

Executive Summary – Enforcement Matter – Case No. 61425
Coleman County Special Utility District
RN101212520
Docket No. 2021-1332-PWS-E

Order Type:

Findings Agreed Order

Findings Order Justification:

Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).

Media:

PWS

Small Business:

No

Location(s) Where Violation(s) Occurred:

Coleman County Special Utility District, 214 Santa Anna Avenue, Coleman, Coleman 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: June 24, 2022

Comments Received: No

Penalty Information

Total Penalty Assessed: \$8,540

Total Paid to General Revenue: \$8,540

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Unclassified

Site/RN - N/A

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: September 6, 2021 through September 24, 2021

Date(s) of NOE(s): September 24, 2021

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Coleman County Special Utility District
RN101212520
Docket No. 2021-1332-PWS-E

Violation Information

1. Failed to collect lead and copper tap samples at the required 20 sample sites, have the samples analyzed, and report the results to the Executive Director (“ED”) [30 TEX. ADMIN. CODE § 290.117(c)(2)(C), (h), and (i)(1)].
2. Failed to collect lead and copper tap samples at the required 20 sample sites, have the samples analyzed, and report the results to the ED [30 TEX. ADMIN. CODE § 290.117(c)(2)(B), (h), and (i)(1)].
3. Failed to collect lead and copper tap samples at the required 40 sample sites, have the samples analyzed, and report the results to the ED [30 TEX. ADMIN. CODE § 290.117(c)(2)(A), (h), and (i)(1)].
4. Failed to provide the results of nitrite/nitrate sampling to the ED [30 TEX. ADMIN. CODE § 290.106(e)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Respondent shall undertake the following technical requirements:

- a. Within 30 days:
 - i. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that all future lead and copper tap samples are collected, analyzed, and the results are reported to the ED within ten days following the end of each monitoring period;
 - ii. Collect the required number of lead and copper tap samples, have the samples analyzed, and report the results to the ED within ten days following the end of the monitoring period;
 - iii. Ensure that all delinquent drinking water chemical analysis results for nitrite/nitrate are reported to the ED; and
 - iv. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that future drinking water chemical sample results for nitrite/nitrate are released by the Facility's laboratories and reported to the ED within the first ten days following the month in which the results are received by the public

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water system, or the first ten days following the end of the monitoring period, whichever occurs first.

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

c. Within 225 days, submit written certification to demonstrate compliance with a.ii.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Miles Wehner, Enforcement Division, Enforcement Team 4, MC 219, (512) 239-2813; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Robert Mann, President, Coleman County Special Utility District, 214 Santa Anna Avenue, Coleman, Texas 76834

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	27-Sep-2021	Screening	1-Oct-2021	EPA Due	30-Jun-2021
	PCW	4-Oct-2021				

RESPONDENT/FACILITY INFORMATION

Respondent	Coleman County Special Utility District (PCW No. 1)				
Reg. Ent. Ref. No.	RN101212520				
Facility/Site Region	3-Abilene	Major/Minor Source	Major		

CASE INFORMATION

Enf./Case ID No.	61425	No. of Violations	2
Docket No.	2021-1332-PWS-E	Order Type	Findings
Media Program(s)	Public Water Supply	Government/Non-Profit	Yes
Multi-Media		Enf. Coordinator	Carlos Molina
		EC's Team	Enforcement Team 2
Admin. Penalty \$ Limit Minimum	\$50	Maximum	\$1,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$600
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	40.0%	Adjustment	Subtotals 2, 3, & 7	\$240
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Notes

Enhancement for one order without denial of liability and three NOVs with the same/similar violations.

