# Executive Summary – Enforcement Matter – Case No. 65071 Pritchett Water Supply Corporation RN101224608 Docket No. 2023-1663-PWS-E

Order Type:

1660 Agreed Order

**Findings Order Justification:** 

N/A **Media:** PWS

**Small Business:** 

No

Location(s) Where Violation(s) Occurred:

Pritchett WSC, located on State Highway 155 southwest of Gilmer, Gilmer, Upshur County

**Type of Operation:** 

Public water supply

Other Significant Matters:

Additional Pending Enforcement Actions: Yes, Docket No. 2023-0943-PWS-E

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: The complainant has expressed an interest in the

matter but does not wish to attend Agenda. **Texas Register Publication Date:** August 9, 2024

Comments Received: No

**Penalty Information** 

**Total Penalty Assessed:** \$29,901

Amount Deferred for Expedited Settlement: \$5,980

Total Paid to General Revenue: \$23,921 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): August 29, 2023

**Complaint Information:** Alleged facility was not flushing all dead ends, not

completing customer service inspections, and allowing an unlicensed/unauthorized

individual to perform process control duties.

**Date(s) of Investigation:** September 12, 2023 through September 13, 2023

**Date(s) of NOE(s):** November 9, 2023

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#### **Violation Information**

- 1. Failed to provide a well capacity of 0.6 gallons per minute ("gpm") per connection. Specifically, Plant 21 had 118 connections requiring a well capacity of 71 gpm. However, only 48 gpm of well capacity were provided, indicating a 32% deficiency. Plant 15 had 158 connections requiring a well capacity of 95 gpm. However, only 83 gpm of well capacity were provided, indicating a 12% deficiency. Plant 2 had 99 connections requiring a well capacity of 59 gpm. However, only 44 gpm of well capacity were provided, indicating a 26% deficiency. Plant 10 had 121 connections requiring a well capacity of 73 gpm. However, only 52 gpm of well capacity were provided, indicating a 28% deficiency [30 Tex. Admin. Code § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c)].
- 2. Failed to provide a pressure tank capacity of 20 gallons per connection. Specifically, Plant 1B had 348 connections requiring a pressure tank capacity of 6,960 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency [30 Tex. ADMIN. CODE § 290.45(b)(1)(D)(iv) and Tex. Health & Safety Code § 341.0315(c)].
- 3. Failed to provide a total storage capacity of 200 gallons per connection. Specifically, Plant 2 had 99 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity were provided, indicating a 24% deficiency [30 Tex. Admin. Code § 290.45(b)(1)(C)(ii) and Tex. Health & Safety Code § 341.0315(c)].
- 4. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system facilities and equipment. Specifically, the device used to determine the air-water-volume in the pressure tanks at Plants 10, 1B, 8, 5 and 17 were dirty and hard to read [30 Tex. ADMIN. CODE § 290.46(m)].
- 5. Failed to provide all Facility wells with a concrete sealing block that extends a minimum of three feet from the well casing in all directions, with a minimum thickness of six inches and sloped to drain away at not less than 0.25 inches per foot. Specifically, the sealing block on Well No. 21 had a crack [30 Tex. ADMIN. CODE § 290.41(c)(3)(J)].
- 6. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, some of the paint on the well head was flaking and corroded on Well No. 22 [30 Tex. Admin. Code § 290.46(m)].
- 7. Failed to ensure that 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 gate on

## Executive Summary – Enforcement Matter – Case No. 65071 Pritchett Water Supply Corporation RN101224608 Docket No. 2023-1663-PWS-E

the fence surrounding Plant 1B was leaning out and had a large gap between the two gates [30 Tex. ADMIN. CODE § 290.43(e)].

- 8. Failed to inspect the interior of the Facility's pressure tank at least once every five years. Specifically, the pressure tanks at Plants 4, 5, 6, 8, 10, and 14 had not been inspected in the past five years [30 Tex. ADMIN. CODE § 290.46(m)(1)(B)].
- 9. Failed to use a water works operator who holds an applicable, valid license issued by the Executive Director. Specifically, an individual with a Class "D" Water Treatment License that had not been renewed had been performing process control duties since June 2, 2023 [30 Tex. Admin. Code § 290.46(e) and Tex. Health & Safety Code § 341.033(a)].
- 10. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, the paint on the pressure tank at Plant 5 was failing [30 Tex. ADMIN. CODE § 290.46(m)].
- 11. Failed to ensure that all clearwells, ground storage tanks ("GSTs"), standpipes, and elevated storage tanks are painted, disinfected, and maintained in strict accordance with current American Water Works Association ("AWWA") standards. Specifically, the coating on the roof hatch on the GST at Plant 8 was corroded, causing rust to run down the side of the GST [30 Tex. ADMIN. CODE § 290.43(c)(8)].
- 12. Failed to provide two or more service pumps having a total capacity of 2.0 gpm per connection. Specifically, Plant 17 had 223 connections requiring a service pump capacity of 446 gpm. However, only 300 gpm of service pump capacity were provided, indicating a 33% deficiency [30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(iii) and Tex. HEALTH & SAFETY CODE § 341.0315(c)].
- 13. Failed to provide a well capacity of 0.6 gpm per connection. Specifically, Plant 17 had 223 connections requiring a well capacity of 134 gpm. However, only 100 gpm of well capacity were provided, indicating a 25% deficiency [30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c)].
- 14. Failed to provide a well capacity of 0.6 gpm per connection. Specifically, Plant 5 had 70 connections requiring a well capacity of 42 gpm. However, only 40 gpm of well capacity were provided, indicating a 5% deficiency [30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c)].
- 15. Failed to flush all dead-end mains at monthly intervals. Specifically, the Respondent had not been flushing all dead-end mains monthly and had not been flushing dead-end mains created by valves to separate pressure planes [30 Tex. ADMIN. CODE § 290.46(l)].

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16. 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 a cross-connection or other potential contamination hazard exists. Specifically, the Respondent had not completed CSIs for all 158 new connections [30 Tex. Admin. Code § 290.46(j)].

#### Corrective Actions/Technical Requirements

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

The Respondent implemented the following corrective measures:

- a. By September 22, 2023, began using a water works operator who holds an applicable, valid license issued by the Executive Director;
- b. By September 26, 2023, repainted the corroded well head on Well No. 22; and
- c. By September 26, 2023, repaired the fence surrounding Plant 1B.

#### **Technical Requirements:**

The Order will require the Respondent to:

- a. Within 30 days:
- i. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including repairing or replacing the device used to determine air-water volume on the pressure tank at Plants 10, 1B, 8, 5, and 17;
- ii. Conduct an inspection of the interior of the Facility's pressure tanks at Plants 4, 5, 6, 8, 10, and 14;
- iii. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including repairing the paint on the pressure tank at Plant 5;
- iv. Begin flushing all dead-end mains at monthly intervals or more often as needed if water quality complaints are received from water customers or if disinfectant residuals fall below acceptable levels. This provision will be satisfied upon three months of consecutive compliant monthly flushing; and
- v. Conduct a CSI at all locations where cross-connections or potential contamination hazards may exist, including but not limited to the 158 new connections.
- b. Within 45 days, submit written certification to demonstrate compliance with a.

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- c. Within 60 days, repair or replace the exterior coating on the roof hatch on the GST at Plant 8 to meet current AWWA standards.
- d. Within 75 days, submit written certification to demonstrate compliance with c.
- e. Within 90 days:
- i. Repair the crack in the concrete sealing block at Well No. 21; and
- ii. Implement a CSI program to ensure all service connections are properly inspected.
- f. Within 105 days, submit written certification to demonstrate compliance with e.
- g. Within 135 days, submit written certification to demonstrate compliance with a.iv.
- h. Within 180 days:
- i. Provide a well capacity of at least 0.6 gpm per connection at Plant 21, 15, 2 and 10;
- ii. Provide a pressure tank capacity of at least 20 gallons per connection at Plant 1B;
- iii. Provide a total storage capacity of at least 200 gallons per connection at Plant 2;
- iv. Provide two or more service pumps having a total capacity of at least 2.0 gpm per connection at Plant 17;
- v. Provide a well capacity of at least 0.6 gpm per connection for Plant 17; and
- vi. Provide a well capacity of at least 0.6 gpm per connection at Plant 5.
- i. Within 195 days, submit written certification to demonstrate compliance with h.

#### **Contact Information**

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Savannah Jackson, Enforcement Division,

Enforcement Team 4, MC 219, (512) 239-4306; Michael Parrish, Enforcement Division,

MC 219, (512) 239-2548

**Respondent:** Josh Marrs, President, Pritchett Water Supply Corporation, 3670 State

Highway 155 South, Gilmer, Texas 75645-8063

Respondent's Attorney: N/A



### Penalty Calculation Worksheet (PCW)

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

**DATES** 

Assigned 13-Nov-2023 PCW 11-Dec-2023 Screening 29-Nov-2023 EPA Due

RESPONDENT/FACILITY INFORMATION	
11 211 011 211 1 1 1 1 1 1 1 1 1 1 1 1 1	
Respondent Pritchett Water Supply Corporation	
Reg. Ent. Ref. No. RN101224608	
Facility/Site Region 5-Tyler	Major/Minor Source Major

CASE INFORMATION	
Enf./Case ID No. 65071	No. of Violations 16
Docket No. 2023-1663-PWS-E	Order Type 1660
Media Program(s) Public Water Supply	Government/Non-Profit Yes
Multi-Media	Enf. Coordinator Christiana McCrimmon
	EC's Team Enforcement Team 4
Admin. Penalty \$ Limit Minimum \$50 Maximum	\$5,000

			'		1 - 7			
			Penalty (	Calcula	tion Section	n		
TOTA	L BASE PENA	LTY (Sum o	f violation bas				Subtotal 1	\$30,550
ADJU	STMENTS (+	/-) TO SUBT	OTAL 1					
	Subtotals 2-7 are of	otained by multiplyir	ng the Total Base Penalt		) by the indicated p			
	Compliance Hi	story		0.0%	Adjustment	Subto	tals 2, 3, & 7	\$0
	Notes		No adjustment fo	or compliar	nce history.			
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The R	espondent does no	t meet the	culpability crite	ria.		
	Good Faith Eff	ort to Comply	Total Adjustment	is			Subtotal 5	-\$649
							•	
	<b>Economic Bend</b>	efit		0.0%	Enhancement*		Subtotal 6	\$0
	Estimated	Total EB Amounts I Cost of Compliance		*Саррес	d at the Total EB \$ A	lmount		
SUM (	OF SUBTOTA	LS 1-7				F	inal Subtotal	\$29,901
OTHE	D EACTORS /	AC ILICTICE	MAY REQUIRE		0.0%		A dissatus ant	\$0
	or enhances the Final				0.0%		Adjustment	<b>\$</b> 0
	Notes							
						Final Per	nalty Amount	\$29,901
STAT	UTORY LIMIT	T ADJUSTME	NT			Final Asse	ssed Penalty	\$29,901
DEFE	RRAL				20.0%	Reduction	Adjustment	-\$5,980
Reduces	the Final Assessed Pe	nalty by the indicat	ed percentage.		•			
	Notes		Deferral offered fo	r expedited	d settlement.			
DAVA	BLE PENALT	v						\$23,921
IAIA	DLL FLINALI							423,321

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

**Screening Date** 29-Nov-2023

**Docket No.** 2023-1663-PWS-E

**Respondent** Pritchett Water Supply Corporation

**Case ID No.** 65071

Reg. Ent. Reference No. RN101224608

Media Public Water Supply

Enf. Coordinator Christiana McCrimmon

>>	Compliance Hist	Compliance History Worksheet cory 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 (number of NOVs meeting criteria)	0	0%
		Other written NOVs	0	0%
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0%
	Judgments	consent accrecs meeting criteria j		0%
	and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
	Emissions	Chronic excessive emissions events (number of events)	0	0%
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
		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%
	0 4.10.	Participation in a voluntary pollution reduction program	No	0%
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
		Adjustment Per	centage (Sub	total 2) 0%
>>	Repeat Violator	(Subtotal 3)		
	N/A	Adjustment Per	centage (Sub	ototal 3) 0%
>>	<b>Compliance Hist</b>	cory Person Classification (Subtotal 7)		
	N/A	Adjustment Per	centage (Sub	total 7) 0%
>>	<b>Compliance Hist</b>	cory Summary		
	Compliance History Notes	No adjustment for compliance history.		
>> F	inal Compliance	Total Compliance History Adjustment Percentage (S History Adjustment	Subtotals 2,	<b>3, &amp; 7)</b> 0%
	•	Final Adjustment Percenta	age *capped	at 100% 0%

	E	conomic	Benefit	Woi	ksheet		
• • • • • • • • • • • • • • • • • • •		r Supply Corporat	tion				
Case ID No. Reg. Ent. Reference No.							
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Dalassa d Carda							
Delayed Costs	<u> </u>	1 1		0.00	L #0	<b>#</b> 0	40
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/Construction	\$20,000	10-Sep-2020	10-May-2025	4.67	\$311	\$6,221	\$6,532
Land	Ψ20/000	10 OCP 2020	10 110 2025	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	connectio	n at Plant 21, 15,	2, and 10 (\$5,0	00 per	well x four wells), o	pacity of at least 0. calculated from the ted date of complian	date of the
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$20,000			TOTAL		\$6,532

