

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 62205  
Carol Ann Norra dba Carol Norra Mobile Home Park  
RN101282572  
Docket No. 2022-0425-PWS-E

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**Order Type:**  
Default Order

**Media:**  
PWS

**Small Business:**  
N/A

**Location(s) Where Violation(s) Occurred:**  
205 Reidland Road, near Crosby, Harris County

**Type of Operation:**  
public water system

**Other Significant Matters:**

|   |                                       |
|---|---------------------------------------|
| Additional Pending Enforcement Actions: | Yes; 2021-1219-PWS-E; 2023-1575-PWS-E |
| Past-Due Penalties:                     | None                                  |
| Past-Due Fees:                          | \$546.67                              |
| Other:                                  | None                                  |
| Interested Third Parties:               | None                                  |

**Texas Register Publication Date:** June 7, 2024

**Comments Received:** None

**Penalty Information**

**Total Penalty Assessed:** \$7,050

**Total Paid to General Revenue:** \$0

**Total Due to General Revenue:** \$7,050

**Compliance History Classifications:**

Person/CN – N/A  
Site/RN –N/A

**Major Source:** No

**Statutory Limit Adjustment:** None

**Applicable Penalty Policy:** January 28, 2021

**Investigation Information**

**Complaint Date(s):** N/A

**Date(s) of Investigation:** February 2, 2022

**Date(s) of NOV(s):** N/A

**Date(s) of NOE(s):** April 6, 2022

**Violation Information**

1. Failed to maintain at the PWS accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank until the Facility is decommissioned [30 TEX. ADMIN. CODE § 290.46(n)(1)].
2. 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), (f)(3)(A)(i)(III), (f)(3)(A)(ii)(V), (f)(3)(A)(iv), (f)(3)(B)(iv), and (f)(3)(D)(ii)].
3. Failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies [30 TEX. ADMIN. CODE § 290.46(n)(2)].
4. Failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements [30 TEX. ADMIN. CODE § 290.121(a) and (b)].
5. Failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference [30 TEX. ADMIN. CODE § 290.42(l)].
6. Failed to provide sufficient power to meet the capacity requirements in accordance with the affected utility's approved Emergency Preparedness Plan ("EPP") [30 TEX. ADMIN. CODE § 290.45(h)(1)].
7. 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)].
8. Failed to seal the wellhead by a gasket or sealing compound and provide a well casing vent for the well that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated, and located so as to minimize the drawing of contaminants into the well [30 TEX. ADMIN. CODE § 290.41(c)(3)(K)].
9. Failed to provide an intruder-resistant fence or well house around each well unit, potable water storage tank, and pressure maintenance facility that remains locked during periods of darkness and when the Facility is unattended [30 TEX. ADMIN. CODE §§ 290.41(c)(3)(O) and 290.43(e)].
10. Failed to pay annual Public Health Service fees and/or any associated late fees for TCEQ Financial Administration Account No. 91011926 [TEX. WATER CODE § 5.702 and 30 TEX. ADMIN. CODE § 290.51(a)(6)].

**Corrective Actions/Technical Requirements**

**Corrective Action(s) Completed:**

None

**Technical Requirements:**

1. Within 30 days:
  - a. Compile and maintain properly completed water works operation and maintenance records, including but not limited to records for the amount of each chemical used each week, the amount of water treated each week, the dates that dead-end mains were flushed, the calibration records for flow meters, and the results of inspections for all water storage and pressure maintenance facilities;
  - b. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies;
  - c. Secure all electrical wiring in compliance with a local or national code for the well house, pressure tank housing, and sodium hypochlorite injection pump;

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- d. Conduct employee training to reinforce existing procedures to ensure that all housing that protects each well unit, potable water storage tank, and pressure maintenance facility is kept locked while unattended; and
  - e. Submit payment for all outstanding fees, interest, and penalties for TCEQ Financial Administration Account No. 91011926.
2. Within 60 days:
- a. Develop and begin maintaining a chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements; and
  - b. Develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference.
3. Within 90 days:
- a. Compile and maintain accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank;
  - b. Provide a quick-connect system which provides sufficient power to meet the capacity requirements in accordance with the affected utility's approved EPP;
  - c. Provide a well casting vent with an opening that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated, and located so as to minimize the drawing of contaminants into the well; and
  - d. Lock the well house and the housing for the pressure tanks to protect the Facility's well unit, potable water storage tanks, and pressure maintenance facilities, including but not limited to locking and bolting down the well house and locking the housing for the pressure tanks.
4. Submit written certification to demonstrate compliance:
- a. Within 45 days for Technical Requirements Nos 1.a. through 1.d.;
  - b. Within 75 days for Technical Requirements Nos 2.a., and 2.b.; and
  - c. Within 105 days for Technical Requirements Nos 3.a. through 3.d.

**Litigation Information**

**Date Petition(s) Filed:** January 19, 2024; March 7, 2024  
**Date(s) of Service:** unclaimed; unclaimed  
**Date Answer(s) Filed:** N/A

**Contact Information**

**TCEQ Attorneys:** Casey Kurnath, Litigation Division, (512) 239-3400  
Sheldon Wayne, Public Interest Counsel, (512) 239-6363  
**TCEQ Litigation Agenda Coordinator:** Katherine McKenzie, Litigation Division, (512) 239-2575  
**TCEQ Enforcement Coordinator:** Samantha Salas, Enforcement Division, (512) 239-1543  
**TCEQ Regional Contact:** Westin Massey, Houston Regional Office, (713) 767-3500  
**Respondent Contact:** Carol Ann Norra, Carol Norra Mobile Home Park, 205 Reidland Road, Trailer 22, Crosby, Texas 77532

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# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

|              |                 |             |                  |             |                |  |
|--------------|-----------------|-------------|------------------|-------------|----------------|--|
| <b>DATES</b> | <b>Assigned</b> | 11-Apr-2022 | <b>Screening</b> | 13-Apr-2022 | <b>EPA Due</b> |  |
|              | <b>PCW</b>      | 14-Apr-2022 |                  |             |                |  |

## RESPONDENT/FACILITY INFORMATION

|                             |  |                           |       |  |  |
|-----------------------------|--|---------------------------|-------|--|--|
| <b>Respondent</b>           | Carol Ann Norra dba Carol Norra Mobile Home Park |                           |       |  |  |
| <b>Reg. Ent. Ref. No.</b>   | RN101282572                                      |                           |       |  |  |
| <b>Facility/Site Region</b> | 12-Houston                                       | <b>Major/Minor Source</b> | Minor |  |  |

## CASE INFORMATION

|  |                     |                              |                    |
|--|---------------------|------------------------------|--------------------|
| <b>Enf./Case ID No.</b>                | 62205               | <b>No. of Violations</b>     | 10                 |
| <b>Docket No.</b>                      | 2022-0425-PWS-E     | <b>Order Type</b>            | 1660               |
| <b>Media Program(s)</b>                | Public Water Supply | <b>Government/Non-Profit</b> | No                 |
| <b>Multi-Media</b>                     |                     | <b>Enf. Coordinator</b>      | Samantha Salas     |
|  |                     | <b>EC's Team</b>             | Enforcement Team 5 |
| <b>Admin. Penalty \$ Limit Minimum</b> | \$50                | <b>Maximum</b>               | \$5,000            |

## Penalty Calculation Section

|   |                   |         |
|---|-------------------|---------|
| <b>TOTAL BASE PENALTY (Sum of violation base penalties)</b> | <b>Subtotal 1</b> | \$7,050 |
|---|-------------------|---------|

## ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

|                           |      |                   |                                |     |
|---------------------------|------|-------------------|--------------------------------|-----|
| <b>Compliance History</b> | 0.0% | <b>Adjustment</b> | <b>Subtotals 2, 3, &amp; 7</b> | \$0 |
|---------------------------|------|-------------------|--------------------------------|-----|

Notes: No adjustment for Compliance History.

|                    |    |      |                    |                   |     |
|--------------------|----|------|--------------------|-------------------|-----|
| <b>Culpability</b> | No | 0.0% | <b>Enhancement</b> | <b>Subtotal 4</b> | \$0 |
|--------------------|----|------|--------------------|-------------------|-----|

Notes: The Respondent does not meet the culpability criteria.

|  |                   |     |
|--|-------------------|-----|
| <b>Good Faith Effort to Comply Total Adjustments</b> | <b>Subtotal 5</b> | \$0 |
|--|-------------------|-----|

|                         |      |                     |                   |     |
|-------------------------|------|---------------------|-------------------|-----|
| <b>Economic Benefit</b> | 0.0% | <b>Enhancement*</b> | <b>Subtotal 6</b> | \$0 |
|-------------------------|------|---------------------|-------------------|-----|

Total EB Amounts: \$923  
Estimated Cost of Compliance: \$6,365  
\*Capped at the Total EB \$ Amount

|                             |                       |         |
|-----------------------------|-----------------------|---------|
| <b>SUM OF SUBTOTALS 1-7</b> | <b>Final Subtotal</b> | \$7,050 |
|-----------------------------|-----------------------|---------|

|   |      |                   |     |
|---|------|-------------------|-----|
| <b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b> | 0.0% | <b>Adjustment</b> | \$0 |
|---|------|-------------------|-----|

