Executive Summary – Enforcement Matter – Case No. 62407 Staff Water Supply Corporation RN101198711 Docket No. 2022-0636-PWS-E

Order Type:

Findings Agreed Order

Findings Order Justification:

Three repeated enforcement actions (or two orders with nuisance violations) over the prior five year period for the same violation(s).

Media:

PWS

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Staff WSC Flatwood Area, located at the intersection of Highway 6 and County Road 278, Eastland, Eastland County

Type of Operation:

Public water supply

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: March 8, 2024

Comments Received: No

Penalty Information

Total Penalty Assessed: \$4,950

Amount Deferred for Disinfection Byproducts for Eligible Systems: \$4,500

Total Paid to General Revenue: \$450 **Total Due to General Revenue:** \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - N/A Site/RN - N/A **Major Source:** No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

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

Date(s) of Investigation: May 2, 2022 through May 13, 2022

Date(s) of NOE(s): May 13, 2022

Executive Summary – Enforcement Matter – Case No. 62407 Staff Water Supply Corporation RN101198711 Docket No. 2022-0636-PWS-E

Violation Information

- 1. Failed to comply with the maximum contaminant level ("MCL") of 0.080 milligrams per liter ("mg/L") for total trihalomethanes, based on the locational running annual average [30 Tex. Admin. Code § 290.115(f)(1) and Tex. Health & Safety Code § 341.0315(c)].
- 2. Failed to comply with the MCL of 0.060 mg/L for haloacetic acids, based on the locational running annual average [30 Tex. Admin. Code § 290.115(f)(1) and Tex. Health & Safety Code § 341.0315(c)].
- 3. Failed to maintain a minimum disinfectant residual of 0.2 mg/L free chlorine throughout the distribution system in more than 5.0% of the samples collected each month, for any two consecutive months [30 Tex. Admin. Code § 290.110(b)(4) and (f)(6) and Tex. Health & Safety Code § 341.0315(c)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective measures:

a. By June 24, 2022, maintained a minimum disinfectant residual of 0.2 mg/L free chlorine throughout the distribution system in more than 5.0% of the samples collected each month, for two consecutive months at the Facility; and

b. By August 25, 2022, complied with the MCL for total trihalomethanes and haloacetic acids.

Technical Requirements:

N/A

Contact Information

TCEO Attornev: N/A

TCEQ Enforcement Coordinator: Ashley Lemke, Enforcement Division, Enforcement Team 4, MC R-12, (512) 239-1118; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Larry Herrington, President, Staff Water Supply Corporation, P.O. Box

421, Ranger, Texas 76470-0421 **Respondent's Attorney:** N/A



Penalty Calculation Worksheet (PCW) Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

CR IA-							
DATES Assigned	23-May-2022		<u></u>				
PCW	1-Jun-2022	Screening 27-May-202	22 EPA Due 30-Jun-2022				
RESPONDENT/FACILI							
Respondent	Staff Water Supp	ply Corporation (PCW No.	1)				
Reg. Ent. Ref. No.							
Facility/Site Region	3-Abilene		Major/Minor Source	Minor			
CASE INFORMATION							
Enf./Case ID No.			No. of Violations	2			
Docket No.	2022-0636-PWS	5-E	Order Type	Findings			
Media Program(s)	Public Water Sup	pply	Government/Non-Profit	Yes			
Multi-Media			Enf. Coordinator	Ashley Lemke			
			EC's Team	Enforcement Team	า 4		
Admin. Penalty \$ I	_imit Minimum	\$50 Maximum	\$5,000				
		Penalty Calcu	lation Section				
TOTAL BASE PENA	LTY (Sum of	violation base pen	alties)	Subtotal 1	\$5,000		
ADJUSTMENTS (+)	/-) TO SURT	ΌΤΔΙ 1					
			al 1) by the indicated percentage.				

