

**Executive Summary – Enforcement Matter – Case No. 58826**  
**Bell-Milam-Falls Water Supply Corporation**  
**RN101233922**  
**Docket No. 2022-1618-PWS-E**

**Order Type:**

Findings Agreed Order

**Findings Order Justification:**

A violation of a commission issued enforcement order or court order.

**Media:**

PWS

**Small Business:**

Yes

**Location(s) Where Violation(s) Occurred:**

Bell Milam Falls WSC, 462 West Farm-to-Market Road 485, Cameron, Bell 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:** June 14, 2024

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$8,819

**Total Paid to General Revenue:** \$8,819

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

Payment Plan: N/A

**Compliance History Classifications:**

Person/CN - N/A

Site/RN - N/A

**Major Source:** Yes

**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:** October 12, 2022 through October 13, 2022

**Date(s) of NOE(s):** November 10, 2022

***Violation Information***

1. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment [30 TEX. ADMIN. CODE § 290.46(m) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.a.iii].

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2. Failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled [30 TEX. ADMIN. CODE § 290.110(c)(5) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.a.i].
3. Failed to obtain an exception prior to using blended water containing free chlorine and water containing chloramines [30 TEX. ADMIN. CODE § 290.42(e)(3)(G) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.c.ii].
4. Failed to ensure that clearwells and potable water storage tanks, including associated appurtenances such as valves, pipes, and fittings, are thoroughly tight against leakage [30 TEX. ADMIN. CODE § 290.43(c)(6)].
5. Failed to ensure all potable water storage tanks and pressure maintenance facilities are installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates [30 TEX. ADMIN. CODE § 290.43(e)].
6. Failed to create a nitrification action plan for all systems distributing chloraminated water [30 TEX. ADMIN. CODE § 290.46(z)].
7. Failed to maintain a disinfectant residual of at least 0.5 milligrams per liter (“mg/L”) of chloramine (measured as total chlorine) throughout the distribution system [30 TEX. ADMIN. CODE §§ 290.46(d)(2)(B) and 290.110(b)(4) and TEX. HEALTH & SAFETY CODE § 341.0315(c)].
8. Failed to maintain the Facility's storage tanks in strict accordance with current American Water Works Association (“AWWA”) standards with an overflow pipe that terminates downward with a gravity-hinged and weighted cover tightly fitted with no gap over 1/16 inch, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(3).
9. Failed to provide the ground storage tank (“GST”) with a gooseneck roof vent or a roof ventilator designed by an engineer and installed in strict accordance with AWWA standards and equipped with a corrosion-resistant 16-mesh or finer screen [30 TEX. ADMIN. CODE § 290.43(c)(1)].
10. Failed to provide two or more service pumps having a total capacity of 2.0 gallons per minute (“gpm”) per connection [30 TEX. ADMIN. CODE § 290.45(b)(1)(D)(iii) and 290.45(b)(1)(C)(i) and TEX. HEALTH & SAFETY CODE § 341.0315(c)].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

The Respondent implemented the following corrective measures:

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**Docket No. 2022-1618-PWS-E**

- a. On October 20, 2022, the chloramine disinfectant residual was raised to 1.29 mg/L;
- b. On October 21, 2022, the overflow on the GST at the Crooked Creek Plant was repaired;
- c. On October 21, 2022, the roof vent was re-installed on the top of the GST at the Crooked Creek Plant;
- d. On April 26, 2023, the leak at the Wilson Plant was repaired;
- e. On March 26, 2024, the trees over the pressure tank at the Academy Plant were removed;
- f. On March 26, 2024, chloramine effectiveness sampling to ensure that monochloramine is the prevailing species and that nitrification is controlled was conducted;
- g. On March 26, 2024, the barbed wire on the front portion of the Wilson Plant fence was installed; and
- h. On March 29, 2024, submitted a nitrification action plan.

**Technical Requirements:**

The Order will require the Respondent to:

- a. Within 90 days, obtain an exception from the Executive Director for the use of blended water containing chloramines and water containing free chlorine or cease blending;
- b. Within 105 days, submit written certification to demonstrate compliance with a.;
- c. Within 180 days, provide two or more service pumps with a total capacity of at least 2.0 gpm per connection at the Davilla Pressure Plane and Rogers Pressure Plane and at least 0.6 gpm per connection of production capacity at the Wilson Plant Pressure Plane; and
- d. Within 195 days, submit written certification to demonstrate compliance with c.

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**Bell-Milam-Falls Water Supply Corporation**  
**RN101233922**  
**Docket No. 2022-1618-PWS-E**

***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Samantha Salas, Enforcement Division, Enforcement Team 5, MC 219, (512) 239-1543; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

**Respondent:** John Barfield, President, Bell-Milam-Falls Water Supply Corporation, P.O. Box 150, Cameron, Texas 76520

**Respondent's Attorney:** N/A



# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

<b>DATES</b>	<b>Assigned</b>	7-Nov-2022		
	<b>PCW</b>	30-Nov-2022	<b>Screening</b>	22-Nov-2022
			<b>EPA Due</b>	

<b>RESPONDENT/FACILITY INFORMATION</b>				
<b>Respondent</b>	Bell-Milam-Falls Water Supply Corporation			
<b>Reg. Ent. Ref. No.</b>	RN101233922			
<b>Facility/Site Region</b>	9-Waco	<b>Major/Minor Source</b>	Major	

