Laredo Holdings Investments, LLC
RN110827730
Docket No. 2021-1637-PWS-E

Order Type:
Default Order

Media:
PWS

Small Business:
N/A

Location Where Violation Occurred:
23183 Interstate Highway 35, near Encinal, Webb County

Type of Operation:
public water system

Other Significant Matters:

Additional Pending Enforcement Actions:	None
Past-Due Penalties:	None
Past-Due Fees:	None
Other:	None
Interested Third Parties:	None

Texas Register Publication Date: August 25, 2023

Comments Received: None

Penalty Information

Total Penalty Assessed: $1,020

Total Paid to General Revenue: $0

Total Due to General Revenue: $1,020

Compliance History Classifications:
Person/CN – Satisfactory
Site/RN – Satisfactory

Major Source: No

Statutory Limit Adjustment: None

Applicable Penalty Policy: January 28, 2021

Investigation Information

Complaint Date: November 5, 2020

Complaint Information: A wastewater complaint was received in the Laredo Region Office.

A public water system complaint was received in the Laredo Region Office.

Dates of Investigation: November 6, 2020; November 9, 2021

Date of NOV: January 5, 2021

Date of NOE: November 30, 2021

Violation Information

1. Failed to submit plans and specifications to the Executive Director for review and approval prior to the construction of a new public water supply [TEX. HEALTH & SAFETY CODE § 341.035(a) and 30 TEX. ADMIN. CODE § 290.39(e)(1) and (h)(1)].
2. Failed to submit well completion data for review and approval prior to placing the Facility's public drinking water well into service [30 TEX. ADMIN. CODE § 290.41(c)(3)(A)].

Corrective Actions/Technical Requirements

Corrective Action Completed:
None

Technical Requirements:

1. Within 180 days:
   i. Submit plans and specifications of the public water supply for review and approval. Respond completely and adequately to all requests for information concerning plans and specifications.
   ii. Submit well completion data for review and approval of the Facility's public drinking water well. Respond completely and adequately to all requests for information concerning the well completion data.
2. Within 270 days:
   i. Obtain approval of the plans and specifications for the public water supply system.
   ii. Obtain approval of the well completion data for the Facility's public drinking water well.
3. Submit written certification to demonstrate compliance:
   a. Within 195 days for Technical Requirement Nos. 1.i. and 1.ii.
   b. Within 285 days for Technical Requirement Nos. 2.i. and 2.ii.

Litigation Information

Date Petition Filed: April 27, 2023

Date of Service: April 29, 2023

Date Answer Filed: N/A

Contact Information

TCEQ Attorneys: Erandi Ratnayake, Litigation Division, (512) 239-3400
Sheldon Wayne, Public Interest Counsel, (512) 239-6363

TCEQ Litigation Agenda Coordinator: Katherine McKenzie, Litigation Division, (512) 239-2575

TCEQ Enforcement Coordinator: Ronica Scott, Enforcement Division, (361) 881-6990

TCEQ Regional Contact: Arnaldo Lanese, Laredo Regional Office, (956) 791-6611

Respondent Contact: Karim Khanmohamed, Director & Managing Member, Laredo Holdings Investments, LLC, 20 Westerleigh, San Antonio, Texas 78218

Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW)

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

DATES						
Assigned	6-Dec-2021					
PCW	13-Dec-2021	**Screening**	13-Dec-2021	**EPA Due**		

RESPONDENT/FACILITY INFORMATION

Respondent	Laredo Holdings Investments, LLC		
Reg. Ent. Ref. No.	RN110827730		
Facility/Site Region	16-Laredo	**Major/Minor Source**	Minor

CASE INFORMATION

Enf./Case ID No.	61688	**No. of Violations**	2
Docket No.	2021-1637-PWS-E	**Order Type**	1660
Media Program(s)	Public Water Supply	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	Ronica Rodriguez
		EC's Team	Enforcement Team 8

Admin. Penalty $ Limit Minimum $50 Maximum $5,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) — *Subtotal 1*: **$1,000**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History — **2.0%** Adjustment — *Subtotals 2, 3, & 7*: **$20**

Notes: Enhancement for one NOV with dissimilar violations.

