Order Type:

1660 Agreed Order

**Findings Order Justification:** 

N/A **Media:** PWS

**Small Business:** 

No

Location(s) Where Violation(s) Occurred:

Aero Valley Water Service, 5281 Kelly Drive, Roanoke, Denton County

**Type of Operation:** Public water supply

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** February 21, 2025

Comments Received: No

**Penalty Information** 

**Total Penalty Assessed:** \$14,550

Amount Deferred for Expedited Settlement: \$2,910

**Total Paid to General Revenue:** \$11,640

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

Payment Plan: N/A

**Compliance History Classifications:** 

Person/CN - Satisfactory

Site/RN - N/A

Major Source: Yes

Statutory Limit Adjustment: N/A

**Applicable Penalty Policy:** January 2021

**Investigation Information** 

Complaint Date(s): N/A

**Complaint Information:** N/A

Date(s) of Investigation: February 26, 2024

**Date(s) of NOE(s):** May 17, 2024

# **Violation Information**

- 1. Failed to provide a pressure tank capacity of 20 gallons per connection. Specifically, the Facility had 34 connections requiring a pressure tank capacity of 680 gallons. However, only 120 gallons of pressure tank capacity were provided, indicating an 82% deficiency [30 Tex. ADMIN. CODE § 290.45(b)(1)(B)(iv) and Tex. HEALTH & SAFETY CODE § 341.0315(c)].
- 2. Failed to provide a total storage capacity of 200 gallons per connection. Specifically, the Facility had 34 connections requiring a total storage capacity of 6,800 gallons. However, only 5,000 gallons of total storage capacity were provided, indicating an 26% deficiency [30 Tex. ADMIN. CODE § 290.45(b)(1)(B)(ii) and Tex. HEALTH & SAFETY CODE § 341.0315(c)].
- 3. Failed to provide a well capacity of 0.6 gallons per minute ("gpm") per connection. Specifically, the Facility had 34 connections requiring a well capacity of 20.4 gpm. However, only 18 gpm of well capacity was provided, indicating a 12% deficiency [30 Tex. Admin. Code § 290.45(b)(1)(B)(i) and Tex. Health & Safety Code § 341.0315(c)].
- 4. Failed to ensure that all potable water storage facilities are covered and designed, fabricated, erected, tested, and disinfected in strict accordance with current American Water Works Association ("AWWA") standards. Specifically, the Facility's ground storage tank ("GST") was made of black polyethylene material that did not meet AWWA standards [30 Tex. ADMIN. CODE § 290.43(c)].
- 5. Failed to install water transmission and distribution lines below the frost line and in no case less than 24 inches below the ground surface. Specifically, there was an unburied water line that ran through a dry creek bed at the Facility [30 Tex. ADMIN. CODE § 290.44(a)(4)].
- 6. Failed to ensure that all newly installed pipes and related products conform to the American National Standards Institute/National Sanitation Foundation ("ANSI/NSF") Standard 61 and are certified by an organization accredited by ANSI. Specifically, the unburied waterline was constructed of a material that did not conform with ANSI/NSF Standard 61 [30 Tex. Admin. Code § 290.44(a)(1)].
- 7. Failed to obtain a sanitary control easement covering land within 150 feet of the Facility's well [30 Tex. Admin. Code § 290.41(c)(1)(F)].
- 8. Failed to inspect the Facility's two pressure tanks annually [30 Tex. Admin. Code § 290.46(m)(1)(B)].
- 9. Failed to provide the GST with a liquid level indicator [30 Tex. ADMIN. CODE § 290.43(c)(4)].

# Corrective Actions/Technical Requirements

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

On February 28, 2024, the Respondent submitted copies of the exterior pressure tank inspection forms for both pressure tanks at the Facility.

# **Technical Requirements:**

The Order will require the Respondent to:

- a. Within 60 days:
- i. Replace or upgrade the Facility's storage tank to meet the current AWWA standards; and
- ii. Provide the GST with a liquid level indicator.
- b. Within 75 days, submit written certification to demonstrate compliance with a.
- c. Within 90 days:
- i. Ensure that all waterlines and distribution lines are located below the frost line and no case less than 24 inches below the ground surface;
- ii. Ensure that all pipes and related products conform to the ANSI/NSF Standard 61, including but not limited to the unburied waterline that ran through the creek at the Facility; and
- iii. Obtain a sanitary control easement that covers the land within 150 feet of the Facility's well or obtain Commission approval of an exception to the easement requirement.
- d. Within 105 days, submit written certification to demonstrate compliance with c.
- e. Within 180 days:
- i. Provide a pressure tank capacity of at least 20 gallons per connection;
- ii. Provide a total storage capacity of at least 200 gallons per connection; and
- iii. Provide a well capacity of at least 0.6 gpm per connection.
- f. Within 195 days, submit written certification to demonstrate compliance with e.

# **Contact Information**

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Emerson Rinewalt, Enforcement Division,

Enforcement Team 5, MC 219, (512) 239-1131; Michael Parrish, Enforcement Division,

MC 219, (512) 239-2548

Respondent: Josiah Cox, President, CSWR-Texas Utility Operating Company, LLC, 1600

Des Peres Road, Des Peres, Missouri 63131

Respondent's Attorney: N/A



# Penalty Calculation Worksheet (PCW)

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

DATES Assigned 20-May-2024

 Assigned
 20-May-2024

 PCW
 14-Jun-2024

 Screening
 21-May-2024

 EPA Due

RESPONDENT/FACILITY INFORMATION

Respondent CSWR-Texas Utility Operating Company, LLC

Reg. Ent. Ref. No. RN101198331

Facility/Site Region 4-Dallas/Fort Worth Major/Minor Source Major

CASE INFORMATION

Enf./Case ID No. 66054
Docket No. 2024-0960-PWS-E
Media Program(s) Public Water Supply
Multi-Media
Multi-Media
Admin. Penalty \$ Limit Minimum \$50 Maximum