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

|                             |         |
|-----------------------------|---------|
| <b>Final Penalty Amount</b> | \$7,050 |
|-----------------------------|---------|

|                                   |                               |         |
|-----------------------------------|-------------------------------|---------|
| <b>STATUTORY LIMIT ADJUSTMENT</b> | <b>Final Assessed Penalty</b> | \$7,050 |
|-----------------------------------|-------------------------------|---------|

|                 |      |                  |                   |     |
|-----------------|------|------------------|-------------------|-----|
| <b>DEFERRAL</b> | 0.0% | <b>Reduction</b> | <b>Adjustment</b> | \$0 |
|-----------------|------|------------------|-------------------|-----|

Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral not offered for non-expedited settlement.

|                        |         |
|------------------------|---------|
| <b>PAYABLE PENALTY</b> | \$7,050 |
|------------------------|---------|

|                                |  |                   |                 |   |
|--------------------------------|--|-------------------|-----------------|---|
| <b>Screening Date</b>          | 13-Apr-2022                                      | <b>Docket No.</b> | 2022-0425-PWS-E | <b>PCW</b>                                  |
| <b>Respondent</b>              | Carol Ann Norra dba Carol Norra Mobile Home Park |                   |                 | <i>Policy Revision 5 (January 28, 2021)</i> |
| <b>Case ID No.</b>             | 62205  |                   |                 | <i>PCW Revision February 11, 2021</i>       |
| <b>Reg. Ent. Reference No.</b> | RN101282572                                      |                   |                 |   |
| <b>Media</b>                   | Public Water Supply                              |                   |                 |   |
| <b>Enf. Coordinator</b>        | Samantha Salas                                   |                   |                 |   |

## Compliance History Worksheet

### >> Compliance History Site Enhancement (Subtotal 2)

| Component                     | Number of...   | Number | Adjust. |
|-------------------------------|--|--------|---------|
| NOVs                          | Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )  | 0      | 0%      |
|                               | Other written NOVs   | 0      | 0%      |
| Orders                        | Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )  | 0      | 0%      |
|                               | Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission | 0      | 0%      |
| Judgments and Consent Decrees | Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )                               | 0      | 0%      |
|                               | Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government  | 0      | 0%      |
| Convictions                   | Any criminal convictions of this state or the federal government ( <i>number of counts</i> )   | 0      | 0%      |
| Emissions                     | Chronic excessive emissions events ( <i>number of events</i> )   | 0      | 0%      |
| Audits                        | Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )     | 0      | 0%      |
|                               | Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )  | 0      | 0%      |
| Other                         | Environmental management systems in place for one year or more   | No     | 0%      |
|                               | Voluntary on-site compliance assessments conducted by the executive director under a special assistance program  | No     | 0%      |
|                               | Participation in a voluntary pollution reduction program   | No     | 0%      |
|                               | Early compliance with, or offer of a product that meets future state or federal government environmental requirements  | No     | 0%      |

**Adjustment Percentage (Subtotal 2)** 0%

### >> Repeat Violator (Subtotal 3)

N/A

**Adjustment Percentage (Subtotal 3)** 0%

### >> Compliance History Person Classification (Subtotal 7)

N/A

**Adjustment Percentage (Subtotal 7)** 0%

### >> Compliance History Summary

**Compliance History Notes**

No adjustment for Compliance History.

**Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)** 0%

### >> Final Compliance History Adjustment

**Final Adjustment Percentage \*capped at 100%** 0%

Screening Date 13-Apr-2022

Docket No. 2022-0425-PWS-E

PCW

Respondent Carol Ann Norra dba Carol Norra Mobile Home Park

Policy Revision 5 (January 28, 2021)

Case ID No. 62205

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN101282572

Media Public Water Supply

Enf. Coordinator Samantha Salas

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 290.46(n)(1)

Violation Description

Failed to maintain at the public water system accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank until the Facility is decommissioned.

Base Penalty \$5,000

## &gt;&gt; Environmental, Property and Human Health Matrix

OR

| Release   | Harm  |          |       |
|-----------|-------|----------|-------|
|           | Major | Moderate | Minor |
| Actual    |       |          |       |
| Potential |       |          |       |

Percent 0.0%

## &gt;&gt; Programmatic Matrix

| Falsification | Major | Moderate | Minor |
|---------------|-------|----------|-------|
|               | x     |          |       |

Percent 10.0%

Matrix Notes

100% of the rule requirements were not met.

Adjustment \$4,500

\$500

## Violation Events

Number of Violation Events 1 70 Number of violation days

|              |   |
|--------------|---|
| daily        |   |
| weekly       |   |
| monthly      |   |
| quarterly    |   |
| semiannual   |   |
| annual       |   |
| single event | x |

Violation Base Penalty \$500

One single event is recommended.

## Good Faith Efforts to Comply

0.0%

Reduction \$0

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

Notes

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

Violation Subtotal \$500

## Economic Benefit (EB) for this violation

## Statutory Limit Test

Estimated EB Amount \$33

Violation Final Penalty Total \$500

This violation Final Assessed Penalty (adjusted for limits) \$500

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 1

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |  |             |             |      |      |     |      |
|--------------------------|--|-------------|-------------|------|------|-----|------|
| Equipment                |  |             |             | 0.00 | \$0  | \$0 | \$0  |
| Buildings                |  |             |             | 0.00 | \$0  | \$0 | \$0  |
| Other (as needed)        |  |             |             | 0.00 | \$0  | \$0 | \$0  |
| Engineering/Construction |  |             |             | 0.00 | \$0  | \$0 | \$0  |
| Land                     |  |             |             | 0.00 | \$0  | n/a | \$0  |
| Record Keeping System    | \$180  | 31-Jul-2020 | 16-Mar-2024 | 3.63 | \$33 | n/a | \$33 |
| Training/Sampling        |  |             |             | 0.00 | \$0  | n/a | \$0  |
| Remediation/Disposal     |  |             |             | 0.00 | \$0  | n/a | \$0  |
| Permit Costs             |  |             |             | 0.00 | \$0  | n/a | \$0  |
| Other (as needed)        |  |             |             | 0.00 | \$0  | n/a | \$0  |
| Notes for DELAYED costs  | The delayed cost includes the estimated amount to maintain at the public water system accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank, calculated from the date of the investigation initially documenting the violation to the estimated date of compliance. |             |             |      |      |     |      |

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Notes for AVOIDED costs       |  |  |  |      |     |     |     |

Approx. Cost of Compliance \$180

**TOTAL** \$33



|   |   |            |
|---|---|------------|
| <b>Screening Date</b> 13-Apr-2022<br><b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park<br><b>Case ID No.</b> 62205<br><b>Reg. Ent. Reference No.</b> RN101282572<br><b>Media</b> Public Water Supply<br><b>Enf. Coordinator</b> Samantha Salas | <b>Docket No.</b> 2022-0425-PWS-E<br><br><b>Policy Revision 5 (January 28, 2021)</b><br><b>PCW Revision February 11, 2021</b> | <b>PCW</b> |
|---|---|------------|

  

|                              |   |  |
|------------------------------|---|--|
| <b>Violation Number</b>      | 2 |  |
| <b>Rule Cite(s)</b>          |   | 30 Tex. Admin. Code § 290.46(f)(2), (f)(3)(A)(i)(III), (f)(3)(A)(ii)(V), (f)(3)(A)(iv), (f)(3)(B)(iv), and (f)(3)(D)(ii)   |
| <b>Violation Description</b> |   | Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request. Specifically, records for the amount of each chemical used each week, the amount of water treated each week, the dates that dead-end mains were flushed, the calibration records for flow meters, and the results of inspections for all water storage and pressure maintenance facilities were not maintained on-site for review. |

  

|                     |         |
|---------------------|---------|
| <b>Base Penalty</b> | \$5,000 |
|---------------------|---------|

  

**>> Environmental, Property and Human Health Matrix**

|           |                |             |          |       |                     |
|-----------|----------------|-------------|----------|-------|---------------------|
| <b>OR</b> |                | <b>Harm</b> |          |       |                     |
|           | <b>Release</b> | Major       | Moderate | Minor |                     |
|           | Actual         |             |          |       | <b>Percent</b> 0.0% |
|           | Potential      |             |          |       |                     |

  

**>> Programmatic Matrix**

|                     |  |  |       |          |       |                     |
|---------------------|--|--|-------|----------|-------|---------------------|
| <b>Matrix Notes</b> |  | Falsification  | Major | Moderate | Minor |                     |
|                     |  |  |       |          | x     | <b>Percent</b> 1.0% |
|                     |  |  |       |          |       |                     |
|                     |  | Less than 30% of the rule requirements were not met. |       |          |       |                     |

  

|                   |         |
|-------------------|---------|
| <b>Adjustment</b> | \$4,950 |
|-------------------|---------|

  

|                   |      |
|-------------------|------|
| <b>Adjustment</b> | \$50 |
|-------------------|------|

  

**Violation Events**

|                            |   |    |                          |
|----------------------------|---|----|--------------------------|
| Number of Violation Events | 1 | 70 | Number of violation days |
|----------------------------|---|----|--------------------------|

  

|  |              |  |   |  |  |  |  |
|--|--------------|--|---|--|--|--|--|
|  | daily        |  |   |  |  |  |  |
|  | weekly       |  |   |  |  |  |  |
|  | monthly      |  |   |  |  |  |  |
|  | quarterly    |  |   |  |  |  |  |
|  | semiannual   |  |   |  |  |  |  |
|  | annual       |  |   |  |  |  |  |
|  | single event |  | x |  |  |  |  |

  

|                                  |  |
|----------------------------------|--|
| One single event is recommended. |  |
|----------------------------------|--|

