#### Executive Summary - Enforcement Matter - Case No. 56019 EAST TEXAS BAPTIST ENCAMPMENT RN101259091 Docket No. 2022-0097-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:** No Location(s) Where Violation(s) Occurred: East Texas Baptist Encampment, located on Farm-to-Market Road 2939, three miles southwest of Newton, Newton, Newton 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:** January 19, 2024 Comments Received: No **Penalty Information** 

Total Penalty Assessed: \$9,150 Amount Deferred for Financial Inability to Pay: \$5,550 Confidential information, which may include financial or medical information, has been provided to the Commission for their consideration. Total Paid to General Revenue: \$100 Total Due to General Revenue: \$3,500 Payment Plan: 35 payments of \$100 each **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: November 12, 2021 Date(s) of NOE(s): January 10, 2022

## Executive Summary - Enforcement Matter - Case No. 56019 EAST TEXAS BAPTIST ENCAMPMENT RN101259091 Docket No. 2022-0097-PWS-E

## **Violation Information**

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

2. Failed to flush all dead-end mains at monthly intervals [30 Tex. ADMIN. CODE § 290.46(l)].

3. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request [30 TEX. ADMIN. CODE § 290.46(f)(2) and (f)(3)(A)(i)(III)].

4. Failed to ensure that the electrical wiring is securely installed in compliance with a local or national electrical code [30 TEX. ADMIN. CODE § 290.46(v)].

5. Failed to ensure that all clearwells, GSTs, standpipes, and elevated storage tanks are painted, disinfected, and maintained in strict accordance with current American Water Works Association ("AWWA") standards [30 TEX. ADMIN. CODE § 290.43(c)(8)].

6. Failed to ensure that the Facility's GST hatch remains locked except during inspections and maintenance [30 TEX. ADMIN. CODE § 290.43(c)(2)].

7. Failed to use an acceptable analytical method for disinfectant analyses [30 Tex. ADMIN CODE § 290.119(b)(7)].

8. Failed to calibrate the Facility's well meter at least once every three years [30 Tex. ADMIN. CODE § 290.46(s)(1) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.b.ii].

9. Failed to maintain an up-to-date chemical and microbiological monitoring plan at each water treatment plant that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the public water system will use to comply with the monitoring requirements [30 TEX. ADMIN. CODE § 290.121(a) and (b) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.b.iii].

10. Failed to keep on file copies of well completion data for as long as the well remains in service [30 Tex. ADMIN. CODE § 290.46(n)(3) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.h.i].

11. Failed to obtain approval prior to making any significant change or addition to the system's production treatment, storage, pressure maintenance, or distribution facilities [30 TEX. ADMIN. CODE § 290.39(e)(1) and (h)(1) and TEX. HEALTH & SAFETY CODE § 341.035(a) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision Nos. 2.h.ii. and 2.j].

# Executive Summary – Enforcement Matter – Case No. 56019 EAST TEXAS BAPTIST ENCAMPMENT RN101259091 Docket No. 2022-0097-PWS-E

12. Failed to verify the accuracy of the manual disinfectant residual analyzer at least once every 90 days using chlorine solutions of known concentrations [30 TEX. ADMIN. CODE § 290.46(s)(2)(C)(i) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.b.vi].

# **Corrective Actions/Technical Requirements**

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

N/A

# **Technical Requirements:**

The Order will require the Respondent to:

a. Within 30 days:

i. Conduct the inspection of the Facility's GST;

ii. Modify the flushing program and update the Facility's operational guidance to ensure that all dead-end mains are flushed if water quality complaints are received from water customers or if disinfectant residuals fall below acceptable levels;

iii. Compile and maintain properly completed water works operation and maintenance records, including but not limited to records of the amount of each chemical used each week;

iv. Secure the electrical wiring in compliance with a local or national code for the chemical pump;

v. Update the Facility's operational guidance and conduct employee training to ensure that the acceptable method used to collect the disinfectant residuals is being utilized;

vi. Calibrate the Facility's well meter; and

vii. Verify the accuracy of the manual disinfectant residual analyzer once every 90 days using chlorine solutions of known concentrations.

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

c. Within 60 days:

i. Provide a lock for the GST's roof hatch and ensure the roof hatch remains locked except during inspections and maintenance; and

# Executive Summary - Enforcement Matter - Case No. 56019 EAST TEXAS BAPTIST ENCAMPMENT RN101259091 Docket No. 2022-0097-PWS-E

ii. Maintain a copy of an up-to-date chemical and microbiological monitoring plan at each water treatment plant.

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

e. Within 90 days, keep on file copies of well completion data for the well.

f. Within 105 days, submit written certification to demonstrate compliance with e.

g. Within 180 days:

i. Repaint the ground storage tank's exterior in strict accordance with AWWA standards; and

ii. Submit plans and specifications of the public water supply for review and approval for the significant changes or additions to the system's production, treatment, storage, pressure maintenance, or distribution facilities, including the as-built plans and specifications for the existing service pump.

h. Within 270 days, obtain approval of the plans and specifications for the service pump.

i. Within 285 days, submit written certification to demonstrate compliance with h.

## **Contact Information**

TCEQ Attorney: N/A TCEQ Enforcement Coordinator: Epifanio Villarreal, Enforcement Division, Enforcement Team 4, MC R-14, (361) 881-6991; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548 **Respondent:** Tim Sawyer, President, EAST TEXAS BAPTIST ENCAMPMENT, 178 Private Road 7005, Newton, Texas 75966 Wesley R. Smith, Executive Director, EAST TEXAS BAPTIST ENCAMPMENT, 178 Private Road 7005, Newton, Texas 75966 **Respondent's Attorney:** N/A

South Southern Southe	Policy Revi	Pe ision 5 (January 28, 2	nalty Cal	culatio	n Worksh	ieet (PC		vision February	11, 2021
DATES		18-Jan-2022 20-Jan-2022	Screening 20	-1an-2022	EPA Due				
PESDO		TY INFORMATIC	-						
	Respondent	EAST TEXAS BAP		NT (PCW N	o. 1 <u>)</u>				
	g. Ent. Ref. No. ty/Site Region				Major/M	inor Source	Minor		
CASE I	NFORMATION						<u>.</u>		
	f./Case ID No.		_		No. o	f Violations			
Med		2022-0097-PWS- Public Water Sup			Government	Order Type /Non-Profit			
	Multi-Media		• •		Enf.		Epifanio Villarr Enforcement T		
Adı	min. Penalty \$ I	Limit Minimum	\$50 <b>Ma</b>	ximum	\$1,000			eann 4	
			Penalty	Calcula	tion Sectio	on			
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation bas	se penalt	ties)		Subtotal 1		\$150
ADJU	STMENTS (+	/-) TO SUBTO	TAL 1						
	Subtotals 2-7 are ob Compliance His	tained by multiplying	the Total Base Pena	lty (Subtotal 1 <b>20.0%</b>	) by the indicated pe Adjustment		tals 2, 3, & 7		\$30
			t for one agreed		5				<b>430</b>
	Notes	Linancemen	t for one agreed		inning a denial of	nability.			
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Res	spondent does n	ot meet the	culpability crite	ria.			
	Cood Faith Eff	out to Comply T		<b>4</b>			Subtotal 5		<b>*</b> 0
	Good Faith End	ort to Comply To	otal Adjustmen	ts			Subtotal 5		\$0
	Economic Bene	efit _		0.0%	Enhancement*		Subtotal 6		\$0
	Estimated	Total EB Amounts Cost of Compliance	\$103 \$92	*Capped	d at the Total EB \$ A	mount			
SUM (	OF SUBTOTAI	LS 1-7				F	inal Subtotal		\$180
OTHE	R FACTORS A	S JUSTICE M	AY REOUIRE		0.0%		Adjustment		\$0
		Subtotal by the indic					]		
	Notes								
						Final Pen	alty Amount		\$180
STAT	UTORY LIMIT		Т			Final Asse	ssed Penalty		\$180
DEFE	RRAL				0.0%	Reduction	Adjustment		\$0
		nalty by the indicated	percentage.						T -
	Notes	No d	eferral is recomr	mended for	Findings Orders				
DAVA	BLE PENALT	/							\$180
FATA	DEL PENALI								\$10U

		ing Date 20-Jan-2022 <b>Docket No.</b> 2022-0097-PWS-E			PCW
		pondent EAST TEXAS BAPTIST ENCAMPMENT (PCW No. 1) TE ID No. 56019		sion 5 (Januar	
Rec		ence No. RN101259091	PCW R	evision Februa	ry 11, 2021
		Media Public Water Supply			
	Enf. Coo	rdinator Epifanio Villarreal			
		Compliance History Worksheet			
>> Co	ompliance Histo Component	ory Site Enhancement (Subtotal 2) Number of	Number	Adjust.	
		Written notices of violation ("NOVs") with same or similar violations as those in the			
	NOVs	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		0%	
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%	
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%	
	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%	
	Audits	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%	
	other	Participation in a voluntary pollution reduction program	No	0%	
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
		Adjustment Per	rcentage (Sub	ototal 2)	20%
>> Re	epeat Violator (	(Subtotal 3)		_	
	N/A	Adjustment Per	rcentage (Sub	ototal 3) [	0%
>> Co	ompliance Histo	ory Person Classification (Subtotal 7)			
	N/A	Adjustment Per	rcentage (Sub	ototal 7) [	0%
>> Co	ompliance Histo	ory Summary			
	Compliance History Notes	Enhancement for one agreed order containing a denial of liability.			
		Total Compliance History Adjustment Percentage (	Subtotals 2,	3, & 7) [	20%
>> Fina	al Compliance	History Adjustment Final Adjustment Percent	ane *canned	at 100%	20%
			age capped	at 100%	2070

		ening Date				<b>t No.</b> 2022-0097-PWS-E		PCW
		•	EAST TEXAS BAP	TIST ENCAMP	MENT (PCW No	o. 1)		Revision 5 (January 28, 2021)
Rea		Case ID No.	56019 RN101259091				PCV	<i>V Revision February 11, 2021</i>
Keg.	Lift. Kei		Public Water Sup	vla				
	Enf. C		Epifanio Villarrea					
	Viola	ation Number	1					1
		Rule Cite(s)	30 Tex. Admin	-		and TCEQ Agreed Order Do g Provision No. 2.b.vi	cket No.	
	Violatio	n Description	-			disinfectant residual analyze utions of known concentration		
						Bas	e Penalty	\$1,000
>> En\	vironme	ntal, Prope	rty and Huma	n Health M Harm	atrix			
		Release		Moderate	Minor			
OR		Actual Potential		N N		Percent 5.0%	1	
		Fotential		X		Fercent 5.0%		
>>Prog	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor	Percent 0.0%		
		Failure to veri	fy the accuracy of	f the manual di	isinfectant res	idual analyzer could result i	n the non-	
	Matrix Notes	detection of ir	nproperly disinfed	ted water and	potentially ex	pose persons served by the ed levels protective of hum	Facility to	
						Adjustment	\$950	
								+F0
								\$50
Violatio	on Event	ts						
		Number of \	/iolation Events	1		67 Number of violation	days	
							, .	
			daily weekly					
			monthly					
			quarterly semiannual	X		Violation Bas	e Penalty	\$50
			annual					
			single event					
		One quarter	-			effective date of TCEQ Agro	eed Order	
Good E	aith Eff	orte to Com	ply	0.0%			Poduction	\$0
GUUU F		orts to Com			OE/NOV to EDPRP	?/Settlement Offer	Reduction	\$U
			Extraordinary					
			Ordinary					
			N/A	<u> </u>				
			Notes	The Responde	nt does not m for this vi	eet the good faith criteria olation.		
						Violatior	n Subtotal	\$50
Econor	nic Bene	efit (EB) for	this violatio	n		Statutory Limi	t Test	
		Estimate	ed EB Amount		\$7	Violation Final Pen	alty Total	\$60
			_	This violati	on Final Acce	essed Penalty (adjusted f	or limite)	\$60
						looca i charty (aujusteu i	5	 

	E	conomic	Benefit	Woi	ksheet		
	EAST TEXAS B	SAPTIST ENCAMPN					
Case ID No.							
leg. Ent. Reference No.							
Media Violation No.	Public Water S 1	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							
Equipment				0.00	\$0	\$0	\$0
Buildings		<u> </u>		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
<b>Record Keeping System</b>				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
<b>Remediation/Disposal</b>				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$5	25-Jun-2019	1-Dec-2023	4.44	\$1	n/a	\$1
Notes for DELAYED costs	residual analy	zers at least once	every 90 days	using cl	nlorine solutions of et No. 2018-0537-	ccuracy of the manu f known concentrati PWS-E to the estim	ons, calculated
Avoided Costs	ANNUA	LIZE avoided co	osts before en	tering	item (except for	one-time avoide	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	\$5	25-Jun-2019	20-Jan-2022	2.58	\$1	\$5	\$6
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs	residual analy	zers at least once	every 90 days	using cl	nlorine solutions of	ccuracy of the man f known concentrati PWS-E to the date o	ons, calculated
			-				

	Scre	ening Date	20-Jan-2022		Do	cket No. 2022-00	97-PWS-E		PCW
			EAST TEXAS B	APTIST ENCA	MPMENT (PC)	W No. 1)	Policy	Revision 5 (Ja	nuary 28, 2021)
		Case ID No.					P	CW Revision Fe	bruary 11, 2021
Reg.	Ent. Ref	erence No.	RN101259091						
_		Media	Public Water Su	upply					
	Enf. C	oordinator	Epifanio Villarre	eal					
	Viola	ation Number							
		Rule Cite(s)		30 Tex	. Admin. Cod	e § 290.46(m)(1)(A)			
	Violatio	n Description			inspected by	orage tank ("GST") a May 19, 2018 and ag ot inspected.			
							Base Penalt	y	\$1,000
>> Env	vironme	ntal, Prope	rty and Hun	nan Health	Matrix				
			_	Harm					
OR		<b>Release</b> Actual		Moderate	Minor				
UN		Potential		x		Percent	5.0%		
					I <u></u> I				
>>Pro	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor				
						Percent	0.0%		
	Matrix Notes	expose pers		•	-	amount of contaminar human health. Adjustment		0	
									\$50
	_	-							
Violatio	on Even		/iolation Events	2	] [	69 Number	of violation days		
			daily weekly monthly quarterly semiannual annual single event			Vio	lation Base Penalt	: <b>y</b>	\$100
				Two single e	vents are rec	commended.			
Good F	aith Eff	orts to Com	ply	0.0%			Reductio	n	\$0
						DPRP/Settlement Offer			
			Extraordinary						
			Ordinary						
			N/A	X			]		
			Notes	The Respond		meet the good faith o violation.	criteria for		
							Violation Subtota		£100
								ai	\$100