No. of Violations 9
Order Type 1660
Government/Non-Profit Enf. Coordinator Emerson Rinewalt Enforcement Team 5

|         |                       |  | Penalty Ca  | alcula      | tion Section           | าท         |                 |          |
|---------|-----------------------|--|---|-------------|------------------------|------------|-----------------|----------|
| TOTA    | L BASE PENA           | ALTY (Sum of                             | violation base  |             |                        | J11        | Subtotal 1      | \$15,300 |
| ADJU    | STMENTS (+            | /-) TO SUBT                              | OTAL 1 g the Total Base Penalty                                   | (Subtotal 1 | ) by the indicated n   | ercentage  |                 |          |
|         | Compliance Hi         | , , ,                                    | g the Total Base Femaley  | 0.0%        | Adjustment             |            | otals 2, 3, & 7 | \$0      |
|         | Notes                 |  | tion for one notice of<br>f violations is below<br>(Subtotal 2) d | zero, the   | e Adjustment Pe        |            |                 |          |
|         | Culpability           | No                                       |   | 0.0%        | Enhancement            |            | Subtotal 4      | \$0      |
|         | Notes                 | The Re                                   | spondent does not   | meet the    | culpability crite      | ria.       |                 |          |
|         | Good Faith Eff        | ort to Comply 1                          | otal Adjustments  |             |                        |            | Subtotal 5      | -\$750   |
|         |                       |  |   |             |                        |            |                 | -        |
|         | Economic Ben          |  |   |             | Enhancement*           |            | Subtotal 6      | \$0      |
|         | Estimated             | Total EB Amounts<br>I Cost of Compliance | \$2,458<br>\$22,677   | *Сарре      | d at the Total EB \$ A | Amount     |                 |          |
| SUM     | OF SUBTOTA            | LS 1-7                                   |   |             |                        | 1          | Final Subtotal  | \$14,550 |
|         | R FACTORS A           |  | 1AY REQUIRE cated percentage.                                     |             | 0.0%                   |            | Adjustment      | \$0      |
|         | Notes                 |  |   |             |                        |            |                 |          |
|         |                       |  |   |             |                        | Final Pe   | nalty Amount    | \$14,550 |
| STAT    | UTORY LIMI            | T ADJUSTME                               | NT  |             |                        | Final Asse | essed Penalty   | \$14,550 |
|         | RRAL                  |  |   |             | 20.0%                  | Reduction  | Adjustment      | -\$2,910 |
| Reduces | the Final Assessed Pe | enalty by the indicate                   | d percentage.   |             |                        |            |                 |          |
|         | Notes                 |  | Deferral offered for  | expedite    | d settlement.          |            |                 |          |
| ΡΔΥΔ    | BLE PENALT            | Υ  |   |             |                        |            |                 | \$11,640 |
|         |                       | -  |   |             |                        |            |                 | +==,     |

**PCW** 

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

Respondent CSWR-Texas Utility Operating Company, LLC

**Case ID No.** 66054

Reg. Ent. Reference No. RN101198331

>>

Media Public Water Supply

Enf. Coordinator Emerson Rinewalt

| omponent              | Number of  | Number | Adjust. |
|-----------------------|--|--------|---------|
| NOVs                  | Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)   | 0      | 0%      |
|                       | Other written NOVs   | 0      | 0%      |
|                       | Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)   | 0      | 0%      |
| Orders                | Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission | 0      | 0%      |
| Judgments             | Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)  | 0      | 0%      |
| nd Consent<br>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%      |
| 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)              | 1      | -1%     |
| Audits                | Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)   | 1      | -2%     |
|                       | 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%      |
| 30101                 | Participation in a voluntary pollution reduction program   | No     | 0%      |
|                       | Early compliance with, or offer of a product that meets future state or federal government environmental requirements  | No     | 0%      |

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

N/A

Adjustment Percentage (Subtotal 3)

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Since the reduction for one notice of intent to conduct an audit and one disclosure of violations is below zero, the Adjustment Percentage (Subtotal 2) defaults to zero.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage \*capped at 100%

