TCEQ Interoffice Memorandum

To: Mary Smith, General Counsel

Thru: △SAmy Settemeyer, Deputy Director

Enforcement Division

From: MP Michael Parrish, Team Leader

Special Functions Team

Date: June 23, 2023

Subject: Backup Revision

June 28, 2023 Commission Agenda

Item No. 19 – WOODLAKE-JOSSERAND WATER SUPPLY

CORPORATION

Docket No. 2021-0979-PWS-E

Enclosed please find the following:

Executive Summary:

• Page 5, Technical Requirements, 1.d – Corrected sub-item reference from "d.ii and d.iii" to "c.ii. and c.iii."

Agreed Order:

- Page 8, III. Ordering Provisions, 2.d. Corrected sub-item reference from "2.d.ii and 2.d.iii" to "2.c.ii. and 2.c.iii."
- Page 11, Signature Page Updated signatures provided by the Respondent and Executive Director.

Please do not hesitate to call Michael Parrish at (512) 239-2548 if you have any questions regarding this matter.

cc: Garrett Arthur, Public Interest Counsel
Melissa Schmidt, Public Interest Counsel
Gill Valls, Office of General Counsel
Katherine McKenzie, Agenda Coordinator, Litigation Division
Amy Settemeyer, Deputy Director, Enforcement Division
Melissa Cordell, Assistant Deputy Director, Enforcement Division

Rebecca Margain-Nunez, Executive Assistant, Enforcement Division

Megan Hamilton, Manager, Water Section, Enforcement Division

Miles Wehner, Enforcement Coordinator, Water Section, Enforcement Division

- c. Within 60 days:
- i. Submit written certification to demonstrate compliance with b.ii.;
- ii. 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; and
- iii. Develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference.
- d. Within 75 days, submit written certification to demonstrate compliance with c.ii. and c.iii.
- e. Within 90 days:
- i. Obtain a sanitary control easement that covers the land within 150 feet of the Facility's Well No. 1 or obtain Commission approval of an exception to the easement requirement.
- ii. Provide separate containment facilities for the gas chlorine and polyphosphate storage containers.
- f. Within 105 days, submit written certification to demonstrate compliance with e.
- g. Within 180 days:
- i. Provide an elevated storage capacity of at least 100 gallons per connection; and
- ii. Provide a well capacity of at least 0.6 gpm per connection.
- h. Within 195 days, submit written certification to demonstrate compliance with g.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Miles Wehner, Enforcement Division, Enforcement Team 5, MC 219, (512) 239-2813; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Benny Abshier, President, WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION, P.O. Box 103, Woodlake, Texas 75856

Keith Kesinger, Manager, WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION, P.O.

Box 103, Woodlake, Texas 75856

Respondent's Attorney: N/A

- photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.b.ii;
- ii. 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; and
- iii. Develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference, in accordance with 30 Tex. ADMIN. CODE § 290.42.
- d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.h below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.c. ii and 2.c. iii.
- e. Within 90 days after the effective date of this Order:
 - i. Obtain a sanitary control easement that covers the land within 150 feet of the Facility's Well No. 1, in accordance with 30 Tex. Admin. Code § 290.41, or obtain Commission approval of an exception to the easement requirement pursuant to 30 Tex. Admin. Code § 290.39(l). The exception request shall be submitted to:

Technical Review and Oversight Team Water Supply Division, MC 159 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- ii. Provide separate containment facilities for the gas chlorine and polyphosphate storage containers, in accordance with 30 TEX. ADMIN. CODE § 290.42.
- f. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.h below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.e.i and 2.e.ii.
- g. Within 180 days after the effective date of this Order:
 - i. Provide an elevated storage capacity of at least 100 gallons per connection, in accordance with 30 Tex. Admin. Code § 290.45; and

WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION DOCKET NO. 2021-0979-PWS-E Page 11

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
1.5	6/23/2023
For the Director	Date
the attached Order, and I do agree to the terms	the attached Order. I am authorized to agree to and conditions specified therein. I further nent for the penalty amount, is materially relying
I also understand that failure to comply with the and/or failure to timely pay the penalty amount	
 additional penalties, and/or attorney fees Increased penalties in any future enforcer 	ns submitted; ral's Office for contempt, injunctive relief, , or to a collection agency; ment actions; al's Office of any future enforcement actions; and
In addition, any falsification of any compliance	documents may result in criminal prosecution.
Signature Signature	6-22-23 Date
Name (Printed or typed) Authorized Representative of WOODLAKE-JOSSERAND WATER SUPPLY C	Mayager Title
	ck this box and provide the new address below

Executive Summary - Enforcement Matter - Case No. 52923 WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION RN101452621

Docket No. 2021-0979-PWS-E

Order Type:

Findings Agreed Order

Findings Order Justification:

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

Media:

PWS

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Woodlake-Josserand WSC, 3908 East U.S. Highway 287 near Groveton, Trinity 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: April 7, 2023

Comments Received: No

Penalty Information

Total Penalty Assessed: \$14,415

Total Paid to General Revenue: \$14,415

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

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

Major Source: No

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 24, 2021 through May 28, 2021 and on June 14, 2021

and October 12, 2021

Date(s) of NOE(s): June 7, 2019, July 9, 2021, and December 10, 2021

Violation Information

- 1. Failed to mail or directly deliver one copy of the Consumer Confidence Report ("CCR") to each bill paying customer by July 1 for each year, and failed to submit to the TCEQ by July 1 for each year a copy of the annual CCR and certification that the CCR has been distributed to the customers of the Facility and that the information in the CCR is correct and consistent with compliance monitoring data [30 Tex. ADMIN. CODE §§ 290.271(b) and 290.274(a) and (c)].
- 2. Failed to provide a consumer notification of lead tap water monitoring results to persons served at the sites (taps) that were tested, and failed to mail a copy of the consumer notification of tap results to the Executive Director ("ED") along with certification that the consumer notification was distributed in a manner consistent with TCEQ requirements [30 Tex. Admin. Code § 290.117(i)(6) and (j) and TCEQ Agreed Order Docket No. 2019-0836-PWS-E, Ordering Provision No. 2.a.i].
- 3. Failed to provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the ED regarding the failure to comply with the maximum contaminant level ("MCL") for total trihalomethanes ("TTHM") based on the locational running annual average [TCEQ Agreed Order Docket No. 2019-0836-PWS-E, Ordering Provision No. 2.a.ii].
- 4. Failed to provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the ED regarding the failure to submit a written operation evaluation report to the ED within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for Stage 2 Disinfection Byproducts ("DBP2") [TCEQ Agreed Order Docket No. 2019-0836-PWS-E, Ordering Provision No. 2.a.ii].
- 5. Failed to inspect the Facility's elevated storage tank ("EST") annually [30 Tex. Admin. Code § 290.46(m)(1)(A)].
- 6. Failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies [30 Tex. ADMIN. CODE § 290.46(n)(2)].
- 7. Failed to issue a boil water notification to the customers of the Facility using the applicable language and prescribed format specified in 30 Tex. Admin. Code § 290.47(c)(1) [30 Tex. Admin. Code § 290.46(q)(1)].
- 8. Failed to provide separate containment facilities for chemicals that are incompatible [30 Tex. ADMIN. CODE § 290.42(f)(1)(E)(ii)(IV)].
- 9. 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)].

- 10. Failed to provide a well capacity of 0.6 gallon per minute ("gpm") per connection [30 Tex. Admin. Code § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c)].
- 11. Failed to maintain water works operation and maintenance records and make them readily available for review by the ED upon request [30 Tex. Admin. Code § 290.46(f)(2) and (f)(3)(D)(ii)].
- 12. Failed to maintain a thorough and up-to-date plant operations manual for operator review and reference [30 Tex. ADMIN. CODE § 290.42(l)].
- 13. Failed to use an acceptable analytical method for disinfectant analyses [30 Tex. Admin. Code § 290.119(b)(7)].
- 14. Failed to maintain an up-to-date chemical and microbiological monitoring plan that is subject to the review and approval of the ED, and a copy of which is maintained at each water treatment plant and at a central location [30 Tex. ADMIN. CODE § 290.121(a) and TCEQ Agreed Order Docket No. 2018-1552-PWS-E, Ordering Provision No. 2.a.i].
- 15. Failed to obtain a sanitary control easement that covers the land within 150 feet of the Facility's wells [30 Tex. Admin. Code § 290.41(c)(1)(f) and TCEQ Agreed Order Docket No. 2018-1552-PWS-E, Ordering Provision No. 2.c].
- 16. Failed to provide an elevated storage capacity of 100 gallons per connection [30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(iv) and Tex. Health & Safety Code § 341.0315(c)].
- 17. 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)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By October 12, 2021, the Respondent began maintaining water works operation and maintenance records at the Facility.

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days:
- i. Mail or directly deliver one copy of the CCR prepared using the compliance data for the most recent calendar year to each bill paying customer and make a good faith effort to deliver the CCR to non-bill paying customers;

- ii. Provide consumer notification of lead tap water monitoring results to persons served at all sites (taps) that were tested during the January 1, 2020 through December 31, 2020 monitoring period. Submit to the ED a sample copy of the consumer notification and certification that consumer notification was distributed in a manner consistent with TCEQ requirements;
- iii. Provide public notification and submit a copy of each public notification, accompanied with a signed Certificate of Delivery, to the ED regarding the failure to comply with the MCL for TTHM based on the locational running annual average for the second quarter of 2017 through the fourth quarter of 2018 and the failure to submit a written operation evaluation report to the ED within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for DBP2 at Site 1 and Site 2 during the fourth quarter of 2017;
- iv. Implement procedures to ensure that all necessary public notifications are provided in a timely manner to persons served by the Facility and that a copy of the public notification, accompanied with a signed Certificate of Delivery, is submitted to the ED;
- v. Conduct an inspection of the Facility's EST;
- vi. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies;
- vii. Develop and begin maintaining a written protocol that is to be followed to ensure boil water notifications are provided to customers in the specified format and provided to the ED within 24 hours or no later than the next business day after issuance;
- viii. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including repairing the seam of the roof and siding of the ground storage tank at Plant No. 1, the well casing for Well No. 1, the generators at Plant Nos. 1 and 2, and the sample tap connected to the feet-of-water gauge; and
- ix. Update the Facility's operational guidance and conduct employee training to ensure that the LaMotte 1200 series colorimeter is being operated with LaMotte DPD reagents.
- b. Within 45 days:
- i. Submit written certification to demonstrate compliance with a.; and
- ii. Submit to the Commission a copy of the CCR provided to customers of the Facility and the certification that the CCR has been provided to the customers of the Facility and that the information in the CCR is correct and consistent with the compliance monitoring data.

- c. Within 60 days:
- i. Submit written certification to demonstrate compliance with b.ii.;
- ii. 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; and
- iii. Develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference.
- d. Within 75 days, submit written certification to demonstrate compliance with d.ii. and d.iii.
- e. Within 90 days:
- i. Obtain a sanitary control easement that covers the land within 150 feet of the Facility's Well No. 1 or obtain Commission approval of an exception to the easement requirement.
- ii. Provide separate containment facilities for the gas chlorine and polyphosphate storage containers.
- f. Within 105 days, submit written certification to demonstrate compliance with e.
- g. Within 180 days:
- i. Provide an elevated storage capacity of at least 100 gallons per connection; and
- ii. Provide a well capacity of at least 0.6 gpm per connection.
- h. Within 195 days, submit written certification to demonstrate compliance with g.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Miles Wehner, Enforcement Division, Enforcement Team 5, MC 219, (512) 239-2813; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Benny Abshier, President, WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION, P.O. Box 103, Woodlake, Texas 75856

Keith Kesinger, Manager, WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION, P.O.

Box 103, Woodlake, Texas 75856 **Respondent's Attorney:** N/A



Penalty Calculation Worksheet (PCW)

OF THE PORMENTAL CULT	Policy Revi	ision 5 (January 28, 2	2021)			•	PCW Revision February	11, 2021
DATES	Assigned	12-Jul-2021						
	PCW	26-Jul-2021	Screening	21-Jul-2021	EPA Due			
RESPONDE	NT/FACILI	TY INFORMATION	ON					_
Re	espondent	WOODLAKE-JOS	SERAND WA	ATER SUPPLY CO	RPORATION (F	PCW No. 1)		
		RN101452621						
Facility/Si	ite Region	10-Beaumont			Major/I	Minor Source	Minor	
CASE INFO	RMATION							_
Enf./Ca	se ID No.	52923			No.	of Violations	2	
D	ocket No.	2021-0979-PWS	-E			Order Type	Findings	
		Public Water Sup	ply		Government/Non-Profit Yes			
M	ulti-Media				Enf. Coordinator Miles Wehner			
	_	_	·			EC's Team	Enforcement Team 8	
Admin.	Penalty \$ L	imit Minimum.	\$50	Maximum	\$5,000			-

			Penalty	Calcula	ition Sectio	n		
TOTA	L BASE PENA	LTY (Sum of	violation ba	se penal	ties)		Subtotal 1	\$4,000
ADJU	STMENTS (+	/-) TO SUBT	OTAL 1					
71255	Subtotals 2-7 are of	otained by multiplying	g the Total Base Pena		1) by the indicated p		-	
	Compliance Hi	story		45.0%	otals 2, 3, & 7	\$1,800		
	Notes		for one agreed o ne agreed order v		ning a denial of li enial of liability.	ability and		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Re	spondent does n	ot meet the	e culpability crite	ria.		
	Good Faith Eff	ort to Comply T	otal Adjustmer	nts			Subtotal 5	\$0
			Juliu I Iu Juliu III I					7.5
	Economic Ben	ofit .		n nº/ ₀	Enhancement*		Subtotal 6	\$0
		Total EB Amounts Cost of Compliance	\$48 \$300		ed at the Total EB \$ A	mount		40
SUM	OF SUBTOTA	LS 1-7				I	Final Subtotal	\$5,800
OTHE	R FACTORS A	AS JUSTICE N	1AY REOUIRI	E	0.0%		Adjustment	\$0
	or enhances the Fina		•					·
	Notes							
						Final Pe	nalty Amount	\$5,800
STAT	UTORY LIMIT	T ADJUSTMEI	TV			Final Asse	essed Penalty	\$5,800
DEFE	RRAL				0.0%	Reduction	Adjustment	\$0
Reduces	the Final Assessed Pe	enalty by the indicate	d percentage.					·
	Notes	No o	deferral is recomi	mended for	Findings Orders.			
PAYA	BLE PENALT	Y						\$5,800

Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 1)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Case ID No. 52923

Reg. Ent. Reference No. RN101452621

Media Public Water Supply

Enf. Coordinator Miles Wehner

Component	ory Site Enhancement (Subtotal 2) Number of	Number	Adjust.				
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%				
	Other written NOVs	0	0%				
	Any agreed final enforcement orders containing a denial of liability (<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	1	25%				
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%				
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%				
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%				
Emissions	Chronic excessive emissions events (number of events)	0	0%				
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%				
Audits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%				
	Environmental management systems in place for one year or more	No	0%				
	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%				
enest Violeter	Adjustment Pero	centage (Sul	btotal 2)				
epeat Violator							
N/A	 ,	entage (Sul	ototai 3)				
ompliance Hist	ory Person Classification (Subtotal 7)						
N/A	Adjustment Perc	entage (Sul	ototal 7)				
mpliance Hist	ory Summary						
Compliance History Notes	Enhancement for one agreed order containing a denial of liability and one agreed order denial of liability.	order without a					
	Total Compliance History Adjustment Percentage (S	Subtotals 2.	- . <i>3,</i> & <i>7</i>)				
Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) $-4!$ inal Compliance History Adjustment							
al Compliance	History Adjustment						

	Screening Date				et No. 2021-0979-PWS-E		PCW
	Respondent	WOODLAKE-JOSS	ERAND WA	TER SUPPLY CO	RPORATION (PCW No. 1)	Policy Re	evision 5 (January 28, 2021)
	Case ID No.	52923				PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN101452621					
	Media	Public Water Supp	oly				
	Enf. Coordinator	Miles Wehner					
	Violation Number	1					
	Rule Cite(s)	TCEQ Agreed Ord	der Docket	No. 2019-0836	-PWS-E, Ordering Provision N	lo. 2.a.ii	
		accompanied v	with a signe	ed Certificate of	omit a copy of the public noti Delivery, to the Executive Di ximum contaminant level ("N	rector	
	average cifically, ded by for the ne 20, uarter of 9 for the						
					Base	Penalty	\$5,000
>> Env	vironmental, Prope	erty and Humar		Matrix			
	Release	Major N	Harm	Minor			
OR	Actua		Moderate	Minor			
	Potentia				Percent 0.0%		
>>Pro	grammatic Matrix						
	Falsification		Moderate	Minor			
		X			Percent 10.0%		
	Matrix						
	Matrix Notes	100%	of the rule	requirements w	ere not met.		
					Adjustment	\$4,500	
					Adjustment	\$4,500	¢500
					Adjustment	\$4,500	\$500
Violatio	on Events				Adjustment	\$4,500	\$500
Violatio							\$500
Violatio		Violation Events	7		Adjustment Number of violation of		\$500
Violatio		_	7				\$500
Violatio		daily	7				\$500
Violatio		daily weekly	7				\$500
Violatio		daily weekly monthly	7		1409 Number of violation o	days	
Violatio		daily weekly	7			days	\$500 \$3,500
Violatio		daily weekly monthly quarterly semiannual annual	7		1409 Number of violation o	days	
Violatio		daily weekly monthly quarterly semiannual	7 		1409 Number of violation o	days	
Violatio		daily weekly monthly quarterly semiannual annual single event	7 X ents are rec		1409 Number of violation o	days	
	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve			Number of violation of Violation of Violation Base of Property of the Property	days Penalty	\$3,500
		daily weekly monthly quarterly semiannual annual single event Seven single eve	0.0%	ommended, on	Number of violation of Violation of Violation Base of the for each notification.	days	
	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve	0.0%		Number of violation of Violation of Violation Base of the for each notification.	days Penalty	\$3,500
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	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve	0.0%	ommended, on	Number of violation of Violation of Violation Base of the for each notification.	days Penalty	\$3,500
	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve Ply Extraordinary Ordinary N/A	0.0% re NOE/NOV	NOE/NOV to EDPR	Violation Base e for each notification.	days Penalty	\$3,500
	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve Ply Extraordinary Ordinary N/A	0.0% re NOE/NOV	NOE/NOV to EDPR	Violation Base e for each notification. P/Settlement Offer leet the good faith criteria	days Penalty	\$3,500
	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve Ply Extraordinary Ordinary N/A	0.0% re NOE/NOV	NOE/NOV to EDPR	Violation Base e for each notification. P/Settlement Offer leet the good faith criteria	days Penalty	\$3,500
	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve Ply Extraordinary Ordinary N/A	0.0% re NOE/NOV	NOE/NOV to EDPR	Violation Base e for each notification. P/Settlement Offer leet the good faith criteria	days Penalty deduction	\$3,500
Good F	Number of	daily weekly monthly quarterly semiannual annual single event Seven single eve Ply Extraordinary Ordinary N/A Notes T	0.0% re NOE/NOV X The Respond	NOE/NOV to EDPR	Violation Base e for each notification. P/Settlement Offer eet the good faith criteria olation.	days Penalty deduction	\$3,500 \$0
Good F	Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event Seven single eve Ply Extraordinary Ordinary N/A Notes T	0.0% re NOE/NOV X The Respond	NOE/NOV to EDPR	Violation of Violation of Violation of Violation Base of Property of the Grand Property	Penalty Leduction Subtotal	\$3,500 \$0
Good F	Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event Seven single eve Seven single eve Seven single eve This violation sed EB Amount	0.0% re NOE/NOV x The Respond	NOE/NOV to EDPRI	Violation Base e for each notification. P/Settlement Offer leet the good faith criteria olation. Violation Statutory Limit	Penalty days Subtotal Test Ity Total	\$3,500

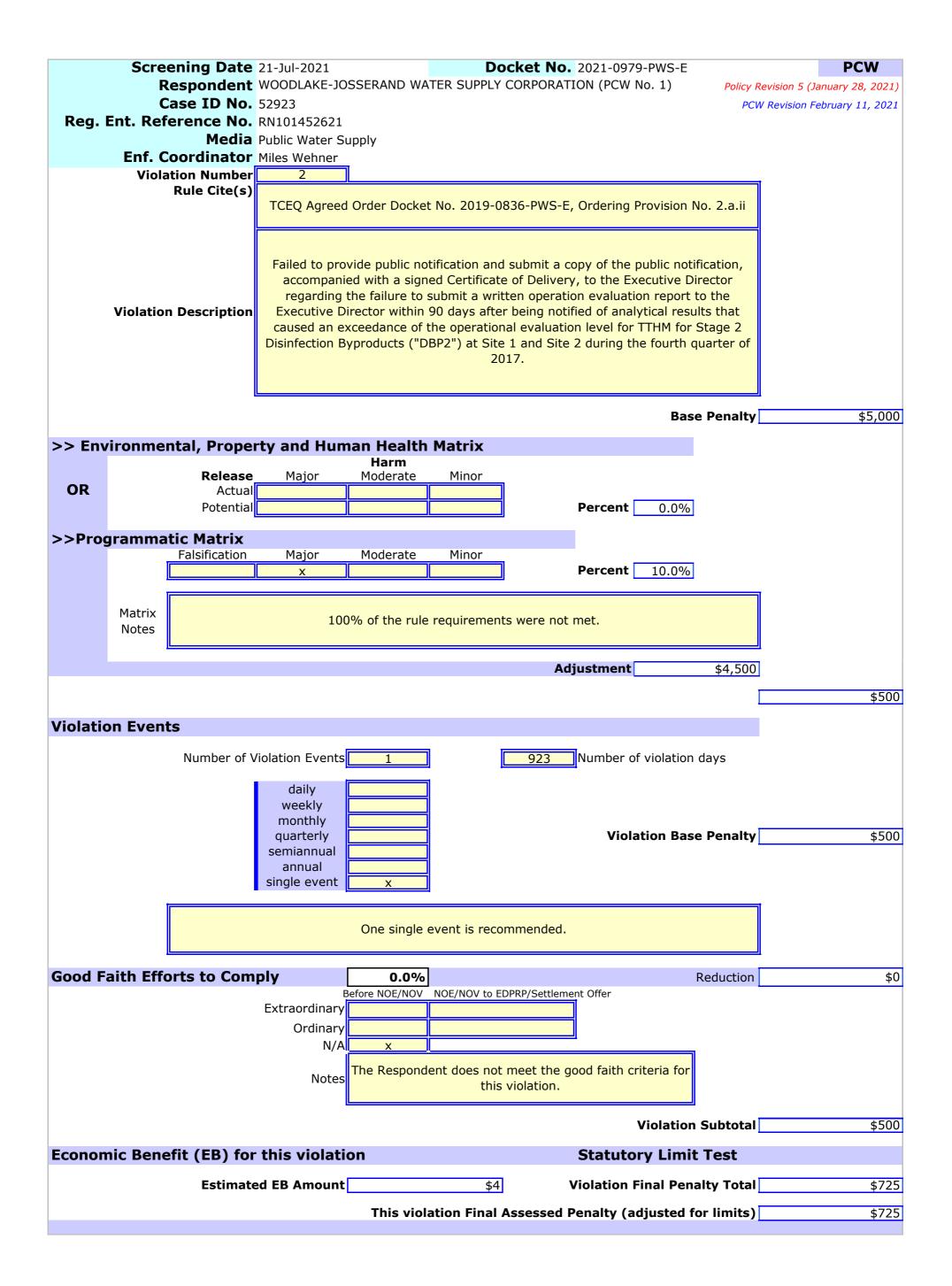
Economic Benefit Worksheet Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 1) **Case ID No.** 52923 Reg. Ent. Reference No. RN101452621 Media Public Water Supply Years of **Percent Interest Violation No.** 1 **Depreciation** 5.0 15 **Item Cost** Date Required **Final Date** Yrs Interest Saved **Costs Saved EB Amount Item Description Delayed Costs** Equipment 0.00 \$0 \$0 \$0 Buildings 0.00 <u>\$0</u> \$0 <u>\$0</u> Other (as needed) 0.00 \$0 \$0 \$0 **Engineering/Construction** 0.00 \$0 \$0 \$0 0.00 n/a 0.00 **Record Keeping System** \$0 \$0 n/a \$100 6-Mar-2020 23-May-2023 **Training/Sampling** 3.21 \$16 n/a \$16 Remediation/Disposal 0.00 n/a \$0 0.00 **Permit Costs** \$0 n/a \$0 \$175 6-Mar-2020 23-May-2023 Other (as needed) n/a The Training/Sampling delayed cost includes the estimated amount to implement procedures to ensure that all necessary public notifications are provided in a timely manner, calculated from the effective date of TCEQ Agreed Order Docket No. 2019-0836-PWS-E to the estimated date of compliance. The Other (as needed) delayed cost includes the estimated amount to ensure that all delinquent public **Notes for DELAYED costs** notifications (\$25 per notification x seven missed notifications) are provided to persons served by Facility and a copy of the public notification, accompanied with a signed Certificate of Delivery, is submitted to the Executive Director, calculated from the effective date of TCEQ Agreed Order Docket No. 2019-0836-PWS-E to the estimated date of compliance. ANNUALIZE avoided costs before entering item (except for one-time avoided costs) **Avoided Costs** Disposal 0.00 \$0 \$0 Personnel \$0 \$0 \$0 0.00Inspection/Reporting/Sampling 0.00 \$0 \$0 \$0 Supplies/Equipment 0.00 \$0 \$0 \$0 **Financial Assurance** 0.00 \$0 **ONE-TIME** avoided costs 0.00 \$0 \$0 \$0 Other (as needed) 0.00 \$0 **Notes for AVOIDED costs**

\$275

TOTAL

\$44

Approx. Cost of Compliance



	Economic Benefit Worksheet									
the contract of the contract o		SSERAND WATER	R SUPPLY CORPO	DRATIO	N (PCW No. 1)					
Case ID No.										
Reg. Ent. Reference No. Media Violation No.	Public Water S	upply				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		1		0.00	40	40	# 0			
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0			
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0			
Engineering/Construction				0.00	\$0	\$0 \$0	\$0 \$0			
Land				0.00	\$0	n/a	\$0			
Record Keeping System				0.00	\$0	n/a	\$0			
Training/Sampling				0.00	\$0	n/a	\$0			
Remediation/Disposal				0.00	\$0	n/a	\$0			
Permit Costs				0.00	\$0	n/a	\$0			
Other (as needed)	\$25	6-Mar-2020	23-May-2023	3.21	\$4	n/a	\$4			
Notes for DELAYED costs	The Other (a notification (\$ of the public Director, cal	The Training/Sampling delayed costs for implementing procedures to ensure that all necessary public notifications are provided in a timely manner, is captured in the Economic Benefit Worksheet for Violation No. 1 on PCW No. 1. The Other (as needed) delayed cost includes the estimated amount to ensure that the delinquent public notification (\$25 per notification x one notification) is provided to persons served by the Facility and a copy of the public notification, accompanied with a signed Certificate of Delivery, is submitted to the Executive Director, calculated from the effective date of TCEQ Agreed Order Docket No. 2019-0836-PWS-E to the estimated date of compliance.								
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoided	_			
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0			
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0			
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0			
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0			
ONE-TIME avoided costs				0.00	\$0	\$0	\$0			
Other (as needed)				0.00	\$0	\$0 \$0	\$0			
Notes for AVOIDED costs										
Approx. Cost of Compliance		\$25			TOTAL		\$4			



Notes

PAYABLE PENALTY

Penalty Calculation Worksheet (PCW)

\$1,450

	1 C	mancy carcaracie			
Policy Re	vision 5 (January 28, .	2021)		PCW Revision F	ebruary 11, 2021
DATES Assigned	1-Jun-2021				
PCW	26-Jul-2021	Screening 21-Jul-2021	EPA Due		
RESPONDENT/FACIL	ITY INFORMATI	ON			
Respondent	WOODLAKE-JOS	SERAND WATER SUPPLY C	ORPORATION (PCW No. 2)		
Reg. Ent. Ref. No.	RN101452621				
Facility/Site Region	10-Beaumont		Major/Minor Source	e Minor	
CASE INFORMATION					
Enf./Case ID No.			No. of Violation		
	2021-0979-PWS		Order Type		
Media Program(s)		oply	Government/Non-Profi		
Multi-Media			Enf. Coordinato		
	-			Enforcement Team	8
Admin. Penalty \$	Limit Minimum	\$50 Maximum	\$5,000		
		Penalty Calcula	ation Section		
		•			
IOIAL BASE PENA	ALIY (Sum of	violation base pena	ities)	Subtotal 1	\$1,000
	/ > === ====				
ADJUSTMENTS (+	·/-) TO SUBTO	OTAL 1			

			Penaity C	Jaicula	don Secu	ווע				
TOTA	L BASE PENA	LTY (Sum o	f violation bas	e penal	ties)		Subtotal 1	\$1,000		
ADJU	STMENTS (+	/-) TO SUBT	FOTAL 1 ng the Total Base Penalt	v (Subtotal	1) by the indicated r	percentage				
	Compliance Hi		ng the rotal base renale	45.0%			tals 2, 3, & 7	\$450		
	Notes Enhancement for one agreed order containing a denial of liability and one agreed order without a denial of liability.									
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0		
	Notes	The R	espondent does not	t meet the	culpability crite	ria.				
	Good Faith Eff	ort to Comply	Total Adjustment	S			Subtotal 5	\$0		
			_							
	Economic Ben	efit Total EB Amounts			Enhancement*	A	Subtotal 6	\$0		
	Estimated	Cost of Compliance		<i>«Сарре</i>	d at the Total EB \$ A	Amount				
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$1,450		
			MAY REQUIRE		0.0%		Adjustment	\$0		
Reduces	or enhances the Fina Notes	Subtotal by the inc	dicated percentage.							
						Final Per	alty Amount	\$1,450		
STATI	UTORY LIMIT	Γ ADJUSTME	NT			Final Asse	ssed Penalty	\$1,450		
DEFE	·				0.0%	Reduction	Adjustment	\$0		
Reduces t	the Final Assessed Pe	enalty by the indicat	ed percentage.				 1			

No deferral is recommended for Findings Orders.

Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 2)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Case ID No. 52923

Reg. Ent. Reference No. RN101452621

Media Public Water Supply

Enf. Coordinator Miles Wehner

	Compliance History Worksheet		
Compliance Hist Component	ory <i>Site</i> Enhancement (Subtotal 2) Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Addito	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%
D	Adjustment Pero	centage (Sub	ototal 2) 4
Repeat Violator			_
N//	 ,	centage (Sub	total 3) 🗀 0
Compliance Hist	ory Person Classification (Subtotal 7) Adjustment Pero	centage (Sub	ototal 7)
Compliance Hist		centage (Sub	(Clair 7)
Compliance History Notes	Enhancement for one agreed order containing a denial of liability and one agreed of denial of liability.	order without a	
- : 10 !:	Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7) 4

Final Adjustment Percentage *capped at 100%

9	Screening Date	21-Jul-2021	Docket	No. 2021-0979-PWS-E	PCW
	Respondent	WOODLAKE-JOSSERAN	D WATER SUPPLY CORPO	DRATION (PCW No. 2)	Policy Revision 5 (January 28, 2021)
	Case ID No.	52923			PCW Revision February 11, 2021
Reg. Ent.	Reference No.	RN101452621			
		Public Water Supply			
Eı	nf. Coordinator				
	Violation Number				
	Rule Cite(s)	30 Tex. Adr	nin. Code §§ 290.271(b)	and 290.274(a) and (c)	
				the Consumer Confidence Re	
				for each year, and failed to she annual CCR and certificati	
Vio	lation Description	- , ,		ners of the Facility and that t	
				nt with compliance monitorin	
			for the calendar year	•	9
			,		
				Base I	Penalty \$5,000
S Employer	montal Drange	tu and Human Ha	ith Matrice		
>> Environ	ımentai, Proper	ty and Human Hea Har			
	Release	Har Major Moder			
OR	Actual				
	Potential			Percent 0.0%	
	'				
>>Program	nmatic Matrix				
	Falsification	Major Moder	ate Minor	-	
		Х		Percent 10.0%	
Mat	trix	1000/ of the		, mat mad	
No	tes	100% or the	e rule requirements were	e not met.	
				Adjustment	\$4,500
					+ 1/300
					\$500
\/:-!-!: F-					
Violation Ev	vents				
	Number of \	/iolation Events 1	38	Number of violation da	VS
	Trainibel of t	Toldelon Evenes 1		itamber of violation da	,,,
		daily			
		weekly			
		monthly			
		quarterly		Violation Base I	Penalty \$500
		semiannual			
		annual x			
		single event x			
		One si	ngle event is recommen	ded.	
					
Good Faith	Efforts to Comp		0.0%		duction \$0
		Before NOI	E/NOV NOE/NOV to EDPRP/Se	ettlement Offer	
		Extraordinary			
		Ordinary			
		N/A x			
		The Res	pondent does not meet	the good faith criteria for	
		Notes	this violat		
				Violation S	ubtotal \$500
Economic B	Benefit (EB) for	this violation		Statutory Limit To	est
	P = 4 * *	ad ED Amazont	#222	Violeties Fire I Berni	Total +725
	Estimate	ed EB Amount	\$223	Violation Final Penalt	y Total \$725
		This	s violation Final Asses	sed Penalty (adjusted for	limits) \$725

	E	conomic	Benefit	Woı	ksheet			
Respondent Case ID No. Reg. Ent. Reference No.	52923	OSSERAND WATE	R SUPPLY CORP	ORATIO	N (PCW No. 2)			
	Public Water S	upply				Percent Interest	Years of Depreciation	
						5.0	15	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount	
Item Description								
Dalassa d Canta								
Delayed Costs	<u> </u>	1		1 0 00	Ι 40	L +0	#0	
Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
Engineering/Construction Land				0.00	\$0 \$0	n/a	\$0 \$0	
Record Keeping System				0.00	\$0 \$0	n/a	\$0 \$0	
Training/Sampling				0.00	\$0 \$0	n/a	\$0 \$0	
Remediation/Disposal				0.00	\$0	n/a	\$0 \$0	
Permit Costs				0.00	\$0	n/a	\$0 \$0	
Other (as needed)	\$198	1-Jul-2021	20-Dec-2022	1.47	\$15	n/a	\$15	
Notes for DELAYED costs	the customer	s of the Facility a	nd to the TCEQ	[((\$0.5	0×296 connection	directly deliver thens) + \$50) x one ye didate of compliance	ar], calculated	
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	¢100	1 1.1 2020	21 7.1 2021	0.00	\$0	\$0	\$0 #208	
Other (as needed) \$198								
Approx. Cost of Compliance		\$396			TOTAL		\$223	

	Screening			ACCED AND WAT		cet No. 2021-0979-PWS-E		PCW
	•	naent \ ID No. :		SSERAND WAT	ER SUPPLY CO	RPORATION (PCW No. 2)	•	evision 5 (January 28, 2021)
Rea	Ent. Reference						PCVI	/ Revision February 11, 2021
Keg.			Public Water S	upply				
	Enf. Coordi							
	Violation N]				
	Rule	Cite(s)	30 Tex. Admi	_	` , ` ,	j) and TCEQ Agreed Order I ng Provision No. 2.a.i	Docket No.	
		-	Failed to pro			of lead tap water monitoring	results to	
			persons served	d at the sites (t	aps) that were	tested, and failed to mail a	copy of the	
	Violation Desc	ription			•	the Executive Director along was distributed in a manner		
						was distributed in a manner 1, 2020 through December 3		
			-	<u>'</u>	monitoring	•	,	
						Ва	se Penalty	\$5,000
>> Fnv	vironmental, I	Proper	tv and Hun	nan Health	Matrix			
				Harm				
OR	R	Release Actual	Major	Moderate	Minor			
OK	P	Potential				Percent 0.0%		
				1		010 /	21	
>>Pro	grammatic Ma		N4 :	N4 1	N4:			
	Faisir	fication	Major x	Moderate	Minor	Percent 10.0%	,	
				<u> </u>		10.070	2]	
	Matrix							
	Notes		100	0% of the rule	requirements v	vere not met.		
						Adjustment	\$4,500	
							Г	\$500
								Ψ300
Violatio	on Events							
	Num	nber of Vi	iolation Events	1		202 Number of violatio	n days	
			daily weekly					
			monthly					
			quarterly			Violation Ba	se Penalty	\$500
			semiannual annual					
			single event	Х				
				One single e	vent is recomr	nended		
				0110 5111g.c c		Torradar		
Good E	aith Efforts to	o Comr	alv	0.0%			Reduction	\$0
Good F	aitii Eiioits to	o Comp		Before NOE/NOV	NOE/NOV to EDPR	P/Settlement Offer	Reduction	φυ
			Extraordinary		,			
			Ordinary					
			N/A	X			1	
			Notes	The Responde	ent does not me this vio	eet the good faith criteria for	-	
					tills vic	nacion.		
						Violatio	n Subtotal	\$500
Econor	nic Benefit (E	B) for	this violati	on		Statutory Lim	it Test	
	E	stimate	d EB Amount		\$8	Violation Final Pe	nalty Total	\$725
				This viol	ation Final Ac	sessed Penalty (adjusted	for limits)	\$725
				THE VIOL	acion i iliai As	Jesseu i charty (aujusteu		φ/23

	E	conomic	Benefit	WOI	'ksheet		
Respondent	WOODLAKE-JO	SSERAND WATER	R SUPPLY CORPO	DRATIO	N (PCW No. 2)		
Case ID No.					()		
Reg. Ent. Reference No.							
		Common Inc.					Varue of
	Public Water S	uppiy				Percent Interest	Years of
Violation No.	2						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs					T 10		1.0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	+ = =	21 5 2020	4.11 2022	0.00	\$0	n/a	\$0
Other (as needed)	\$55	31-Dec-2020	4-Nov-2023	2.84	\$8	n/a	\$8
Notes for DELAYED costs	January 1, 2 were san	020 through Dece opled and to the T	mber 31, 2020 CEQ ((\$0.50 x t	monitor en sam	ing period to pers pled locations + \$	he consumer notificons served at the lo 50) x one monitorinestimated date of co	cations which g period),
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$55			TOTAL		\$8



Penalty Calculation Worksheet (PCW)

ZURONMENTAL O	Policy Rev	vision 5 (January 28,	2021)				PCW Revision F	ebruary 11, 2021
DATES	Assigned PCW		Screening	21-Jul-2021	EPA Due			
	PCW	20 Jul 2021	Screening	<u> </u>	LFA Due			
RESPO	NDENT/FACILI							
	Respondent	WOODLAKE-JOS	SSERAND WA	ATER SUPPLY CO	DRPORATION (PCW	/ No. 3)		
	g. Ent. Ref. No.						I	
Facili	ty/Site Region	10-Beaumont			Major/Min	or Source	Minor	
CASE I	NFORMATION							
En	f./Case ID No.	52923			No. of \	Violations	1	
		2021-0979-PWS				rder Type		
Med	dia Program(s)		pply		Government/N			
	Multi-Media						Miles Wehner	
			L = 0	¬		C's Team	Enforcement Team	8
Adı	min. Penalty \$	Limit Minimum	\$50	Maximum	\$1,000			
			Pena	Ity Calcula	tion Section)		
TOTA	L BASE PENA	ALTY (Sum of		•			Subtotal 1	\$100
		()		P C C C	,			,
ADJU	STMENTS (+	/-) TO SUBT	OTAL 1					
	Subtotals 2-7 are of	btained by multiplyin	g the Total Bas		1) by the indicated per			
	Compliance Hi	story		45.0%	Adjustment	Subto	tals 2, 3, & 7	\$45
		Enhancement	for one agre	and order contai	ning a denial of lial	hility and		
	Notes		•	der without a de	•	onicy and		
			ne agreed or	der without a de	silial of liability.			
	Code a bilitar	N.	1	0.00/			Cubtatal 4	#0
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Re	esnondent da	nes not meet the	e culpability criteria	9		
	Notes	THE R	espondent de	oes not meet tin	culpublicy criterio	4.		
	0-15 11 50		F-4-1 A 1'				College 15	1.0
	Good Faith Eff	ort to Comply	ı otal Adjus	tments			Subtotal 5	\$0

\$0 Economic Benefit 0.0% Enhancement* Subtotal 6 \$219 \$198 Total EB Amounts *Capped at the Total EB \$ Amount Estimated Cost of Compliance

SUM OF SUBTOTALS 1-7 Final Subtotal \$145 OTHER FACTORS AS JUSTICE MAY REQUIRE 0.0% Adjustment **\$0**

Reduces or enhances the Final Subtotal by the indicated percentage. Notes

STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty \$145

Final Penalty Amount

\$145

DEFERRAL 0.0% **\$0** Reduction Adjustment Reduces the Final Assessed Penalty by the indicated percentage.

No deferral is recommended for Findings Orders. Notes

PAYABLE PENALTY \$145

Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 3)

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

Case ID No. 52923

Reg. Ent. Reference No. RN101452621

Media Public Water Supply

Enf. Coordinator Miles Wehner

	Compliance History Worksheet		
Compliance Hist Component	ory <i>Site</i> Enhancement (Subtotal 2) Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<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 (number of audits for which violations were disclosed)	0	0%
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
Repeat Violator	Adjustment Pero	centage (Sub	ototal 2)
N/A	·	centage (Sub	total 3)
	ory Person Classification (Subtotal 7)	- '	,
N/A	Adjustment Per	centage (Sub	total 7)
Compliance Hist	ory Summary		
Compliance History Notes	Enhancement for one agreed order containing a denial of liability and one agreed denial of liability.	order without a	
Final Compliance	Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7)

Final Adjustment Percentage *capped at 100%

	Screening Da	te 21-Jul-2021	Doc	ket No. 2021-0979-PWS-E	PCW
	Responde	ent WOODLAKE-JOSS	SERAND WATER SUPPLY C	ORPORATION (PCW No. 3)	Policy Revision 5 (January 28, 2021)
	Case ID N	lo. 52923			PCW Revision February 11, 2021
Reg.	Ent. Reference N	lo. RN101452621			, ,
	Med	lia Public Water Supp	ylq		
	Enf. Coordinat		,		
	Violation Num	ber 1			
	Rule Cite	(e)			
	Rule Cite	30 Te	ex. Admin. Code §§ 290.2	71(b) and 290.274(a) and (c)	
		Failed to mail	an dinastly daliyan ana sa	ov of the Congumen Confidence D	an aut
				by of the Consumer Confidence Ruly 1 for each year, and failed to	
		to the TCEO by 1		of the annual CCR and certificat	
	Violation Descript	IODII - ·		ustomers of the Facility and that	
		information in the	he CCR is correct and con	sistent with compliance monitoring	ng data
			for the calenda	ar year 2018.	
				Page	Domaltus #1 000
				Base	Penalty \$1,000
>> Env	vironmental, Proj	erty and Human	n Health Matrix		
			Harm		
0.5	Relea		Moderate Minor		
OR		cual			
	Poter	tial		Percent 0.0%	
>> Dro	grammatic Matrix	•			
PIO	grammatic Matrix Falsificati		Moderate Minor		
	Taisincati	X Y	14loderate 14lillor	Percent 10.0%	
		^		101070	
	Matrix	100%	of the rule requirements	were not met.	
	Notes		·		
				Adjustment	\$900
					\$100
					Ψ100
Violatio	on Events				
	Number	of Violation Events	1	751 Number of violation da	ays
		daily			
		daily weekly			
		monthly			
		quarterly		Violation Base	Penalty \$100
		semiannual			-
		annual			
		single event	X		
			One single event is recom	nmended	
			one single event is recoil	c.iacai	
Good F	aith Efforts to Co	mply	0.0%	Re	eduction \$0
		Bef	fore NOE/NOV NOE/NOV to ED	PRP/Settlement Offer	
		Extraordinary			
		Ordinary			
		N/A	Х	_	
		TI	he Respondent does not r	meet the good faith criteria for	
		Notes		violation.	
				Violation S	Subtotal \$100
				Violation	\$100
Econor	mic Benefit (EB)	for this violation		Statutory Limit T	est
	Esti-	nated EB Amount	\$219	Violation Einel Bonel	ty Total \$145
	ESTIF	nated ED AIIIUUIIL	\$219	Violation Final Penal	ty 10tai \$145
			This violation Final A	ssessed Penalty (adjusted for	r limits) \$145