			Penalty C	alcula	tion Section	on		
TOTA	L BASE PENA	LTY (Sum o	f violation base				Subtotal 1	\$5,000
ADJU	STMENTS (+	/-) TO SUBT	OTAL 1					
	Subtotals 2-7 are of Compliance Hi		ng the Total Base Penalty	(Subtotal 1) 0.0%) by the indicated pe Adjustment	ercentage. Subt e	otals 2, 3, & 7	\$0
	Notes		No adjustment for		<u>, </u>			72
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The R	espondent does not	meet the	culpability crite	ria.		
	Good Faith Eff	ort to Comply	Total Adjustments				Subtotal 5	-\$500
	Economic Ben				Enhancement*		Subtotal 6	\$0
	Estimated	Total EB Amounts I Cost of Compliance	4313	*Capped	d at the Total EB \$ A	lmount		
SUM (OF SUBTOTA	LS 1-7					Final Subtotal	\$4,500
	R FACTORS A		MAY REQUIRE licated percentage.		0.0%		Adjustment	\$0
	Notes							
						Final Pe	nalty Amount	\$4,500
STAT	UTORY LIMIT	Γ ADJUSTME	NT			Final Ass	essed Penalty	\$4,500
DEFE	RRAL				100.0%	Reduction	Adjustment	-\$4,500
	the Final Assessed Pe	The Execution disinfection	ed percentage. utive Director recom on byproduct violatio					
PAYA	BLE PENALT	Υ						\$0

Screening Date 27-May-2022

Respondent Staff Water Supply Corporation (PCW No. 1)

Case ID No. 62407

Reg. Ent. Reference No. RN101198711

Media Public Water Supply

Enf. Coordinator Ashley Lemke

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

PCW

Compliance History Worksheet

Component Number of NOVS Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria) Other written NOVs Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria) 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 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) 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 Convictions Any criminal convictions of this state or the federal government (number of counts) Owders Oncomponent Oncompone	
Other written NOVs Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria) 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 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) 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 (number of one of the federal government) Convictions Any criminal convictions of this state or the federal government (number of one of one of one of the federal government)	
Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria) 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 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) 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 Convictions Any criminal convictions of this state or the federal government (number of one of one of the federal government (number of one of one of the federal government (number of one of	
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Judgments and Consent Decrees Of liability of this state or the federal government (number of judgments or consent decrees meeting criteria) 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 Convictions Any criminal convictions of this state or the federal government (number of or consent decrees meeting criteria) 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 (number of or consent decrees meeting criteria)	
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 0 0% or the federal government Convictions Any criminal convictions of this state or the federal government (number of 0 0%)	
Emissions Chronic excessive emissions events (number of events) 0 0%	1
Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 0 0% 1995 (number of audits for which notices were submitted)	
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%	
	ĺ
Environmental management systems in place for one year or more No 0%	ĺ
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%	1
Early compliance with, or offer of a product that meets future state or federal government environmental requirements No 0%	
Adjustment Percentage (Subtotal 2)	09
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) [Final Compliance History Adjustment	0%
Final Adjustment Percentage *capped at 100%	0%

