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

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

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

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)(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;

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 62205 Carol Ann Norra dba Carol Norra Mobile Home Park RN101282572

Docket No. 2022-0425-PWS-E

- 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

TCEO Enforcement Coordinator: Samantha Salas, Enforcement Division, (512) 239-1543

TCEO 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





Penalty Calculation Worksheet (PCW)

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

DATES Assigned 11-Apr-2022
PCW 14-Apr-2022 Screening 13-Apr-2022 EPA Due

RESPONDENT/FACILITY INFORMATION

Respondent
Reg. Ent. Ref. No.
Facility/Site Region

Respondent
Reg. Ent. Ref. No.
Facility/Site Region

Respondent
Respon

CASE INFORMATION

Enf./Case ID No. 62205
Docket No. 2022-0425-PWS-E
Media Program(s) Multi-Media

Multi-Media

Admin. Penalty \$ Limit Minimum \$50 Maximum

			Donalty C	`alcula	tion Costic	<u></u>		
TOTA	L DACE DENA	LTV (Cum of	,		tion Section	ווע	Code to to 1.4	\$7,050
IUIA	L BASE PENA	LIY (Sum o	violation base	e penai	ties)		Subtotal 1	\$7,050
ADJU	STMENTS (+	/-) TO SUBT	OTAL 1					
	Subtotals 2-7 are of	tained by multiplyin	g the Total Base Penalty					
	Compliance Hi	story		0.0%	Adjustment	Subto	otals 2, 3, & 7	\$0
	Notes		No adjustment fo	r Complia	nce History.			
			-					
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notos	The Pa	spondent does not	moot the	culpability crito	ria		
	Notes	THE RE	spondent does not	. meet the	culpability crite	ııa.		
	Good Faith Eff	ort to Comply 1	otal Adjustments	S			Subtotal 5	\$0
	Economic Ben	efit Total EB Amounts	+000	0.0.0	Enhancement* d at the Total EB \$ A		Subtotal 6	\$0
	Estimated	Cost of Compliance	\$923 \$6,365	"Сарре	u at the Total EB \$ F	arriourit		
CLINA	OF CURTOTA							+= 0=0
SUM (OF SUBTOTA	LS 1-/					Final Subtotal	\$7,050
OTHE	R FACTORS A	AS JUSTICE N	MAY REQUIRE		0.0%		Adjustment	\$0
	or enhances the Fina							
	Notes							
	Notes							
						Final Pe	nalty Amount	\$7,050
STAT	UTORY LIMIT	ADJUSTME	NT			Final Assi	essed Penalty	\$7,050
		. ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	••			7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7		4-7
DEFE					0.0%	Reduction	Adjustment	\$0
Reduces	the Final Assessed Pe	nalty by the indicate	d percentage.				7	
	Notes	Defe	rral not offered for	non-expe	edited settlemen	t.		
		26.6						
		_						
PAYA	BLE PENALT	Y						\$7,050

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Screening Date 13-Apr-2022

Docket No. 2022-0425-PWS-E

Respondent Carol Ann Norra dba Carol Norra Mobile Home Park

Case ID No. 62205

Reg. Ent. Reference No. RN101282572

Media Public Water Supply

Enf. Coordinator Samantha Salas

	C	Compliance History Worksheet			
>>	Component	ory Site Enhancement (Subtotal 2) Number of	Number	Adjust.	
	NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%	
		Other written NOVs	0	0%	
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%	
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%	
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%	
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%	
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%	
		I			
		Environmental management systems in place for one year or more	No	0%	
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
		Participation in a voluntary pollution reduction program	No	0%	
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
		Adjustment Per	centage (Sub	total 2)	0%
>>	Repeat Violator	(Subtotal 3)			
	N/A	Adjustment Per	centage (Sub	total 3)	0%
>>	Compliance Hist	ory Person Classification (Subtotal 7)			
	N/A	Adjustment Per	centage (Sub	total 7)	0%
>>	Compliance Hist	ory Summary			
	Compliance History Notes	No adjustment for Compliance History.			
		Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7) [0%
>> I	Final Compliance	History Adjustment			- 1
		Final Adjustment Percenta	age *capped a	at 100%	0%

Screening Date		PCW
Respondent	Carol Ann Norra dba Carol Norra Mobile Home Park	Policy Revision 5 (January 28, 202)
Case ID No.	62205	PCW Revision February 11, 202
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)	
	3 11 1 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	
Violation Description	Failed to maintain at the public water system accurate and up-to-date built plans or record drawings and specifications for each treatment p station, and storage tank until the Facility is decommissioned	o <mark>lant, pump</mark>
		sse Penalty \$5,00
>> Environmental, Prope	rty and Human Health Matrix	
	Harm	
Release	Major Moderate Minor	
OR Actual Potential	Percent 0.0%	/
rotential	Percent 0.09	<u>'0</u>
>>Programmatic Matrix		
Falsification	Major Moderate Minor	
	X Percent 10.0%	/ o
Matrix Notes	100% of the rule requirements were not met.	
	Adjustment	\$4,500
	Adjustment	ψ4,300
		\$50
Violation Events		
Number of N	/iolation Events 1 70 Number of violatio	on days
Number of V	Notation Events 1 70 Number of violation	on days
	daily	
	weekly	
	monthly	<u> </u>
	quarterly Violation Ba	ase Penalty \$50
	semiannual	
	annual	
	single event x	
	One single event is recommended.	
-		
Good Faith Efforts to Com		Reduction \$
	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary	
	Ordinary	
	N/A x	- 1
	Notes The Respondent does not meet the good faith criteria	
	for this violation.	
		_
	Violatio	on Subtotal \$50
Economic Benefit (EB) for		
	this violation Statutory Lim	nit Test
		nit Test enalty Total \$50