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$96 Violation Final Penalty Total \$120
	This violation Final Assessed Penalty (adjusted for limits) \$120

	E	conomic	Benefit	Woi	rksheet		
Respondent	EAST TEXAS E	APTIST ENCAMPN	IENT (PCW No.	1)			
Case ID No.				-,			
eg. Ent. Reference No.							
							Years of
	Public Water S	ырру				<b>Percent Interest</b>	
Violation No.	. Z						Depreciation
						5.0	1
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		•					
	1						
Delayed Casta							
Delayed Costs Equipment	·			0.00	\$0	\$0	\$0
Buildinas				0.00	\$0	\$0	<u>\$0</u> \$0
Other (as needed)		<mark>╬─────</mark> ┟		0.00	\$0	\$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0	\$0	<u>\$0</u> \$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	<u>\$0</u>
Training/Sampling		i i i i i i i i i i i i i i i i i i i		0.00	\$0	n/a	<u>\$0</u>
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)						1 -	
other (as needed)	The delayed			0.00	\$0	n/a	\$0
Notes for DELAYED costs		Economic	c Benefit Worksl	unt to c neet for	onduct the annual Violation No. 1 of	GST inspection is c PCW No. 2.	aptured in the
Notes for DELAYED costs Avoided Costs		Economic	c Benefit Worksl	unt to c neet for <b>tering</b>	onduct the annual Violation No. 1 of item (except for	GST inspection is c PCW No. 2.	aptured in the
Notes for DELAYED costs Avoided Costs Disposal		Economic	c Benefit Worksl	unt to c neet for <b>tering</b> 0.00	onduct the annual Violation No. 1 of item (except for \$0	GST inspection is c PCW No. 2.	aptured in the d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel		Economic	c Benefit Worksl	tering	onduct the annual Violation No. 1 of item (except for \$0 \$0	GST inspection is c PCW No. 2. one-time avoide \$0 \$0	aptured in the d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling		Economic	c Benefit Worksl	unt to c neet for tering 0.00 0.00 0.00	onduct the annual Violation No. 1 of item (except for \$0 \$0 \$0	GST inspection is c PCW No. 2. one-time avoided \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment		Economic	c Benefit Worksl	unt to c peet for tering 0.00 0.00 0.00 0.00	onduct the annual Violation No. 1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0	GST inspection is c PCW No. 2. one-time avoide \$0 \$0 \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNUA	Economic	c Benefit Worksl osts before en	tering 0.00 0.00 0.00 0.00 0.00 0.00	onduct the annual Violation No. 1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	GST inspection is c PCW No. 2. one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	<b>ANNU</b> <b>ANNU</b> <b>ANNU</b> <b>S</b> <b>ANNU</b>	Economic ALIZE avoided co ALIZE avoided co ALIZE avoided co Control co Cont	c Benefit Worksl osts before en 20-Jan-2022	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 3.68	onduct the annual Violation No. 1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	GST inspection is c PCW No. 2. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNUA	Economic	c Benefit Worksl osts before en 20-Jan-2022	tering 0.00 0.00 0.00 0.00 0.00 0.00	onduct the annual Violation No. 1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	GST inspection is c PCW No. 2. one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	ANNUA \$41 \$41 The avoided	Economic ALIZE avoided co Internet and Internet and Inter	20-Jan-2022 20-Jan-2022 20-Jan-2022 estimated amou 22 MG tank (\$4	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	onduct the annual Violation No. 1 of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	GST inspection is c PCW No. 2. one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	aptured in the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$49 \$47 t includes the

Penalty Calculation Worksheet (PCW) Policy Revision 5 (January 28, 2021) PCW Revision Februa	ary 11, 2021
DATESAssigned18-Jan-2022PCW20-Jan-2022Screening20-Jan-2022EPA Due	
RESPONDENT/FACILITY INFORMATION	
Respondent EAST TEXAS BAPTIST ENCAMPMENT (PCW No. 2)	
Reg. Ent. Ref. No. RN101259091         Facility/Site Region 10-Beaumont       Major/Minor Source Minor	
CASE INFORMATION Enf./Case ID No. 56019 No. of Violations 12	
Docket No. 2022-0097-PWS-E Order Type Findings	
Media Program(s)       Public Water Supply       Government/Non-Profit       Yes         Multi-Media       Enf. Coordinator       Epifanio Villarreal	_
Admin. Penalty \$ Limit Minimum \$50 Maximum \$5,000	
Penalty Calculation Section	
TOTAL BASE PENALTY (Sum of violation base penalties)       Subtotal 1	\$7,475
ADJUSTMENTS (+/-) TO SUBTOTAL 1	
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. Compliance History 20.0% Adjustment Subtotals 2, 3, & 7	\$1,495
Notes Enhancement for one agreed order containing a denial of liability.	
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       \$2,330       *Capped at the Total EB \$ Amount         Estimated Cost of Compliance       \$11,005	<u> </u>
SUM OF SUBTOTALS 1-7     Final Subtotal	\$8,970
OTHER FACTORS AS JUSTICE MAY REQUIRE 0.0% Adjustment	\$0
Reduces or enhances the Final Subtotal by the indicated percentage.	
Notes	
Final Penalty Amount	\$8,970
STATUTORY LIMIT ADJUSTMENT       Final Assessed Penalty	\$8,970
DEFERRAL 0.0% Reduction Adjustment	\$0
Reduces the Final Assessed Penalty by the indicated percentage.	
Notes No deferral is recommended for Findings Orders.	
	\$8,970

	Screen	ing Date 20-Jan-2022 <b>Docket No.</b> 2022-0097-PWS-E			PCW
		Pondent EAST TEXAS BAPTIST ENCAMPMENT (PCW No. 2)		sion 5 (January 2	
Reg		e ID No. 56019 ence No. RN101259091	PCW Re	evision February	11, 2021
Reg		Media Public Water Supply			
	Enf. Coc	erdinator Epifanio Villarreal			
		Compliance History Worksheet			
>> Co	mpliance Histo Component	bry <i>Site</i> Enhancement (Subtotal 2) Number of	Number	Adjuct	
	Component	Written notices of violation ("NOVs") with same or similar violations as those in the		Adjust.	
	NOVs	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> )	1	20%	
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0%	
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%	
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%	
	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 (number of audits for which notices were submitted)	0	0%	
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%	
		Environmental management systems in place for one year or more	No	0%	
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
	Other	Participation in a voluntary pollution reduction program	No	0%	
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
		Adjustment Per	rcentage (Sub	ototal 2)	20%
>> Re	epeat Violator (	(Subtotal 3)			
	N/A	Adjustment Per	rcentage (Sub	ototal 3)	0%
>> Co	mpliance Histo	ory Person Classification (Subtotal 7)			
	N/A	Adjustment Per	rcentage (Sub	ototal 7)	0%
>> Co	mpliance Histo	ory Summary			
	Compliance History Notes	Enhancement for one agreed order containing a denial of liability.			
		Total Compliance History Adjustment Percentage (	Subtotals 2,	3, & 7)	20%
>> Fina	al Compliance	History Adjustment Final Adjustment Percent	ane *canned	at 100%	20%
			age capped		2070

	Screening Date	20-Jan-2022 EAST TEXAS BAPTIST EN		<b>ket No.</b> 2022-0097-PWS-E	De lieux Des sie	PCW
	Case ID No.			NO. 2)		ion 5 (January 28, 2021) vision February 11, 2021
Reg.	Ent. Reference No.					
	Media Enf. Coordinator	Public Water Supply				
	Violation Number					
	Rule Cite(s)		Tax Admin Code	5,200,46(m)(1)(4)		
		30	Tex. Admin. Code	g 290.46(m)(1)(A)		
	Violation Description			age tank ("GST") annually. Spec ay 19, 2020 and again by May 1 inspected.		
				Base	Penalty	\$5,000
>> Env	vironmental, Proper	ty and Human Hea	Ith Matrix			
	Release	Harn Major Modera				
OR	Actual					
	Potential	X		Percent 5.0%		
>>Prog	grammatic Matrix					
	Falsification	Major Modera	ate Minor	Percent 0.0%		
				se non-detection of defects and		
	Notes expose pers		els protective of hu	ount of contaminants which wou man health.	uld not	
			·			
				Adjustment	\$4,750	
						\$250
Violatio	on Events					
	Number of	Violation Events		872 Number of violation da	ays	
		daily weekly monthly		Violation Page	Donalty	\$500
		quarterly semiannual annual single event <u>x</u>		Violation Base	Penalty	\$500
		Two sing	gle events are recon	nmended.		
Good F	aith Efforts to Com		.0%		eduction	\$0
		Before NOE, Extraordinary	/NOV NOE/NOV to EDP	RP/Settlement Offer		
		Ordinary				
		N/A x				
		Notes The Res		eet the good faith criteria for olation.		
				Violation S	Subtotal	\$500
Econor	nic Benefit (EB) for	this violation		Statutory Limit T	ſest	
	Estimat	ed EB Amount	\$90	Violation Final Penal	lty Total	\$600
		This	violation Final As	ssessed Penalty (adjusted for	r limits)	\$600
					·	1

	E	conomic	Benefit	Wo	rksheet		
Respondent		BAPTIST ENCAMPN					
Case ID No.				_)			
eg. Ent. Reference No.							Versef
	Public Water S	ырріу				<b>Percent Interest</b>	Years of
Violation No.	1						Depreciation
						5.0	1
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description				_			
Delayed Conto							
Delayed Costs	Ir					+0	<b>*</b> 0
Equipment		<u>  </u>		0.00	\$0 ¢0	\$0 \$0	\$0
Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed) Engineering/Construction				0.00	\$0	\$0	<u>\$0</u> \$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	<u> </u>
Training/Sampling				0.00	\$0	n/a	<u> </u>
Remediation/Disposal				0.00	\$0	n/a	<u> </u>
Permit Costs				0.00	\$0	n/a	<u>\$0</u>
Other (as needed)	\$41	12-Nov-2021	1-Dec-2023	2.05	\$4	n/a	<u>\$0</u> \$4
Notes for DELAYED costs	exterior and i	nterior of the 0.02	22 MG tank is ca date	lculated e of cor	d from the date of mpliance.	GST inspection tha the investigation to	the estimated
Avoided Costs	ANNUA		osts before en			one-time avoide	-
Disposal Personnel		<u> </u>		0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
nspection/Reporting/Sampling				0.00	\$0	\$0 \$0	<u>\$0</u> \$0
Supplies/Equipment				0.00	\$0	\$0	<u> </u>
Financial Assurance		<u> </u>		0.00	\$0	\$0	<u> </u>
ONE-TIME avoided costs	\$41	19-May-2020	20-Jan-2022	1.67	\$3	\$41	\$44
Other (as needed)	\$41	19-May-2020	20-Jan-2022	0.67	\$1	\$41	\$42
					· · · · ·	GST inspection tha	
Notes for AVOIDED costs			• ·	1 per y	ear), calculated fro reening.	om the inspection d	

	Scre	ening Date	20-Jan-2022		Do	cket No. 2022-0097	-PWS-E		PCW
		-	EAST TEXAS B	APTIST ENCAN	MPMENT (PCV	V No. 2)	Policy F	Revision 5 (J	January 28, 2021)
_		ase ID No.					PCV	N Revision F	Eebruary 11, 2021
Reg.	Ent. Ref		RN101259091						
	Enf C		Public Water Su						
		oordinator	Epifanio Villarre	ear					
	VIOIC	Rule Cite(s)		20	Taun Adamia			1	
				30	Tex. Admin.	Code § 290.46(I)			
	Violatio	n Description	recorded the	date and time	when flushin	thly intervals. Specifical g was conducted. Howe ed were not being reco	ever, the locations		
							Base Penalty		\$5,000
>> Env	vironme	ntal, Prope	rty and Hun	nan Health	Matrix				
		Delesse	Majar	Harm	Minor				
OR		<b>Release</b> Actual		Moderate	Minor				
-		Potential			X	Percent	3.0%		
>>Pro	gramma	tic Matrix Falsification	Major	Moderate	Minor				
				Hoderate		Percent	0.0%		
								7	
	Matrix Notes			mount of cont		als could expose person ich would not exceed le			
						Adjustment	\$4,850	]	
									\$150
Violatio	on Even	ts							
Totaci			/iolation Events	1		69 Number of	violation days		
			daily						
			weekly monthly						
			quarterly			Viola	tion Base Penalty	,	\$150
			semiannual					<u></u>	
			annual single event	X					
			Single event	^				ז	
				One single	event is reco	mmended.			
Good E	aith Eff	orts to Com	nhy	0.0%			Reduction	1 	\$0
		orts to Com				OPRP/Settlement Offer	Reduction	L	<b>.</b>
			Extraordinary						
			Ordinary						
			N/A	X					
			Notes	The Respond		meet the good faith cri violation.	teria for		
						N	/iolation Subtotal		\$150

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$21 Violation Final Penalty Total \$180
	This violation Final Assessed Penalty (adjusted for limits) \$180