	E	conomic	Benefit	Wor	ksheet		
Respondent	WOODLAKE-10	SSERAND WATER	SUPPLY CORPO	ORATIO	N (PCW No. 3)		
Case ID No.		7002.00.0	(0011 21 00141)	3101110	(
Reg. Ent. Reference No.							
	Public Water S	upply				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	10000	Date Required	i iliai Bate		Interest Sureu	costs sureu	25 Amount
Item Description							
.							
Delayed Costs		1		1 0 00	1 10	10	+ 0
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				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0 \$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0
Permit Costs				0.00	\$0 \$0	n/a	\$0
Other (as needed)				0.00	\$0 \$0	n/a	\$0 \$0
Other (as needed)	The delayed of	cost to propare an	d mail or direct			the customers of t	
	,			,			,
Notes for DELAYED costs	to the TC		,		,	cured in the Econom	ic Benefit
		Worksheet to	r violation No. 1	L on Per	nalty Calculation W	orksheet No. 2.	
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)	\$198	1-Jul-2019	21-Jul-2021	2.06	\$21	\$198	\$219
	The avoided	cost includes the	estimated amou	int to n	renare and mail or	directly deliver the	2018 CCR to
Notes for AVOIDED costs					•	is) + \$50) x one year	
Notes for Avoided costs	the customer	-	_		CCR to the date of		ar], calculated
		mom the	e due date of the	2010	CCR to the date of	screening.	
Approx. Cost of Compliance		\$198			TOTAL		\$219
Approxi cost or compilative		φ1 <i>9</i> 0			IOIAL		Ψ Ζ1 <i>9</i>



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

N. I.									
DATES	Assigned	13-Dec-2021							
	PCW	12-Jan-2022	Screening 22-Dec-2021	EPA Due					
RESPONDI	ENT/FACILI	TY INFORMAT	ON						
R	Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 4)								
Reg. Ei	nt. Ref. No.	RN101452621		•					

Facility/Site Region	10-Beaumont	Major/Minor Source	Minor	
CASE INFORMATION				
Enf./Case ID No.	52923	No. of Violations	13	
	2021-0979-PWS-E	Order Type	Findings	1
Media Program(s)	Public Water Supply	Government/Non-Profit	Yes	
Multi-Media		Enf. Coordinator	Miles Wehner	
		EC's Team	Enforcement Team 8	
Admin Donalty & I	imit Minimum ¢50 Maximum	¢ E በበበ		•

Aui	min. I Charty 4	Linne Pininiani	ψ30 [14α2	XIIII GIII	\$5,000			
			Penalty (Calcula	tion Section	n n		
TOTA	L BASE PENA	ALTY (Sum of	•				Subtotal 1	\$4,850
		•		•	,			. ,
ADJU		/-) TO SUBTO btained by multiplying		lty (Subtotal :	I) by the indicated r	percentage		
	Compliance Hi		the rotal base renai	45.0%	Adjustment		tals 2, 3, & 7	\$2,182
	Notes		or one agreed or e agreed order w		-	iability and		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Res	spondent does no	ot meet the	culpability crite	ria.		
	Good Faith Eff	ort to Comply T	otal Adjustmen	ts			Subtotal 5	-\$12
			-					·
	Economic Ben	efit		0.0%	Enhancement*		Subtotal 6	\$0
	Estimated	Total EB Amounts I Cost of Compliance	\$1,876 \$13,747	*Cappe	d at the Total EB \$ A	Amount		
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$7,020
07115	D EASTORS	AC ILICATOR M	AV DEGUIDE		2 221			
		AS JUSTICE M Il Subtotal by the indic			0.0%		Adjustment	\$0
reduces	Notes	Subtotal by the man	aced percentager					
						Final Per	nalty Amount	\$7,020
STAT	UTORY LIMIT	T ADJUSTMEN	IT			Final Asse	essed Penalty	\$7,020
DEFE					0.0%	Reduction	Adjustment	\$0
Reduces	Notes	enalty by the indicated	eferral is recomm	nended for	Findings Orders			
PAYA	BLE PENALT	Y						\$7,020

Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 4)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Case ID No. 52923

Reg. Ent. Reference No. RN101452621

Media Public Water Supply

Enf. Coordinator Miles Wehner

	Compliance History Worksheet		
Compliance Hist Component	ory <i>Site</i> Enhancement (Subtotal 2) Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<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 (number of audits for which violations were disclosed)	0	0%
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
Repeat Violator	Adjustment Pero	centage (Sub	ototal 2)
N/A	·	centage (Sub	total 3)
	ory Person Classification (Subtotal 7)	- '	,
N/A	Adjustment Per	centage (Sub	total 7)
Compliance Hist	ory Summary		
Compliance History Notes	Enhancement for one agreed order containing a denial of liability and one agreed denial of liability.	order without a	
Final Compliance	Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7)

Final Adjustment Percentage *capped at 100%

	Scre	ening Date	22-Dec-2021		Docke	t No. 2021-0979-PWS-E		PCW
	R	Respondent	WOODLAKE-JOS	SSERAND WA	TER SUPPLY COF	RPORATION (PCW No. 4)	Policy Rev	sion 5 (January 28, 2021)
	(Case ID No.	52923				PCW R	evision February 11, 2021
Rea.	Ent. Ref	erence No.	RN101452621					
			Public Water Su	ınnly				
	Fnf (Coordinator						
		ation Number						
	VIOI							
		Rule Cite(s)		30 Tex.	Admin. Code § 3	290.46(m)(1)(A)		
	Violatio	n Description				ge tank ("EST") annually. Sp s not inspected in 2020.	pecifically,	
						Bas	e Penalty	\$5,000
>> Env	/ironme	ntal, Propei	rty and Hum	an Health	Matrix			
				Harm				
OR		Release	Major	Moderate	Minor			
UK		Actual				Powcont F 00/		
		Potential		Х		Percent 5.0%		
>>Pro	aramma	tic Matrix						
////	gramma	Falsification	Major	Moderate	Minor			
						Percent 0.0%		
		Failure to in	spect the EST o	n an annual b	asis could cause	non-detection of defects ar	nd could	
	Matrix		•			unt of contaminants which w		
	Notes	' '			rotective of hum			
				<u> </u>				
						Adjustment	\$4,750	
								\$250
Violati	on Even	t a						
violatio	on Even	ts						
		Number of V	iolation Events	1		71 Number of violation	davs	
		Number of V	Tolation Events	Δ.		Number of violation	uuys	
			daily					
			weekly					
			monthly					
			quarterly			Violation Base	e Penalty	\$250
			semiannual					
			annual					
			single event	X				
				One single e	event is recomme	andad		
				One single e	event is recommit	ended.		
Good F	aith Effe	orts to Com	ply	0.0%			Reduction	\$0
				efore NOE/NOV	NOE/NOV to EDPRP	/Settlement Offer		
			Extraordinary					
			Ordinary					
			N/A	Х				
			,	T 5				
			Notes	The Respond		eet the good faith criteria		
					for this vi	JIALIUII.		
			<u> </u>					
						Violation	Subtotal	\$250
Econor	nic Pos	ofit (ED) for	this violation	nn -		Statuton, Lineit	Test	
LCOHOL	inc belle	EIIC (EB) IOF	this violation	711		Statutory Limit	1651	
		Estimate	ed EB Amount		\$44	Violation Final Pena	alty Total	\$363
				maria	Alam Final A	and Double /- 11 1 15	au Hwate N	+262
				i nis viola	ation Final Asse	essed Penalty (adjusted f	or iimits)	\$363

Economic Benefit Worksheet									
Respondent	WOODLAKE-JO	DSSERAND WATE	R SUPPLY CORPO	DRATIO	N (PCW No. 4)				
Case ID No.	52923								
Reg. Ent. Reference No.	RN101452621								
Media	Public Water S	Supply				Percent Interest	Years of		
Violation No.	1					Percent Interest	Depreciation		
						5.0	15		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount		
Item Description	zeem cost	Date Required	i mai bate		Interest Suveu	Costs Sarca	LD Amount		
Item Description									
Delayed Costs									
Equipment				0.00	\$0	\$0	\$0		
Buildings				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Engineering/Construction				0.00	\$0	\$0	\$0		
Land				0.00	\$0	n/a	\$0		
Record Keeping System				0.00	\$0	n/a	\$0		
Training/Sampling				0.00	\$0	n/a	\$0		
Remediation/Disposal				0.00	\$0 \$0	n/a	\$0 \$0		
Permit Costs Other (as needed)	\$41	12-Oct-2021	23-May-2023		\$0 \$3	n/a n/a	\$3		
other (as needed)	ΨΤΙ	12 000 2021	25 May 2025	1.01	<u> </u>	11/ a	\$5		
Notes for DELAYED costs						inspections (\$41 p			
Notes for BELATED Costs	tank), calculated from	the date of the	investi	gation to the estim	nated date of compli	ance.		
Avoided Costs	ANNII	ALTZE avoided o	ests before on	toring	itom (ovcont for	one-time avoided	L costs)		
Disposal	ANNO	T avoided C	osts before en	0.00	\$0	\$0	\$0		
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0 \$0		
Supplies/Equipment				0.00	\$0	\$0	\$0		
Financial Assurance				0.00	\$0	\$0	\$0		
ONE-TIME avoided costs	\$41	12-Oct-2021	22-Dec-2021	0.19	\$0	\$41	\$41		
Other (as needed)				0.00	\$0	\$0	\$0		
Notes for AVOIDED costs	The avoided	cost includes the	estimated amou	int to c	onduct annual EST	inspections (\$41 p	er tank x one		
Notes for Avoided costs		tank), calculated	d from the date	of the i	nvestigation to the	date of screening.			
Ŀ									
Approx. Cost of Compliance		\$82			TOTAL		\$44		
		732					т		

	Scree	ening Date	22-Dec-2021		Doc	cket No. 2021-0979-PWS-E			PCW
		_		SSERAND WA	TER SUPPLY C	ORPORATION (PCW No. 4)	Policy R	Revision 5 (Ja	anuary 28, 2021)
	C	ase ID No.	52923				PCV	V Revision Fe	ebruary 11, 2021
Rea.	Ent. Ref	erence No.	RN101452621						, ,
11091			Public Water Su	ınnly					
	Enf C	oordinator		арріу					
	_	tion Number	2	1					
	Viola	Rule Cite(s)							
				30 Te	ex. Admin. Co	de § 290.46(n)(2)			
						up-to-date map of the distributi			
	Violation	n Description			•	ated during emergencies. Speci			
		•	waterline lo	_		f V.B. Woods Road is looped when the show it was learned	nile the		
				aistributi	он шар ий пс	ot show it was looped.			
		l							
						Bas	e Penalty		\$5,000
							-		
>> En	vironmer	ntal, Propei	rty and Hum		Matrix				
		Dalaasa	Maiau	Harm	Minar				
OR		Release Actual	Major	Moderate	Minor				
		Potential				Percent 0.0%			
		rocericiai				0.0 70			
>>Pro	gramma	tic Matrix							
	J	Falsification	Major	Moderate	Minor				
					Х	Percent 1.0%			
								Ī	
	Matrix								
	Notes		Less tha	an 30% of the	rule requirem	nents were not met.			
	Notes								
								•	
						Adjustment	\$4,950		
									\$50
Violati	on Event	S							
		Number of V	iolation Events	1	L	71 Number of violation	days		
			daily						
			weekly						
			monthly						
			quarterly			Violation Bas	e Penalty		\$50
			semiannual				_		
			annual						
			single event	X					
	ſ								
				One single	event is recon	nmended			
				one single	270.10 13 1 60011				
								<u> </u>	
Good F	Faith Effo	rts to Com	ply	0.0%			Reduction		\$0
			E	Before NOE/NOV	NOE/NOV to EDI	PRP/Settlement Offer			
			Extraordinary						
			Ordinary						
			N/A	X					
				The Respond	ent does not r	meet the good faith criteria for			
			Notes	The Respond	this v	riolation.			
						Violation	Subtotal		\$50
						Violation	Subtotal		\$ 50
Econo	mic Bene	fit (EB) for	this violation	on		Statutory Limit	Test		
					± 4 4	-	_		±70
		EStimate	ed EB Amount		\$14	Violation Final Pen	aily i Otal		\$73
				This vio	lation Final A	Assessed Penalty (adjusted f	or limits)		\$73

	E	conomic	Benefit	Wor	ksheet				
Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 4)									
Case ID No.	52923								
Reg. Ent. Reference No.	RN101452621								
Media	Public Water S	Supply				Percent Interest	Years of		
Violation No.	2					Percent Interest	Depreciation		
						5.0	15		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount		
Item Description		•							
200 2 000 p. 101									
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 Other (as needed)	\$180	12-Oct-2021	23-May-2023	0.00 1.61	\$0 \$14	n/a n/a	\$0 \$14		
Notes for DELAYED costs	•	stem so that valv	es and mains ca	ın be ea		ccurate and up-to-d g emergencies, calcu npliance.	•		
Avoided Costs	ANNII	ALTZE avoided o	osts hefore en	terina	item (excent for	one-time avoided	L costs)		
Disposal	Aitito	The state of the s	Delore en	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		\$14		