	E	conomic	Benefit	ıoW	rksheet		
Respondent	Carol Ann Nor	ra dba Carol Norra	a Mobile Home P	ark			
Case ID No.	62205						
Reg. Ent. Reference No.	RN101282572						
	Public Water S						Years of
Violation No.						Percent Interest	Depreciation
Violation ito	-					5.0	15
	Thoma Cook	Data Damiliand	Final Data	V	Tutawast Caused	Costs Saved	
		Date Required	Final Date	TIS	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	I			-l			
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	+100	24 7 1 2020	16.14 2024	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 Permit Costs				0.00	\$0	n/a	\$0
				0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)				0.00	\$0	II/d	\$U
Notes for DELAYED costs	date detailed	l as-built plans or	record drawings from the date of	and sp	ecifications for each	water system accu th treatment plant, documenting the vi	pump station,
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$180			TOTAL		\$33

	E	conomic	Benefit	woi	rksneet		
		ra dba Carol Norra	a Mobile Home P	ark			
Case ID No.	62205						
Reg. Ent. Reference No.	RN101282572						
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	2					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description						55555 54154	
Item Description							
Delayed Costs							
Delayed Costs Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$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	records an	d make them imn	nediately availab ne investigation i	le for ir	nspection upon required the value of the val	tem operation and i juest by the Executiviolation to the estim	ve Director,
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Other (as needed)							
Notes for AVOIDED costs							

	Scre	ening Date	13-Apr-2022		Docket No.	2022-0425-PWS-E		PCW
	F	Respondent	Carol Ann Norra	dba Carol N	orra Mobile Home Park		Policy Re	evision 5 (January 28, 2021)
	(Case ID No.	62205				PCW	Revision February 11, 2021
Reg.	Ent. Ref	ference No.	RN101282572					
		Media	Public Water Su	pply				
	Enf. C	coordinator	Samantha Salas	5				
	Viol	ation Number	3					
		Rule Cite(s)		30 T	ex. Admin. Code § 290.4	16(n)(2)		
				50 1	ex. Admin. code 3 250.	10(11)(2)		
	Violatio	n Description			accurate and up-to-date nains can be easily locat			
		!				Base	Penalty	\$5,000
>> Env	vironme	ntal, Prope	rty and Hum	an Health	Matrix			
		, .	•	Harm				
		Release	Major	Moderate	Minor			
OR		Actual						
		Potential				Percent 0.0%		
5 5 D		tic Metuic						
>>Prog	gramma	rtic Matrix Falsification	Major	Moderate	Minor			
		Taisincation	X	Moderate	Millor	Percent 10.0%		
			^			10.070		
	Matrix		100	% of the rule	requirements were not	met.		
	Notes							
					Ac	ljustment	\$4,500	
							_	* 500
							L	\$500
Violatio	on Even	ts						
Tiolatio	J., 270							
		Number of \	/iolation Events	1	70	Number of violation o	days	
						_		
			daily					
			weekly					
			monthly			Walatian Basa	ъ	* 500
			quarterly			Violation Base	Penalty	\$500
			semiannual					
			annual single event					
			Siligie event	Х				
				One single	event is recommended.			
Good F	aith Eff	orts to Com		0.0%	NOT/NOV/ to EDDDD/Cattlena		Reduction	\$0
			Extraordinary	efore NOE/NOV	NOE/NOV to EDPRP/Settlem	T Oner		
			l i			_		
			Ordinary					
			N/A	Х				
			Notos	The Respond	lent does not meet the g	good faith criteria for		
			Notes		this violation.			
			L					
						Violation	Subtotal	\$500
Econon	nic Bene	efit (EB) for	this violation	on		Statutory Limit	Test	
			_		105		_	
		Estimate	ed EB Amount		\$26	Violation Final Pena	ity Total	\$500
				This vio	lation Final Assessed	Penalty (adjusted for	or limits)	\$500
				5 410		, (aajastea le		4500

	E	conomic	Benefit	Woi	ksheet		
Respondent	Carol Ann Nor	ra dba Carol Norra	a Mobile Home P	ark			
Case ID No.	62205						
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		арргу				Percent Interest	Depreciation
Violation No.	J					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				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	distribution sy date of	stem so that valve the investigation i	es and mains ca nitially documen	n be ea	esily located during e violation to the e	ccurate and up-to-da emergencies, calcu stimated date of con	ulated from the mpliance.
Avoided Costs	ANNU	ALIZE avoided o	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0	\$0
Other (as needed) Notes for AVOIDED costs		<u> </u>		0.00	1 \$0	\$0	\$0
Approx. Cost of Compliance		\$180			TOTAL		\$26