Respondent Princhett Water Supply Corporation Red Ent. Reference No. RN101224608 Media Public Water Supply Ent. Coordinator Circidiana Nucrimmon Violation Number Rule Cite(s)  Falled to provide a pressure tank capacity of 20 gallens per connection. Specifically. Plant 18 had 348 connections requiring a pressure tank capacity of 5,800 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency.  **September 1, 2021 **September 1, 2021 **September 2, 2021 **Septem		Screening Date				<b>:ket No.</b> 2023-1663	-PWS-E	P	PCW
Reg. Ent. Reference No. RN301224683 Media Vulcilic Water Supply Enf. Coordinator Christiana McCrimmon Violation Number Rule Cite(s)  Failed to provide a pressure tank capacity of 20 gallons per connection. Specifically, Plant 18 had 348 connections requiring a pressure tank capacity of 6,960 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency.  **Separamental, Property and Human Health Matrix Harm Release Major Moderate Minor Percent 30,0%  >> Programmatic Matrix Failure to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  **Number of Violation Events**  Number of Violation Events**  Number of Violation Events**  Number of Violation Events**  **Number of Violation Events**  Number of Violation Events**  **Number of Violation Events**  **Number of Violation Events**  **Number of Violation Events**  Number of Violation Events**  Number of Violation Events**  **Number of Violation Ev				upply Corpor	ration		Policy F	Revision 5 (January	28, 2021)
Media   Public Water Supply   Seri. Coordinator   Control and McCrimmon   Violation Number   Rule Cite(s)   30 Tex. Admin. Code § 290.45(b)(1)(D)(b) and Tex. Health & Safety Code § 341.0315(c)   Violation Description   Failed to provide a pressure tank capacity of 20 gallons per connection. Specifically, Plant IB had 348 connections requiring a pressure tank capacity of 6,969 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency.  >> Environmental, Property and Human Health Matrix   Narm		Case ID No.	65071				PCV	V Revision February	/ 11, 2021
Second Faith Efforts to Comply   Second Faith Efforts	Reg.	Ent. Reference No.	RN101224608						
Second Faith Efforts to Comply   Second Faith Efforts		Media	Public Water Supr	plv					
Violation Number Rule Cite(s)  Rule Cite(s)  30 Tex, Admin. Code § 290,45(b)(1)(D)(iv) and Tex, Health & Safety Code § 341.0315(c)  Violation Description  Failed to provide a pressure tank capacity of 20 gallons per connection. Specifically, Plant 18 head 348 connections requiring a pressure tank capacity of 6,960 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency.  **Safe Penalty**  **Percent**  **Safe Penalty**  **Safe Penalty*									
South   Sout									
Violation Description  Failed to provide a pressure tank capacity of 20 gallons per connection. Specifically, Plant 18 had 348 connections requiring a pressure tank capacity of 6,960 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency.  Servironmental, Property and Human Health Matrix  Harm  Release Major Moderate Minor  Actual Potential Property and Human Health Matrix  Harm  Release Major Moderate Minor  Percent 30.0%  Selfication Major Moderate Minor  Percent 0.0%  Fallict to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  Notes  Number of Violation Events 3 78 Number of violation days  distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  Violation Events  Number of Violation Events 3 78 Number of violation days  distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  Violation Base Penalty \$4,500  \$1,500  Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total 54,500								1	
Violation Description  Failed to provide a pressure tank capacity of 20 gallons per connection. Specifically, Plant 18 had 348 connections requiring a pressure tank capacity of 6,960 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency.  Sase Penalty  S5.000  Servironmental, Property and Human Health Matrix Harm OR  Release Major Moderate Minor Potential X  Falliant to provide adequate pressure tank capacity or only a 10.0%  Servironmental X  Falliant to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health Notes  Number of Violation Events  Number of Violation Events  Number of Violation Events  Adjustment  \$1,500  Violation Events  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  O-0%  Extraordinary  Ordinary  Ordinary  Ordinary  The Respondent does not meet the good faith criteria for this violation.  Statutory Limit Test  Estimated EB Amount  \$6533  Violation Final Penalty Total  54,500		Rule elle(3)	30 Tex. Admi	n. Code § 29			& Safety Code §		
Violation Description					341.03	15(c)			
Violation Description									
Violation Description			Failed to provide	5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	ank conscitu	of 20 gallong nor conn	action Charifically		
However, only 3,000 gallons were provided, indicating a 57% deficiency.    Base Penalty		Violation Description							
Sase Penalty   \$5,000		Violation Description							
>> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Potential x Percent 30.0%  >> Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Percent 0.0%  Falsure to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the facility to contaminants which would exceed levels protective of human health.  Adjustment \$3,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly weekly weekly weekly was monthly and annual single event  Violation Base Penalty S4,500  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 0.0% November 29, 2023.  Good Faith Efforts to Comply November 29, 2023.  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500			nonever, o	, 3,000 ga	mons were pr	ovided, maleuting a 57	70 deficiency.		
>> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Potential x Percent 30.0%  >> Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Percent 0.0%  Falsure to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the facility to contaminants which would exceed levels protective of human health.  Adjustment \$3,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly weekly weekly weekly was monthly and annual single event  Violation Base Penalty S4,500  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 0.0% November 29, 2023.  Good Faith Efforts to Comply November 29, 2023.  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500									
>> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Potential x Percent 30.0%  >> Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Percent 0.0%  Falsure to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the facility to contaminants which would exceed levels protective of human health.  Adjustment \$3,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly weekly weekly weekly was monthly and annual single event  Violation Base Penalty S4,500  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 0.0% November 29, 2023.  Good Faith Efforts to Comply November 29, 2023.  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500							Paca Banaltu		¢E 000
Number of Violation Events   Saluretry   Seminanual annual single event   Saluretry   Seminanual annual single event   Saluretry   Seminanual annual single event   Saluretry   Seminanual single event   Saluretry   Seminanual annual annual single event   Saluretry							base Penalty		\$5,000
Number of Violation Events   Saluretry   Seminanual annual single event   Saluretry   Seminanual annual single event   Saluretry   Seminanual annual single event   Saluretry   Seminanual single event   Saluretry   Seminanual annual annual single event   Saluretry	>> Env	ironmental. Prope	rty and Huma	n Health	Matrix				
>>Programmatic Matrix Falsification Major Moderate Minor Falsification Major Major Moderate Minor Percent Tool Major		in ominionitally is rope.	cy and maine		· · · · · · · · · · · · · · · · · · ·				
>> Programmatic Matrix Falsification Major Moderate Minor Matrix Notes  Falsification Major Moderate Minor Falsification Major Major Major Falsification Major Major Major Major Major Falsification Major Majo		Release	Major	Moderate	Minor				
>> Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Matrix Notes  Falsification Major Moderate Minor Falsification Major Moderate Minor Falsification Major Moderate Minor Matrix Notes  Falsification Provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  Adjustment  \$3,500  \$1,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly monthly weekly monthly quarterly semiannual annual single event  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  Cordinary Ordinary Ordinary N/A Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$44,500  Economic Benefit (EB) for this violation  Statutory Limit Test Estimated EB Amount \$45,500	OR	Actual							
Falsification Major Moderate Minor Percent 0.0%  Matrix Notes  Fallure to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  Adjustment \$3,500  \$1,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly monthly x weekly monthly annual annual single event  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before 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 \$4,500  Economic Benefit (EB) for this violation \$50  Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500		Potential	X			Percent	30.0%		
Falsification Major Moderate Minor Percent 0.0%  Matrix Notes  Fallure to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  Adjustment \$3,500  \$1,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly monthly x weekly monthly annual annual single event  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 0.0% Reduction \$0  Before 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 \$4,500  Economic Benefit (EB) for this violation \$50  Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500									
Percent   0.0%	>>Prog	grammatic Matrix							
Failure to provide adequate pressure tank capacity could result in low pressure throughout the distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.  Adjustment \$3,500  S1,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly monthly quarterly semiannual annual single event  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 0.0% Extraordinary Ordinary NA X Notes The Respondent does not meet the good faith criteria for this violation.  Feature of this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500		Falsification	Major	Moderate	Minor	_			
Matrix   Notes   distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.    Adjustment   \$3,500						Percent	0.0%		
Matrix   Notes   distribution system exposing persons served by the Facility to contaminants which would exceed levels protective of human health.    Adjustment   \$3,500								a	
Notes   Stribution system exposing persons served by the racility to contaminants which would exceed levels protective of human health.									
Adjustment \$3,500  \$1,500  Violation Events  Number of Violation Events 3 78 Number of violation days  daily weekly Number of Violation Base Penalty 94,500  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 8 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 \$4,500  Economic Benefit (EB) for this violation \$50  Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500		distribution s	system exposing p				hich would exceed		
Violation Events  Number of Violation Events  Number of Violation Events  Adaily weekly weekl		110103		levels prote	ctive of huma	n health.			
Violation Events  Number of Violation Events  Number of Violation Events  Adaily weekly weekl									
Violation Events    Number of Violation Events   3						Adjustment	\$3,500	İ	
Violation Events    Number of Violation Events   3									¢1 500
Number of Violation Events 3 78 Number of violation days    daily									\$1,500
Number of Violation Events 3 78 Number of violation days    daily	Violatio	on Events							
daily   weekly   monthly   x   weekly   semiannual   single event   monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.    Good Faith Efforts to Comply   0.0%   Reduction   \$0	Tioladia							1	
weekly monthly a x quarterly semiannual annual single event		Number of \	/iolation Events	3		78 Number of	violation days		
weekly monthly a x quarterly semiannual annual single event									
monthly quarterly Semiannual Single event Semiannual Se			daily						
quarterly semiannual annual annual single event  Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  0.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$4,500  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$4,500			weekly						
Semiannual annual single event   Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  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 \$4,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500			monthly	Х					
Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  0.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary  Ordinary  N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$4,500  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$4,500			quarterly			Viola	tion Base Penalty		\$4,500
Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  O.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary  Ordinary  N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$4,500  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$44,500			semiannual						
Three monthly events are recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply    0.0%   Reduction   \$0   Before NOE/NOV   NOE/NOV to EDPRP/Settlement Offer			annual						
Good Faith Efforts to Comply  O.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$4,500  Economic Benefit (EB) for this violation  \$44,500			single event						
Good Faith Efforts to Comply  O.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$4,500  Economic Benefit (EB) for this violation  \$44,500		I <del>-</del>						a	
Good Faith Efforts to Comply  O.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$4,500  Economic Benefit (EB) for this violation  \$44,500		Three monthly	v events are recon	nmended, ca	lculated from	the date of the invest	igation. September		
Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation  \$4,500  Statutory Limit Test  Estimated EB Amount \$4,500									
Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation  \$4,500  Statutory Limit Test  Estimated EB Amount \$653  Violation Final Penalty Total \$4,500								1	
Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation  \$4,500  Statutory Limit Test  Estimated EB Amount \$4,500	Good F	aith Efforts to Com	nly	0.0%			Doduction		¢Ω
Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$4,500  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$653  Violation Final Penalty Total  \$4,500	JUUU F	aidi Ellorts to colli			NOE/NOV to FDI	PRP/Settlement Offer	Reduction		Ψυ
Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$653  Violation Final Penalty Total \$4,500									
Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500			·						
Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$4,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500			·   <u>-</u>	v					
Violation Subtotal \$4,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500			IV/A	^					
Violation Subtotal \$4,500  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$653 Violation Final Penalty Total \$4,500			Notes	he Responde			<mark>teria for</mark>		
Economic Benefit (EB) for this violation  Statutory Limit Test  Violation Final Penalty Total \$4,500			Notes		this v	iolation.			
Economic Benefit (EB) for this violation  Statutory Limit Test  Violation Final Penalty Total \$4,500			<u> </u>						
Estimated EB Amount \$653 Violation Final Penalty Total \$4,500						•	Violation Subtotal		\$4,500
Estimated EB Amount \$653 Violation Final Penalty Total \$4,500	Fee:	nic Denefit (FD) f	المامادان عاملا			Chalasta	ar Limit Tast		
	Econon	inc benefit (EB) for	tilis violation				•		
This violation Final Assessed Penalty (adjusted for limits) \$4,500		Estimate	ed EB Amount		\$653	Violation F	inal Penalty Total		\$4,500
				This viol	ation Final A	ssessed Penalty (ac	ljusted for limits)		\$4,500

	E	conomic	Benefit	Woı	rksheet		
Respondent Case ID No.		er Supply Corporat	ion				
Reg. Ent. Reference No.	RN101224608						
Media Violation No.	Public Water S 2	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$2,000	10-Sep-2020	10-May-2025	4.67	\$31	\$622	\$653
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)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	per connection	on at Plant 1B, cal	culated from the to the estim	date o	f the investigation ate of compliance.	ank capacity of at le initially documentin	g the violation
Avoided Costs	ANNU	ALIZE avoided c	osts before en		<u> </u>	one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs					, <del>4</del> 0	<del>-</del>	¥ű
Approx. Cost of Compliance		\$2,000			TOTAL		\$653