0%

|          | Screen         | ing Date     | 21-May-2024  |                                  | Doc                              | ket No. 2024-0  | )960-PWS-E         |           | PCW                         |
|----------|----------------|--------------|--|----------------------------------|----------------------------------|---|--------------------|-----------|-----------------------------|
|          |                | •            | CSWR-Texas U   | Itility Operatir                 | ng Company,                      | LLC   |                    | Policy Re | vision 5 (January 28, 2021) |
|          |                | se ID No.    |  |                                  |                                  |   |                    | PCW       | Revision February 11, 2021  |
| Reg.     | Ent. Refer     |              | RN101198331  |                                  |                                  |   |                    |           |                             |
|          |                |              | Public Water St  |                                  |                                  |   |                    |           |                             |
|          |                |              | Emerson Rinew  | valt<br>ī                        |                                  |   |                    |           |                             |
|          |                | on Number    | 1  |                                  |                                  |   |                    |           |                             |
|          | R              | ule Cite(s)  | 30 Tex. Adm  | nin. Code § 29                   | 90.45(b)(1)(B<br>341.03          | B)(iv) and Tex. Head<br>B15(c)  | alth & Safety Co   | de §      |                             |
|          | Violation D    | escription   | Specifically, th   | ne Facility had<br>lowever, only | l 34 connection<br>120 gallons o | pacity of 20 gallor<br>ons requiring a pre<br>of pressure tank co<br>2% deficiency. | essure tank capa   | city of   |                             |
|          |                |              |  |                                  |                                  |   | Base P             | enalty    | \$5,000                     |
| >> Env   | vironmenta     | al, Propei   | ty and Hum   | an Health                        | Matrix                           |   |                    |           |                             |
|          |                | _            | <del>-</del>   | Harm                             |                                  |   |                    |           |                             |
|          |                | Release      | Major  | Moderate                         | Minor                            |   |                    |           |                             |
| OR       |                | Actual       |  |                                  |                                  | _   |                    |           |                             |
|          |                | Potential    | X  |                                  |                                  | Percei  | nt 30.0%           |           |                             |
| >> Droc  | arammatic      | Matrix       |  |                                  |                                  |   |                    |           |                             |
| >>Prog   | grammatio<br>F | alsification | Major  | Moderate                         | Minor                            |   |                    |           |                             |
|          | _              | aisirication | Major  | Hoderate                         | 1-111101                         | Percei  | nt 0.0%            |           |                             |
|          | <u> </u>       |              |  |                                  |                                  |   | 0.070              |           |                             |
|          |                |              |  |                                  |                                  |   |                    |           |                             |
|          |                | •            |  | •                                |                                  | ld expose persons   | •                  | acility   |                             |
|          | Notes          | to           | contaminants   | which would                      | exceed levels                    | protective of hum   | nan health.        |           |                             |
|          | _              |              |  |                                  |                                  |   |                    |           |                             |
|          |                |              |  |                                  |                                  | Adjustme  | nt                 | \$3,500   |                             |
|          |                |              |  |                                  |                                  | -   | •                  |           |                             |
|          |                |              |  |                                  |                                  |   |                    | L         | \$1,500                     |
| Violetia | on Events      |              |  |                                  |                                  |   |                    |           |                             |
| violatio | on Events      |              |  |                                  |                                  |   |                    |           |                             |
|          | ı              | Number of V  | iolation Events  | 3                                | 1 [                              | 85 Numbe  | er of violation da | vs        |                             |
|          |                |              |  |                                  | <u> </u>                         | 03  |                    | , -       |                             |
|          |                |              | daily  |                                  | ]                                |   |                    |           |                             |
|          |                |              | weekly   |                                  |                                  |   |                    |           |                             |
|          |                |              | monthly  | Х                                |                                  |   |                    | _         |                             |
|          |                |              | quarterly  |                                  |                                  | Vi  | iolation Base P    | enalty    | \$4,500                     |
|          |                |              | semiannual   |                                  |                                  |   |                    |           |                             |
|          |                |              | annual   |                                  |                                  |   |                    |           |                             |
|          |                |              | single event   |                                  |                                  |   |                    |           |                             |
|          |                |              |  |                                  |                                  |   |                    |           |                             |
|          | Т              | hree month   |  |                                  |                                  | om the February 2   | 26, 2024 investi   | gation    |                             |
|          |                |              | da   | ate to the May                   | y 21, 2024 sc                    | reening date.   |                    |           |                             |
|          |                |              |  |                                  |                                  |   |                    |           |                             |
| Good F   | aith Effort    | s to Com     | ply  | 0.0%                             |                                  |   | Red                | duction   | \$0                         |
|          |                |              | The state of the s | Before NOE/NOV                   | NOE/NOV to ED                    | PRP/Settlement Offer  |                    | ·         |                             |
|          |                |              | Extraordinary  |                                  |                                  |   |                    |           |                             |
|          |                |              | Ordinary   |                                  |                                  |   |                    |           |                             |
|          |                |              | N/A  | X                                |                                  |   |                    |           |                             |
|          |                |              |  | The Respon                       | dent does no                     | t meet the good fa  | aith criteria      |           |                             |
|          |                |              | Notes  |                                  |                                  | s violation.  |                    |           |                             |
|          |                |              |  |                                  |                                  |   |                    |           |                             |
|          |                |              |  |                                  |                                  |   | Violation Su       | htotal    | <i>+1</i> E00               |
| Fase     | mia Dana Cit   | L (ED) C     | Albin odoloti  |                                  |                                  | 01-7  |                    | _         | \$4,500                     |
| conon    | ilic Benefit   | r (ER) to    | this violation   | UΠ                               |                                  | Statu   | itory Limit To     | est       |                             |
|          |                | Estimate     | ed EB Amount   |                                  | \$604                            | Violatio  | n Final Penalty    | / Total   | \$4,500                     |
|          |                |              |  | This viola                       | tion Final A                     | ssessed Penalty   | (adjusted for      | imits)    | \$4,500                     |
|          |                |              |  | 5510                             |                                  | see - charty  | (22)22102 101 1    |           | φ 1,500                     |

|   | E              | conomic             | Benefit          | Wor        | <b>'ksheet</b>     |                       |              |
|---|----------------|---------------------|------------------|------------|--------------------|-----------------------|--------------|
| Respondent                                | CSWR-Texas l   | Jtility Operating C | Company, LLC     |            |                    |                       |              |
| Case ID No.                               | 66054          |                     |                  |            |                    |                       |              |
| Reg. Ent. Reference No.                   |                |                     |                  |            |                    |                       |              |
|   | Public Water S |                     |                  |            |                    |                       | Years of     |
| Violation No.                             |                | арргу               |                  |            |                    | Percent Interest      | Depreciation |
| Violation No.                             | -              |                     |                  |            |                    | 5.0                   | 15           |
|   | Item Cost      | Date Required       | Final Date       | Yrs        | Interest Saved     | Costs Saved           | EB Amount    |
| Item Description                          |                |                     |                  |            |                    |                       |              |
|   |                |                     |                  |            |                    |                       |              |
| Delayed Costs                             |                |                     |                  |            |                    |                       |              |
| Equipment                                 |                |                     |                  | 0.00       | \$0                | \$0                   | \$0          |
| Buildings                                 |                |                     |                  | 0.00       | \$0                | \$0                   | \$0          |
| Other (as needed)                         |                |                     |                  | 0.00       | \$0                | \$0                   | \$0          |
| Engineering/Construction                  | \$5,000        | 26-Feb-2024         | 17-Nov-2025      | 1.73       | \$29               | \$575                 | \$604        |
| 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                   | per conn       | ection, calculated  | from the date of | of the inv | vestigation to the | ank capacity of at le | ompliance.   |
| 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<br>\$0         | \$0<br>\$0            | \$0<br>\$0   |
| Supplies/Equipment<br>Financial Assurance |                |                     |                  | 0.00       | \$0<br>\$0         | \$0                   | \$0          |
| ONE-TIME avoided costs                    |                |                     |                  | 0.00       | \$0                | \$0                   | \$0<br>\$0   |
| Other (as needed)                         |                |                     |                  | 0.00       | \$0                | \$0                   | \$0          |
| Notes for AVOIDED costs                   |                |                     |                  | 1 0.00     | <u>, 30</u>        | 1 20                  | ΦU           |
| Approx. Cost of Compliance                |                | \$5,000             |                  |            | TOTAL              |                       | \$604        |