	Scree	ening Date	13-Apr-2022		Do	cket No.	2022-0425-PWS-E			PCW
	R	espondent	Carol Ann Norra	a dba Carol No	rra Mobile H	ome Park		Policy R	evision 5 (Ja	anuary 28, 2021)
	C	ase ID No.	62205					PCW	/ Revision Fe	ebruary 11, 2021
Reg.	Ent. Refe	erence No.	RN101282572							
_		Media	Public Water Su	ipply						
	Enf. Co	oordinator	Samantha Salas	S						
		tion Number								
		Rule Cite(s)		20.7		5 200 424				
		` '		30 Tex.	Admin. Code	§ 290.121(a) and (b)			
			E-H-day d		-1-6-1			-11		
							emical and microbiolo			
	Violation	Description					ons, describes the san ad laboratories that th			
			irequericy, and				requirements.	е гаспіту		
				Will doc to co	imply with the	e momeomi	, requirements.			
							_			
							Base	Penalty		\$5,000
> = Em	iranman	tal Drama	the and House	an Haalth	Matrix					
// EII	vironinei	itai, Propei	rty and Hum	Harm	Matrix					
		Release	Major	Moderate	Minor					
OR		Actual								
		Potential					Percent 0.0%			
>>Pro	grammat	tic Matrix								
		Falsification	Major	Moderate	Minor					
			Х				Percent 10.0%			
	_					l				
	Matrix		100)% of the rule	requirement	s were not	met.			
	Notes				•					
	F									
						Ad	justment	\$4,500		
										\$500
\/:-I-+:		_								
violati	on Event	S								
		Number of \	iolation Events	1	Ī	70	Number of violation	dave		
		Number of V	Holdtion Events	1	Ц	70	Number of Violation	auys		
			daily							
			weekly							
			monthly							
			quarterly				Violation Base	Penalty		\$500
			semiannual							,
			annual							
			single event	Х						
		<u> </u>								
				One single	event is reco	mmended.				
										, -
Good F	aith Effo	rts to Com		0.0%	NOT /NOV	DDDD/C-+-'		Reduction		\$0
				efore NOE/NOV	NOE/NOV to El	DPKP/Settleme	ni Offer			
			Extraordinary							
			Ordinary							
			N/A	X						
				The Respond	ent does not	meet the a	ood faith criteria for			
			Notes	. Ac Respond		violation.	ood faltif criteria for			
			·					Culture of		±=0.0
							Violation	Subtotal		\$500
Fconor	mic Rene	fit (FR) for	this violation	n n			Statutory Limit	Test		
LCOHOL	Delle	(20) 101	tilis violatio	J.1			Statutory Limit	LSC		
		Estimate	ed EB Amount		\$18	,	Violation Final Pena	ity Total		\$500
			•			_				. = .
				This viol	ation Final	Assessed I	Penalty (adjusted fo	or limits)		\$500

	E	conomic	Benefit	10W	rksneet		
Respondent	Carol Ann Nor	ra dba Carol Norra	a Mobile Home P	ark			
Case ID No.	62205						
Reg. Ent. Reference No.	RN101282572						
Media	Public Water S	Supply				Percent Interest	Years of
Violation No.	4					reiteilt Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$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
	The dela	ved cost includes	the estimated ar	nount t	o develop and beg	in maintaining a che	emical and
Notes for DELAYED costs						igation to the estim	
		,	•	complia		.gation to the dotini	atea aate o.
				p			
Avoided Costs	ANNU	Al TZF avoided c	osts hefore en				
		ALILL UVOIGCU C	OSES DETOTE CIT			one-time avoided	
Disposal		LIZE avoided	osts before en	0.00	\$0	\$0	\$0
Personnel			Deloie en	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Personnel Inspection/Reporting/Sampling				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment			SSES BEFORE CIT	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance			oses before en	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs			osts before en	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) Notes for AVOIDED costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)		\$180		0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0