<b>CASE INFORMATION</b>				
<b>Enf./Case ID No.</b>	58826	<b>No. of Violations</b>	10	
<b>Docket No.</b>	2022-1618-PWS-E	<b>Order Type</b>	Findings	
<b>Media Program(s)</b>	Public Water Supply	<b>Government/Non-Profit</b>	Yes	
<b>Multi-Media</b>		<b>Enf. Coordinator</b>	Samantha Salas	
		<b>EC's Team</b>	Enforcement Team 5	
<b>Admin. Penalty \$</b>	<b>Limit Minimum</b>	\$50	<b>Maximum</b>	\$5,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>	<b>Subtotal 1</b>	\$6,900
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### ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

<b>Compliance History</b>	40.0%	Adjustment	<b>Subtotals 2, 3, &amp; 7</b>	\$2,760
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<b>Notes</b>	Enhancement for two agreed orders containing a denial of liability.			
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<b>Culpability</b>	No	0.0%	Enhancement	<b>Subtotal 4</b>	\$0
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<b>Notes</b>	The Respondent does not meet the culpability criteria.			
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<b>Good Faith Effort to Comply Total Adjustments</b>	<b>Subtotal 5</b>	-\$841
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<b>Economic Benefit</b>	0.0%	Enhancement*	<b>Subtotal 6</b>	\$0
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Total EB Amounts	\$1,553	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$11,930	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$8,819
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

<b>Notes</b>		<b>Final Penalty Amount</b>	\$8,819
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$8,819
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<b>DEFERRAL</b>	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

<b>Notes</b>	No deferral is recommended for Findings Orders.			
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<b>PAYABLE PENALTY</b>	\$8,819
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Screening Date

22-Nov-2022

Docket No.

2022-1618-PWS-E

PCW

Respondent

Bell-Milam-Falls Water Supply Corporation

Case ID No.

58826

Reg. Ent. Reference No.

RN101233922

Media

Public Water Supply

Enf. Coordinator

Samantha Salas

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Compliance History Worksheet				
>> Compliance History Site Enhancement (Subtotal 2)				
Component	Number of...	Number	Adjust.	
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	0	0%	
	Other written NOVs	0	0%	
Orders	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	2	40%	
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%	
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%	
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%	
Emissions	Chronic excessive emissions events ( <i>number of events</i> )	0	0%	
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )	0	0%	
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%	
Other	Environmental management systems in place for one year or more	No	0%	
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
	Participation in a voluntary pollution reduction program	No	0%	
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
		Adjustment Percentage (Subtotal 2)		40%
>> 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	Enhancement for two agreed orders containing a denial of liability.			
		Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)		40%
>> Final Compliance History Adjustment				
		Final Adjustment Percentage *capped at 100%		40%

Screening Date		22-Nov-2022	Docket No.		2022-1618-PWS-E	PCW	
Respondent		Bell-Milam-Falls Water Supply Corporation				Policy Revision 5 (January 28, 2021)	
Case ID No.		58826					PCW Revision February 11, 2021
Reg. Ent. Reference No.		RN101233922					
Media		Public Water Supply					
Enf. Coordinator		Samantha Salas					
Violation Number		1					
Rule Cite(s)		30 Tex. Admin. Code § 290.46(m) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.a.iii					
Violation Description		Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, there were trees hanging over the pressure tank at the Academy Plant.					
						Base Penalty	\$5,000
>> Environmental, Property and Human Health Matrix							
OR	Release		Harm				
		Major	Moderate	Minor			
	Actual						
	Potential			x	Percent	7.0%	
>> Programmatic Matrix							
	Falsification	Major	Moderate	Minor			
					Percent	0.0%	
Matrix Notes	Failure to maintain the good working condition and general appearance of the Facility could expose persons served by the Facility to insignificant amounts of contaminants which would not exceed levels protective of human health.						
						Adjustment	\$4,650
							\$350
Violation Events							
Number of Violation Events		1		602		Number of violation days	
	daily						
	weekly						
	monthly						
	quarterly						
	semiannual						
	annual						
	single event	x		Violation Base Penalty			
							\$350
One single event is recommended.							
Good Faith Efforts to Comply		10.0%		Reduction		\$35	
	Extraordinary			Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer			
	Ordinary			x			
	N/A						
	Notes	The Respondent achieved compliance on March 26, 2024.					
						Violation Subtotal	\$315
Economic Benefit (EB) for this violation				Statutory Limit Test			
Estimated EB Amount		\$7		Violation Final Penalty Total		\$455	
This violation Final Assessed Penalty (adjusted for limits)						\$455	

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$50	30-Mar-2021	26-Mar-2024	2.99	\$7	n/a	\$7
Notes for DELAYED costs	They delayed cost includes the estimated amount to clear the trees over the pressure tank at the Academy Plant, calculated from the effective date of TCEQ Agreed Order Docket No. 2020-0113-PWS-E to the date of compliance.						

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

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

Approx. Cost of Compliance	\$50	TOTAL	\$7
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Screening Date		22-Nov-2022		Docket No.		2022-1618-PWS-E		PCW			
Respondent		Bell-Milam-Falls Water Supply Corporation						Policy Revision 5 (January 28, 2021)			
Case ID No.		58826						PCW Revision February 11, 2021			
Reg. Ent. Reference No.		RN101233922									
Media		Public Water Supply									
Enf. Coordinator		Samantha Salas									
Violation Number		2									
Rule Cite(s)		30 Tex. Admin. Code § 290.110(c)(5) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.a.i									
Violation Description		Failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled.									
Base Penalty								\$5,000			
>> Environmental, Property and Human Health Matrix											
OR		Release		Major		Moderate		Minor			
		Actual									
		Potential						x			
Percent								7.0%			
>> Programmatic Matrix											
Matrix Notes		Falsification		Major		Moderate		Minor			
Percent								0.0%			
		Failure to conduct chloramine effectiveness sampling could lead to nitrification in the distribution system which could expose persons served by the Facility to an insignificant amount of contaminants which would not exceed levels protective of human health.									
Adjustment								\$4,650			
								\$350			
Violation Events											
Number of Violation Events		1		602		Number of violation days					
		daily									
		weekly									
		monthly									
		quarterly									
		semiannual									
		annual									
		single event		x							
Violation Base Penalty								\$350			
One single event is recommended.											
Good Faith Efforts to Comply				10.0%		Reduction		\$35			
		Before NOE/NOV		NOE/NOV to EDPRP/Settlement Offer							
		Extraordinary									
		Ordinary		x							
		N/A									
		Notes		The Respondent achieved compliance on March 26, 2024.							
Violation Subtotal								\$315			
Economic Benefit (EB) for this violation											
Statutory Limit Test											
Estimated EB Amount				\$30		Violation Final Penalty Total				\$455	
This violation Final Assessed Penalty (adjusted for limits)								\$455			