Number of Violation Events 1 78 Number of violation days    daily	Screening Date	29-Nov-2023	<b>Docket No.</b> 2023-1663-PWS-E	PCW
Reg. Ent. Reference No. RNIO12240808 Media Public Weter Supply Enf. Coordinator Violation Number Rule Cite(s)  3	Respondent	Pritchett Water Supply Corpo	pration Policy Re	evision 5 (January 28, 2021)
Seri   Coordinator   Contristana McCrimmon   3   3   3   3   3   3   3   3   3			PCW	Revision February 11, 2021
Second Patt	Reg. Ent. Reference No.	RN101224608		
Violation Number Rule Cite(s)  30 Tex. Admin. Code § 290.45(b)(1)(C)(ii) and Tex. Health & Safety Code § 341.0315(c)  Violation Description  Palled to provide a total storage capacity of 200 gallons per connection. Specifically, and 25 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity were provided, indicating a 24% deficiency.  Sase Penalty  Posterial  Release  Major  Moderate  Minor  Actual  Potential  Percent  15,0%  Percent	Media	Public Water Supply		
Violation Description   Failed to provide a total storage capacity of 19,800 gallons per connection. Specifically, Plant 2 had 99 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity vere provided, indicating a 24% deficiency.    Sase Penalty	Enf. Coordinator	Christiana McCrimmon		
Violation Description  Failed to provide a total storage capacity of 200 gallons per connection. Specifically, Plant 2 had 99 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity were provided, indicating a 24% deficiency.  **Separation**  **Percent**  **Percent**  **Indication**  **Percent**  **Indication*	Violation Number	3		
Violation Description Violation Subtotal Violation Subtotal Violation Final Penalty Total Seconomic Benefit (EB) for this Violation Estimated EB Amount Violation Final Penalty Total Seconomic Description Viol	Rule Cite(s)	30 Tex. Admin. Code 8 2	290.45(h)(1)(C)(ii) and Tex. Health & Safety Code 8	
Violation Description   Failed to provide a total storage capacity of 200 gallons per connection. Specifically, Plant 2 had 99 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity were provided, indicating a 24% deficiency.    Sase Penalty		56 76/17/411111111 5646 3 2		
Violation Description Plant 2 had 99 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity were provided, indicating a 24% deficiency.    Base Penalty   \$5,000			· · ·	
Violation Description Plant 2 had 99 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity were provided, indicating a 24% deficiency.    Base Penalty   \$5,000				
See		Failed to provide a total stor	age capacity of 200 gallons per connection. Specifically,	
Servironmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Potential X Percent 15.0%  >> Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Significant amount of contaminants which would not exceed levels protective of human health.  ### Adjustment 44,250  ### Adjustment 44,250  ### Adjustment 44,250  ### Adjustment 44,250  ### Adjustment 54,250  ### Adjustment 54,	Violation Description			
>> Environmental, Property and Human Health Matrix   Release   Major   Moderate   Minor		only 15,000 gallons of stora	ge capacity were provided, indicating a 24% deficiency.	
>> Environmental, Property and Human Health Matrix   Release   Major   Moderate   Minor				
>> Environmental, Property and Human Health Matrix   Release   Major   Moderate   Minor				
>> Environmental, Property and Human Health Matrix Release Major Moderate Minor Actual Potential X Percent 15.0%  >> Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Falsification Major Moderate Minor Notes Significant amount of contaminants which would not exceed levels protective of human health.  Adjustment \$4,250  \$750  Violation Events  Number of Violation Events 1 78 Number of violation days  daily weekly monthly quarterly x semiannual single event			Base Penalty	\$5,000
Release Major Moderate Minor Actual Potential X Percent 15.0%  >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Falsure to provide adequate storage capacity would expose persons served by the Facility 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 78 Number of violation days  daily weekly Monothly 4 Quarterly X Semiannual Annual Single event 1				
Release Major Moderate Minor Potential X Percent 15.0%  >>Programmatic Matrix Fallure to provide adequate storage capacity would expose persons served by the Facility to a significant amount of contaminants which would not exceed levels protective of human health.  Adjustment \$4,250  Violation Events  Number of Violation Events 1 78 Number of violation days  daily weekly monthly quarterly x semiannual single event  One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply 0.0%  Defore NOE/NOV NOE/NOV to EDPRE/Settlement Offer Extraordinary Ordinary 1 NOE/NOV to EDPRE/Settlement Offer Extraordinary 1 NOE/NOV to EDPR	>> Environmental, Prope		Matrix	
Potential X Percent 15.0%  >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Adjustment \$4,250  S750  Violation Events  Number of Violation Events 1 78 Number of violation days  daily Weekly Monthly Quarterly was semiannual annual single event 100 Moderate Minor Moderate Minor Moderate Major Moderate Minor Moderate Moderate Minor Moderate Mi				
>>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Falsification Major Moderate Minor Falsification Major Moderate Minor  Percent 0.0%  Matrix Notes Falsification Events \$4,250   **Tool Matrix **Supplies Adjustment \$4,250  **Tool Matrix **Matrix **Supplies Adjustment \$4,250  **Tool Matrix **Supplies Adjustment \$4,250  **Tool Matri			Minor	
>>Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0%  Matrix Notes Fallure to provide adequate storage capacity would expose persons served by the Facility to a significant amount of contaminants which would not exceed levels protective of human health.  **Adjustment** **Superior of Violation Events**  Number of Violation Events**  Number of Violation Events**  Number of Violation Events**  Violation Base Penalty  **T50  **T50  One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  **Before NDE/RICV** **NOVEMON** NOVEMON** To EDPREY/Settlement Offer  Extraordinary Ordinary N/A Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  **T50  Economic Benefit (EB) for this violation  **Statutory Limit Test**  Violation Final Penalty Total  **750				
Falsification Major Moderate Minor Percent 0.0%  Matrix Notes  Fallure to provide adequate storage capacity would expose persons served by the Facility 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 78 Number of violation days  daily weekly monthly quarteriy x semiannual annual single event	Potentia	x	Percent 15.0%	
Falsification Major Moderate Minor Percent 0.0%  Matrix Notes  Fallure to provide adequate storage capacity would expose persons served by the Facility 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 78 Number of violation days  daily weekly monthly quarteriy x semiannual annual single event				
Percent		Majau Madauata	Minon	
Matrix Notes  Failure to provide adequate storage capacity would expose persons served by the Facility 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  Number of Violation Events  Number of Violation Events  Violation Base Penalty  semiannual annual single event  One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  Service Note Note Note Note Note Note Note Not	Faisification	Major Moderate		
Notes   significant amount of contaminants which would not exceed levels protective of human health.			Percent 0.0%	
Notes   significant amount of contaminants which would not exceed levels protective of human health.				
Notes   significant amount of contaminants which would not exceed levels protective of human health.	Matrix Failure to	provide adequate storage capa	acity would expose persons served by the Facility to a	
Violation Events  Number of Violation Events				
Violation Events  Number of Violation Events			·	
Violation Events  Number of Violation Events			A J	
Number of Violation Events    Number of Violation Events   1			Adjustment \$4,250	
Number of Violation Events    Number of Violation Events   1			Γ	\$750
Number of Violation Events 1 78 Number of violation days    daily			L	4,50
daily   weekly   monthly   quarterly   x   weekly   x   weekly   weekly   x   weekly   weekly   semiannual   annual   single event   weekly   wee	Violation Events			
daily   weekly   monthly   quarterly   x   weekly   x   weekly   weekly   x   weekly   weekly   semiannual   annual   single event   weekly   wee				
weekly monthly quarterly x semiannual annual single event  One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  O.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 \$750  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$3,371  Violation Final Penalty Total \$750	Number of	Violation Events 1	78 Number of violation days	
weekly monthly quarterly x semiannual annual single event  One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  O.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 \$750  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$3,371  Violation Final Penalty Total \$750				
monthly quarterly x semiannual single event  One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  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  \$750  Economic Benefit (EB) for this violation  Statutory Limit Test Estimated EB Amount  \$3,371  Violation Final Penalty Total		daily		
quarterly semiannual annual single event  One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$750		-		
Good Faith Efforts to Comply  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  \$\$\frac{\text{\$83,371}}{\text{\$83,371}}\$\$ Violation Final Penalty Total			_	
One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  O.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  Statutory Limit Test Estimated EB Amount  \$3,371  Violation Final Penalty Total		' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	Violation Base Penalty	\$750
One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  O.0%  Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$3,371  Violation Final Penalty Total  \$750				
One quarterly event is recommended, calculated from the date of the investigation, September 12, 2023, to the date of the screening, November 29, 2023.  Good Faith Efforts to Comply  Defore NOE/NOV NOE/NOV to EDPRP/Settlement Offer  Extraordinary  Ordinary  N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$3,371  Violation Final Penalty Total		annual		
Good Faith Efforts to Comply  O.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  \$750  Economic Benefit (EB) for this violation  \$3,371 Violation Final Penalty Total \$750		single event		
Good Faith Efforts to Comply  O.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  \$750  Economic Benefit (EB) for this violation  \$3,371  Violation Final Penalty Total  \$750	<u></u>			
Good Faith Efforts to Comply  O.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  \$750  Economic Benefit (EB) for this violation  \$3,371  Violation Final Penalty Total  \$750	One quarterly	v event is recommended, calcu	lated from the date of the investigation, September 12,	
Extraordinary Ordinary Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  \$3,371 Violation Final Penalty Total  \$750				
Extraordinary Ordinary Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$750				
Extraordinary Ordinary Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  \$3,371 Violation Final Penalty Total  \$750	Good Faith Efforts to Con	anly 0.0%	Poduction	40
Extraordinary Ordinary N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal  \$750  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount  \$3,371  Violation Final Penalty Total  \$750	COOG FUILLI ETIONES TO COM			φ0
Ordinary  N/A  Notes  The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$750  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$3,371  Violation Final Penalty Total \$750			, , , , , , , , , , , , , , , , , , , ,	
Notes The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$750  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$3,371 Violation Final Penalty Total \$750		· ·		
The Respondent does not meet the good faith criteria for this violation.  Violation Subtotal \$750  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$3,371 Violation Final Penalty Total \$750				
This violation.  Violation Subtotal \$750  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$3,371 Violation Final Penalty Total \$750		IV/A  X		
Violation Subtotal \$750  Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$3,371 Violation Final Penalty Total \$750			tent does not most the good faith critoria for	
Economic Benefit (EB) for this violation  Statutory Limit Test  Statutory Limit Test  Violation Final Penalty Total \$750		The Respond	dent does not meet the good faith chteria for	
Economic Benefit (EB) for this violation  Statutory Limit Test  Statutory Limit Test  Violation Final Penalty Total \$750		Notes The Respond		
Economic Benefit (EB) for this violation  Statutory Limit Test  Statutory Limit Test  Violation Final Penalty Total \$750		Notes The Respond		
Estimated EB Amount \$3,371 Violation Final Penalty Total \$750		Notes The Respond	this violation.	¢750
Estimated EB Amount \$3,371 Violation Final Penalty Total \$750		Notes The Respond	this violation.	\$750
	Economic Benefit (EB) fo	Notes	this violation.  Violation Subtotal	\$750
		r this violation	this violation.  Violation Subtotal  Statutory Limit Test	
This violation Final Assessed Bonalty (adjusted for limits)		r this violation	this violation.  Violation Subtotal  Statutory Limit Test	
This violation Final Assessed Penalty (adjusted for limits) \$750		r this violation	Violation Subtotal  Statutory Limit Test  \$3,371  Violation Final Penalty Total	\$750

	E	conomic	Benefit	Woı	rksheet		
Respondent	Pritchett Wate	er Supply Corporat	ion				
Case ID No.	65071						
Reg. Ent. Reference No.	RN101224608	3					
	Public Water 9	Supply				Percent Interest	Years of
Violation No.	3					r croome zincerese	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	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)	\$10,320	10.0 2020	10 May 2025	0.00	\$0	\$0	\$0
Engineering/Construction Land	\$10,320	10-Sep-2020	10-May-2025	4.67 0.00	\$161 \$0	\$3,210 n/a	\$3,371 \$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	per connec	tion (\$2.15 x 4,80 documen	0 gallons) at Plating the violation	nt 2, can to the	alculated from the estimated date of	·	ation initially
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 Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$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		\$10,320			TOTAL		\$3,371

	Screening Date	29-Nov-2023		Docke	et No. 2023-1663-PWS-E		PCW
	Respondent	Pritchett Water	Supply Corpo	ration		Policy Rev	vision 5 (January 28, 2021)
	Case ID No.	65071				PCW F	Revision February 11, 2021
Reg.	<b>Ent. Reference No.</b>	RN101224608					
		Public Water Su	vlaau				
	<b>Enf. Coordinator</b>						
	Violation Number		1				
	Rule Cite(s)						
	iture energy		30 7	Tex. Admin. Code	e § 290.46(m)		
		Failed to ini	tiate maintena	ance and housek	eeping practices to ensure the g	lood	
					f the system facilities and equip		
	Violation Description				he air-water-volume in the pres		
					were dirty and hard to read.		
					· ·		
	l						
					Base F	Penalty	\$5,000
>> En	vironmental, Prope	rty and Hum		Matrix			
	Release	Major	<b>Harm</b> Moderate	Minor			
OR	Actual		Hoderate	1-111101			
OK					Borcont 7.00/		
	Potential			X	Percent 7.0%		
> > D							
>>PF0	grammatic Matrix Falsification	Major	Moderate	Minor			
	FaisiilCation	Major	Moderate	Minor	Borcont 0.00/		
					Percent 0.0%		
					appearance of the Facility could		
	Notes customers of	the Facility to ar	n insignificant	amount of conta	minants which would not exceed	d levels	
	Notes		protectiv	ve of human hea	ith.		
					Adjustment	\$4,650	
							\$350
Violati	on Events						
	Number of \	lialation Events	5	1	Number of violation de		
	Number of V	/iolation Events	5		78 Number of violation da	ys	
	Í	dailu		1			
		daily					
		weekly					
		weekly monthly			Violeties Bees F		41.750
		weekly monthly quarterly			Violation Base F	Penalty	\$1,750
		weekly monthly quarterly semiannual			Violation Base F	Penalty	\$1,750
		weekly monthly quarterly semiannual annual			Violation Base F	Penalty	\$1,750
		weekly monthly quarterly semiannual	X		Violation Base F	Penalty	\$1,750
		weekly monthly quarterly semiannual annual	X		Violation Base F	enalty	\$1,750
		weekly monthly quarterly semiannual annual single event	x	acommonded (on		Penalty	\$1,750
		weekly monthly quarterly semiannual annual single event	x events are re	ecommended (on	Violation Base F	Penalty	\$1,750
		weekly monthly quarterly semiannual annual single event	x events are re	ecommended (on		Penalty	\$1,750
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event		ecommended (on	e for each device).		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single	x e events are re  0.0% Sefore NOE/NOV	ecommended (on	e for each device). Re	Penalty  duction	\$1,750 \$0
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single	0.0%	`	e for each device). Re		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single	0.0%	`	e for each device). Re		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single ply  Extraordinary Ordinary	0.0% Sefore NOE/NOV	`	e for each device). Re		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single	0.0%	`	e for each device). Re		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single  Extraordinary Ordinary N/A	0.0% Before NOE/NOV	NOE/NOV to EDPRP	e for each device). Re		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single ply  Extraordinary Ordinary	0.0% Before NOE/NOV	NOE/NOV to EDPRP	Re for each device).  Re //Settlement Offer et the good faith criteria for		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single  Extraordinary Ordinary N/A	0.0% Before NOE/NOV	NOE/NOV to EDPRP	Re for each device).  Re //Settlement Offer et the good faith criteria for		. ,
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single  Extraordinary Ordinary N/A	0.0% Before NOE/NOV	NOE/NOV to EDPRP	Re /Settlement Offer et the good faith criteria for ation.	duction	\$0
Good F	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single  Extraordinary Ordinary N/A	0.0% Before NOE/NOV	NOE/NOV to EDPRP	Re for each device).  Re //Settlement Offer et the good faith criteria for	duction	
	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event  Five single Extraordinary Ordinary N/A Notes	0.0% Before NOE/NOV  x  The Respond	NOE/NOV to EDPRP	Re /Settlement Offer et the good faith criteria for ation.	duction	\$0
	mic Benefit (EB) for	weekly monthly quarterly semiannual annual single event  Five single  Extraordinary Ordinary N/A Notes	0.0% Before NOE/NOV  x  The Respond	NOE/NOV to EDPRP	re for each device).  Re /Settlement Offer et the good faith criteria for ation.  Violation So	duction ubtotal	\$1,750
	mic Benefit (EB) for	weekly monthly quarterly semiannual annual single event  Five single Extraordinary Ordinary N/A Notes	0.0% Before NOE/NOV  x  The Respond	NOE/NOV to EDPRP	Re for each device).  Re //Settlement Offer  et the good faith criteria for ation.  Violation Se	duction ubtotal	\$0
	mic Benefit (EB) for	weekly monthly quarterly semiannual annual single event  Five single  Extraordinary Ordinary N/A Notes	0.0% Before NOE/NOV  X  The Respond	NOE/NOV to EDPRP	re for each device).  Re /Settlement Offer et the good faith criteria for ation.  Violation So	duction ubtotal est	\$0 \$1,750