	Screening Date	13-Apr-2022	Docket No.	2022-0425-PWS-E	PCW
	Respondent	Carol Ann Norra dba Carol N	orra Mobile Home Park	Poli	cy 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	5			
	Rule Cite(s)	30	Tex. Admin. Code § 290	42(1)	
		30	Text Admin. Code 3 250	2 (1)	
	Violation Description		ain a thorough and up-to operator review and refe	o-date plant operations manu rence.	al
				Base Pena	ty \$5,000
>> Env	vironmental, Prope	rty and Human Health	Matrix		
		Harm			
	Release	Major Moderate	Minor		
OR	Actual			_	
	Potential			Percent 0.0%	
>> Dro	grammatic Matrix				
>>P10	Falsification	Major Moderate	Minor		
	Talsineation	x	Timol	Percent 10.0%	
	Matrix	100% of the ru	le requirement was not n	net.	
	Notes		·		
	<u> </u>				
			Ad	justment \$4,5	00
					\$500
					\$500
Violatio	on Events				
				_	
	Number of \	/iolation Events 1	70	Number of violation days	
			- 1		
		daily			
		weekly			
		monthly quarterly		Violation Base Pena	ty \$500
		semiannual		Violation base Fella	Ly \$300
		annual			
		single event x			
	<u> </u>		1		
		One single	event is recommended.		
Good F	aith Efforts to Com	ply 0.0%		Reducti	on \$0
30001	and Enoits to com	Before NOE/NOV	NOE/NOV to EDPRP/Settleme	ent Offer	JII 40
		Extraordinary		1	
		Ordinary			
		N/A x		2	
		The Beenene		and faith suitania for	
		Notes The Respond	lent does not meet the g this violation.	ood raith criteria for	
			this violation.		
				Violation Subto	:al \$500
Econor	nic Benefit (EB) for	this violation		Statutory Limit Test	
				-	
	Estimate	ed EB Amount	\$18	Violation Final Penalty To	:al \$500
		This vio	lation Final Assessed	Penalty (adjusted for limit	s) \$500
				, (,	+500

	E	conomic	Benefit	Woı	rksheet		
Respondent	Carol Ann Nor	ra dba Carol Norr	a Mobile Home F	Park			
Case ID No.							
Reg. Ent. Reference No.		1					
	Public Water S						Years of
		supply				Percent Interest	Depreciation
Violation No.	5						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	operations	manual, calculate	ed from the date	of the	investigation to the	n a thorough and up e estimated date of	compliance.
Avoided Costs	ANNU	ALIZE avoided o	osts before er			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0 \$0
Other (as needed)		<u> </u>		0.00	3 0	\$ 0	3 0
Notes for AVOIDED costs							

		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. En	t. Reference No.	RN101282572		
	Media	Public Water Sup	ply	
	Enf. Coordinator	Samantha Salas		
	Violation Number	6		
	Rule Cite(s)		30 Tex. Admin. Code § 290.45(h)(1)	
			30 Tex. Admin. Code § 230.43(1)(1)	
		Failed to provide	e sufficient power to meet the capacity requirements in accord	lance
		-	ected utility's approved Emergency Preparedness Plan ("EPP")	
Vi	iolation Description		e Facility's approved EPP indicates the use of a portable gener	
		equipped with a	quick-connect system, however, the Facility did not have a q	uick-
			connect system installed.	
			Base Pe	enalty \$5,000
 	anniantal Duana		u Haalth Matrix	
>> ENVIR	onmental, Prope	rty and Huma	Harm	
	Release	Major	Moderate Minor	
OR	Actual		· ········	
	Potential		Percent 15.0%	
>>Progra	mmatic Matrix			
	Falsification	Major	Moderate Minor	
			Percent 0.0%	
	Astrice Epilema to pro	vida amarganav n	ower could cause water outages and expose persons served b	vy tho
		5 , 1	its which would exceed levels protective of human health.	y the
'	votes rue.	ney to contaminar	to which would exceed levels protective of number health	
	•			
			Adjustment \$	4,250
				\$750
				\$730
Violation	Fvents			
Violation	LVCIICS			
	Number of \	Violation Events	3 Number of violation days	5
		daily		
		weekly		
		monthly	X	
		11101161117		
		quarterly	Violation Base Pe	enalty \$2,250
		quarterly semiannual		enalty \$2,250
		quarterly semiannual annual		*************************************
		quarterly semiannual		*************************************