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes

The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts
Estimated Cost of Compliance

\$774
\$760

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$840
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount	\$840
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$840
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes

No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$840
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Screening Date	1-Oct-2021	Docket No.	2021-1332-PWS-E	PCW
Respondent	Coleman County Special Utility District (PCW No. 1)			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	61425			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN101212520			
Media	Public Water Supply			
Enf. Coordinator	Carlos Molina			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	3	15%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	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 and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	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 (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	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%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 40%

>> Repeat Violator (Subtotal 3)

N/A

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Unclassified

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one order without denial of liability and three NOVs with the same/similar violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 40%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 40%

Screening Date	1-Oct-2021	Docket No.	2021-1332-PWS-E	PCW
Respondent Case ID No.	Coleman County Special Utility District (PCW No. 1)	<i>Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN101212520			
Media	Public Water Supply			
Enf. Coordinator	Carlos Molina			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 290.117(c)(2)(C), (h), and (i)(1)			
Violation Description	Failed to collect lead and copper tap samples at the required 20 sample sites, have the samples analyzed, and report the results to the Executive Director for the January 1, 2015 through December 31, 2017 monitoring period. Specifically, the Respondent collected only 18 of the required 20 lead and copper tap samples from the distribution system.			
Base Penalty			\$1,000	
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Release	Major	Moderate	Minor
	Actual			
	Potential	x		
Percent			30.0%	
>>Programmatic Matrix				
	Falsification	Major	Moderate	Minor
	Percent			0.0%
	Matrix Notes	Failure to collect lead and copper tap samples could expose persons served by the Facility to undetected contaminants which would exceed levels protective of human health.		
Adjustment			\$700	
			\$300	
Violation Events				
Number of Violation Events		1	1095	Number of violation days
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual			
single event	x			
One single event is recommended.				
Good Faith Efforts to Comply		0.0%	Reduction \$0	
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary				
Ordinary				
N/A	x			
Notes	The Respondent does not meet the good faith criteria for this violation.			
Violation Subtotal			\$300	
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount	\$79	Violation Final Penalty Total	\$420	
This violation Final Assessed Penalty (adjusted for limits)			\$420	

Economic Benefit Worksheet

Respondent Coleman County Special Utility District (PCW No. 1)
Case ID No. 61425
Reg. Ent. Reference No. RN101212520
Media Public Water Supply
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$100	6-Sep-2021	22-Oct-2022	1.13	\$6	n/a	\$6
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost includes the estimated amount to implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that future lead and copper tap samples are collected by the Facility personnel, analyzed, and reported to the Executive Director, calculated from the record review date to the estimated date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
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	\$60	30-Sep-2017	1-Oct-2021	4.01	\$13	\$60	\$73
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

The avoided cost includes the estimated amount to collect and have analyzed the required lead and copper samples (\$30 per sample x two samples x one monitoring period), calculated from the date sampling was required to the date of screening.

Approx. Cost of Compliance

\$160

TOTAL

\$79

Screening Date 1-Oct-2021 Respondent Coleman County Special Utility District (PCW No. 1) Case ID No. 61425 Reg. Ent. Reference No. RN101212520 Media Public Water Supply Enf. Coordinator Carlos Molina	Docket No. 2021-1332-PWS-E Base Penalty \$1,000	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	2	Rule Cite(s)	
		30 Tex. Admin. Code § 290.117(c)(2)(B), (h), and (i)(1)	
Violation Description	Failed to collect lead and copper tap samples at the required 20 sample sites, have the samples analyzed, and report the results to the Executive Director for the January 1, 2018 through December 31, 2018 monitoring period.		

Base Penalty

\$1,000

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	Percent <div style="border: 1px solid black; padding: 2px 20px;">30.0%</div>
	Potential	<div style="border: 1px solid black; width: 40px; height: 15px; text-align: center;">x</div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	Percent <div style="border: 1px solid black; padding: 2px 20px;">0.0%</div>

Matrix Notes	Failure to collect lead and copper tap samples could expose persons served by the Facility to undetected contaminants which would exceed levels protective of human health.
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Adjustment

\$700

\$300

Violation Events

Number of Violation Events	<div style="border: 1px solid black; padding: 2px 20px;">1</div>	<div style="border: 1px solid black; padding: 2px 20px;">365</div>	Number of violation days
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	daily	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>		Violation Base Penalty <div style="border: 1px solid black; padding: 2px 20px;">\$300</div>
	weekly	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	
	monthly	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	
	quarterly	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	
	semiannual	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	
	annual	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	
	single event	<div style="border: 1px solid black; width: 40px; height: 15px; text-align: center;">x</div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	

One single event is recommended.