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	\$200	30-Mar-2021	26-Mar-2024	2.99	\$30	n/a	\$30
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing species and that nitrification is controlled, calculated from the effective date of TCEQ Agreed Order Docket No. 2020-0113-PWS-E to the date of compliance.						

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

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

Approx. Cost of Compliance	\$200	TOTAL	\$30
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<b>Screening Date</b>	22-Nov-2022	<b>Docket No.</b>	2022-1618-PWS-E	<b>PCW</b>
<b>Respondent</b>	Bell-Milam-Falls Water Supply Corporation			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	58826			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN101233922			
<b>Media</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Samantha Salas			
<b>Violation Number</b>	3			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code § 290.42(e)(3)(G) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.c.ii			
<b>Violation Description</b>	Failed to obtain an exception, in accordance with 30 Tex. Admin. Code § 290.39(l), prior to using blended water containing free chlorine and water containing chloramines. Specifically, the Respondent blended ground water containing free chlorine with chloraminated water received from Central Texas Water Supply Corporation and had not obtained an exception.			
		<b>Base Penalty</b>	\$5,000	

>> Environmental, Property and Human Health Matrix

OR

	<b>Release</b>	<b>Harm</b>	
		Major	Moderate
	Actual		
	Potential		x

Percent 7.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Failure to obtain an exception to blend water containing free chlorine and water containing chloramines could expose persons served by the Facility to an insignificant amount of contaminants which would not exceed levels protective of human health.

Adjustment \$4,650

\$350

Violation Events

Number of Violation Events 1

602

Number of violation days

	daily	
	weekly	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	x

Violation Base Penalty \$350

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

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

Notes

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

Violation Subtotal \$350

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$17

Violation Final Penalty Total \$490

This violation Final Assessed Penalty (adjusted for limits) \$490

Economic Benefit Worksheet

Respondent Bell-Milam-Falls Water Supply Corporation  
Case ID No. 58826  
Reg. Ent. Reference No. RN101233922  
Media Public Water Supply  
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$100	30-Mar-2021	14-Aug-2024	3.38	\$17	n/a	\$17
Notes for DELAYED costs	The delayed cost includes the estimated amount to obtain an exception for the use of blended water containing free chlorine and water containing chloramines, calculated from the effective date of TCEQ Agreed Order Docket No. 2020-0113-PWS-E to the estimated date of compliance						

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

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

Approx. Cost of Compliance	\$100	TOTAL	\$17
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<b>Screening Date</b> 22-Nov-2022		<b>Docket No.</b> 2022-1618-PWS-E		<b>PCW</b>	
<b>Respondent</b> Bell-Milam-Falls Water Supply Corporation		<i>Policy Revision 5 (January 28, 2021)</i>			
<b>Case ID No.</b> 58826		<i>PCW Revision February 11, 2021</i>			
<b>Reg. Ent. Reference No.</b> RN101233922					
<b>Media</b> Public Water Supply					
<b>Enf. Coordinator</b> Samantha Salas					
<b>Violation Number</b>		4			
<b>Rule Cite(s)</b>		30 Tex. Admin. Code § 290.43(c)(6)			
<b>Violation Description</b>		Failed to ensure that clearwells and potable water storage tanks, including associated appurtenances such as valves, pipes, and fittings, are thoroughly tight against leakage. Specifically, the associated appurtenances located near the ground storage tank ("GST") were leaking at the Wilson Plant.			
		<b>Base Penalty</b>		\$5,000	
>> Environmental, Property and Human Health Matrix					
OR	<b>Release</b>		<b>Harm</b>		
	Major	Moderate	Minor		
	Actual				
	Potential		x		<b>Percent</b> 15.0%
>>Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					<b>Percent</b> 0.0%
Matrix Notes	Failure to ensure that the associated appurtenances are thoroughly tight against leaking could expose persons served by the Facility to a significant amount of contaminants which would not exceed levels protective of human health.				
		<b>Adjustment</b>		\$4,250	
				\$750	
Violation Events					
Number of Violation Events		1		41 Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly	x		<b>Violation Base Penalty</b> \$750	
	semiannual				
	annual				
	single event				
One quarterly event is recommended, calculated from the October 12, 2022 investigation date to the November 22, 2022 screening date.					
<b>Good Faith Efforts to Comply</b>		10.0%		<b>Reduction</b> \$75	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer			
	Extraordinary				
	Ordinary	x			
	N/A				
	Notes	The Respondent achieved compliance on April 26, 2023.			
		<b>Violation Subtotal</b>		\$675	
Economic Benefit (EB) for this violation					
		<b>Statutory Limit Test</b>			
<b>Estimated EB Amount</b>		\$13		<b>Violation Final Penalty Total</b> \$975	
		<b>This violation Final Assessed Penalty (adjusted for limits)</b>		\$975	

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$500	12-Oct-2022	26-Apr-2023	0.54	\$13	n/a	\$13
Notes for DELAYED costs	The delayed cost includes the estimated amount to ensure that the GST at the Wilson Plant, including associated appurtenances such as valves, pipes, and fittings, are thoroughly tight against leakage, calculated from the date of the investigation to the date of compliance.						