		quarterly semiannual annual		:nalty \$2,250
	Three monthly	quarterly semiannual annual single event		
	Three monthly	quarterly semiannual annual single event	Violation Base Pe	
	Three monthly	quarterly semiannual annual single event	Violation Base Pe	
Good Fait		quarterly semiannual annual single event y events are recor 2022	nmended, calculated from the date of the investigation, Febru, to the date of screening, April 13, 2022.	ary 2,
Good Fait	Three monthly	quarterly semiannual annual single event 2022	nmended, calculated from the date of the investigation, Febru, to the date of screening, April 13, 2022.	ary 2,
Good Fait		quarterly semiannual annual single event 2022	nmended, calculated from the date of the investigation, Febru, to the date of screening, April 13, 2022. 0.0%	ary 2,
Good Fait		quarterly semiannual annual single event 2022	nmended, calculated from the date of the investigation, Febru, to the date of screening, April 13, 2022. 0.0%	ary 2,
Good Fait		quarterly semiannual annual single event y events are recor 2022 iply Extraordinary Ordinary	nmended, calculated from the date of the investigation, Febru, to the date of screening, April 13, 2022. 0.0% ORENOE/NOV NOE/NOV to EDPRP/Settlement Offer	ary 2,
Good Fait		quarterly semiannual annual single event y events are recor 2022 ply Extraordinary Ordinary N/A	nmended, calculated from the date of the investigation, February to the date of screening, April 13, 2022. 0.0%	ary 2,
Good Fait		quarterly semiannual annual single event y events are recor 2022 iply Extraordinary Ordinary N/A	Namended, calculated from the date of the investigation, Februa, to the date of screening, April 13, 2022. O.0% OTE NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for	ary 2,
Good Fait		quarterly semiannual annual single event y events are recor 2022 ply Extraordinary Ordinary N/A	nmended, calculated from the date of the investigation, February to the date of screening, April 13, 2022. 0.0%	ary 2,
Good Fait		quarterly semiannual annual single event y events are recor 2022 iply Extraordinary Ordinary N/A	Namended, calculated from the date of the investigation, Februa, to the date of screening, April 13, 2022. O.0% OTE NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for	ary 2,
Good Fait		quarterly semiannual annual single event y events are recor 2022 iply Extraordinary Ordinary N/A	Namended, calculated from the date of the investigation, Februa, to the date of screening, April 13, 2022. O.0% OTE NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for	uction \$0
	h Efforts to Com	quarterly semiannual annual single event 2022 ply events are recored 2022 ply Bef Extraordinary Ordinary N/A Notes	Namended, calculated from the date of the investigation, February to the date of screening, April 13, 2022. Reduce NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Sultation	stotal \$2,250
		quarterly semiannual annual single event 2022 ply events are recored 2022 ply Bef Extraordinary Ordinary N/A Notes	Namended, calculated from the date of the investigation, February to the date of screening, April 13, 2022. Reduce NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Sultation	stotal \$2,250
	h Efforts to Com	quarterly semiannual annual single event 2022 ply events are record 2022 ply Bef Extraordinary Ordinary N/A Notes	nmended, calculated from the date of the investigation, February to the date of screening, April 13, 2022. Reduced the NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Sultant Temporary Company Com	st s s s s s s s s s
	h Efforts to Com	quarterly semiannual annual single event 2022 ply events are recored 2022 ply Bef Extraordinary Ordinary N/A Notes	Namended, calculated from the date of the investigation, February to the date of screening, April 13, 2022. Reduce NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Sultation	st