Culpability — No — **0.0%** Enhancement — *Subtotal 4*: **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — *Subtotal 5*: **$0**

Economic Benefit — **0.0%** Enhancement* — *Subtotal 6*: **$0**

Total EB Amounts $806
Estimated Cost of Compliance $6,500

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — *Final Subtotal*: **$1,020**

OTHER FACTORS AS JUSTICE MAY REQUIRE — **0.0%** — *Adjustment*: **$0**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount: **$1,020**

STATUTORY LIMIT ADJUSTMENT — *Final Assessed Penalty*: **$1,020**

DEFERRAL — **0.0%** Reduction — *Adjustment*: **$0**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral not offered for non-expedited settlement.

PAYABLE PENALTY: **$1,020**

Screening Date	13-Dec-2021	**Docket No.** 2021-1637-PWS-E	**PCW**
Respondent	Laredo Holdings Investments, LLC		*Policy Revision 5 (January 28, 2021)*
Case ID No.	61688		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN110827730		
Media	Public Water Supply		
Enf. Coordinator	Ronica Rodriguez		

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 (*number of NOVs meeting criteria*)	0	0%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	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	0	0%
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 (*number of judgments or consent decrees meeting criteria*)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	0	0%
	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%

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) 2%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with dissimilar violations.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** 2%

Screening Date	13-Dec-2021	**Docket No.** 2021-1637-PWS-E	**PCW**
Respondent	Laredo Holdings Investments, LLC		*Policy Revision 5 (January 28, 2021)*
Case ID No.	61688		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN110827730		
Media	Public Water Supply		
Enf. Coordinator	Ronica Rodriguez		

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 290.39(e)(1) and (h)(1) and Tex. Health & Safety Code § 341.035(a)

Violation Description Failed to submit plans and specifications to the Executive Director for review and approval prior to the construction of a new public water supply. Specifically, the Respondent was operating a business which meets the definition of a noncommunity public water supply without first obtaining approval.

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 10.0%

Matrix Notes: 100% of the rule requirements were not met.

Adjustment $4,500

$500

Violation Events

Number of Violation Events: 1 — 34 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $500

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 $500

Economic Benefit (EB) for this violation

Estimated EB Amount $620

Statutory Limit Test

Violation Final Penalty Total $510

This violation Final Assessed Penalty (adjusted for limits) $510

Economic Benefit Worksheet

Respondent Laredo Holdings Investments, LLC
Case ID No. 61688
Reg. Ent. Reference No. RN110827730
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
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)	$5,000	6-Nov-2020	30-Apr-2023	2.48	$620	n/a	$620
Notes for DELAYED costs	The delayed cost includes the estimated amount to develop and submit as-built plans and specifications for review and approval, calculated from the date of the investigation the violation was initially documented 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	$5,000	TOTAL	$620

Screening Date	13-Dec-2021	**Docket No.** 2021-1637-PWS-E	**PCW**
Respondent	Laredo Holdings Investments, LLC		*Policy Revision 5 (January 28, 2021)*
Case ID No.	61688		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN110827730		
Media	Public Water Supply		
Enf. Coordinator	Ronica Rodriguez		

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 290.41(c)(3)(A)

Violation Description Failed to submit well completion data for review and approval prior to placing the Facility's public drinking water well into service.

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 10.0%

Matrix Notes: 100% of the rule requirements werer not met.

Adjustment $4,500

$500

Violation Events

Number of Violation Events: 1 — 34 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $500

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 $500

Economic Benefit (EB) for this violation

Estimated EB Amount $186

Statutory Limit Test

Violation Final Penalty Total $510

This violation Final Assessed Penalty (adjusted for limits) $510

Economic Benefit Worksheet

Respondent Laredo Holdings Investments, LLC
Case ID No. 61688
Reg. Ent. Reference No. RN110827730
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
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$1,500	6-Nov-2020	30-Apr-2023	2.48	$186	n/a	$186
Notes for DELAYED costs	The delayed cost includes the estimated amount to complie well completion data and submit it for approval for the Facility's well, calculated from the date of the investigation the violation was initially documented 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	$1,500				TOTAL		$186

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

Compliance History Report

Compliance History Report for CN605839547, RN110827730, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator: CN605839547, Laredo Holdings Investments, LLC **Classification:** SATISFACTORY **Rating:** 4.00

Regulated Entity: RN110827730, FUEL AMERICA TRUCK STOP **Classification:** SATISFACTORY **Rating:** 4.00

Complexity Points: 1 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 23183 INTERSTATE HIGHWAY 35 NEAR ENCINAL, WEBB COUNTY, TEXAS