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

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

Approx. Cost of Compliance	\$500	TOTAL	\$13
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Screening Date

22-Nov-2022

Docket No.

2022-1618-PWS-E

PCW

Respondent

Bell-Milam-Falls Water Supply Corporation

Case ID No.

58826

Reg. Ent. Reference No.

RN101233922

Media

Public Water Supply

Enf. Coordinator

Samantha Salas

Violation Number

5

Rule Cite(s)

30 Tex. Admin. Code § 290.43(e)

Violation Description

Failed to ensure all potable water storage tanks and pressure maintenance facilities are installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates. Specifically, the barbed wire on the front portion of the fence at the Wilson Plant was missing.

Base Penalty

\$5,000

>> Environmental, Property and Human Health Matrix

OR

Release

Major

Moderate

Minor

Actual

Potential

x

Percent

7.0%

>>Programmatic Matrix

Falsification

Major

Moderate

Minor

Percent

0.0%

Matrix Notes

Failure to protect the potable water storage tanks and pressure maintenance facilities could expose person served by the Facility to an insignificant amount of contaminant which would not exceed levels protective of human health.

Adjustment

\$4,650

\$350

Violation Events

Number of Violation Events

1

41

Number of violation days

daily

weekly

monthly

quarterly

semiannual

annual

single event

x

Violation Base Penalty

\$350

One single event is recommended.

Good Faith Efforts to Comply

10.0%

Reduction

\$35

Before NOE/NOV

NOE/NOV to EDPRP/Settlement Offer

Extraordinary

Ordinary

x

N/A

Notes

The Respondent achieved compliance on March 26, 2024.

Violation Subtotal

\$315

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

\$10

Violation Final Penalty Total

\$455

This violation Final Assessed Penalty (adjusted for limits)

\$455

Economic Benefit Worksheet

Respondent Bell-Milam-Falls Water Supply Corporation  
Case ID No. 58826  
Reg. Ent. Reference No. RN101233922  
Media Public Water Supply  
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$100	12-Oct-2022	26-Mar-2024	1.45	\$0	\$10	\$10
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to install barbed wire on the front portion of the fence at the Wilson Plant, calculated from the date of the investigation to the date of compliance.						

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

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

Approx. Cost of Compliance	\$100	TOTAL	\$10
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Screening Date

22-Nov-2022

Docket No.

2022-1618-PWS-E

PCW

Respondent

Bell-Milam-Falls Water Supply Corporation

Case ID No.

58826

Reg. Ent. Reference No.

RN101233922

Media

Public Water Supply

Enf. Coordinator

Samantha Salas

Violation Number

6

Rule Cite(s)

30 Tex. Admin. Code § 290.46(z)

Violation Description

Failed to create a nitrification action plan for all systems distributing chloraminated water.

Base Penalty

\$5,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent

0.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor
	x		

Percent

20.0%

Matrix Notes

100% of the rule requirement was not met.

Adjustment

\$4,000

\$1,000

Violation Events

Number of Violation Events

1

41

Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty

\$1,000

One single event is recommended.

Good Faith Efforts to Comply

10.0%

Reduction

\$100

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

Notes

The Respondent achieved compliance on March 29, 2024.

Violation Subtotal

\$900

Economic Benefit (EB) for this violation

Estimated EB Amount

\$13

Violation Final Penalty Total

\$1,300

This violation Final Assessed Penalty (adjusted for limits)

\$1,300

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 6

Percent Interest	Years of Depreciation
5.0	15

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

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				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	12-Oct-2022	29-Mar-2024	1.46	\$13	n/a	\$13
Notes for DELAYED costs	The delayed cost includes the estimated amount to create a nitrification action plan, calculated from the date of the investigation to the date of compliance.						

Avoided Costs

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

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

Approx. Cost of Compliance	\$180	TOTAL	\$13
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<b>Screening Date</b>	22-Nov-2022	<b>Docket No.</b>	2022-1618-PWS-E	<b>PCW</b>	
<b>Respondent</b>	Bell-Milam-Falls Water Supply Corporation			<i>Policy Revision 5 (January 28, 2021)</i>	
<b>Case ID No.</b>	58826			<i>PCW Revision February 11, 2021</i>	
<b>Reg. Ent. Reference No.</b>	RN101233922				
<b>Media</b>	Public Water Supply				
<b>Enf. Coordinator</b>	Samantha Salas				
<b>Violation Number</b>	7				
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 290.46(d)(2)(B) and 290.110(b)(4) and Tex. Health & Safety Code § 341.0315(c)				
<b>Violation Description</b>	Failed to maintain a disinfectant residual of at least 0.5 milligrams per liter ("mg/L") of chloramine (measured as total chlorine) throughout the distribution system. Specifically, on October 12, 2022, a total chlorine concentration of 0.01 mg/L was measured at the flush valve located at 855 Capital Lane.				
		<b>Base Penalty</b>	\$5,000		
<b>&gt;&gt; Environmental, Property and Human Health Matrix</b>					
<b>OR</b>	<b>Release</b>	Major	Moderate	Minor	
	Actual				
	Potential		x		<b>Percent</b> 15.0%
<b>&gt;&gt; Programmatic Matrix</b>					
	Falsification	Major	Moderate	Minor	
					<b>Percent</b> 0.0%
Matrix Notes	Failure to maintain proper levels of disinfection could expose persons served by the Facility to a significant amount of contaminants which would not exceed levels protective of human health.				
		<b>Adjustment</b>	\$4,250		
			\$750		
<b>Violation Events</b>					
	Number of Violation Events	1	8	Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly	x			<b>Violation Base Penalty</b> \$750
	semiannual				
	annual				
	single event				
	One quarterly event is recommended, calculated from the October 12, 2022 investigation date to the October 20, 2022 compliance date.				
<b>Good Faith Efforts to Comply</b>		25.0%		<b>Reduction</b>	\$187
	Extraordinary				
	Ordinary	x			
	N/A				
	Notes	The Respondent achieved compliance on October 20, 2022.			
		<b>Violation Subtotal</b>	\$563		
<b>Economic Benefit (EB) for this violation</b>			<b>Statutory Limit Test</b>		
	<b>Estimated EB Amount</b>	\$0	<b>Violation Final Penalty Total</b>	\$863	
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$863	