  

|                                     |      |                  |     |
|-------------------------------------|------|------------------|-----|
| <b>Good Faith Efforts to Comply</b> | 0.0% | <b>Reduction</b> | \$0 |
|-------------------------------------|------|------------------|-----|

  

|              |  |                |                                  |  |  |  |  |
|--------------|--|----------------|----------------------------------|--|--|--|--|
|              |  | Before NOE/NOV | NOE/NOV to EDRP/Settlement Offer |  |  |  |  |
|              | Extraordinary  |                |                                  |  |  |  |  |
|              | Ordinary   |                |                                  |  |  |  |  |
|              | N/A  | x              |                                  |  |  |  |  |
| <b>Notes</b> | The Respondent does not meet the good faith criteria for this violation. |                |                                  |  |  |  |  |

  

|                           |      |
|---------------------------|------|
| <b>Violation Subtotal</b> | \$50 |
|---------------------------|------|

  

**Economic Benefit (EB) for this violation**

|                            |     |                             |
|----------------------------|-----|-----------------------------|
| <b>Estimated EB Amount</b> | \$6 | <b>Statutory Limit Test</b> |
|----------------------------|-----|-----------------------------|

  

|                                      |      |
|--------------------------------------|------|
| <b>Violation Final Penalty Total</b> | \$50 |
|--------------------------------------|------|

  

|  |      |
|--|------|
| <b>This violation Final Assessed Penalty (adjusted for limits)</b> | \$50 |
|--|------|

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 2

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |      |             |             |      |     |     |     |
|--------------------------|------|-------------|-------------|------|-----|-----|-----|
| Equipment                |      |             |             | 0.00 | \$0 | \$0 | \$0 |
| Buildings                |      |             |             | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)        |      |             |             | 0.00 | \$0 | \$0 | \$0 |
| Engineering/Construction |      |             |             | 0.00 | \$0 | \$0 | \$0 |
| Land                     |      |             |             | 0.00 | \$0 | n/a | \$0 |
| Record Keeping System    | \$45 | 15-Mar-2021 | 16-Jan-2024 | 2.84 | \$6 | n/a | \$6 |
| Training/Sampling        |      |             |             | 0.00 | \$0 | n/a | \$0 |
| Remediation/Disposal     |      |             |             | 0.00 | \$0 | n/a | \$0 |
| Permit Costs             |      |             |             | 0.00 | \$0 | n/a | \$0 |
| Other (as needed)        |      |             |             | 0.00 | \$0 | n/a | \$0 |

Notes for DELAYED costs

The delayed cost includes the estimated amount to maintain water system operation and maintenance records and make them immediately available for inspection upon request by the Executive Director, calculated from the date of the investigation initially documenting the violation to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

Notes for AVOIDED costs

Approx. Cost of Compliance

\$45

TOTAL

\$6

|   |  |  |
|---|--|--|
| <b>Screening Date</b> 13-Apr-2022<br><b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park<br><b>Case ID No.</b> 62205<br><b>Reg. Ent. Reference No.</b> RN101282572<br><b>Media</b> Public Water Supply<br><b>Enf. Coordinator</b> Samantha Salas | <b>Docket No.</b> 2022-0425-PWS-E<br><br><b>Base Penalty</b> \$5,000 | <b>PCW</b><br><i>Policy Revision 5 (January 28, 2021)</i><br><i>PCW Revision February 11, 2021</i> |
|---|--|--|

  

|                              |   |   |  |
|------------------------------|---|---|--|
| <b>Violation Number</b>      | 3 | <b>Rule Cite(s)</b>   |  |
|                              |   | 30 Tex. Admin. Code § 290.46(n)(2)  |  |
| <b>Violation Description</b> |   | 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. |  |

  

**Base Penalty** \$5,000

  

**>> Environmental, Property and Human Health Matrix**

|           |                |             |          |       |                     |
|-----------|----------------|-------------|----------|-------|---------------------|
| <b>OR</b> |                | <b>Harm</b> |          |       |                     |
|           | <b>Release</b> | Major       | Moderate | Minor |                     |
|           | Actual         |             |          |       | <b>Percent</b> 0.0% |
|           | Potential      |             |          |       |                     |

  

**>> Programmatic Matrix**

|                     |   |       |          |       |                      |
|---------------------|---|-------|----------|-------|----------------------|
|                     | Falsification                               | Major | Moderate | Minor |                      |
|                     |   | x     |          |       | <b>Percent</b> 10.0% |
| <b>Matrix Notes</b> | 100% of the rule requirements were not met. |       |          |       |                      |

**Adjustment** \$4,500

\$500

  

**Violation Events**

|                            |   |    |                          |
|----------------------------|---|----|--------------------------|
| Number of Violation Events | 1 | 70 | Number of violation days |
|----------------------------|---|----|--------------------------|

|  |              |   |                                     |
|--|--------------|---|-------------------------------------|
|  | daily        |   | <b>Violation Base Penalty</b> \$500 |
|  | weekly       |   |                                     |
|  | monthly      |   |                                     |
|  | quarterly    |   |                                     |
|  | semiannual   |   |                                     |
|  | annual       |   |                                     |
|  | single event | x |                                     |

One single event is recommended.

  

**Good Faith Efforts to Comply**

|               |  |                                   |
|---------------|--|-----------------------------------|
|               | <b>0.0%</b>  |                                   |
|               | Before NOE/NOV   | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |  |                                   |
| Ordinary      |  |                                   |
| N/A           | x  |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

**Violation Subtotal** \$500

  

**Economic Benefit (EB) for this violation**

|                            |      |  |
|----------------------------|------|--|
| <b>Estimated EB Amount</b> | \$26 | <b>Statutory Limit Test</b>  |
|                            |      | <b>Violation Final Penalty Total</b> \$500                               |
|                            |      | <b>This violation Final Assessed Penalty (adjusted for limits)</b> \$500 |

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 3

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |       |             |             |      |      |     |      |
|--------------------------|-------|-------------|-------------|------|------|-----|------|
| Equipment                |       |             |             | 0.00 | \$0  | \$0 | \$0  |
| Buildings                |       |             |             | 0.00 | \$0  | \$0 | \$0  |
| Other (as needed)        |       |             |             | 0.00 | \$0  | \$0 | \$0  |
| Engineering/Construction |       |             |             | 0.00 | \$0  | \$0 | \$0  |
| Land                     |       |             |             | 0.00 | \$0  | n/a | \$0  |
| Record Keeping System    |       |             |             | 0.00 | \$0  | n/a | \$0  |
| Training/Sampling        |       |             |             | 0.00 | \$0  | n/a | \$0  |
| Remediation/Disposal     |       |             |             | 0.00 | \$0  | n/a | \$0  |
| Permit Costs             |       |             |             | 0.00 | \$0  | n/a | \$0  |
| Other (as needed)        | \$180 | 15-Mar-2021 | 16-Jan-2024 | 2.84 | \$26 | n/a | \$26 |

### Notes for DELAYED costs

The delayed cost includes the estimated amount 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, calculated from the date of the investigation initially documenting the violation to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

### Notes for AVOIDED costs

Approx. Cost of Compliance

\$180

**TOTAL**

\$26

|  |   |            |
|--|---|------------|
| <b>Screening Date</b> 13-Apr-2022                                  | <b>Docket No.</b> 2022-0425-PWS-E   | <b>PCW</b> |
| <b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park | Policy Revision 5 (January 28, 2021)  |            |
| <b>Case ID No.</b> 62205   | PCW Revision February 11, 2021  |            |
| <b>Reg. Ent. Reference No.</b> RN101282572                         |   |            |
| <b>Media</b> Public Water Supply                                   |   |            |
| <b>Enf. Coordinator</b> Samantha Salas                             |   |            |
| <b>Violation Number</b>  | 4   |            |
| <b>Rule Cite(s)</b>  | 30 Tex. Admin. Code § 290.121(a) and (b)  |            |
| <b>Violation Description</b>                                       | Failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements. |            |
| <b>Base Penalty</b>  |   | \$5,000    |

**>> Environmental, Property and Human Health Matrix**

|           |           |                |             |       |                |
|-----------|-----------|----------------|-------------|-------|----------------|
| <b>OR</b> |           | <b>Release</b> | <b>Harm</b> |       |                |
|           |           | Major          | Moderate    | Minor |                |
|           | Actual    |                |             |       | <b>Percent</b> |
|           | Potential |                |             |       | 0.0%           |

**>> Programmatic Matrix**

|  |               |       |          |       |                |
|--|---------------|-------|----------|-------|----------------|
|  | Falsification | Major | Moderate | Minor |                |
|  |               | x     |          |       | <b>Percent</b> |
|  |               |       |          |       | 10.0%          |

|                     |   |
|---------------------|---|
| <b>Matrix Notes</b> | 100% of the rule requirements were not met. |
|---------------------|---|

**Adjustment** \$4,500

\$500

**Violation Events**

|                            |   |  |    |                          |
|----------------------------|---|--|----|--------------------------|
| Number of Violation Events | 1 |  | 70 | Number of violation days |
|----------------------------|---|--|----|--------------------------|

|  |              |   |  |
|--|--------------|---|--|
|  | daily        |   |  |
|  | weekly       |   |  |
|  | monthly      |   |  |
|  | quarterly    |   |  |
|  | semiannual   |   |  |
|  | annual       |   |  |
|  | single event | x |  |

|                                  |
|----------------------------------|
| One single event is recommended. |
|----------------------------------|