Good Faith Efforts to Comply

	<div style="border: 1px solid black; padding: 2px 20px;">0.0%</div>	
	Before NOE/NOV	NOE/NOV to EDP RP/Settlement Offer
Extraordinary	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>
Ordinary	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>
N/A	<div style="border: 1px solid black; width: 40px; height: 15px; text-align: center;">x</div>	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>
Notes	The Respondent does not meet the good faith criteria for this violation.	

Violation Subtotal

\$300

Economic Benefit (EB) for this violation

Estimated EB Amount	<div style="border: 1px solid black; padding: 2px 20px;">\$695</div>	Statutory Limit Test
		Violation Final Penalty Total <div style="border: 1px solid black; padding: 2px 20px;">\$420</div>
		This violation Final Assessed Penalty (adjusted for limits) <div style="border: 1px solid black; padding: 2px 20px;">\$420</div>

Economic Benefit Worksheet

Respondent Coleman County Special Utility District (PCW No. 1)
Case ID No. 61425
Reg. Ent. Reference No. RN101212520
Media Public Water Supply
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The delayed cost to implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that future lead and copper tap samples are collected by the Facility personnel, analyzed, and reported to the Executive Director is captured in the Economic Benefit Worksheet for Violation No. 1.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
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	\$600	30-Sep-2018	1-Oct-2021	3.01	\$95	\$600	\$695
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

The avoided cost includes the estimated amount to collect and have analyzed the required lead and copper samples (\$30 per sample x 20 samples x one monitoring period), calculated from the date sampling was required to the date of screening.

Approx. Cost of Compliance

\$600

TOTAL

\$695



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	27-Sep-2021			
	PCW	4-Oct-2021	Screening	1-Oct-2021	EPA Due 30-Jun-2021

RESPONDENT/FACILITY INFORMATION					
Respondent	Coleman County Special Utility District (PCW No. 2)				
Reg. Ent. Ref. No.	RN101212520				
Facility/Site Region	3-Abilene	Major/Minor Source	Major		

CASE INFORMATION					
Enf./Case ID No.	61425	No. of Violations	2		
Docket No.	2021-1332-PWS-E	Order Type	Findings		
Media Program(s)	Public Water Supply	Government/Non-Profit	Yes		
Multi-Media		Enf. Coordinator	Carlos Molina		
		EC's Team	Enforcement Team 2		
Admin. Penalty \$	Limit Minimum	\$50	Maximum	\$5,000	

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$5,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	40.0%	Adjustment	Subtotals 2, 3, & 7	\$2,200
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Notes	Enhancement for one order without denial of liability and three NOV's with the same/similar violations.			
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Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes	The Respondent does not meet the culpability criteria.			
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Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$3,742	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$3,798	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$7,700
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes		Final Penalty Amount	\$7,700
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$7,700
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes	No deferral is recommended for Findings Orders.		
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PAYABLE PENALTY	\$7,700
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Screening Date

1-Oct-2021

Docket No.

2021-1332-PWS-E

PCW

Respondent

Coleman County Special Utility District (PCW No. 2)

Case ID No.

61425

Reg. Ent. Reference No.

RN101212520

Media

Public Water Supply

Enf. Coordinator

Carlos Molina

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Compliance History Worksheet			
>> Compliance History Site Enhancement (Subtotal 2)			
Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	3	15%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	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 and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	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 (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	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%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
Adjustment Percentage (Subtotal 2)			40%
>> Repeat Violator (Subtotal 3)			
N/A			Adjustment Percentage (Subtotal 3) 0%
>> Compliance History Person Classification (Subtotal 7)			
Unclassified			Adjustment Percentage (Subtotal 7) 0%
>> Compliance History Summary			
Compliance History Notes	Enhancement for one order without denial of liability and three NOVs with the same/similar violations.		
Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)			40%
>> Final Compliance History Adjustment			
Final Adjustment Percentage *capped at 100%			40%