		ening Date	•			No. 2022-0636-PWS-E		PCW
	R	espondent	Staff Water Su	pply Corporat	ion (PCW No. 1)		Policy R	evision 5 (January 28, 2021)
	C	ase ID No.	62407				PCW	/ Revision February 11, 2021
Reg.	Ent. Ref		RN101198711					
			Public Water Su	upply				
			Ashley Lemke	1				
	Viola	ition Number	1					
		Rule Cite(s)	30 Te	ex. Admin. Co	de § 290.115(f)(1	l) and Tex. Health & Safety	,	
		. ,			Code § 341.03	-		
			Failed to compl	ly with the m:	avimum contamin	ant level ("MCL") of 0.080	milliarams	
			· ·	•		("TTHM"), based on the lo	_	
						locational running annual a		
	Violetio	n Dosavintian	concentration	_	•	ction Byproducts ("DBP2") a	_	
	Violatio	n Description	were 0.084 mg		•	1, 0.098 mg/L for the fourt	-	
						er of 2022 and at Site 2 wei		
			mg/L for the			ng/L for the fourth quarter of	of 2021,	
				and 0.112	2 mg/L for the firs	st quarter of 2022.		
						Race	e Penalty	\$5,000
						Dasi	e remaity [\$ 3,000
>> Env	vironme	ntal, Prope	rty and Hum	nan Health	Matrix			
			_	Harm				
0.5		Release		Moderate	Minor			
OR		Actual		Х		Downsont 25 00/		
		Potential				Percent 25.0%		
>> Dro	aramma	tic Matrix						
//PIU	yı amını	Falsification	Major	Moderate	Minor			
						Percent 0.0%		
		Europe din a the	MCL for TTUM			To ellinos has been assessed has a se	. : : <i>C</i> : L	
		_		•	•	Facility to be exposed to a s	_	
	Notes	amou	nt or contamina	nts which ald	not exceed levels	protective of human healt	1.	
						Adjustment	\$3,750	
							_	
								ተ1 ጋ ፔበ
							l	\$1,250
Violati	on Even	ts					Į.	\$1,250
Violati	on Even						l	\$1,250
Violati	on Even		/iolation Events	2	2	Number of violation	days	\$1,250
Violati	on Even			2	2	Number of violation	days	\$1,250
Violation	on Even		daily	2	2	Number of violation	days	\$1,250
Violation	on Even		daily weekly	2	2	Number of violation	days	\$1,250
Violation	on Even		daily weekly monthly	2	2		·	
Violation	on Even		daily weekly monthly quarterly	2	2	Number of violation Violation Base	·	\$1,250 \$2,500
Violation	on Even		daily weekly monthly	2 x	2		·	
Violation	on Even		daily weekly monthly quarterly semiannual		2		·	
Violati	on Even		daily weekly monthly quarterly semiannual annual		2		·	
Violati	on Even		daily weekly monthly quarterly semiannual annual single event	X		Violation Base	·	
Violation	on Even		daily weekly monthly quarterly semiannual annual single event	X			·	
Violati	on Even		daily weekly monthly quarterly semiannual annual single event	X		Violation Base	·	
		Number of \	daily weekly monthly quarterly semiannual annual single event	x al events are	recommended (o	Violation Base ne for each Site).	e Penalty	\$2,500
			daily weekly monthly quarterly semiannual annual single event Two annu	x al events are	recommended (o	Violation Base ne for each Site).	·	
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu	x al events are 10.0% Before NOE/NOV	recommended (o	Violation Base ne for each Site).	e Penalty	\$2,500
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu	x al events are 10.0% Before NOE/NOV	recommended (o	Violation Base ne for each Site).	e Penalty	\$2,500
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu	x al events are 10.0% Before NOE/NOV	recommended (o	Violation Base ne for each Site).	e Penalty	\$2,500
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu Ply Extraordinary Ordinary	x al events are 10.0% Before NOE/NOV	recommended (o	Violation Base ne for each Site).	e Penalty	\$2,500
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu Ply Extraordinary Ordinary	x al events are 10.0% Before NOE/NOV	recommended (o NOE/NOV to EDPRP/ X ndent achieved co	Violation Base ne for each Site). Settlement Offer ompliance on August 25,	e Penalty	\$2,500
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu Extraordinary Ordinary N/A	x al events are 10.0% Before NOE/NOV	recommended (o	Violation Base ne for each Site). Settlement Offer ompliance on August 25,	e Penalty	\$2,500
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu Extraordinary Ordinary N/A	x al events are 10.0% Before NOE/NOV	recommended (o NOE/NOV to EDPRP/ X ndent achieved co	violation Base ne for each Site). Settlement Offer compliance on August 25,	e Penalty	\$2,500
		Number of \	daily weekly monthly quarterly semiannual annual single event Two annu Extraordinary Ordinary N/A	x al events are 10.0% Before NOE/NOV	recommended (o NOE/NOV to EDPRP/ X ndent achieved co	violation Base ne for each Site). Settlement Offer compliance on August 25,	e Penalty	\$2,500
Good F	Faith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event Two annu Extraordinary Ordinary N/A	x al events are 10.0% Before NOE/NOV The Respon	recommended (o NOE/NOV to EDPRP/ X ndent achieved co	violation Base ne for each Site). Settlement Offer compliance on August 25,	e Penalty Reduction	\$2,500
Good F	Faith Eff	Number of Norts to Com	daily weekly monthly quarterly semiannual annual single event Two annu Ply Extraordinary Ordinary N/A Notes	x al events are 10.0% Before NOE/NOV The Respon	recommended (o NOE/NOV to EDPRP/ X ndent achieved co 2022	violation Base ne for each Site). Settlement Offer mpliance on August 25, Violation Statutory Limit	e Penalty Reduction Subtotal	\$2,500 \$250 \$2,250
Good F	Faith Eff	Number of Norts to Com	daily weekly monthly quarterly semiannual annual single event Two annu Extraordinary Ordinary N/A Notes	x al events are 10.0% Before NOE/NOV The Respon	recommended (o NOE/NOV to EDPRP/ X ndent achieved co	violation Base ne for each Site). Settlement Offer ompliance on August 25, . Violation	e Penalty Reduction Subtotal	\$2,500 \$250 \$2,250
Good F	Faith Eff	Number of Norts to Com	daily weekly monthly quarterly semiannual annual single event Two annu Ply Extraordinary Ordinary N/A Notes	al events are 10.0% Before NOE/NOV The Respon	recommended (o NOE/NOV to EDPRP/ x ndent achieved co 2022	violation Base ne for each Site). Settlement Offer mpliance on August 25, Violation Statutory Limit	e Penalty Reduction Subtotal Test alty Total	\$2,500 \$2,250 \$2,250