	E	conomic	Benefit	Woı	rksheet		
Respondent	Carol Ann Nor	ra dba Carol Norr	a Mobile Home F	ark			
Case ID No.	62205						
Reg. Ent. Reference No.	RN101282572	2					
Media Violation No.	Public Water 5	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				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 Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs	sufficient po	wer to meet the ca	apacity requirem	ents in	accordance with the	connect system which he affected utility's	approved EPP,
						d date of compliance	
Avoided Costs	ANNU	ALIZE avoided C	osts before en			one-time avoided	
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				,,			
Approx. Cost of Compliance		\$5,000			TOTAL		\$741

	E	conomic	Benefit	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	62205	ra dba Carol Norra	a Mobile Home F	ark			
Media Violation No.	Public Water S 7	Supply				Percent Interest	Years of Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment		1 1		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	national code	for the well house from the date	, pressure tank e of the investig	housing ation to	g, and sodium hypo the estimated dat	viring in compliance ochlorite injection pure of compliance.	ump, calculated
Avoided Costs	ANNU	ALIZE avoided C	osts before en		\$0		
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$0 \$0	\$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

Screening Date	13-Apr-2022	Docket No. 2022-0425-PWS-E	PCW
Respondent	Carol Ann Norra	dba Carol Norra Mobile Home Park	licy Revision 5 (January 28, 2021)
Case ID No.	62205		PCW Revision February 11, 2021
Reg. Ent. Reference No.	RN101282572		
	Public Water Sup	ply	
Enf. Coordinator		r <i>1</i>	
Violation Number			
Rule Cite(s)			
Rule Cite(3)		30 Tex. Admin. Code § 290.41(c)(3)(K)	
		the wellhead by a gasket or sealing compound and provide a we	
Violetian Description		the well that is covered with 16-mesh or finer corrosion-resistant	
Violation Description		downward, elevated, and located so as to minimize the drawing to the well. Specifically, the well casing vent was not covered w	
	Contaminants in	16-mesh or finer corrosion-resistant screen.	1011
		10 mesh of finer corrosion resistant screen.	
		Base Pena	\$5,000
>> Environmental Brone	rty and Huma	n Hoolth Matrix	
>> Environmental, Prope	ity and numa	Harm	
Release	. Major	Moderate Minor	
OR Actua			
Potentia		X Percent 5.0%	
>>Programmatic Matrix			
Falsification	Major	Moderate Minor	
		Percent 0.0%	
Failure to	provide a 16-mesh	or finer corrosion-resistant screen for the well casing vent could	d
Matrix expose per		e Facility to a significant amount of contaminants which would no	
Notes	exc	eed levels protective of human health.	
		<u> </u>	
		Adjustment \$4,	750
		<u> </u>	
			\$250
			\$230
			\$250
Violation Events			φ230
	Miglation Events	1 Number of violeties days	\$230
	Violation Events	1 70 Number of violation days	\$230
	•	1 70 Number of violation days	\$230
	daily	1 70 Number of violation days	\$230
	daily weekly	1 70 Number of violation days	\$230
	daily weekly monthly		
	daily weekly monthly quarterly	1 70 Number of violation days X Violation Base Pena	
	daily weekly monthly quarterly semiannual		
	daily weekly monthly quarterly semiannual annual		
	daily weekly monthly quarterly semiannual		
Number of	daily weekly monthly quarterly semiannual annual single event	X Violation Base Pena	
Number of	daily weekly monthly quarterly semiannual annual single event	X Violation Base Penalectory Violation Violation Base Penalectory Violation Base Penalectory Violation Viol	
Number of	daily weekly monthly quarterly semiannual annual single event	X Violation Base Pena	
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2,	ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022.	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2,	violation Base Penalecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. 0.0% Reduct	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2,	x Violation Base Penal ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022.	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2,	violation Base Penalecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. 0.0% Reduct	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2,	violation Base Penalecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. 0.0% Reduct	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, pupply Extraordinary	violation Base Penalecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. 0.0% Reduct	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, pupply Extraordinary Ordinary N/A	x Violation Base Pena ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. 0.0% Reduct ore NOE/NOV NOE/NOV to EDPRP/Settlement Offer x	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, pupply Extraordinary Ordinary N/A	violation Base Penal ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. O.0% DIE NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, purply Extraordinary Ordinary N/A	x Violation Base Pena ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. 0.0% Reduct ore NOE/NOV NOE/NOV to EDPRP/Settlement Offer x	*250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, purply Extraordinary Ordinary N/A	ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. O.0% ORE NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation.	alty \$250
Number of	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, purply Extraordinary Ordinary N/A	violation Base Penal ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. O.0% DIE NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for	alty \$250
One of On	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, pupply Extraordinary Ordinary N/A Notes	Wiolation Base Penal ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. Reduction NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Subte	*250 stal \$250
One of On	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, nply Extraordinary Ordinary N/A Notes	Wiolation Base Penal ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. Reduction NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Subte	*250 stal \$250
One of On	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, pupply Extraordinary Ordinary N/A Notes	Wiolation Base Penal ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. Reduction NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for this violation. Violation Subte	alty \$250 tion \$0 btal \$250
One of On	daily weekly monthly quarterly semiannual annual single event quarterly event is r February 2, nply Extraordinary Ordinary N/A Notes	violation Base Pena ecommended, calculated from the date of the investigation, 2022, to the date of screening, April 13, 2022. Reduct ore NOE/NOV NOE/NOV to EDPRP/Settlement Offer x The Respondent does not meet the good faith criteria for this violation. Violation Subtantal Statutory Limit Test	\$250 \$250

	E	conomic	Benefit	Woı	'ksheet		
Respondent	Carol Ann Nor	ra dba Carol Norra	a Mobile Home P	ark			
Case ID No.	62205						
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		ларрту				Percent Interest	Depreciation
Violation No.	U					5.0	15
	-						
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
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	for the well c	asing vent, calcula	ated from the da	te of th	e investigation to	or finer corrosion-re the estimated date	of compliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoided	
Disposal -				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	3 0	\$ 0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$150			TOTAL		\$22