|                             | <b>Date</b> 21-May-202   |  |  | <b>t No.</b> 2024-0960-PWS-E  |   | PCW                      |
|-----------------------------|--|--|--|---|---|--------------------------|
| Respo                       | ndent CSWR-Texa  | as Utility Operating   | Company, LLC   |   | Policy Revisi                                 | ion 5 (January 28, 2021) |
| Case 1                      | <b>ID No.</b> 66054  |  |  |   | PCW Rev                                       | vision February 11, 2021 |
| Reg. Ent. Referen           | ce No. RN1011983   | 331  |  |   |   |                          |
|                             | Media Public Wate  |  |  |   |   |                          |
|                             | inator Emerson Ri  |  |  |   |   |                          |
| Violation N                 |  |  |  |   |   |                          |
|                             |  | Admin Code S 2   | 00 45(h)(1)(B)(ii  | ) and Tex. Health & Safety Co   | ndo S   |                          |
| Kaie                        | 50 Tex   | . Admin. Code 9 2  | 341.0315   |   | ode g   |                          |
|                             |  |  | 341.0313(  |   |   |                          |
|                             | Failed to pu   | rovido o total atom  | an conneity of 30  | O callons nor connection. Co  | o cifically                                   |                          |
|                             | the Facility   |  |  | 00 gallons per connection. Sp<br>tal storage capacity of 6,800  |   |                          |
| Violation Desc              |  |  |  | capacity were provided, indic   |   |                          |
|                             | However,   | only 5,000 gallons   | 26% deficie  |   | acing an                                      |                          |
|                             |  |  |  |   |   |                          |
|                             |  |  |  |   |   |                          |
|                             |  |  |  | Base  | Penalty                                       | \$5,000                  |
|                             | _  |  |  |   |   |                          |
| >> Environmental,           | Property and H   |  | Matrix   |   |   |                          |
| _                           | Delenge Major  | Harm   | Minor  |   |   |                          |
| OR                          | Release Major Actual   | Moderate   | Minor  |   |   |                          |
|                             | Potential  |  |  | Percent 15.0%   |   |                          |
|                             | otential   | X  |  | Percent 15.0%   |   |                          |
| >>Programmatic M            | atriv  |  |  |   |   |                          |
|                             | fication Major   | Moderate   | Minor  |   |   |                          |
| Taisi                       | neation Major  | Hoderate   | MINO   | Percent 0.0%  |   |                          |
|                             |  |  |  | 0.070   |   |                          |
| Failu                       | ro to provide adequa   | eto total storago si   | pacity could rec   | ılt in water outages and low i  | araccura                                      |                          |
| Matrix                      |  |  | . ,  | ficant amount of contaminan   |   |                          |
| Notes                       |  | ould not exceed lev  | , -  |   | es willen                                     |                          |
|                             |  |  |  |   |   |                          |
|                             |  |  |  | Adjustment  | \$4,250                                       |                          |
|                             |  |  |  | , and a second  | ψ.,,230                                       |                          |
| I .                         |  |  |  |   | 1   | \$750                    |
|                             |  |  |  |   |   | \$7.50                   |
|                             |  |  |  |   |   | \$750                    |
| Violation Events            |  |  |  |   |   | \$750                    |
|                             |  |  |  | 1   |   | 0.5 د د                  |
|                             | nber of Violation Eve  | ents 1   |  | 85 Number of violation o  | lays  | <b>\$730</b>             |
|                             |  | ents 1   |  | 85 Number of violation o  | days  | \$730                    |
|                             | daily  |  |  | 85 Number of violation o  | days  | \$730                    |
|                             | daily<br>weekly  |  |  | 85 Number of violation o  | days  | \$730                    |
|                             | daily<br>weekly<br>monthly   | ,  |  |   | <u></u>                                       | ·                        |
|                             | daily<br>weekly<br>monthly<br>quarterly  |  |  | Number of violation of Violation of Violation Base  | <u></u>                                       | \$750                    |
|                             | daily<br>weekly<br>monthly<br>quarterly<br>semiannu  |  |  |   | <u></u>                                       | ·                        |
|                             | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual  | / X  |  |   | <u></u>                                       | ·                        |
|                             | daily<br>weekly<br>monthly<br>quarterly<br>semiannu  | / X  |  |   | <u></u>                                       | ·                        |
| Nur                         | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual<br>single eve  | / X al   |  | Violation Base  | Penalty                                       | ·                        |
| Nur                         | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual<br>single eve  | x al   | lated from the Fe  | Violation Base  | Penalty                                       | ·                        |
| Nur                         | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual<br>single eve  | x al   |  | Violation Base  | Penalty                                       | ·                        |
| Nur                         | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual<br>single eve  | x al   | lated from the Fe  | Violation Base  | Penalty                                       | ·                        |
| Nur                         | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual<br>single eve  | x al   | lated from the Fe  | Violation Base<br>bruary 26, 2024 investigatio<br>date.   | Penalty                                       | ·                        |
| One o                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual<br>single eve  | x x all  | lated from the Fe  | Violation Base<br>bruary 26, 2024 investigatio<br>date.   | Penalty                                       | \$750                    |
| One o                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannu<br>annual<br>single eve  | x x al   | lated from the Fe<br>, 2024 screening  | Violation Base<br>bruary 26, 2024 investigatio<br>date.   | Penalty                                       | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve  | x x al   | lated from the Fe<br>, 2024 screening  | Violation Base<br>bruary 26, 2024 investigatio<br>date.   | Penalty                                       | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve quarterly event is rec co Comply  Extraordin Ordin                               | x x al   | lated from the Fe<br>, 2024 screening  | Violation Base<br>bruary 26, 2024 investigatio<br>date.   | Penalty                                       | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve quarterly event is rec co Comply  Extraordin Ordin                               | nt x al more more more more more more more more  | lated from the Fe, 2024 screening  | Violation Base<br>bruary 26, 2024 investigatio<br>date.   | Penalty                                       | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve quarterly event is rec co Comply  Extraordin Ordin                               | nt x al more more more more more more more more  | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/                             | Violation Base bruary 26, 2024 investigatio date.  Settlement Offer t the good faith criteria for   | Penalty                                       | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve quarterly event is rec co Comply  Extraordin Ordin                               | commended, calcuthe May 21  0.0% Before NOE/NOV ary ary N/A x  The Responder                                 | lated from the Fe, 2024 screening  | Violation Base bruary 26, 2024 investigatio date.  Settlement Offer t the good faith criteria for   | Penalty                                       | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve quarterly event is rec co Comply  Extraordin Ordin                               | commended, calcuthe May 21  0.0% Before NOE/NOV ary ary N/A x  The Responder                                 | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/                             | Violation Base  bruary 26, 2024 investigatio date.  Settlement Offer  t the good faith criteria for tion.   | n date to                                     | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve quarterly event is rec co Comply  Extraordin Ordin                               | commended, calcuthe May 21  0.0% Before NOE/NOV ary ary N/A x  The Responder                                 | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/                             | Violation Base bruary 26, 2024 investigatio date.  Settlement Offer t the good faith criteria for   | n date to                                     | \$750                    |
| One of Good Faith Efforts t | daily weekly monthly quarterly semiannu annual single eve  quarterly event is rec co Comply  Extraordin Ordin                              | al   | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/                             | Violation Base bruary 26, 2024 investigatio date.  Settlement Offer t the good faith criteria for tion.  Violation  | n date to Reduction                           | \$750                    |
| One o                       | daily weekly monthly quarterly semiannu annual single eve  quarterly event is rec co Comply  Extraordin Ordin                              | al   | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/                             | Violation Base  bruary 26, 2024 investigatio date.  Settlement Offer  t the good faith criteria for tion.   | n date to Reduction                           | \$750                    |
| Good Faith Efforts t        | daily weekly monthly quarterly semiannu annual single eve  quarterly event is rec co Comply  Extraordin Ordin                              | ation  X X X X X X X X X X X X X X X X X X   | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/                             | Violation Base bruary 26, 2024 investigatio date.  Settlement Offer t the good faith criteria for tion.  Violation  | n date to Reduction Subtotal                  | \$750                    |
| Good Faith Efforts t        | daily weekly monthly quarterly semiannu annual single eve  quarterly event is rec  to Comply  Extraordin  Ordin  No  No  EB) for this viol | with a special commended, calculated the May 21  0.0%  Before NOE/NOV  ary  N/A x  The Responded  ation  unt | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/ ent does not mee this viola | Violation Base  bruary 26, 2024 investigatio date.  Settlement Offer  t the good faith criteria for tion.  Violation  Statutory Limit  Violation Final Pena | Penalty  n date to  Reduction  Subtotal  Test | \$750<br>\$750<br>\$750  |
| Good Faith Efforts t        | daily weekly monthly quarterly semiannu annual single eve  quarterly event is rec  to Comply  Extraordin  Ordin  No  No  EB) for this viol | with a special commended, calculated the May 21  0.0%  Before NOE/NOV  ary  N/A x  The Responded  ation  unt | lated from the Fe, 2024 screening  NOE/NOV to EDPRP/ ent does not mee this viola | Violation Base bruary 26, 2024 investigatio date.  Settlement Offer t the good faith criteria for tion.  Violation  Statutory Limit                         | Penalty  n date to  Reduction  Subtotal  Test | \$750<br>\$0<br>\$750    |