Screening Date 1-Oct-2021		Docket No. 2021-1332-PWS-E		PCW	
Respondent Coleman County Special Utility District (PCW No. 2)		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 61425		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN101212520					
Media Public Water Supply					
Enf. Coordinator Carlos Molina					
Violation Number		1			
Rule Cite(s)		30 Tex. Admin. Code § 290.117(c)(2)(A), (h), and (i)(1)			
Violation Description		Failed to collect lead and copper tap samples at the required 40 sample sites, have the samples analyzed, and report the results to the Executive Director for the January 1, 2020 through June 30, 2020, July 1, 2020 through December 31, 2020, and January 1, 2021 through June 30, 2021 monitoring periods.			
		Base Penalty		\$5,000	
>> Environmental, Property and Human Health Matrix					
OR	Release		Harm		
	Major	Moderate	Minor		
	Actual				
	Potential	x		Percent	30.0%
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	Failure to collect lead and copper tap samples could expose persons served by the Facility to undetected contaminants which would exceed levels protective of human health.				
Adjustment				\$3,500	
				\$1,500	
>> Violation Events					
Number of Violation Events		3		547 Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly				
	semiannual				
	annual				
	single event	x			
		Violation Base Penalty \$4,500			
Three single events are recommended (one event per monitoring period).					
Good Faith Efforts to Comply		0.0%		Reduction \$0	
	Extraordinary	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Ordinary				
	N/A	x			
Notes	The Respondent does not meet the good faith criteria for this violation.				
Violation Subtotal				\$4,500	
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$3,735		Violation Final Penalty Total \$6,300	
This violation Final Assessed Penalty (adjusted for limits)				\$6,300	

Economic Benefit Worksheet

Respondent Coleman County Special Utility District (PCW No. 2)
Case ID No. 61425
Reg. Ent. Reference No. RN101212520
Media Public Water Supply
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed cost to implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that future lead and copper tap samples are collected by the Facility personnel, analyzed, and reported to the Executive Director, is captured in the Economic Benefit Worksheet for Violation No. 1 in PCW No. 1.						

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
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	\$3,689	30-Jun-2021	1-Oct-2021	0.25	\$46	\$3,689	\$3,735
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs	The avoided cost includes the estimated amount to collect and have analyzed the required lead and copper samples (\$30 per sample x 40 samples x three monitoring periods) and accrued interest, calculated from the last date the sampling was required to the date of screening.						

Approx. Cost of Compliance	\$3,689	TOTAL	\$3,735
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Screening Date	1-Oct-2021	Docket No.	2021-1332-PWS-E	PCW
Respondent	Coleman County Special Utility District (PCW No. 2)			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	61425			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN101212520			
Media	Public Water Supply			
Enf. Coordinator	Carlos Molina			
Violation Number	2			
Rule Cite(s)	30 Tex. Admin. Code § 290.106(e)			
Violation Description	Failed to provide the results of nitrite/nitrate sampling to the Executive Director for the January 1, 2020 through December 31, 2020 monitoring period.			
		Base Penalty	\$5,000	

>> Environmental, Property and Human Health Matrix

OR

	Release	Harm	
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor
		x		

Percent 20.0%

Matrix Notes

100% of the rule requirements were not met.

Adjustment \$4,000

Violation Events

Number of Violation Events 1

264

Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$1,000

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$1,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$7

Violation Final Penalty Total \$1,400

This violation Final Assessed Penalty (adjusted for limits) \$1,400

Economic Benefit Worksheet

Respondent Coleman County Special Utility District (PCW No. 2)
Case ID No. 61425
Reg. Ent. Reference No. RN101212520
Media Violation No. Public Water Supply
2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$100	6-Sep-2021	22-Oct-2022	1.13	\$6	n/a	\$6
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$9	10-Jan-2021	22-Oct-2022	1.78	\$1	n/a	\$1

Notes for DELAYED costs

The Training/Sampling cost includes the estimated cost to implement process procedures, guidance, training, and/or oversight to ensure that future drinking water sample results are released by the Facility's laboratories and reported to the Executive Director, calculated from the record review date to the estimated date of compliance.