	22-Dec-2021 Docket No. 2021-0979-PWS-E	PCW
Respondent	WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 4)	Policy Revision 5 (January 28, 2021)
Case ID No.	52923	PCW Revision February 11, 2021
Reg. Ent. Reference No.	RN101452621	
	Public Water Supply	
Enf. Coordinator		
Violation Number		
Rule Cite(s)		
	30 Tex. Admin. Code § 290.46(q)(1)	
	Failed to issue a boil water notification to the customers of the Facility us	ing the
	applicable language and prescribed format specified in 30 Tex. Admi	
Violation Description	Code § 290.47(c)(1). Specifically, the boil water notice posted on August 2	<mark>25, 2021 </mark>
	and the associated rescind notice did not follow the specified language and	<mark>d format</mark>
	and were not signed and dated.	
	Base	Penalty \$5,000
>> F	Annual House at the Maketer	
>> Environmental, Proper	ty and Human Health Matrix Harm	
Release		
OR Actual		
Potential	Percent 0.0%	
>>Programmatic Matrix		
Falsification	Major Moderate Minor	
	X Percent 1.0%	
Matrix		
Notes	Less than 30% of the rule requirements were not met.	
Notes		
	Adjustment	\$4,950
		\$50
Violation Events		
Violation Events		
Number of '	Violation Events 1 71 Number of violation of	days
		,
	daily	
	weekly	
	monthly	
	quarterly Violation Base	Penalty \$50
	semiannual annual	
	single event x	
	Single event	
	One single event is recommended.	
Good Faith Efforts to Com	<u> </u>	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x The Respondent does not meet the good faith criteria for	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x The Respondent does not meet the good faith criteria for	Reduction \$0
Good Faith Efforts to Com	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x The Respondent does not meet the good faith criteria for	
	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x The Respondent does not meet the good faith criteria for this violation. Violation	Subtotal \$50
Good Faith Efforts to Com Economic Benefit (EB) for	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x The Respondent does not meet the good faith criteria for this violation. Violation	Subtotal \$50
Economic Benefit (EB) for	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes The Respondent does not meet the good faith criteria for this violation. Violation Statutory Limit	Subtotal \$50 Test
Economic Benefit (EB) for	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes The Respondent does not meet the good faith criteria for this violation. Violation Statutory Limit	Subtotal \$50 Test Ilty Total \$73

	E	conomic	Benefit	Wor	'ksheet				
Respondent WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION (PCW No. 4)									
	D No. 52923								
Reg. Ent. Reference No.									
	Public Water S						Years of		
Violation No.		ларрту				Percent Interest	Depreciation		
Violation ito:	5					5.0	15		
	74 C4	Data Damainad	Einel Bete	V	T				
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount		
Item Description									
Delayed Costs				7					
Equipment				0.00	\$0	\$0	\$0		
Buildings				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Engineering/Construction				0.00	\$0	\$0	\$0		
Land				0.00	\$0	n/a	\$0		
Record Keeping System	#100	12.0-+ 2021	22 May 2022	0.00	\$0	n/a	\$0		
Training/Sampling	\$100	12-Oct-2021	23-May-2023	1.61	\$8	n/a	\$8		
Remediation/Disposal Permit Costs				0.00	\$0 \$0	n/a n/a	\$0 \$0		
Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0		
Other (as needed)	The delayed of	act includes the	actimated amou		7.7	ent a written protoc			
	-					-			
Notes for DELAYED costs						ing the applicable la			
	prescribed	•			- , , , , ,	calculated from the	date of the		
					ated date of compl				
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		\$100			TOTAL		\$8		

	Screening Date	22-Dec-2021		Doc	cket No. 2021-0979-PWS	6-E	PCW
	Respondent	WOODLAKE-JO	SSERAND WA	TER SUPPLY C	ORPORATION (PCW No. 4)	Policy F	Revision 5 (January 28, 2021)
	Case ID No.	52923				PCI	N Revision February 11, 2021
Rea.	Ent. Reference No.	RN101452621					, , ,
		Public Water Su	ınnly				
	Enf. Coordinator		арріў				
	Violation Number						
	Rule Cite(s)						1
	Rule Cite(3)		30 Tex. A	dmin. Code §	290.42(f)(1)(E)(ii)(IV)		
	Violation Description		ble. Specifical	ly, gas chlorin	ent facilities for chemicals to and polyphosphate are concord in the same room.		
						Base Penalty	\$5,000
F			!!!# -	Matuis			
>> En	vironmental, Prope	rty and Hum		Matrix			
	Release	Major	Harm Moderate	Minor			
OR	Actual		11000100				
	Potential		Х		Percent 5.	0%	
			,			<u> </u>	
>>Pro	grammatic Matrix						
	Falsification	Major	Moderate	Minor		<u></u>	
					Percent 0.	0%	
							1
					incompatible chemicals cou		
	Notes employees or				pollutants which would not	exceed levels	
	Notes	protectiv	e of human h	ealth or envir	onmental receptors.		
					Adjustment	\$4,750	
							\$250
							\$230
Violati	ion Events						
	Number of \	/iolation Events	1		71 Number of viola	tion days	
		daily					
		weekly					
		monthly					1050
		quarterly			Violation	Base Penalty	\$250
		semiannual annual					
		single event	X				
		Jgio evene	Λ	I			
			One single	event is recom	nmended.		
Good	Faith Efforts to Com		0.0%			Reduction	\$0
		The state of the s	efore NOE/NOV	NOE/NOV to EDI	PRP/Settlement Offer		
		Extraordinary					
		Ordinary					
		N/A	Х				
		Notes	The Respond		neet the good faith criteria	for	
		l			Viola	tion Subtotal	\$250
Fcono	mic Benefit (EB) for	this violation	nn -		Statutory Li	<u>'</u>	\$230
	e Delicit (ED) idi	tilis violation	J11		Statutory Li	rest	
	Estimate	ed EB Amount		\$62	Violation Final	Penalty Total	\$363
			This via	lation Final A	Assessed Penalty (adjust	ed for limite)	\$363
			iiiis vio	iativii Fiilal <i>P</i>	ssesseu renaity (aujust	eu ioi illilits)	\$303

	E	conomic	Benefit	Wor	ksheet					
Respondent	woodlake-josserand water supply corporation (PCW No. 4)									
Case ID No.		52923								
Reg. Ent. Reference No.	RN101452621									
	Public Water S						Years of			
Violation No.		,				Percent Interest	Depreciation			
						5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item Description										
Testi Deseription										
Delayed Costs										
Equipment				0.00	\$0	\$0	\$0			
Buildings				0.00	\$0	\$0	\$0			
Other (as needed)	\$500	12-Oct-2021	22-Jul-2023	1.78	\$3	\$59	\$62			
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 \$0	n/a	\$0 \$0			
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0			
other (as needed)	The de		- +1+:+							
Notes for DELAYED as to		•				ate containment faci				
Notes for DELAYED costs	polypnospn	ate and chiorine g	jas, caiculated i			tigation to the estim	ated date of			
				complia	ance.					
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	costs)			
Disposal				0.00	\$0	\$0	\$0			
Personnel				0.00	\$0	\$0	\$0			
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0			
Supplies/Equipment				0.00	\$0	\$0	\$0			
Financial Assurance				0.00	\$0	\$0	\$0			
ONE-TIME avoided costs				0.00	\$0	\$0	\$0			
Other (as needed)				0.00	\$0	\$0	\$0			
Notes for AVOIDED costs										
Approx. Cost of Compliance		\$500			TOTAL		\$62			
		Ψ300			IOIAL		402			

	Screening Da	te 22-Dec-2021		Docket No.	2021-0979-PWS-E		PCW
			SSERAND WA	TER SUPPLY CORPORATI	ON (PCW No. 4)	Policy R	evision 5 (January 28, 2021)
	Case ID I	lo. 52923				PCV	V Revision February 11, 2021
Rea.	Ent. Reference I	lo. RN101452621					, ,
1109.		lia Public Water Su	ınnly				
	Enf. Coordina		арріў				
	Violation Num		1				
	Rule Cite						
	itale cité		30 T	Tex. Admin. Code § 290.	46(m)		
		Failed to ini	tiate maintena	ance and housekeeping p	practices to ensure tl	he good	
	Violeties Descript	working condit		al appearance of the sys		_	
	Violation Descript	Specifically, the	e seam of the	roof and siding of the gr	round storage tank a	t Plant No.	
				1 was rusted.			
					Do	Danaliu	фГ 000
					вая	e Penalty	\$5,000
>> Fn	vironmental, Pro	nerty and Hum	an Health	Matrix			
LII	- I ominicinally File	porcy and mail	Harm	IMEIA		l	
	Rele	ise Major	Moderate	Minor			
OR	Ac	ual					
	Potei	tial	Х		Percent 5.0%		
						-	
>>Pro	grammatic Matr						
	Falsificat	on Major	Moderate	Minor	_		
					Percent 0.0%		
	IVISTRIV			ndition and general appe		-	
	Notes expose	-	•	a significant amount of co		ould not	
		е	xceed levels p	protective of human heal	un.		
				A cit	justment	¢4 750	
				Au	justillelit	\$4,750	
							\$250
Violati	ion Events						
		6.7.1			1 N 1 6 1 1 1		
	Number	of Violation Events	1	71	Number of violation	days	
		daily		1			
		daily weekly					
		monthly					
		quarterly	Х		Violation Bas	se Penalty	\$250
		semiannual				, c : c,	Ψ233
		annual					
		single event					
				_			
	One quar	erly event is recom	mended, calcu	ulated from the October	12, 2021 investigati	on date to	
	3.13 40.01	-	· ·	date December 22, 202	· · · · · · · · · · · · · · · · · · ·		
				,			
Good	Faith Efforts to C	amply	0.0%			Reduction	\$0
good I	aith Liferts to C			NOE/NOV to EDPRP/Settleme	ent Offer	Reduction	\$ U
		Extraordinary	CIOLO NOL/NOV	to EDI NI / SettleMe	1		
		•			1		
		Ordinary	V		1		
		N/A	X			1	
		Notes	The Responde	ent does not meet the g	ood faith criteria for		
		Notes		this violation.			
						J	
					Violation	n Subtotal	\$250
							7
_							
Econo	mic Benefit (EB)	for this violation	on		Statutory Limi	t Test	
Econo		for this violation	on	\$226	Statutory Limi Violation Final Pen		\$363
Econo				\$226 lation Final Assessed I	Violation Final Pen	alty Total	

	E	conomic	Benefit	Wor	ksheet		
Respondent	WOODLAKE-JO	SSERAND WATER	R SUPPLY CORPO	DRATIO	N (PCW No. 4)		
Case ID No.					,		
Reg. Ent. Reference No.	RN101452621						
	Public Water S	vlaqui					Years of
Violation No.						Percent Interest	Depreciation
21312333111331	_					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
reem Description							
Delayed Costs							
Équipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$2,000	12-Oct-2021	23-May-2023	1.61	\$11	\$215	\$226
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
	The delayed	cost includes the	estimated amou	int to re	enair the seam of t	the roof and siding	of the ground
Notes for DELAYED costs	,				•	ation to the estimat	
Notes for DELATED costs	storage t	alik at Flailt No. 1	•	complia	_	ation to the estimat	ed date of
				Compile	ance.		
Avoided Costs	ANNU	ALIZE avoided c	osts before en			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							
L							
,							
Approx. Cost of Compliance		\$2,000			TOTAL		\$226

	Date 22-Dec-2021	Docket No. 2021-0979-PWS-E	PCW
Respon	dent WOODLAKE-JOSSE	RAND WATER SUPPLY CORPORATION (PCW No. 4)	Policy Revision 5 (January 28, 2021)
Case ID	No. 52923		PCW Revision February 11, 2021
Reg. Ent. Reference	No. RN101452621		
M	edia Public Water Supply	/	
Enf. Coordin	ator Miles Wehner		
Violation Nu			
Rule C	te(s) 30 Tex. Admin.	Code § 290.45(b)(1)(C)(i) and Tex. Health & Safety (Code §
		341.0315(c)	
	Failed to provide a	well capacity of 0.6 gallons per minute ("gpm") per co	onnection
Violetian Bassai	Specifically the F	facility had 196 connections in Pressure Plane No. 2 rec	
Violation Descri	well capacity of 11	7.6 gpm. However, only 96 gpm of well capacity was	provided,
		indicating a 18% deficiency.	
		Bas	e Penalty \$5,000
			-
>> Environmental, P			
Re		Harm oderate Minor	
	Actual	- I III I I I I I I I I I I I I I I I I	
Po	ential	X Percent 5.0%	
>>Programmatic Ma			
Falsific	ation Major M	oderate Minor Percent 0.0%	
		Percent 0.0%	
	•	ell capacity could expose persons served by the Facilit	
Notes signi	icant amount of contamin	ants that would not exceed levels protective of human	nealth.
		Adjustment	\$4,750
			\$250
Violation Events			
Numb	er of Violation Events	1 71 Number of violation	davs
			,
	daily		
	weekly		
	monthly quarterly	X Violation Bas	e Penalty \$250
	semiannual	Violation bas	e reliaity \$250
	annual		
	single event		
One qu		ded, calculated from the October 12, 2021 investigation	on date to
	the s	screening date December 22, 2021.	
Good Faith Efforts to			Reduction \$0
	Extraordinary Extra	NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
	Ordinary		
	N/A	X	
		<u> </u>	
	Notes The	Respondent does not meet the good faith criteria for this violation.	
		tilis violation.	
		Violetian	Subtotal \$250
		violation	\$230
Economic Benefit (EB) for this violation	Statutory Limit	: Test
_			- It Tatal
Es	imated EB Amount	\$708 Violation Final Pen	alty Total \$363
Es	imated EB Amount	\$708 Violation Final Penalty (adjusted f	-

	E	conomic	Benefit	Wor	ksheet		
Respondent	WOODLAKE-JO	DSSERAND WATER	R SUPPLY CORPO	DRATIO	N (PCW No. 4)		
Case ID No.	52923						
Reg. Ent. Reference No.	RN101452621						
	Public Water S						Years of
Violation No.						Percent Interest	Depreciation
7.0.000						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs							
Équipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$5,000	12-Oct-2021	20-Oct-2023	2.02	\$34	\$674	\$708
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	connec	tion, calculated fro	om the date of t	he inve	stigation to the es	pacity of at least 0. timated date of com	ppliance.
Avoided Costs	ANNU	ALIZE avoided c	<u>osts before en</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		\$5,000			TOTAL		\$708
Approx. Cost of Compilative		\$3,000			IOIAL		\$700