	E	conomic	Benefit	Wo	rksheet		
Respondent	EAST TEXAS E	BAPTIST ENCAMPM	1ENT (PCW No.	2)			
Case ID No.				_,			
eg. Ent. Reference No.							
-							Years of
	Public Water S	supply				<b>Percent Interest</b>	Depreciation
Violation No.	Z						
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment	1			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u>
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
<b>Record Keeping System</b>				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)	\$200	12-Nov-2021	1-Dec-2023	2.05	\$21	n/a	\$21
Notes for DELAYED costs	,	of the	investigation to	the est	timated date of co	•	
Avoided Costs	ANNU	ALIZE avoided co	osts before en			one-time avoide	-
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs		1		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

	Screenin	<b>g Date</b> 20-Jan-2022	Do	cket No. 2022-0097-PWS-E		PCW
	Resp	ondent EAST TEXAS B	BAPTIST ENCAMPMENT (PCW	/ No. 2)	Policy R	evision 5 (January 28, 2021)
	Case	<b>ID No.</b> 56019			РСИ	Revision February 11, 2021
Reg.	Ent. Referen	<b>ICE NO.</b> RN101259091				
		Media Public Water S	,			
		<b>linator</b> Epifanio Villarr	eal			
	Violation Rule	Cite(s)				
			30 Tex. Admin. Code § 290.4	46(f)(2) and (f)(3)(A)(i)(III)		
	Violation Des	readily avail	able for review by the Execu	and maintenance records and n tive Director upon request. Spe used each week were not maint review.	ecifically,	
				Bas	e Penalty	\$5,000
>> Env	/ironmental,	, Property and Hur	man Health Matrix			
		Release Major	<b>Harm</b> Moderate Minor			
OR		Actual				
		Potential	<u>j                                    </u>	Percent 0.0%		
		A - twise				
>>Proč	grammatic N Fals	<b>Hatrix</b> sification Major	Moderate Minor			
			X	Percent 1.0%		
	Matrix Notes	At le	east 70% of the rule require	ments were met.		
				Adjustment	\$4,950	
					1	\$50
Violatio	on Events					
	Nu	mber of Violation Events		69 Number of violation	davs	
	114				uuyo	
		daily				
		weekly monthly				
		quarterly		Violation Bas	e Penalty	\$50
		semiannual				
		annual single event				
		single event	<b>X</b>			
			One single event is recor	nmended.		
			One single event is recor	nmended.		
Good F	aith Efforts	to Comply	One single event is recor	nmended.	Reduction	\$0
Good F	aith Efforts		0.0% Before NOE/NOV NOE/NOV to ED		Reduction	\$0
Good F	aith Efforts	Extraordinary	0.0% Before NOE/NOV NOE/NOV to ED		Reduction	\$0
Good F	aith Efforts	Extraordinary Ordinary	0.0% Before NOE/NOV NOE/NOV to ED		Reduction	\$0
Good F	aith Efforts	Extraordinary	0.0% Before NOE/NOV NOE/NOV to ED	PRP/Settlement Offer	Reduction	\$0
Good F	aith Efforts	Extraordinary Ordinary	0.0% Before NOE/NOV NOE/NOV to ED	PRP/Settlement Offer	Reduction	\$0
Good F	aith Efforts	Extraordinary Ordinary N/A	0.0% Before NOE/NOV NOE/NOV to ED	PRP/Settlement Offer	Reduction	\$0
Good F	aith Efforts	Extraordinary Ordinary N/A	0.0% Before NOE/NOV NOE/NOV to ED	PRP/Settlement Offer meet the good faith criteria for violation.	Reduction	\$0

Economic Benefit (EB) for this violation	n Statutory Limit Test	
Estimated EB Amount	\$5 Violation Final Penalty Total	\$60
	This violation Final Assessed Penalty (adjusted for limits)	\$60

	E	conomic	Benefit	Woi	rksheet		
Respondent	EAST TEXAS E	BAPTIST ENCAMPM	IENT (PCW No.	2)			
Case ID No.				_)			
leg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		որին				<b>Percent Interest</b>	Depreciation
violation No.	3						
						5.0	1
	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
<b>Record Keeping System</b>	\$45	12-Nov-2021	1-Dec-2023	2.05	\$5	n/a	\$5
Training/Sampling	-			0.00	\$0	n/a	\$0
Remediation/Disposal	-			0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	records an	d make them imm	ediately availat	ole for ir	nspection upon rec	tem operation and Juest by the Executi d date of compliance	ve Director,
Avoided Costs	ANNU	ALIZE avoided co	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

	—	Date 20-Jan-2022	<b>Docket No.</b> 2022-0097-PWS-E	PCW
	Respon	dent EAST TEXAS B	BAPTIST ENCAMPMENT (PCW No. 2) Pol	cy Revision 5 (January 28, 2021)
	Case II	<b>D No.</b> 56019		PCW Revision February 11, 2021
Reg.	Ent. Reference	<b>e No.</b> RN101259091		
	Μ	ledia Public Water S	עומסט	
		nator Epifanio Villarro		
	Violation Nu	· · ·	1	
	Rule C			
			30 Tex. Admin. Code § 290.46(v)	
	Violation Descr	<b>iption</b> local or na	ure that the electrical wiring is securely installed in compliance with tional electrical code. Specifically, the wiring was exposed on the cal pump for the polyphosphate located in the chemical room.	a
			Base Pena	<b>Ity</b> \$5,000
>> EU/	vironmental, P	roperty and Hun	nan Health Matrix Harm	
	Re	elease Major	Moderate Minor	
OR		Actual		
	Pc	otential x	Percent 15.0%	
>>Prog	grammatic Ma		Madavata	
	Falsific	cation Major	Moderate Minor Percent 0.0%	
	Failu	re to ensure all electric	cal wiring is installed in compliance with a local or national electrica	
			vees or persons served by the Facility to contaminants which would	
	Notes		exceed levels protective of human health.	
			Adjustment \$4,2	250
			Adjustment \$4,2	
			Adjustment \$4,2	
Violatio	on Events		Adjustment \$4,2	
Violatio				
Violatio		ber of Violation Events		
Violatio				
Violatio		daily		
Violatio		daily weekly	3 69 Number of violation days	
Violatio		daily		\$750
Violatio		daily weekly monthly	3 69 Number of violation days	\$750
Violatio		daily weekly monthly quarterly semiannual annual	3 69 Number of violation days	\$750
Violatio		daily weekly monthly quarterly semiannual	3 69 Number of violation days	\$750
Violatio		daily weekly monthly quarterly semiannual annual	3 69 Number of violation days	\$750
Violatio	Num	daily weekly monthly quarterly semiannual annual single event monthly events are re	3     69 Number of violation days     X     Violation Base Pena     Commended, calculated from the date of the investigation, Novem	\$750
Violatio	Num	daily weekly monthly quarterly semiannual annual single event monthly events are re	3     69 Number of violation days     x     Violation Base Pena	\$750
	Numl	daily weekly monthly quarterly semiannual annual single event monthly events are re 12, 202	3     69 Number of violation days     X     Violation Base Pena     Commended, calculated from the date of the investigation, Novem	\$750 Ity \$2,250
	Num	daily weekly monthly quarterly semiannual annual single event monthly events are re 12, 202	3       69       Number of violation days         x       Violation Base Pena         commended, calculated from the date of the investigation, Novem         commended, calculated from the date of the investigation, Novem         1, to the date of screening, January 20, 2022.         0.0%	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event 12, 202	3       69       Number of violation days         x       Violation Base Pena         violation Base Pena       Seconmended, calculated from the date of the investigation, Novem         ccommended, calculated from the date of the investigation, Novem       Reduct         0.0%       NOE/NOV to EDPRP/Settlement Offer	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event monthly events are re 12, 202	3       69       Number of violation days         x       Violation Base Pena         violation Base Pena       Violation Base Pena         ecommended, calculated from the date of the investigation, Novem       21, to the date of screening, January 20, 2022.         0.0%       Reduct         Before NOE/NOV       NOE/NOV to EDPRP/Settlement Offer	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event monthly events are re 12, 202 <b>Comply</b> Extraordinary Ordinary	3       69       Number of violation days         x       Violation Base Pena         violation Base Pena       Violation Base Pena         ecommended, calculated from the date of the investigation, Novem 21, to the date of screening, January 20, 2022.       Reduct         0.0%       Reduct         Before NOE/NOV       NOE/NOV to EDPRP/Settlement Offer	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event monthly events are re 12, 202	3       69       Number of violation days         x       Violation Base Pena         violation Base Pena       Violation Base Pena         ecommended, calculated from the date of the investigation, Novem 21, to the date of screening, January 20, 2022.       Reduct         0.0%       Reduct         Before NOE/NOV       NOE/NOV to EDPRP/Settlement Offer	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event 12, 202 <b>Comply</b> Extraordinary Ordinary N/A	3     69 Number of violation days     X     Violation Base Pena     Violation Base Pena     Commended, calculated from the date of the investigation, Novem 21, to the date of screening, January 20, 2022.     O.0%     Reduct Before NOE/NOV_NOE/NOV to EDPRP/Settlement Offer     X  The Respondent does not meet the good faith criteria for	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event monthly events are re 12, 202 <b>Comply</b> Extraordinary Ordinary	3     69 Number of violation days     X     Violation Base Pena     Violation Base Pena     Commended, calculated from the date of the investigation, Novem 21, to the date of screening, January 20, 2022.     O.0%     Reduct Before NOE/NOV_NOE/NOV to EDPRP/Settlement Offer     X  The Respondent does not meet the good faith criteria for	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event 12, 202 <b>Comply</b> Extraordinary Ordinary N/A	3 69   Number of violation days   x   Violation Base Pena    commended, calculated from the date of the investigation, Novem 21, to the date of screening, January 20, 2022.   0.0%   Reduct Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer    The Respondent does not meet the good faith criteria for	\$750 Ity \$2,250
	Numl	daily weekly monthly quarterly semiannual annual single event 12, 202 <b>Comply</b> Extraordinary Ordinary N/A	3 69   Number of violation days   x   Violation Base Pena    commended, calculated from the date of the investigation, Novem 21, to the date of screening, January 20, 2022.   0.0%   Reduct Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer    The Respondent does not meet the good faith criteria for	\$750 Ity \$2,250 or \$0

Economic Benefit (EB) for this violation	n Statutory Limit Test
Estimated EB Amount	\$28 Violation Final Penalty Total \$2,700
	This violation Final Assessed Penalty (adjusted for limits) \$2,700

	E	conomic	Benefit	Wo	rksheet		
Respondent	EAST TEXAS E	BAPTIST ENCAMPM	IENT (PCW No.	2)			
Case ID No.			,	,			
eg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		Jappiy				<b>Percent Interest</b>	Depreciation
	-						
						5.0	1
		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)	\$200	12-Nov-2021	1-Dec-2023	2.05	\$1	\$27	\$28
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
<b>Record Keeping System</b>				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
						water system electr	-
Notes for DELAYED costs						water system electr date of the investig	-
Notes for DELAYED costs			tional electrical	code, c		-	-
	compliance	with a local or na	tional electrical estimate	code, c d date	alculated from the of compliance.	date of the investig	ation to the
Avoided Costs	compliance	with a local or na	tional electrical estimate	code, c d date	alculated from the of compliance.	date of the investig	ation to the
Avoided Costs Disposal	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00	alculated from the of compliance. item (except for \$0	date of the investig	ation to the I costs) \$0
Avoided Costs Disposal Personnel	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0	date of the investig	ation to the I costs) \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0	one-time avoided \$0 \$0 \$0 \$0	ation to the <b>1 costs)</b> \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0	date of the investig	ation to the <b>1 costs)</b> \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ation to the <b>1 costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date of the investig	ation to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ation to the <b>1 costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date of the investig	ation to the <b>1 costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date of the investig	ation to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date of the investig	ation to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	date of the investig	ation to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	compliance	with a local or na	tional electrical estimate	code, c d date tering 0.00 0.00 0.00 0.00 0.00 0.00	alculated from the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ation to the \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	<b>–</b> – – – – –						
	Screening Date				ket No. 2022-00		PCW
		EAST TEXAS BA	APTIST ENCAR	MPMENT (PCW	No. 2)		Revision 5 (January 28, 2021)
	Case ID No.					PCI	N Revision February 11, 2021
Reg.	Ent. Reference No.						
		Public Water Su	,				
	Enf. Coordinator		al				
	Violation Number						7
	Rule Cite(s)		30 Te	ex. Admin. Cod	e § 290.43(c)(8)		
	Violation Description	are painted, dis	sinfected, and	maintained in	strict accordance words. Specifically, th	vated storage tanks vith current American e exterior of the GST	
						Base Penalty	\$5,000
>> Env	vironmental, Prope	rty and Hum	an Health	Matrix			
		_	Harm				
	Release		Moderate	Minor			
OR	Actual				Dorcont	E 00/	
	Potential		Х		Percent	5.0%	
>>Pro	grammatic Matrix						
	Falsification	Major	Moderate	Minor			
					Percent	0.0%	
							-
	Matrix Failure to ens	sure that the GS	T is painted ir	n strict accorda	nce with AWWA sta	ndards could expose	
	Notes persons ser	ved by the Facilit				h would not exceed	
	Notes		levels prote	ective of humar	n health.		
							<u>1</u>
					Adjustment	: \$4,750	
						\$4,750	
						\$4,750	
Violatio	on Events					\$4,750	
Violatio		····· - · · F			Adjustment		
Violatio		/iolation Events	1	]	Adjustment	s4,750	
Violatio			1	]	Adjustment		
Violatio		daily	1		Adjustment		
Violatio			1		Adjustment		
Violatio		daily weekly monthly quarterly	1 		Adjustment		\$250
Violatio		daily weekly monthly quarterly semiannual	1		Adjustment	of violation days	\$250
Violatio		daily weekly monthly quarterly semiannual annual	1		Adjustment	of violation days	\$250
Violatio		daily weekly monthly quarterly semiannual	1		Adjustment	of violation days	\$250
Violatio	Number of N	daily weekly monthly quarterly semiannual annual single event	1 		Adjustment	of violation days	\$250
Violatio	Number of N	daily weekly monthly quarterly semiannual annual single event	1 x nended, calcu	l C	Adjustment 69 Number Vio	of violation days	\$250
Violatio	Number of N	daily weekly monthly quarterly semiannual annual single event	1 x nended, calcu	l C	Adjustment	of violation days	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event	1 x nended, calcu to the date o	l C	Adjustment 69 Number Vio	of violation days Iation Base Penalty	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event event is recomn 2021,	1 x nended, calcu to the date o	llated from the	Adjustment	of violation days	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event	1 x nended, calcu to the date o	llated from the	Adjustment 69 Number Vio	of violation days Iation Base Penalty	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event event is recomn 2021,	1 x nended, calcu to the date o	llated from the	Adjustment	of violation days Iation Base Penalty	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event event is recomn 2021,	1 x nended, calcu to the date o 0.0% efore NOE/NOV	llated from the	Adjustment	of violation days Iation Base Penalty	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event event is recomn 2021, ply Extraordinary Ordinary N/A	1 x nended, calcu to the date o 0.0% efore NOE/NOV	Ilated from the of screening, Ja	Adjustment 69 Number Vio date of the investig nuary 20, 2022.	of violation days lation Base Penalty gation, November 12, Reduction	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event event is recomn 2021, ply Extraordinary Ordinary N/A	1 x nended, calcu to the date o 0.0% efore NOE/NOV	Ilated from the of screening, Ja	Adjustment 69 Number Vio date of the investig nuary 20, 2022.	of violation days lation Base Penalty gation, November 12, Reduction	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event event is recomn 2021, ply Extraordinary Ordinary N/A	1 x nended, calcu to the date o 0.0% efore NOE/NOV	Ilated from the of screening, Ja	Adjustment 69 Number Vio date of the investig nuary 20, 2022.	of violation days lation Base Penalty gation, November 12, Reduction	\$250
	Number of N	daily weekly monthly quarterly semiannual annual single event event is recomn 2021, ply Extraordinary Ordinary N/A	1 x nended, calcu to the date o 0.0% efore NOE/NOV	Ilated from the of screening, Ja	Adjustment 69 Number Vio date of the investig nuary 20, 2022.	of violation days lation Base Penalty gation, November 12, Reduction	\$250 \$250