The Other (as needed) cost includes the estimated amount to pay any outstanding lab fees (\$8.74 for nitrite/nitrate) so that the lab will release all drinking water chemical analysis results, calculated from the date the sampling results were due to the estimated date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
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 \$109

TOTAL \$7



Compliance History Report

Compliance History Report for CN602693145, RN101212520, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator:	CN602693145, Coleman County Special Utility District	Classification:	UNCLASSIFIED	Rating:	-----
Regulated Entity:	RN101212520, COLEMAN COUNTY SUD	Classification:	NOT APPLICABLE	Rating:	N/A
Complexity Points:	N/A	Repeat Violator:	N/A		
CH Group:	14 - Other				
Location:	214 SANTA ANNA AVENUE IN COLEMAN, COLEMAN COUNTY, TEXAS				
TCEQ Region:	REGION 03 - ABILENE				
ID Number(s):					
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION	0420034	WATER LICENSING LICENSE	0420034		
Compliance History Period:	September 01, 2016 to August 31, 2021	Rating Year:	2021	Rating Date:	09/01/2021
Date Compliance History Report Prepared:	February 25, 2022				
Agency Decision Requiring Compliance History:	Enforcement				
Component Period Selected:	February 25, 2017 to February 25, 2022				
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.					
Name:	Carlos Molina		Phone:	(512) 239-2557	

Site and Owner/Operator History:

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

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

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

- | | | |
|---|--|---|
| 1 | Effective Date: 06/13/2017 | ADMINORDER 2016-1664-PWS-E (Findings Order-Agreed Order Without Denial) |
| | Classification: Major | |
| | Citation: 30 TAC Chapter 290, SubChapter F 290.106(f)(2) | |
| | 5A THSC Chapter 341, SubChapter A 341.0315(a) | |
| | Description: NO2 AMCL 3Q2015 - This system exceeded the MCL of 1 mg/L for nitrite with a sample result of 2 mg/L collected on 09/24/2015 for EP003; a sample result of 2 mg/L collected on 09/24/2015 for EP001. | |
| | Classification: Moderate | |
| | Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1) | |
| | 5A THSC Chapter 341, SubChapter A 341.0315(c) | |
| | Description: HAA5 LRAA MCL 2Q2016 - During the second quarter of 2016 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.064 mg/L at Novice Sample Site: Parker at 8th (DBP2-02). | |

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

- | | | |
|--------|-------------------|-----------|
| Item 1 | August 16, 2017 | (1434897) |
| Item 2 | February 04, 2019 | (1540326) |

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

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

- | | | | |
|---|--|--------------------------|--|
| 1 | Date: 03/19/2021 (1762762) | | |
| | Self Report? NO | Classification: Moderate | |
| | Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.117(h)
30 TAC Chapter 290, SubChapter F 290.117(i)(1) | | |
| | Description: LCR RT MR 2nd 6M2020 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the routine six-month monitoring period from 07/01/2020 to 12/31/2020 within the required timeline. | | |
| | | | |
| 2 | Date: 03/31/2021 (1762762) | | |
| | Self Report? NO | Classification: Moderate | |
| | Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(4)
30 TAC Chapter 290, SubChapter F 290.106(c)(6)
30 TAC Chapter 290, SubChapter F 290.106(c)(7)
30 TAC Chapter 290, SubChapter F 290.106(c)(9)
30 TAC Chapter 290, SubChapter F 290.106(e) | | |
| | Description: NO32 MR YR2020 - The system failed to monitor and/or report nitrate and nitrite levels to the TCEQ for the annual monitoring period from 01/01/2020 to 12/31/2020 within the required timeline. | | |
| | | | |
| 3 | Date: 09/01/2021 (1762762) | | |
| | Self Report? NO | Classification: Moderate | |
| | Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.117(h)
30 TAC Chapter 290, SubChapter F 290.117(i)(1) | | |
| | Description: LCR RT MR 1st 6M2021 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the routine six-month monitoring period from 01/01/2021 to 06/30/2021 within the required timeline. | | |