**Good Faith Efforts to Comply**

|               |                |                                    |
|---------------|----------------|------------------------------------|
|               | <b>0.0%</b>    |                                    |
|               | Before NOE/NOV | NOE/NOV to EDP RP/Settlement Offer |
| Extraordinary |                |                                    |
| Ordinary      |                |                                    |
| N/A           | x              |                                    |

|              |  |
|--------------|--|
| <b>Notes</b> | The Respondent does not meet the good faith criteria for this violation. |
|--------------|--|

**Violation Base Penalty** \$500

**Violation Subtotal** \$500

**Economic Benefit (EB) for this violation**

|                            |      |   |
|----------------------------|------|---|
| <b>Estimated EB Amount</b> | \$18 | <b>Statutory Limit Test</b>   |
|                            |      | <b>Violation Final Penalty Total</b> <span style="border: 1px solid black; padding: 2px 10px;">\$500</span>                               |
|                            |      | <b>This violation Final Assessed Penalty (adjusted for limits)</b> <span style="border: 1px solid black; padding: 2px 10px;">\$500</span> |

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 4

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |       |            |             |      |      |     |      |
|--------------------------|-------|------------|-------------|------|------|-----|------|
| Equipment                |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Buildings                |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Other (as needed)        |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Engineering/Construction |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Land                     |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Record Keeping System    |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Training/Sampling        |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Remediation/Disposal     |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Permit Costs             |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Other (as needed)        | \$180 | 2-Feb-2022 | 15-Feb-2024 | 2.04 | \$18 | n/a | \$18 |

Notes for DELAYED costs

The delayed cost includes the estimated amount to develop and begin maintaining a chemical and microbiological monitoring plan, calculated from the date of the investigation to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

Notes for AVOIDED costs

Approx. Cost of Compliance

\$180

**TOTAL**

\$18

|  |   |            |
|--|---|------------|
| <b>Screening Date</b> 13-Apr-2022                                  | <b>Docket No.</b> 2022-0425-PWS-E   | <b>PCW</b> |
| <b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park | <i>Policy Revision 5 (January 28, 2021)</i>   |            |
| <b>Case ID No.</b> 62205   | <i>PCW Revision February 11, 2021</i>   |            |
| <b>Reg. Ent. Reference No.</b> RN101282572                         |   |            |
| <b>Media</b> Public Water Supply                                   |   |            |
| <b>Enf. Coordinator</b> Samantha Salas                             |   |            |
| <b>Violation Number</b>  | 5   |            |
| <b>Rule Cite(s)</b>  | 30 Tex. Admin. Code § 290.42(l)   |            |
| <b>Violation Description</b>                                       | Failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference. |            |
| <b>Base Penalty</b>  |   | \$5,000    |

**>> Environmental, Property and Human Health Matrix**

|           |                |             |          |       |                     |
|-----------|----------------|-------------|----------|-------|---------------------|
| <b>OR</b> |                | <b>Harm</b> |          |       |                     |
|           | <b>Release</b> | Major       | Moderate | Minor |                     |
|           | Actual         |             |          |       | <b>Percent</b> 0.0% |
|           | Potential      |             |          |       |                     |

**>> Programmatic Matrix**

|                     |   |       |          |       |                      |
|---------------------|---|-------|----------|-------|----------------------|
|                     | Falsification                             | Major | Moderate | Minor |                      |
|                     |   | x     |          |       | <b>Percent</b> 10.0% |
| <b>Matrix Notes</b> | 100% of the rule requirement was not met. |       |          |       |                      |
| <b>Adjustment</b>   |   |       |          |       | \$4,500              |

\$500

**Violation Events**

|                                  |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
|----------------------------------|---|--------------------------|-------|--------|--|---------|--|-----------|--|------------|--|--------|--|--------------|---|--|--|
| Number of Violation Events       | 1   | Number of violation days | 70    |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
|                                  | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td></td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td style="text-align: center;">x</td></tr> </table> | daily                    |       | weekly |  | monthly |  | quarterly |  | semiannual |  | annual |  | single event | x |  |  |
| daily                            |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| weekly                           |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| monthly                          |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| quarterly                        |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| semiannual                       |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| annual                           |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| single event                     | x   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| <b>Violation Base Penalty</b>    |   |                          | \$500 |        |  |         |  |           |  |            |  |        |  |              |   |  |  |
| One single event is recommended. |   |                          |       |        |  |         |  |           |  |            |  |        |  |              |   |  |  |

**Good Faith Efforts to Comply**

|                           |  |                                    |       |
|---------------------------|--|------------------------------------|-------|
|                           | <b>0.0%</b>  |                                    |       |
|                           | Before NOE/NOV   | NOE/NOV to EDP RP/Settlement Offer |       |
| Extraordinary             |  |                                    |       |
| Ordinary                  |  |                                    |       |
| N/A                       | x  |                                    |       |
| Notes                     | The Respondent does not meet the good faith criteria for this violation. |                                    |       |
| <b>Violation Subtotal</b> |  |                                    | \$500 |

**Economic Benefit (EB) for this violation**

|  |                             |
|--|-----------------------------|
|  | <b>Statutory Limit Test</b> |
| <b>Estimated EB Amount</b>   | \$18                        |
| <b>Violation Final Penalty Total</b>                               | \$500                       |
| <b>This violation Final Assessed Penalty (adjusted for limits)</b> |                             |
| \$500  |                             |

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 5

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |       |            |             |      |      |     |      |
|--------------------------|-------|------------|-------------|------|------|-----|------|
| Equipment                |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Buildings                |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Other (as needed)        |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Engineering/Construction |       |            |             | 0.00 | \$0  | \$0 | \$0  |
| Land                     |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Record Keeping System    |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Training/Sampling        |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Remediation/Disposal     |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Permit Costs             |       |            |             | 0.00 | \$0  | n/a | \$0  |
| Other (as needed)        | \$180 | 2-Feb-2022 | 15-Feb-2024 | 2.04 | \$18 | n/a | \$18 |

Notes for DELAYED costs

The delayed cost includes the estimated amount to develop and maintain a thorough and up-to-date plant operations manual, calculated from the date of the investigation to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

Notes for AVOIDED costs

Approx. Cost of Compliance

\$180

**TOTAL**

\$18



|  |   |            |
|--|---|------------|
| <b>Screening Date</b> 13-Apr-2022                                  | <b>Docket No.</b> 2022-0425-PWS-E   | <b>PCW</b> |
| <b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park | <i>Policy Revision 5 (January 28, 2021)</i>   |            |
| <b>Case ID No.</b> 62205   | <i>PCW Revision February 11, 2021</i>   |            |
| <b>Reg. Ent. Reference No.</b> RN101282572                         |   |            |
| <b>Media</b> Public Water Supply                                   |   |            |
| <b>Enf. Coordinator</b> Samantha Salas                             |   |            |
| <b>Violation Number</b>  | 6   |            |
| <b>Rule Cite(s)</b>  | 30 Tex. Admin. Code § 290.45(h)(1)  |            |
| <b>Violation Description</b>                                       | Failed to provide sufficient power to meet the capacity requirements in accordance with the affected utility's approved Emergency Preparedness Plan ("EPP"). Specifically, the Facility's approved EPP indicates the use of a portable generator equipped with a quick-connect system, however, the Facility did not have a quick-connect system installed. |            |
| <b>Base Penalty</b>  |   | \$5,000    |

**>> Environmental, Property and Human Health Matrix**

|           |                |             |          |       |  |
|-----------|----------------|-------------|----------|-------|--|
| <b>OR</b> |                | <b>Harm</b> |          |       |  |
|           | <b>Release</b> | Major       | Moderate | Minor |  |
|           | Actual         |             |          |       | <b>Percent</b> <span style="border: 1px solid blue; padding: 0 10px;">15.0%</span> |
|           | Potential      | x           |          |       |  |

**>> Programmatic Matrix**

|                     |  |       |          |       |   |
|---------------------|--|-------|----------|-------|---|
|                     | Falsification  | Major | Moderate | Minor |   |
|                     |  |       |          |       | <b>Percent</b> <span style="border: 1px solid blue; padding: 0 10px;">0.0%</span> |
| <b>Matrix Notes</b> | Failure to provide emergency power could cause water outages and expose persons served by the Facility to contaminants which would exceed levels protective of human health. |       |          |       |   |

**Adjustment** \$4,250

\$750

**Violation Events**

|                            |   |  |    |                          |
|----------------------------|---|--|----|--------------------------|
| Number of Violation Events | 3 |  | 70 | Number of violation days |
|----------------------------|---|--|----|--------------------------|

|  |              |   |   |
|--|--------------|---|---|
|  | daily        |   | <b>Violation Base Penalty</b> <span style="border: 1px solid blue; padding: 0 10px;">\$2,250</span> |
|  | weekly       |   |   |
|  | monthly      | x |   |
|  | quarterly    |   |   |
|  | semiannual   |   |   |
|  | annual       |   |   |
|  | single event |   |   |

Three monthly events are recommended, calculated from the date of the investigation, February 2, 2022, to the date of screening, April 13, 2022.

