraordinary		~	_		
			Ordinary N/A		Х			
				Respondent a	achieved complian 2021.	nce on September 2,		
			<u>L</u>			Violatio	 on Subtotal	\$135
Econor	mic Bene	efit (EB) for	this violation			Statutory Lim	it Test	
					¢440		_	1100
		Estimate	ed EB Amount		\$448	Violation Final Pe	naity Iotal	\$186

	E	conomic	Benefit	Wor	<b>ksheet</b>		
Respondent	City of Post (P	CW No. 1)					
Case ID No.	56405						
leg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		արիւչ				<b>Percent Interest</b>	Depreciation
VIOLATION NO.	, 4						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings	-			0.00	\$0	\$0	\$0
Other (as needed)	\$3,000	16-Jul-2019	2-Sep-2021	2.13	\$21	\$427	\$448
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	40	1	
				0.00	\$0	n/a	\$0
Other (as needed)	The delayed	d cost includes the	e estimated amo	0.00	\$0	n/a n/a	\$0
Other (as needed) Notes for DELAYED costs	,		rom the effectiv	0.00 ount to p e date o	\$0 provide adequate d	n/a	\$0 s for the LAS
	storage conta	iners, calculated f	rom the effectiv to the	0.00 ount to p date of date of	\$0 provide adequate of f TCEQ Agreed Or compliance.	n/a	\$0 s for the LAS 8-0972-PWS-E
Notes for DELAYED costs	storage conta	iners, calculated f	rom the effectiv to the	0.00 ount to p re date of date of	\$0 provide adequate of f TCEQ Agreed Or compliance.	n/a containment facilitie rder Docket No. 201	\$0 s for the LAS 8-0972-PWS-E
Notes for DELAYED costs	storage conta	iners, calculated f	rom the effectiv to the	0.00 ount to p date of date of tering 0.00 0.00	\$0 provide adequate of of TCEQ Agreed Or compliance. item (except for \$0 \$0	n/a containment facilitie der Docket No. 201 <b>r one-time avoide</b> \$0 \$0	\$0 s for the LAS 8-0972-PWS-E <b>1 costs)</b> \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	storage conta	iners, calculated f	rom the effectiv to the	0.00 ount to p date of date of tering 0.00 0.00	\$0 provide adequate of of TCEQ Agreed Or compliance. item (except for \$0 \$0 \$0	n/a containment facilitie der Docket No. 201 one-time avoided \$0 \$0 \$0	\$0 s for the LAS 8-0972-PWS-E d costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	storage conta	iners, calculated f	rom the effectiv to the	0.00 ount to p date of date of 0.00 0.00 0.00 0.00	\$0 provide adequate of of TCEQ Agreed Or compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a containment facilitie der Docket No. 201 <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0	\$0 s for the LAS 8-0972-PWS-E <b>1 costs)</b> \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	storage conta	iners, calculated f	rom the effectiv to the	0.00 ount to p date of date of 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 provide adequate of of TCEQ Agreed Or compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a containment facilitie der Docket No. 201 cone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 s for the LAS 8-0972-PWS-E 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	storage conta	iners, calculated f	rom the effectiv to the	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 provide adequate of of TCEQ Agreed Or compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a containment facilitie der Docket No. 201 cone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 s for the LAS 8-0972-PWS-E 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	storage conta	iners, calculated f	rom the effectiv to the	0.00 ount to p date of date of 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 provide adequate of of TCEQ Agreed Or compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a containment facilitie der Docket No. 201 cone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 s for the LAS 8-0972-PWS-E <b>1 costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	storage conta	iners, calculated f	rom the effectiv to the	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 provide adequate of of TCEQ Agreed Or compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a containment facilitie der Docket No. 201 cone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 s for the LAS 8-0972-PWS-E 3 5 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Dat		Docket No. 2021-0978-PWS-E	PCW
	t City of Post (PCW No. 1)	· · · · · · · · · · · · · · · · · · ·	Policy Revision 5 (January 28, 2021)
Case ID No Reg. Ent. Reference No			PCW Revision February 11, 2021
	a Public Water Supply		
Enf. Coordinato			
Violation Numb			
Rule Cite(		42(e)(7)(C) and TCEQ Agreed Order Docket No. 20	)18-
	0972-P	WS-E, Ordering Provision No. 2.e.ii	
Violation Descriptio	n to be added to the wat	aps at locations that allow for the chlorine and amm er to form monochloramine as the primary species. vas installed ahead of injection at the tank battery s	
		Base Per	nalty \$1,000
>> Environmental, Prop	erty and Human Health	Matrix	
	Harm		
OR Actu		Minor	
Potent		Percent 15.0%	
	<u> </u>		
>>Programmatic Matrix		Minor	
Falsificatio	n Major Moderate	Minor Percent 0.0%	
	customers to a significant amo	e ability to determine appropriate dosing rates and bunt of contaminants which would not exceed levels ive of human health	
		Adjustment	\$850
			\$150
			φ100
Violation Events			
Number o	f Violation Events 1	46 Number of violation days	
	daily		
	weekly monthly		
	quarterly x	Violation Base Per	nalty \$150
	semiannual		
	annual		
	single event	<u>1</u>	
One quar		lculated from the effective date of TCEQ Agreed On S-E, July 16, 2019, to August 31, 2019.	der
Good Faith Efforts to Co	mply 10.0%	Redu	ction \$15
		NOE/NOV to EDPRP/Settlement Offer	410
	Extraordinary		
	Ordinary	X	
	N/A		
	Notes The Respor	adent achieved compliance on September 2, 2021.	
		Violation Sub	total \$135
Economic Benefit (EB) f	or this violation	Statutory Limit Tes	st
Estim	ted EB Amount	\$149 Violation Final Penalty	Fotal \$186
		lation Final Assessed Penalty (adjusted for lir	nits) \$186

	E	conomic	Benefit	IoW	<b>ksheet</b>		
Respondent	City of Post (P	CW No. 1)					
Case ID No.	56405						
Reg. Ent. Reference No.	RN101421519	)					
	Public Water S						Years of
Violation No.	5					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
p							
Delayed Costs							
Equipment	ľ			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$1,000	16-Jul-2019	2-Sep-2021	2.13	\$7	\$142	\$149
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	locations t	hat allow for the c	hlorine and am	monia to	be added to the	sampling tap (\$1,0 water to form mono	ochloramine,
	calculated	from the effective	date of TCEQ A	-		018-0972-PWS-E t	o the date of
		<del></del>		complia			
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 Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
other (us needed)		1		0.00	ΨŪ	ΨŪ	<b>40</b>
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,000			TOTAL		\$149

Polic	P Revision 5 (January .	-	alculatio	n Worksł	neet (PC	-	vision February 11, 202	21
DATES Assigne	26-Jul-2021							
PC	<b>W</b> 27-Jul-2021	Screening	27-Jul-2021	EPA Due				
RESPONDENT/FAC								
Responde	nt City of Post (PC	CW No. 2)						
Reg. Ent. Ref. N Facility/Site Regio				Major/M	linor Source	Major		
				1.14301711				_
CASE INFORMATIO				N -		10		
Enf./Case ID N Docket N	<b>o.</b> 2021-0978-PW	'S-F		NO. C	of Violations Order Type			
Media Program(		-		Government				
Multi-Med		11.7		Enf.		Epifanio Villari		
Admin. Penalty	¢ Limit Minimun	<b>1</b> \$50	Maximum	\$5,000	EC's Team	Enforcement T	eam 8	
Autiliii. Penalty		\$30	Maximum	\$3,000				_
		Penal	ty Calculat	tion Section	on			
TOTAL BASE PEI	NALTY (Sum o		•		-	Subtotal 1	\$104,30	0
	-						. ,	_
ADJUSTMENTS (	+/-) TO SUB e obtained by multiplyi	<b>FOTAL 1</b>	Penalty (Subtotal 1	) by the indicated r	ercentage.			
Compliance		ing the rotal base	34.0%	Adjustment	-	tals 2, 3, & 7	\$35,46	2
Not	es Enhancement		/s with dissimila aining a denial c		l one agreed			
Culpability	No		0.0%	Enhancement		Subtotal 4	\$	0
Not	es The R	Respondent doe	es not meet the	culpability crite	eria.		·	
Good Faith I	ffort to Comply	Total Adjusti	ments			Subtotal 5	-\$1,41	4
Economic B	enefit		0.0%	Enhancement*		Subtotal 6	\$	0
Estima	Total EB Amount ted Cost of Complianc		*Capped	l at the Total EB \$ ,	Amount		· · · · · ·	
SUM OF SUBTOT	ALS 1-7				F	inal Subtotal	\$138,34	8
OTHER FACTORS			TDE	0.0%		Adiustassast	¢	0
Reduces or enhances the F				0.0%		Adjustment	ዋ	-
Notes								
					Final Per	nalty Amount	\$138,34	8
STATUTORY LIM	IT ADJUSTME	INT			Final Asse	ssed Penalty	\$138,34	8
DEFERRAL				0.0%	Reduction	Adjustment	\$	0
Reduces the Final Assessed	Penalty by the indicat	ted percentage.					<u>т</u>	
Notes	No	deferral is rec	commended for	Findings Orders	5.			
PAYABLE PENAL	ТҮ					-	\$138,34	8

Reg	. Ent. Refer	ence No. RN101421519								
	Enf Coo	Media Public Water Supply ordinator Epifanio Villarreal								
	EIII. C00									
Compliance History Worksheet >> Compliance History Site Enhancement (Subtotal 2)										
	Component	Number of	Number	Adjust.						
	NOVs	ritten notices of violation ("NOVs") with same or similar violations as those in 0 0%								
		ner written NOVs 7 14%								
		Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )								
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%						
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%						
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%						
	Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%						
	Emissions	Chronic excessive emissions events (number of events)	0	0%						
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%						
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%						
		Environmental management systems in place for one year or more	No	0%						
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%						
		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) 34%						
>> Re	peat Violator	(Subtotal 3)								
	N/A		centage (Sub	ototal 3) 0%						
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)								
	Satisfactory I		centage (Sub	ototal 7) 0%						
>> Co	mpliance Hist	ory Summary								
	Compliance History Notes									
		Total Compliance History Adjustment Percentage (S	Subtotals 2.	<b>3, &amp; 7)</b> 34%						
>> Fina	al Compliance	History Adjustment								
		Final Adjustment Percenta	age *capped	at 100% 34%						

**Docket No.** 2021-0978-PWS-E

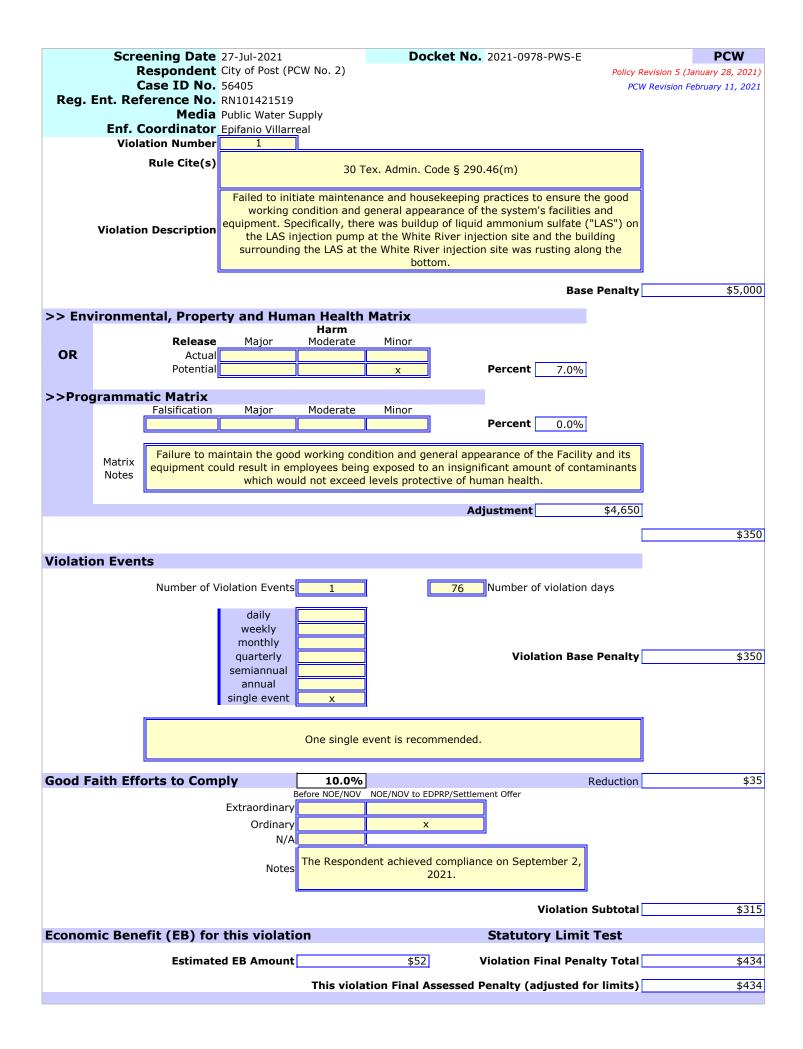
Screening Date 27-Jul-2021

**Case ID No.** 56405

Respondent City of Post (PCW No. 2)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021