	E	conomic	Benefit	Woi	rksheet		
Respondent	Pritchett Wate	er Supply Corporat	ion				
Case ID No.	65071						
Reg. Ent. Reference No.	RN101224608	3					
Media	Public Water 9	Supply				Percent Interest	Years of
Violation No.	4					reicent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	<b>EB Amount</b>
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 \$0	n/a	\$0
Record Keeping System Training/Sampling				0.00	\$0	n/a n/a	\$0 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	12-Sep-2023	11-Dec-2024	1.25	\$31	n/a	\$31
Notes for DELAYED costs	water-vo	olume in the press inv	ure tanks at Pla restigation to the	nts 10, e estima	1B, 8, 5 and 17, ca ated date of compl		late of the
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				, 0.00	1 40	Ψ0	
Approx. Cost of Compliance		\$500			TOTAL		\$31

	Screenin					<b>et No.</b> 2023-1663-PW	JL	PCW
	Resp	ondent	Pritchett Water	r Supply Corpo	ration		Policy R	evision 5 (January 28, 2021)
	Case	ID No.	65071				PCW	/ Revision February 11, 2021
Reg. E	Ent. Referer	nce No.	RN101224608					
		Media	Public Water S	upply				
	Enf. Coord		Christiana McC					
	Violation		5	1				
	Rule	e Cite(s)						
		` ,		30 Tex	k. Admin. Code	§ 290.41(c)(3)(J)		
			Failed to pr	rovide all Facili	tv wells with a	oncrete sealing block that	at extends a	
	Violation Des	a a vimbia m	minimum (	of three feet fr	om the well cas	ing in all directions, with	a minimum	
	violation Des	scription	thickness of	six inches and	sloped to drain	away at not less than 0.	25 inches per	
			foot	. Specifically,	the sealing bloc	c on Well No. 21 had a c	rack.	
							_	
							Base Penalty	\$5,000
>> Env	rironmental	Droper	rty and Hun	nan Haalth	Matrix			
// CIIV	ii oiiiileiitai,	, Proper	ty and nun	Harm	Matrix			
		Release	Major	Moderate	Minor			
OR		Actual						
		Potential		Х		Percent 15	5.0%	
		<u>.</u>					<u>'</u>	
>>Prog	grammatic N	Matrix						
	Fals	sification	Major	Moderate	Minor		<u></u>	
						Percent (	0.0%	
	Failu	ire to prov	vide the well wit	h a sealing blo	ock that is not c	acked could result in pe	rsons served by	
	Matrix the					minants which would not		
	Notes	,	,		ve of human he			
						Adjustment	\$4,250	•
						7 lujustinent	7 ./===	
								\$750
Violatio	n Events							
Violatio		umbor of W	/iolation Events	1	1	Number of viol	ation days	
Violatio		umber of V	/iolation Events	1		78 Number of viol	ation days	
Violatio		umber of V		1		78 Number of viol	ation days	
Violatio		umber of V	daily	1		78 Number of viol	ation days	
Violatio		umber of V	daily weekly	1		78 Number of viol	ation days	
Violatio		umber of V	daily				ation days	\$750
Violatio		umber of V	daily weekly monthly	1 x				\$750
Violatio		umber of V	daily weekly monthly quarterly					\$750
Violatio		umber of V	daily weekly monthly quarterly semiannual					\$750
Violatio		umber of V	daily weekly monthly quarterly semiannual annual					\$750
Violatio	Nu		daily weekly monthly quarterly semiannual annual single event	X	lated from the	Violation	n Base Penalty	\$750
Violatio	Nu		daily weekly monthly quarterly semiannual annual single event	x mended, calcu			n Base Penalty	\$750
Violatio	Nu		daily weekly monthly quarterly semiannual annual single event	x mended, calcu		Violation  Interpretation of the investigation,	n Base Penalty	\$750
	One	quarterly	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to	x mended, calcu		Violation  Interpretation of the investigation,	September 12,	
	Nu	quarterly	daily weekly monthly quarterly semiannual annual single event event is recom 2023, to	x mended, calcu	ne screening, No	Violation Violation of the investigation, ovember 29, 2023.	n Base Penalty	\$750 \$0
	One	quarterly	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to	x mended, calcu the date of th	ne screening, No	Violation  Interpretation of the investigation,	September 12,	
	One	quarterly	daily weekly monthly quarterly semiannual annual single event event is recom 2023, to	x mended, calcu the date of th	ne screening, No	Violation Violation of the investigation, ovember 29, 2023.	September 12,	
	One	quarterly	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary	mended, calcu	ne screening, No	Violation Violation of the investigation, ovember 29, 2023.	September 12,	
	One	quarterly	daily weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calcu	ne screening, No	Violation Violation of the investigation, ovember 29, 2023.	September 12,	
	One	quarterly	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A	mended, calcu	NOE/NOV to EDPR	Violation Violation of the investigation, ovember 29, 2023.	September 12,	
	One	quarterly	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary	mended, calcu	NOE/NOV to EDPR	Violation date of the investigation, evember 29, 2023.  P/Settlement Offer determined the good faith criteria	September 12,	
	One	quarterly	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A	mended, calcu	NOE/NOV to EDPR	Violation date of the investigation, evember 29, 2023.  P/Settlement Offer determined the good faith criteria	September 12,	
	One	quarterly	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A	mended, calcu	NOE/NOV to EDPR	Violation  date of the investigation, ovember 29, 2023.  P/Settlement Offer  eet the good faith criteria plation.	September 12,	
Good Fa	One aith Efforts	quarterly to Com	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A Notes	mended, calculo the date of th	NOE/NOV to EDPR	Violation Violation Violation, ovember 29, 2023.  P/Settlement Offer Violation.	September 12, Reduction	\$0
Good Fa	One	quarterly to Com	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A Notes	mended, calculo the date of th	NOE/NOV to EDPR	Violation  date of the investigation, ovember 29, 2023.  P/Settlement Offer  eet the good faith criteria plation.	September 12, Reduction	\$0
Good Fa	One aith Efforts	quarterly to Com	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A Notes	mended, calculo the date of th	NOE/NOV to EDPR	Violation  Jate of the investigation, ovember 29, 2023.  P/Settlement Offer  Leet the good faith criteria plation.  Viol  Statutory L	September 12,  Reduction  a for  ation Subtotal	\$0 \$750
Good Fa	One aith Efforts	quarterly to Com	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A Notes	mended, calculo the date of th	NOE/NOV to EDPR	Violation Violation Violation, ovember 29, 2023.  P/Settlement Offer Violation.	September 12,  Reduction  a for  ation Subtotal	\$0
Good Fa	One aith Efforts	quarterly to Com	daily weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A Notes	mended, calculo the date of the date of the Moe/Nov  X  The Respond	NOE/NOV to EDPF ent does not m this vio	Violation  Jate of the investigation, ovember 29, 2023.  P/Settlement Offer  Leet the good faith criteria plation.  Viol  Statutory L	September 12,  Reduction  a for  ation Subtotal  imit Test  Penalty Total	\$0 \$750

	E	conomic	Benefit	10W	'ksheet		
Respondent	Pritchett Wate	r Supply Corporat	ion				
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S	Supply				<b>Percent Interest</b>	Years of
Violation No.	5						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	\$250	12-Sep-2023	9-Feb-2025	1.41	\$1	\$24	\$25
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	·	alculated from the	e date of the inv	estigati	on to the estimate	the sealing block at d date of compliand	e.
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$250			TOTAL		\$25

	Screening Date	29-NOV-2023			<b>et No.</b> 2023-1663-PWS-E		PCW
	Respondent	Pritchett Water	Supply Corpo	ration		Policy R	evision 5 (January 28, 2021)
	Case ID No.	65071				PCW	Revision February 11, 2021
Reg.	<b>Ent. Reference No.</b>	RN101224608					
		Public Water Si					
	Enf. Coordinator	Christiana McC	rimmon				
	Violation Number	6					
	Rule Cite(s)		30 -	Гех. Admin. Cod	e 8 290 46(m)		
					3 2301 10()		
	Violation Description	working condit	tion and gener	al appearance of	eeping practices to ensure the f the system's facilities and eq ead was flaking and corroded	uipment.	
		. , , ,		No. 22			
					Base	Penalty	\$5,000
>> En	vironmental, Prope	rty and Hum		Matrix			
	D.J	Madan	Harm	Mina			
OR	<b>Release</b> Actual	Major	Moderate	Minor			
OK	Potential			X	Percent 7.0%		
	1 occirciai			^	7.070		
>>Pro	grammatic Matrix						
	Falsification	Major	Moderate	Minor			
					Percent 0.0%		
				·			
					appearance of the Facility coul		
	Notes persons serv	ed by the Facili			contaminants which would not	exceed	
	110003		levels prote	ective of human	health.		
						± 4.650	
					Adjustment	\$4,650	
						Г	\$350
Violati	on Events						
					a contra		
	Number of \	iolation Events	1		Number of violation of	lays	
	Number of \		1	1	Number of violation o	lays	
	Number of \	daily	1		Number of violation o	lays	
	Number of \	daily weekly	1		Number of violation o	lays	
	Number of \	daily weekly monthly	1		Number of violation of Violation Base		\$350
	Number of \	daily weekly	1				\$350
	Number of \	daily weekly monthly quarterly					\$350
	Number of \	daily weekly monthly quarterly semiannual	1				\$350
	Number of \	daily weekly monthly quarterly semiannual annual					\$350
	Number of \	daily weekly monthly quarterly semiannual annual	X		Violation Base		\$350
	Number of \	daily weekly monthly quarterly semiannual annual	X	event is recomm	Violation Base		\$350
	Number of \	daily weekly monthly quarterly semiannual annual	X	event is recomm	Violation Base		\$350
Good F		daily weekly monthly quarterly semiannual annual single event	X	event is recomm	Violation Base		\$350 \$87
Good F	Number of \	daily weekly monthly quarterly semiannual annual single event	x One single	event is recomm	Violation Base ended.	Penalty	·
Good F		daily weekly monthly quarterly semiannual annual single event	X One single		Violation Base ended.	Penalty	·
Good F		daily weekly monthly quarterly semiannual annual single event	X One single		Violation Base ended.	Penalty	·
Good F		daily weekly monthly quarterly semiannual annual single event	X One single  25.0%  Sefore NOE/NOV		Violation Base ended.	Penalty	·
Good F		daily weekly monthly quarterly semiannual annual single event	X One single  25.0% sefore NOE/NOV	NOE/NOV to EDPRI	Violation Base  ended.  P/Settlement Offer	Penalty	·
Good F		daily weekly monthly quarterly semiannual annual single event	X One single  25.0% sefore NOE/NOV	NOE/NOV to EDPRI	ended.  P/Settlement Offer  mpliance on September 26,	Penalty	·
Good F		daily weekly monthly quarterly semiannual annual single event	X One single  25.0% sefore NOE/NOV	NOE/NOV to EDPRI	ended.  P/Settlement Offer  mpliance on September 26,	Penalty	·
Good F		daily weekly monthly quarterly semiannual annual single event	X One single  25.0% sefore NOE/NOV	NOE/NOV to EDPRI	ended.  P/Settlement Offer  mpliance on September 26, 3.	Penalty Reduction	\$87
Good F		daily weekly monthly quarterly semiannual annual single event	X One single  25.0% sefore NOE/NOV	NOE/NOV to EDPRI	ended.  P/Settlement Offer  mpliance on September 26,	Penalty Reduction	·
		daily weekly monthly quarterly semiannual annual single event  ply  Extraordinary Ordinary N/A Notes	X One single  25.0%  Sefore NOE/NOV  X  The Respond	NOE/NOV to EDPRI	ended.  P/Settlement Offer  mpliance on September 26, 3.	Reduction Subtotal	\$87
	Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes	x One single  25.0% Sefore NOE/NOV  X The Respond	NOE/NOV to EDPRI	ended.  P/Settlement Offer  mpliance on September 26, 3.  Violation  Statutory Limit	Reduction  Subtotal  Test	\$87
	Faith Efforts to Com	daily weekly monthly quarterly semiannual annual single event  ply  Extraordinary Ordinary N/A Notes	x One single  25.0% Sefore NOE/NOV  X The Respond	NOE/NOV to EDPRI	ended.  P/Settlement Offer  mpliance on September 26, 3.  Violation	Reduction  Subtotal  Test	\$87