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 7

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$200	12-Oct-2022	20-Oct-2022	0.02	\$0	n/a	\$0
Notes for DELAYED costs	The Other (as needed) delayed cost includes the estimated amount to determine the cause of noncompliance, make any necessary repairs or adjustments to the Facility, and maintain a disinfectant residual of at least 0.5 mg/L total chlorine throughout the distribution system, calculated from the date of the investigation to the date of compliance.						

Avoided Costs

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

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

Approx. Cost of Compliance	\$200	TOTAL	\$0
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<b>Screening Date</b>	22-Nov-2022	<b>Docket No.</b>	2022-1618-PWS-E	<b>PCW</b>
<b>Respondent</b>	Bell-Milam-Falls Water Supply Corporation			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	58826			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN101233922			
<b>Media</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Samantha Salas			
<b>Violation Number</b>	8			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code § 290.43(c)(3)			
<b>Violation Description</b>	Failed to maintain the Facility's storage tanks in strict accordance with current American Water Works Association ("AWWA") standards with an overflow pipe that terminates downward with a gravity-hinged and weighted cover tightly fitted with no gap over 1/16 inch. Specifically, the end of the overflow piping was broken off of the GST at the Crooked Creek Plant.			
		<b>Base Penalty</b>	\$5,000	
>> Environmental, Property and Human Health Matrix				
OR	<b>Release</b>	<b>Harm</b>		
		Major Moderate Minor		
	Actual			
	Potential		x	
		<b>Percent</b>	15.0%	
>>Programmatic Matrix				
	Falsification	Major	Moderate	Minor
	<b>Percent</b>	0.0%		
Matrix Notes	Failure to provide the GST with an adequate overflow pipe could allow a significant amount of contaminants to enter the water supply which would not exceed levels protective of human health.			
	<b>Adjustment</b>	\$4,250		
			\$750	
Violation Events				
	Number of Violation Events	1	9	Number of violation days
	daily			
	weekly			
	monthly			
	quarterly	x		
	semiannual			
	annual			
	single event			
	<b>Violation Base Penalty</b>	\$750		
	One quarterly event is recommended, calculated from the October 12, 2022 investigation date to the October 21, 2022 compliance date.			
<b>Good Faith Efforts to Comply</b>	25.0%		<b>Reduction</b>	\$187
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary	x		
	N/A			
	Notes	The Respondent achieved compliance on October 21, 2022.		
	<b>Violation Subtotal</b>	\$563		
Economic Benefit (EB) for this violation				
Statutory Limit Test				
<b>Estimated EB Amount</b>	\$1	<b>Violation Final Penalty Total</b>	\$863	
<b>This violation Final Assessed Penalty (adjusted for limits)</b>				\$863

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 8

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$500	12-Oct-2022	21-Oct-2022	0.02	\$0	\$1	\$1
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to provide an adequate overflow pipe for the Crooked Creek GST, calculated from the date of the investigation to the date of compliance.						

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

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

Approx. Cost of Compliance	\$500	TOTAL	\$1
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Screening Date		22-Nov-2022		Docket No.		2022-1618-PWS-E		PCW			
Respondent		Bell-Milam-Falls Water Supply Corporation						Policy Revision 5 (January 28, 2021)			
Case ID No.		58826						PCW Revision February 11, 2021			
Reg. Ent. Reference No.		RN101233922									
Media		Public Water Supply									
Enf. Coordinator		Samantha Salas									
Violation Number		9									
Rule Cite(s)		30 Tex. Admin. Code § 290.43(c)(1)									
Violation Description		Failed to provide the GST with a gooseneck roof vent or a roof ventilator designed by an engineer and installed in strict accordance with AWWA standards and equipped with a corrosion-resistant 16-mesh or finer screen. Specifically, the roof vent was broken off of the top of the GST at the Crooked Creek Plant.									
		Base Penalty						\$5,000			
>> Environmental, Property and Human Health Matrix											
OR		Release		Major		Moderate		Minor			
		Actual									
		Potential				x					
								Percent		15.0%	
>> Programmatic Matrix											
Matrix Notes		Falsification		Major		Moderate		Minor			
								Percent		0.0%	
		Failure to provide a roof vent equipped with a corrosion-resistant 16-mesh on the GST could result in persons served by the Facility being exposed to a significant amount of contaminants which would not exceed levels protective of human health.									
		Adjustment						\$4,250			
								\$750			
Violation Events											
		Number of Violation Events		1		9		Number of violation days			
		daily									
		weekly									
		monthly									
		quarterly		x							
		semiannual									
		annual									
		single event									
		Violation Base Penalty						\$750			
		One quarterly event is recommended, calculated from the October 12, 2022 investigation date to the October 21, 2022 compliance date.									
Good Faith Efforts to Comply		25.0%				Reduction		\$187			
		Before NOE/NOV		NOE/NOV to EDPRP/Settlement Offer							
		Extraordinary									
		Ordinary		x							
		N/A									
		Notes		The Respondent achieved compliance on October 21, 2022.							
		Violation Subtotal						\$563			
Economic Benefit (EB) for this violation											
		Estimated EB Amount		\$0		Violation Final Penalty Total		\$863			
		This violation Final Assessed Penalty (adjusted for limits)						\$863			