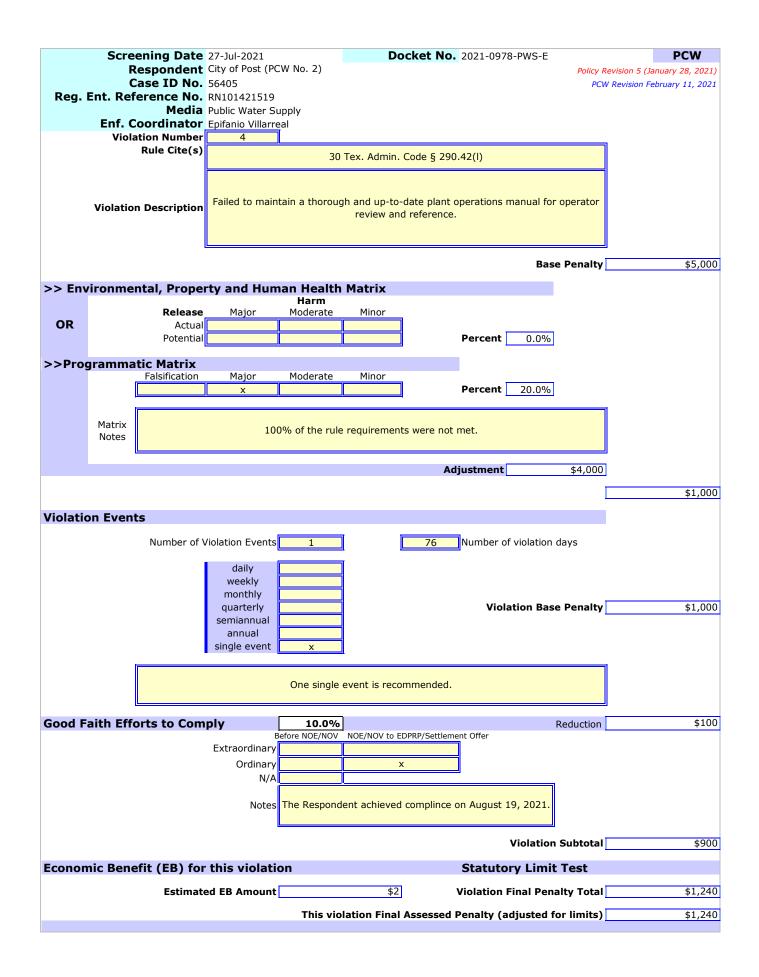
	E	conomic	Benefit	Wo	rksheet		
Respondent		CW No. 2)					
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S	Supply				Percent Interest	Years of
Violation No.	1						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$500	12-May-2021	2-Sep-2022	1.31	\$2	\$44	\$46
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Training/Sampling Remediation/Disposal				0.00	\$0	n/a n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other	\$500	12-May-2021	2-Aug-2021	0.22	\$6	n/a	\$6
Notes for DELAYED costs	White River i	njection site build layed cost include	ing, calculated fissed for a sthe estimated	rom the amount	e date of the invest to remove the bu	remove or repair th igation to the date ildup of LAS on the gation to the date o	of compliance.
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				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							

Screening Date		Docket No. 2021-0978-PWS-E	PCW
	City of Post (PCW No. 2)	Policy I	Revision 5 (January 28, 2021)
Case ID No Reg. Ent. Reference No		PCI	N Revision February 11, 2021
-	Public Water Supply		
Enf. Coordinato			
Violation Numbe			
Rule Cite(s	) 30 Tey	x. Admin. Code § 290.42(e)(4)(C)	
		ventilation, which includes both high level and floor level s, a fan which is located at and draws air in through the	
Violation Description	ton yent and discharges to t	he outside atmosphere through the floor level vent, and	
Violation Description	a fan switch located outside,	for enclosures containing more than one operating 150	
		specifically, the fan for the chlorinator room at the White er injection site was inoperable.	
			1
		Base Penalty	\$5,000
>> Environmental, Prope	arty and Human Health	Matrix	
>> Environmental, Prope	Harm		
Release		Minor	
OR Actua Potentia		Percent 30.0%	
Totentie			
>>Programmatic Matrix			
Falsification	Major Moderate	Minor	
		<b>Percent</b> 0.0%	
			1
		could expose employees to contaminants which would protective of human health.	
Notes	exceed levels p		
		Adjustment \$3,500	7
		Adjustment \$3,500	]
			\$1,500
Violation Events			
Number of	Violation Events 3	76 Number of violation days	
	daily	1	
	weekly		
	monthly x		
	quarterly semiannual	Violation Base Penalty	\$4,500
	annual		
	single event		
			ล
Three mon	hly events are recommended,	calculated from the date of the investigation, May 12,	
	2021, to the dat	e of screening, July 27, 2021	
Good Faith Efforts to Con	nply 0.0% Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	\$0
	Extraordinary		
	Ordinary		
	N/A x		
	The Respond	lent does not meet the good faith criteria for	
	Notes	this violation.	
		Violation Subtotal	\$4,500
Economic Benefit (EB) fo	r this violation	Statutory Limit Test	
	ted EB Amount	\$14 Violation Final Penalty Total	\$6,030
Lotina	<u></u>		
	This vio	lation Final Assessed Penalty (adjusted for limits)	\$6,030

	E	conomic	Benefit	Nor	·ksheet		
Respondent	City of Post (P	CW No. 2)					
Case ID No.	56405	,					
Reg. Ent. Reference No.							
							Years of
	Public Water S	ырріу				Percent Interest	Depreciation
Violation No.	2						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l i i i i i i i i i i i i i i i i i i i						
Delayed Costs							
Equipment	\$250	12-May-2021	15-Feb-2022	0.76	\$1	\$13	\$14
Buildings	\$230	12-May-2021	13-160-2022	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
Permit Costs Other (as needed)	The delayed	cost includes the	estimated amou	0.00	\$0	n/a n/a	\$0 \$0
	the chlorinato	r room at the Whi	ite River injectio c	0.00 unt to re n site, c of comp	\$0 pair or replace the alculated from the iance.	n/a e forced air ventilat e date of the investi	\$0 \$0 ion system for gation the date
Other (as needed)	the chlorinato	r room at the Whi	ite River injectio c	0.00 Int to rend n site, co of complete tering	\$0 pair or replace the calculated from the iance. item (except for	n/a e forced air ventilat e date of the investi	\$0 \$0 ion system for gation the date d costs)
Other (as needed) Notes for DELAYED costs	the chlorinato	r room at the Whi	ite River injectio c	0.00 Int to rend n site, configuration of completion tering 0.00	\$0 pair or replace the calculated from the iance. item (except for \$0	n/a e forced air ventilat e date of the investi one-time avoide \$0	\$0 \$0 ion system for gation the date d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	the chlorinato	r room at the Whi	ite River injectio c	0.00 unt to re n site, c of compl tering 0.00 0.00	\$0 pair or replace the calculated from the iance. item (except for \$0 \$0	n/a e forced air ventilat e date of the investi one-time avoide \$0 \$0	\$0 \$0 ion system for gation the date d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	the chlorinato	r room at the Whi	ite River injectio c	0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 pair or replace the alculated from the iance. item (except for \$0 \$0 \$0	n/a e forced air ventilat date of the investi one-time avoide \$0 \$0 \$0	\$0 \$0 ion system for gation the date d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	the chlorinato	r room at the Whi	ite River injectio c	0.00 unt to re n site, c of comp tering 0.00 0.00 0.00 0.00	\$0 pair or replace the alculated from the iance. item (except for \$0 \$0 \$0 \$0 \$0	n/a e forced air ventilat date of the investi one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 on system for gation the date d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	the chlorinato	r room at the Whi	ite River injectio c	0.00 Int to re n site, co of comp tering 0.00 0.00 0.00 0.00	\$0 pair or replace the alculated from the iance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e forced air ventilat date of the investi one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 on system for gation the date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	the chlorinato	r room at the Whi	ite River injectio c	0.00 unt to re n site, c of comp tering 0.00 0.00 0.00 0.00 0.00	\$0 pair or replace the alculated from the iance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e forced air ventilat date of the investi one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 on system for gation the date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	the chlorinato	r room at the Whi	ite River injectio c	0.00 Int to re n site, co of comp tering 0.00 0.00 0.00 0.00	\$0 pair or replace the alculated from the iance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e forced air ventilat date of the investi one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 gation system for gation the date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	the chlorinato	r room at the Whi	ite River injectio c	0.00 unt to re n site, c of comp tering 0.00 0.00 0.00 0.00 0.00	\$0 pair or replace the alculated from the iance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a e forced air ventilat date of the investi one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 ion system for gation the date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	ng Date 27-Jul-2021	Docket No. 2021-0978-PWS-E	PCW
	City of Post (PCW No. 2)		Revision 5 (January 28, 2021)
	ID No. 56405 nce No. RN101421519	PCV	W Revision February 11, 2021
	Media Public Water Supply		
Enf. Coord	dinator Epifanio Villarreal		
Violation			
Rule	e Cite(s) 30	Tex. Admin. Code § 290.46(m)(1)(A)	
Violation Des	scription Failed to inspect the Facili	ity's one million-gallon ("MG") ground storage tank ("GST") annually.	
		Base Penalty	\$5,000
	Descetty and Human Haal	the Maduit	
>> Environmental	, Property and Human Heal Harm		
	Release Major Moderat	e Minor	
OR	Actual Actual Actual	Percent 15.0%	
	Potential x		
>>Programmatic			
Fals	sification Major Moderat		
		<b>Percent</b> 0.0%	
F	ailure to inspect the GST on an annu	al basis could cause non-detection of defects and could	
Matrix	pose persons served by the Facility	to a significant amount of contaminants which would not	
	exceed leve	els protective of human health.	
		Adjustment \$4,250	1
			\$750
Violation Events			
Ni	umber of Violation Events	76 Number of violation days	
	daily		
	weekly monthly	_	
	quarterly	Violation Base Penalty	\$750
	semiannual		
	annual	_	
	single event <u>x</u>		
	One sing	gle event is recommended.	
			4
<b>Good Faith Efforts</b>	to Comply 25.0		\$187
	Before NOE/N Extraordinary	OV NOE/NOV to EDPRP/Settlement Offer	
	Ordinary x		
	N/A		
	Notes The Resp	pondent achieved compliance on June 9, 2021.	
		Violation Subtotal	\$563
Economic Benefit (	(EB) for this violation	Statutory Limit Test	
	Estimated EB Amount	\$0 Violation Final Penalty Total	\$818
		violation Final Assessed Penalty (adjusted for limits)	

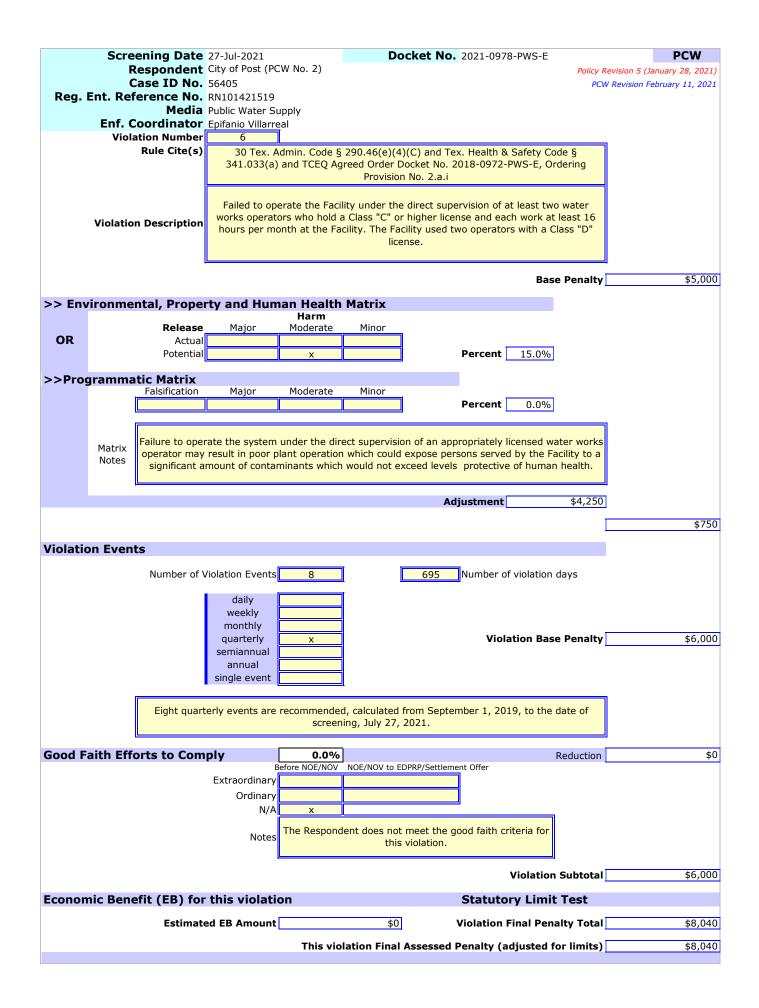
	E	conomic	Benefit	IoW	<b>ksheet</b>		
Respondent	City of Post (P	CW No. 2)					
Case ID No.		,					
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		Juppiy				Percent Interest	Depreciation
Violation No.	3						-
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest 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)	\$41	16-Mar-2021	9-Jun-2021	0.23	\$0	n/a	\$0
Notes for DELAYED costs	ť	ank), calculated fr	rom the date the	e inspec	tion was due to th	ST inspection (\$41 e date of complianc	e.
Avoided Costs	ANNU	ALIZE avoided c	osts before en		<u> </u>	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
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$41			TOTAL		\$0