TCEQ Region: REGION 16 - LAREDO

ID Number(s):
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 2400046 **PETROLEUM STORAGE TANK REGISTRATION** REGISTRATION 90729

Compliance History Period: September 01, 2016 to August 31, 2021 **Rating Year:** 2021 **Rating Date:** 09/01/2021

Date Compliance History Report Prepared: August 29, 2022

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: August 29, 2017 to August 29, 2022

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

Name: Ronica Rodriguez **Phone:** (361) 881-6990

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five-year compliance period? 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:
N/A

B. Criminal convictions:
N/A

C. Chronic excessive emissions events:
N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):
Item 1 January 24, 2020 (1623249)
Item 2 March 20, 2020 (1637628)

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: 08/05/2022 (1832706)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(ii)(III)
Description: Failure to record the amount of water treated and distributed on a weekly basis.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III)
Description: Failure to record the amount of each chemical used on a weekly basis
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.109(d)(6)
Description: Failure to develop a complete sample siting plan (Revised Total Coliform Rule (RTCR)) which identifies repeat microbial sampling sites and is in a format specified by the executive director.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)
Description: Failure to conduct an annual tank inspection on the ground storage tank.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.110(c)(4)(A)
Description: Failure to monitor the chlorine residual in distribution on a weekly basis.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(4)
Description: Failure to complete the Disinfection Level Quarterly Operating Report (DLQOR) and maintain onsite.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
Description: Failure to provide records upon request.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(B)
Description: Failure to maintain a free chlorine residual of 0.2 milligrams per liter (mg/) in the distribution system.

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 LAREDO HOLDINGS INVESTMENTS, LLC; RN110827730	**§ § § § § §**	**BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

DEFAULT ORDER

DOCKET NO. 2021-1637-PWS-E

On _____, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered the Executive Director's Preliminary Report and Petition, filed pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and the rules of the TCEQ, which requests appropriate relief, including the imposition of an administrative penalty and corrective action of the respondent. The respondent made the subject of this Order is Laredo Holdings Investments, LLC ("Respondent").

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

FINDINGS OF FACT

1. Respondent owns and operates a public water system ("PWS") located at 23183 Interstate Highway 35 near Encinal, Webb County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 1 service connection, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a PWS as defined in 30 TEX. ADMIN. CODE § 290.38(71).

2. During an investigation conducted on November 6, 2020, and a record review conducted on November 9, 2021, an investigator documented that Respondent:

   a. Failed to submit plans and specifications to the Executive Director for review and approval prior to the construction of a new public water supply. Specifically, Respondent was operating a business which meets the definition of a noncommunity public water supply without first obtaining approval; and

   b. Failed to submit well completion data for review and approval prior to placing the Facility's public drinking water well into service.

3. The Executive Director filed the "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of Laredo Holdings Investments, LLC" (the "EDPRP") in the TCEQ Chief Clerk's office on April 27, 2023.

4. By letter dated April 27, 2023, sent to Respondent's last known address via certified mail, return receipt requested, postage prepaid, the Executive Director served Respondent with notice of the EDPRP. According to the return receipt "green card," Respondent received notice of the EDPRP on April 29, 2023, as evidenced by the signature on the card.

5. More than 20 days have elapsed since Respondent received notice of the EDPRP. Respondent failed to file an answer and failed to request a hearing.

CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, 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., Respondent failed to submit plans and specifications to the Executive Director for review and approval prior to the construction of a new public water supply, in violation of TEX. HEALTH & SAFETY CODE § 341.035(a) and 30 TEX. ADMIN. CODE 290.39(e)(1) and (h)(1).
3. As evidenced by Finding of Fact No. 2.b., Respondent failed to submit well completion data for review and approval prior to placing the Facility's public drinking water well into service, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(3)(A).
4. As evidenced by Findings of Fact Nos. 3 and 4, the Executive Director timely served Respondent with proper notice of the EDPRP, as required by TEX. HEALTH & SAFETY CODE § 341.049 and 30 TEX. ADMIN. CODE § 70.104(b)(1).
5. As evidenced by Finding of Fact No. 5, Respondent failed to file a timely answer as required by TEX. HEALTH & SAFETY CODE § 341.049 and 30 TEX. ADMIN. CODE § 70.105. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049 and 30 TEX. ADMIN. CODE § 70.106, the Commission may enter a Default Order against Respondent and assess the penalty recommended by the Executive Director.
6. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049(a) the Commission has the authority to assess an administrative penalty against Respondent for violations of state statutes within 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 one thousand twenty dollars ($1,020.00) 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).
8. TEX. WATER CODE §§ 5.102 and 7.002 authorize the Commission to issue orders and make determinations necessary to effectuate the purposes of the statutes within its jurisdiction.