	E	conomic	Benefit	Woi	rksheet		
Respondent	Pritchett Wate	r Supply Corporat	tion				
Case ID No.		, .					
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		ларргу				Percent Interest	Depreciation
Violation No.	·					5.0	
	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)	\$150	12-Sep-2023	26-Sep-2023	0.04	\$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	head o	on Well No. 22, ca	lculated from th	ie date d	of the investigation	nd corroded paint on to the date of com	pliance.
Avoided Costs	ANNU	ALIZE avoided o	osts before ei			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				1 0.00	1 40	<u> </u>	U
Approx. Cost of Compliance		\$150			TOTAL		\$0

Screening Date		<b>Docket No.</b> 2023-1663-PWS-E	PCW
Respondent	Pritchett Water Supply Corpo	oration	Policy Revision 5 (January 28, 2021)
Case ID No			PCW Revision February 11, 2021
Reg. Ent. Reference No			
	Public Water Supply		
	Christiana McCrimmon		
Violation Number			
Rule Cite(s	30	Tex. Admin. Code § 290.43(e)	
		- ',	
		otable water storage tanks and pressure mainten	
		lockable building that is designed to prevent intr	
Violation Description		truder-resistant fence with lockable gates. Specia	
	the gate on the fence surr	ounding Plant 1B was leaning out and had a large between the two gates.	e gap
		between the two gates.	
		Base P	enalty \$5,000
>> Environmental, Prope	erty and Human Health	Matrix	
>> Liivii oliillelitai, Frope	Harm	Pidulx	
Release		Minor	
<b>OR</b> Actua	I Company		
Potentia	x	Percent 15.0%	
>>Programmatic Matrix			
Falsification	Major Moderate	Minor	
		Percent 0.0%	
Matrix	•	fence could result in contamination of the facilitie I by the Facility to a significant amount of contam	
Notes Notes		d levels protective of human health.	mants
	dir irodia irot diade	a reverse processive or mannar meaning	
		Adjustment	\$4,250
			\$750
Violetian Frants			
Violation Events			
Number of	Violation Events 1	14 Number of violation day	/5
Humber of	Tiolation Events 1	14 Number of Violation da	,,5
	daily		
	weekly		
	monthly		
	quarterly x	Violation Base P	enalty \$750
	semiannual		
	annual		
	single event		
One quarterly		lated from the date of the investigation, Septem	<mark>ber 12,</mark>
	2023, to the date of	compliance, September 26, 2023.	
<b>Good Faith Efforts to Con</b>	1ply 25.0%	Rec	duction \$187
	· · · · · · · · · · · · · · · · · · ·	NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary		
	Ordinary x		
	N/A		
	The Respond	dent achieved compliance on September 26,	
	Notes	2023.	
		Violation Su	ıbtotal \$563
		violation St	ibiotai \$303
<b>Economic Benefit (EB) fo</b>	r this violation	Statutory Limit T	est
	r this violation	Statutory Limit T  \$1  Violation Final Penalt	
	ted EB Amount		y Total \$563

	E	conomic	Benefit	Woı	<b>'ksheet</b>		
Respondent	Pritchett Wate	r Supply Corporat	ion				
Case ID No.	65071						
Reg. Ent. Reference No.	RN101224608						
Media	Public Water S					Percent Interest	Years of
Violation No.	7						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$200	12-Sep-2023	26-Sep-2023	0.04	\$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 d	ate of the inves	tigation	to the date of com	<u> </u>	
Avoided Costs	ANNU	ALIZE avoided C	osts before er			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
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				<u>  0.00</u>	1 40	ΨΟ	<u> </u>
Approx. Cost of Compliance		\$200			TOTAL		\$1

Screening Dat			2023-1663-PWS-E	PCW
Responder	t Pritchett Water Supply Corp	oration	Policy I	Revision 5 (January 28, 2021)
Case ID No			PCI	W Revision February 11, 2021
Reg. Ent. Reference No				
	a Public Water Supply			
	r Christiana McCrimmon			
Violation Number				-
Rule Cite(s	30 Te:	x. Admin. Code § 290.4	5(m)(1)(B)	
		<u> </u>	( )( )(	
			re tank at least once every five	
Violation Description			5, 6, 8, 10 and 14 had not been	
	ın	spected in the past five	years.	
				+5.000
			Base Penalty	\$5,000
>> Environmental, Prop	erty and Human Health	. Matriy		
>> Lilvironmental, Flop	Harm	i Piatrix		
Releas		Minor		
OR Actu	al			
Potenti	al x		Percent 30.0%	
_				
>>Programmatic Matrix				
Falsification	n Major Moderate	Minor	Damant 0.000	
			Percent 0.0%	
Sallows had		Lancardo tara anti-	of defeats an addition to a large of	1
			of defects resulting in a loss of ontaminants which would exceed	
Notes Notes		tective of human health.	ontaminants which would exceed	
		A	djustment \$3,500	Ī
				\$1,500
Violetian Frants				
Violation Events				
Number o	f Violation Events 6	78	Number of violation days	
	daily	1		
	weekly			
	monthly			
	quarterly		Violation Base Penalty	\$9,000
	semiannual			
	annual			
	single event x			
				1
	Six single events recom	mended (one for each n	ressure tank)	
	Six single events reconn	mended (one for eden p	ressure turney.	
				4
Good Faith Efforts to Co	mply 0.0%		Reduction	\$0
	Before NOE/NOV	NOE/NOV to EDPRP/Settler	nent Offer	
	Extraordinary			
	Ordinary			
	N/A x			
	The Respon	dent does not meet the	good faith criteria for	
	Notes	this violation.	good faith criteria for	
			Violation Cubtata	±0.000
			Violation Subtotal	\$9,000
Economic Benefit (EB) fo	or this violation		Statutory Limit Test	
Estima	nted EB Amount	\$264	Violation Final Penalty Total	\$9,000
	This via	olation Final Assessed	Penalty (adjusted for limits)	\$9,000

	E	conomic	Benefit	ıoW	ksheet		
Respondent	Pritchett Wate	r Supply Corporat	tion				
Case ID No.		, .					
Reg. Ent. Reference No.							
	Public Water S	upply				Percent Interest	Years of Depreciation
Violation No.	ŭ					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Bescription							
Delayed Costs							
Equipment		1		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)	\$246	12-Sep-2023	11-Dec-2024	1.25	\$15	n/a	\$15
Notes for DELAYED costs					date of the investi	surface of the press gation to the estima	* '
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance	10.15	40.0.000		0.00	\$0	\$0	\$0
ONE-TIME avoided costs	\$246	12-Sep-2023	29-Nov-2023	0.21	\$3	\$246	\$249
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs						the pressure tank ( o the date of the sc	
Approx. Cost of Compliance		\$492			TOTAL		\$264

	Screening Date	29-Nov-2023	<b>Docket No.</b> 2023-1663-PWS-E	PCW
	Respondent	Pritchett Water Supply Corp	oration	Policy Revision 5 (January 28, 2021)
	Case ID No.			PCW Revision February 11, 2021
Reg. En	it. Reference No.			
	Media	Public Water Supply		
	Enf. Coordinator	Christiana McCrimmon		
	Violation Number	9		
	Rule Cite(s)	30 Tex Admin Code 8 29	90.46(e) and Tex. Health & Safety Code § 341.033(	a)
		20 10M 7 M 10 M 20 M 3 Z	501.10(c) and 10m 11cam a saisty sous 3 5 121055(	, <del></del> /
V	iolation Description	the Executive Director. Spe	operator who holds an applicable, valid license issue cifically, an individual with a Class "D" Water Treatr n renewed had been performing process control dut since June 2, 2023.	nent
			Base Per	nalty \$5,000
>> Envir	onmental, Prope	rty and Human Health	n Matrix	
		Harm		
OR	Release	Major Moderate	Minor	
OK	Actual		Percent 15.0%	
	Potential	Х	Percent 15.0%	
>>Progra	ammatic Matrix			
Friogra	Falsification	Major Moderate	Minor	
	T dismission:		Percent 0.0%	
			erator could expose persons served by the Facility to how would not exceed levels protective of human heal	
				\$750
<b>Violation</b>	Events			
	Number of \	/iolation Events 2	112 Number of violation days	
		al a the c	<b>a</b>	
		daily weekly	-	
		monthly	-	
		quarterly x	Violation Base Per	nalty \$1,500
		semiannual	Violation Base I el	\$1,500
		annual		
		single event	1	
			2	
	Two guartaris	s cuenta are recommended a	alculated from the data that process control duties	W0 W0
			alculated from the date that process control duties of the date of compliance, September 22, 2023.	were
	Belliy	g periorities, saite 2, 2023, e	o the date of compliance, september 22, 2023.	
0	ul. Ecc			
Good Fail	th Efforts to Com	ply 25.0%  Before NOE/NOV		ction \$375
		Extraordinary Extraordinary	NOL/NOV to EDFRE/Settlement Offer	
		Ordinary x N/A		
		19/7	J	
		Notes The Respon	dent achieved compliance on September 22, 2023.	
			Violation Sub	
Economic	c Benefit (EB) for	this violation	Statutory Limit Tes	st
	Estimat	ed EB Amount	\$2 Violation Final Penalty	Fotal \$1,125
	EStillati	Cu LD AIIIUUIIL	ΨΔ VIOIALIOII FIIIAI FERMILY	\$1,125
		This vio	olation Final Assessed Penalty (adjusted for lin	nits) \$1,125
			, , , , , , , , , , , , , , , , , , ,	

	E	conomic	<b>Benefit</b>	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	65071	er Supply Corporat	tion				
Media Violation No.	Public Water 9	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Dalassa d Carda							
Delayed Costs	ir —	1 1		1 0 00	+0	+0	+0
Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Engineering/Construction				0.00	\$0	\$0 \$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	2-Jun-2023	22-Sep-2023	0.31	\$2	n/a	\$2
Notes for DELAYED costs	valid license	e issued by the Ex	ecutive Director being performe	, calcula d to the	ated from the date e date of compliance		I duties were
Avoided Costs	ANNU	ALIZE avoided of	osts before en		<u> </u>	one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs				0.00	1 40	ΨŪ	40
Approx. Cost of Compliance		\$100			TOTAL		\$2

	Screening Date	29-100V-2023		Docket No.	2023-1663-PWS-E		PCW
	Respondent	Pritchett Water	Supply Corporati	on		Policy Re	evision 5 (January 28, 2021)
	Case ID No.	65071				PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN101224608					
	Media	Public Water Su	ylqqı				
	Enf. Coordinator	Christiana McC	rimmon				
	Violation Number	10					
	Rule Cite(s)		30 Tex	Admin. Code § 290.	46(m)		
			20 10/1	7.4 2040 3 250.	()		
	Violation Description	working condit	ion and general a	ppearance of the sys			
		Speci	fically, the paint of	n the pressure tank	at Plant 5 was failing.		
					Base	Penalty	\$5,000
>> En	vironmental, Prope	rty and Hum		atrix			
	Dalassa	Madau	Harm	NA!			
OR	<b>Release</b> Actual	Major	Moderate	Minor			
OK	Potential			X	Percent 7.0%		
	1 occindar			^	7.070		
>>Pro	grammatic Matrix						
	Falsification	Major	Moderate	Minor	<u></u>		
					Percent 0.0%		
					ance of the Facility coul		
	Notes persons serv	red by the Facili			nants which would not	exceed	
			levels protectiv	ve of human health.			
				٨٠	ljustment	\$4,650	
				Au	ijustinent	\$ <del>4</del> ,030	
							\$350
	_						
Violati	on Events						
	Number of N	Violation Events	1	78	Number of violation d	ave	
	Number of	riolation Events	1	76	INGITIBEL OF VIOLATION O	ays	
		daily					
		weekly					
		monthly					
		monthly					
		monthly quarterly			Violation Base	Penalty	\$350
		1			Violation Base	Penalty	\$350
		quarterly semiannual annual			Violation Base	Penalty	\$350
		quarterly semiannual	X		Violation Base	Penalty	\$350
		quarterly semiannual annual	x		Violation Base	Penalty	\$350
		quarterly semiannual annual		nt is recommended.	Violation Base	Penalty	\$350
		quarterly semiannual annual		nt is recommended.	Violation Base	Penalty	\$350
		quarterly semiannual annual single event		nt is recommended.	Violation Base	Penalty	·
Good F	Faith Efforts to Com	quarterly semiannual annual single event	One single eve		R	Penalty Eduction	\$350 \$0
Good F	Faith Efforts to Com	quarterly semiannual annual single event	One single eve	nt is recommended.	R		·
Good F	Faith Efforts to Com	quarterly semiannual annual single event	One single eve		R		·
Good F	Faith Efforts to Com	quarterly semiannual annual single event  aply Extraordinary Ordinary	One single eve		R		·
Good F	Faith Efforts to Com	quarterly semiannual annual single event	One single eve		R		·
Good F	Faith Efforts to Com	quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A	One single eve	E/NOV to EDPRP/Settlem	R		·
Good F	Faith Efforts to Com	quarterly semiannual annual single event  aply Extraordinary Ordinary	One single eve	E/NOV to EDPRP/Settlem	ent Offer		·
Good F	Faith Efforts to Com	quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A	One single eve	E/NOV to EDPRP/Settlem	ent Offer		·
Good F	Faith Efforts to Com	quarterly semiannual annual single event  eply  Extraordinary Ordinary N/A	One single eve	E/NOV to EDPRP/Settlem	ent Offer	eduction	·
		quarterly semiannual annual single event  ply  Extraordinary Ordinary N/A Notes	One single eve	E/NOV to EDPRP/Settlem	ent Offer good faith criteria for Violation	eduction [	\$0
	Faith Efforts to Com	quarterly semiannual annual single event  ply  Extraordinary Ordinary N/A Notes	One single eve	E/NOV to EDPRP/Settlem	ent Offer good faith criteria for	eduction [	\$0
	mic Benefit (EB) for	quarterly semiannual annual single event  ply  Extraordinary Ordinary N/A Notes	One single eve	does not meet the g	ent Offer good faith criteria for Violation	eduction Subtotal	\$0
	mic Benefit (EB) for	quarterly semiannual annual single event  Extraordinary Ordinary N/A Notes	One single eve	does not meet the g this violation.	ent Offer  good faith criteria for  Violation  Statutory Limit	Subtotal Test	\$0