	E	conomic	Benefit	Woi	rksheet		
Respondent	City of Post (P	CW No. 2)					
Case ID No.		/					
Reg. Ent. Reference No.		1					
							Verse of
	Public Water S	supply				<b>Percent Interest</b>	Years of
Violation No.	4						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Ttem Description							
Delayed Costs							
Delayed Costs		1		0.00	\$0	±0	\$0
Equipment				0.00	\$0	\$0	\$0 \$0
Buildings Other (as needed)				0.00	\$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0		\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	12-May-2021	19-Aug-2021	0.27	\$2	n/a	\$2
Notes for DELAYED costs		manual, calculate	d from the date	of the i	nvestigation to the	and up-to-date pla date of compliance	2.
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		\$180			TOTAL		\$2

	Screening			<b>Docket No.</b> 2021-0978-PWS-E	PCW
	Respo Case I		City of Post (PCW No. 2) 56405		Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021
Reg.	Ent. Reference	ce No.	RN101421519		
			Public Water Supply		
	Violation N		Epifanio Villarreal		
		Cite(s)		x. Admin. Code § 290.110(c)(4)(B)	
			50 16.	X. Admin. Code § 230.110(C)(4)(D)	
	Violation Desc	cription		sinfectant residual at representative locations in th ution system at least once per day.	e
				Base Pe	enalty \$5,000
>> En	vironmental,	Prope	rty and Human Health	n Matrix	
	R	Release	Harm Major Moderate	Minor	
OR		Actual			
	P	Potential	X	<b>Percent</b> 30.0%	
>>Pro	grammatic Ma	atrix			
		fication	Major Moderate	Minor	
				Percent 0.0%	
	Fail	ire to m	onitor the disinfectant residu	al at representative locations in the distribution sys	tem
				ty to contaminants which would exceed levels prote	
	Notes		O	f human health.	
				Adjustment \$	3,500
					\$1,500
					φ1,500
Violati	on Events				
	Nun	mber of \	/iolation Events 3	76 Number of violation days	3
			daily weekly monthly		
			quarterly semiannual annual single event	Violation Base Pe	e <b>nalty</b> \$4,500
	Thre	ee month	,	, calculated from the date of the investigation, May e of screening, July 27, 2021.	12,
Good F	Faith Efforts t	o Com			uction \$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A x		
			Notes The Respon	dent does not meet the good faith criteria for this violation.	
				Violation Sub	btotal \$4,500
Econo	mic Benefit (E	EB) for	this violation	Statutory Limit Te	st
	E	Estimate	ed EB Amount	\$11 Violation Final Penalty	<b>Total</b> \$6,030
			This vi	blation Final Assessed Penalty (adjusted for li	mits) \$6,030
			1115 VI	station - mar Assessed renaity (aujusted for m	φ0,050

	E	conomic	Benefit	Woi	rksheet		
Respondent							
Case ID No.	, ,	/					
Reg. Ent. Reference No.							
							Verseef
	Public Water S	supply				<b>Percent Interest</b>	Years of
Violation No.	5						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Cente							
Delayed Costs Equipment		1 1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction		1		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	12-May-2021	1-Aug-2022	1.22	\$1	n/a	\$1
Notes for DELAYED costs	(\$10 per mo	nitoring), calculat	ed from the dat	e of the	e investigation to	ant residual at leas the estimated date	of compliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before en		· · ·	one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance	<b>#10</b>	12 May 2021	27 1.1 2021	0.00	\$0	\$0	\$0
ONE-TIME avoided costs	\$10	12-May-2021	27-Jul-2021	0.21	\$0 \$0	\$10	\$10
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs						ant residual at leas to the screening da	
Approx. Cost of Compliance		\$20			TOTAL		\$11



	E	conomic	Benefit	Wor	<b>ksheet</b>		
Respondent Case ID No. Reg. Ent. Reference No.	56405	-					
Media Violation No.	Public Water S 6	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	[ <u></u>	-1		-	1	r	
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	<u>\$0</u> \$0
Record Keeping System				0.00	<u>\$0</u> \$0	n/a n/a	\$0
Training/Sampling Remediation/Disposal				0.00	\$0	· · · · · · · · · · · · · · · · · · ·	\$0
Permit Costs				0.00	\$0	n/a n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs		ALLIZE avoided a	acts hoforo or	toring	itom (ovcont for	one-time avoided	( costs)
	ANNO		USIS DEIDIE EI	0.00	\$0	\$0	\$0
Disposal Personnel				0.00	\$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs						hold a Class "C" lic No. 1 of PCW No. 1	ense or higher
Approx. Cost of Compliance		\$0			TOTAL		\$0

		ening Date		Docket N	<b>0.</b> 2021-0978-PWS-E		PCW
		espondent ase ID No.	City of Post (PCW No. 2)			Policy Revision 5 (Ja	anuary 28, 2021) ebruary 11, 2021
Reg.			RN101421519			PCW REVISION P	ebiuary 11, 2021
			Public Water Supply				
		oordinator	Epifanio Villarreal				
	VIOIA	Rule Cite(s)					
		11210 0100(0)	SU TEX. Authin. Coue g Ze		I), (f)(3)(A)(iii), and (f)(3)(/ /S-E, Ordering Provision No.		
					ntenance records and make ng the investigation. Specific		
	Violatio	1 Description			ach day, the date, location, a		
			nature of water quality, pl		aints received by the systen tion records, and dates the c		
			· · ·	flushed were not mainta			
			<u> </u>				+F 000
					Base Pe	nalty	\$5,000
>> Env	vironme	ntal, Prope	rty and Human Healt	th Matrix			
		Release	Harm Major Moderate	Minor			
OR		Actual					
		Potential			Percent 0.0%		
>>Pro	gramma	tic Matrix					
		Falsification	Major Moderate		Barrant d 00%		
	1			X	Percent 1.0%		
	Matrix Notes		At least 70% of	the rule requirements w	ere met.		
					Adjustment \$	4,950	
							\$50
							430
Violati	on Event	S					
		Number of V	violation Events 1	742	Number of violation days	5	
			daily				
			weekly				
			monthly			-	
			quarterly semiannual	_	Violation Base Pe	nalty	\$50
			annual	-			
			single event x				
	1						
			One sing	le event is recommended	J.		
	l						
Good F	aith Effo	orts to Com				uction	\$5
			Before NOE/NO	NOE/NOV to EDPRP/Settle	ement Offer		
			Ordinary	X			
			N/A				
			The Res	oondent achieved compli	ance on January 27,		
			Notes	2022.			
			<u> </u>				
					Violation Sub	ototal	\$45
Econor	nic Bene	fit (EB) for	this violation		Statutory Limit Te	st	
		Estimate	ed EB Amount	\$6	Violation Final Penalty	Total	\$62
			L	<u>·</u>		·	
				Internet Arrest	d Penalty (adjusted for li		\$62

Economic Benefit Worksheet								
Respondent	City of Post (P	CW No. 2)						
Case ID No.	56405							
Reg. Ent. Reference No.	RN101421519	1						
	Public Water S					Percent Interest	Years of	
Violation No.	7					Percent Interest	Depreciation	
						5.0	15	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount	
Item Description								
Delayed Costs								
Equipment				0.00	\$0	\$0	\$0	
Buildings				0.00	\$0	\$0	\$0	
Other (as needed)				0.00	\$0	\$0	\$0	
Engineering/Construction				0.00	\$0	\$0	\$0	
Land				0.00	\$0	n/a	\$0	
Record Keeping System	\$45	16-Jul-2019	27-Jan-2022	2.54	\$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 an	id make them imr	nediately availal	ole for ir	nspection upon req	tem operation and uest by the Execut	ive Director,	
	calculated	from the effective	e date of TCEQ A	-		018-0972-PWS-E to	o the date of	
			a ata haɗana an	complia		ana tina avaida	d as at a )	
Avoided Costs	ANNU	ALIZE avoided C	costs defore er	_	<u> </u>	one-time avoide	-	
Disposal				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
Personnel Inspection/Reporting/Sampling				0.00	\$0	<u>\$0</u> \$0	\$0	
Supplies/Equipment				0.00	\$0	\$0	\$0	
Financial Assurance				0.00	\$0	\$0	\$0	
ONE-TIME avoided costs				0.00	\$0	\$0	\$0	
Other (as needed)				0.00	\$0	\$0	\$0	
Notes for AVOIDED costs								
Approx. Cost of Compliance		\$45			TOTAL		\$6	

Screening Date		Docket No. 2021-0978-PWS-E	PCW
	City of Post (PCW No. 2)		Policy Revision 5 (January 28, 2021)
Case ID No Reg. Ent. Reference No			PCW Revision February 11, 2021
	Public Water Supply		
Enf. Coordinato			
Violation Numbe			
Rule Cite(s		.46(m)(1)(B) and TCEQ Agreed Order Docket No. WS-E, Ordering Provision No. 2.a.iv	2018-
Violation Description	Failed to conduct an inspecti	ion of the interior of the Facility's 0.01 MG pressu	re tank
		Base P	enalty \$5,000
>> Environmental, Prope	erty and Human Health	Matrix	
Delese	Harm Major Medarata	Minor	
OR Actua		Minor	
Potentia		Percent 30.0%	
	<u>pn</u>	······································	
>>Programmatic Matrix Falsification	Major Moderate	Minor	
raisincation		Percent 0.0%	
		i	
Matrix	loss of tank integrity and coul	's pressure tank could result in non-detection of of d expose persons served by the Facility to contar levels protective of human health.	
		Adjustment	\$3,500
		Agustilient	
			\$1,500
Violation Events			
Number of	Violation Events 1	742 Number of violation day	V/S
			13
	daily		
	weekly monthly		
	quarterly	Violation Base P	Penalty \$1,500
	semiannual		-
	annual	-	
	single event <u>x</u>	1	
	One single	event is recommended.	
Good Faith Efforts to Cor			duction \$150
	Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
	Ordinary	×	
	N/A		
	The Respo	ondent achieved compliance on August 26,	
	Notes	2021.	
		Violation Su	<b>ubtotal</b> \$1,350
Economic Benefit (EB) fo	r this violation	Statutory Limit T	est
Estima	ted EB Amount	\$49 Violation Final Penalty	<b>y Total</b> \$1,860
			-
	This vio	lation Final Assessed Penalty (adjusted for	limits) \$1,860