	Screening Date	22-Dec-2021		Docket	No. 2021-0979-PWS-E		PCW
	Respondent	WOODLAKE-JOS	SERAND WA	TER SUPPLY CORP	ORATION (PCW No. 4)	Policy R	Revision 5 (January 28, 2021)
	Case ID No.					PCV	V Revision February 11, 2021
Rea.	Ent. Reference No.	RN101452621					, , ,
		Public Water Su	nnly				
	Enf. Coordinator		PPIY				
	Violation Number						
	Rule Cite(s)						
	Rule Cite(3)	3	30 Tex. Admi	n. Code § 290.46(f)(2) and (f)(3)(D)(ii)		
		Failed to mainta	ain water wor	ks operation and r	maintenance records and m	nake them	
	Violation Description	readily availab	ole for review	by the Executive	Director upon request. Spe	cifically,	
	Violation Description	records for the	results of sto	orage tank inspect	ions were not maintained o	n-site for	
				review.			
					D	- Dll	фГ 000
					Bas	e Penalty	\$5,000
>> En	vironmental, Prope	rty and Huma	an Health	Matrix			
		icy and main	Harm	TIGCTIX			
	Release	Major	Moderate	Minor			
OR	Actual						
	Potential				Percent 0.0%		
_							
>>Pro	grammatic Matrix						
	Falsification	Major	Moderate	Minor	Para ant		
				X	Percent 1.0%		
	Matrix	l ogg than	n 200/ of the	wile we arrive ment	aua mat maat		
	Notes	Less than	n 30% or the	rule requirements	were not met.		
					Adjustment	\$4,950	
					Adjustinent	ψ1,230	
							\$50
	_						
Violati	ion Events						
	ion Events						
		/iolotion Events	1		Number of violation	daye	
		/iolation Events	1		Number of violation	days	
			1		Number of violation	days	
		daily	1		1 Number of violation	days	
		daily weekly	1		Number of violation	days	
		daily	1		Number of violation Violation Bas		\$50
		daily weekly monthly	1				\$50
		daily weekly monthly quarterly	1				\$50
		daily weekly monthly quarterly semiannual	1 X				\$50
		daily weekly monthly quarterly semiannual annual	1 x				\$50
		daily weekly monthly quarterly semiannual annual	1 X		Violation Bas		\$50
		daily weekly monthly quarterly semiannual annual	1 X One single of	event is recommer	Violation Bas		\$50
		daily weekly monthly quarterly semiannual annual	1 X One single of	event is recommer	Violation Bas		\$50
	Number of \	daily weekly monthly quarterly semiannual annual single event		event is recommer	Violation Bas	e Penalty	·
		daily weekly monthly quarterly semiannual annual single event	25.0%	event is recommer	Violation Bas		\$50 \$12
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0%		Violation Bas	e Penalty	·
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV		Violation Bas	e Penalty	·
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0%		Violation Bas	e Penalty	·
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X	NOE/NOV to EDPRP/S	Violation Bas	e Penalty	·
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X	NOE/NOV to EDPRP/S	Violation Bas nded. ettlement Offer npliance on October 12,	e Penalty	·
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X	NOE/NOV to EDPRP/S	Violation Bas nded. ettlement Offer npliance on October 12,	e Penalty	·
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X	NOE/NOV to EDPRP/S	Violation Bas nded. ettlement Offer npliance on October 12,	e Penalty	·
	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X	NOE/NOV to EDPRP/S	Violation Bas	e Penalty	·
Good 1	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X The Respor	NOE/NOV to EDPRP/S	Violation Bas	e Penalty Reduction Subtotal	\$12
Good 1	Number of \	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X The Respor	NOE/NOV to EDPRP/S	Violation Bas	e Penalty Reduction Subtotal	\$12
Good 1	Number of \ Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV X The Respor	NOE/NOV to EDPRP/S	Violation Bas	e Penalty Reduction Subtotal	\$12
Good 1	Number of \ Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event	25.0% efore NOE/NOV x The Respon	NOE/NOV to EDPRP/S Indent achieved cor 2021.	violation Base moded. ettlement Offer mpliance on October 12, Violation Statutory Limit	e Penalty Reduction Subtotal Test alty Total	\$12

	E	conomic	Benefit	wor	ksheet		
Respondent	WOODLAKE-JO	DSSERAND WATER	R SUPPLY CORP	ORATIO	N (PCW No. 4)		
Case ID No.					,		
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		опры				Percent Interest	Depreciation
Violation No.	/						
						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	12-Oct-2021	12-Oct-2021	0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	The delayed	cost includes the	e estimated amo	unt to r	maintain water sys	stem operation and	maintenance
Notes for DELAYED costs						uest by the Executi	
	1000100 011		•		stigation to the dat		ve Birectory
						·	
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							
Notes for Avoided costs							
,			<u> </u>				
Approx. Cost of Compliance		\$45			TOTAL		\$0
		ΨΤΟ			IOIAL		Ψ0

	Screening Date	22-Dec-2021	Docket No. 2021-0979-PWS-E	PCW
			ATER SUPPLY CORPORATION (PCW No. 4)	Policy Revision 5 (January 28, 2021)
	Case ID No.		,	PCW Revision February 11, 2021
Rea	Ent. Reference No.			Tell Nevision February 11/2021
iteg.				
		Public Water Supply		
	Enf. Coordinator			
	Violation Number			
	Rule Cite(s)	30	Tex. Admin. Code § 290.42(I)	
		Failed to maintain a thereue	gh and up-to-date plant operations manual for o	porator
	Violation Description	raned to maintain a thoroug	review and reference.	perator
			review and reference.	
			Base F	Penalty \$5,000
			2450	ψ5/555
>> En	vironmental, Prope	rty and Human Health	Matrix	
	, a cop o	Harm		
	Release	Major Moderate	Minor	
OR	Actual			
	Potential		Percent 0.0%	
>>Pro	grammatic Matrix			
	Falsification	Major Moderate	Minor	
			X Percent 1.0%	
	Matrix	Less than 30% of the	e rule requirements were not met.	
	Notes		'	
			Adjustment	\$4,950
			-	
				\$50
	_			
Violati	ion Events			
	Number of \	/iolation Events 1	71 Number of violation da	iys
			a	
		daily		
		weekly		
		monthly		
		quarterly	Violation Base F	Penalty \$50
		semiannual		
		annual		
		single event x		
		On a single	avent is assume and a	
		One single	event is recommended.	
Good	Faith Efforts to Com	ply 0.0%	Do.	duction \$0
3000	aith Endits to Coll		NOE/NOV to EDPRP/Settlement Offer	\$0
		Extraordinary Extraordinary	NOL/NOV to EDITIF/Settlement Offer	
		Ordinary		
		N/A x		
		The Respons	lent does not meet the good faith criteria for	
		Notes The Respond	this violation.	
			Cilio Violationi	
			Violation S	ubtotal \$50
Econo	mic Ronofit (ED) for	thic violation	Chahubawa Liwit T	ost
ECONO	mic Benefit (EB) for	uiis violation	Statutory Limit T	ESL
	Estimate	ed EB Amount	\$4 Violation Final Penalt	y Total \$73
	=5:Idt			
		This vio	olation Final Assessed Penalty (adjusted for	limits) \$73

	E	conomic	Benefit	Wor	ksheet		
		DSSERAND WATER	SUPPLY CORPO	ORATIO	N (PCW No. 4)		
Case ID No.	52923						
Reg. Ent. Reference No.	RN101452621						
	Public Water S					D	Years of
Violation No.		, ,				Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
,							
Delayed Costs				_			
Équipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$45	12-Oct-2021	22-Jun-2023	1.69	\$4	n/a	\$4
Notes for DELAYED costs						n and up-to-date pla mated date of comp	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$45			TOTAL		\$4

	Screening Date	22-Dec-2021	Docket No. 2021-0979-PWS-E	PCW
			RAND WATER SUPPLY CORPORATION (PCW No. 4) Policy	Revision 5 (January 28, 2021)
	Case ID No.			CW Revision February 11, 2021
Rea	Ent. Reference No.		·	on none ozraar, 11, 2011
iteg.		Public Water Supply		
	Enf. Coordinator	11 /		
	Violation Number			
	Rule Cite(s)			¬
	Rule Cite(s)		30 Tex. Admin. Code § 290.119(b)(7)	
	Violation Description	the Facility was o	eptable analytical method for disinfectant analyses. Specifically operating the LaMotte 1200 series colorimeter with Hach N,N-mediamine ("DPD") pillow packets when it was required to run	·
			LaMotte DPD reagents.	
			Base Penalt	y \$5,000
>> En	vironmental, Prope			
			larm M.	
OR	Release Actua		oderate Minor	
OK	Potentia		X Percent 3.0%	
	Potentia		X Percent 3.0%	
>>Pro	grammatic Matrix			
,,,,,	Falsification	Major Mo	oderate Minor	
		1.0301	Percent 0.0%	
				_
	Failure to or	erate the colorimeter	r with the proper reagents could expose persons served by the	
	Matrix Facility to a		nt of contaminants which would not exceed levels protective of	
	Notes	J	human health.	
			Adjustment \$4,85	0
				1450
				\$150
Violati	ion Events			
Violati	IOII EVEIILS			
	Number of	Violation Events	1 71 Number of violation days	
		daily		
		weekly		
		monthly		
		quarterly	Violation Base Penalt	y \$150
		semiannual		
		annual		
		single event	X	
				-
		On	ne single event is recommended.	
		Oli	io single event is recommended.	
				_
Good I	Faith Efforts to Con	ply	0.0% Reduction	\$0
			NOE/NOV NOE/NOV to EDPRP/Settlement Offer	· ·
		Extraordinary		
		Ordinary		
		N/A	X	
			Respondent does not meet the good faith criteria for	
		Notes The		
		Notes	this violation.	
		Notes	this violation.	_
		Notes		I \$150
Econo	mic Benefit (EB) fo	Notes	this violation.	sl \$150
Econo		Notes	this violation. Violation Subtota	
Econo		r this violation	this violation. Violation Subtota Statutory Limit Test	\$218

	E	conomic	Benefit	Wor	'ksheet		
Respondent	WOODLAKE-JO	SSERAND WATE	R SUPPLY CORP	ORATIO	N (PCW No. 4)		
Case ID No.					()		
Reg. Ent. Reference No.							
							Years of
	Public Water S	ирріу				Percent Interest	
Violation No.	9						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
2001112 00011 1901011							
Delayed Costs							
Équipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	+100	12.0 2021	22.14	0.00	\$0	n/a	\$0
Training/Sampling	\$100	12-Oct-2021	23-May-2023	1.61	\$8	n/a	\$8
Remediation/Disposal Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)				0.00	Φ0	II/ a	\$ 0
	The delayed of	cost includes the	estimated amou	nt to up	date the Facility's	operational guidance	ce and conduct
Notes for DELAYED costs	employee t	raining to ensure	that LaMotte D	PD reag	ents are used to o	perate the LaMotte	1200 series
	colorime	eter, calculated fr	om the date of	the inve	stigation to the es	timated date of con	npliance.
4							•
Avoided Costs	ANNU	ALIZE avoided c	osts before en		<u> </u>	one-time avoided	
Disposal				0.00	\$0 #0	\$0 #0	\$0 #0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
,		<u>, </u>					
Notes for AVOIDED costs							
		1					, _1
Approx. Cost of Compliance		\$100			TOTAL		\$8

	Screening Date		Docket No. 2021-0979-PWS-E	PCW
	_		ATER SUPPLY CORPORATION (PCW No. 4)	Policy Revision 5 (January 28, 2021)
	Case ID No.			PCW Revision February 11, 2021
Reg.	Ent. Reference No.	RN101452621		
		Public Water Supply		
	Enf. Coordinator			
	Violation Number			
	Rule Cite(s)	30 -	Tex. Admin. Code § 290.46(m)	
			ance and housekeeping practices to ensure the g	
	Violation Description		ral appearance of the system's facilities and equi for Well No. 1 was rusted, the generator at Plant	- Control of the Cont
	violation bescription	•	g, and the sample tap connected to the feet-of-v	
			gauge was heavily corroded.	
			Base F	Penalty \$5,000
_				
>> En	vironmental, Prope	rty and Human Health	n Matrix	
	Release	Harm Major Moderate	Minor	
OR	Actual	3		
	Potential		X Percent 3.0%	
_				
>>Pro	grammatic Matrix			
	Falsification	Major Moderate	Minor Percent 0.0%	
			Percent 0.0%	
	Failure to	maintain the good working co	ondition and general appearance of the Facility co	ould
	Matrix expose pers		nsignificant amounts of contaminants which wou	
	Notes		protective of human health.	
		<u> </u>		
			Adjustment	\$4,850
				\$150
				\$150
Violati	on Events			
	Number of \	/iolation Events 4	71 Number of violation da	ys
		daily	1	
		weekly		
		monthly		
		quarterly	Violation Base F	Penalty \$600
		semiannual		
		annual		
		single event x		
	F	our single events are recomr	mended (one for each piece of equipment).	
Cood	Faith Efforts to Com	unlu 0.00/	1	1
G000 F	Faith Efforts to Com	Before NOE/NOV		duction \$0
		Extraordinary	Notified to Epith Joctionient Offer	
		Ordinary		
		N/A x		
		Notes The Respond	lent does not meet the good faith criteria for this violation.	
			this violation.	
			Walntie - C	uhtotal
			Violation Su	ubtotal \$600
Econo	mic Benefit (EB) for	this violation	Statutory Limit T	est
	Estimate	ed EB Amount	\$57 Violation Final Penalt	y Total \$870
		This vio	lation Final Assessed Penalty (adjusted for	limits) \$870

	E	conomic	Benefit	Woi	rksheet		
Respondent	WOODLAKE-JO	OSSERAND WATE	R SUPPLY CORP	ORATIC	N (PCW No. 4)		
Case ID No.		· · · · · · · · · · · · · · · · · · ·					
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		ларрту				Percent Interest	Depreciation
Violation No.						5.0	15
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Item Description	Item cost	Date Required	i iliai bate	113	Interest Saveu	costs savea	LD Amount
Item Description							
Dolayed Costs							
Delayed Costs Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)	\$500	12-Oct-2021	23-May-2023	1.61	\$3	\$54	\$57
Engineering/Construction	<u> </u>	12 000 2021	25 Hay 2025	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
	•					g for Well No. 1, the	_
Notes for DELAYED costs	Plant Nos. 1	•	•		•	gauge, calculated fro	om the date of
		the in	nvestigation to	the estir	mated date of com	pliance.	
Avoided Costs	ANNII	ALTZE avoided co	osts hefore en	terina	item (except for	one-time avoided	t costs)
Disposal	Anno	Terre di	osts before en	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		\$500			TOTAL		\$57
		·					· .