	E	conomic	Benefit	Woi	rksheet		
Respondent	Staff Water St	upply Corporation	(PCW No. 1)				
Case ID No.	62407						
Reg. Ent. Reference No.	RN101198711						
	Public Water 9						Years of
Violation No.	1	,				Percent 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)	\$5,000	30-Sep-2021	25-Aug-2022	0.90	\$15	\$300	\$315
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0 \$0	n/a n/a	<u>\$0</u> \$0
Record Keeping System 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	corrective ac	tions to return to quar	compliance with ter of noncomp	the MC liance t	CL for TTHM, calculo the date of comp		lay of the first
Avoided Costs	ANNU	ALIZE avoided co	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$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		\$315

		ening Date	•	Docket No. 2022-0636-PWS-E	PCW
	R	Respondent	Staff Water Supply Corporat	ion (PCW No. 1)	Policy Revision 5 (January 28, 2021)
	C	Case ID No.	62407		PCW Revision February 11, 2021
Reg.	Ent. Ref	erence No.	RN101198711		
		Media	Public Water Supply		
	Enf. C	Coordinator	Ashley Lemke		
	Viola	ation Number			
		Rule Cite(s)	30 Tex. Admin. Code § 290.	115(f)(1) and Tex. Health & Safety Code § 341.	<mark>0315(c)</mark>
			Failed to comply with the M	ICL of 0.060 mg/L for haloacetic acids ("HAA5"), annual average. Specifically, the locational rur	, based
	Violatio	n Description	annual average concentration third quarter of 2021, 0.07	ons of HAA5 for DBP2 at Site 1 were 0.065 mg/l 0 mg/L for the fourth quarter of 2021, and 0.07 2 and at Site 2 were 0.062 mg/L for the first qua 2022.	<mark>for the 6 mg/L </mark>
				Base	Penalty \$5,000
>> En	vironme	ntal, Prope	rty and Human Health Harm	n Matrix	
		Release		Minor	
OR		Actual			
		Potential		Percent 25.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix	_	•	ons served by the Facility to be exposed to a sig	nificant
	Notes	amoı	unt of contaminants which did	I not exceed levels protective of human health.	
				Adjustment	\$3,750
					\$1,250
					¥1,230
Violati	on Even	ts			
		Number of \	/iolation Events 2	273 Number of violation da	ays
			daily	1	
			weekly		
			monthly		
			quarterly	Violation Base	Penalty \$2,500
			semiannual		
			annual <u>x</u>		
			single event		
			Two annual events are	recommended (one for each Site).	
Good F	Faith Eff	orts to Com	10.0%		eduction \$250
Good I	aith Lin	orts to com		NOE/NOV to EDPRP/Settlement Offer	eduction \$250
			Extraordinary		
			Ordinary	X	
			N/A	<u> </u>	
			Notes The Respo	ondent achieved compliance on August 25, 2022.	
				2022.	
				Violation S	subtotal \$2,250
Econor	mic Bene	efit (EB) for	this violation	Statutory Limit	Гest
		Estimate	ed EB Amount	\$0 Violation Final Penal	ty Total \$2,250
				<u> </u>	
I			This vio	lation Final Assessed Penalty (adjusted for	limits) \$2,250

	E	conomic	Benefit	Wor	rksheet		
Respondent	Staff Water St	upply Corporation	(PCW No. 1)				
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		эарргу				Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		-					
2002 000							
Delayed Costs							
Équipment				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		<u> </u>		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		_	o compliance w	ith the N		fy, and implement t ssessed in the Econ	, , , , , , , , , , , , , , , , , , ,
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering	` -	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance		<u> </u>		0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Notes for AVOIDED costs		JI J		0.00	1 \$0	<u>1 \$0 </u>	\$0
Approx. Cost of Compliance		\$0			TOTAL		\$0