	E	conomic	Benefit	Wor	rksheet		
Respondent	t City of Post (P	CW No. 2)					
Case ID No.	56405						
Reg. Ent. Reference No.							
5	Public Water S						Years of
Violation No.		supply				<b>Percent Interest</b>	Depreciation
Violation No.	. 8						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	ı						
Delayed Costs	-						
Equipment	• 			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
<b>Remediation/Disposal</b>				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$41	16-Jul-2019	26-Aug-2021	2.12	\$4	n/a	\$4
	The delayed	l costs include the	estimated amo	unt to ir	nspect the interior	surface of the 0.01	MG pressure
Notes for DELAYED costs			, calculated from	n the ef		surface of the 0.01 EQ Agreed Order Do	
Notes for DELAYED costs	tank (\$41 per	tank x one tank),	calculated from 0972-PWS-E	n the ef to the c	fective date of TCE date of compliance	EQ Agreed Order Do	ocket No. 2018-
	tank (\$41 per	tank x one tank),	calculated from 0972-PWS-E	n the ef to the c	fective date of TCE date of compliance item (except for \$0	EQ Agreed Order Do one-time avoided \$0	cket No. 2018- i costs) \$0
Avoided Costs	tank (\$41 per	tank x one tank),	calculated from 0972-PWS-E	n the ef to the c tering 0.00	fective date of TCE date of compliance item (except for \$0 \$0	EQ Agreed Order Do one-time avoided \$0 \$0	cket No. 2018 I costs) \$0 \$0
Avoided Costs Disposal Personnel	tank (\$41 per	tank x one tank),	calculated from 0972-PWS-E	n the ef to the c tering 0.00 0.00 0.00	fective date of TCE date of compliance item (except for \$0 \$0 \$0	Q Agreed Order Do one-time avoided \$0 \$0 \$0	cket No. 2018 i costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	tank (\$41 per	tank x one tank),	calculated from 0972-PWS-E	n the ef to the c tering 0.00 0.00 0.00	fective date of TCE date of compliance item (except for \$0 \$0 \$0 \$0	Q Agreed Order Do one-time avoided \$0 \$0 \$0 \$0 \$0	cket No. 2018 i costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	tank (\$41 per	tank x one tank), ALIZE avoided c	, calculated fror 0972-PWS-E tosts before en	to the ef to the c 0.00 0.00 0.00 0.00 0.00	fective date of TCE date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Q Agreed Order Do one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2018 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	tank (\$41 per	tank x one tank),	calculated from 0972-PWS-E	n the ef to the c 0.00 0.00 0.00 0.00 0.00 0.00 2.03	fective date of TCE date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	EQ Agreed Order Do one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2018- 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	tank (\$41 per	tank x one tank), ALIZE avoided c	, calculated fror 0972-PWS-E tosts before en	to the ef to the c 0.00 0.00 0.00 0.00 0.00	fective date of TCE date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Q Agreed Order Do one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2018 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	tank (\$41 per	tank x one tank), ALIZE avoided c	<ul> <li>calculated fror 0972-PWS-E</li> <li>costs before en</li> <li>27-Jul-2021</li> <li>estimated amo</li> <li>calculated fror</li> </ul>	n the ef to the c tering 0.00 0.00 0.00 2.03 0.00 unt to in n the ef	fective date of TCE date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	EQ Agreed Order Do one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2018 1 costs) \$0 \$0 \$0 \$0 \$0 \$45 \$0 MG pressure
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	tank (\$41 per	tank x one tank), ALIZE avoided c	<ul> <li>calculated fror 0972-PWS-E</li> <li>costs before en</li> <li>27-Jul-2021</li> <li>estimated amo</li> <li>calculated fror</li> </ul>	n the ef to the c tering 0.00 0.00 0.00 2.03 0.00 unt to in n the ef	fective date of TCE date of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$4 \$0 pspect the interior fective date of TCE	Q Agreed Order Do one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	cket No. 2018- \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Respondent Case ID No	27-Jul-2021		Doc	ket No. 2021-0978-F	PWS-E	PCW
	City of Post (PC	CW No. 2)				evision 5 (January 28, 2021)
Reg. Ent. Reference No					PCW	Revision February 11, 2021
	Public Water Su	ylagu				
Enf. Coordinato						
Violation Number						
Rule Cite(s)	30 Tex. Admi			TCEQ Agreed Order Do	ocket No. 2018-	
	Eailed to have			Provision No. 2.a.v.	allation and on an	
Violation Description	annual basis t operating wit conducted fo Correctional	by a recognize thin specificati or the Garza C Facility were i	d backflow ass ons. Specifica ounty Clinic, H ncorrectly test	mblies tested upon insta embly tester and certifi ily, backflow prevention udman Funeral Home, a ed while backflow preve and Holly's Drive-In we	ed that they are assembly tests and Giles Dalby ention assembly	
					Base Penalty	\$5,000
>> Environmental, Prope	erty and Hum	nan Health	Matrix			
Release	Maiau	Harm	Minor			
OR Actua		Moderate	MIIIOr			
Potentia				Percent	30.0%	
	,					
>>Programmatic Matrix	Major	Madarata	Minor			
Falsification	Major	Moderate	Minor	Percent	0.0%	
		II			0.070	
Matrix	properly which co	uld result in a	reverse flow o	ual basis would not ens f contaminants entering tive of human health.		
				Adjustment	\$3,500	
						¢1 500
					L	\$1,500
Violation Events						
Number of	Violation Events	23		695 Number of vi	iolation days	
Number of	Violation Events daily weekly monthly quarterly semiannual annual single event	23			iolation days on Base Penalty	\$34,500
	daily weekly monthly quarterly semiannual annual single event	x x s are recomme	ended, calculat ning, July 27,	Violati ed from September 1, 2	on Base Penalty	\$34,500
Twenty-thre	daily weekly monthly quarterly semiannual annual single event	x x s are recomme of scree		Violati ed from September 1, 2	on Base Penalty	
	daily weekly monthly quarterly semiannual annual single event	s are recomme of scree	NOE/NOV to EDF	Violati ed from September 1, 2	on Base Penalty	\$34,500
Twenty-thre	daily weekly monthly quarterly semiannual annual single event e monthly events monthly events Extraordinary Ordinary N/A	s are recomme of scree	NOE/NOV to EDF	Violati	on Base Penalty	
Twenty-thre	daily weekly monthly quarterly semiannual annual single event e monthly events e monthly events Extraordinary Ordinary N/A Notes	s are recomme of scree	NOE/NOV to EDF	Violati ed from September 1, 2 2021.  RP/Settlement Offer eet the good faith crite iolation. Vi	on Base Penalty	\$0
Good Faith Efforts to Con	daily weekly monthly quarterly semiannual annual single event e monthly events e monthly events Extraordinary Ordinary N/A Notes	s are recomme of scree 0.0% efore NOE/NOV x The Respond	NOE/NOV to EDF	Violati ed from September 1, 2 2021.  RP/Settlement Offer iolation. Vi Statutory	on Base Penalty	\$0

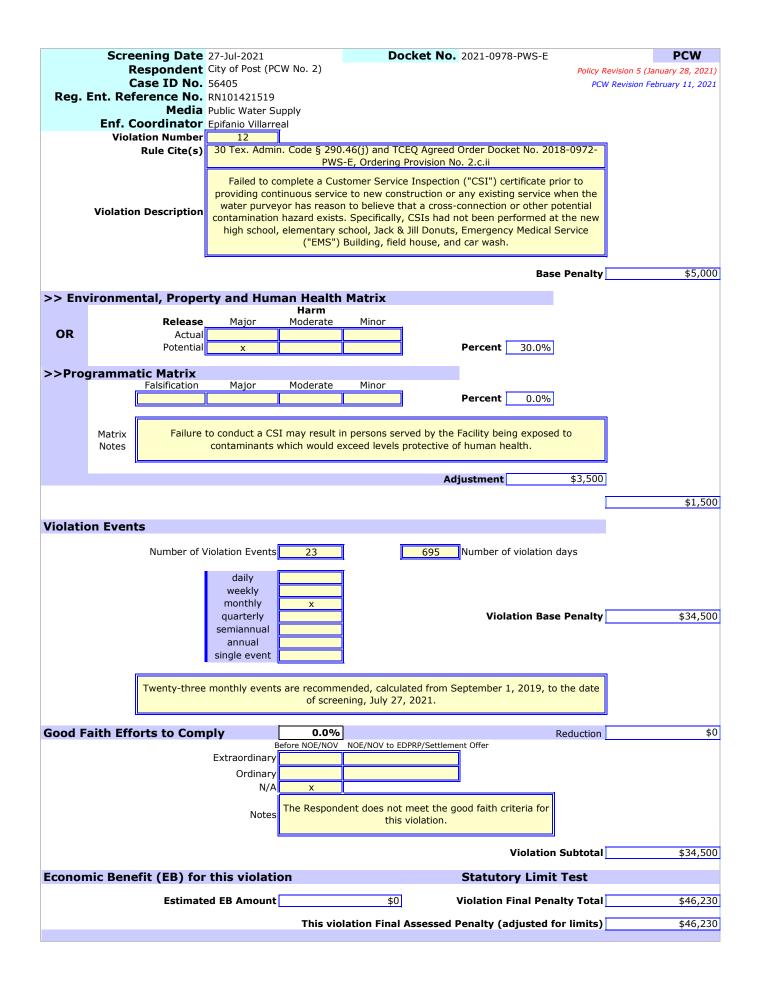
Violation No. 9 Item Description Delayed Costs Equipment Buildings	Item Cost	Date Required	Final Date			Percent Interest	Depreciation
Item Description Delayed Costs Equipment	Item Cost	Date Required	Final Date			ГО	
Item Description Delayed Costs Equipment	Item Cost	Date Required	Final Date			5.0	1
Delayed Costs				Yrs	Interest Saved	Costs Saved	EB Amount
Equipment							
Equipment							
				_			
Buildings				0.00	\$0	\$0	\$0
				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
Natas fee DELAVED seats	backflow a	comply tostor an		d upon ir	nstallation and on	t employee training an annual basis by	a recognized
Notes for DELAYED costs	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon in nat they Donalds, for Viola	nstallation and on are operating with and Holly's Drive- tion No. 2 of PCW	an annual basis by in specifications an In are captured in t No. 1.	a recognized ad to test the the Economic
Avoided Costs	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon ir nat they Donalds, for Viola	nstallation and on are operating with and Holly's Drive- tion No. 2 of PCW tem (except for	an annual basis by in specifications an In are captured in t No. 1. <b>one-time avoide</b>	a recognized of to test the the Economic d costs)
Avoided Costs Disposal	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon in nat they Donalds, for Viola <b>tering</b> i	nstallation and on are operating with and Holly's Drive- tion No. 2 of PCW tem (except for \$0	an annual basis by in specifications ar In are captured in t No. 1. <b>one-time avoide</b> \$0	a recognized of to test the the Economic d costs) \$0
Avoided Costs Disposal Personnel	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon in nat they Donalds, for Viola <b>tering</b> i 0.00	nstallation and on are operating with and Holly's Drive- tion No. 2 of PCW item (except for \$0 \$0	an annual basis by in specifications ar In are captured in t No. 1. one-time avoide \$0 \$0	a recognized ad to test the the Economic d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon in nat they Donalds, for Viola <b>tering</b> i 0.00 0.00 0.00	nstallation and on are operating with and Holly's Drive- tion No. 2 of PCW item (except for \$0 \$0 \$0	an annual basis by in specifications an In are captured in t No. 1. one-time avoide \$0 \$0 \$0	a recognized d to test the the Economic d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon ir nat they conalds, for Viola <b>tering</b> i 0.00 0.00 0.00 0.00	are operating with and Holly's Drive- tion No. 2 of PCW item (except for \$0 \$0 \$0 \$0	an annual basis by in specifications an In are captured in t No. 1. one-time avoider \$0 \$0 \$0 \$0 \$0	a recognized d to test the the Economic d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon in hat they Donalds, for Viola <b>itering</b> i 0.00 0.00 0.00 0.00 0.00	are operating with and Holly's Drive- tion No. 2 of PCW item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	an annual basis by in specifications an In are captured in t No. 1. one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	a recognized d to test the the Economic d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	backflow as	semblies for Strip Ber	d are certified thes, Allsups, McE nefit Worksheet	d upon ir nat they conalds, for Viola <b>tering</b> i 0.00 0.00 0.00 0.00	are operating with and Holly's Drive- tion No. 2 of PCW item (except for \$0 \$0 \$0 \$0	an annual basis by in specifications an In are captured in t No. 1. one-time avoider \$0 \$0 \$0 \$0 \$0	a recognized d to test the the Economic d costs) \$0 \$0 \$0 \$0 \$0

		ening Date espondent	27-Jul-2021 City of Post (PCW No. 2)	Doc	ket No. 2021-0978-PWS-E	PCW
_	С	ase ID No.	56405			PCW Revision February 11, 2021
Reg.	Ent. Ref		RN101421519 Public Water Supply			
	Enf. C		Epifanio Villarreal			
	Viola	tion Number				
		Rule Cite(s)			1 TCEQ Agreed Order Docket No. 2018 Provision No. 2.a.vi	
	Violatio	n Description			sampling to ensure that monochloram and that nitrification is controlled.	ne
					Base Pena	lty \$5,000
>> Env	vironme	ntal, Prope	rty and Human Healt	h Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual			-	
		Potential		X	Percent 7.0%	
>>Pro	gramma	tic Matrix				
		Falsification	Major Moderate	Minor	Percent 0.0%	
			ΙΝ			
	Matuit	Failure to co	onduct chloramine effectiver	ess sampling co	uld lead to excessive nitrification in the	2
	Matrix Notes				d by the Facility to be exposed to an ceed levels protective of human healtl	
		insignincant		ich would not ex		·
					Adjustment \$4,6	50
						\$350
						\$350
Violatio	on Event	s				
		Number of \	/iolation Events 1		742 Number of violation days	
			daily	 <b>-</b>		
			weekly	-		
			monthly			h.
			quarterly semiannual	-	Violation Base Pena	lty \$350
			annual			
			single event x			
			One single	e event is recom	mended.	
Good F	aith Effe	orts to Com	0.0%	6	Reduct	on \$0
			Before NOE/NO		RP/Settlement Offer	
			Extraordinary	_		
			Ordinary N/A			
			The Respor	dent does not m	neet the good faith criteria for	
			Notes		iolation.	
			<u></u>		Violation Subto	tal\$350
Econor	nic Bene	fit (EB) for	this violation		Statutory Limit Test	
			ed EB Amount	\$251	Violation Final Penalty To	tal \$469
		Estimation			-	
			This vi	olation Final A	ssessed Penalty (adjusted for limi	<b>ts)</b> \$469