	Scree	_				2022-0425-PWS-E		PCW
	R	espondent	Carol Ann Nori	ra dba Carol N	orra Mobile Home Park		Policy Re	evision 5 (January 28, 2021)
	C	ase ID No.	62205				PCW	Revision February 11, 2021
Reg.	Ent. Refe	erence No.	RN101282572					
			Public Water S					
	Enf. C		Samantha Sala					
		tion Number		í				
	Viola	Rule Cite(s)		<u> </u>				
		Rule Cite(S)		30 Tex. Admin	. Code §§ 290.41(c)(3)	(O) and 290.43(e)		
	Violation	n Description	potable water during perio well house wa	r storage tank, ds of darkness is not locked o tanks was unlo	and pressure maintent and when the Facility i r bolted down. Addition	ell house around each wance facility that remain is unattended. Specificanally, the door to the honandwritten sign on the se or lock".	s locked Illy, the using for	
						Base	Penalty	\$5,000
>> Em.	vironmo	stal Drope	rty and U	nan Haalth	Matriy			
EIIV	vii oiiiilel	itai, Frope	rty and Hun	nan ne aitn Harm	Matrix			
		Release	Major	Moderate	Minor			
OR		Actual						
		Potential		Х		Percent 5.0%		
		. Scericiai		^		5.070		
>>Pro	aramma	tic Matrix						
	grannia	Falsification	Major	Moderate	Minor			
	Ī	Taisineacion	Major	Moderate	THITOI	Percent 0.0%		
	Ī					0.0 %		
	Ī							
		Failure to pro	vide an intrude	er-resistant fen	ice or lockable well bou	se could result in contar	mination	
	Matrix	•				acility to a significant am		
	Notes				exceed levels protective		iouric or	
			contaminants t	nat would not	exceed levels protective	e or numan nearm.		
	Ц							
					A	djustment	\$4,750	
							_	
								\$250
								\$250
Violation	on Event	s						\$250
Violatio	on Event							\$250
Violatio	on Event		/iolation Events	1	70	Number of violation d	lays	\$250
Violatio	on Event		/iolation Events	1	70	Number of violation d	lays	\$250
Violatio	on Event		/iolation Events	1	70	Number of violation d	lays	\$250
Violatio	on Event			1	70	Number of violation d	lays	\$250
Violatio	on Event		daily	1	70			\$250
Violatio	on Event		daily weekly	1 x	70			\$250 \$250
Violatio	on Event		daily weekly monthly		70	Number of violation d Violation Base		·
Violatio	on Event		daily weekly monthly quarterly		70			·
Violatio	on Event		daily weekly monthly quarterly semiannual annual		70			·
Violatio	on Event		daily weekly monthly quarterly semiannual		70			·
Violatio	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	X		Violation Base	Penalty	·
Violatio	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	x x s recommende	ed, calculated from the	Violation Base date of the investigation	Penalty	·
Violatio	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	x x s recommende		Violation Base date of the investigation	Penalty	·
Violatio	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	x x s recommende	ed, calculated from the	Violation Base date of the investigation	Penalty	·
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February	x x s recommende	ed, calculated from the	Violation Base date of the investigation oril 13, 2022.	Penalty	·
		Number of \	daily weekly monthly quarterly semiannual annual single event uarterly event i February	x s recommende 2, 2022, to the	ed, calculated from the	Violation Base date of the investigation oril 13, 2022.	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February	x x s recommende 2, 2022, to the 0.0% Before NOE/NOV	ed, calculated from the le date of screening, Ap	Violation Base date of the investigation oril 13, 2022.	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February	x s recommende 2, 2022, to th 0.0% Before NOE/NOV	ed, calculated from the le date of screening, Ap	Violation Base date of the investigation oril 13, 2022.	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February Extraordinary Ordinary	x s recommende 2, 2022, to th 0.0% Before NOE/NOV	ed, calculated from the le date of screening, Ap	Violation Base date of the investigation oril 13, 2022.	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February	x s recommende 2, 2022, to th 0.0% Before NOE/NOV	ed, calculated from the le date of screening, Ap	Violation Base date of the investigation oril 13, 2022.	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February Extraordinary Ordinary	x s recommende 2, 2022, to th 0.0% Before NOE/NOV x The Responde	ed, calculated from the le date of screening, Ap	Violation Base date of the investigation oril 13, 2022. Rement Offer	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February Extraordinary Ordinary	x s recommende 2, 2022, to th 0.0% Before NOE/NOV x The Responde	ed, calculated from the e date of screening, Ap NOE/NOV to EDPRP/Settler	Violation Base date of the investigation oril 13, 2022. Rement Offer	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February Extraordinary Ordinary	x s recommende 2, 2022, to th 0.0% Before NOE/NOV x The Responde	NOE/NOV to EDPRP/Settler	Violation Base date of the investigation oril 13, 2022. Rement Offer	Penalty	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February Extraordinary Ordinary	x s recommende 2, 2022, to th 0.0% Before NOE/NOV x The Responde	NOE/NOV to EDPRP/Settler	date of the investigation oril 13, 2022. Rement Offer good faith criteria for	Penalty 1, deduction	\$250
		Number of \ One q	daily weekly monthly quarterly semiannual annual single event uarterly event i February Extraordinary Ordinary	x s recommende 2, 2022, to th 0.0% Before NOE/NOV x The Responde	NOE/NOV to EDPRP/Settler	Violation Base date of the investigation oril 13, 2022. Rement Offer	Penalty 1, deduction	\$250
Good F	aith Effo	One questions to Com	daily weekly monthly quarterly semiannual annual single event uarterly event i February Extraordinary Ordinary	x x x x x x x x x x x x x x x x x x x	NOE/NOV to EDPRP/Settler	date of the investigation oril 13, 2022. Rement Offer good faith criteria for	Penalty Reduction Subtotal	\$250
Good F	aith Effo	One questions of Number of	daily weekly monthly quarterly semiannual annual single event uarterly event i February Ordinary N/A	x s recommende 2, 2022, to th 0.0% Before NOE/NOV X The Respond	NOE/NOV to EDPRP/Settler	date of the investigation oril 13, 2022. Rement Offer good faith criteria for Violation	Penalty deduction Subtotal	\$250
Good F	aith Effo	One questions of Number of	daily weekly monthly quarterly semiannual annual single event uarterly event i February Ordinary N/A Notes	x s recommende 2, 2022, to th 0.0% Before NOE/NOV x The Respond	NOE/NOV to EDPRP/Settler ent does not meet the this violation.	Violation Base date of the investigation oril 13, 2022. Rement Offer good faith criteria for Violation s	Penalty December 19	\$250 \$0 \$250