	E	conomic	Benefit	Woı	rksheet					
Respondent	Pritchett Wate	r Supply Corporat	tion							
Case ID No.	65071									
Reg. Ent. Reference No.										
	Public Water S						Years of			
Violation No.		. ч. р. ,				Percent Interest	Depreciation			
Violation No.						5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item Description										
p										
Delayed Costs										
Equipment				0.00	\$0	\$0	\$0			
Buildings				0.00	\$0	\$0	\$0			
Other (as needed)	\$500	12-Sep-2023	11-Dec-2024	1.25	\$2	\$42	\$44			
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  Avoided Costs	(	calculated from the	e date of the inv	estigati	on to the estimate	n the pressure tank d date of complianc	e.			
Avoided Costs  Disposal	ANNO	ALIZE avoided C	osts before en	0.00	\$0	\$0	\$0			
Personnel				0.00	\$0	\$0 \$0	\$0 \$0			
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0 \$0			
Supplies/Equipment				0.00	\$0	\$0 \$0	\$0			
Financial Assurance				0.00	\$0	\$0 \$0	\$0			
ONE-TIME avoided costs				0.00	\$0	\$0	\$0			
Other (as needed)				0.00	\$0	\$0	\$0			
Notes for AVOIDED costs				0.00	1 40	Ψ0	40			
Approx. Cost of Compliance		\$500			TOTAL		\$44			

	Screening Date	29-Nov-2023		Do	cket No.	2023-1663-	PWS-E			PCW
	Respondent	Pritchett Water	Supply Corpo	ration				Policy Re	evision 5 (Janu	ary 28, 2021)
	Case ID No.							PCW	Revision Febr	ruary 11, 2021
Reg.	Ent. Reference No.	RN101224608								
	Media	Public Water Su	ipply							
	Enf. Coordinator	Christiana McCr	immon							
	Violation Number	11								
	Rule Cite(s)		30 T	ex. Admin. Co	nde 8 290 4	3(c)(8)				
			30 1	exi ramini ce	ouc 3 25011.	3(0)				
		Failed to ensur	e that all clea	rwells, ground	d storage ta	nks ("GSTs"	), standpipe	es, and		
		elevated storag	je tanks are p	ainted, disinfo	ected, and r	maintained in	strict acco	rdance		
	Violation Description									
		the coating or		ch on the GST un down the s			d, causing r	ust to		
			rı	in down the s	side of the G	351.				
							Base P	enalty		\$5,000
E	duanmantal Duana	what a mad Illanda	an Uaalah	Matrix						
// CIIV	vironmental, Prope	ity and num	Harm	Matrix						
	Release	Major	Moderate	Minor						
OR	Actual									
	Potential		Х			Percent	15.0%			
						_				
>>Prog	grammatic Matrix									
	Falsification	Major	Moderate	Minor		_				
						Percent	0.0%			
	Matrix	ure that the GST								
	Notes the Facility I	o a significant a				ot exceed lev	els protecti	ive of		
			n	uman health.						
					٨٨٠	justment		\$4,250		
					Auj	justilient		\$ <del>4</del> ,230		
										\$750
Violatio	on Events									
	Normalian at 1	/:- -+:	-	1 17	70					
	Number of V	/iolation Events	1	] <u>L</u>	78	Number of v	lolation day	ys		
		daily		1						
		weekly								
		monthly								
		quarterly	х			Violati	ion Base P	enalty		\$750
		semiannual								
		annual								
		single event								
	One quarterly	event is recomn	nended, calcu	lated from the	e date of th	e investigatio	on. Septem	her 12.		
				screening, N			,	,		
Good F	aith Efforts to Com	nlv	0.0%				Po	duction		\$0
JUUU F	and Life to com		efore NOE/NOV	NOE/NOV to ED	PRP/Settleme	ent Offer	Kei	auction		ΨΟ
		Extraordinary	. ,	,	,	1				
		Ordinary				•				
		N/A	Х			Ш				
		ĺ								
		Notes	The Respond	ent does not	_	ood faith crite	eria for			
				tnis	violation.					
		Ц						_		
						V	iolation Su	ubtotal		\$750
Ecoro	nic Ronofit (ED) for	thic vicint	<b>.</b> n			Ctatutara	, l imit T	oct		
Econon	nic Benefit (EB) for	uns violatio	ווע			Statutory	, Limit I	est		
	Estimate	ed EB Amount		\$93	•	Violation Fi	nal Penalt	y Total		\$750
				·				_		
			This vio	lation Final	Assessed F	Penalty (adj	usted for	limits)		\$750

	E	conomic	Benefit	Woi	rksheet		
Respondent	Pritchett Wate	r Supply Corporat	tion				
Case ID No.	65071						
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		ч				Percent Interest	Depreciation
Violation ito.						5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$1,000	12-Sep-2023	10-Jan-2025	1.33	\$4	\$89	\$93
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	on the GST at	Plant 8 to meet of	current AWWA s estimate	tandard: ed date (	s, calculated from of compliance.	exterior coating on the date of the inve	stigation to the
Avoided Costs	ANNU	ALIZE avoided o	costs before er	ntering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,000			TOTAL		\$93

		.9 2410	29-Nov-2023		Do	cket No. 2023-1663	3-PWS-E	PCW
	Resp	ondent	Pritchett Water	r Supply Corpo	ration		Pol	icy Revision 5 (January 28, 2021)
		ID No.						PCW Revision February 11, 2021
Reg.	Ent. Refere							
			Public Water S					
	Enf. Coor	dinator	Christiana McC	rimmon				
	Violation	Number	12					
	Rul	e Cite(s)	20 Toy Ad	lmin Codo S 2	00.45/6)/1)/0	()(iii) and Tex. Health	% Cafaty Codo S	
			30 Tex. Ad	iiiiii. Code g 2	341.03 341.03		& Salety Code 9	
					341.0	)13(C)		
			Failed to provi	ide two or mor	e service pum	ps having a total capa	city of 2.0 gpm p	<mark>oer</mark>
	Violation De	scrintion				3 connections requirir		0
	Violation De	oci iptioii	capacity of			00 gpm of service pum	np capacity were	
				provid	led, indicating	a 33% deficiency.		
							Page Dane	φE 000
							Base Pena	slty \$5,000
>> Fnv	vironmental	, Prone	rtv and Hun	nan Health	Matrix			
		, орс	, and man	Harm				
		Release	Major	Moderate	Minor			
OR		Actual						
		Potential		Х		Percent	15.0%	
>>Pro	grammatic	Matrix						
	Fal	Isification	Major	Moderate	Minor	_		
						Percent	0.0%	
						result in water outage		
	Notes pro	oblems, ex				ignificant amount of c	ontaminants whic	ch
	Notes		would	not exceed le	vels protective	e of human health.		
						Adjustment	\$4,2	250
								\$750
								\$750
Violatio	on Events							
Tiolati								
	N	umber of \	Violation Events	1		78 Number of	violation days	
					<u></u>		•	
			daily					
			daily weekly					
			weekly	X		Viola	ation Base Pena	s <b>ilty</b> \$750
			weekly monthly	X		Viola	ntion Base Pena	si <b>ty</b> \$750
			weekly monthly quarterly	X		Viola	ntion Base Pena	slty \$750
			weekly monthly quarterly semiannual	X		Viola	ation Base Pena	<b>slty</b> \$750
			weekly monthly quarterly semiannual annual	X		Viola	ation Base Pena	s750 \$750
	One		weekly monthly quarterly semiannual annual single event		lated from the	Violate of the investiga		
	One		weekly monthly quarterly semiannual annual single event	mended, calcu				
	One		weekly monthly quarterly semiannual annual single event	mended, calcu		e date of the investiga		
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calcu		e date of the investiga	tion, September	12,
Good F	One Faith Efforts	quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calcu	ne screening,	e date of the investiga		12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calcu o the date of th  0.0% Before NOE/NOV	ne screening,	e date of the investiga November 29, 2023.	tion, September	12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calcu o the date of th  0.0% Before NOE/NOV	ne screening,	e date of the investiga November 29, 2023.	tion, September	12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calcu	ne screening,	e date of the investiga November 29, 2023.	tion, September	12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calcu	ne screening,	e date of the investiga November 29, 2023.	tion, September	12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to ply Extraordinary Ordinary N/A	mended, calculo the date of th	NOE/NOV to ED	PRP/Settlement Offer	tion, September Reduct	12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to	mended, calculo the date of th	NOE/NOV to ED	e date of the investiga November 29, 2023.	tion, September Reduct	12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to ply Extraordinary Ordinary N/A	mended, calculo the date of th	NOE/NOV to ED	PRP/Settlement Offer	tion, September Reduct	12,
Good F		quarterly	weekly monthly quarterly semiannual annual single event event is recom 2023, to ply Extraordinary Ordinary N/A	mended, calculo the date of th	NOE/NOV to ED	PRP/Settlement Offer meet the good faith cr	tion, September Reduct	12, ion \$0
	aith Efforts	quarterly	weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A  Notes	mended, calculo the date of th	NOE/NOV to ED	PRP/Settlement Offer meet the good faith cryiolation.	Reduct	12, ion \$0
		quarterly	weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A  Notes	mended, calculo the date of th	NOE/NOV to ED	PRP/Settlement Offer meet the good faith cryiolation.	Reduct	12, ion \$0
	aith Efforts	to Com	weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A Notes	mended, calculo the date of th	NOE/NOV to ED	PRP/Settlement Offer meet the good faith criviolation.	Reduct iteria for Violation Subtory Limit Test	12, ion \$0
	aith Efforts	to Com	weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A  Notes	mended, calculo the date of th	NOE/NOV to ED	PRP/Settlement Offer meet the good faith criviolation.	Reduct	12, ion \$0
	aith Efforts	to Com	weekly monthly quarterly semiannual annual single event  event is recom 2023, to  ply  Extraordinary Ordinary N/A Notes	mended, calculo the date of the O.0%  O.0%  Sefore NOE/NOV  X  The Respond  On	NOE/NOV to ED	PRP/Settlement Offer meet the good faith criviolation.	Reduct iteria for  Violation Subtory Limit Test	12, ion \$0  *tal \$750

	E	conomic	Benefit	Woi	<b>'ksheet</b>		
Respondent	Pritchett Wate	r Supply Corpora	tion				
Case ID No.		, .					
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		чаррі,				Percent Interest	Depreciation
7101411011 1101						5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$5,000	12-Sep-2023	10-May-2025	1.66	\$28	\$553	\$581
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	,		nnection at Plan	t 17, cal		service pumps with late of the investiga	
Avoided Costs	ANNU	ALIZE avoided o	costs before er	ntering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$5,000			TOTAL		\$581

S	creening Date			<b>0.</b> 2023-1663-PWS-E	PCW
	•	Pritchett Water Supply Corpo	oration		Policy Revision 5 (January 28, 2021)
	Case ID No.				PCW Revision February 11, 2021
Reg. Ent. I	Reference No.				
_		Public Water Supply			
		Christiana McCrimmon			
V	iolation Number		200 4E(h)(1)(C)(i) and	Tex. Health & Safety Cod	- S
	Rule Cite(s)	30 Tex. Admin. Code 9	341.0315(c)	I Tex. Health & Salety Cou	e g
			311.0313(0)		
			it		
Viola	ation Description	Failed to provide a well cap had 223 connections requir			
7.0.0	icion Descripcion		were provided, indicat	= -	, o gpiii
		. ,	, ,	,	
				Base F	Penalty \$5,000
>> Environ	mental Proper	rty and Human Health	Matrix		
>> LIIVII OIII	illelital, Propei	Harm	I Matrix		
	Release	Major Moderate	Minor		
OR	Actual			_	
	Potential	Х		Percent 15.0%	
>> Drogram	matic Matrix				
Program	Falsification	Major Moderate	Minor		
				Percent 0.0%	
Motor	Failure to	provide adequate well capac	city could expose perso	ons served by the Facility to	o a
Matr Note	significant a	amount of contaminants that		els that are protective of hu	<mark>ıman                                      </mark>
Note			health.		
				Adjustment	\$4,250
				Aujustinent	Ψ4,230
					\$750
Violation Ev	onto				
Violation Ev	CIILS				
	Number of \	/iolation Events 1	78	Number of violation da	ys
			-		
		daily			
		weekly			
		monthly	1	Violation Base F	Penalty \$750
		quarterly <u>x</u> semiannual	1	Violation base r	\$730
		annual	1		
		single event			
			-1		
	One quarterly	event is recommended, calcu	ulated from the date of	f the investigation, Septem	ber 12,
		2023, to the date of t	he screening, Novemb	er 29, 2023.	
			_		
Good Faith I	Efforts to Com				duction \$0
		Before NOE/NOV	NOE/NOV to EDPRP/Settle	ement Offer	
		Extraordinary			
		Ordinary			
		N/A x	<u> </u>		
		Notes The Respond		e good faith criteria for	
		110000	this violation		
				Violation S	ubtotal \$750
<b>Economic Bo</b>	enefit (EB) for	this violation		Statutory Limit T	est
	Estimate	ed EB Amount	\$581	Violation Final Penalt	y Total \$750
	250000				-
		This vio	lation Final Assesse	d Penalty (adjusted for	<b>limits)</b> \$750