**Good Faith Efforts to Comply**

|               |  |   |                  |     |
|---------------|--|---|------------------|-----|
|               | <b>0.0%</b>  |   | <b>Reduction</b> | \$0 |
|               | <small>Before NOE/NOV</small>  | <small>NOE/NOV to EDRP/Settlement Offer</small> |                  |     |
| Extraordinary |  |   |                  |     |
| Ordinary      |  |   |                  |     |
| N/A           | x  |   |                  |     |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |   |                  |     |

**Violation Subtotal** \$2,250

**Economic Benefit (EB) for this violation**

|                            |       |  |
|----------------------------|-------|--|
| <b>Estimated EB Amount</b> | \$741 | <b>Statutory Limit Test</b>  |
|                            |       | <b>Violation Final Penalty Total</b> <span style="border: 1px solid blue; text-align: right;">\$2,250</span>                               |
|                            |       | <b>This violation Final Assessed Penalty (adjusted for limits)</b> <span style="border: 1px solid blue; text-align: right;">\$2,250</span> |

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 6

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |         |            |             |      |      |       |       |
|--------------------------|---------|------------|-------------|------|------|-------|-------|
| Equipment                |         |            |             | 0.00 | \$0  | \$0   | \$0   |
| Buildings                |         |            |             | 0.00 | \$0  | \$0   | \$0   |
| Other (as needed)        |         |            |             | 0.00 | \$0  | \$0   | \$0   |
| Engineering/Construction | \$5,000 | 2-Feb-2022 | 16-Mar-2024 | 2.12 | \$35 | \$706 | \$741 |
| Land                     |         |            |             | 0.00 | \$0  | n/a   | \$0   |
| Record Keeping System    |         |            |             | 0.00 | \$0  | n/a   | \$0   |
| Training/Sampling        |         |            |             | 0.00 | \$0  | n/a   | \$0   |
| Remediation/Disposal     |         |            |             | 0.00 | \$0  | n/a   | \$0   |
| Permit Costs             |         |            |             | 0.00 | \$0  | n/a   | \$0   |
| Other (as needed)        |         |            |             | 0.00 | \$0  | n/a   | \$0   |

**Notes for DELAYED costs**

The delayed cost includes the estimated amount to provide a quick-connect system which provides sufficient power to meet the capacity requirements in accordance with the affected utility's approved EPP, calculated from the date of the investigation to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

**Notes for AVOIDED costs**

**Approx. Cost of Compliance**

\$5,000

**TOTAL**

\$741

|   |   |
|---|---|
| <b>Screening Date</b> 13-Apr-2022<br><b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park<br><b>Case ID No.</b> 62205<br><b>Reg. Ent. Reference No.</b> RN101282572<br><b>Media</b> Public Water Supply<br><b>Enf. Coordinator</b> Samantha Salas | <b>Docket No.</b> 2022-0425-PWS-E<br><br><b>PCW</b><br><i>Policy Revision 5 (January 28, 2021)</i><br><i>PCW Revision February 11, 2021</i> |
|---|---|

  

|                              |  |  |  |  |  |  |  |         |  |
|------------------------------|--|--|--|--|--|--|--|---------|--|
| <b>Violation Number</b>      | 7  |  |  |  |  |  |  |         |  |
| <b>Rule Cite(s)</b>          | 30 Tex. Admin. Code § 290.46(v)  |  |  |  |  |  |  |         |  |
| <b>Violation Description</b> | Failed to ensure that the electrical wiring is securely installed in compliance with a local or national electrical code. Specifically, the electrical wiring in the well house and inside the pressure tank housing coming from the electrical box was not correctly installed in compliance with a local or national electrical code. In addition, on the sodium hypochlorite injection pump wiring, the conductive material was not completely sheathed in insulation and encased in an outer, temperature-resistant, protective layer. |  |  |  |  |  |  |         |  |
| <b>Base Penalty</b>          |  |  |  |  |  |  |  | \$5,000 |  |

  

**>> Environmental, Property and Human Health Matrix**

|           |                |       |          |       |                |       |
|-----------|----------------|-------|----------|-------|----------------|-------|
| <b>OR</b> | <b>Harm</b>    |       |          |       |                |       |
|           |                | Major | Moderate | Minor |                |       |
|           | <b>Release</b> |       |          |       |                |       |
|           | Actual         |       |          |       |                |       |
|           | Potential      | x     |          |       | <b>Percent</b> | 15.0% |

  

**>> Programmatic Matrix**

|  |                      |       |          |       |                |      |
|--|----------------------|-------|----------|-------|----------------|------|
|  | <b>Falsification</b> |       |          |       |                |      |
|  |                      | Major | Moderate | Minor |                |      |
|  |                      |       |          |       |                |      |
|  |                      |       |          |       |                |      |
|  |                      |       |          |       | <b>Percent</b> | 0.0% |

  

|              |  |
|--------------|--|
| Matrix Notes | Failure to ensure all electrical wiring is installed in compliance with a local or national code could cause equipment malfunctions resulting in low pressure or outages which could expose persons served by the Facility to contaminants which would exceed levels protective of human health. |
|--------------|--|

  

|                   |         |
|-------------------|---------|
| <b>Adjustment</b> | \$4,250 |
| \$750             |         |

  

**Violation Events**

|                            |   |    |                          |
|----------------------------|---|----|--------------------------|
| Number of Violation Events | 3 | 70 | Number of violation days |
|----------------------------|---|----|--------------------------|

  

|  |              |   |  |  |  |  |  |
|--|--------------|---|--|--|--|--|--|
|  | daily        |   |  |  |  |  |  |
|  | weekly       |   |  |  |  |  |  |
|  | monthly      | x |  |  |  |  |  |
|  | quarterly    |   |  |  |  |  |  |
|  | semiannual   |   |  |  |  |  |  |
|  | annual       |   |  |  |  |  |  |
|  | single event |   |  |  |  |  |  |

  

|                               |         |
|-------------------------------|---------|
| <b>Violation Base Penalty</b> | \$2,250 |
|-------------------------------|---------|

  

|  |
|--|
| Three monthly events are recommended, calculated from the date of the investigation, February 2, 2022, to the date of screening, April 13, 2022. |
|--|

  

**Good Faith Efforts to Comply**

|  |             |                  |
|--|-------------|------------------|
|  | <b>0.0%</b> |                  |
|  |             | <b>Reduction</b> |
|  |             | \$0              |

  

|               |  |                                  |  |
|---------------|--|----------------------------------|--|
|               | Before NOE/NOV   | NOE/NOV to EDRP/Settlement Offer |  |
| Extraordinary |  |                                  |  |
| Ordinary      |  |                                  |  |
| N/A           | x  |                                  |  |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                  |  |

  

|                           |         |
|---------------------------|---------|
| <b>Violation Subtotal</b> | \$2,250 |
|---------------------------|---------|

  

**Economic Benefit (EB) for this violation**

|  |      |  |  |         |  |  |
|--|------|--|--|---------|--|--|
| <b>Estimated EB Amount</b>   | \$27 |  |  |         |  |  |
| <b>Statutory Limit Test</b>  |      |  |  |         |  |  |
| <b>Violation Final Penalty Total</b>                               |      |  |  | \$2,250 |  |  |
| <b>This violation Final Assessed Penalty (adjusted for limits)</b> |      |  |  | \$2,250 |  |  |

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 7

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |       |            |             |      |     |      |      |
|--------------------------|-------|------------|-------------|------|-----|------|------|
| Equipment                |       |            |             | 0.00 | \$0 | \$0  | \$0  |
| Buildings                |       |            |             | 0.00 | \$0 | \$0  | \$0  |
| Other (as needed)        | \$200 | 2-Feb-2022 | 16-Jan-2024 | 1.95 | \$1 | \$26 | \$27 |
| Engineering/Construction |       |            |             | 0.00 | \$0 | \$0  | \$0  |
| Land                     |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Record Keeping System    |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Training/Sampling        |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Remediation/Disposal     |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Permit Costs             |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Other (as needed)        |       |            |             | 0.00 | \$0 | n/a  | \$0  |

### Notes for DELAYED costs

The delayed cost includes the estimated amount to secure all electrical wiring in compliance with a local or national code for the well house, pressure tank housing, and sodium hypochlorite injection pump, calculated from the date of the investigation to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

### Notes for AVOIDED costs

Approx. Cost of Compliance

\$200

**TOTAL**

\$27

|   |  |  |
|---|--|--|
| <b>Screening Date</b> 13-Apr-2022<br><b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park<br><b>Case ID No.</b> 62205<br><b>Reg. Ent. Reference No.</b> RN101282572<br><b>Media</b> Public Water Supply<br><b>Enf. Coordinator</b> Samantha Salas | <b>Docket No.</b> 2022-0425-PWS-E<br><br><b>Base Penalty</b> \$5,000 | <b>PCW</b><br><i>Policy Revision 5 (January 28, 2021)</i><br><i>PCW Revision February 11, 2021</i> |
|---|--|--|

  

|                              |  |  |  |  |  |  |  |  |
|------------------------------|--|--|--|--|--|--|--|--|
| <b>Violation Number</b>      | 8  |  |  |  |  |  |  |  |
| <b>Rule Cite(s)</b>          | 30 Tex. Admin. Code § 290.41(c)(3)(K)  |  |  |  |  |  |  |  |
| <b>Violation Description</b> | Failed to seal the wellhead by a gasket or sealing compound and provide a well casing vent for the well that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated, and located so as to minimize the drawing of contaminants into the well. Specifically, the well casing vent was not covered with 16-mesh or finer corrosion-resistant screen. |  |  |  |  |  |  |  |

  

|                     |  |  |  |         |
|---------------------|--|--|--|---------|
| <b>Base Penalty</b> |  |  |  | \$5,000 |
|---------------------|--|--|--|---------|

  