|  | E              | conomic             | Benefit                      | Wor        | rksheet                           |   |                       |
|--|----------------|---------------------|------------------------------|------------|-----------------------------------|---|-----------------------|
| Respondent                                 | CSWR-Texas I   | Jtility Operating C | ompany, LLC                  |            |                                   |   |                       |
| Case ID No.                                |                | , .                 | . ,,                         |            |                                   |   |                       |
| Reg. Ent. Reference No.                    | RN101198331    |                     |                              |            |                                   |   |                       |
|  | 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                           |                |                     |                              |            |                                   |   |                       |
| Item Description                           |                |                     |                              |            |                                   |   |                       |
| Delayed Costs                              |                |                     |                              |            |                                   |   |                       |
| Equipment                                  |                |                     |                              | 0.00       | \$0                               | \$0   | \$0                   |
| Buildings                                  |                |                     |                              | 0.00       | \$0                               | \$0   | \$0                   |
| Other (as needed)                          | \$3,870        | 26-Feb-2024         | 17-Nov-2025                  | 1.73       | \$22                              | \$445   | \$467                 |
| 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                    | per connec     | tion (\$2.15 per ga | allon x 1,800 ga<br>estimate | illons), c | alculated from the of compliance. | ge capacity of at lea<br>date of the investig | gation to the         |
| 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                         |                |                     |                              | 0.00       | \$0                               | \$0   | \$0                   |
| Financial Assurance                        |                |                     |                              | 0.00       | \$0                               | \$0   | \$0                   |
| ONE-TIME avoided costs                     |                |                     |                              | 0.00       | \$0                               | \$0   | \$0                   |
| Other (as needed)  Notes for AVOIDED costs |                | JL J                |                              | 0.00       | \$0                               | \$0   | \$0                   |
| Approx. Cost of Compliance                 |                | \$3,870             |                              |            | TOTAL                             |   | \$467                 |