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
ENFORCEMENT ACTION
CONCERNING
COLEMAN COUNTY SPECIAL
UTILITY DISTRICT
RN101212520**

**§ BEFORE THE
§
§ TEXAS COMMISSION ON
§
§ ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2021-1332-PWS-E

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

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

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

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

I. FINDINGS OF FACT

1. The Respondent owns and operates a public water supply located at 214 Santa Anna Avenue in Coleman, Coleman County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 2,524 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 a record review conducted on September 6, 2021 through September 24, 2021, an investigator documented that:
 - a. The Respondent collected only 18 of the required 20 lead and copper tap samples from the distribution system for the January 1, 2015 through December 31, 2017 monitoring period;

- b. The Respondent did not collect lead and copper tap samples from the required 20 sample sites for the January 1, 2018 through December 31, 2018 monitoring period;
- c. The Respondent did not collect lead and copper tap samples from the required 40 sample sites during the January 1, 2020 through June 30, 2020, July 1, 2020 through December 31, 2020, and January 1, 2021 through June 30, 2021 monitoring periods; and
- d. The Respondent did not provide the results of nitrite/nitrate sampling for the January 1, 2020 through December 30, 2020 monitoring period.

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 collect lead and copper tap samples at the required 20 sample sites, have the samples analyzed, and report the results to the Executive Director, in violation of 30 TEX. ADMIN. CODE § 290.117(c)(2)(C), (h), and (i)(1).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to collect lead and copper tap samples at the required 20 sample sites, have the samples analyzed, and report the results to the Executive Director, in violation of 30 TEX. ADMIN. CODE § 290.117(c)(2)(B), (h), and (i)(1).
- 4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to collect lead and copper tap samples at the required 40 sample sites, have the samples analyzed, and report the results to the Executive Director, in violation of 30 TEX. ADMIN. CODE § 290.117(c)(2)(A), (h), and (i)(1).
- 5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to provide the results of nitrite/nitrate sampling to the Executive Director, in violation of 30 TEX. ADMIN. CODE § 290.106(e).
- 6. 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.
- 7. An administrative penalty in the amount of \$8,540 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 \$8,540 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. 7 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: Coleman County Special Utility District, Docket No. 2021-1332-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. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that all future lead and copper tap samples are collected, analyzed, and the results are reported to the Executive Director within ten days following the end of each monitoring period, in accordance with 30 TEX. ADMIN. CODE § 290.117;
 - ii. Collect the required number of lead and copper tap samples, have the samples analyzed, and report the results to the Executive Director within ten days following the end of the monitoring period, in accordance with 30 TEX. ADMIN. CODE § 290.117. This provision will be satisfied upon the timely delivery of all lead and copper tap sampling results to the Executive Director for one compliant monitoring period;
 - iii. Ensure that all delinquent drinking water chemical analysis results for nitrite/nitrate are reported to the Executive Director, in accordance with 30 TEX. ADMIN. CODE § 290.106; and
 - iv. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that future drinking water chemical sample results for nitrite/nitrate are released by the Facility's laboratories and reported to the Executive Director within the first ten days following the month in which the results are received by the public water system, or

the first ten days following the end of the monitoring period, whichever occurs first, in accordance 30 TEX. ADMIN. CODE § 290.106.

- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.c below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.i, 2.a.iii, and 2.a.iv.
- c. Within 225 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a.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:

Order Compliance Team
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

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and

substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date


For the Executive Director

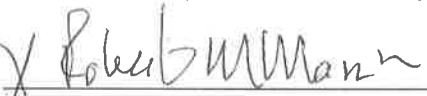
1/13/2023
Date

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

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

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

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


Signature

12/14/22
Date

Robert M. Mann
Name (Printed or typed)

President
Title

Authorized Representative of
Coleman County Special Utility District

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

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.