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 9

Percent Interest	Years of Depreciation
5.0	15

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

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$100	12-Oct-2022	21-Oct-2022	0.02	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to provide a roof vent equipped with a corrosion-resistant 16-mesh or finer screen on the GST, calculated from the date of the investigation to the date of compliance.						

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

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

Approx. Cost of Compliance	\$100	TOTAL	\$0
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<b>Screening Date</b> 22-Nov-2022		<b>Docket No.</b> 2022-1618-PWS-E		<b>PCW</b>
<b>Respondent</b> Bell-Milam-Falls Water Supply Corporation		<i>Policy Revision 5 (January 28, 2021)</i>		
<b>Case ID No.</b> 58826		<i>PCW Revision February 11, 2021</i>		
<b>Reg. Ent. Reference No.</b> RN101233922				
<b>Media</b> Public Water Supply				
<b>Enf. Coordinator</b> Samantha Salas				
<b>Violation Number</b>	10			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code § 290.45(b)(1)(D)(iii) and 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c)			
<b>Violation Description</b>	<p>Failed to provide two or more service pumps having a total capacity of 2.0 gallons per minute ("gpm") per connection. Specifically, the Davilla Pressure Plane had 259 connections requiring a service pump capacity of 518 gpm. However, only 410 gpm of service pump capacity were provided, indicating a 20% deficiency. The Rogers Pressure Plane, which provides passthrough service to the Wilson Pressure Plane, had 612 connections requiring 2.0 gpm per connection for service pump capacity. The Wilson Pressure Plane had 101 connections requiring 0.6 gpm per connection for production capacity with a total required service pump capacity of 1,284 gpm. However, only 700 gpm of service pump capacity were provided to both pressure planes, indicating a 45% deficiency.</p>			
<b>Base Penalty</b>				\$5,000
<b>&gt;&gt; Environmental, Property and Human Health Matrix</b>				
<b>OR</b>	<b>Release</b>	<b>Harm</b>		
		Major	Moderate	Minor
	Actual			
	Potential		x	
<b>Percent</b>				15.0%
<b>&gt;&gt;Programmatic Matrix</b>				
	Falsification	Major	Moderate	Minor
<b>Percent</b>				0.0%
<b>Matrix Notes</b>	Failure to provide adequate service pump capacity could expose persons served by the Facility to a significant amount of contaminants that would not exceed levels protective of human health.			
<b>Adjustment</b>				\$4,250
				\$750
<b>Violation Events</b>				
Number of Violation Events		2	41	Number of violation days
	daily			
	weekly			
	monthly			
	quarterly	x		
	semiannual			
	annual			
	single event			
<b>Violation Base Penalty</b>				\$1,500
Two quarterly events are recommended (one per deficiency), calculated from the October 12, 2022 investigation date to the November 22, 2022 screening date.				
<b>Good Faith Efforts to Comply</b>		0.0%		Reduction
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary			
	N/A	x		
<b>Notes</b>	The Respondent does not meet the good faith criteria for this violation.			
<b>Violation Subtotal</b>				\$1,500
<b>Economic Benefit (EB) for this violation</b>		<b>Statutory Limit Test</b>		
<b>Estimated EB Amount</b>		\$1,462	<b>Violation Final Penalty Total</b>	
			\$2,100	
<b>This violation Final Assessed Penalty (adjusted for limits)</b>				\$2,100

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Bell-Milam-Falls Water Supply Corporation 58826 RN101233922 Public Water Supply 10

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$10,000	12-Oct-2022	12-Nov-2024	2.09	\$70	\$1,392	\$1,462
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to provide two or more service pumps with a total capacity of at least 2.0 gpm per connection at the Davilla Pressure Plane and Rogers Pressure Plane and to provide production capacity of at least 0.6 gpm per connection at the Wilson Pressure Plane, calculated from the date of the investigation to the estimated date of compliance.						

Avoided Costs

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

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

Approx. Cost of Compliance	\$10,000	TOTAL	\$1,462
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# Compliance History Report

Compliance History Report for CN600672943, RN101233922, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

<b>Customer, Respondent, or Owner/Operator:</b>	CN600672943, Bell-Milam-Falls Water Supply Corporation	<b>Classification:</b> NOT APPLICABLE	<b>Rating:</b> N/A
<b>Regulated Entity:</b>	RN101233922, BELL MILAM FALLS WSC	<b>Classification:</b> NOT APPLICABLE	<b>Rating:</b> N/A
<b>Complexity Points:</b>	N/A	<b>Repeat Violator:</b>	N/A
<b>CH Group:</b>	14 - Other		
<b>Location:</b>	462 WEST FARM-TO-MARKET ROAD 485 NEAR CAMERON, BELL COUNTY, TEXAS		
<b>TCEQ Region:</b>	REGION 09 - WACO		
<b>ID Number(s):</b>			
<b>PUBLIC WATER SYSTEM/SUPPLY REGISTRATION</b>	0140007		