	12	Pe	naity C	alculatio	n Worksi	neet (PC	LVV)		
THE PONMENTAL OU	Policy Rev	ision 5 (January 28, 2	2021)				PCW Revis	ion February 11, 20.	21
DATES		23-May-2022			_				
	PCW	1-Jun-2022	Screening	27-May-2022	EPA Due	30-Jun-2022			
									_
RESPO	•	TY INFORMATI							
_		Staff Water Supp	oly Corporation	<u>on (PCW No. 2)</u>					
	g. Ent. Ref. No.								
Facilit	ty/Site Region	3-Abilene			Major/N	Minor Source	Minor		
									_
	NFORMATION								
En	f./Case ID No.				No.	of Violations			
		2022-0636-PWS				Order Type			
Med		Public Water Sup	oply			t/Non-Profit			
	Multi-Media				Enf.	Coordinator			
			150	T 1		EC's Team	Enforcement Te	am 4	
Adr	min. Penalty \$ 1	Limit Minimum	\$50	Maximum	\$5,000				_
			Penal	ty Calcula	tion Secti	on			
TOTAI	L BASE PENA	LTY (Sum of	violation	base penalt	ies)		Subtotal 1	\$50	0
A D 1116	CTMENTS ()	/	TAL 1						
ADJUS	SUNTENIS (+	/-) TO SUBTO otained by multiplying	JIAL I	Populty (Subtotal 1) by the indicated r	norcontago			
	Compliance Hi		the rotal base	0.0%	Adjustment		tals 2, 3, & 7	•	50
	Compliance in	Story		0.0 70	Aujustinent	Subto		٠ ٢	
	Notes		No adjustm	ent for compliar	nce history				
	Notes		no aajastiii	circ for compilar	ice miscory.				
	Culpability	No		0.0%	Enhancement		Subtotal 4	4	<u> </u>
	Notes	The Re	spondent do	es not meet the	culpability crit	eria.			
							_		
	Good Faith Eff	ort to Comply T	otal Adjustr	nents			Subtotal 5	-\$5	<u>0</u>
	Economic Bend	ofi+		0.00/-	Enhancement*		Subtotal 6	d	50
	LCOHOINIC BEIN	Total FB Amounts	¢1	_	timancement™ If at the Total FB \$	Amount	Subtotal 0		<u>, U</u>

Estimated Cost of Compliance \$200 **SUM OF SUBTOTALS 1-7** \$450 Final Subtotal

OTHER FACTORS AS JUSTICE MAY REQUIRE
Reduces or enhances the Final Subtotal by the indicated percentage. 0.0% Adjustment **\$0**

Notes Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty \$450

\$450

DEFERRAL 0.0% **\$0** Reduction Adjustment Reduces the Final Assessed Penalty by the indicated percentage.

No deferral is recommended for Findings Orders. Notes

PAYABLE PENALTY \$450

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

PCW

Respondent Staff Water Supply Corporation (PCW No. 2)

Case ID No. 62407

Reg. Ent. Reference No. RN101198711

Media Public Water Supply

Enf. Coordinator Ashley Lemke

		Compliance History Worksheet			
> Cc	ompliance Hist Component	ory <i>Site</i> 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%	
	11013	Other written NOVs	0	0%	
		Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	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%	
	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 (<i>number of counts</i>)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%	
	Audits	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%	
		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 (Sul	ototal 2) [0%
> Re	epeat Violator	(Subtotal 3)			
	N/A	Adjustment Per	centage (Sul	ototal 3)	0%
0-	·		, , , , , , , , , , , , , , , , , , ,		
· Co	N/A	ory Person Classification (Subtotal 7) Adjustment Perc	centage (Sul	ototal 7) [09
> Co	ompliance Hist	ory Summary			
	Compliance History Notes	No adjustment for compliance history.			
		Total Compliance History Adjustment Percentage (S	Subtotals 2.	3, & 7)	09
> Fin	al Compliance	History Adjustment		J, 47)	3 /
	-	Final Δdiustment Percent:	ane *cannod	at 100%	Λ0