		conomic	Benefit	Wor	<b>'ksheet</b>		
Respondent	City of Post (P	CW No. 2)					
Case ID No.	56405						
Reg. Ent. Reference No.		)					
	Public Water S					Percent Interest	Years of Depreciation
	10					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
	-						
Delayed Costs							
Equipment	·		1	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$200	16-Jul-2019	1-Aug-2022	3.05	\$30	n/a	\$30
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	,					n/a ectiveness samples	
Notes for DELAYED costs	monochloram effective dat	ine is the prevailine of TCEQ Agreed	ng chloramine s Order Docket N	nt to col pecies a lo. 2018	lect chloramine eff nd that nitrification -0972-PWS-E, to t	ectiveness samples n is controlled, calcu the estimated date o	to ensure that Ilated from the of compliance.
Notes for DELAYED costs Avoided Costs	monochloram effective dat	ine is the prevailine of TCEQ Agreed	ng chloramine s Order Docket N	nt to col pecies a lo. 2018	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for	ectiveness samples n is controlled, calcu the estimated date o one-time avoided	to ensure that ilated from the of compliance.
Notes for DELAYED costs Avoided Costs Disposal	monochloram effective dat	ine is the prevailine of TCEQ Agreed	ng chloramine s Order Docket N	nt to col pecies a lo. 2018 Itering	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0	ectiveness samples n is controlled, calcu the estimated date one-time avoided \$0	to ensure that ulated from the of compliance. <b>I costs)</b> \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	monochloram effective dat	ine is the prevailine of TCEQ Agreed	ng chloramine s Order Docket N	nt to col pecies a lo. 2018 Itering 0.00	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0 \$0	ectiveness samples n is controlled, calcu the estimated date of one-time avoided \$0 \$0	to ensure that llated from the of compliance. <b>I costs)</b> \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	monochloram effective dat	ine is the prevailine of TCEQ Agreed	ng chloramine s Order Docket N	nt to col pecies a lo. 2018 Itering 0.00 0.00 0.00	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0 \$0 \$0	ectiveness samples n is controlled, calcu the estimated date of one-time avoided \$0 \$0 \$0	to ensure that lated from the of compliance. <b>I costs)</b> \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	monochloram effective dat	ine is the prevailine of TCEQ Agreed	ng chloramine s Order Docket N	nt to col pecies a lo. 2018 Itering 0.00 0.00 0.00 0.00	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0 \$0 \$0 \$0 \$0	ectiveness samples n is controlled, calcu- the estimated date one-time avoided \$0 \$0 \$0 \$0 \$0	to ensure that ulated from the of compliance. f costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	monochloram effective dat	ine is the prevailine of TCEQ Agreed ALIZE avoided c	ng chloramine s Order Docket N costs before er	t to col pecies a lo. 2018 <b>Itering</b> 0.00 0.00 0.00 0.00 0.00	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	ectiveness samples n is controlled, calcu- che estimated date one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that ulated from the of compliance. f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	monochloram effective dat	ine is the prevailine of TCEQ Agreed	ng chloramine s Order Docket N	nt to col pecies a lo. 2018 <b>Itering</b> 0.00 0.00 0.00 0.00 0.00 2.03	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$21	ectiveness samples n is controlled, calcu- the estimated date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that ulated from the of compliance. f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$221
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	monochloram effective dati ANNU \$200	ine is the prevailine of TCEQ Agreed ALIZE avoided c	ng chloramine s Order Docket N costs before en 27-Jul-2021	t to col pecies a lo. 2018 <b>tering</b> 0.00 0.00 0.00 0.00 2.03 0.00	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ectiveness samples n is controlled, calcu- the estimated date of s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$200 \$0	to ensure that ulated from the of compliance. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	monochloram effective data ANNU \$200 The avoided ensure th	ALIZE avoided c ALIZE avoide c AL	ng chloramine s Order Docket N costs before er 27-Jul-2021 e estimated amo ne is the prevaili	t to col pecies a lo. 2018 tering 0.00 0.00 0.00 0.00 2.03 0.00 2.03 0.00 unt to c ng chlor	lect chloramine eff nd that nitrification -0972-PWS-E, to t item (except for \$0 \$0 \$0 \$0 \$0 \$21 \$0 ollect conduct chlo amine species and rder Docket No. 20	ectiveness samples n is controlled, calcu- the estimated date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure that ulated from the of compliance. f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Dock	et No. 2021-0978-PWS-E		PCW
			City of Post (PCW N	o. 2)				ision 5 (January 28, 2021)
Deg		ase ID No.	56405 RN101421519				PCW R	evision February 11, 2021
Reg.			Public Water Supply	,				
	Enf. C		Epifanio Villarreal					
		tion Number	11					
		Rule Cite(s)	30 Tex. Admin. Cod			reed Order Docket No. 2018-0	)972-PWS	
					Ordering Provis			
						nce, regulations, or service a sure that neither cross-conne		
	Violation	n Description				e permitted. Specifically, a plu		
		•				ple service connections locate		
				the	e city limits was	not provided.		
			<u> </u>			_		+5.000
						Base	e Penalty	\$5,000
>> En	vironme	ntal, Prope	rty and Human		Matrix			
		Release		<b>Harm</b> oderate	Minor			
OR		Actual			MINO			
		Potential				Percent 0.0%		
_								
>>Pro	ogramma	tic Matrix Falsification	Major Mo	oderate	Minor			
		Taisincation		Juerate	X	Percent 1.0%		
	L		II					
	Matrix							
	Notes		At least 7	'0% of the	e rule requireme	nts were met.		
						Adjustment	\$4,950	
							-	\$50
							L	\$30
Violati	ion Event	s						
		Number of V	/iolation Events	1		742 Number of violation	davs	
				-			uuyo	
			daily					
			weekly					
			monthly quarterly			Violation Base	Penalty	\$50
			semiannual			Field for Bus		<del>,</del> ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
			annual					
			single event	х				
	[							
			Or	ne single e	event is recomm	ended.		
Good F	Faith Effo	orts to Com	ply	0.0%			Reduction	\$0
			Before		NOE/NOV to EDPRE			<del>_</del>
			Extraordinary					
			Ordinary					
			N/A	x				
			Notes The	Respond		et the good faith criteria for		
					this vio	lation.		
						Violation	Subtotal	\$50
								\$JU
Econor	mic Bene	efit (EB) for	this violation			Statutory Limit	Test	
		Estimate	ed EB Amount		\$28	Violation Final Pena	alty Total	\$67
					ation Final Acc	sessed Penalty (adjusted f	or limite)	\$67
				1115 110		cessed renaity (aujusted fo	si innts)	<del>۵</del> 07

	E	conomic	Benefit	Woi	rksheet		
Respondent	City of Post (P	CW No. 2)					
Case ID No.	56405						
Reg. Ent. Reference No.	RN101421519	1					
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	11					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$180	16 1.4 2010	1. Cam 2022	0.00	\$0	n/a	\$0 #28
Other (as needed)	\$180	16-Jul-2019	1-Sep-2022	3.13	\$28	n/a	\$28
Notes for DELAYED costs	include the s	service connection Agreed Order Dock	s located outside et No. 2018-09	e the ci 72-PWS	ty limits, calculated G-E to the estimate	rdinance or service I from the effective d date of complianc	date of TCEQ e.
Avoided Costs	ANNU	ALIZE avoided c	osts before en		<u> </u>	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
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$180			TOTAL		\$28



	E	conomic	Benefit	Wo	r <b>ksheet</b>		
Respondent							
Case ID No.		,					
Reg. Ent. Reference No.							
	Public Water S						Years of
		արիւչ				<b>Percent Interest</b>	Depreciation
Violation No.	12						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	r			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
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	and to cond including but	uct CSI at location not limited to the	new high school	connect ol, elem	ions or potential co entary school, Jacl	connections are pro ontamination hazard k & Jill Donuts, EMS or Violation No. 3 of	ls may exist, Building, field
Avoided Costs	ANNU	ALIZE avoided co	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$0			TOTAL		\$0

	Screening Date		Docket No. 2021-0978-PWS-E	PCW
	-	City of Post (PCW No. 2)		Policy Revision 5 (January 28, 2021)
Rea	Case ID No. Ent. Reference No.			PCW Revision February 11, 2021
Reg.		Public Water Supply		
	Enf. Coordinator			
	Violation Number			
	Rule Cite(s)		0.46(z) and TCEQ Agreed Order Docket No. 2018 5-E, Ordering Provision No. 2.c.iii	3-0972-
		P VV3		
	Violation Description	Failed to develop a nitri	fication action plan ("NAP") for a system distribu chloraminated water.	iting
			Base	Penalty \$5,000
				\$5,000
>> Env	vironmental, Prope	rty and Human Health	n Matrix	
	Release	Harm Major Moderate	Minor	
OR	Actua			
	Potentia		<b>Percent</b> 0.0%	
>> Bro	grammatic Matrix			
FIU	Falsification	Major Moderate	Minor	
		x	Percent 20.0%	
	Matrix	100% of the rul	e requirements were not met.	
	Notes	100% of the ful	e requirements were not met.	
			Adjustment	\$4,000
				\$1,000
	<u> </u>			
Violatio	on Events			
	Number of	Violation Events 1	742 Number of violation da	ays
			- <u> </u>	
		daily weekly	-	
		monthly	1	
		quarterly	Violation Base	Penalty \$1,000
		semiannual		
		annual	4	
		single event x	4	
		One single	event is recommended.	
Good F	aith Efforts to Com	nply 0.0%	R	eduction \$0
		Before NOE/NOV		
		Extraordinary		
		Ordinary N/A x		
			. <u></u>	
		Notes The Respon	dent does not meet the good faith criteria for this violation.	
			Violation S	Subtotal \$1,000
Ferrer		this violeties		·
Econor	nic Benefit (EB) fo	this violation	Statutory Limit	lest
	Estimat	ed EB Amount	\$24 Violation Final Penal	ty Total \$1,340
		This vio	plation Final Assessed Penalty (adjusted for	r limits) \$1,340
			· · · · · · · · · · · · · · · · · · ·	

	E	conomic	Benefit	IOW	'ksheet		
Respondent	City of Post (P	CW No. 2)					
Case ID No.		,					
eg. Ent. Reference No.							
							Verseef
	Public Water S	supply				<b>Percent Interest</b>	Years of
Violation No.	13						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Item Description							
Delayed Casta							
Delayed Costs	Ir	11 11	1		+0	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Engineering/Construction Land				0.00	\$0 \$0	<u>۵</u>	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling		1		0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$180	16-Jul-2019	21-Mar-2022	0.00 2.68	\$0 \$24	n/a n/a	\$0 \$24
Permit Costs		ost includes the e	stimated amoun	0.00 2.68	\$0 \$24	n/a n/a ed from the effectiv	\$0 \$24
Permit Costs Other (as needed)	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	0.00 2.68 t to crea 18-0972	\$0 \$24 ate a NAP, calculat -PWS-E to the dat	n/a n/a ed from the effectiv	\$0 \$24 re date of TCEC
Permit Costs Other (as needed) Notes for DELAYED costs	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	0.00 2.68 t to crea 18-0972	\$0 \$24 ate a NAP, calculat -PWS-E to the dat item (except for \$0	n/a n/a ed from the effectiv e of compliance. one-time avoided \$0	\$0 \$24 re date of TCEC d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	t to creater t to creater tering 0.00	\$0 \$24 ate a NAP, calculat -PWS-E to the dat item (except for \$0 \$0	n/a n/a ed from the effective e of compliance. one-time avoided \$0 \$0	\$0 \$24 re date of TCEQ <b>1 costs)</b> \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	t to creater to create	\$0 \$24 ate a NAP, calculat -PWS-E to the dat item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a ed from the effective e of compliance. one-time avoided \$0 \$0 \$0	\$0 \$24 re date of TCEQ i costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	t to creater to create	\$0 \$24 ate a NAP, calculat -PWS-E to the dat item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ed from the effective e of compliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$24 re date of TCEC 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	t to creater t to creater t to creater tering 0.00 0.00 0.00 0.00	\$0 \$24 ate a NAP, calculat -PWS-E to the dat item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ed from the effective e of compliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$24 re date of TCEQ 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	0.00           2.68           t to created to create the created to created to create the created to created to created to	\$0 \$24 ate a NAP, calculat -PWS-E to the dat item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ed from the effective e of compliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$24 re date of TCEQ 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	t to creater t to creater t to creater tering 0.00 0.00 0.00 0.00	\$0 \$24 ate a NAP, calculat -PWS-E to the dat item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ed from the effective e of compliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$24 re date of TCEC 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed c	ost includes the e Agreed Order	stimated amoun r Docket No. 201	0.00           2.68           t to created to create the created to created to create the created to created to created to	\$0 \$24 ate a NAP, calculat -PWS-E to the dat <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ed from the effective e of compliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$24 re date of TCE( 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Dat		<b>Docket No.</b> 2021-0978-PWS		PCW
Responder Case ID N	t City of Post (PCW No. 2)			n 5 (January 28, 2021)
Reg. Ent. Reference N			PCW Revis	ion February 11, 2021
-	a Public Water Supply			
Enf. Coordinate	Epifanio Villarreal			
Violation Numb				
Rule Cite(		290.121(a) and (b) and TCEQ Agreed Order 72-PWS-E, Ordering Provision No. 2.c.iv	Docket No.	
	2010-09			
Violation Description	monitoring plan that id frequency, and specifies th	maintain an up-to-date chemical and micro entifies all sampling locations, describes the ne analytical procedures and laboratories th comply with the monitoring requirements.	e sampling	
			Base Penalty	\$5,000
>> Environmental, Prop	erty and Human Healt	h Matrix		
	Harm			
OR Actu		Minor		
Potent		Percent 0.	0%	
l otene			0,0	
>>Programmatic Matrix				
Falsificatio			201	
	X	Percent 20.	0%	
Matrix Notes	100% of the ru	le requirements were not met.		
		Adjustment	\$4,000	
		Aujustment	\$4,000	
				\$1,000
Violation Events				
Number o	f Violation Events 1	742 Number of viola	tion days	
	dailyweeklymonthlyquarterlysemiannualannualsingle eventx	Violation	Base Penalty	\$1,000
	One singl	e event is recommended.		
Good Faith Efforts to Co	mply 0.0%	6	Reduction	\$0
	Before NOE/NO			
	Extraordinary			
	Ordinary			
	N/A <mark></mark>			
	Notes The Response	ndent does not meet the good faith criteria this violation.	for	
		Viola	tion Subtotal	\$1,000
Economic Benefit (EB) f	or this violation	Statutory Li	mit Test	
Ectim	ated EB Amount	\$28 Violation Final	Penalty Total	\$1,340
LSUIII	<u> </u>			
	This vi	iolation Final Assessed Penalty (adjust	ed for limits)	\$1,340