|         | Screening Date        |  |                           | <b>0.</b> 2024-0960-PWS-E    | PCW                                  |
|---------|-----------------------|--|---------------------------|------------------------------|--------------------------------------|
|         | Respondent            | CSWR-Texas Utility Operati                                   | ing Company, LLC          |                              | Policy Revision 5 (January 28, 2021) |
|         | Case ID No.           |  |                           |                              | PCW Revision February 11, 2021       |
| Reg.    | Ent. Reference No.    |  |                           |                              |                                      |
|         |                       | Public Water Supply  |                           |                              |                                      |
|         | Enf. Coordinator      |  |                           |                              |                                      |
|         | Violation Number      |  | 200 4F(h)(1)(B)(i)        | Tarrible O. Cafaba Car       | I. C.                                |
|         | Rule Cite(s)          | 30 Tex. Admin. Code 9  | 341.0315(c)               | Tex. Health & Safety Coo     | ie §                                 |
|         |                       |  | 341.0313(C)               |                              |                                      |
|         |                       | F 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1                       |                           |                              |                                      |
|         | Violation Description | Failed to provide a well ca<br>Specifically, the Facility ha |                           |                              |                                      |
|         | Violation Description | However, only 18 gpm of                                      |                           | , ,                          | 31                                   |
|         |                       |  | The capacity mas prome    | ,                            | 3.6.1.6,1.                           |
|         |                       |  |                           |                              |                                      |
|         |                       |  |                           | Race                         | Penalty \$5,000                      |
|         |                       |  |                           | Dase                         | \$5,000                              |
| >> Env  | vironmental, Prope    | rty and Human Healt  | h Matrix                  |                              |                                      |
|         |                       | Harm   |                           |                              |                                      |
| OR      | Release               | Major Moderate   | Minor                     |                              |                                      |
| UK      | Actual<br>Potential   |  |                           | Percent 15.0%                |                                      |
|         | Potential             | Х  |                           | <b>Percent</b> 15.0%         |                                      |
| >>Pro   | grammatic Matrix      |  |                           |                              |                                      |
|         | Falsification         | Major Moderate   | Minor                     |                              |                                      |
|         |                       |  |                           | Percent 0.0%                 |                                      |
|         |                       |  |                           |                              |                                      |
|         | Matrix Failure to     | provide adequate well capa                                   | acity could avnose nerso  | ns served by the Facility t  | 0.3                                  |
|         |                       | mount of contaminants whi                                    |                           |                              |                                      |
|         |                       |  |                           | F                            |                                      |
|         |                       |  |                           | A diverse and                | ¢4.250                               |
|         |                       |  |                           | Adjustment                   | \$4,250                              |
|         |                       |  |                           |                              | \$750                                |
|         |                       |  |                           |                              |                                      |
| Violati | on Events             |  |                           |                              |                                      |
|         | Number of \           | /iolation Events 1   | 85                        | Number of violation da       | avs                                  |
|         |                       | 1  |                           |                              | .,,,                                 |
|         |                       | daily  |                           |                              |                                      |
|         |                       | weekly   |                           |                              |                                      |
|         |                       | monthly  |                           |                              |                                      |
|         |                       | quarterly x  |                           | Violation Base               | Penalty \$750                        |
|         |                       | semiannual   |                           |                              |                                      |
|         |                       | annual   |                           |                              |                                      |
|         |                       | single event   |                           |                              |                                      |
|         |                       |  |                           |                              |                                      |
|         | One quarterly         | event is recommended, cal                                    |                           |                              | date to                              |
|         |                       | the May 2  | 21, 2024 screening date   |                              |                                      |
| _       |                       |  |                           |                              |                                      |
| Good F  | aith Efforts to Com   | Ply 0.0%  Before NOE/NOV                                     |                           |                              | eduction \$0                         |
|         |                       | Extraordinary Extra  | V NOE/NOV to EDPRP/Settle | ement Offer                  |                                      |
|         |                       |  |                           |                              |                                      |
|         |                       | Ordinary   |                           |                              |                                      |
|         |                       | N/A x  |                           |                              |                                      |
|         |                       | Notes The Respor   | ndent does not meet the   |                              |                                      |
|         |                       | 110103   | this violation.           |                              |                                      |
|         |                       |  |                           |                              |                                      |
|         |                       |  |                           | Violation S                  | ubtotal \$750                        |
| Econor  | mic Bonofit (ED) for  | thic violation   |                           | Chatutani Limit 3            | Toot                                 |
| ECONOR  | mic Benefit (EB) for  | uns violation  |                           | Statutory Limit              | est                                  |
|         | Estimate              | ed EB Amount   | \$604                     | <b>Violation Final Penal</b> | ty Total \$750                       |
|         |                       |  |                           |                              | -                                    |
|         |                       | This vi  | iolation Final Assesse    | d Penalty (adjusted for      | 'limits) \$750                       |

| Economic Benefit Worksheet    |                |                     |                  |          |                   |  |                       |  |  |  |  |
|-------------------------------|----------------|---------------------|------------------|----------|-------------------|--|-----------------------|--|--|--|--|
| Respondent                    | CSWR-Texas l   | Utility Operating C | ompany, LLC      |          |                   |  |                       |  |  |  |  |
| Case ID No.                   | 66054          |                     |                  |          |                   |  |                       |  |  |  |  |
| Reg. Ent. Reference No.       | RN101198331    |                     |                  |          |                   |  |                       |  |  |  |  |
|                               | 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              |                | •                   |                  |          |                   |  |                       |  |  |  |  |
| 200 2 000 paid                |                |                     |                  |          |                   |  |                       |  |  |  |  |
| Delayed Costs                 |                |                     |                  |          |                   |  |                       |  |  |  |  |
| Equipment                     |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Buildings                     |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Other (as needed)             | \$5,000        | 26-Feb-2024         | 17-Nov-2025      | 1.73     | \$29              | \$575  | \$604                 |  |  |  |  |
| 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       | con            | nection, calculate  | d from the inves | tigation | date to the estim | pacity of at least 0.<br>ated date of compli | ance.                 |  |  |  |  |
| Avoided Costs                 | ANNU           | ALIZE avoided o     | osts before en   |          |                   | one-time avoided                             |                       |  |  |  |  |
| Disposal                      |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Personnel                     |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Inspection/Reporting/Sampling |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Supplies/Equipment            |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Financial Assurance           |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| ONE-TIME avoided costs        |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Other (as needed)             |                |                     |                  | 0.00     | \$0               | \$0  | \$0                   |  |  |  |  |
| Notes for AVOIDED costs       |                |                     |                  |          |                   |  |                       |  |  |  |  |
| Approx. Cost of Compliance    |                | \$5,000             |                  |          | TOTAL             |  | \$604                 |  |  |  |  |