**>> Environmental, Property and Human Health Matrix**

|           |                |                      |                      |                      |                |      |
|-----------|----------------|----------------------|----------------------|----------------------|----------------|------|
| <b>OR</b> | <b>Harm</b>    |                      |                      |                      |                |      |
|           | <b>Release</b> | Major                | Moderate             | Minor                |                |      |
|           | Actual         | <input type="text"/> | <input type="text"/> | <input type="text"/> |                |      |
|           | Potential      | <input type="text"/> | x                    | <input type="text"/> |                |      |
|           |                |                      |                      |                      | <b>Percent</b> | 5.0% |

  

**>> Programmatic Matrix**

|                     |                      |                      |                      |                      |                |      |
|---------------------|----------------------|----------------------|----------------------|----------------------|----------------|------|
| <b>Matrix Notes</b> | <b>Falsification</b> | Major                | Moderate             | Minor                |                |      |
|                     | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |                |      |
|                     |                      |                      |                      |                      |                |      |
|                     |                      |                      |                      |                      |                |      |
|                     |                      |                      |                      |                      | <b>Percent</b> | 0.0% |

  

|  |                   |         |
|--|-------------------|---------|
|  | <b>Adjustment</b> | \$4,750 |
|--|-------------------|---------|

  

|  |       |
|--|-------|
|  | \$250 |
|--|-------|

  

**Violation Events**

|                            |   |    |                          |
|----------------------------|---|----|--------------------------|
| Number of Violation Events | 1 | 70 | Number of violation days |
|----------------------------|---|----|--------------------------|

  

|  |              |                      |  |
|--|--------------|----------------------|--|
|  | daily        | <input type="text"/> |  |
|  | weekly       | <input type="text"/> |  |
|  | monthly      | <input type="text"/> |  |
|  | quarterly    | x                    |  |
|  | semiannual   | <input type="text"/> |  |
|  | annual       | <input type="text"/> |  |
|  | single event | <input type="text"/> |  |

  

|  |                               |       |
|--|-------------------------------|-------|
|  | <b>Violation Base Penalty</b> | \$250 |
|--|-------------------------------|-------|

  

|  |  |
|--|--|
| One quarterly event is recommended, calculated from the date of the investigation, February 2, 2022, to the date of screening, April 13, 2022. |  |
|--|--|

  

**Good Faith Efforts to Comply**

|               |  |                                   |
|---------------|--|-----------------------------------|
|               | 0.0%   |                                   |
|               | Before NOE/NOV   | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary | <input type="text"/>   | <input type="text"/>              |
| Ordinary      | <input type="text"/>   | <input type="text"/>              |
| N/A           | x  | <input type="text"/>              |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|  |                           |       |
|--|---------------------------|-------|
|  | <b>Violation Subtotal</b> | \$250 |
|--|---------------------------|-------|

  

**Economic Benefit (EB) for this violation**

|                            |      |                                      |
|----------------------------|------|--------------------------------------|
|                            | \$22 |                                      |
| <b>Estimated EB Amount</b> |      | <b>Violation Final Penalty Total</b> |
|                            |      | \$250                                |

  

|  |  |       |
|--|--|-------|
|  | <b>This violation Final Assessed Penalty (adjusted for limits)</b> | \$250 |
|--|--|-------|

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 8

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |       |            |             |      |     |      |      |
|--------------------------|-------|------------|-------------|------|-----|------|------|
| Equipment                | \$150 | 2-Feb-2022 | 16-Mar-2024 | 2.12 | \$1 | \$21 | \$22 |
| Buildings                |       |            |             | 0.00 | \$0 | \$0  | \$0  |
| Other (as needed)        |       |            |             | 0.00 | \$0 | \$0  | \$0  |
| Engineering/Construction |       |            |             | 0.00 | \$0 | \$0  | \$0  |
| Land                     |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Record Keeping System    |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Training/Sampling        |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Remediation/Disposal     |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Permit Costs             |       |            |             | 0.00 | \$0 | n/a  | \$0  |
| Other (as needed)        |       |            |             | 0.00 | \$0 | n/a  | \$0  |

### Notes for DELAYED costs

The delayed cost includes the estimated amount to provide a 16-mesh or finer corrosion-resistant screen for the well casing vent, calculated from the date of the investigation to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

### Notes for AVOIDED costs

Approx. Cost of Compliance

\$150

**TOTAL**

\$22

|  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
|--|--|--|--|--|----------|----------|--|--|--|--|--|-----------|--|---|--|---|
| <b>Screening Date</b> 13-Apr-2022<br><b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park<br><b>Case ID No.</b> 62205<br><b>Reg. Ent. Reference No.</b> RN101282572<br><b>Media</b> Public Water Supply<br><b>Enf. Coordinator</b> Samantha Salas  | <b>Docket No.</b> 2022-0425-PWS-E<br><br><b>Policy Revision 5 (January 28, 2021)</b><br><b>PCW Revision February 11, 2021</b>  | <b>PCW</b>   |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Violation Number</b> <span style="border: 1px solid black; padding: 2px;">9</span>  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Rule Cite(s)</b> <span style="border: 1px solid black; padding: 2px;">30 Tex. Admin. Code §§ 290.41(c)(3)(O) and 290.43(e)</span>   |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Violation Description</b> <span style="border: 1px solid black; padding: 5px;">         Failed to provide an intruder-resistant fence or well house around each well unit, potable water storage tank, and pressure maintenance facility that remains locked during periods of darkness and when the Facility is unattended. Specifically, the well house was not locked or bolted down. Additionally, the door to the housing for the pressure tanks was unlocked and there was a handwritten sign on the inside of the door reading "Do not close or lock".       </span>   |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Base Penalty</b>  |  | <span style="border: 1px solid black; padding: 2px;">\$5,000</span>                              |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>&gt;&gt; Environmental, Property and Human Health Matrix</b>  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>OR</b>  | <b>Harm</b><br><table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"><b>Release</b></td> <td style="width: 33%; text-align: center;">Major</td> <td style="width: 33%; text-align: center;">Moderate</td> <td style="width: 33%; text-align: center;">Minor</td> </tr> <tr> <td>Actual</td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> </tr> <tr> <td>Potential</td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> <td style="text-align: center;">x</td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> </tr> </table> |  |  | <b>Release</b>   | Major    | Moderate | Minor  | Actual   | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | Potential | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | x | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <b>Percent</b> <span style="border: 1px solid black; padding: 2px;">5.0%</span> |
|  | <b>Release</b>   | Major  | Moderate   | Minor  |          |          |  |  |  |  |  |           |  |   |  |   |
|  | Actual   | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> |          |          |  |  |  |  |  |           |  |   |  |   |
|  | Potential  | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | x  | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>&gt;&gt; Programmatic Matrix</b>  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"><b>Falsification</b></td> <td style="width: 33%; text-align: center;">Major</td> <td style="width: 33%; text-align: center;">Moderate</td> <td style="width: 33%; text-align: center;">Minor</td> </tr> <tr> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> <td><span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span></td> </tr> </table> |  |  | <b>Falsification</b>   | Major  | Moderate | Minor    | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <b>Percent</b> <span style="border: 1px solid black; padding: 2px;">0.0%</span>                  |           |  |   |  |   |
| <b>Falsification</b>   | Major  | Moderate   | Minor  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span>   | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span>   | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Matrix Notes</b>  | Failure to provide an intruder-resistant fence or lockable well house could result in contamination of the facilities by trespassers exposing persons served by the Facility to a significant amount of contaminants that would not exceed levels protective of human health.  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Adjustment</b>  |  | <span style="border: 1px solid black; padding: 2px;">\$4,750</span>                              |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
|  |  | <span style="border: 1px solid black; padding: 2px;">\$250</span>                                |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Violation Events</b>  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| Number of Violation Events <span style="border: 1px solid black; padding: 2px;">1</span>   |  | Number of violation days <span style="border: 1px solid black; padding: 2px;">70</span>          |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
|  | daily <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span><br>weekly <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span><br>monthly <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span><br>quarterly <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span><br>semiannual <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span><br>annual <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span><br>single event <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span>   | <b>Violation Base Penalty</b> <span style="border: 1px solid black; padding: 2px;">\$250</span>  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| One quarterly event is recommended, calculated from the date of the investigation, February 2, 2022, to the date of screening, April 13, 2022.   |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Good Faith Efforts to Comply</b>  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>0.0%</b>  |  | <b>Reduction</b> <span style="border: 1px solid black; padding: 2px;">\$0</span>                 |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| Before NOE/NOV    NOE/NOV to EDPRP/Settlement Offer  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| Extraordinary  | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span>   | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| Ordinary   | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span>   | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| N/A  | x  | <span style="border: 1px solid black; display: inline-block; width: 50px; height: 15px;"></span> |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| Notes  | The Respondent does not meet the good faith criteria for this violation.   |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Violation Subtotal</b>  |  | <span style="border: 1px solid black; padding: 2px;">\$250</span>                                |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Economic Benefit (EB) for this violation</b>  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Estimated EB Amount</b>   |  | <span style="border: 1px solid black; padding: 2px;">\$32</span>                                 |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Statutory Limit Test</b>  |  |  |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>Violation Final Penalty Total</b>   |  | <span style="border: 1px solid black; padding: 2px;">\$250</span>                                |  |  |          |          |  |  |  |  |  |           |  |   |  |   |
| <b>This violation Final Assessed Penalty (adjusted for limits)</b>   |  | <span style="border: 1px solid black; padding: 2px;">\$250</span>                                |  |  |          |          |  |  |  |  |  |           |  |   |  |   |

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 9

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

|                          |       |            |             |      |      |      |      |
|--------------------------|-------|------------|-------------|------|------|------|------|
| Equipment                |       |            |             | 0.00 | \$0  | \$0  | \$0  |
| Buildings                |       |            |             | 0.00 | \$0  | \$0  | \$0  |
| Other (as needed)        | \$150 | 2-Feb-2022 | 16-Mar-2024 | 2.12 | \$1  | \$21 | \$22 |
| Engineering/Construction |       |            |             | 0.00 | \$0  | \$0  | \$0  |
| Land                     |       |            |             | 0.00 | \$0  | n/a  | \$0  |
| Record Keeping System    |       |            |             | 0.00 | \$0  | n/a  | \$0  |
| Training/Sampling        | \$100 | 2-Feb-2022 | 16-Jan-2024 | 1.95 | \$10 | n/a  | \$10 |
| Remediation/Disposal     |       |            |             | 0.00 | \$0  | n/a  | \$0  |
| Permit Costs             |       |            |             | 0.00 | \$0  | n/a  | \$0  |
| Other (as needed)        |       |            |             | 0.00 | \$0  | n/a  | \$0  |

### Notes for DELAYED costs

The other (as needed) delayed cost includes the estimated amount to lock and bolt down the well house and lock the housing for the pressure tanks, calculated from the date of the investigation to the estimated date of compliance.