	E	conomic	Benefit	Woi	rksheet		
Respondent		CW No. 2)					
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S	Supply				Percent Interest	Years of
Violation No.	14						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	[ <u></u>	1		7	1		
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Training/Sampling				0.00	\$0	n/a	\$0 \$0
Remediation/Disposal Permit Costs				0.00	\$0	n/a n/a	\$0 \$0
Other (as needed)	\$180	16-Jul-2019	1-Sep-2022	3.13	\$28	n/a	\$28
Notes for DELAYED costs		ological monitoring	g plan, calculated	d from t		aintaining an up-to- of TCEQ Agreed Ord mpliance.	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$180			TOTAL		\$28

	Screen	ing Date	27-Jul-2021		D	ocket No.	2021-0978-PWS-E			PCW
		-	City of Post (PC	CW No. 2)				Policy R	evision 5 (Jai	nuary 28, 2021)
Beg		e ID No.						PCW	Revision Fel	bruary 11, 2021
Reg.	Ent. Refer		Public Water St	innly						
	Enf. Coo		Epifanio Villarre							
	Violatio	n Number	15							
	Ru	ule Cite(s)	30 Tex. Admin.				Agreed Order Dock	et No. 2018-		
				0972-P	WS-E, Order	ing Provision	1 NO. 2.0.1			
	Violation D	escription	tanks. Spec	ifically, the LA	S storage co pooster statio	ontainers at t	or all liquid chemical the Slaton tank, Wh tank did not have a	ite River		
							Ва	se Penalty		\$5,000
>> En	vironmenta	al, Prope	ty and Hum	an Health	Matrix					
		Release		<b>Harm</b> Moderate						
OR		Actual	Major	Moderale	Minor	1				
		Potential		x		j	Percent 15.0%	5		
						-				
>>Pro	ogrammatic	alsification	Major	Moderate	Minor					
		aloineación				]	Percent 0.0%	D		
	Matrix Notes			contaminants		not exceed	employees or the er levels that are prote			
						Ad	justment	\$4,250		
							<b>,</b>			\$750
								1		\$730
Violati	ion Events									
	1	Number of \	iolation Events	8		695	Number of violation	n days		
					I T		2			
			daily							
			weekly monthly							
			quarterly	х			Violation Ba	se Penalty		\$6,000
			semiannual							
			annual single event							
			<u>-</u>							
		Eight quart	erly events are		d, calculated ing, July 27,		mber 1, 2019, to the	e date of		
Good	Faith Effort	s to Com	nlv	0.0%				Reduction		\$0
2004			В	efore NOE/NOV	NOE/NOV to E	DPRP/Settleme	ent Offer	Reduction		
			Extraordinary				4			
			Ordinary		)	<				
			N/A					1		
			Notes	The Respon	dent achieve	ed complianc 2021.	e on September 2,			
							Violatio	n Subtotal		\$6,000
Econo	mic Benefit	: (EB) for	this violation	on			Statutory Lim	it Test		
		Estimate	ed EB Amount		\$0	]	Violation Final Pe	nalty Total		\$8,040
				This vio	lation Final	Accessed 1	Penalty (adjusted	for limite)		\$8,040
				1115 110		733533EU	charry (aujusted	.or mitts)		φ <b>0,0</b> 40

		conomic	Benefit	Wor	<b>ksheet</b>		
Respondent	City of Post (P	CW No. 2)					
Case ID No.		,					
Reg. Ent. Reference No.							
							Veene of
	Public Water S	ырру				<b>Percent Interest</b>	Years of
Violation No.	15						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rem bescription							
Delayed Casta							
Delayed Costs	Ir				+ 2	+0	+ 2
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/Construction				0.00	\$0 \$0		\$0 \$0
Land				0.00	\$0	n/a n/a	\$0
Record Keeping System Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
						n/a	<b>4</b> 0
Other (as needed)		<u>                                      </u>		0.00	\$0	n/a	\$0
Other (as needed) Notes for DELAYED costs	The delayed			ment fa		storage containers	
		the Econor	nic Benefit Wor	ment fa ksheet f	cilities for the LAS or Violation No. 4	storage containers	is captured in
Notes for DELAYED costs		the Econor	nic Benefit Wor	ment fa ksheet f <b>itering</b>	cilities for the LAS or Violation No. 4 item (except for \$0	storage containers of PCW No. 1. one-time avoided \$0	is captured in I costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel		the Econor	nic Benefit Wor	ment fa ksheet f tering 0.00	cilities for the LAS or Violation No. 4 item (except for \$0 \$0	storage containers of PCW No. 1. one-time avoider \$0 \$0	is captured in I costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling		the Econor	nic Benefit Wor	ment fa ksheet f 1 0.00 1 0.00 1 0.00	cilities for the LAS or Violation No. 4 item (except for \$0 \$0 \$0	storage containers of PCW No. 1. one-time avoided \$0 \$0 \$0	is captured in <b>1 costs)</b> \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment		the Econor	nic Benefit Wor	ment fa ksheet f 0.00 0.00 0.00 0.00 0.00	cilities for the LAS or Violation No. 4 of item (except for \$0 \$0 \$0 \$0	storage containers of PCW No. 1. one-time avoided \$0 \$0 \$0 \$0	is captured in 1 costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance		the Econor	nic Benefit Wor	ment fa ksheet f 0.00 0.00 0.00 0.00 0.00 0.00	cilities for the LAS or Violation No. 4 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	storage containers of PCW No. 1. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	is captured in 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		the Econor	nic Benefit Wor	ment fa ksheet f 0.00 0.00 0.00 0.00 0.00 0.00 0.00	cilities for the LAS or Violation No. 4 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	storage containers of PCW No. 1. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	is captured in (i costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance		the Econor	nic Benefit Wor	ment fa ksheet f 0.00 0.00 0.00 0.00 0.00 0.00	cilities for the LAS or Violation No. 4 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	storage containers of PCW No. 1. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	is captured in f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		the Econor	nic Benefit Wor	ment fa ksheet f 0.00 0.00 0.00 0.00 0.00 0.00 0.00	cilities for the LAS or Violation No. 4 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	storage containers of PCW No. 1. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	is captured in \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Screening Dat	<b>2</b> 7-Jul-2021	Docket No. 2021	-0978-PWS-E	PCW
	-	t City of Post (PCW No. 2)		Policy Re	vision 5 (January 28, 2021)
Dee	Case ID No			PCW	Revision February 11, 2021
keg.	Ent. Reference No Medi	RN101421519     Public Water Supply			
	Enf. Coordinato				
	Violation Numbe	r <u>16</u>			
	Rule Cite(s		42(e)(7)(C) and TCEQ Agreed		
	Violation Descriptio	Failed to provide a sampling to be added to the wate	WS-E, Ordering Provision No. 3 tap at locations that allow for t er to form monochloramine as ras installed ahead of injection	the chlorine and ammonia the primary species.	
				Base Penalty	\$5,000
>> Env	vironmental, Prop	erty and Human Health	Matrix		
		Harm			
OR	Releas Actua		Minor		
OR	Potenti		Perc	ent 15.0%	
		<u></u>		·	
>>Pro	grammatic Matrix Falsificatior	Major Moderato	Minor		
	Faisincation	Major Moderate	Minor Perc	cent 0.0%	
		provide a sampling tap hinders se customers to a significant a protecti			
			Adjustn	nent \$4,250	
					\$750
				L	φ <b>γ</b> 50
Violati	on Events				
	Number of	Violation Events 8	695 Num	ber of violation days	
		daily weekly monthly		-	
		quarterly     x       semiannual		Violation Base Penalty	\$6,000
	Eight quarte	rly monthly events are recommon of scree	nended, calculated from Septer ening, July 27, 2021.	nber 1, 2019, to the date	
Good F	aith Efforts to Co			Reduction	\$600
		Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offe	3r	
		Ordinary	X		
		N/A			
		Notes The Respon	dent achieved compliance on S 2021.	September 2,	
				Violation Subtotal	\$5,400
Econor	mic Benefit (EB) fo	or this violation	Sta	tutory Limit Test	
	Estima	ted EB Amount	\$0 Viola	tion Final Penalty Total	\$7,440
			lation Final Assessed Penal		\$7,440
			A CONTRACTOR AND A CONTRACTOR ANTE ANTE		φ,,τ <del>τ</del> Ο

	E	conomic	Benefit	Woi	rksheet		
Respondent	t City of Post (P	CW No. 2)					
Case ID No		,					
leg. Ent. Reference No							
<b>U</b>	Public Water S						Years of
		ырріу				<b>Percent Interest</b>	Depreciation
Violation No	. 16						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Item Description	•						
Delawed Center	_						
Delayed Costs	۰ 				+0	+0	*0
Equipment				0.00	\$0	\$0	\$0
Buildings		<u> </u>		0.00	\$0 ¢0	\$0 ¢0	<u>\$0</u>
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0
Engineering/Construction				0.00	\$0 \$0		\$0 \$0
Land				0.00		n/a n/a	<u>\$0</u> \$0
Record Keeping System Training/Sampling				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Remediation/Disposal				0.00	\$0	n/a	<u>\$0</u> \$0
Permit Costs				0.00	\$0	n/a	<u>\$0</u> \$0
Other (as needed)							
other (us needed)	The delayed o	osts to install one	adequate same	0.00	\$0	n/a	\$0 and ammonia
Notes for DELAYED costs			form monochlor	ling tap amine i	at locations that a	l n/a allow for the chloring Economic Benefit Wo	e and ammonia
	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i n No. 5	at locations that a scaptured in the E of PCW No. 1.	allow for the chlorine	e and ammonia orksheet for
Notes for DELAYED costs	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i n No. 5	at locations that a scaptured in the E of PCW No. 1.	allow for the chloring conomic Benefit Wo one-time avoideo \$0	e and ammonia orksheet for
Notes for DELAYED costs	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 <b>tering</b> 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0	allow for the chloring conomic Benefit Wo one-time avoideo \$0 \$0	e and ammonia prksheet for I costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 tering 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0	allow for the chloring conomic Benefit Wo one-time avoided \$0 \$0 \$0	and ammonia prksheet for <b>I costs)</b> \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 tering 0.00 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0	allow for the chlorine conomic Benefit Wo one-time avoided \$0 \$0 \$0 \$0	e and ammonia prksheet for I costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 <b>tering</b> 0.00 0.00 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	allow for the chloring conomic Benefit Wo one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e and ammonia prksheet for I costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 tering 0.00 0.00 0.00 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	allow for the chlorine conomic Benefit Wo so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e and ammonia orksheet for 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 <b>tering</b> 0.00 0.00 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	allow for the chloring conomic Benefit Wo one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e and ammonia prksheet for i costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 tering 0.00 0.00 0.00 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	allow for the chlorine conomic Benefit Wo so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e and ammonia prksheet for 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 tering 0.00 0.00 0.00 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	allow for the chlorine conomic Benefit Wo so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e and ammonia prksheet for 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	to be adde	ed to the water to	form monochlor Violatior	ling tap amine i No. 5 tering 0.00 0.00 0.00 0.00 0.00 0.00	at locations that a s captured in the E of PCW No. 1. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	allow for the chlorine conomic Benefit Wo so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e and ammonia prksheet for 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Do	ocket No. 2021-0978-PWS-E			PCW
		espondent ase ID No.	City of Post (PCW	/ No. 2)					anuary 28, 2021)
Reg.			RN101421519				РСИ	Revision Fe	ebruary 11, 2021
			Public Water Sup	ply					
			Epifanio Villarrea	I					
	Viola	tion Number Rule Cite(s)						1	
		Rule Cite(s)		30 T	ex. Admin. C	ode § 290.43(d)(3)			
	Violatio	n Description				letermine the air-water-volume for lass for the pressure tank was br			
						Baa	Donality		¢E 000
						Base	e Penalty		\$5,000
>> Env	vironme	ntal, Prope	rty and Huma	n Health <sub>Harm</sub>	Matrix				
		Release	Major	Moderate	Minor				
OR		Actual							
		Potential		Х		<b>Percent</b> 15.0%			
>>Pro	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor	<b>P</b>			
						Percent 0.0%			
		Failure to p	rovide the pressu	re tank with	a device to d	determine the air-water-volume r	nay not		
	Matrix	allow the ope	rator to make neo	cessary pres	sure adjustm	ents which could expose custom	ers of the		
	Notes	Facility to a si	gnificant amount o	of contamin	ants which w health.	ould not exceed levels protective	of human		
					nealth				
						Adjustment	\$4,250		
							1		\$750
	_								
violatio	on Event	[S							
		Number of V	/iolation Events	1		76 Number of violation	days		
			daily		ส				
			weekly						
			monthly						
			quarterly semiannual	Х		Violation Base	e Penalty		\$750
			annual						
			single event						
								1	
		One quarterly				he date of the investigation, May July 8, 2021	12, 2021,		
					r compliance,	5419 0, 2021			
Good F	aith Effo	orts to Com	ply	25.0%			Reduction		\$187
			Bef	ore NOE/NOV		DPRP/Settlement Offer			
			Extraordinary						
			Ordinary N/A	Х					
					n				
			Notes	The Respor	ndent achieve	ed compliance on July 8, 2021.			
						Violation	Subtotal		\$563
Econor	nic Bene	efit (EB) for	this violation	n		Statutory Limit	Test		
		Estimate	ed EB Amount		\$5	Violation Final Pena	alty Total		\$818
				This vio	lation Final	Assessed Penalty (adjusted f	or limits)		\$818
						, (,			++==0