|                 |           | ening Date               |                                  |                 |                   | et No. 2024-0960-PWS-E   |                 | PCW                  |
|-----------------|-----------|--------------------------|----------------------------------|-----------------|-------------------|--|-----------------|----------------------|
|                 |           | •                        |                                  | tility Operatin | g Company, LLC    |  | Policy Revision | 5 (January 28, 2021) |
|                 | _         | ase ID No.               |                                  |                 |                   |  | PCW Revision    | on February 11, 2021 |
| Reg. I          | Ent. Kef  |                          | RN101198331                      |                 |                   |  |                 |                      |
|                 | Enf C     |                          | Public Water St<br>Emerson Rinew |                 |                   |  |                 |                      |
|                 |           | tion Number              | 4                                | /ail            |                   |  |                 |                      |
|                 | VIOIE     | Rule Cite(s)             | -                                |                 |                   |  |                 |                      |
|                 |           |                          |                                  | 30              | Tex. Admin. Coo   | le § 290.43(c)   |                 |                      |
|                 |           |                          | Failed be seen                   |                 |                   |  | -:d             |                      |
|                 |           |                          |                                  |                 |                   | ge facilities are covered and de-<br>ed in strict accordance with curr |                 |                      |
|                 | Violatio  | n Description            |                                  |                 |                   | ") standards. Specifically, the F                                      |                 |                      |
|                 |           | -                        |                                  |                 |                   | lack polyethylene material that  |                 |                      |
|                 |           |                          |                                  |                 | meet AWWA s       | tandards.  |                 |                      |
|                 |           | ı                        |                                  |                 |                   |  |                 |                      |
|                 |           |                          |                                  |                 |                   | Base   | Penalty         | \$5,000              |
| >> Env          | rironmei  | ntal, Propei             | rty and Hum                      | nan Health      | Matrix            |  |                 |                      |
|                 |           |                          | <del>-</del>                     | Harm            |                   |  |                 |                      |
| OR              |           | <b>Release</b><br>Actual | Major                            | Moderate        | Minor             |  |                 |                      |
| OK              |           | Potential                |                                  | Х               |                   | Percent 15.0%  |                 |                      |
|                 |           | rotential                |                                  |                 |                   | 15.0 %   |                 |                      |
| >>Prog          | gramma    | tic Matrix               |                                  |                 |                   |  |                 |                      |
|                 |           | Falsification            | Major                            | Moderate        | Minor             |  |                 |                      |
|                 |           |                          |                                  |                 |                   | Percent 0.0%   |                 |                      |
|                 |           |                          |                                  |                 |                   |  |                 |                      |
|                 | Matrix    |                          | •                                |                 |                   | perly constructed could expose<br>nants which would not exceed le      | •               |                      |
|                 | Notes     | served by t              | the racility to a                |                 | ve of human hea   |  | eveis           |                      |
|                 | L         |                          |                                  |                 |                   | <u> </u>   |                 |                      |
|                 |           |                          |                                  |                 |                   | Adjustment   | \$4,250         |                      |
|                 |           |                          |                                  |                 |                   |  |                 | \$750                |
|                 |           |                          |                                  |                 |                   |  |                 | Ψ7.50                |
| <b>Violatio</b> | on Event  | :s                       |                                  |                 |                   |  |                 |                      |
|                 |           | Ni. mala a u a f N       | /ialatian Frants                 | 4               |                   | OF Number of violation de  |                 |                      |
|                 |           | number of v              | iolation Events                  | 1               |                   | 85 Number of violation da  | iys             |                      |
|                 |           |                          | daily                            |                 |                   |  |                 |                      |
|                 |           |                          | weekly                           |                 |                   |  |                 |                      |
|                 |           |                          | monthly                          |                 |                   |  |                 |                      |
|                 |           |                          | quarterly                        | X               |                   | Violation Base   | Penalty         | \$750                |
|                 |           |                          | semiannual                       |                 |                   |  |                 |                      |
|                 |           |                          | annual<br>single event           |                 |                   |  |                 |                      |
|                 |           |                          | Single event                     |                 | I                 |  |                 |                      |
|                 |           | One quarterly            | event is recom                   | mended calcu    | ilated from the I | ebruary 26, 2024 investigation   | date to         |                      |
|                 |           | one quarterly            |                                  |                 | ., 2024 screenin  |  |                 |                      |
|                 | l         |                          |                                  |                 |                   |  |                 |                      |
| Good Fa         | aith Effo | rts to Com               | ply                              | 0.0%            |                   | Re   | eduction        | \$0                  |
|                 |           |                          |                                  | Before NOE/NOV  | NOE/NOV to EDPR   | P/Settlement Offer   |                 |                      |
|                 |           |                          | Extraordinary                    |                 |                   |  |                 |                      |
|                 |           |                          | Ordinary                         |                 |                   |  |                 |                      |
|                 |           |                          | N/A                              | X               |                   |  |                 |                      |
|                 |           |                          | Notes                            | The Respond     |                   | eet the good faith criteria for  |                 |                      |
|                 |           |                          | Notes                            |                 | this vio          | lation.  |                 |                      |
|                 |           |                          | !                                |                 |                   |  |                 |                      |
|                 |           |                          |                                  |                 |                   | Violation S  | ubtotal         | \$750                |
| Econom          | nic Bene  | fit (EB) for             | this violation                   | on              |                   | Statutory Limit 1  | Test .          |                      |
|                 |           | Estimate                 | ed EB Amount                     |                 | \$489             | Violation Final Penal  | ty Total        | \$750                |
|                 |           | _5ac                     |                                  |                 |                   |  |                 | ·                    |
|                 |           |                          |                                  | This vio        | lation Final As   | sessed Penalty (adjusted for   | limits)         | \$750                |
|                 |           |                          |                                  |                 |                   |  |                 |                      |