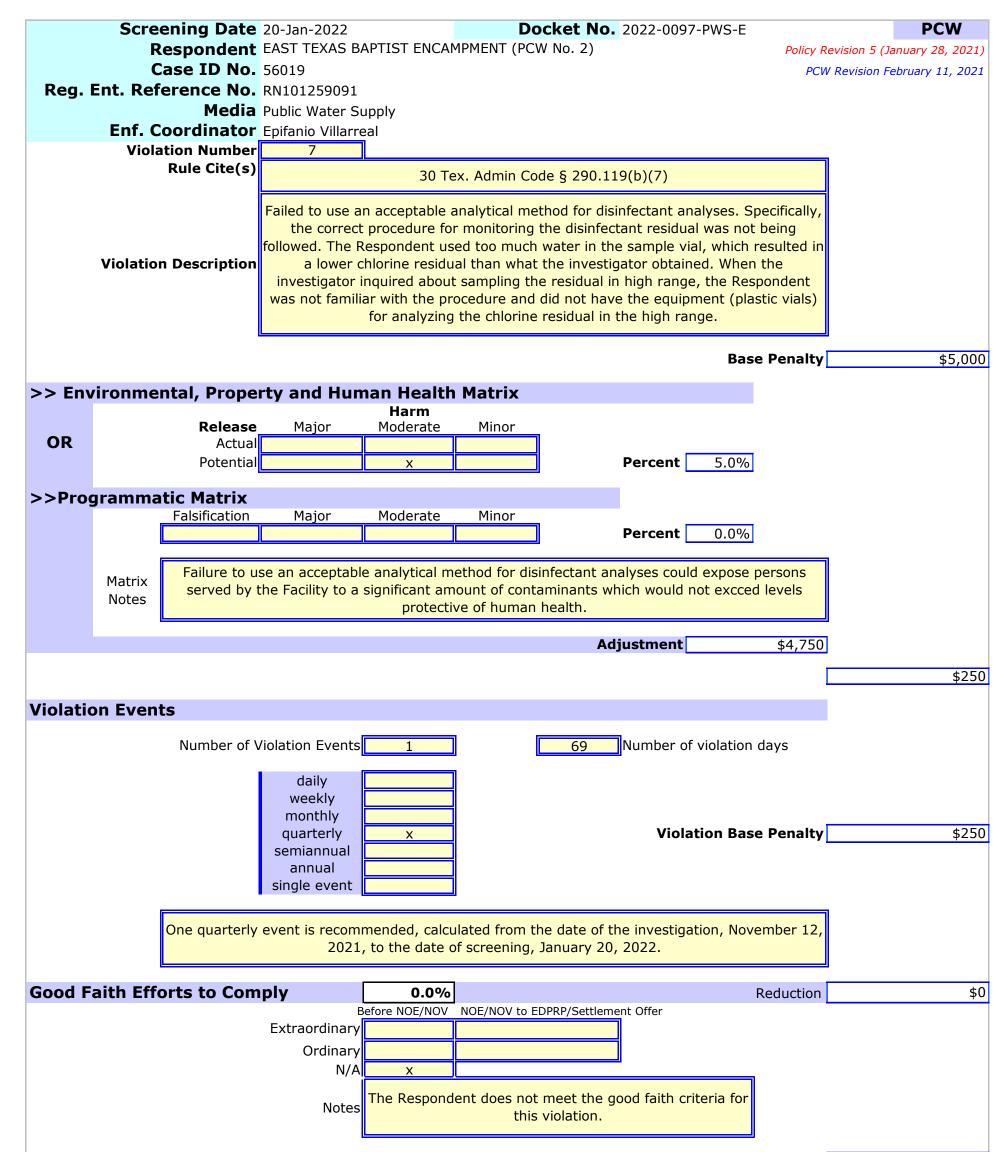
Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$864 Violation Final Penalty Total \$300
	This violation Final Assessed Penalty (adjusted for limits) \$300

	E	conomic	Benefit	Wo	rksheet		
Respondent	EAST TEXAS E	BAPTIST ENCAMPM	IENT (PCW No.	2)			
Case ID No.			(	_,			
eg. Ent. Reference No.							
							Years of
	Public Water S	ырру				<b>Percent Interest</b>	
Violation No.	5						Depreciation
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$5,000	12-Nov-2021	1-May-2024	2.47	\$41	\$823	\$864
<b>Engineering/Construction</b>				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	standa	rds, calculated fro	m the date of t	he inve	stigation to the est	s GST in accordance	pliance.
Avoided Costs	ANNU	ALIZE avoided co	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0 \$0	\$0
Personnel				0.00	\$0 \$0	\$0 ¢0	\$0 ¢0
inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Financial Assurance				0.00	\$0	\$0	<u> </u>
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	<u> </u>
····· (·· ·····)		<u>""</u>		<u></u>	μψυ		<u>\$0</u>
Notes for AVOIDED costs							

Ro		20-Jan-2022			2022-0097-PWS-E		PCW
	-		APTIST ENCA	MPMENT (PCW No. 2)		Policy Rev	ision 5 (January 28, 2021)
Ca	se ID No.	56019				PCW R	evision February 11, 2021
Reg. Ent. Refe	rence No.	RN101259091					
		Public Water Su					
Enf. Co	ordinator	Epifanio Villarre	eal				
Violati	ion Number	6					
F	Rule Cite(s)		30 Te	ex. Admin. Code § 290.4	-3(c)(2)		
Violation	Description				nains locked except durir atch did not have the abi	-	
					Base Pe	enalty	\$5,000
>> Environment	tal, Prope	rty and Hun		Matrix			
	Release	Major	<b>Harm</b> Moderate	Minor			
OR	Actual						
	Potential		X		Percent 5.0%		
>>Programmati				·			
	Falsification	Major	Moderate	Minor			
					Percent 0.0%		
	Failure to er	sure that the r	oof hatch is lo	cked could allow unauth	orized access to the GST	and	
Matrix					o a significant amount of		
Notes				exceed levels protective	-		
				Ad	justment	\$4,750	
							\$250
<b>Violation Events</b>	5					L	\$250
							\$250
					<b>1</b>		\$250
		/iolation Events	1	69	Number of violation day	s	\$250
			1	69	Number of violation day	s	\$250
		/iolation Events daily weekly	1	69	Number of violation day	s	\$250
		daily		69	Number of violation day	s	\$250
		daily weekly monthly quarterly	1	69	Number of violation day Violation Base Pe		
		daily weekly monthly quarterly semiannual		69			
		daily weekly monthly quarterly semiannual annual		69			
		daily weekly monthly quarterly semiannual		69			
	Number of V	daily weekly monthly quarterly semiannual annual single event	X		Violation Base Pe	enalty	
С	Number of V	daily weekly monthly quarterly semiannual annual single event	x mended, calcu	lated from the date of t	Violation Base Pe	enalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event	x mended, calcu		Violation Base Pe	enalty	
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recomin 2021,	x mended, calcu	lated from the date of t	Violation Base Pe he investigation, Novemb , 2022.	enalty	\$250
Good Faith Effor	Number of V	daily weekly monthly quarterly semiannual annual single event event is recomp 2021,	x mended, calcu , to the date c	llated from the date of to of screening, January 20,	Violation Base Pe he investigation, Novemb , 2022. Red	enalty	\$250
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recom 2021,	x mended, calcu , to the date c	lated from the date of t	Violation Base Pe he investigation, Novemb , 2022. Red	enalty	\$250
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recom 2021,	x mended, calcu , to the date c	llated from the date of to of screening, January 20,	Violation Base Pe he investigation, Novemb , 2022. Red	enalty	\$250
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recom 2021, ply Extraordinary Ordinary	x mended, calcu , to the date c 0.0%	llated from the date of to of screening, January 20,	Violation Base Pe he investigation, Novemb , 2022. Red	enalty	\$250
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recom 2021,	mended, calcu , to the date c 0.0% Before NOE/NOV	Ilated from the date of the form the date of the form the date of the form the date of the formation of screening, January 20, NOE/NOV to EDPRP/Settlements	Violation Base Pe	enalty	\$250
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recom 2021, ply Extraordinary Ordinary	mended, calcu , to the date c 0.0% Before NOE/NOV	Ilated from the date of the form the date of the form the date of the form the date of the formation of the	Violation Base Pe	enalty	\$250 \$250 \$0
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recom 2021, ply Extraordinary Ordinary N/A	mended, calcu , to the date c 0.0% Before NOE/NOV	Ilated from the date of the form the date of the form the date of the form the date of the formation of screening, January 20, NOE/NOV to EDPRP/Settlements	Violation Base Pe	enalty	\$250
	Number of V	daily weekly monthly quarterly semiannual annual single event event is recom 2021, ply Extraordinary Ordinary N/A	mended, calcu , to the date c 0.0% Before NOE/NOV	Ilated from the date of the form the date of the form the date of the form the date of the formation of the	Violation Base Pe	enalty	\$250

Economic Benefit (EB) for this violation	n Statutory Limit Test	
Estimated EB Amount	\$5 Violation Final Penalty Total	\$300
	This violation Final Assessed Penalty (adjusted for limits)	\$300

	E	conomic	Benefit	Woi	<b>ksheet</b>		
Respondent	EAST TEXAS E	APTIST ENCAMPM	IENT (PCW No.	2)			
Case ID No.				2			
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		app.)				Percent Interest	Depreciation
	0					5.0	15
	<b>Theorem Const</b>	Data Dansing d		Maria	Tuberra Courd		
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	( <u></u>			-1	<b>I</b>		
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 ¢0	\$0 ¢0	<u>\$0</u>
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	<u> </u>
Training/Sampling				0.00	\$0	n/a	<u>\$0</u> \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$50	12-Nov-2021	1-Jan-2024	2.14	\$5	n/a	\$5
Notes for DELAYED costs					date of the investig	ch remains locked e gation to the estima	
Avoided Costs	ANNU	ALIZE avoided co	osts before en	tering	item (except for	one-time avoide	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	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							



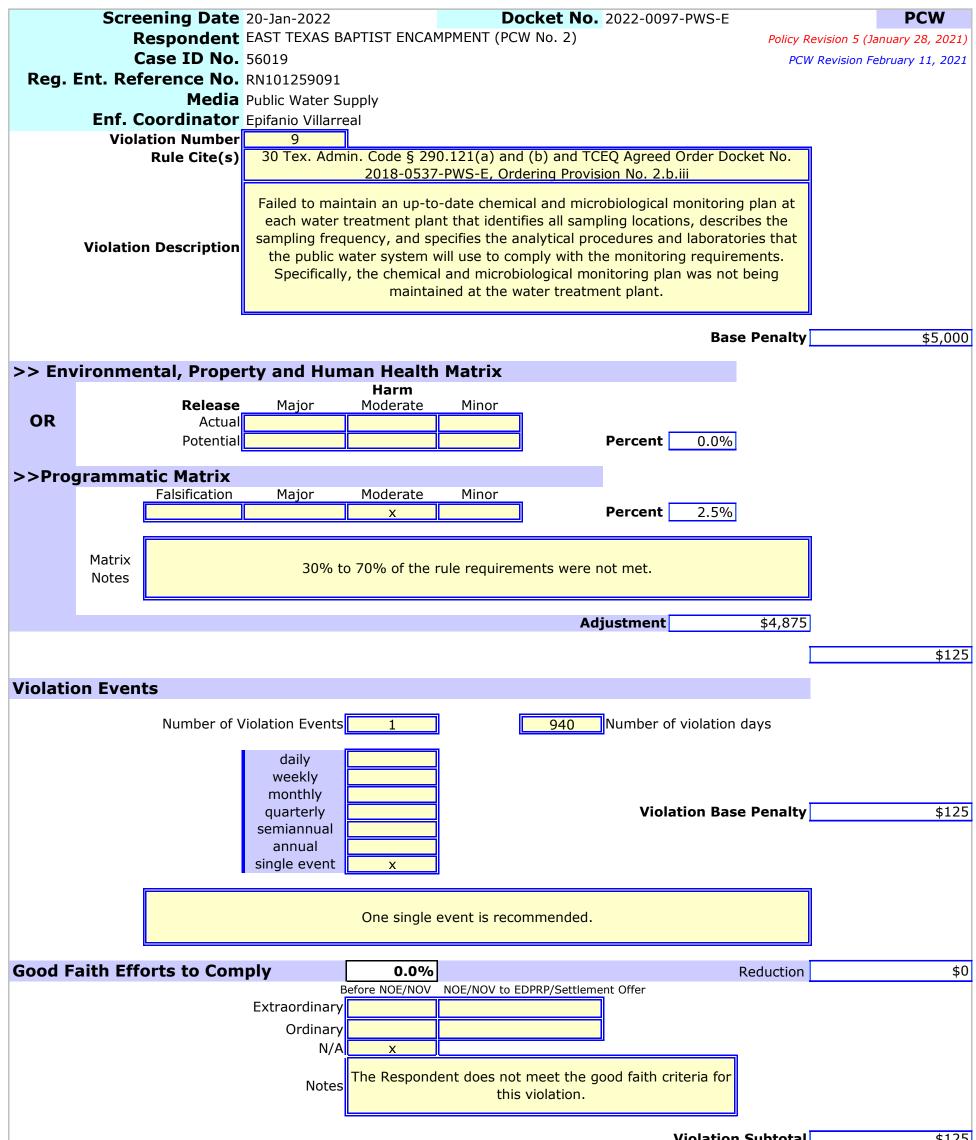
	Violation Subtotal \$250
Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$10 Violation Final Penalty Total \$300
	This violation Final Assessed Penalty (adjusted for limits) \$300