	E	conomic	Benefit	Woi	ksheet		
Respondent	Pritchett Wate	er Supply Corporat	ion				
Case ID No.	65071						
Reg. Ent. Reference No.	RN101224608	3					
Media Violation No.	Public Water 9	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$5,000	12-Sep-2023	10-May-2025	1.66	\$28	\$553	\$581
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	connection a	t Plant 17, calcula	ited from the da	te of th	e investigation to t	pacity of at least 0. the estimated date of	of compliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before er			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
				0.00	\$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0
Other (as needed)		_		0.00	<b>3</b> 0	<b>\$</b> U	<b>\$</b> U
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$5,000			TOTAL		\$581

Screening Date		<b>Docket No.</b> 2023-1663-PWS-E	PCW
	Pritchett Water Supply Corpor	ration	Policy Revision 5 (January 28, 2021)
Case ID No.			PCW Revision February 11, 2021
Reg. Ent. Reference No.			
	Public Water Supply		
	Christiana McCrimmon		
Violation Number			
Rule Cite(s)	30 Tex. Admin. Code § 2	90.45(b)(1)(C)(i) and Tex. Health & Safety Co	ode §
		341.0315(c)	
		ity of 0.6 gpm per connection. Specifically, Pla	
Violation Description		vell capacity of 42 gpm. However, only 40 gpr	n of well
	capacity were	e provided, indicating a 5% deficiency.	
		_	- "
		Base	Penalty \$5,000
>> Environmental, Prope	rty and Human Health	Matrix	
	Harm		
Release		Minor	
OR Actua		B 7.004	
Potentia		x Percent 7.0%	
>>Programmatic Matrix			
Falsification	Major Moderate	Minor	
T dismission.		Percent 0.0%	
<u> </u>	<u>'</u>		
Failure to	provide adequate well capacit	y could expose persons served by the Facility	to an
Matrix		would not exceed levels that are protective of	
Notes		health.	
<u></u>			
		Adjustment	\$4,650
			\$350
			,,,,,
<b>Violation Events</b>			
Number	Violeties Frants	Number of violeties	January 1
Number of	Violation Events 1	Number of violation of	lays
	daily		
	weekly		
	monthly		
	quarterly	Violation Base	Penalty \$350
	semiannual		
	annual		
	single event x		
	One single	event is recommended.	
	one single c	vent is recommended.	
<u>-</u>			
<b>Good Faith Efforts to Con</b>			Reduction \$0
		NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary		
	Ordinary		
	N/A x		
	The Responde	ent does not meet the good faith criteria for	
	Notes	this violation.	
		Violation	Subtotal \$350
Economic Benefit (EB) fo	r this violation	Statutory Limit	Test
Economic Delient (EB) 10	i tiiis viviativii	Statutory Limit	
Estimat	ed EB Amount	\$291 Violation Final Pena	Ity Total \$350
The state of the s	led LD Alliount	Ψ231 Violation i mai i ena	φ330
		ation Final Assessed Penalty (adjusted fo	

	E	conomic	Benefit	Woı	ksheet		
Respondent	Pritchett Wate	r Supply Corporat	ion				
Case ID No.	65071						
Reg. Ent. Reference No.	RN101224608						
	Public Water S					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$2,500	12-Sep-2023	10-May-2025	1.66	\$14	\$277	\$291
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	connection a	at Plant 5, calcula	ted from the dat	e of the	investigation to th	pacity of at least 0. ne estimated date o	f compliance.
Avoided Costs	ANNU	ALIZE avoided o	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs				<u>  0.00</u>	1 40	<u> </u>	ΨÜ
Approx. Cost of Compliance		\$2,500			TOTAL		\$291

		ening Date	23 1404 2023			et No. 2023-1663-PWS-E		PCW
	F	Respondent	Pritchett Wate	r Supply Corpo	ration		Policy Re	evision 5 (January 28, 2021)
	(	Case ID No.	65071				PCW	Revision February 11, 2021
Reg.	Ent. Ref	erence No.	RN101224608					
		Media	Public Water S	Supply				
	Enf. C	coordinator	Christiana McC	Crimmon				
	Viola	ation Number	15					
		Rule Cite(s)		30	Tex. Admin. Cod	e 8 290 46(I)		
						3 250.10(1)		
	Violatio	n Description	had not been	flushing all dea	ad-end mains mo	intervals. Specifically, the Res nthly and had not been flushin separate pressure planes.		
						Base	Penalty	\$5,000
>> En	vironme	ntal, Prope	rty and Hur	nan Health	Matrix			
			_	Harm				
0.0		Release	Major	Moderate	Minor			
OR		Actual				<b>B</b>		
		Potential		Х		Percent 15.0%		
>> Dro	aramma	tic Matrix						
//P10	yı alılılı	Falsification	Major	Moderate	Minor			
		Taismeation	Major	Hoderate	Millor	Percent 0.0%		
						0.070		
	Matrix					l expose persons served by th		
	Notes	to a significan	t amount or co	ntaminants wn	ich would not exc	eed levels protective of huma	n neaith.	
						Adjustment	\$4,250	
							_	.===
								\$750
							_	
Wielsti	on Evon	<b>L</b> a					_	
Violati	on Even	ts						
Violati	on Even		/iolation Events	1	1	78 Number of violation d	lavs	
Violati	on Even		/iolation Events	5 1		78 Number of violation d	lays	
Violati	on Even		iolation Events	1		78 Number of violation d	lays	
Violati	on Even			1		78 Number of violation d	lays	
Violati	on Even		daily	1		78 Number of violation d	lays	
Violati	on Even		daily weekly	5 1 x		Number of violation d  Violation Base		\$750
Violati	on Even		daily weekly monthly					\$750
Violati	on Even		daily weekly monthly quarterly semiannual annual					\$750
Violati	on Even		daily weekly monthly quarterly semiannual					\$750
Violati	on Even		daily weekly monthly quarterly semiannual annual					\$750
Violati	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	X	lated from the da		Penalty	\$750
Violati	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	x x	lated from the da	Violation Base	Penalty	\$750
Violati	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	x x		Violation Base	Penalty	\$750
		Number of \	daily weekly monthly quarterly semiannual annual single event	x x		Violation Base when the investigation, September 29, 2023.	Penalty	\$750
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023	x  mended, calcu , to the date of  0.0%  Before NOE/NOV		Violation Base  Sete of the investigation, September 29, 2023.	Penalty  mber 12,	·
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023	x  mended, calcu , to the date of  0.0%  Before NOE/NOV	screening, Nove	Violation Base  Sete of the investigation, September 29, 2023.	Penalty  mber 12,	·
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023	x  mmended, calcu , to the date of  0.0%  Before NOE/NOV	screening, Nove	Violation Base  Sete of the investigation, September 29, 2023.	Penalty  mber 12,	·
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023,  ply  Extraordinary	x mmended, calcu , to the date of  0.0%  Before NOE/NOV	screening, Nove	Violation Base  Sete of the investigation, September 29, 2023.	Penalty  mber 12,	·
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023,  ply  Extraordinary Ordinary	x x x x x x x x x x x x x x x x x x x	NOE/NOV to EDPRP	Violation Base  Atte of the investigation, September 29, 2023.  R  //Settlement Offer	Penalty  mber 12,	·
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023,  ply  Extraordinary Ordinary	x  mmended, calcu , to the date of  0.0%  Before NOE/NOV  x  The Respond	NOE/NOV to EDPRP	Violation Base  ate of the investigation, September 29, 2023.  Rettlement Offer  et the good faith criteria for	Penalty  mber 12,	·
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023,  ply  Extraordinary Ordinary	x  mmended, calcu , to the date of  0.0%  Before NOE/NOV  x  The Respond	NOE/NOV to EDPRP	Violation Base  ate of the investigation, September 29, 2023.  Rettlement Offer  et the good faith criteria for	Penalty  mber 12,	·
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023,  ply  Extraordinary Ordinary	x  mmended, calcu , to the date of  0.0%  Before NOE/NOV  x  The Respond	NOE/NOV to EDPRP	Violation Base  Atte of the investigation, September 29, 2023.  R  //Settlement Offer  et the good faith criteria for ation.	mber 12,	\$0
		Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023,  ply  Extraordinary Ordinary	x  mmended, calcu , to the date of  0.0%  Before NOE/NOV  x  The Respond	NOE/NOV to EDPRP	Violation Base  ate of the investigation, September 29, 2023.  Rettlement Offer  et the good faith criteria for	mber 12,	·
Good I	Faith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event  event is recom 2023;  ply  Extraordinary Ordinary N/A	x mended, calcu, to the date of  0.0% Before NOE/NOV	NOE/NOV to EDPRP	Violation Base  Atte of the investigation, September 29, 2023.  R  //Settlement Offer  et the good faith criteria for ation.	mber 12,	\$0
Good I	Faith Eff	One quarterly orts to Com	daily weekly monthly quarterly semiannual annual single event  event is recom 2023  ply  Extraordinary Ordinary N/A  Notes	x mended, calcu, to the date of  0.0% Before NOE/NOV  x The Respond	NOE/NOV to EDPRP	Violation Base  ate of the investigation, September 29, 2023.  /Settlement Offer  et the good faith criteria for ation.  Violation S  Statutory Limit	mber 12, Reduction Subtotal Test	\$0
Good I	Faith Eff	One quarterly orts to Com	daily weekly monthly quarterly semiannual annual single event  event is recom 2023;  ply  Extraordinary Ordinary N/A	x mended, calcu, to the date of  0.0% Before NOE/NOV  x The Respond	NOE/NOV to EDPRP	Violation Base  Atte of the investigation, September 29, 2023.  Rettlement Offer  Attention September 29, 2023.  Violation September 29, 2023.	mber 12, Reduction Subtotal Test	\$0

	E	conomic	Benefit	Woı	<b>ksheet</b>			
Respondent	Pritchett Wate	Pritchett Water Supply Corporation						
Case ID No.								
Reg. Ent. Reference No.	RN101224608	}						
	Public Water 9					Percent Interest	Years of Depreciation	
						5.0	15	
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount	
Item Description		•						
Delayed Costs								
Equipment				0.00	\$0	\$0	\$0	
 Buildings				0.00	\$0	\$0	\$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	12-Sep-2023	26-Mar-2025	1.54	\$8	n/a	\$8	
Notes for DELAYED costs	,	date of t	he investiagtion	to the	estimated date of			
Avoided Costs	ANNU	ALIZE avoided C	osts before er			one-time avoided	·	
Disposal				0.00	\$0	\$0	\$0 \$0	
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0	
ONE-TIME avoided costs				0.00	\$0	\$0	\$0	
Other (as needed)				0.00	\$0	\$0	\$0	
other (as needed)		<u> </u>		0.00	Ψ0	30	\$0	
Notes for AVOIDED costs								
Approx. Cost of Compliance		\$100			TOTAL		\$8	

	Screening Date	29-Nov-2023		Docke	et No. 2023-1663-PWS-E		PCW
	Respondent	Pritchett Water	Supply Corpo	oration		Policy Revision 5	(January 28, 2021)
	Case ID No.	65071				PCW Revision	n February 11, 2021
Reg.	<b>Ent. Reference No.</b>	RN101224608					
	Media	Public Water Su	ipply				
	Enf. Coordinator	Christiana McCr	immon				
	Violation Number	16					
	Rule Cite(s)		30	Tex. Admin. Code	8 290 46(i)		
			30	Text Marrier Cour	3 3 230. 10(1)		
		Failed to co	mplete a Cus	tomer Service In	spection ("CSI") certificate prid	or to	
					struction or any existing servi		
	Violation Description				cross-connection or other pot		
		contamination		s. Specifically, the for all 158 new co	Respondent had not complete	ed CSIs	
			'	or all 136 flew co	milections.		
	!						
					Base	Penalty	\$5,000
>> Fnv	vironmental, Prope	rty and Hum	an Health	Matriy			
LIII	vironinental, i rope	cy and main	Harm	Fidulix			
	Release	Major	Moderate	Minor			
OR	Actual						
	Potential	Х			Percent 30.0%		
>>Pro	grammatic Matrix	Major	Madarata	Minor			
	Falsification	Major	Moderate	Minor	Percent 0.0%		
					Percent 0.0%		
	Matrix Failure to cond	duct CSIs may re	esult in perso	ns served by the	Facility being exposed to conta	<mark>aminants</mark>	
	Notes	which w	ould exceed I	evels protective of	f human health.		
					Adjustment	\$3,500	
							\$1,500
\/: <u>_</u>  :	on Evente						
Violati	on Events						
	Number of \	/iolation Events	3		78 Number of violation da	avs	
		Ц		<u> </u>		,	
		daily					
		weekly					
		monthly	Х				
		quarterly			Violation Base	Penalty	\$4,500
		semiannual					
		annual					
		single event					
	Three monthly				e date of the investigation, Se	<mark>ptember</mark>	
		12, 2023	, to the date	of screening, Nov	ember 29, 2023.		
Good F	aith Efforts to Com		0.0%		R	eduction	\$0
		To the second se	efore NOE/NOV	NOE/NOV to EDPRP,	Settlement Offer		
		Extraordinary					
		Ordinary					
		N/A	Х				
			The Respond	lent does not mee	et the good faith criteria for		
		Notes	. Ac Acapona	this viol	_		
		Į.					
					Violation S	Subtotal	\$4,500
					Violation		φτ,500
Econor	nic Benefit (EB) for	this violation	on		Statutory Limit	Test	
	Estimate	ed EB Amount		\$200	Violation Final Penal	tv Total	\$4,500
			This vio	lation Final Ass	essed Penalty (adjusted fo	r limits)	\$4,500