	Screening Date		Docket No. 2021-0979-PWS-E	PCW
	Respondent	WOODLAKE-JOSSERAND WA	TER SUPPLY CORPORATION (PCW No. 4)	Policy Revision 5 (January 28, 2021)
	Case ID No.	52923		PCW Revision February 11, 2021
Reg.	Ent. Reference No.	RN101452621		
	Media	Public Water Supply		
	Enf. Coordinator	Miles Wehner		
	Violation Number			
	Rule Cite(s)		21(a) and TCEQ Agreed Order Docket No. 20	<mark>18-1552-</mark>
		PWS-	-E, Ordering Provision No. 2.a.i	
		Failed to maintain an un-to-	date chemical and microbiological monitoring	lan that
		is subject to the review and a	approval of the Executive Director, and a copy	
	Violation Description	∖ <mark> </mark>	treatment plant and at a central location. Spe	
			e monitoring plan was not maintained at the p	
			_	
			Base	Penalty \$5,000
>> Env	vironmental. Prope	erty and Human Health	Matrix	
		Harm	. 144 174	
	Release		Minor	
OR	Actua			
	Potentia		Percent 0.0%	
> > D##	avammatic Matrix			
>>Pro	grammatic Matrix Falsification	Major Moderate	Minor	
	raisilication	Major Moderate	Percent 10.0%	
			1 Crecite 10.0 70	
	Matrix	Greater than 70% of th	e rule requirements were not met.	
	Notes		- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	
			Adjustment	\$4,500
				¢500
				\$500
Violati	on Events			
	Number of	Violation Events 1	820 Number of violation of	lays
		daily		
		weekly		
		monthly quarterly	Violation Base	Penalty \$500
		semiannual	Violation base	p 500
		annual		
		single event x		
		One single e	event is recommended.	
Good F	aith Efforts to Con	1ply 0.0%	R	eduction \$0
			NOE/NOV to EDPRP/Settlement Offer	10
		Extraordinary		
		Ordinary		
		N/A ×		
		Notes The Responde	ent does not meet the good faith criteria for	
			this violation.	
				On the second
			Violation	Subtotal \$500
			Ot-11	Tost
Econor	nic Benefit (EB) fo	r this violation	Statutory Limit	1651
Econor				
Econor		r this violation ed EB Amount	\$33 Violation Final Pena	

	E	conomic	Benefit	Wor	ksheet		
Respondent	WOODLAKE-JO	DSSERAND WATE	R SUPPLY CORP	ORATIO	N (PCW No. 4)		
Case ID No.	52923						
Reg. Ent. Reference No.	RN101452621						
Media Violation No.	Public Water S	Supply				Percent Interest	Years of Depreciation
Violation No.	11					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	Item Cost	Date Required	i illai Date	113	Interest Saveu	Costs Saveu	LD Alliount
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	\$175	24-Sep-2019	22-Jul-2023	0.00 3.83	\$0 \$33	n/a n/a	\$0 #33
Other (as needed)	\$1/5	24-3ep-2019	22-Jui-2023	3.63	\$33	II/d	\$33
Notes for DELAYED costs	The delayed cost includes the estimated amount to maintain a copy of the chemical and microbiological monitoring plan at each plant, calculated from the effective date of TCEQ Agreed Order Docket No. 2018-						
Notes for BELATED Costs	monitoring pi	· · · · · · · · · · · · · · · · · · ·			ated date of compl		Ret No. 2010
A	A NINIII				<u> </u>		d costs)
Avoided Costs	ANNUA	ALIZE avoided Co	osts before en	0.00	\$0	one-time avoided	
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$175			TOTAL		\$33
• ,							1

	Screening Date			ocket No. 2021-0979-PWS	-E	PCW
			D WATER SUPPLY	CORPORATION (PCW No. 4)	Policy Revision 5 (Janua	ary 28, 2021)
	Case ID No.				PCW Revision Febru	ary 11, 2021
Reg.	Ent. Reference No.					
		Public Water Supply				
	Enf. Coordinator					
	Violation Number		200 41/-\/1\/f\	and TCFO Assessed Ouder Dead	rat Na. 2010	
	Rule Cite(s)	_		and TCEQ Agreed Order Dockering Provision No. 2.c	et No. 2018-	
	Violation Description	Failed to obtain a sanita	ary control easem ecifically, at Well	nent that covers the land with No. 1, Highway 287 was note 0-foot radius.		
					Base Penalty	\$5,000
	duament I B		-146-84			
>> En	vironmental, Prope	rty and Human He _{Harr}				
	Release	Major Modera				
OR	Actual					
	Potential		Х	Percent 3.	0%	
D						
>>Pro	grammatic Matrix Falsification	Major Modera	ate Minor			
	1 disilication	Major Modera	ate Millor	Percent 0.	0%	
				<u> </u>	5 70	
				pose persons served by the F exceed levels protective of h		
				Adjustment	\$4,850	
						\$150
Violati	on Events					
	Number of \	/iolation Events 1		820 Number of viola	cion days	
		daily weekly monthly quarterly semiannual annual single event x		Violation	Base Penalty	\$150
		One si	ngle event is reco	ommended.		
Good F	aith Efforts to Com	ply 0	.0%		Reduction	\$0
		Before NOE,	/NOV NOE/NOV to E	EDPRP/Settlement Offer		
		Extraordinary				
		Ordinary				
		N/A x				
		Notes The Res		t meet the good faith criteria violation.	for	
		1		Viola	tion Subtotal	\$150
Econor	mic Benefit (EB) for	this violation		Statutory Li	mit Test	
				_		10:5
	Estimate	ed EB Amount	\$4	Violation Final I	renaity lotal	\$218
		This	violation Final	Assessed Penalty (adjust	ed for limits)	\$218

	E	conomic	Benefit	Woı	rksheet		
Respondent	WOODLAKE-JO	OSSERAND WATER	R SUPPLY CORF	ORATIC	N (PCW No. 4)		
Case ID No.	52923						
Reg. Ent. Reference No.	RN101452621						
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	12					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
20011 2 2001 1 2 1 1 1 1							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	100	34.3	00 1 1 0000	0.00	\$0	n/a	\$0
Other (as needed)	\$20	24-Sep-2019		3.83	\$4	n/a	\$4
	,					a sanitary control e	
Notes for DELAYED costs	,			•	•	the requirement, o	
	the effec	ctive date of TCEQ	Agreed Order			/S-E to the estimate	ed date of
				compli			
Avoided Costs	ANNU	ALIZE avoided co	osts before er			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$20			TOTAL		\$4

	Screening Date		Docket No. 2021-0979-PWS-E	PCW
	Responden	WOODLAKE-JOSSERAND WA	ATER SUPPLY CORPORATION (PCW No. 4)	Policy Revision 5 (January 28, 2021)
	Case ID No	52923		PCW Revision February 11, 2021
Reg.	Ent. Reference No	RN101452621		
	Media	Public Water Supply		
	Enf. Coordinato	Miles Wehner		
	Violation Numbe			
	Rule Cite(s	30 Tex. Admin. Code 2	90.45(b)(1)(C)(iv) and Tex. Health & Safety Cod	le §
			341.0315(c)	
		Failed to provide an elev	vated storage capacity of 100 gallons per connec	tion.
	Violetian Decements	Specifically Pressure Plane	No. 2 had 196 connections requiring 19,600 ga	
	Violation Description	elevated storage capacity. H	lowever, only 5,727 gallons of elevated storage	<mark>capacity</mark>
		were pr	ovided, indicating a 71% deficiency.	
			Base I	Penalty \$5,000
>> Env	vironmentai, Prop	erty and Human Healtl Harm	n Matrix	
	Releas		Minor	
OR	Actua			
	Potentia	X X	Percent 15.0%	
> > D###	ausmanstie Matrix			
>>Pro	grammatic Matrix Falsification	Major Moderate	Minor	
	1 disilication	Major Moderate	Percent 0.0%	
			3 01 00110 010 70	
	Matrix Failure to pr		-k	
	·		storage or pressure tank capacity could expose p which would exceed levels protective of human he	
	Notes Served by	the racinty to contaminants w	which would exceed levels protective of human he	saith.
			A division sub	#4.250
			Adjustment	\$4,250
				\$750
Violati	on Events			
Violatio	on Events			
	Number of	Violation Events 3	71 Number of violation da	nys
		daily	_	
		weekly		
		monthly x quarterly	Violation Base I	Penalty \$2,250
		semiannual	Violation base i	\$2,230
		annual]	
		single event		
	Three month		calculated from the October 12, 2021 investigati	<mark>on date</mark>
		to the screenir	ng date December 22, 2021.	
Good F	aith Efforts to Co			eduction \$0
		Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
		·		
		Ordinary N/A x		
			,	
		Notes The Respond	dent does not meet the good faith criteria for	
			this violation.	
		·	Violation S	ubtotal \$2,250
Econor	nic Benefit (EB) fo	r this violation	Statutory Limit 1	Test Test
	Estima	ted EB Amount	\$708 Violation Final Penalt	y Total \$3,263
		- L!!	lation Final Assessed Penalty (adjusted for	limits) \$3,263

	E	conomic	Benefit	Woı	rksheet		
Respondent	WOODLAKE-J	OSSERAND WATE	R SUPPLY CORF	PORATIC	N (PCW No. 4)		
Case ID No.	52923						
Reg. Ent. Reference No.	RN101452621						
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	13					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
20000 2 00 00 4 00 00							
Delayed Costs							
Equipment	\$5,000	12-Oct-2021	20-Oct-2023	2.02	\$34	\$674	\$708
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)		<u> </u>		0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs The delayed cost includes the estimated amount to provide an elevated storage capacity of 100 gallons per connection, calculated from the date of the investigation to the estimated date of compliance.							
Avoided Costs	ANNU	ALIZE avoided c	osts before er			one-time avoide	
Disposal		<u> </u>		0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				1 0.00	Ι ΨΟ	, φο	Ψ0
Approx. Cost of Compliance		\$5,000			TOTAL		\$708

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



Compliance History Report

Compliance History Report for CN600665970, RN101452621, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, CN600665970, Woodlake Josserand WSC Classification: NOT APPLICABLE Rating: N/A

or Owner/Operator:

Regulated Entity: RN101452621, WOODLAKE JOSSERAND Classification: NOT APPLICABLE Rating: N/A

WSC

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

CH Group: 14 - Other

Location: 3908 EAST UNITED STATES HIGHWAY 287 NEAR GROVETON, TRINITY COUNTY, TEXAS

TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

2280010

Compliance History Period: September 01, 2016 to August 31, 2021 Rating Year: 2021 Rating Date:

09/01/202

Date Compliance History Report Prepared: August 30, 2022

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: August 30, 2017 to August 30, 2022

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

Name: Miles Wehner Phone: (512) 239-2813

Site and Owner/Operator History:

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

NO.

2) Has there been a (known) change in ownership/operator of the site during the compliance period?

NO

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

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

1 Effective Date: 09/24/2019 ADMINORDER 2018-1552-PWS-E (1660 Order-Agreed Order With Denial)

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(1)(F)

Description: Failed to obtain a sanitary control easement that covers the land within 150 feet of Well No. 1. Specifically,

Highway 287 was noted within the existing 150-foot radius.

Classification: Minor

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

Description: Failed to maintain an up-to-date chemical and microbiological monitoring plan that is subject to the review and approval of the Executive Director, and a copy of which is maintained at each water treatment plant and at a central leasting. Specifically, a copy of the manifering plan was not maintained at the plants.

location. Specifically, a copy of the monitoring plan was not maintained at the plants.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.42(f)(1)(E)(ii)

Description: Failed to provide adequate containment facilities for all liquid chemical storage tanks. Specifically, containment facilities were not provided for the sulfuric acid and polyphosphate tanks at plant No. 1 and the polyphosphate

tank at plant No. 2. Classification: Moderate

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

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

Description: Failed to provide two or more pumps having a total capacity of 2.0 gallons per minute ("gpm") per connection at each pump station or pressure plane. Specifically, with 296 connections, 592 gpm of pump capacity is required. However, only 450 gpm was provided, indicating a 24% deficiency.

Classification: Moderate

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

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

Description: Failed to provide an elevated storage capacity of 100 gallons per connection or a pressure tank capacity of 20 gallons per connection. Specifically, with 296 connections, 29,600 gallons of elevated storage capacity, or 5,920 gallons of pressure tank capacity, is required. However, only 5,727 gallons and 3,500 gallons were provided, respectively, indicating a 41% deficiency.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.39(j) 5A THSC Chapter 341, SubChapter A 341.0351

Description: Failed to notify the Executive Director prior to making any significant change or addition to the system's production, treatment, storage, pressure maintenance, or distribution facilities. Specifically, the water system began operating as one pressure plane instead of two resulting in a change in the Facility's production and capacity without first notifying the Executive Director.

2 Effective Date: 03/06/2020 ADMINORDER 2019-0836-PWS-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM LRAA MCL 1Q2019 - During the first quarter of 2019 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.147 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.127 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM LRAA MCL 4Q2018 - During the fourth quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.178 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.159 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM LRAA MCL 3Q2018 - During the third quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.160 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.148 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM LRAA MCL 2Q2018 - During the second quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.127 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.133 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rgmt Prov: 2016-1302 ORDER

Description: TTHM LRAA MCL 1Q2018 - During the first quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.108 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.103 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM LRAA MCL 4Q2017 - During the fourth quarter of 2017 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.103 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.094 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM LRAA MCL 3Q2017 - During the third quarter of 2017 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.097 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.086 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

5A THSC Chapter 341, SubChapter A 341.0315

Rgmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM LRAA MCL 2Q2017 - During the second quarter of 2017 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.100 mg/L at 2441 Piney Creek Road, Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and with a LRAA of 0.007 mg/L at 205 V/R Woodlake (DBP2-01) and 0.007 mg/L at 205 V/R Woodlake (DBP2-0

0.097 mg/L at 205 V B Wood Rd Woodlake (DBP2-02).

Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.117(j)

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: LCR LCN 06/01/2017 to 09/30/2017- The system failed to provide a consumer notice of lead tap water monitoring results to persons served at the sites (taps) that were tested during the reduced monitoring period from 01/01/2015 to 12/31/2017.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(3)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM DBP2 MCL PN 4Q2018 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the fourth quarter of 2018.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(3)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Rgmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM DBP2 MCL PN 3Q2018 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the third quarter of 2018.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(3)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM DBP2 MCL PN 2Q2018 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the second quarter of 2018.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(3)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM DBP2 MCL PN 1Q2018 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the first quarter of 2018.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(3)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM DBP2 MCL PN 4Q2017 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the fourth quarter of 2017.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(3)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM DBP2 MCL PN 3Q2017 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the third quarter of 2017.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(3)(A)

30 TAC Chapter 290, SubChapter F 290.122(f)

Rgmt Prov: 2016-1302-PWS-E ORDER

Description: TTHM DBP2 MCL PN 2Q2017 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the

time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during

the second quarter of 2017. Classification: Moderate

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

30 TAC Chapter 290, SubChapter F 290.122(f)

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: DBP2 TTHM OEL Reporting PN Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a trihalomethanes operational evaluation level reporting violation at 2441 Piney Creek Road, Woodlake (DBP2-01) and 205 V B Wood Rd, Woodlake (DBP2-02).

Classification: Minor

Citation: 2A TWC Chapter 5, SubChapter A 5.702 30 TAC Chapter 291, SubChapter D 291.76

Rqmt Prov: 2016-1302-PWS-E ORDER

Description: Failed to pay regulatory assessment fees for the TCEQ Public Utility Account regarding Certificate of Convenience and Necessity No. 10936 for the calendar years 2016 and 2018.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

N/A

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

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

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	8	
CONCERNING	8	TEXAS COMMISSION ON
WOODLAKE-JOSSERAND	8	TEXAS COMMISSION ON
WATER SUPPLY CORPORATION	8	
RN101452621	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2021-0979-PWS-E

On	, the Texas Commission on Environmental Quality ("the
Commission" or "To	CEQ") considered this agreement of the parties, resolving an enforcement
action regarding W	OODLAKE-JOSSERAND WATER SUPPLY CORPORATION (the
"Respondent") und	er the authority of Tex. Health & Safety Code ch. 341. The Executive
Director of the TCE	Q, through the Enforcement Division, and the Respondent presented this
Order to the Comm	ission.

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 3908 East United States Highway 287 near Groveton, Trinity County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 303 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 record reviews conducted for the Facility on May 24, 2021 through May 28, 2021 and on June 14, 2021, investigators documented that the Respondent:
 - a. Did not mail or directly deliver one copy of the Consumer Confidence Report ("CCR") to each bill paying customer by July 1 for each year, and failed to submit to the TCEQ by July 1 for each year a copy of the annual CCR and certification that the CCR has been distributed to the customers of the Facility and that the

- information in the CCR is correct and consistent with compliance monitoring data for the calendar years 2018 and 2019.
- b. Did not provide a consumer notification of lead tap water monitoring results to persons served at the sites (taps) that were tested, and failed to mail a copy of the consumer notification of tap results to the Executive Director along with certification that the consumer notification was distributed in a manner consistent with TCEQ requirements for the January 1, 2020 through December 31, 2020 monitoring period.
- c. Did not provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to comply with the maximum contaminant level ("MCL") for total trihalomethanes ("TTHM") based on the locational running annual average for the second quarter of 2017 through the fourth quarter of 2018. Specifically, letters from the Executive Director required public notification be provided by September 11, 2017 for the second quarter of 2017, January 14, 2018 for the third quarter of 2017, March 7, 2018 for the fourth quarter of 2017, June 20, 2018 for the first quarter of 2018, September 27, 2018 for the second quarter of 2018, December 27, 2018 for the third quarter of 2018, and April 3, 2019 for the fourth quarter of 2018.
- d. Did not provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to submit a written operation evaluation report to the Executive Director within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 and Site 2 during the fourth quarter of 2017.
- 3. During an investigation conducted at the Facility on October 12, 2021, investigators documented that:
 - a. The standpipe at Plant No. 2 was not inspected in 2020.
 - b. The waterline located along the west side of V.B. Woods Road is looped while the distribution map did not show it was looped.
 - c. The boil water notice posted on August 25, 2021, and the associated rescind notice did not follow the specified language and format and were not signed and dated.
 - d. Gas chlorine and polyphosphate are considered incompatible and were stored in the same room.
 - e. The seam of the roof and siding of the ground storage tank at Plant No. 1 was rusted.

- f. The Facility had 196 connections in Pressure Plane No. 2 requiring a well capacity of 117.6 gallons per minute ("gpm"). However, only 96 gpm of well capacity was provided, indicating a 18% deficiency.
- g. Records for the results of storage tank inspections were not maintained on-site for review.
- h. The respondent did not maintain a thorough and up-to-date plant operations manual for operator review and reference.
- i. The Facility was operating the LaMotte 1200 series colorimeter with Hach N,N-diethyl-p-phenylenediamine ("DPD") pillow packets when it was required to run LaMotte DPD reagents.
- j. An up-to-date copy of the monitoring plan was not maintained at the plants.
- k. At Well No. 1, Highway 287 was noted within the existing 150-foot radius.
- l. Pressure Plane No. 2 had 196 connections requiring 19,600 gallons of elevated storage capacity. However, only 5,727 gallons of elevated storage capacity was provided, indicating a 71% deficiency.
- m. The well casing for Well No. 1 was rusted, the generator at Plant Nos. 1 and 2 were not functioning, and the sample tap connected to the feet-of-water gauge was heavily corroded.
- 4. The Executive Director recognizes that by October 12, 2021, the Respondent began maintaining water works operation and maintenance records at the Facility.

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 mail or directly deliver one copy of the CCR to each bill paying customer by July 1 for each year, and failed to submit to the TCEQ by July 1 for each year a copy of the annual CCR and certification that the CCR has been distributed to the customers of the Facility and that the information in the CCR is correct and consistent with compliance monitoring data, in violation of 30 Tex. ADMIN. CODE §§ 290.271(b) and 290.274(a) and (c).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to provide a consumer notification of lead tap water monitoring results to persons served at the sites (taps) that were tested, and failed to mail a copy of the consumer notification of tap results to the Executive Director along with certification that the consumer notification was distributed in a manner consistent with TCEQ requirements, in violation of 30 Tex.

ADMIN. CODE § 290.117(i)(6) and (j) and TCEQ Agreed Order Docket No. 2019-0836-PWS-E, Ordering Provision No. 2.a.i.

- 4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to comply with the MCL for TTHM based on the locational running annual average, in violation of TCEQ Agreed Order Docket No. 2019-0836-PWS-E, Ordering Provision No. 2.a.ii.
- 5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to submit a written operation evaluation report to the Executive Director within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for DBP2, in violation of TCEQ Agreed Order Docket No. 2019-0836-PWS-E, Ordering Provision No. 2.a.ii.
- 6. As evidenced by Finding of Fact No. 3.a, the Respondent failed to inspect the Facility's elevated storage tank ("EST") annually, in violation of 30 Tex. ADMIN. CODE § 290.46(m)(1)(A).
- 7. As evidenced by Finding of Fact No. 3.b, the Respondent failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in violation of 30 Tex. Admin. Code § 290.46(n)(2).
- 8. As evidenced by Finding of Fact No. 3.c, the Respondent failed to issue a boil water notification to the customers of the Facility using the applicable language and prescribed format specified in 30 Tex. Admin. Code § 290.47(c)(1), in violation of 30 Tex. Admin. Code § 290.46(q)(1).
- 9. As evidenced by Finding of Fact No. 3.d, the Respondent failed to provide separate containment facilities for chemicals that are incompatible, in violation of 30 TEX. ADMIN. CODE § 290.42(f)(1)(E)(ii)(IV).
- 10. As evidenced by Finding of Fact No. 3.e, 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).
- As evidenced by Finding of Fact No. 3.f, the Respondent failed to provide a well capacity of 0.6 gpm per connection, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c).
- As evidenced by Finding of Fact No. 3.g, the Respondent failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request, in violation of 30 Tex. ADMIN. CODE § 290.46(f)(2) and (f)(3)(D)(ii).

- As evidenced by Finding of Fact No. 3.h, 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(1).
- As evidenced by Finding of Fact No. 3.i, the Respondent failed to use an acceptable analytical method for disinfectant analyses, in violation of 30 Tex. ADMIN. CODE § 290.119(b)(7).
- As evidenced by Finding of Fact No. 3.j, the Respondent failed to maintain an up-to-date chemical and microbiological monitoring plan that is subject to the review and approval of the Executive Director, and a copy of which is maintained at each water treatment plant and at a central location, in violation of 30 Tex. ADMIN. CODE § 290.121(a) and TCEQ Agreed Order Docket No. 2018-1552-PWS-E, Ordering Provision No. 2.a.i.
- 16. As evidenced by Finding of Fact No. 3.k, the Respondent failed to obtain a sanitary control easement that covers the land within 150 feet of the Facility's wells, in violation of 30 Tex. Admin. Code § 290.41(c)(1)(f) and TCEQ Agreed Order Docket No. 2018-1552-PWS-E, Ordering Provision No. 2.c.
- As evidenced by Finding of Fact No. 3.l, the Respondent failed to provide an elevated storage capacity of 100 gallons per connection, in violation of 30 TEX. ADMIN. CODE § 290.45(b)(1)(C)(iv) and TEX. HEALTH & SAFETY CODE § 341.0315(c).
- 18. As evidenced by Finding of Fact No. 3.m, 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).
- 19. 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.
- 20. An administrative penalty in the amount of \$14,415 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 \$14,415 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. 20 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: WOODLAKE-JOSSERAND WATER SUPPLY CORPORATION, Docket No. 2021-0979-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. Mail or directly deliver one copy of the CCR prepared using the compliance data for the most recent calendar year to each bill paying customer and make a good faith effort to deliver the CCR to non-bill paying customers, in accordance with 30 Tex. ADMIN. CODE §§ 290.271 and 290.274;
 - ii. Provide consumer notification of lead tap water monitoring results to persons served at all sites (taps) that were tested during the January 1, 2020 through December 31, 2020 monitoring period. Submit to the Executive Director a sample copy of the consumer notification and certification that consumer notification was distributed in a manner consistent with TCEQ requirements, in accordance with 30 Tex. ADMIN. CODE § 290.117;
 - iii. Provide public notification and submit a copy of each public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to comply with the MCL for TTHM based on the locational running annual average for the second quarter of 2017 through the fourth quarter of 2018 and the failure to submit a written operation evaluation report to the Executive Director within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for DBP2 at Site 1 and Site 2 during the fourth quarter of 2017, in accordance with 30 Tex. ADMIN. CODE § 290.122;
 - iv. Implement procedures to ensure that all necessary public notifications are provided in a timely manner to persons served by the Facility and that a copy of the public notification, accompanied with a signed Certificate of Delivery, is submitted to the Executive Director, in accordance with 30 Tex. Admin. Code § 290.122;
 - v. Conduct an inspection of the Facility's EST, in accordance with 30 TEX. ADMIN. CODE § 290.46;

- vi. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in accordance with 30 Tex. Admin. Code § 290.46;
- vii. Develop and begin maintaining a written protocol that is to be followed to ensure boil water notifications are provided to customers in the specified format and provided to the Executive Director within 24 hours or no later than the next business day after issuance, in accordance with 30 Tex. ADMIN. CODE § 290.46;
- viii. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including repairing the seam of the roof and siding of the ground storage tank at Plant No. 1, the well casing for Well No. 1, the generators at Plant Nos. 1 and 2, and the sample tap connected to the feet-of-water gauge, in accordance with 30 Tex. Admin. Code § 290.46; and
- ix. Update the Facility's operational guidance and conduct employee training to ensure that the LaMotte 1200 series colorimeter is being operated with LaMotte DPD reagents, in accordance with 30 Tex. ADMIN. CODE § 290.119.
- b. Within 45 days after the effective date of this Order:
 - i. 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.ix; and
 - ii. Submit to the Commission a copy of the CCR provided to customers of the Facility and the certification that the CCR has been provided to the customers of the Facility and that the information in the CCR is correct and consistent with the compliance monitoring data, in accordance with 30 Tex. Admin. Code § 290.274. The copy of the CCR and certification shall be mailed to:

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

- c. Within 60 days after the effective date of this Order:
 - i. 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.b.ii;
- ii. 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; and
- iii. Develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference, in accordance with 30 Tex. ADMIN. CODE § 290.42.
- d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.h below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.d.ii and 2.d.iii.
- e. Within 90 days after the effective date of this Order:
 - i. Obtain a sanitary control easement that covers the land within 150 feet of the Facility's Well No. 1, in accordance with 30 Tex. Admin. Code § 290.41, or obtain Commission approval of an exception to the easement requirement pursuant to 30 Tex. Admin. Code § 290.39(l). The exception request shall be submitted to:

Technical Review and Oversight Team Water Supply Division, MC 159 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- ii. Provide separate containment facilities for the gas chlorine and polyphosphate storage containers, in accordance with 30 TEX. ADMIN. CODE § 290.42.
- f. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.h below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.e.i and 2.e.ii.
- g. Within 180 days after the effective date of this Order:
 - i. Provide an elevated storage capacity of at least 100 gallons per connection, in accordance with 30 TEX. ADMIN. CODE § 290.45; and

- ii. Provide a well capacity of at least 0.6 gpm per connection, in accordance with 30 Tex. ADMIN. CODE § 290.45.
- h. Within 195 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.g.i and 2.g.ii. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

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

and a copy to:

Water Section Manager Beaumont Regional Office Texas Commission on Environmental Quality 3870 Eastex Freeway Beaumont, Texas 77703-1830

- 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 Enforcement Division at the address listed above.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
- 7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- This Order may be executed in separate and multiple counterparts, which together shall 9. constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
- 10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
	5/15/2023
For the Executive Director	Date
the attached Order, and I do agree to the terr acknowledge that the TCEQ, in accepting pay on such representation.	d the attached Order. I am authorized to agree to ns and conditions specified therein. I further yment for the penalty amount, is materially relying
I also understand that failure to comply with and/or failure to timely pay the penalty amount	the Ordering Provisions, if any, in this Order unt, may result in:
 additional penalties, and/or attorney fe Increased penalties in any future enfor Automatic referral to the Attorney Gen TCEQ seeking other relief as authorize 	tions submitted; eneral's Office for contempt, injunctive relief, ees, or to a collection agency; ecement actions; eral's Office of any future enforcement actions; and d by law.
In addition, any falsification of any complian	nce documents may result in criminal prosecution.
Signature Name (Printed or typed) Authorized Representative of WOODLAKE-JOSSERAND WATER SUPPL	1-ale-a3 Date Title VCORPORATION
	check this hay and provide the new address below