	E	conomic	Benefit	Woi	rksheet		
Respondent	EAST TEXAS E	BAPTIST ENCAMPM	1ENT (PCW No.	2)			
Case ID No.			,	,			
eg. Ent. Reference No.							
-	Public Water S						Years of
Violation No.		արիւչ				<b>Percent Interest</b>	Depreciation
	7						
						5.0	1
	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
<b>Record Keeping System</b>				0.00	\$0	n/a	\$0
Training/Sampling	\$100	12-Nov-2021	1-Dec-2023	2.05	\$10	n/a	\$10
<b>Remediation/Disposal</b>				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
							e and conduct
Notes for DELAYED costs	utilize	ed, calculated from	n the date of the	le meth e invest	igation to the esti	the disinfectant res nated date of comp	iduals is being liance.
Avoided Costs	utilize	ed, calculated from	n the date of the	le meth e invest <b>tering</b>	igation to the estinitem (except for	the disinfectant res mated date of comp one-time avoided	iduals is being liance. I costs)
Avoided Costs Disposal	utilize	ed, calculated from	n the date of the	le meth e invest tering 0.00	igation to the estin item (except for \$0	the disinfectant res nated date of comp one-time avoided \$0	iduals is being liance. I costs) \$0
Avoided Costs Disposal Personnel	utilize	ed, calculated from	n the date of the	le methe invest tering 0.00 0.00	igation to the estin item (except for \$0 \$0	the disinfectant res nated date of comp one-time avoided \$0 \$0	iduals is being liance. I costs) \$0 \$0
<b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	utilize	ed, calculated from	n the date of the	le meth e invest tering 0.00 0.00 0.00	igation to the estin item (except for \$0 \$0 \$0 \$0	the disinfectant res nated date of comp one-time avoided \$0 \$0 \$0	iduals is being liance. 1 costs) \$0 \$0 \$0 \$0
<b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	utilize	ed, calculated from	n the date of the	le meth e invest tering 0.00 0.00 0.00 0.00	igation to the estin item (except for \$0 \$0 \$0 \$0 \$0 \$0	the disinfectant res nated date of comp one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	iduals is being liance. 1 costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	utilize	ed, calculated from	n the date of the	le meth e invest tering 0.00 0.00 0.00 0.00 0.00	igation to the estination           item (except for           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0	the disinfectant res nated date of comp one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	iduals is being liance. I costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	utilize	ed, calculated from	n the date of the	le meth e invest tering 0.00 0.00 0.00 0.00 0.00	igation to the estination           item (except for           \$0	the disinfectant res nated date of comp one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	iduals is being liance. I costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	utilize	ed, calculated from	n the date of the	le meth e invest tering 0.00 0.00 0.00 0.00 0.00	igation to the estination           item (except for           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0           \$0	the disinfectant res nated date of comp one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	iduals is being liance. I costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	utilize	ed, calculated from	n the date of the	le meth e invest tering 0.00 0.00 0.00 0.00 0.00	igation to the estination           item (except for           \$0	the disinfectant res nated date of comp one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	iduals is being liance. I costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date					2022-0097-PWS-E			PCW
		Case ID No.	EAST TEXAS BA	APTIST ENCA	MPMENT (PCV	V NO. Z)				anuary 28, 2021) ebruary 11, 2021
Reg. I		erence No.						700		5010019 11, 2021
			Public Water Su	upply						
	Enf. C	oordinator	Epifanio Villarre	eal						
	Viola	ation Number		in Code 5 20	$\Delta \Delta C(z)(1)$ and			2010	1	
		Rule Cite(s)	30 Tex. Adm		NS-E, Orderi	-	eed Order Docket No No. 2.b.ii	. 2018-		
	Violatio	n Description	Failed to c				st once every three y	ears.		
							Base	e Penalty		\$5,000
>> Env	vironme	ntal, Prope	rty and Hum	nan Health	Matrix					
		Release	Major	<b>Harm</b> Moderate	Minor					
OR		Actual		Moderate						
		Potential			Х		Percent 3.0%			
>>Proc	aramma	tic Matrix								
	ji annia	Falsification	Major	Moderate	Minor					
							Percent 0.0%			
	Matrix Notes	and production	on data, resultin	ig in persons :	served by the	e Facility bei levels prot	e or unavailable wate ng exposed to an ins ective of human heal	gnificant h.		
						Ad	justment	\$4,850		
										\$150
Violatio	on Even	ts								
		Number of \	/iolation Events daily weekly	1		940	Number of violation	days	I	
			monthly quarterly				Violation Base	e Penalty		\$150
			semiannual					-		
			annual single event	X						
		1		~						
				One single	event is reco	mmended.				
Good F	aith Eff	orts to Com	ply	0.0%				Reduction		\$0
			B Extraordinary	efore NOE/NOV	NOE/NOV to El	DPRP/Settleme	ent Offer			
			Ordinary N/A							
			Notes			meet the g violation.	ood faith criteria for			
							Violation	Subtotal		\$150
1							1010101			<del>_</del> 0

Economic Benefit (EB) for this violation	n Statutory Limit Test
Estimated EB Amount	\$42 Violation Final Penalty Total \$180
	This violation Final Assessed Penalty (adjusted for limits) \$180