	E	conomic	Benefit	юW	<b>ksheet</b>		
Respondent	City of Post (P	CW No. 2)					
Case ID No.		/					
leg. Ent. Reference No.							
<b>U</b>							N
	Public Water S	ырріу				<b>Percent Interest</b>	Years of
Violation No.	17						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs	1500						
Equipment	\$500	12-May-2021	8-Jul-2021	0.16	\$0	\$5	\$5
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	<u>\$0</u> \$0
	The delayed	aa ah in alu daa hha					
Notes for DELAYED costs	The delayed				epair the site glass on to the date of c	on the pressure tak compliance.	nk, calculated
Notes for DELAYED costs		from the	e date of the inv	estigati	on to the date of c	ompliance.	
		from the	e date of the inv	estigati	item (except for \$0	ompliance. one-time avoided \$0	<b>i costs)</b> \$0
Avoided Costs		from the	e date of the inv	tering 0.00 0.00	item (except for \$0 \$0	ompliance. one-time avoided \$0 \$0	<b>1 costs)</b> \$0 \$0
Avoided Costs Disposal Personnel		from the	e date of the inv	tering 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0	ompliance. one-time avoided \$0 \$0 \$0 \$0	1 costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel		from the	e date of the inv	tering 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	ompliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	1 costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling		from the	e date of the inv	estigati 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	<b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment		from the	e date of the inv	tering 0.00 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	ompliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	i costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance		from the	e date of the inv	estigati 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	<b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	1 costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs		from the	e date of the inv	tering 0.00 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	ompliance. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	i costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Screening Date		<b>Docket No.</b> 2021-0978-PWS-E	PCW
	Case ID No.	City of Post (PCW No. 2) 56405		Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021
Reg. Ent	. Reference No.	RN101421519		
-	Media Inf. Coordinator	Public Water Supply		
<b>-</b>	Violation Number			
	Rule Cite(s)	30 Tex	Admin. Code § 290.46(m)(1)(B)	
Vid	olation Description	Failed to inspect t	the Facility's 0.01 MG pressure tank annually.	
			Base	Penalty \$5,000
>> Enviro	onmental, Prope	rty and Human Health	Matrix	
	Release	<b>Harm</b> Major Moderate	Minor	
OR	Actual			
	Potential	X	<b>Percent</b> 30.0%	
>>Progra	mmatic Matrix			
	Falsification	Major Moderate	Minor Percent 0.0%	
		loss of tank integrity and coul	's pressure tank could result in non-detection or d expose persons served by the Facility to conta levels protective of human health.	
			Adjustment	\$3,500
				\$1,500
				+-/
Violation I	Events			
	Number of V	Violation Events 1	76 Number of violation da	ays
		daily	1	
		weekly		
		monthly quarterly	Violation Base	Penalty \$1,500
		semiannual	Violation base	Fenalty \$1,500
		annual		
		single event <u>x</u>	<u>u</u>	
		One single	event is recommended.	
Good Fait	h Efforts to Com	10.0%		eduction \$150
Jood Full		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
		Extraordinary		
		Ordinary N/A	X	
			ondent achieved compliance on August 26,	
		Notes	2021.	
		<u>L</u>	Violation S	Subtotal \$1,350
Economic	Benefit (EB) for	r this violation	Statutory Limit	
		ed EB Amount	\$42 Violation Final Penal	
	estimat			
		This vio	lation Final Assessed Penalty (adjusted for	r limits) \$1,860

	E	conomic	Benefit	Woi	<b>ksheet</b>		
Respondent Case ID No. Reg. Ent. Reference No.	56405						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				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)	\$41	12-May-2021	26-Aug-2021	0.29	\$1	n/a	\$1
Notes for DELAYED costs	tank (\$41 p	er tank x one tanl	<), calculated fr	om the	date of the investi	surface of the 0.01 gation to the date of	of compliance.
Avoided Costs	ANNU	ALIZE avoided o	costs before en		<u> </u>	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	÷41	12 May 2021	27 1.1 2021	0.00	\$0	\$0	\$0
ONE-TIME avoided costs	\$41	12-May-2021	27-Jul-2021	0.21	\$0	\$41	\$41
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs						surface of the 0.01 igation to the date	
Approx. Cost of Compliance		\$82			TOTAL		\$42



# Compliance History Report

Compliance History Report for CN600248876, RN101421519, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent,	CN600248876, City of Post	Classification: SATISFACTORY	Rating: 39.09						
or Owner/Operator:			-						
Regulated Entity:	RN101421519, CITY OF POST PUBLIC WATER SUPPLY	<b>Classification:</b> NOT APPLICABLE	Rating: N/A						
<b>Complexity Points:</b>	N/A	Repeat Violator: N/A							
CH Group:	14 - Other								
Location:	Location: 105 EAST MAIN STREET IN POST, GARZA COUNTY, TEXAS								
TCEQ Region:	REGION 02 - LUBBOCK								
ID Number(s): PUBLIC WATER SYSTEM/SUPPLY REGISTRATION WATER LICENSING LICENSE 0850001 0850001									
Compliance History Per	iod: September 01, 2016 to August 31, 2	021 Rating Year: 2021 Rati	ng Date: 09/01/2021						
Date Compliance Histor	y Report Prepared: October 22, 202	1							
Agency Decision Requir	ing Compliance History: Enforceme	ent							
Component Period Sele	cted: October 22, 2016 to October 22, 2	2021							
TCEQ Staff Member to C	Contact for Additional Information	Regarding This Compliance Histo	ry.						
Name: EPI VILLARREA	AL	<b>Phone:</b> (361) 881-6991							
Site and Owner/Oper	<u>ator History:</u>								
	nce and/or operation for the full five year c change in ownership/operator of the site d								
	change in ownership, operator of the site of								
<u>Components (Multime</u>	edia) for the Site Are Listed in S	<u>Sections A - J</u>							
A. Final Orders, court j	udgments, and consent decrees:								
1 Effective Date: 0		8-0972-PWS-E (1660 Order-Agreed Ord	der With Denial)						
Classification: Citation: 30 T	Moderate AC Chapter 290, SubChapter D 290.42(e)(	7)(C)							
	iled to provide sampling taps at locations t		b be added to the water						
to form monoch Classification:	loramine as the primary species Moderate								
	AC Chapter 290, SubChapter D 290.42(f)(	1)(E)(ii)							
•	iled to provide adequate containment facili	ties for all liquid chemical storage tanks							
Classification:	Moderate AC Chapter 290, SubChapter D 290.44(h)(	3)							
	iled to provide an air gap between the fillin		he overhead bulk water						
dispensing stati Classification:	on								
	AC Chapter 290, SubChapter D 290.44(h)(	4)							
•	iled to have all backflow prevention assemi flow assembly tester and certified that the Moderate	•	nnual basis by a						
	AC Chapter 290, SubChapter D 290.46(e)(								
Class "C" or hig		supervision of at least two water works	operators who hold a						
Classification:	Minor 1								

Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(II)

Description: Failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation

Classification: Moderate

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

Description: 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 Classification: Moderate

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

Description: Failed to complete a customer service inspection ("CSI") certificate prior to providing continuous service to new construction or any existing service when the water purveyor has reason to believe that a cross-connection or other potential contamination hazard exist

Classification: Moderate

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

Description: Failed to flush all dead-end mains at monthly intervals

Classification: Minor

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

Description: Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(A)

Description: Failed to conduct an annual inspection of the Facility's 1.0 MG ground storage tank

Classification: Moderate

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

Description: Failed to verify the accuracy of the manual disinfectant residual analyzer at least once every 90 days using chlorine solutions of known concentrations

Classification: Minor

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

Description: Failed to post a legible sign at the Facility's production, treatment, and storage facilities that contains the name of the Facility and an emergency telephone number where a responsible official can be contacted Classification: Moderate

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

Description: Failed to develop a nitrification action plan ("NAP") for a system distributing chloraminated water

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(c)(5)

Description: Failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.121(a)

30 TAC Chapter 290, SubChapter F 290.121(b)

Description: Failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements Classification: Moderate

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(B)

Description: Failed to conduct an annual inspection of the Facility's 0.01 MG pressure tank in 2017

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(B)

Description: Failed to conduct an inspection of the interior of the Faciliy's 0.01 MG pressure tank with an inspection port at least once every five years

#### **B.** Criminal convictions:

N/A

#### C. Chronic excessive emissions events:

N/A

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

Item 1	August 21, 2019	(1590900)
Item 2	September 16, 2021	(1762059)

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

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

1	Date: 12/2	21/2020 (1744940)
1		NO Classification: Moderate
	Citation:	30 TAC Chapter 290, SubChapter F 290.117(c)(2)(C)
		30 TAC Chapter 290, SubChapter F 290.117(h)
	Description:	30 TAC Chapter 290, SubChapter F 290.117(i)(1) LCR RD MR 3Y2020 - The system failed to monitor and/or report distribution lead
	Description	and copper levels to the TCEQ for the triennial reduced monitoring period from
		01/01/2018 to 12/31/2020 within the required timeline.
2	Date: 03/1	17/2021 (1744940)
	Self Report?	NO Classification: Moderate
	Citation:	30 TAC Chapter 290, SubChapter F 290.109(d)
		30 TAC Chapter 290, SubChapter F 290.109(d)(2)(F) 30 TAC Chapter 290, SubChapter F 290.109(g)(4)
		30 TAC Chapter 290, SubChapter F 290.109(g)(5)
		40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(a)(1) 40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(c)
		40 CFR Chapter 141, SubChapter D, PT 141, SubFT 141.855(C) 40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.860(c)
	Description:	RTCR Routine MR Violation 01/2021 - Failure to collect and/or submit all routine
		monitoring sample(s) within the required timeline.
3	Date: 04/2	21/2021 (1744940)
	Self Report?	NO Classification: Moderate
	Citation:	30 TAC Chapter 290, SubChapter F 290.109(d) 30 TAC Chapter 290, SubChapter F 290.109(d)(2)(F)
		30 TAC Chapter 290, SubChapter F 290.109(g)(4)
		30 TAC Chapter 290, SubChapter F 290.109(g)(5) 40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(a)(1)
		40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(c)
		40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.860(c)
	Description:	RTCR Routine MR Violation 02/2021 - Failure to collect and/or submit all routine monitoring sample(s) within the required timeline.
4		29/2021 (1744940) NO Classification: Moderate
	Citation:	30 TAC Chapter 290, SubChapter F 290.109(d)
		30 TAC Chapter 290, SubChapter F 290.109(d)(2)(F)
		30 TAC Chapter 290, SubChapter F 290.109(g)(4) 30 TAC Chapter 290, SubChapter F 290.109(g)(5)
		40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(a)(1)
		40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(c)
	Description:	40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.860(c) RTCR Routine MR Violation 03/2021 - Failure to collect and/or submit all routine
	Description	monitoring sample(s) within the required timeline.
5	Date: 05/2	24/2021 (1744940)
		NO Classification: Moderate
	Citation:	30 TAC Chapter 290, SubChapter F 290.109(d)
		30 TAC Chapter 290, SubChapter F 290.109(d)(2)(F) 30 TAC Chapter 290, SubChapter F 290.109(g)(4)
		30 TAC Chapter 290, SubChapter F 290.109(g)(5)
		40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(a)(1)
		40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(c) 40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.860(c)
	Description:	RTCR Routine MR Violation 04/2021 - Failure to collect and/or submit all routine
		monitoring sample(s) within the required timeline.
6	Date: 06/2	23/2021 (1744940)
	Self Report?	NO Classification: Moderate
	Citation:	30 TAC Chapter 290, SubChapter F 290.110(e)(4)(A) 30 TAC Chapter 290, SubChapter F 290.110(f)(2)
		30 TAC Chapter 290, Subchapter F 290.110(1)(2) 30 TAC Chapter 290, SubChapter F 290.110(f)(3)
	Description:	DLQOR MR 1Q2021 - The system failed to monitor and/or report distribution
		disinfectant residuals to the TCEQ for the 1st quarter of 2021 within the required

timeline.