ORDERING PROVISIONS

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

1. Respondent is assessed an administrative penalty in the amount of one thousand twenty dollars ($1,020.00) for violations of state statutes and rules of the TCEQ. The payment of this penalty and 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 which are not raised here.
2. The penalty assessed by this Order shall be paid within 30 days after the effective date of this Order. All checks submitted to pay the penalty imposed by this Order shall be made out to TCEQ and shall be sent with the notation "Re: Laredo Holdings Investments, LLC; Docket No. 2021-1637-PWS-E" to:

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

3. Respondent shall undertake the following technical requirements:

   a. Within 180 days after the effective date of this Order:

      i. Submit plans and specifications of the public water supply for review and approval, in accordance with 30 TEX. ADMIN. CODE § 290.39. The plans and specifications shall be submitted to:

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

         Respondent shall respond completely and adequately, as determined by TCEQ, to all requests for information concerning plans and specifications within 15 days after the date of such request, or by any other deadline specified by TCEQ in writing.

      ii. Submit well completion data for review and approval of the Facility's public drinking water well, in accordance with 30 TEX. ADMIN. CODE § 290.41. The well completion data shall be submitted to:

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

         Respondent shall respond completely and adequately, as determined by TCEQ, to all requests for information concerning the well completion data within 15 days after the date of such request, or by any other deadline specified by TCEQ in writing.

   b. Within 195 days after the effective date of this Order, submit written certification, in accordance with Ordering Provision No. 3.e., to demonstrate compliance with Ordering Provision Nos. 3.a.i. and 3.a.ii.

   c. Within 270 days after the effective date of this Order:

      i. Obtain approval of the plans and specifications for the public water supply system, in accordance with 30 TEX. ADMIN. CODE § 290.39; and

      ii. Obtain approval of the well completion data for the Facility's public drinking water well, in accordance with 30 TEX. ADMIN. CODE § 290.41.

   d. Within 285 days after the effective date of this Order, submit written certification, in accordance with Ordering Provision No. 3.e., to demonstrate compliance with Ordering Provision Nos. 3.c.i. and 3.c.ii.

   e. The certifications required by these Ordering Provisions shall be accompanied by detailed supporting documentation, including photographs, receipts, and/or other records, shall be signed by 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 fine and imprisonment for knowing violations."

The written certifications and supporting documentation necessary to demonstrate compliance with these Ordering Provisions shall be sent to:

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

and:

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

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

5. The provisions of this Order shall apply to and be binding upon Respondent. Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.

6. 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 Respondent shall be made in writing to the Executive Director. Extensions are not effective until 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.

7. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to Respondent if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions in this Order.

8. 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.

9. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

10. The Chief Clerk shall provide a copy of this fully executed Order to each of the parties. By law, the effective date of this Order shall be the date the Order is final, as provided by 30 TEX. ADMIN. CODE § 70.106(d) and TEX. GOV'T CODE § 2001.144.

S I G N A T U R E P A G E

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

UNSWORN DECLARATION OF PRABHA ERANDI RATNAYAKE

"On behalf of the Executive Director of the Texas Commission on Environmental Quality, the 'Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of Laredo Holdings Investments, LLC' (the "EDPRP") was filed in the TCEQ Chief Clerk's office on April 27, 2023.

The EDPRP was mailed to Respondent's last known address on April 27, 2023, via certified mail, return receipt requested, postage prepaid. According to the return receipt 'green card,' Respondent received notice of the EDPRP on April 29, 2023, as evidenced by the signature on the card.

More than 20 days have elapsed since Respondent received notice of the EDPRP. Respondent failed to file an answer and failed to request a hearing."

"My name is Prabha Erandi Ratnayake and I am an employee of the following governmental agency: Texas Commission on Environmental Quality. I am executing this declaration as part of my assigned duties and responsibilities. I declare under penalty of perjury that the foregoing is true and correct."

Executed in Travis County,

State of Texas,

on the 7th day of July, 2023

Declarant