Item Description         Delayed Costs         Equipment Buildings         Buildings Other (as needed)       0.00       \$0 <th< th=""><th></th><th>E</th><th>conomic</th><th>Benefit</th><th>Woi</th><th><b>'ksheet</b></th><th></th><th></th></th<>		E	conomic	Benefit	Woi	<b>'ksheet</b>		
Case ID No. 56019         NN101259091         Media Public Water Supply         Percent Interest Years of Deprecia         Violation No. 8         Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amo         Delayed Costs         Equipment Buildings       0.00       \$0       \$0       \$0       \$0         Other (as needed) Engine System       0.00       \$0       \$0       \$0       \$0       \$0         Notes for DELAYED costs         Determine Costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$50         Notes for DELAYED costs         Avoided Costs         Notes for DELAYED costs         AnnuALIZE avoided costs before entering item (except for one-time avoided costs)         Notes for DELAYED costs         AnnuALIZE avoided costs before entering item (except for one-time avoided costs)         Personnel         0.00       \$0       \$0       \$0         Supplies / Su	Respondent	EAST TEXAS E	BAPTIST ENCAMPN	IENT (PCW No.	2)			
eg. Ent. Reference No. Media Public Water Supply Violation No. 8 Tem Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amo Tem Description Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System Training/Sampling Remediation/Disposa Other (as needed) Sother (as needed) Description Notes for DELAYED costs Avoided Costs Multize avoided costs before entering item (except for one-time avoided costs) Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) Supplies/Equipment Financial Assurance Other (as needed) Bisposa Remediation/Reporting/Sampling Supplies/Equipment Financial Assurance Other (as needed) Signature and Sampling Supplies/Equipment Financial Assurance Other (as needed) Signature avoided costs before entering item (except for one-time avoided costs) Supplies/Equipment Financial Assurance Other (as needed) Signature avoided costs before entering item (except for one-time avoided costs) Supplies/Equipment Financial Assurance Other (as needed) Signature avoided costs before entering item (except for one-time avoided costs) Supplies/Equipment Financial Assurance Other (as needed) Signature avoided costs Signature avoided costs Signature avoided costs Signature avoided costs Signature avoided costs before entering item (except for one-time avoided cost) Supplies/Equipment Financial Assurance Other (as needed) Signature avoided costs Signature avoided costs Signature avoided costs Signature avoided costs Signature avoided cost Signature avoided				(	_,			
Media       Public Water Supply       Years ( beprecia 5.0         Item Cost       Date Required       Final Date       Yrs       Interest Saved       Costs Saved       EB Amo         Delayed Costs       Equipment Buildings       0.00       \$0<								
Violation No. 8       Percent Interest 0.00       Deprecia 5.0         Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amo Item Description         Delayed Costs       0.00       \$0       \$0       \$0       \$0         Buildings Other (as needed)       0.00       \$0	-							Vears of
Item Cost         Date Required         Final Date         Yrs         Interest Saved         Costs Saved         EB Amore           Delayed Costs         Equipment         0.00         \$0         \$0         \$0         \$0           Buildings         0.00         \$0         \$0         \$0         \$0         \$0           Other (as needed)         Engineering/Construction         0.00         \$0 </th <th></th> <th></th> <th>արիւչ</th> <th></th> <th></th> <th></th> <th><b>Percent Interest</b></th> <th></th>			արիւչ				<b>Percent Interest</b>	
Item Cost         Date Required         Final Date         Yrs         Interest Saved         Costs Saved         EB Amo           Item Description           Delayed Costs           Equipment Buildings         0.00         \$0         \$0         \$0         \$0           Other (as needed)         0.00         \$0         \$0         \$0         \$0         \$0         \$0         \$0           Land         0.00         \$0	violation No.	0						-
Item Description         Delayed Costs         Equipment Buildings Other (as needed)         Other (as needed)       0.00       \$0       \$0       \$0       \$0         Engineering/Construction Land       0.00       \$0       \$0       \$0       \$0       \$0       \$0         Record Keeping System Training/Sampling       0.00       \$0       n/a       \$0								1
Delayed Costs         Equipment Buildings       0.00       \$0       \$0       \$0       \$0         Other (as needed)       0.00       \$0       \$0       \$0       \$0         Engineering/Construction Land       0.00       \$0       \$0       \$0       \$0         Record Keeping System Training/Sampling Remediation/Disposal       0.00       \$0       n/a       \$0         Permit Costs       0.00       \$0       n/a       \$0       \$0       \$0         Notes for DELAYED costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         Motes for DELAYED costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)       \$0       \$0       \$0       \$0         Supplies/Equipment Financial Assurance       0.00       \$0       \$0       \$0       \$0         ONE-TIME avoided costs       \$31       25-Jun-2019       20-Jan-2022       2.58       \$4       \$31       \$35         Other (as needed)       0.00       \$0       \$0       \$0       \$0       \$0       \$0         Supplies/Equipment       0.00       \$0       \$0       \$0       \$0       \$0       \$0       \$0       \$0       \$0		Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Equipment Buildings Other (as needed)         0.00         \$0         \$0         \$0         \$0           Other (as needed)         0.00         \$0	Item Description							
Equipment Buildings         0.00         \$0         \$0         \$0           Other (as needed)         0.00         \$0         \$0         \$0         \$0           Engineering/Construction Land         0.00         \$0         \$0         \$0         \$0           Record Keeping System         0.00         \$0         n/a         \$0           Training/Sampling         0.00         \$0         n/a         \$0           Remediation/Disposal Permit Costs         0.00         \$0         n/a         \$0           Other (as needed)         \$31         25-Jun-2019         1-Dec-2023         4.44         \$7         n/a         \$50           Notes for DELAYED costs         ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         \$0         \$0         \$0           Disposal Personnel         0.00         \$0         \$0         \$0         \$0         \$0           Supplies/Equipment         0.00         \$0         \$0         \$0         \$0         \$0           Supplies/Equipment         0.00         \$0         \$0         \$0         \$0         \$0           Notes for DELAYED costs         ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         \$0         \$0 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>								
Equipment Buildings Other (as needed)         0.00         \$0         \$0         \$0         \$0           Other (as needed)         0.00         \$0	Delaved Costs							
Buildings Other (as needed)         0.00         \$0					0.00	\$0	\$0	\$0
Other (as needed)         Sol         \$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)       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         Notes for DELAYED costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         The delayed cost includes the estimated amount to calibrate the well meter, calculated from the effect date of TCEQ Agreed Order Docket No. 2018-0537-PWS-E to the estimated date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Personnel       0.00       \$0       \$0       \$0         Supplies/Equipment       0.00       \$0       \$0       \$0       \$0         Financial Assurance       0.00       \$0       \$0       \$0       \$0       \$0         ONE-TIME avoided costs       \$31       25-Jun-2019       20-Jan-2022       2.58       \$4       \$31       \$35	Other (as needed)				0.00	\$0	\$0	
Record Keeping System Training/Sampling       0.00       \$0       n/a       \$0         Remediation/Disposal Permit Costs       0.00       \$0       n/a       \$0         Other (as needed)       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$0         Notes for DELAYED costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$0         Avoided Costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$50         Disposal       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$50         Avoided Costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$50         Avoided Costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$50         Avoided Costs       \$31       \$30       \$0 <td>Engineering/Construction</td> <td></td> <td></td> <td></td> <td>0.00</td> <td>\$0</td> <td>\$0</td> <td>\$0</td>	Engineering/Construction				0.00	\$0	\$0	\$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)       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         Notes for DELAYED costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         Avoided Costs       AnnuALIZE avoided costs before entering item (except for one-time avoided costs)       ate of TCEQ Agreed Order Docket No. 2018-0537-PWS-E to the estimated date of compliance.         Disposal       Personnel       0.00       \$0       \$0       \$0         Personnel       0.00       \$0       \$0       \$0       \$0         Supplies/Equipment       Financial Assurance       0.00       \$0       \$0       \$0         ONE-TIME avoided costs       \$31       25-Jun-2019       20-Jan-2022       2.58       \$4       \$31       \$35         Other (as needed)       0.00       \$0       \$0       \$0       \$0       \$0       \$0	Land				0.00		n/a	
Remediation/Disposal Permit Costs Other (as needed)       0.00       \$0       n/a       \$0         Notes for DELAYED costs       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         Notes for DELAYED costs       The delayed cost includes the estimated amount to calibrate the well meter, calculated from the effect date of TCEQ Agreed Order Docket No. 2018-0537-PWS-E to the estimated date of compliance.         Disposal Personnel       0.00       \$0       \$0       \$0         Supplies/Equipment Financial Assurance ONE-TIME avoided costs       0.00       \$0       \$0       \$0         Other (as needed)       \$31       25-Jun-2019       20-Jan-2022       2.58       \$4       \$31       \$35	<b>Record Keeping System</b>				0.00	\$0	n/a	\$0
Permit Costs       0.00       \$0       n/a       \$0         Other (as needed)       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         Notes for DELAYED costs       The delayed cost includes the estimated amount to calibrate the well meter, calculated from the effect date of TCEQ Agreed Order Docket No. 2018-0537-PWS-E to the estimated date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel nspection/Reporting/Sampling       0.00       \$0       \$0       \$0         Supplies/Equipment Financial Assurance ONE-TIME avoided costs       0.00       \$0       \$0       \$0       \$0         ONE-TIME avoided costs       \$31       25-Jun-2019       20-Jan-2022       2.58       \$4       \$31       \$35         Other (as needed)       0.00       \$0       \$0       \$0       \$0       \$0	Training/Sampling							
Other (as needed)       \$31       25-Jun-2019       1-Dec-2023       4.44       \$7       n/a       \$7         Notes for DELAYED costs       The delayed cost includes the estimated amount to calibrate the well meter, calculated from the effect date of TCEQ Agreed Order Docket No. 2018-0537-PWS-E to the estimated date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0	Remediation / Disposal					+ 0		+0
Notes for DELAYED costs       The delayed cost includes the estimated amount to calibrate the well meter, calculated from the effect date of TCEQ Agreed Order Docket No. 2018-0537-PWS-E to the estimated date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs       0.00       \$								
Notes for DELAYED costs       date of TCEQ Agreed Order Docket No. 2018-0537-PWS-E to the estimated date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0 <t< td=""><td>Permit Costs</td><td></td><td></td><td></td><td>0.00</td><td>\$0</td><td>n/a</td><td>\$0</td></t<>	Permit Costs				0.00	\$0	n/a	\$0
Disposal Personnel         0.00         \$0         \$0         \$0         \$0           Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)         Image: Content of the second se	Permit Costs		· · · · · ·		0.00 4.44	\$0 \$7	n/a n/a	\$0 \$7
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)         Image: Content of the system (Content of the system)         0.00         \$0	Permit Costs Other (as needed) Notes for DELAYED costs	The delayed date of	cost includes the o TCEQ Agreed Ordo	estimated amou er Docket No. 2	0.00 4.44 int to ca 018-053	\$0 \$7 Ilibrate the well mo 37-PWS-E to the e	n/a n/a eter, calculated from stimated date of con	\$0 \$7 n the effective mpliance.
Inspection/Reporting/Sampling       0.00       \$0       \$0       \$0         Supplies/Equipment       0.00       \$0       \$0       \$0       \$0         Financial Assurance       0.00       \$0       \$0       \$0       \$0         ONE-TIME avoided costs       \$31       25-Jun-2019       20-Jan-2022       2.58       \$44       \$31       \$35         Other (as needed)       0.00       \$0       \$0       \$0       \$0	Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	The delayed date of	cost includes the o TCEQ Agreed Ordo	estimated amou er Docket No. 2	0.00 4.44 018-053	\$0 \$7 Ilibrate the well mo 37-PWS-E to the e <b>item (except fo</b> r	n/a n/a eter, calculated from stimated date of con one-time avoided	\$0 \$7 n the effective mpliance. d costs)
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)         0         \$0	Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal	The delayed date of	cost includes the o TCEQ Agreed Ordo	estimated amou er Docket No. 2	0.00 4.44 018-053 tering 0.00	\$0 \$7 Ilibrate the well mo 37-PWS-E to the e item (except for \$0	n/a n/a eter, calculated from stimated date of con one-time avoided \$0	\$0 \$7 n the effective mpliance. d costs) \$0
Financial Assurance ONE-TIME avoided costs Other (as needed)         Image: Cost of the state in the st	Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	The delayed date of	cost includes the o TCEQ Agreed Ordo	estimated amou er Docket No. 2	0.00 4.44 018-053 tering 0.00	\$0 \$7 Ilibrate the well mo 37-PWS-E to the e item (except for \$0 \$0	n/a n/a eter, calculated from stimated date of con one-time avoided \$0 \$0	\$0 \$7 n the effective mpliance. d costs) \$0 \$0
ONE-TIME avoided costs         \$31         25-Jun-2019         20-Jan-2022         2.58         \$4         \$31         \$35           Other (as needed)         0.00         \$0 </td <td>Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling</td> <td>The delayed date of</td> <td>cost includes the o TCEQ Agreed Ordo</td> <td>estimated amou er Docket No. 2</td> <td>0.00 4.44 018-053 tering 0.00 0.00</td> <td>\$0 \$7 librate the well mo 37-PWS-E to the e <b>item (except for</b> \$0 \$0 \$0</td> <td>n/a n/a eter, calculated from stimated date of con one-time avoided \$0 \$0 \$0</td> <td>\$0 \$7 n the effective mpliance. d costs) \$0 \$0 \$0 \$0 \$0</td>	Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling	The delayed date of	cost includes the o TCEQ Agreed Ordo	estimated amou er Docket No. 2	0.00 4.44 018-053 tering 0.00 0.00	\$0 \$7 librate the well mo 37-PWS-E to the e <b>item (except for</b> \$0 \$0 \$0	n/a n/a eter, calculated from stimated date of con one-time avoided \$0 \$0 \$0	\$0 \$7 n the effective mpliance. d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed)	Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	The delayed date of	cost includes the o TCEQ Agreed Ordo	estimated amou er Docket No. 2	0.00 4.44 018-053 <b>tering</b> 0.00 0.00 0.00 0.00	\$0 \$7 librate the well mo 37-PWS-E to the e <b>item (except for</b> \$0 \$0 \$0 \$0 \$0	n/a n/a eter, calculated from stimated date of con stimated date of con	\$0 \$7 n the effective mpliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
	Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	The delayed date of ANNU	cost includes the of TCEQ Agreed Ordo	estimated amou er Docket No. 2 osts before en	0.00 4.44 018-053 <b>tering</b> 0.00 0.00 0.00 0.00 0.00	\$0 \$7 librate the well mo 37-PWS-E to the e item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a eter, calculated from stimated date of con stimated date of con	\$0 \$7 n the effective mpliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
	Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	The delayed date of ANNU	cost includes the of TCEQ Agreed Ordo	estimated amou er Docket No. 2 osts before en	0.00 4.44 018-053 <b>tering</b> 0.00 0.00 0.00 0.00 0.00 2.58	\$0 \$7 Ilibrate the well mo 37-PWS-E to the e <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a eter, calculated from stimated date of con stimated date of con	\$0 \$7 n the effective mpliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for AVOIDED costs	Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	The delayed date of	cost includes the o TCEQ Agreed Ordo	estimated amou er Docket No. 2	0.00 4.44 018-053 <b>tering</b> 0.00 0.00 0.00 0.00	\$0 \$7 librate the well mo 37-PWS-E to the e <b>item (except for</b> \$0 \$0 \$0 \$0 \$0	n/a n/a eter, calculated from stimated date of con stimated date of con	n the ef mpliance d costs \$ \$



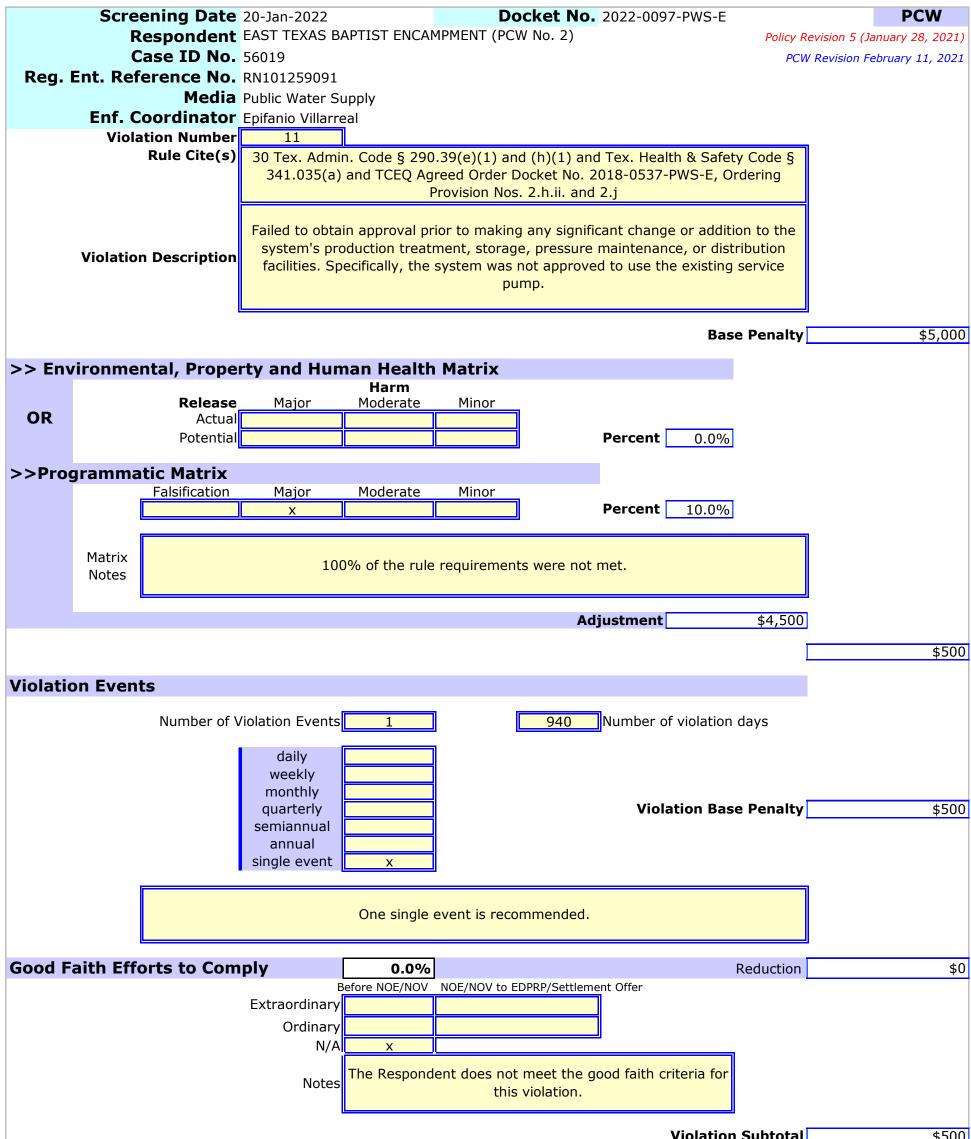
		\$125
Economic Benefit (EB) for this violation	n Statutory Limit Test	
Estimated EB Amount	\$10 Violation Final Penalty Total	\$150
	This violation Final Assessed Penalty (adjusted for limits)	\$150

	E	conomic	Benefit	Wo	rksheet		
Respondent	EAST TEXAS E	APTIST ENCAMPM	IENT (PCW No.	2)			
Case ID No.			·				
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		~~~~				Percent Interest	Depreciation
	5					5.0	15
	Thoma Coot	Data Danuluad	Final Data	Vera	Tutowet Courd	Costs Saved	EB Amount
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0 ¢0	\$0 ¢0	<u>\$0</u>
Engineering/Construction Land	<u> </u>			0.00	\$0 \$0	<u>\$0</u> n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	<u> </u>
Training/Sampling				0.00	\$0	n/a	<u>\$0</u> \$0
Remediation/Disposal				0.00	\$0	n/a	<u>\$0</u>
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$45	25-Jun-2019	1-Jan-2024	4.52	\$10	n/a	\$10
Notes for DELAYED costs		plan at the water t	reatment plant	, calcula		the chemical and m ctive date of TCEQ A of compliance.	-
Avoided Costs		VITZE avoided or	oto hoforo or	toring	itom (oxcont for	one-time avoided	L costs)
AVOIDED COSTS Disposal	ANNO		bata belore en	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	<u>\$0</u> \$0
Supplies/Equipment				0.00	\$0	\$0 \$0	<u>\$0</u>
Financial Assurance				0.00	\$0	\$0	\$0
<b>ONE-TIME</b> 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		\$10