Date:	06/2	28/2021	(1744940)					
Self Repo	rt?	NO				Classification	: M	oderate
Citation:		30 TAC	Chapter 290	), SubChapter F	290.109	(d)		
		30 TAC	Chapter 290	), SubChapter F	290.109	(d)(2)(F)		
		30 TAC 40 CFR 40 CFR	Chapter 290 Chapter 141 Chapter 141	), SubChapter F ), SubChapter F L, SubChapter D L, SubChapter D L, SubChapter D	290.109 , PT 141, , PT 141,	(g)(5) SubPT Y 141 SubPT Y 141	853(c	)
Descriptio	on:			iolation 05/2021 s) within the rec			d/or sı	ubmit all routine

#### F. Environmental audits:

N/A

7

- G. Type of environmental management systems (EMSs):  $_{\mbox{N/A}}$
- H. Voluntary on-site compliance assessment dates: \$N/A\$
- I. Participation in a voluntary pollution reduction program: \$N/A\$
- J. Early compliance: N/A

#### Sites Outside of Texas:

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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#### IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING CITY OF POST RN101421519

BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

### AGREED ORDER DOCKET NO. 2021-0978-PWS-E

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

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

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

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

# I. FINDINGS OF FACT

- 1. The Respondent owns and operates a public water supply located at 105 East Main Street in Post, Garza County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 1,752 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(71).
- 2. During an investigation conducted on May 12, 2021 through May 26, 2021, an investigator documented that:
  - a. There was buildup of liquid ammonium sulfate ("LAS") on the LAS injection pump at the White River injection site and the building surrounding the LAS at the White River injection site was rusting along the bottom;
  - b. The fan for the chlorinator room at the White River injection site was inoperable;
  - c. The Respondent did not inspect the Facility's one million-gallon ("MG") ground storage tank ("GST") annually;

- d. The Respondent did not maintain a thorough and up-to-date plant operations manual for operator review and reference;
- e. The Respondent did not monitor the disinfectant residual at representative locations in the distribution system at least once per day;
- f. The Facility used two operators with a Class "D" license;
- g. Records for the amount of each chemical used each day, the date, location, and nature of water quality, pressure, or outage complaints received by the system and the results of any subsequent complaint investigation records, and dates the dead-end mains were flushed were not maintained on-site for review;
- h. The Respondent did not conduct an inspection of the interior of the Facility's 0.01 MG pressure tank at least once every five years;
- i. Backflow prevention assembly tests conducted for the Garza County Clinic, Hudman Funeral Home, and Giles Dalby Correctional Facility were incorrectly tested while backflow prevention assembly tests for the Stripes, Allsups, McDonald's, and Holly's Drive-In were not provided;
- j. The Respondent did not conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled;
- k. A plumbing ordinance or service agreement for the multiple service connections located outside the city limits was not provided;
- l. CSIs had not been performed at the new high school, elementary school, Jack & Jill Donuts, Emergency Medical Service ("EMS") Building, field house, and car wash;
- m. The Respondent did not develop a nitrification action plan ("NAP") for a system distributing chloraminated water;
- n. The Respondent did not develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements;
- o. The LAS storage containers at the Slaton tank, White River Municipal Water District booster station, and Post tank did not have adequate containment;
- p. Only one tap was installed ahead of injection at the tank battery site;
- q. The site glass for the pressure tank was broken; and

- r. The Respondent did not inspect the Facility's 0.01 MG pressure tank annually.
- 3. The Executive Director recognizes that the Respondent implemented the following corrective measure as the Facility:
  - a. By inspecting the 1 MG GST by June 9, 2021;
  - b. By providing records of dead-end main flushing and provided a complaint log by July 8, 2021;
  - c. By repairing the site glass on the pressure tank by July 8, 2021;
  - d. By cleaning up the buildup of LAS on the LAS injection pump at the White River injection site by August 2, 2021;
  - e. By maintaining an up-to-date and thorough plant operations manual for operator review and reference by August 19, 2021;
  - f. By conducting the interior inspection for the Facility's 0.01 MG pressure tank by August 26, 2021;
  - g. By conducting an inspection of the Facility's 0.01 MG pressure tank by August 26, 2021;
  - h. By providing adequate containment facilities for the LAS storage containers at the Slaton tank, White River Municipal Water District booster station, and Post tank by September 2, 2021;
  - i. By installing adequate sampling taps at locations that allow for the chlorine and ammonia to be added to the water to form monochloramine as the primary species by September 2, 2021;
  - j. By replacing the building where the rust was encountered on the building surrounding the LAS at the White River injection site by September 2, 2021;
  - k. By providing records for the amount of each chemical used each day by January 27, 2022;
  - l. By submitting copies of backflow prevention assembly tests for McDonalds and Holly's Drive-In by February 9, 2022;
  - m. By submitting photos demonstrating that the fan in the chlorinator room at the White River injection site was replaced by February 15, 2022; and
  - n. By submitting a NAP by March 21, 2022.

#### **II. CONCLUSIONS OF LAW**

- 1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and the rules of the TCEQ.
- 2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, in violation of 30 TEX. ADMIN. CODE § 290.46(m).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to provide forced air ventilation, which includes both high level and floor level screened and louvered vents, a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent, and a fan switch located outside, for enclosures containing more than one operating 150-pound cylinder of chlorine, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(4)(C).
- 4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to inspect the Facility's 1 MG GST annually, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(1)(A).
- 5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to maintain a thorough and up-to-date plant operations manual for operator review and reference, in violation of 30 TEX. ADMIN. CODE § 290.42(l).
- 6. As evidenced by Finding of Fact No. 2.e, the Respondent failed to monitor the disinfectant residual at representative locations in the distribution system at least once per day, in violation of 30 TEX. ADMIN. CODE § 290.110(c)(4)(B).
- 7. As evidenced by Finding of Fact No. 2.f, the Respondent failed to operate the Facility under the direct supervision of at least two water works operators who hold a Class "C" or higher license and each work at least 16 hours per month at the Facility, in violation of 30 TEX. ADMIN. CODE § 290.46(e)(4)(C) and TEX. HEALTH & SAFETY CODE § 341.033(a) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.i.
- 8. As evidenced by Finding of Fact No. 2.g, the Respondent failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation, in violation of 30 TEX. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(i)(II), (f)(3)(A)(iii), and (f)(3)(A)(iv) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.ii.
- 9. As evidenced by Finding of Fact No. 2.h, the Respondent failed to conduct an inspection of the interior of the Facility's 0.01 MG pressure tank with an inspection port at least once every five years, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(1)(B) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.iv.
- 10. As evidenced by Finding of Fact No. 2.i, the Respondent failed to have all backflow prevention assemblies tested upon installation and on an annual basis by a recognized

backflow assembly tester and certified that they are operating within specifications, in violation of 30 TEX. ADMIN. CODE § 290.44(h)(4) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.v.

- 11. As evidenced by Finding of Fact No. 2.j, the Respondent failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled, in violation of 30 TEX. ADMIN. CODE § 290.110(c)(5) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.a.vi.
- 12. As evidenced by Finding of Fact No. 2.k, the Respondent 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) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.i.
- 13. As evidenced by Finding of Fact No. 2.1, the Respondent failed to complete a CSI certificate prior to providing continuous service to new construction or any existing service when the water purveyor has reason to believe that a cross-connection or other potential contamination hazard exists, in violation of 30 TEX. ADMIN. CODE § 290.46(j) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.ii.
- 14. As evidenced by Finding of Fact No. 2.m, the Respondent failed to develop a NAP for a system distributing chloraminated water, in violation of 30 TEX. ADMIN. CODE § 290.46(z) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.iii.
- 15. As evidenced by Finding of Fact No. 2.n, the Respondent failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements, in violation of 30 TEX. ADMIN. CODE § 290.121(a) and (b) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.c.iv.
- 16. As evidenced by Finding of Fact No. 2.0, the Respondent failed to provide adequate containment facilities for all liquid chemical storage tanks, in violation of 30 TEX. ADMIN. CODE § 290.42(f)(1)(E)(ii) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.e.i.
- 17. As evidenced by Finding of Fact No. 2.p, the Respondent failed to provide a sampling tap at locations that allow for the chlorine and ammonia to be added to the water to form monochloramine as the primary species, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(7)(C) and TCEQ Agreed Order Docket No. 2018-0972-PWS-E, Ordering Provision No. 2.e.ii.

- 18. As evidenced by Finding of Fact No. 2.q, the Respondent failed to provide a device to readily determine the air-water-volume for the pressure tank, in violation of 30 TEX. ADMIN. CODE § 290.43(d)(3).
- 19. As evidenced by Finding of Fact No. 2.r, the Respondent failed to inspect the Facility's 0.01 MG pressure tank annually, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(1)(B).
- 20. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049(a), the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 21. An administrative penalty in the amount of \$140,529 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE § 341.049(b). The Respondent paid the \$140,529 penalty.

## **III. ORDERING PROVISIONS**

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 21 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Post, Docket No. 2021-0978-PWS-E" to:

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

- 2. The Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Order:
    - i. Update the Facility's operational guidance and conduct employee training to ensure that all backflow prevention assemblies are tested upon installation and on an annual basis by a recognized backflow assembly tester and certified that they are operating within specifications, in accordance with 30 TEX. ADMIN. CODE § 290.44;
    - ii. Operate the Facility under the direct supervision of two water works operators who hold a Class "C" or higher license and who each work at

least 16 hours per month at the Facility, in accordance with 30 TEX. ADMIN. CODE § 290.46;

- iii. Complete a CSI for all existing locations at which the water purveyor has reason to believe cross-connections or other potential contamination hazards exist, including but not limited to the new high school, elementary school, Jack & Jill Donuts, EMS Building, field house, and car wash, in accordance with 30 TEX. ADMIN. CODE § 290.46;
- iv. 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
- v. Begin monitoring the disinfectant residual throughout the distribution system at sites designated in the public water system's monitoring plan at least once every day, in accordance with 30 TEX. ADMIN. CODE § 290.110. This provision will be satisfied upon three months of compliant monitoring.
- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.h below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.i. through 2.a.iii.
- c. Within 60 days after the effective date of this Order:
  - i. Ensure that all backflow prevention assemblies are tested upon installation and on an annual basis by a recognized backflow assembly tester and certify that they are operating within specifications, in accordance with 30 TEX. ADMIN. CODE § 290.44;
  - ii. Adopt an adequate plumbing ordinance, regulation, or service agreement with provisions for proper enforcement to include the service connections located outside the city limits to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, including but not limited to the service locations located outside of city limits, in accordance with 30 TEX. ADMIN. CODE § 290.46; and
  - iii. Develop and maintain a chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements, in accordance with 30 TEX. ADMIN. CODE § 290.121.

- d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.h below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.c.i. through 2.c.iii.
- e. Within 90 days after the effective date of this Order, implement a CSI program to ensure all service connections are properly inspected, 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.h below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.e.
- g. Within 135 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.h 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 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.iv. 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 Lubbock Regional Office Texas Commission on Environmental Quality 5012 50th Street, Suite 100 Lubbock, Texas 79414-3426

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
- 7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 9. 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.

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

# SIGNATURE PAGE

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Custo

9/28/2022 Date

For the Executive Director

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

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

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

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

<u>4-12-2022</u> Date <u>Mayor</u> Title

SELF MARVIN Name (Printed or typed) Authorized Representative of City of Post

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