	E	conomic	Benefit	Wor	ksheet		
	Pritchett Water Supply Corporation						
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S	upply				<b>Percent Interest</b>	Years of Depreciation
Violation No.	16						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Dolayed Costs							
Delayed Costs Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	10.000	10.0		0.00	\$0	n/a	\$0
Record Keeping System	\$3,000	12-Sep-2023	11-Dec-2024	1.25	\$187	n/a	\$187
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	12-Sep-2023	9-Feb-2025	1.41	\$13	n/a	\$13
Notes for DELAYED costs	The Record Keeping delayed cost includes the estimated amount to conduct CSIs at all 158 new locations where cross-connections or potential contamination hazards may exist, calculated from the date of the investigation to the estimated date of compliance.						
Avoided Costs	that all serv	vice connections a	re properly insp estimate	ected, c	calculated from the of compliance.	nplement a CSI progedate of the investige	gation to the
Disposal	ANNO	ALIZE avoided C	osts before er	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		\$3,180			TOTAL		\$200

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 CN600665442, RN101224608, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

**Customer, Respondent,** CN600665442, Pritchett Water Supply

Corporation

**Regulated Entity:** RN101224608, PRITCHETT WSC

Classification: NOT APPLICABLE

Classification: NOT APPLICABLE Rating: N/A

Rating: N/A

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

CH Group: 14 - Other

**Location:** LOCATED ON STATE HIGHWAY 155 SOUTHWEST OF GILMER IN UPSHUR COUNTY, TEXAS

TCEQ Region: REGION 05 - TYLER

ID Number(s):

or Owner/Operator:

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION WATER LICENSING LICENSE 2300012

2300012

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

Date Compliance History Report Prepared: May 28, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 28, 2019 to May 28, 2024

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

Name: Christiana McCrimmon Phone: (512) 239-2811

#### Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period? YES

2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

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

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

N/A

**B.** Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

N/A

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

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

N/A

F. Environmental audits:

NI/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:  $\ensuremath{\mathsf{N}/\mathsf{A}}$ 

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

**Sites Outside of Texas:** 

N/A

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	8	
CONCERNING	\$	TEXAS COMMISSION ON
PRITCHETT WATER SUPPLY	S	TEAAS COMMISSION ON
CORPORATION	§	
RN101224608	§	ENVIRONMENTAL QUALITY

### AGREED ORDER DOCKET NO. 2023-1663-PWS-E

#### I. JURISDICTION AND STIPULATIONS

On	, the Texas Commission on Environmental Quality ("the
Commission" or "TCEQ	') considered this agreement of the parties, resolving an enforcement
action regarding Pritch	ett Water Supply Corporation (the "Respondent") under the authority of
TEX. HEALTH & SAFETY CO	DE ch. 341. The Executive Director of the TCEQ, through the
Enforcement Division, a	and the Respondent together stipulate that:

- 1. The Respondent owns and operates a public water supply located on State Highway 155 Southwest of Gilmer, Upshur County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 3,363 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. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to Tex. Water Code § 7.002 and Tex. Health & Safety Code § 341.049, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to Tex. Water Code § 5.013 and Tex. Health & Safety Code § 341.031 because it alleges violations of Tex. Health & Safety Code ch. 341 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$29,901 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$23,921 of the penalty and \$5,980 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount 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 of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 Tex. ADMIN. CODE § § 70.10(a). Any notice and procedures, which might otherwise be authorized or

required in this action, are waived in the interest of a more timely resolution of the matter.

- 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 or conditions in this Order.
- 7. 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.
- 8. 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.
- 9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Facility:
  - a. By September 22, 2023, began using a water works operator who holds an applicable, valid license issued by the Executive Director;
  - b. By September 26, 2023, repainted the corroded well head on Well No. 22; and
  - c. By September 26, 2023, repaired the fence surrounding Plant 1B.

#### II. ALLEGATIONS

During an investigation at the Facility conducted on September 12, 2023 through September 13, 2023, an investigator documented that the Respondent:

- 1. Failed to provide a well capacity of 0.6 gallons per minute ("gpm") per connection, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c). Specifically, Plant 21 had 118 connections requiring a well capacity of 71 gpm. However, only 48 gpm of well capacity were provided, indicating a 32% deficiency. Plant 15 had 158 connections requiring a well capacity of 95 gpm. However, only 83 gpm of well capacity were provided, indicating a 12% deficiency. Plant 2 had 99 connections requiring a well capacity of 59 gpm. However, only 44 gpm of well capacity were provided, indicating a 26% deficiency. Plant 10 had 121 connections requiring a well capacity of 73 gpm. However, only 52 gpm of well capacity were provided, indicating a 28% deficiency.
- 2. Failed to provide a pressure tank capacity of 20 gallons per connection, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(D)(iv) and Tex. Health & Safety Code § 341.0315(c). Specifically, Plant 1B had 348 connections requiring a pressure tank capacity of 6,960 gallons. However, only 3,000 gallons were provided, indicating a 57% deficiency.
- 3. Failed to provide a total storage capacity of 200 gallons per connection, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(C)(ii) and Tex. Health & Safety Code § 341.0315(c). Specifically, Plant 2 had 99 connections requiring a storage capacity of 19,800 gallons. However, only 15,000 gallons of storage capacity were provided, indicating a 24% deficiency.

- 4. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system facilities and equipment, in violation of 30 Tex. Admin. Code § 290.46(m). Specifically, the device used to determine the airwater-volume in the pressure tanks at Plants 10, 1B, 8, 5 and 17 were dirty and hard to read.
- 5. Failed to provide all Facility wells with a concrete sealing block that extends a minimum of three feet from the well casing in all directions, with a minimum thickness of six inches and sloped to drain away at not less than 0.25 inches per foot, in violation of 30 Tex. Admin. Code § 290.41(c)(3)(J). Specifically, the sealing block on Well No. 21 had a crack.
- 6. 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). Specifically, some of the paint on the well head was flaking and corroded on Well No. 22.
- 7. Failed to ensure that 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). Specifically, the gate on the fence surrounding Plant 1B was leaning out and had a large gap between the two gates.
- 8. Failed to inspect the interior of the Facility's pressure tank at least once every five years, in violation of 30 Tex. Admin. Code § 290.46(m)(1)(B). Specifically, the pressure tanks at Plants 4, 5, 6, 8, 10, and 14 had not been inspected in the past five years.
- 9. Failed to use a water works operator who holds an applicable, valid license issued by the Executive Director, in violation of 30 Tex. Admin. Code § 290.46(e) and Tex. Health & Safety Code § 341.033(a). Specifically, an individual with a Class "D" Water Treatment License that had not been renewed had been performing process control duties since June 2, 2023.
- 10. 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). Specifically, the paint on the pressure tank at Plant 5 was failing.
- 11. Failed to ensure that all clearwells, ground storage tanks ("GSTs"), standpipes, and elevated storage tanks are painted, disinfected, and maintained in strict accordance with current American Water Works Association ("AWWA") standards, in violation of 30 Tex. ADMIN. CODE § 290.43(c)(8). Specifically, the coating on the roof hatch on the GST at Plant 8 was corroded, causing rust to run down the side of the GST.
- 12. 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)(C)(iii) and Tex. Health & SAFETY CODE § 341.0315(c). Specifically, Plant 17 had 223 connections requiring a service pump capacity of 446 gpm. However, only 300 gpm of service pump capacity were provided, indicating a 33% deficiency.
- Failed to provide a well capacity of 0.6 gpm per connection, in violation of 30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c).

Specifically, Plant 17 had 223 connections requiring a well capacity of 134 gpm. However, only 100 gpm of well capacity were provided, indicating a 25% deficiency.

- 14. Failed to provide a well capacity of 0.6 gpm per connection, in violation of 30 Tex. ADMIN. CODE § 290.45(b)(1)(C)(i) and Tex. Health & Safety Code § 341.0315(c). Specifically, Plant 5 had 70 connections requiring a well capacity of 42 gpm. However, only 40 gpm of well capacity were provided, indicating a 5% deficiency.
- 15. Failed to flush all dead-end mains at monthly intervals, in violation of 30 Tex. Admin. Code § 290.46(l). Specifically, the Respondent had not been flushing all dead-end mains monthly and had not been flushing dead-end mains created by valves to separate pressure planes.
- 16. 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 a cross-connection or other potential contamination hazard exists, in violation of 30 Tex. ADMIN. CODE § 290.46(j). Specifically, the Respondent had not completed CSIs for all 158 new connections.

#### III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

### IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Pritchett Water Supply Corporation, Docket No. 2023-1663-PWS-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality 12100 Park 35 Circle Austin, Texas 78753

- 2. The Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Order:
    - i. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including repairing or replacing the device used to determine air-water volume on the pressure tank at Plants 10, 1B, 8, 5, and 17, in accordance with 30 Tex. Admin. Code § 290.46;

- ii. Conduct an inspection of the interior of the Facility's pressure tanks at Plants 4, 5, 6, 8, 10, and 14, in accordance with 30 Tex. ADMIN. CODE § 290.46;
- iii. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, including repairing the paint on the pressure tank at Plant 5, in accordance with 30 Tex. Admin. Code § 290.46;
- iv. Begin flushing all dead-end mains at monthly intervals or more often as needed if water quality complaints are received from water customers or if disinfectant residuals fall below acceptable levels, in accordance with 30 Tex. Admin. Code § 290.46. This provision will be satisfied upon three months of consecutive compliant monthly flushing; and
- v. Conduct a CSI at all locations where cross-connections or potential contamination hazards may exist, including but not limited to the 158 new connections, in accordance with 30 Tex. ADMIN. CODE § 290.46.
- b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.i below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.i through 2.a.iii and 2.a.v.
- c. Within 60 days after the effective date of this Order, repair or replace the exterior coating on the roof hatch on the GST at Plant 8 to meet current AWWA standards, in accordance with 30 Tex. ADMIN. CODE § 290.43.
- d. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.i below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.c.
- e. Within 90 days after the effective date of this Order:
  - i. Repair the crack in the concrete sealing block at Well No. 21, in accordance with 30 Tex. Admin. Code § 290.41; and
  - ii. Implement a CSI program to ensure all service connections are properly inspected, in accordance with 30 Tex. ADMIN. CODE § 290.46.
- f. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.i below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.e.i and 2.e.ii.
- g. Within 135 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.i below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a.iv.

- h. Within 180 days after the effective date of this Order:
  - i. Provide a well capacity of at least 0.6 gpm per connection at Plant 21, 15, 2 and 10, in accordance with 30 Tex. ADMIN. CODE § 290.45;
  - ii. Provide a pressure tank capacity of at least 20 gallons per connection at Plant 1B. in accordance with 30 Tex. ADMIN. CODE § 290.45:
  - iii. Provide a total storage capacity of at least 200 gallons per connection at Plant 2, in accordance with 30 Tex. ADMIN. CODE § 290.45;
  - iv. Provide two or more service pumps having a total capacity of at least 2.0 gpm per connection at Plant 17, in accordance with 30 Tex. ADMIN. CODE § 290.45;
  - v. Provide a well capacity of at least 0.6 gpm per connection for Plant 17, in accordance with 30 Tex. ADMIN. CODE § 290.45; and
  - vi. Provide a well capacity of at least 0.6 gpm per connection at Plant 5, in accordance with 30 Tex. ADMIN. CODE § 290.45.
- i. 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 Nos. 2.h.i through 2.h.vi. 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 Tyler Regional Office Texas Commission on Environmental Quality 2916 Teague Drive Tyler, Texas 75701-3734

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. 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.
- 7. 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.
- 8. 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.

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### **SIGNATURE PAGE**

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY	
For the Commission	Date
Kriote Mello-Jurach	06/16/2025
For the Executive Director	Date
I, the undersigned, have read and understand the att the attached Order, and I do agree to the terms and acknowledge that the TCEQ, in accepting payment for on such representation.	conditions specified therein. I further
I also understand that failure to comply with the Ordand/or failure to timely pay the penalty amount, ma	
<ul> <li>A negative impact on compliance history;</li> <li>Greater scrutiny of any permit applications sultanteed.</li> <li>Referral of this case to the OAG for contempt, and/or attorney fees, or to a collection agency;</li> <li>Increased penalties in any future enforcement.</li> <li>Automatic referral to the OAG of any future entorcement.</li> <li>TCEQ seeking other relief as authorized by law.</li> </ul>	injunctive relief, additional penalties, actions; iforcement actions; and
In addition, any falsification of any compliance docu	ments may result in criminal prosecution.
Signature	6-2-25
Josh Maio	Date Plasident Pusc
Name (Printed or typed) Authorized Representative of	Title
Pritchett Water Supply Corporation	

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