	Scre	ening Date	20-Jan-2022		Do	cket No.	2022-0097-PWS-	·E		PCW
		_	EAST TEXAS B	APTIST ENCA	MPMENT (PCV	V No. 2)		Policy R	evision 5 (Janu	ary 28, 2021)
	C	Case ID No.	56019					РСИ	V Revision Febr	uary 11, 2021
Reg.	Ent. Ref	erence No.	RN101259091							
			Public Water S							
			Epifanio Villarre	eal						
	Viola	ation Number							1	
		Rule Cite(s)	30 Tex. Adm		0.46(n)(3) ar WS-E, Orderi		reed Order Docke No. 2.h.i	t No. 2018-		
	Violatio	n Description	Code § 290.4	1(c)(3)(A) for as notified by	as long as th	e well rema a letter date	as defined in 30 <sup>-7</sup> ins in service. Spe ed April 12, 2012, ved.	ecifically, the		
							B	ase Penalty		\$5,000
>> Env	/ironme	ntal, Prope	rty and Hun	nan Health	Matrix					
				Harm						
OR		<b>Release</b> Actual		Moderate	Minor					
UN		Potential					Percent 0.0	%		
>>Pro	gramma	tic Matrix								
		Falsification	Major	Moderate	Minor					
			x				Percent 10.0	%		
	Matrix Notes		100	0% of the rule	requirement	s were not	met.			
						Ad <u>:</u>	justment	\$4,500	]	
										\$500
Violatio	on Even	te								
Violatio		13								
		Number of \	/iolation Events	1		940	Number of violati	on days		
							-			
			daily							
			weekly monthly							
			quarterly				Violation B	ase Penalty		\$500
			semiannual							
			annual							
			single event	X	J					
				One single	event is reco	mmended.				
Good F								Reduction		\$0
	aith Eff	orts to Com	iply	0.0%						
	aith Eff	orts to Com	E	0.0% Before NOE/NOV		OPRP/Settleme	ent Offer			1 -
	aith Eff	orts to Com		Before NOE/NOV		DPRP/Settleme	ent Offer			
	aith Eff	orts to Com	Extraordinary Ordinary	Before NOE/NOV		DPRP/Settleme	ent Offer			
	aith Eff	orts to Com	Extraordinary	Before NOE/NOV		DPRP/Settleme	ent Offer	_		
	aith Eff	orts to Com	Extraordinary Ordinary N/A	Before NOE/NOV	NOE/NOV to El		ent Offer ood faith criteria f			
	aith Eff	orts to Com	Extraordinary Ordinary	Before NOE/NOV	NOE/NOV to EI					
	aith Eff	orts to Com	Extraordinary Ordinary N/A	Before NOE/NOV	NOE/NOV to EI	meet the go				

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$41 Violation Final Penalty Total \$60
	This violation Final Assessed Penalty (adjusted for limits)       \$60

	E	conomic	Benefit	Wor	rksheet		
Respondent	EAST TEXAS E	BAPTIST ENCAMPM	IENT (PCW No.	2)			
Case ID No.			<b>X</b>	,			
eg. Ent. Reference No.							
	Public Water S						Years of
		supply				<b>Percent Interest</b>	
Violation No.	10						Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		-					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u>
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
<b>Record Keeping System</b>				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
<b>Remediation/Disposal</b>				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	25-Jun-2019	1-Feb-2024	4.61	\$41	n/a	\$41
Notes for DELAYED costs					et No. 2018-0537-	f well completion da PWS-E to the estim	
Avoided Costs	ANNU	ALIZE avoided co	osts before er	itering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							



Economic Benefit (EB) for this violation	n Statutory Limit Test
Estimated EB Amount	\$1,214 Violation Final Penalty Total \$600
	This violation Final Assessed Penalty (adjusted for limits) \$600

	E	conomic	Benefit	Wo	rksheet		
Respondent	EAST TEXAS E	BAPTIST ENCAMP	MENT (PCW No.	2)			
Case ID No.			,	,			
eg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		uppiy				<b>Percent Interest</b>	Depreciation
	11						
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
<b>Engineering/Construction</b>				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 n/a	<u>\$0</u> \$1,214
Other (as needed)	\$5,000	25-Jun-2019	1-May-2024	4.85	\$1,214		
				ount to		plans and specifica	tions for the
Notes for DELAYED costs				ount to			tions for the
Notes for DELAYED costs		vice pump, calcula	ted from the eff	ount to ective o		f plans and specifica ed Order Docket No	tions for the
	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	ount to fective of stimate	date of TCEQ Agre d date of complian	f plans and specifica ed Order Docket No ce.	tions for the . 2018-0537-
Avoided Costs	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	ount to ective o stimate tering	date of TCEQ Agre d date of complian item (except for	<sup>•</sup> plans and specifica ed Order Docket No ce. • one-time avoided	tions for the . 2018-0537- l costs)
Avoided Costs Disposal	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	ount to ective o stimate tering 0.00	date of TCEQ Agre d date of complian item (except for \$0	plans and specifica ed Order Docket No ce. one-time avoided \$0	tions for the . 2018-0537- I costs) \$0
Avoided Costs Disposal Personnel	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	cunt to ective of tering 0.00 0.00	date of TCEQ Agre d date of complian item (except for \$0 \$0	plans and specifica ed Order Docket No ce. one-time avoideo \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00	date of TCEQ Agre d date of complian item (except for \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0	tions for the . 2018-0537- <b>1 costs)</b> \$0 \$0 \$0 \$0
<b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00	date of TCEQ Agre d date of complian <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoideo</b> \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	date of TCEQ Agre d date of complian s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
<b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00	date of TCEQ Agre d date of complian <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	ate of TCEQ Agre d date of complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	ate of TCEQ Agre d date of complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	ate of TCEQ Agre d date of complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	ate of TCEQ Agre d date of complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	ate of TCEQ Agre d date of complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	existing serv	vice pump, calcula	ted from the eff PWS-E to the e	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	ate of TCEQ Agre d date of complian item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	plans and specifica ed Order Docket No ce. <b>one-time avoided</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	tions for the . 2018-0537- d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date				<b>et No.</b> 2022-0097-PWS-E		PCW
		-		BAPTIST ENCA	MPMENT (PCW N	lo. 2)	Policy Re	evision 5 (January 28, 2021)
		Case ID No.					PCW	Revision February 11, 2021
Reg.	Ent. Ref	erence No.	RN101259091	L				
	_		Public Water S					
		Coordinator		real				
	Viola	ation Number		min Codo S 20		and TCEO Agreed Order Dec	kat Na	
		Rule Cite(s)	30 Tex. Ad			) and TCEQ Agreed Order Doc ng Provision No. 2.b.vi	KET NO.	
	Violatio	n Description			•	disinfectant residual analyzer lutions of known concentration		
						Base	e Penalty	\$5,000
>> Env	vironme	ntal, Prope	rty and Hu	man Health	Matrix			
		Release	Major	<b>Harm</b> Moderate	Minor			
OR		Actual						
		Potential		х		Percent 5.0%		
>>Pro	gramma	<b>tic Matrix</b> Falsification	Major	Moderate	Minor			
			Мајој	Moderate	мпо	Percent 0.0%		
			1		II			
	Matrix Notes	detection of i	mproperly disi	nfected water a	and potentially e	sidual analyzer could result in xpose persons served by the eed levels protective of huma	Facility to n health.	
						Adjustment	\$4,750	
							Γ	\$250
		• -					[	\$250
Violatio	on Even	ts					[	\$250
Violatio	on Even		√iolation Event	s 10	] [7]	872 Number of violation	[ days	\$250
Violatio	on Even		Violation Event	s <u>10</u>		872 Number of violation	days	\$250
Violatio	on Even		daily	s <u>10</u>		872 Number of violation	days	\$250
Violatio	on Even		daily weekly	s <u>10</u>		872 Number of violation	days	\$250
Violatio	on Even		daily	s <u>10</u>		872 Number of violation		
Violatio	on Even		daily weekly monthly quarterly semiannual					
Violatio	on Even		daily weekly monthly quarterly semiannual annual	X				
Violatio	on Even		daily weekly monthly quarterly semiannual	X				
Violatio	on Even	Number of N	daily weekly monthly quarterly semiannual annual single event	recommended	, calculated fror g, January 20, 2	<b>Violation Base</b> n September 1, 2019, to the c	e Penalty	
Violatio	on Even	Number of N	daily weekly monthly quarterly semiannual annual single event	recommended		<b>Violation Base</b> n September 1, 2019, to the c	e Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event	recommended screenin	g, January 20, 2	<b>Violation Base</b> n September 1, 2019, to the o	e Penalty	\$2,500
		Number of N	daily weekly monthly quarterly semiannual annual single event	recommended screenin	g, January 20, 2	<b>Violation Base</b> n September 1, 2019, to the o	e Penalty	\$2,500
		Number of N	daily weekly monthly quarterly semiannual annual single event erly events are ply Extraordinar	recommended screenin	g, January 20, 2	<b>Violation Base</b> n September 1, 2019, to the o	e Penalty	\$2,500
		Number of N	daily weekly monthly quarterly semiannual annual single event erly events are crly events are Extraordinar	recommended screenin	g, January 20, 2	<b>Violation Base</b> n September 1, 2019, to the o	e Penalty	\$2,500
		Number of N	daily weekly monthly quarterly semiannual annual single event erly events are ply Extraordinar	recommended screenin	g, January 20, 2 NOE/NOV to EDPR	Violation Base	e Penalty	\$2,500
		Number of N	daily weekly monthly quarterly semiannual annual single event erly events are crly events are Extraordinar	recommended screenin 0.0% Before NOE/NOV y A X The Respond	g, January 20, 2 NOE/NOV to EDPF	Violation Base n September 1, 2019, to the o 2022.	e Penalty	\$2,500
		Number of N	daily weekly monthly quarterly semiannual annual single event erly events are crly events are Extraordinar Ordinar	recommended screenin 0.0% Before NOE/NOV y A X The Respond	g, January 20, 2 NOE/NOV to EDPR	Violation Base n September 1, 2019, to the o 2022.	e Penalty	\$2,500
		Number of N	daily weekly monthly quarterly semiannual annual single event erly events are crly events are Extraordinar Ordinar	recommended screenin 0.0% Before NOE/NOV y A X The Respond	g, January 20, 2 NOE/NOV to EDPF	Violation Base n September 1, 2019, to the o 2022.	e Penalty	\$250
Good F	aith Eff	Number of N	daily weekly monthly quarterly semiannual annual single event erly events are Extraordinar Ordinar N//	recommended screenin D.0% Before NOE/NOV y A x The Respond	g, January 20, 2 NOE/NOV to EDPF	Violation Base n September 1, 2019, to the o 2022. P/Settlement Offer eet the good faith criteria for plation.	e Penalty	\$2,500

Estimated EB Amount	\$0 Violation Final Penalty Total \$3,000
	This violation Final Assessed Penalty (adjusted for limits) \$3,000

	E	conomic	Benefit	Wor	<b>'ksheet</b>		
Respondent	EAST TEXAS E	BAPTIST ENCAMPM	1ENT (PCW No.	2)			
Case ID No.	56019						
eg. Ent. Reference No.	RN101259091						
	Public Water S						Years of
Violation No.		,				Percent Interest	Depreciatio
						5.0	
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Them Decemination		Date Required	Final Date	115	Interest Saveu	COSIS Saveu	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	\$0 <b>\$0</b>
Land Record Keeping System				0.00	<u>\$0</u> \$0	n/a n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Kemediation/ Disposal							JU JU
Permit Costs							
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed) Notes for DELAYED costs	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00 0.00 nt to pro using ch rksheet	\$0 \$0 operly verify the a alorine solutions of for Violation No. 1	n/a n/a ccuracy of the man known concentrati of PCW No. 1.	\$0 \$0 ual disinfectar ions is capture
Other (as needed) Notes for DELAYED costs Avoided Costs	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00 0.00 nt to pro using ch rksheet	\$0 \$0 operly verify the a nlorine solutions of for Violation No. 1 item (except for	n/a n/a ccuracy of the man known concentrati of PCW No. 1.	\$0 \$0 ual disinfectar ions is capture <b>d costs)</b>
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00 0.00 nt to pro using ch rksheet tering 0.00	\$0 \$0 operly verify the a norine solutions of for Violation No. 1 item (except for \$0	n/a n/a ccuracy of the man known concentrat of PCW No. 1. one-time avoide \$0	\$0 \$0 ual disinfectar ions is capture <b>d costs)</b> \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00 0.00 nt to pro using ch rksheet tering 0.00	\$0 \$0 operly verify the a alorine solutions of for Violation No. 1 item (except for \$0 \$0	n/a n/a ccuracy of the man known concentrati of PCW No. 1. one-time avoide \$0 \$0	\$0 \$0 ual disinfectar ions is capture <b>d costs)</b> \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00 0.00 nt to pro using ch rksheet 0.00 0.00 0.00	\$0 \$0 perly verify the a plorine solutions of for Violation No. 1 item (except for \$0 \$0 \$0	n/a n/a ccuracy of the man known concentration of PCW No. 1. one-time avoide \$0 \$0 \$0	\$0 \$0 ual disinfectar ions is capture <b>d costs)</b> \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00 0.00 nt to pro using ch rksheet 0.00 0.00 0.00 0.00	\$0 \$0 operly verify the a alorine solutions of for Violation No. 1 item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a ccuracy of the man known concentrati of PCW No. 1. one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 ual disinfectan ions is capture d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00         0.00         0.00         using ch         rksheet         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00	\$0 \$0 perly verify the a lorine solutions of for Violation No. 1 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ccuracy of the man known concentration of PCW No. 1. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 ual disinfectar ons is capture d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00         0.00         0.00         using ch         rksheet         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00	\$0 \$0 perly verify the a lorine solutions of for Violation No. 1 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ccuracy of the man known concentration of PCW No. 1. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 ual disinfectar ons is capture d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	residual analy	zers at least once in the Econo	every 90 days mic Benefit Wo	0.00         0.00         0.00         using ch         rksheet         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00         0.00	\$0 \$0 perly verify the a lorine solutions of for Violation No. 1 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ccuracy of the man known concentration of PCW No. 1. one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 ual disinfectar ons is capture d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	residual analy	zers at least once in the Econo ALIZE avoided co ALIZE avoided co ALIZE avoided co ALIZE avoided co Cost includes the e zers at least once	every 90 days mic Benefit Wo osts before en stimated amou every 90 days	0.00         0.00         0.00         using ch         rksheet         tering         0.00	\$0 \$0 perly verify the a lorine solutions of for Violation No. 1 item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a ccuracy of the man known concentration of PCW No. 1. <b>cone-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 al disinfectar ions is capture <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