<b>Compliance History Period:</b>	September 01, 2018 to August 31, 2023	<b>Rating Year:</b>	2023	<b>Rating Date:</b>	09/01/2023
<b>Date Compliance History Report Prepared:</b>	February 16, 2024				
<b>Agency Decision Requiring Compliance History:</b>	Enforcement				
<b>Component Period Selected:</b>	February 16, 2019 to February 16, 2024				
<b>TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.</b>					
<b>Name:</b>	Samantha Salas	<b>Phone:</b>	(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:**

- |   |  |  |
|---|--|--|
| 1 | Effective Date: 08/27/2020   | ADMINORDER 2018-1527-MLM-E (1660 Order-Agreed Order With Denial) |
|   | Classification: Minor  |  |
|   | Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)   |  |
|   | Description: Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, ground storage tank No. 2 at the Westphalia Plant was malfunctioning and continuously overflowing.  |  |
|   | Classification: Minor  |  |
|   | Citation: 2D TWC Chapter 26, SubChapter A 26.039(b)  |  |
|   | Description: Failed to ensure that whenever an accidental discharge or spill occurs at or from any activity or facility which causes or may cause pollution, the individual operating, in charge of, or responsible for the activity or facility notifies the commission as soon as possible and not later than 24 hours after the occurrence. |  |
|   | Classification: Moderate   |  |
|   | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)   |  |
|   | Description: Failed to obtain authorization to discharge industrial waste into or adjacent to any water in the state. Specifically, the Facility was discharging backwash wastewater from the water softener associated with the chlorination system at the Westphalia Plant without authorization.  |  |
| 2 | Effective Date: 03/30/2021   | ADMINORDER 2020-0113-PWS-E (1660 Order-Agreed Order With Denial) |
|   | Classification: Minor  |  |
|   | Citation: 30 TAC Chapter 290, SubChapter D 290.46(z)(4)  |  |
|   | Description: Failed to maintain a Nitrification Action Plan ("NAP") as a part of the system's monitoring plan, as required under 30 Tex. Admin. Code § 290.121. Specifically, the NAP was created on February 28, 2019 but was not   |  |

maintained onsite  
Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.110(c)(5)

Description: Failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(j)

Description: Failed to complete a Customer Service Inspection ("CSI") certificate prior to providing continuous water service to new construction or any existing service when the water purveyor has reason to believe cross-connections or other potential contamination hazards exists. Specifically, the Respondent did not have CSI certificates completed at new constructions at 3815 County Road ("CR") 104 and 13421 Shaw Road.

Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)

Description: Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, there were trees hanging over the pressure tank at the Academy Plant

Classification: Major

Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(B)

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

5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: Failed to maintain a disinfectant residual of at least 0.5 milligrams per liter ("mg/L") of chloramine (measured as total chlorine) throughout the distribution system at all times. Specifically, on November 15, 2019 a total chlorine residual concentration of 0.11 mg/L was collected at 228 CR 351 on the Davilla Pressure Plane and a total chlorine residual concentration of 0.0 mg/L was collected at the Capital Lane Flush Valve on the Wilson Pressure Plane

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(e)(3)(G)

Description: Failed to obtain an exception, in accordance with 30 Tex. Admin. Code § 290.39(l), prior to using blended water containing free chlorine and water containing chloramines. Specifically, the Respondent blended ground water containing free chlorine with chloraminated water received from Central Texas Water Supply Corporation and had not obtained an exception

## **B. Criminal convictions:**

N/A

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

N/A

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

Item 4	January 26, 2021	(1700632)
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## **E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):**

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

N/A

## **F. Environmental audits:**

N/A

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

N/A

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

N/A

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

N/A

## **J. Early compliance:**

N/A

## **Sites Outside of Texas:**

*Compliance History Report for CN600672943, RN101233922, Rating Year 2023 which includes Compliance History (CH) components from February 16, 2019, through February 16, 2024.*

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
BELL-MILAM-FALLS WATER SUPPLY  
CORPORATION  
RN101233922

§ BEFORE THE  
§  
§ TEXAS COMMISSION ON  
§  
§ ENVIRONMENTAL QUALITY  
§

## AGREED ORDER DOCKET NO. 2022-1618-PWS-E

On \_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Bell-Milam-Falls Water Supply Corporation (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

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

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

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

### I. FINDINGS OF FACT

1. The Respondent owns and operates a public water supply located at 462 West Farm-to-Market Road 485 near Cameron, Bell County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 2,150 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(73).
2. During an investigation at the Facility conducted on October 12, 2022 through October 13, 2022, an investigator documented that:
  - a. There were trees hanging over the pressure tank at the Academy Plant.
  - b. The Respondent did not conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled.

- c. The Respondent blended ground water containing free chlorine with chloraminated water received from Central Texas Water Supply Corporation and had not obtained an exception.
  - d. The associated appurtenances located near the ground storage tank ("GST") were leaking at the Wilson Plant.
  - e. The barbed wire on the front portion of the fence at the Wilson Plant was missing.
  - f. The Respondent did not create a nitrification action plan for all systems distributing chloraminated water.
  - g. On October 12, 2022, a total chlorine concentration of 0.01 milligrams per liter ("mg/L") was measured at the flush valve located at 855 Capital Lane.
  - h. The end of the overflow pipe was broken off of the GST overflow piping at the Crooked Creek Plant.
  - i. The roof vent was broken off of the top of the GST at the Crooked Creek Plant.
  - j. The Davilla Pressure Plane had 259 connections requiring a service pump capacity of 518 gallons per minute ("gpm"). However, only 410 gpm of service pump capacity were provided, indicating a 20% deficiency. The Rogers Pressure Plane, which provides passthrough service to the Wilson Pressure Plane, had 612 connections requiring 2.0 gpm per connection for service pump capacity. The Wilson Pressure Plane had 101 connections requiring 0.6 gpm per connection for production capacity with a total required service pump capacity of 1,284 gpm. However, only 700 gpm of service pump capacity were provided to both pressure planes, indicating a 45% deficiency.
3. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Facility:
- a. On October 20, 2022, the chloramine disinfectant residual was raised to 1.29 mg/L;
  - b. On October 21, 2022, the overflow on the GST at the Crooked Creek Plant was repaired;
  - c. On October 21, 2022, the roof vent was re-installed on the top of the GST at the Crooked Creek Plant;
  - d. On April 26, 2023, the leak at the Wilson Plant was repaired;
  - e. On March 26, 2024, the trees over the pressure tank at the Academy Plant were removed;