The training/sampling delayed cost includes the estimated amount to reinforce existing procedures to ensure that all housing that protects each well unit, potable water storage tank, and pressure maintenance facility is kept locked while unattended, calculated from the investigation date to the estimated date of compliance.

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

### Notes for AVOIDED costs

Approx. Cost of Compliance

\$250

**TOTAL**

\$32



|  |   |            |
|--|---|------------|
| <b>Screening Date</b> 13-Apr-2022                                  | <b>Docket No.</b> 2022-0425-PWS-E           | <b>PCW</b> |
| <b>Respondent</b> Carol Ann Norra dba Carol Norra Mobile Home Park | <i>Policy Revision 5 (January 28, 2021)</i> |            |
| <b>Case ID No.</b> 62205   | <i>PCW Revision February 11, 2021</i>       |            |
| <b>Reg. Ent. Reference No.</b> RN101282572                         |   |            |
| <b>Media</b> Public Water Supply                                   |   |            |
| <b>Enf. Coordinator</b> Samantha Salas                             |   |            |
| <b>Violation Number</b>  | <b>Base Penalty</b>                         |            |
| <b>Rule Cite(s)</b>  | <b>\$5,000</b>                              |            |
| <b>Violation Description</b>                                       |   |            |

30 Tex. Admin. Code § 290.51(a)(6) and Tex. Water Code § 5.702

Failed to pay annual Public Health Service fees and/or any associated late fees for TCEQ Financial Administration Account No. 91011926 for Fiscal Years 2022 and 2023.

**Base Penalty** \$5,000

**>> Environmental, Property and Human Health Matrix**

OR

|                | Major | Moderate | Minor |  |
|----------------|-------|----------|-------|--|
| <b>Release</b> |       |          |       |  |
| Actual         |       |          |       |  |
| Potential      |       |          |       |  |

**Percent** 0.0%

**>> Programmatic Matrix**

OR

|                      | Major | Moderate | Minor |  |
|----------------------|-------|----------|-------|--|
| <b>Falsification</b> |       |          |       |  |
|                      |       |          |       |  |

**Percent** 0.0%

Matrix Notes

**Adjustment** \$5,000

\$0

**Violation Events**

Number of Violation Events

Number of violation days

daily  
weekly  
monthly  
quarterly  
semiannual  
annual  
single event

|  |
|--|
|  |
|  |
|  |
|  |
|  |
|  |
|  |

**Violation Base Penalty** \$0

All penalties and fees will be determined by the Financial Administration Division at the next billing cycle. ☐

**Good Faith Efforts to Comply**

**0.0%**

**Reduction** \$0

Extraordinary  
Ordinary  
N/A  
Notes

|               | Before NOE/NOV | NOE/NOV to EDRP/Settlement Offer |
|---------------|----------------|----------------------------------|
| Extraordinary |                |                                  |
| Ordinary      |                |                                  |
| N/A           | x              |                                  |

**Violation Subtotal** \$0

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

**Economic Benefit (EB) for this violation**

**Estimated EB Amount** \$0

**Statutory Limit Test**

**Violation Final Penalty Total** \$0

**This violation Final Assessed Penalty (adjusted for limits)** \$0

# Economic Benefit Worksheet

**Respondent** Carol Ann Norra dba Carol Norra Mobile Home Park  
**Case ID No.** 62205  
**Reg. Ent. Reference No.** RN101282572  
**Media** Public Water Supply  
**Violation No.** 10

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

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

## Delayed Costs

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

Notes for DELAYED costs

N/A

## Avoided Costs

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

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

Notes for AVOIDED costs

N/A

Approx. Cost of Compliance

\$0

**TOTAL**

\$0



# Compliance History Report

Compliance History Report for CN600708515, RN101282572, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

**Customer, Respondent, or Owner/Operator:** CN600708515, NORRA, CAROL ANN

**Classification:** NOT APPLICABLE

**Rating:** N/A

**Regulated Entity:** RN101282572, CAROL NORRA MOBILE HOME PARK

**Classification:** NOT APPLICABLE

**Rating:** N/A

**Complexity Points:** N/A

**Repeat Violator:** N/A

**CH Group:** 14 - Other

**Location:** 205 REIDLAND ROAD NEAR CROSBY, HARRIS COUNTY, TEXAS

**TCEQ Region:** REGION 12 - HOUSTON

**ID Number(s):**

**PUBLIC WATER SYSTEM/SUPPLY REGISTRATION** 1011926

**Compliance History Period:** September 01, 2017 to August 31, 2022

**Rating Year:** 2022

**Rating Date:** 09/01/2022

**Date Compliance History Report Prepared:** June 30, 2023

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** June 30, 2018 to June 30, 2023

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

**Name:** Samantha Salas

**Phone:** (512) 239-1543

## Site and Owner/Operator History:

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

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

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

N/A

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

N/A

### **C. Chronic excessive emissions events:**

N/A

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

N/A

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

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

N/A

### **F. Environmental audits:**

N/A

### **G. Type of environmental management systems (EMSs):**

N/A

**H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
CAROL ANN NORRA DBA CAROL  
NORRA MOBILE HOME PARK;  
RN101282572

§  
§  
§  
§  
§  
§

BEFORE THE  
  
TEXAS COMMISSION ON  
  
ENVIRONMENTAL QUALITY

## DEFAULT ORDER

DOCKET NO. 2022-0425-PWS-E

On \_\_\_\_\_, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered the Executive Director's Preliminary Report and Petition, filed pursuant to TEX. HEALTH & SAFETY CODE ch. 341, TEX. WATER CODE ch. 5, and the rules of the TCEQ, which requests appropriate relief, including the imposition of an administrative penalty and corrective action of the respondent(s). The respondent made the subject of this Order is Carol Ann Norra dba Carol Norra Mobile Home Park ("Respondent").

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

### FINDINGS OF FACT

1. Respondent owns and operates a public water system ("PWS") located at 205 Reidland Road near Crosby, Harris County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 21 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a PWS as defined in 30 TEX. ADMIN. CODE § 290.38(71).
2. During an investigation conducted on February 2, 2022, an investigator documented that Respondent:
  - a. Failed to maintain at the PWS accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank until the Facility is decommissioned;
  - b. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request. Specifically, records for the amount of each chemical used each week, the amount of water treated each week, the dates that dead-end mains were flushed, the calibration records for flow meters, and the results of inspections for all water storage and pressure maintenance facilities were not maintained on-site for review;
  - c. 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;
  - d. Failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements;
  - e. Failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference;

- f. Failed to provide sufficient power to meet the capacity requirements in accordance with the affected utility's approved Emergency Preparedness Plan ("EPP"). Specifically, the Facility's approved EPP indicates the use of a portable generator equipped with a quick-connect system, however, the Facility did not have a quick-connect system installed;
  - g. Failed to ensure that the electrical wiring is securely installed in compliance with a local or national electrical code. Specifically, the electrical wiring in the well house and inside the pressure tank housing coming from the electrical box was not correctly installed in compliance with a local or national electrical code. In addition, on the sodium hypochlorite injection pump wiring, the conductive material was not completely sheathed in insulation and encased in an outer, temperature-resistant, protective layer;
  - h. Failed to seal the wellhead by a gasket or sealing compound and provide a well casing vent for the well that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated, and located so as to minimize the drawing of contaminants into the well. Specifically, the well casing vent was not covered with 16-mesh or finer corrosion-resistant screen; and
  - i. Failed to provide an intruder-resistant fence or well house around each well unit, potable water storage tank, and pressure maintenance facility that remains locked during periods of darkness and when the Facility is unattended. Specifically, the well house was not locked or bolted down. Additionally, the door to the housing for the pressure tanks was unlocked and there was a handwritten sign on the inside of the door reading "Do not close or lock".
3. During a record review conducted on June 30, 2023, an investigator documented that Respondent failed to pay annual Public Health Service fees and/or any associated late fees for TCEQ Financial Administration Account No. 91011926 for Fiscal Years 2022 and 2023.
4. The Executive Director filed the "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of Carol Ann Norra dba Carol Norra Mobile Home Park" (the "EDPRP") in the TCEQ Chief Clerk's office on January 19, 2024.
5. The EDPRP was mailed to Respondent's last known address on January 19, 2024, via certified mail, return receipt requested, postage prepaid. The United States Postal Service returned the EDPRP sent by certified mail as "unclaimed."
6. The Executive Director re-filed the EDPRP in the TCEQ Chief Clerk's office on March 7, 2024.
7. By letter dated March 7, 2024, sent to Respondent's last known address via certified mail, return receipt requested, and via first class mail, postage prepaid, the Executive Director served Respondent with notice of the EDPRP. The United States Postal Service returned the EDPRP sent by certified mail as "unclaimed." The first class mail has not been returned, indicating that Respondent received notice of the EDPRP.
8. More than 20 days have elapsed since Respondent received notice of the EDPRP. Respondent failed to file an answer and failed to request a hearing.

#### CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341, TEX. WATER CODE ch. 5, and the rules of the TCEQ.

2. As evidenced by Finding of Fact No. 2.a., Respondent failed to maintain at the PWS accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank until the Facility is decommissioned, in violation of 30 TEX. ADMIN. CODE § 290.46(n)(1).
3. As evidenced by Finding of Fact No. 2.b., 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), (f)(3)(A)(i)(III), (f)(3)(A)(ii)(V), (f)(3)(A)(iv), (f)(3)(B)(iv), and (f)(3)(D)(ii).
4. As evidenced by Finding of Fact No. 2.c., Respondent failed to make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in violation of 30 TEX. ADMIN. CODE § 290.46(n)(2).
5. As evidenced by Finding of Fact No. 2.d., Respondent failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements, in violation of 30 TEX. ADMIN. CODE § 290.121(a) and (b).
6. As evidenced by Finding of Fact No. 2.e., Respondent failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference, in violation of 30 TEX. ADMIN. CODE § 290.42(l).
7. As evidenced by Finding of Fact No. 2.f., Respondent failed to provide sufficient power to meet the capacity requirements in accordance with the affected utility's approved EPP, in violation of 30 TEX. ADMIN. CODE § 290.45(h)(1).
8. As evidenced by Finding of Fact No. 2.g., 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).
9. As evidenced by Finding of Fact No. 2.h., Respondent failed to seal the wellhead by a gasket or sealing compound and provide a well casing vent for the well that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated, and located so as to minimize the drawing of contaminants into the well, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(3)(K).
10. As evidenced by Finding of Fact No. 2.i., Respondent failed to provide an intruder-resistant fence or well house around each well unit, potable water storage tank, and pressure maintenance facility that remains locked during periods of darkness and when the Facility is unattended, in violation of 30 TEX. ADMIN. CODE §§ 290.41(c)(3)(O) and 290.43(e).
11. As evidenced by Finding of Fact No. 3, Respondent failed to pay annual Public Health Service fees and/or any associated late fees for TCEQ Financial Administration Account No. 91011926, in violation of TEX. WATER CODE § 5.702 and 30 TEX. ADMIN. CODE § 290.51(a)(6).
12. As evidenced by Findings of Fact Nos. 4 through 7, the Executive Director timely served Respondent with proper notice of the EDPRP, as required by TEX. HEALTH & SAFETY CODE § 341.049 and 30 TEX. ADMIN. CODE § 70.104(c)(2).
13. As evidenced by Finding of Fact No. 8, Respondent failed to file a timely answer as required by TEX. HEALTH & SAFETY CODE § 341.049 and 30 TEX. ADMIN. CODE § 70.105. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049 and 30 TEX. ADMIN. CODE § 70.106, the Commission may enter a Default Order against Respondent and assess the penalty recommended by the Executive Director.
14. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049(a), the Commission has the authority to assess an administrative penalty against Respondent for violations of state statutes within TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.

15. An administrative penalty in the amount of \$7,050 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.
16. TEX. WATER CODE §§ 5.102 and 7.002 authorize the Commission to issue orders and make determinations necessary to effectuate the purposes of the statutes within its jurisdiction.

#### ORDERING PROVISIONS

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

1. Respondent is assessed an administrative penalty in the amount of \$7,050 for violations of state statutes and rules of the TCEQ. The payment of this penalty and Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations which are not raised here.
2. The penalty assessed by this Order shall be paid within 30 days after the effective date of this Order. All checks submitted to pay the penalty imposed by this Order shall be made out to TCEQ and shall be sent with the notation "Re: Carol Ann Norra dba Carol Norra Mobile Home Park; Docket No. 2022-0425-PWS-E" to:  

Financial Administration Division  
Revenue Operations Section  
Texas Commission on Environmental Quality  
Attention: Cashier's Office, MC 214  
P.O. Box 13088  
Austin, Texas 78711-3088
3. Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Order:
    - i. Compile and maintain properly completed water works operation and maintenance records, including but not limited to records for the amount of each chemical used each week, the amount of water treated each week, the dates that dead-end mains were flushed, the calibration records for flow meters, and the results of inspections for all water storage and pressure maintenance facilities, in accordance with 30 TEX. ADMIN. CODE § 290.46;
    - ii. Make available an accurate and up-to-date map of the distribution system so that valves and mains can be easily located during emergencies, in accordance with 30 TEX. ADMIN. CODE § 290.46;
    - iii. Secure all electrical wiring in compliance with a local or national code for the well house, pressure tank housing, and sodium hypochlorite injection pump, in accordance with 30 TEX. ADMIN. CODE § 290.46;
    - iv. Conduct employee training to reinforce existing procedures to ensure that all housing that protects each well unit, potable water storage tank, and pressure maintenance facility is kept locked while unattended, in accordance with 30 TEX. ADMIN. CODE §§ 290.41 and 290.42; and
    - v. Submit payment for all outstanding fees, interest, and penalties for TCEQ Financial Administration Account No. 91011926. The payment shall be sent with the notation "Carol Norra Mobile Home Park, Financial Administration Account No. 91011926" to:



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

- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.g., and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.a.i. through 3.a.iv.
- c. Within 60 days after the effective date of this Order:
  - i. Develop and begin maintaining a chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements, in accordance with 30 TEX. ADMIN. CODE § 290.121; and
  - ii. Develop and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference, in accordance with 30 TEX. ADMIN. CODE § 290.42.
- d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 3.g., and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.c.i. and 3.c.ii.
- e. Within 90 days after the effective date of this Order:
  - i. Compile and maintain accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank, in accordance with 30 TEX. ADMIN. CODE § 290.46;
  - ii. Provide a quick-connect system which provides sufficient power to meet the capacity requirements in accordance with the affected utility's approved EPP, in accordance with 30 TEX. ADMIN. CODE § 290.45;
  - iii. Provide a well casing vent with an opening that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated, and located so as to minimize the drawing of contaminants into the well, in accordance with 30 TEX. ADMIN. CODE § 290.41; and
  - iv. Lock the well house and the housing for the pressure tanks to protect the Facility's well unit, potable water storage tanks, and pressure maintenance facilities, including but not limited to locking and bolting down the well house and locking the housing for the pressure tanks, in accordance with 30 TEX. ADMIN. CODE §§ 290.41 and 290.43.
- f. Within 105 days after the effective date of this Order, submit written certification, in accordance with Ordering Provision No. 3.g., to demonstrate compliance with Ordering Provision Nos. 3.e.i. through 3.e.iv.
- g. The certifications required by these Ordering Provisions shall be accompanied by detailed supporting documentation, including photographs, receipts, and/or other records, shall be signed by Respondent, and shall include the following certification language:

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

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

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

and:

Water Section Manager  
Houston Regional Office  
Texas Commission on Environmental Quality  
5425 Polk Street, Suite H  
Houston, Texas 77023-1452

and:

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

4. All relief not expressly granted in this Order is denied.
5. The provisions of this Order shall apply to and be binding upon Respondent. Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by Respondent shall be made in writing to the Executive Director. Extensions are not effective until Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
7. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to Respondent if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions in this Order.
8. The provisions of this Order are deemed severable, and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
9. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
10. The Chief Clerk shall provide a copy of this fully executed Order to each of the parties. By law, the effective date of this Order shall be the date the Order is final, as provided by 30 TEX. ADMIN. CODE § 70.106(d) and TEX. GOV'T CODE § 2001.144.

**S I G N A T U R E   P A G E**

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

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For the Commission

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Date

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



## UNSWORN DECLARATION OF CASEY KURNATH

"On behalf of the Executive Director of the Texas Commission on Environmental Quality, the 'Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of Carol Ann Norra dba Carol Norra Mobile Home Park' (the "EDPRP") was filed in the TCEQ Chief Clerk's office on January 19, 2024.

The EDPRP was mailed to Respondent's last known address on January 19, 2024, via certified mail, return receipt requested, postage prepaid. The United States Postal Service returned the EDPRP sent by certified mail as "unclaimed."

On behalf of the Executive Director of the Texas Commission on Environmental Quality, the EDPRP was re-filed in the TCEQ Chief Clerk's office on March 7, 2024.

The EDPRP was mailed to Respondent's last known address on March 7, 2024, via certified mail, return receipt requested, and via first class mail, postage prepaid. The United States Postal Service returned the EDPRP sent by certified mail as "unclaimed." The first-class mail has not been returned, indicating that Respondent received notice of the EDPRP in accordance with 30 TEX. ADMIN. CODE § 70.104(c)(2).

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

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

Executed in Travis County,  
State of Texas,  
on the 16<sup>th</sup> day of May, 2024

*Casey Kurnath*

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Declarant