Scr	eening Date	27-May-2022		Doc	ket No. 2022-0636-PWS-E	PCW
	•	Staff Water Sup	pply Corporati	on (PCW No. 2	2)	Policy Revision 5 (January 28, 2021)
	Case ID No.					PCW Revision February 11, 2021
Reg. Ent. Re						
- c		Public Water Su	ıpply			
	Coordinator		<u> </u>			
Viol	lation Number					
	Rule Cite(s)	30 Tex. Admin	. Code § 290.	110(b)(4) and 341.03	I (f)(6) and Tex. Health & Safety 15(c)	Code §
Violatio	on Description	("mg/L") free contributions ("	hlorine through ed each mont the disinfecta /L free chlorin	phout the distr th, for any two ant residual re te for the cons	ant residual of 0.2 milligrams per ibution system in more than 5.0% consecutive months. Specificall adings in the distribution system ecutive monthly periods of Octobaber and December 2021.	% of the y, more were
					Base I	Penalty \$5,000
>> Environme	ntal, Proper	ty and Huma		Matrix		
			Harm			
OR	Release Actual		Moderate	Minor		
	Potential		X		Percent 5.0%	
	. occirciai		A		3.0 70	
>>Programma	atic Matrix					
	Falsification	Major	Moderate	Minor		
					Percent 0.0%	
Notes	or contaminat	ted water to pers		numan health.	which would not exceed levels pro	\$4,750
Violation Even		/iolation Events	2		91 Number of violation da	\$250
	Number of v	daily weekly monthly quarterly semiannual annual single event	X		Violation Base I	
	Two	single events ar	e recommend	led (one for ea	ach set of consecutive months).	
Good Faith Eff	orts to Com	ply	10.0%		Re	duction \$50
		В	Sefore NOE/NOV	NOE/NOV to EDI	PRP/Settlement Offer	
		Extraordinary				
		Ordinary		Х		
		N/A				
		Notes	The Respond	ent achieved c	compliance on June 24, 2022.	
					Violation S	ubtotal \$450
Economic Ben	efit (EB) for	this violatio	n		Statutory Limit T	est
	Estimat	ed EB Amount		\$1	Violation Final Penalt	y Total \$450
			TL! ' '	-tion First C	named Daniello (= db) + 1.0	limita)
			i nis viol	ation Final As	ssessed Penalty (adjusted for	limits) \$450

	E	conomic	Benefit	Woi	rksheet		
Respondent	Staff Water St	upply Corporation	(PCW No. 2)				
Case ID No.	62407						
Reg. Ent. Reference No.	RN101198711						
	Public Water 9						Years of
Violation No.						Percent 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 Permit Costs				0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)	\$200	2-May-2022	24-Jun-2022	0.00	\$0 \$1	n/a	\$1
Notes for DELAYED costs	fewer than throughout t	The delayed cost includes the estimated amount for additional oversight and maintenance to ensure that fewer than 5.0% of the readings are below the minimum disinfectant residual of 0.2 mg/L free chlorine throughout the distribution system (\$100 x two sets of consecutive months), calculated from the date of the record review to the 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
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Notes for AVOIDED costs		<u> </u>		<u> 0.00</u>	1 \$0	50	\$0
Approx. Cost of Compliance		\$200			TOTAL		\$1

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 CN600636294, RN101198711, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Classification: NOT APPLICABLE

Rating: N/A

Rating: N/A

Customer, Respondent, CN600636294, Staff Water Supply Classification: NOT APPLICABLE

or Owner/Operator: Corporation

Regulated Entity: RN101198711, STAFF WSC FLATWOOD

AREA

Complexity Points: N/A Repeat Violator: N/A

CH Group: 14 - Other

Location: At the intersection of Highway 6 and County Road 278 near Eastland, Eastland County, Texas

TCEQ Region: REGION 03 - ABILENE

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0670030

Compliance History Period: September 01, 2018 to August 31, 2023 Rating Year: 2023 Rating Date: 09/01/2023

Date Compliance History Report Prepared: November 27, 2023 **Agency Decision Requiring Compliance History:** Enforcement

Component Period Selected: November 27, 2018 to November 27, 2023

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

Name: Ashley Lemke Phone: (512) 239-1118

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?

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

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

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1 December 12, 2019 (1616489)

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: $\ensuremath{\text{N/A}}$

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A

All NOVs Issued During Component Period 11/27/2018 and 11/27/2023

1 Date: 11/19/2020 (1690734)

Self Report? NO Classification: Minor

Citation:

30 TAC Chapter 290, SubChapter D 290.46(z)

Description: Failure to have a nitrification action plan (NAP).

Self Report? NO Classification: Minor

Citation:

30 TAC Chapter 290, SubChapter F 290.121(b)
30 TAC Chapter 290, SubChapter F 290.121(b)(1)
30 TAC Chapter 290, SubChapter F 290.121(b)(2)
30 TAC Chapter 290, SubChapter F 290.121(b)(2)(A)
30 TAC Chapter 290, SubChapter F 290.121(b)(2)(B)
30 TAC Chapter 290, SubChapter F 290.121(b)(4)
30 TAC Chapter 290, SubChapter F 290.121(b)(5)
30 TAC Chapter 290, SubChapter F 290.121(b)(6)

Description: Failure to include the sample schedule, frequency, compliance calculations, and

analytical procedures for Nitrates, Nitrites, and Asbestos in the monitoring plan.