- f. On March 26, 2024, chloramine effectiveness sampling to ensure that monochloramine is the prevailing species and that nitrification is controlled was conducted;
- g. On March 26, 2024, the barbed wire on the front portion of the Wilson Plant fence was installed; and
- h. On March 29, 2024, submitted a nitrification action plan.

## 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 initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, in violation of 30 TEX. ADMIN. CODE § 290.46(m) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.a.iii.
3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to conduct chloramine effectiveness sampling to ensure that monochloramine is the prevailing chloramine species and that nitrification is controlled, in violation of 30 TEX. ADMIN. CODE § 290.110(c)(5) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.a.i.
4. As evidenced by Finding of Fact No. 2.c, the Respondent failed to obtain an exception, in accordance with 30 TEX. ADMIN. CODE § 290.39(l), prior to using blended water containing free chlorine and water containing chloramines, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(3)(G) and TCEQ Agreed Order Docket No. 2020-0113-PWS-E, Ordering Provision No. 2.c.ii.
5. As evidenced by Finding of Fact No. 2.d, the Respondent failed to ensure that clearwells and potable water storage tanks, including associated appurtenances such as valves, pipes, and fittings, are thoroughly tight against leakage, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(6).
6. As evidenced by Finding of Fact No. 2.e, the Respondent failed to ensure all potable water storage tanks and pressure maintenance facilities are installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates, in violation of 30 TEX. ADMIN. CODE § 290.43(e).
7. As evidenced by Finding of Fact No. 2.f, the Respondent failed to create a nitrification action plan for all systems distributing chloraminated water, in violation of 30 TEX. ADMIN. CODE § 290.46(z).
8. As evidenced by Finding of Fact No. 2.g, the Respondent failed to maintain a disinfectant residual of at least 0.5 mg/L of chloramine (measured as total chlorine)

throughout the distribution system, in violation of 30 TEX. ADMIN. CODE §§ 290.46(d)(2)(B) and 290.110(b)(4) and TEX. HEALTH & SAFETY CODE § 341.0315(c).

9. As evidenced by Finding of Fact No. 2.h, the Respondent failed to maintain the Facility's storage tanks in strict accordance with current American Water Works Association ("AWWA") standards with an overflow pipe that terminates downward with a gravity-hinged and weighted cover tightly fitted with no gap over 1/16 inch, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(3).
10. As evidenced by Finding of Fact No. 2.i, the Respondent failed to provide the GST with a gooseneck roof vent or a roof ventilator designed by an engineer and installed in strict accordance with AWWA standards and equipped with a corrosion-resistant 16-mesh or finer screen, in violation of 30 TEX. ADMIN. CODE § 290.43(c)(1).
11. As evidenced by Finding of Fact No. 2.j, the Respondent failed to provide two or more service pumps having a total capacity of 2.0 gpm per connection, in violation of 30 TEX. ADMIN. CODE § 290.45(b)(1)(D)(iii) and 290.45(b)(1)(C)(i) and TEX. HEALTH & SAFETY CODE § 341.0315(c).
12. 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.
13. An administrative penalty in the amount of \$8,819 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 the \$8,819 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. 13 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: Bell-Milam-Falls Water Supply Corporation, Docket No. 2022-1618-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. The Respondent shall undertake the following technical requirements:

- a. Within 90 days after the effective date of this Order, obtain an exception from the Executive Director for the use of blended water containing chloramines and water containing free chlorine pursuant to 30 TEX. ADMIN. CODE § 290.39(l), or cease blending, in accordance with 30 TEX. ADMIN. CODE § 290.42. The exception request shall be submitted to:

Technical Review and Oversight Team  
Water Supply Division, MC 159  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-30870

- b. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.d below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a.
- c. Within 180 days of the effective date of this Order, provide two or more service pumps with a total capacity of at least 2.0 gpm per connection at the Davilla Pressure Plane and Rogers Pressure Plane and at least 0.6 gpm per connection of production capacity at the Wilson Plant Pressure Plane, in accordance with 30 TEX. ADMIN. CODE § 290.45.
- d. Within 195 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.c. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

Water Section Manager  
Waco Regional Office  
Texas Commission on Environmental Quality  
6801 Sanger Avenue, Suite 2500  
Waco, Texas 76710-7826

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
9. 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.

10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

**SIGNATURE PAGE**

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

-----  
For the Commission

-----  
Date

  
-----  
For the Executive Director

6/24/2024

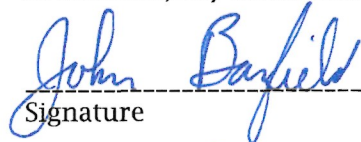
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Date

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.

  
-----  
Signature

5-15-24  
-----  
Date

John Barfield  
-----  
Name (Printed or typed)  
Authorized Representative of  
Bell-Milam-Falls Water Supply Corporation

President  
-----  
Title

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

**Instructions:** Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.