6	OMMISSION	
2		
١٩	<b>N</b>	
240	MENTAL QUALT	

# **Compliance History Report**

Compliance History Report for CN600691976, RN101259091, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Resp Owner/Operato	pondent, or CN600691976, EAST TEXAS BAPTIST or: ENCAMPMENT	Classification: NOT APPLICABLE	Rating: N/A			
Regulated Entit	ty: RN101259091, EAST TEXAS BAPTIST ENCAMPMENT	Classification: NOT APPLICABLE	Rating: N/A			
Complexity Poi	nts: N/A	Repeat Violator: N/A				
CH Group:	14 - Other	<u> </u>				
Location:	ON FARM-TO-MARKET ROAD 2939, THREE	MILES SOUTHWEST OF NEWTON, NEWTO	ON COUNTY, TEXAS			
TCEQ Region:	REGION 10 - BEAUMONT					
ID Number(s): PUBLIC WATER S	SYSTEM/SUPPLY REGISTRATION 1760011					
<b>Compliance His</b>	story Period: September 01, 2017 to August 31, 2	022 <b>Rating Year:</b> 2022 <b>R</b>	ating Date: 09/01/2022			
Date Compliand	ce History Report Prepared: April 24, 2023					
Agency Decisio	n Requiring Compliance History: Enforcer	ment				
Component Per	riod Selected: April 24, 2018 to April 24, 2023					
TCEQ Staff Men	nber to Contact for Additional Information R	egarding This Compliance History				
-	IFANIO VILLARREAL	Phone: (361) 881-6991				
2) Has there been a Components ( A. Final Orders 1 Effectiv Class Citat Desc as th Class Citat Desc oper cata	In in existence and/or operation for the full five year con a (known) change in ownership/operator of the site duri (Multimedia) for the Site Are Listed in S s, court judgments, and consent decrees: ve Date: 06/25/2019 ADMINORDER 20 sification: Moderate tion: 30 TAC Chapter 290, SubChapter D 290.46(n)(3 cription: Failed to keep on file copies of well completion he well remains in service sification: Minor tion: 30 TAC Chapter 290, SubChapter D 290.42(I) cription: Failed to compile and maintain a thorough and rator with routine maintenance and repair procedures, w istrophe, as well as provide telephone numbers of water contacted in the event of an emergency	Ing the compliance period? N ections A - J 018-0537-PWS-E (1660 Order-Agreed O 3) In data as defined in 30 TEX. ADMIN. CODE d up-to-date plant operations manual of su vith protocols to be utilized in the event of su	§ 290.41(c)(3)(A) for as long ifficient detail to provide the a natural or man-made			
Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(iii) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(C)(i) 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(D)(ii) Description: Failed to maintain water works operation and maintenance records and make them available for review to the Executive Director during the investigation Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.46(s)(1) Description: Failed to calibrate the Facility's well meter at least once every three years Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(2)						

Description: 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 Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(i) Description: Failed to verify the accuracy of the manual disinfectant residual analyzer at least once every 90 days using chlorine solutions of known concentration Classification: Minor 30 TAC Chapter 290, SubChapter D 290.46(I) Citation: Description: Failed to flush all dead-end mains at monthly intervals. Classification: Minor Citation 30 TAC Chapter 290, SubChapter F 290.110(c)(4)(A) Description: Failed to monitor the disinfectant residual at various locations throughout the distribution system at least once every seven davs Classification: Minor Citation: 30 TAC Chapter 290, SubChapter F 290.109(d)(1)(A) Description: Failed to collect routine distribution coliform samples at a customer's premise, dedicated sampling station, or other designated compliance sampling location at active service connections which are representative of water quality throughout the distribution system Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.42(f)(1)(B) Description: Failed to provide day tanks to minimize the possibility of severly overfeeding liquid chemicals from bulk storage facilities Classification: Minor 30 TAC Chapter 290, SubChapter D 290.42(f)(1)(E)(i) Citation: Description: Failed to provide adequate containment facilities for all liquid chemical storage tanks Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.46(s) Description: Failed to use accurate testing equipment to monitor the effectiveness of any chemical treatment Classification: Minor Citation: 30 TAC Chapter 290, SubChapter F 290.121(a) 30 TAC Chapter 290, SubChapter F 290.121(b) Description: Failed to maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the public water system will use to comply with the monitoring requirements, Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(O) 30 TAC Chapter 290, SubChapter D 290.46(m) Description: Failed to provide an intruder-resistant fence around the water treatment plant Classification: Moderate 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(A) Citation: 30 TAC Chapter 290, SubChapter F 290.110(b)(4) 5A THSC Chapter 341, SubChapter A 341.0315(c) Description: Failed to maintain a minimum disinfectant residual of 0.2 mg/L free chlorine throughout the distribution system at all times Classification: Minor 30 TAC Chapter 290, SubChapter D 290.39(h)(1) Citation: 5A THSC Chapter 341, SubChapter A 341.0315(a)

Description: Failed to obtain approval prior to making any significant change or addition to the system's production treatment, storage, pressure maintenance, or distribution facilities

#### 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.

Compliance History Report for CN600691976, RN101259091, Rating Year 2022 which includes Compliance History (CH) components from April 24, 2018, through April 24, 2023.

N/A

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

#### Sites Outside of Texas:

N/A

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



§

§ §

§ §

§

IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING EAST TEXAS BAPTIST ENCAMPMENT RN101259091

**BEFORE THE** 

**TEXAS COMMISSION ON** 

**ENVIRONMENTAL QUALITY** 

## AGREED ORDER DOCKET NO. 2022-0097-PWS-E

On \_\_\_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding EAST TEXAS BAPTIST ENCAMPMENT (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 on Farm-to-Market Road 2939, three miles southwest of Newton, Newton County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 28 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(71).
- 2. During an investigation at the Facility conducted on November 12, 2021, an investigator documented that:
  - a. The ground storage tank ("GST") was required to be inspected by May 19, 2018, May 19, 2019, May 19, 2020 and again by May 19, 2021, but was not inspected;
  - b. The Respondent recorded the date and time when flushing was conducted. However, the locations where flushing was conducted were not being recorded;

- c. Records of the amount of each chemical used each week were not maintained onsite for review;
- d. The wiring was exposed on the chemical pump for the polyphosphate located in the chemical room;
- e. The exterior of the GST had surface rust;
- f. The roof hatch did not have the ability to be locked;
- g. The correct procedure for monitoring the disinfectant residual was not being followed. The Respondent used too much water in the sample vial, which resulted in a lower chlorine residual than what the investigator obtained. When the investigator inquired about sampling the residual in high range, the Respondent was not familiar with the procedure and did not have the equipment (plastic vials) for analyzing the chlorine residual in the high range;
- h. The Respondent did not calibrate the Facility's well meter at least once every three years;
- i. The chemical and microbiological monitoring plan was not being maintained at the water treatment plant;
- j. The Respondent was notified by the TCEQ in a letter dated April 12, 2012, that the use of the well was not approved;
- k. The system was not approved to use the existing service pump; and
- l. The Respondent did not verify the accuracy of the manual disinfectant residual analyzer at least once every 90 days using chlorine solutions of known concentrations.

## **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 inspect the Facility's GST annually, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(1)(A).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to flush all dead-end mains at monthly intervals, in violation of 30 TEX. ADMIN. CODE § 290.46(l).
- 4. As evidenced by Finding of Fact No. 2.c, 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)(A)(i)(III).

- 5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to ensure that the electrical wiring is securely installed in compliance with a local or national electrical code, in violation of 30 TEX. ADMIN. CODE § 290.46(v).
- 6. As evidenced by Finding of Fact No. 2.e, the Respondent failed to ensure that all clearwells, GSTs, standpipes, and elevated storage tanks are painted, disinfected, and maintained in strict accordance with current American Water Works Association ("AWWA") standards, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(8).
- 7. As evidenced by Finding of Fact No. 2.f, the Respondent failed to ensure that the Facility's GST hatch remains locked except during inspections and maintenance, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(2).
- 8. As evidenced by Finding of Fact No. 2.g, the Respondent failed to use an acceptable analytical method for disinfectant analyses, in violation of 30 TEX. ADMIN CODE § 290.119(b)(7).
- 9. As evidenced by Finding of Fact No. 2.h, the Respondent failed to calibrate the Facility's well meter at least once every three years, in violation of 30 TEX. ADMIN. CODE § 290.46(s)(1) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.b.ii.
- 10. As evidenced by Finding of Fact No. 2.i, the Respondent failed to maintain an up-to-date chemical and microbiological monitoring plan at each water treatment plant that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the public water system will use to comply with the monitoring requirements, in violation of 30 TEX. ADMIN. CODE § 290.121(a) and (b) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.b.iii.
- 11. As evidenced by Finding of Fact No. 2.j, the Respondent failed to keep on file copies of well completion data as defined in 30 TEX. ADMIN. CODE § 290.41(c)(3)(A) for as long as the well remains in service, in violation of 30 TEX. ADMIN. CODE § 290.46(n)(3) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.h.i.
- 12. As evidenced by Finding of Fact No. 2.k, the Respondent failed to obtain approval prior to making any significant change or addition to the system's production treatment, storage, pressure maintenance, or distribution facilities, in violation of 30 TEX. ADMIN. CODE § 290.39(e)(1) and (h)(1) and TEX. HEALTH & SAFETY CODE § 341.035(a) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision Nos. 2.h.ii. and 2.j.
- 13. As evidenced by Finding of Fact No. 2.l, the Respondent failed to verify the accuracy of the manual disinfectant residual analyzer at least once every 90 days using chlorine solutions of known concentrations, in violation of 30 TEX. ADMIN. CODE § 290.46 (s)(2)(C)(i) and TCEQ Agreed Order Docket No. 2018-0537-PWS-E, Ordering Provision No. 2.b.vi.

- 14. 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.
- 15. An administrative penalty in the amount of \$9,150 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 Revenue Operations Section of TCEQ's Financial Administration Division reviewed financial documentation submitted by the Respondent and determined that the Respondent is unable to pay all or part of the penalty. Therefore, \$5,550 of the penalty is deferred contingent upon the Respondent's compliance with all the terms of this Order and shall be waived only upon full compliance with all of the terms and conditions in this Order. If the Respondent fails to comply with any requirement of this Order, including any payment schedule, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

The Respondent paid \$100 of the undeferred penalty. The remaining amount of \$3,500 of the undeferred penalty shall be paid in 35 monthly payments of \$100 each. The first monthly payment shall be paid within 30 days after the effective date of this Order. The subsequent payment shall each be paid not later than 30 days following the due date of the previous payment until the penalty is paid in full. If the Respondent fails to comply with the payment requirements of this Order, including the payment schedule, the Executive Director may accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. The Respondent's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms and conditions of this Order and the Executive Director may demand payment of all or part of the deferred penalty.

## **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. 15 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: EAST TEXAS BAPTIST ENCAMPMENT, Docket No. 2022-0097-PWS-E" to:

## EAST TEXAS BAPTIST ENCAMPMENT DOCKET NO. 2022-0097-PWS-E Page 5

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. Conduct the inspection of the Facility's GST, in accordance with 30 TEX. ADMIN. CODE § 290.46;
    - ii. Modify the flushing program and update the Facility's operational guidance to ensure that all dead-end mains are flushed if water quality complaints are received from water customers or if disinfectant residuals fall below acceptable levels, in accordance with 30 TEX. ADMIN. CODE § 290.46;
    - iii. Compile and maintain properly completed water works operation and maintenance records, including but not limited to records of the amount of each chemical used each week, in accordance with 30 TEX. ADMIN. CODE § 290.46;
    - iv. Secure the electrical wiring in compliance with a local or national code for the chemical pump, in accordance with 30 TEX. ADMIN. CODE § 290.46;
    - v. Update the Facility's operational guidance and conduct employee training to ensure that the acceptable method used to collect the disinfectant residuals is being utilized, in accordance with 30 TEX. ADMIN. CODE § 290.119;
    - vi. Calibrate the Facility's well meter, in accordance with 30 TEX. ADMIN. CODE § 290.46; and
    - vii. Verify the accuracy of the manual disinfectant residual analyzer once every 90 days using chlorine solutions of known concentrations, in accordance with 30 TEX. ADMIN. CODE § 290.46.
  - b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.i 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.vii.
  - c. Within 60 days after the effective date of this Order:

- i. Provide a lock for the GST's roof hatch and ensure the roof hatch remains locked except during inspections and maintenance, in accordance 30 TEX. ADMIN. CODE § 290.43; and
- ii. Maintain a copy of an up-to-date chemical and microbiological monitoring plan at each water treatment plant, in accordance with 30 TEX. ADMIN. CODE § 290.121.
- d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.i below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.c.i and 2.c.ii.
- e. Within 90 days after the effective date of this Order, keep on file copies of well completion data for the well as defined in 30 TEX. ADMIN. CODE § 290.41(c)(3)(A), in accordance with 30 TEX. ADMIN. CODE § 290.46.
- f. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.i below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.e.
- g. Within 180 days after the effective date of this Order:
  - i. Repaint the ground storage tank's exterior in strict accordance with AWWA standards, in accordance with 30 TEX. ADMIN. CODE § 290.43; and
  - ii. Submit plans and specifications of the public water supply for review and approval for the significant changes or additions to the system's production, treatment, storage, pressure maintenance, or distribution facilities, including the as-built plans and specifications for the existing service pump, 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

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

- h. Within 270 days after the effective date of this Order, obtain approval of the plans and specifications for the service pump, in accordance with 30 TEX. ADMIN. CODE § 290.39.
- i. Within 285 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.h. 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:

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.

EAST TEXAS BAPTIST ENCAMPMENT DOCKET NO. 2022-0097-PWS-E Page 9

## SIGNATURE PAGE

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

For the Executive Director

<u>1/25/2024</u> 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.

Name (Printed or typed) Authorized Representative of EAST TEXAS BAPTIST ENCAMPMENT

12.	12.	23	
Date	•		

Executive Director

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