2 Date: 08/20/2021 (1755682)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter D 290.46(I)

Description: Failure to flush dead-end lines monthly.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter D 290.44(d)(6)

Description: Failure to provide acceptable flush valves at all dead-end mains.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.110(c)(5) 30 TAC Chapter 290, SubChapter F 290.110(c)(5)(B)(i) 30 TAC Chapter 290, SubChapter F 290.110(c)(5)(B)(ii) 30 TAC Chapter 290, SubChapter F 290.110(c)(5)(B)(iii) 30 TAC Chapter 290, SubChapter F 290.110(c)(5)(D) 30 TAC Chapter 290, SubChapter F 290.110(c)(5)(D)(i) 30 TAC Chapter 290, SubChapter F 290.110(c)(5)(D)(ii)

Description: Failure to perform chloramine effectiveness sampling at the required frequency.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.110(b)(2) 30 TAC Chapter 290, SubChapter F 290.110(b)(4)

Description: Failure to maintain a total chlorine of 0.5 mg/L at the entry point and in

distribution.

3 Date: 10/22/2021 (1812751)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.115(f)(1)

Description: TTHM LRAA MCL 3Q2021 - During the 3rd quarter of 2021 the system violated

the maximum contaminant level for trihalomethanes with a LRAA of 0.084 mg/L at SH 6 and CR 278, Eastland (DBP2-01) and with a LRAA of 0.092 mg/L at 801 CR 313, Eastland (DBP2-02). HAA5 LRAA MCL 3Q2021 - During the 3rd quarter of 2021 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.065 mg/L at SH 6 and CR 278, Eastland (DBP2-01). ETT Point

Value = 5

4 Date: 12/15/2021 (1812751)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.115(f)(1)

Description: TTHM LRAA MCL 4Q2021 - During the 4th quarter of 2021 the system violated

the maximum contaminant level for trihalomethanes with a LRAA of 0.098 mg/L at SH 6 and CR 278, Eastland (DBP2-01) and with a LRAA of 0.108 mg/L at 801 CR 313, Eastland (DBP2-02). HAA5 LRAA MCL 4Q2021 - During the 4th quarter of 2021 the system violated the maximum contaminant level for haloacetic acids with a LRAA of 0.070 mg/L at SH 6 and CR 278, Eastland (DBP2-01). ETT Point

Value = 5

5 Date: 03/29/2022 (1812751)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.110(b)(4) 30 TAC Chapter 290, SubChapter F 290.110(f)(6)

Description: Non-Acute TT Violation NOV/2021 and DEC/2021 -The system failed to maintain

sufficient chlorine residual in more than five percent of the monthly disinfectant

residual samples for two consecutive months. ETT Point Value = 0.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.110(b)(4) 30 TAC Chapter 290, SubChapter F 290.110(f)(6)

Description: Non-Acute TT Violation OCT/2021 and NOV/2021 -The system failed to maintain

sufficient chlorine residual in more than five percent of the monthly disinfectant

residual samples for two consecutive months. ETT Point Value = 0.

6 Date: 04/12/2022 (1812751)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.115(f)(1)

Description: TTHM LRAA MCL 1Q2022 – During the 1st quarter of 2022 the system violated

the MCL for trihalomethanes with a LRAA of 0.109 mg/L at SH 6 and CR 278, Eastland (DBP2-01) and with a LRAA of 0.112 mg/L at 801 CR 313, Eastland (DBP2-02). HAA5 LRAA MCL 1Q2022 - During the 1st quarter of 2022 the system violated the MCL for haloacetic acids with a LRAA of 0.076 mg/L at SH 6 and CR 278, Eastland (DBP2-01) and with a LRAA of 0.062 mg/L at 801 CR 313, Eastland

(DBP2-02). ETT Point Value = 5

Appendix B

All Investigations Conducted During Component Period November 27, 2018 and November 27, 2023

Item 1*	December 12, 2019**	(1616489)
Item 2	November 19, 2020**	(1690734)
Item 3	August 19, 2021**	(1755028)
Item 4	February 28, 2022**	(1796189)
Item 5	May 11, 2022**	(1812751)
Item 6	May 13, 2022**	(1813059)
Item 7	May 31, 2022**	(1818442)

^{*} No violations documented during this investigation

^{*} NOVs applicable for the Compliance History rating period 9/1/2018 to 8/31/2023

^{**}Investigation applicable for the Compliance History Rating period between 09/01/2018 and 08/31/2023.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN § BEFORE THE
ENFORCEMENT ACTION §
CONCERNING § TEXAS COMMISSION ON
STAFF WATER SUPPLY §
CORPORATION §
RN101198711 § ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2022-0636-PWS-E

On	, the Texas Commission on Environmental Quality ("the
Commission" or "	CEQ") considered this agreement of the parties, resolving an enforcement
action regarding S	ff Water Supply Corporation (the "Respondent") under the authority of Tex.
HEALTH & SAFETY C	DE ch. 341. The Executive Director of the TCEQ, through the Enforcement
Division, and the l	spondent presented this Order to the Commission.