	E	conomic	Benefit '	Wor	ksheet		
Respondent Carol Ann Norra dba Carol Norra Mobile Home Park							
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.	Public Water S	ирріу				Percent Interest	Years of Depreciation
Violation No.	9					5.0	15
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Item Description	Item Cost	Date Required	rillai Date	113	Interest Saveu	Costs Saveu	LB Amount
Item Description							
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 \$0	n/a	\$0
Record Keeping System Training/Sampling	\$100	2-Feb-2022	16-Jan-2024	1.95	\$0 \$10	n/a n/a	\$0 \$10
Remediation/Disposal	2100	Z-Feb-2022	10-Jaii-2024	0.00	\$10	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	and lock the l	nousing for the pr g/sampling delaye I housing that pro	essure tanks, ca date ed cost includes to otects each well u nattended, calcul	lculated of con the esti unit, po	I from the date of npliance. mated amount to table water storagom the investigation	reinforce existing pre tank, and pressur on date to the estim	rocedures to e maintenance
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 #0	\$0 #0	\$0 #0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs		1		3.30	.	Ţ	
Approx. Cost of Compliance		\$250			TOTAL		\$32

	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		
_		Public Water Supply		
	Enf. Coordinator	Samantha Salas		
	Violation Number	10		
	Rule Cite(s)	30 Toy, Admin Co	edo S 200 E1(a)(6) and Tay, Water Code S E 702	
		30 Tex. Admin. Co	ode § 290.51(a)(6) and Tex. Water Code § 5.702	
		Failed to pay appual Publi	c Health Service fees and/or any associated late	fees for
	Violation Description		ration Account No. 91011926 for Fiscal Years 202	
			2023.	
			Rase	Penalty \$5,000
			Busc	\$3,000
>> En	vironmental, Prope	rty and Human Healt	h Matrix	
		Harm		
	Release	Major Moderate	Minor	
OR	Actual			
	Potential		Percent 0.0%	
> > D#0	arammatic Matrix			
>>PF0	grammatic Matrix Falsification	Major Moderate	Minor	
	1 disincación	Major	Percent 0.0%	
			i creene 0.070	
	Matrix			
	Notes			
			Adjustment	\$5,000
			Justine	7-7
				\$0
Violati	on Events			
	Number of V	Violation Events	Number of violation da	avs
	Number of	Violation Events	Number of violation de	dys
		daily		
		weekly	i	
		monthly	=	
		quarterly	Violation Base	Penalty \$0
		semiannual		
		annual		
		single event		
	All penalties a	and fees will be determined l	by the Financial Administration Division at the nex	xt billing
	Tan portarios o	2 2 2 3 3 3 7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	cycle.□	
			•	
Good I	aith Efforts to Com	ply 0.0%	6 P.	eduction \$0
Good i	aith Liferts to com	Before NOE/NO		eduction
		Extraordinary	,	
		Ordinary		
		N/A x		
		N/A X		
		Notes The Respor	ndent does not meet the good faith criteria for	
		Notes	this violation.	
			Violation S	Subtotal \$0
_				
Econo	mic Benefit (EB) for	this violation	Statutory Limit	Test
	Estimat	ed EB Amount	\$0 Violation Final Penal	ty Total \$0
	Estimat	ed EB Amount	\$0 Violation Final Penal	

	Е	conomic	Benefit	Wor	ksheet		
Respondent Case ID No. Reg. Ent. Reference No.	62205	ra dba Carol Norra	n Mobile Home F	ark			
_	Public Water 9					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/Construction				0.00	\$0 \$0		\$0 \$0
Land Record Keeping System				0.00	\$0 \$0	n/a 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	ANNU	ALIZE avoided c	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs		<u> </u>		N/ <i>A</i>	 	30	3 0
Approx. Cost of Compliance		\$0			TOTAL		\$0

The TCEQ is committed to accessibility.

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



Compliance History Report

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

Customer, Respondent, or CN600708515, NORRA, CAROL ANN Classification: NOT APPLICABLE Rating: N/A

Owner/Operator:

Regulated Entity: RN101282572, CAROL NORRA MOBILE Classification: NOT APPLICABLE Rating: N/A

HOME PARK

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

н.	Voluntary on-site compliance assessment dates: $\ensuremath{N/A}$
I.	Participation in a voluntary pollution reduction program: $\ensuremath{N/A}$
J.	Early compliance: N/A
	res Outside of Texas: N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
CAROL ANN NORRA DBA CAROL	§	TEAAS COMMISSION ON
NORRA MOBILE HOME PARK;	§	
RN101282572	§	ENVIRONMENTAL QUALITY

DEFAULT ORDER DOCKET NO. 2022-0425-PWS-E

On	, the Texas Commission on Environmental Quality ("Commission" or
"TCEQ") cons	idered the Executive Director's Preliminary Report and Petition, filed pursuant to Tex
HEALTH & SAFE	TY CODE ch. 341, Tex. Water Code ch. 5, and the rules of the TCEQ, which requests
appropriate r	elief, including the imposition of an administrative penalty and corrective action of
the responde	nt(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 Feburary 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 upto-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).
- 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.

Carol Ann Norra dba Carol Norra Mobile Home Park Docket No. 2022-0425-PWS-E Page 7

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY							
For the Commission	 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 TCEO 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^{th} day of May, 2024

Casey Kurnath

Declarant