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

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

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

I. FINDINGS OF FACT

- 1. The Respondent owns and operates a public water supply located at the intersection of Highway 6 and County Road 278 near Eastland, Eastland County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 90 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 Tex. Admin. Code § 290.38(71).
- 2. During a record review for the Facility conducted on May 2, 2022 through May 13, 2022, an investigator documented that:
 - a. The locational running annual average concentrations of total trihalomethanes ("TTHM") for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 were 0.084 milligrams per liter ("mg/L") for the third quarter of 2021, 0.098 mg/L for the fourth quarter of 2021, and 0.109 mg/L for the first quarter of 2022 and at Site 2 were 0.092 mg/L for the third quarter of 2021, 0.108 mg/L for the fourth quarter of 2021, and 0.112 mg/L for the first quarter of 2022.
 - b. The locational running annual average concentrations of haloacetic acids ("HAA5") for DBP2 at Site 1 were 0.065 mg/L for the third quarter of 2021, 0.070

- mg/L for the fourth quarter of 2021, and 0.076 mg/L for the first quarter of 2022 and at Site 2 were 0.062 mg/L for the first quarter of 2022.
- c. More than 5.0% of the disinfectant residual readings in the distribution system were below 0.2 mg/L free chlorine for the consecutive monthly periods of October and November 2021 and November and December 2021.
- 3. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Facility:
 - a. By June 24, 2022, maintained a minimum disinfectant residual of 0.2 mg/L free chlorine throughout the distribution system in more than 5.0% of the samples collected each month, for two consecutive months at the Facility; and
 - b. By August 25, 2022, complied with the maximum contaminant level ("MCL") for TTHM and HAA5.

II. CONCLUSIONS OF LAW

- 1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to Tex. Health & Safety Code ch. 341 and the rules of the TCEQ.
- 2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to comply with the MCL of 0.080 mg/L for TTHM, based on the locational running annual average, in violation of 30 Tex. Admin. Code § 290.115(f)(1) and Tex. Health & Safety Code § 341.0315(c).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to comply with the MCL of 0.060 mg/L for HAA5, based on the locational running annual average, in violation of 30 Tex. Admin. Code § 290.115(f)(1) and Tex. Health & Safety Code § 341.0315(c).
- 4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to maintain a minimum disinfectant residual of 0.2 mg/L free chlorine throughout the distribution system in more than 5.0% of the samples collected each month, for any two consecutive months, in violation of 30 Tex. Admin. Code § 290.110(b)(4) and (f)(6) and Tex. Health & Safety Code § 341.0315(c).
- 5. Pursuant to Tex. Health & Safety Code § 341.049(a), the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 6. An administrative penalty in the amount of \$4,950 is justified by the facts recited in this Order, and considered in light of the factors set forth in Tex. Health & Safety Code § 341.049(b). The Respondent paid \$450 of the penalty. The TCEQ has determined that Conclusion of Law Nos. 2 and 3 of this Order qualify for 100% deferral. Therefore, the remaining amount of \$4,500 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any requirement contained in

Staff Water Supply Corporation DOCKET NO. 2022-0636-PWS-E Page 3

this Order, the Executive Director may demand payment of all or part of the conditionally deferred penalty.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 6 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Staff Water Supply Corporation, Docket No. 2022-0636-PWS-E" to:

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

- 2. All relief not expressly granted in this Order is denied.
- 3. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 4. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 5. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
- 6. 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.
- 7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

Staff Water Supply Corporation DOCKET NO. 2022-0636-PWS-E Page 4

- 8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under Tex. Bus. Org. Code § 1.002.
- 9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

Staff Water Supply Corporation DOCKET NO. 2022-0636-PWS-E Page 5

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
Λ	
Ch +1	3/22/2024
For the Executive Director	Date

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

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

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

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

Name (Printed or typed)

Authorized Representative of

Staff Water Supply Corporation

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