|  | E              | conomic             | Benefit          | Wor       | <b>'ksheet</b>      |  |                       |
|--|----------------|---------------------|------------------|-----------|---------------------|--|-----------------------|
| Respondent                             | CSWR-Texas     | Jtility Operating C | ompany, LLC      |           |                     |  |                       |
| 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                       |                |                     |                  |           |                     |  |                       |
| Item Description                       |                |                     |                  |           |                     |  |                       |
| Delayed Costs                          |                |                     |                  |           |                     |  |                       |
| Equipment                              | \$5,000        | 26-Feb-2024         | 20-Jul-2025      | 1.40      | \$23                | \$466  | \$489                 |
| Buildings                              | \$5,000        | 20-1 60-2024        | 20-301-2023      | 0.00      | \$0                 | \$400  | \$0                   |
| Other (as needed)                      |                |                     |                  | 0.00      | \$0                 | \$0  | \$0                   |
| Engineering/Construction               |                |                     |                  | 0.00      | \$0                 | \$0  | \$0                   |
| Land                                   |                |                     |                  | 0.00      | \$0                 | n/a  | \$0                   |
| Record Keeping System                  |                |                     |                  | 0.00      | \$0                 | n/a  | \$0                   |
| Training/Sampling                      |                |                     |                  | 0.00      | \$0                 | n/a  | \$0                   |
| Remediation/Disposal                   |                |                     |                  | 0.00      | \$0                 | n/a  | \$0                   |
| Permit Costs                           |                |                     |                  | 0.00      | \$0                 | n/a  | \$0                   |
| Other (as needed)                      |                |                     |                  | 0.00      | \$0                 | n/a  | \$0                   |
| Notes for DELAYED costs  Avoided Costs | current AWW    | A standards, calcu  | lated from the o | date of t | he investigation to | the Facility's storage<br>the estimated date | of compliance.        |
| 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<br>\$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               |  | \$489                 |

|          |                 | ening Date               |                         |                  |                  | <b>cet No.</b> 2024-0960-PWS-E  |                   | PCW                 |
|----------|-----------------|--------------------------|-------------------------|------------------|------------------|---|-------------------|---------------------|
|          | R               | Respondent               | CSWR-Texas U            | tility Operating | g Company, LLC   |   | Policy Revision 5 | (January 28, 2021)  |
|          |                 | Case ID No.              |                         |                  |                  |   | PCW Revision      | February 11, 2021   |
| Reg.     | Ent. Ref        | erence No.               |                         |                  |                  |   |                   |                     |
|          |                 |                          | Public Water Su         |                  |                  |   |                   |                     |
|          |                 |                          | Emerson Rinew           | ≀alt<br>ī        |                  |   |                   |                     |
|          | Viola           | ation Number             | 5                       |                  |                  |   |                   |                     |
|          |                 | Rule Cite(s)             |                         | 30 Te            | ex. Admin. Code  | e § 290.44(a)(4)  |                   |                     |
|          |                 |                          |                         |                  |                  |   |                   |                     |
|          |                 |                          |                         |                  |                  |   |                   |                     |
|          | Violatio        | n Description            |                         |                  |                  | ribution lines below the frost line<br>and surface. Specifically, there v |                   |                     |
|          | Violatio        | ii Description           |                         |                  |                  | and surface. Specifically, there very a dry creek bed at the Facility.    | vas ali           |                     |
|          |                 |                          |                         |                  |                  | ,   |                   |                     |
|          |                 |                          |                         |                  |                  |   |                   |                     |
|          |                 |                          |                         |                  |                  | Base  | Penalty           | \$5,000             |
| >> En:   | vironmo         | ntal Drama               | why and Union           | an Haalth        | Matrix           |   |                   |                     |
| // EIIV  | viioiiiie       | iitai, Propei            | rty and Hum             | Harm             | Matrix           |   |                   |                     |
|          |                 | Release                  | Major                   | Moderate         | Minor            |   |                   |                     |
| OR       |                 | Actual                   |                         |                  |                  |   |                   |                     |
|          |                 | Potential                | X                       |                  |                  | Percent 30.0%   |                   |                     |
| > > D#0  | a ka ma ma a    | tic Matrix               |                         |                  |                  |   |                   |                     |
| >>PIO    | yı allılla      | tic Matrix Falsification | Major                   | Moderate         | Minor            |   |                   |                     |
|          |                 | Tuisineación             | i iajoi                 | rioderate        | 7111101          | Percent 0.0%  |                   |                     |
|          |                 |                          |                         |                  |                  |   |                   |                     |
|          | Makein          | Failure to lo            | cate the water          | distribution lin | es below the fro | ost line could result in its damag  | e and             |                     |
|          | Matrix<br>Notes | introduction o           | of contaminants         | to the finished  |                  | rould exceed levels protective of   | human             |                     |
|          | 110103          |                          |                         |                  | health           |   |                   |                     |
|          |                 |                          |                         |                  |                  | Adjustment  | \$3,500           |                     |
|          |                 |                          |                         |                  |                  | Aujustilient  | \$3,300           |                     |
|          |                 |                          |                         |                  |                  |   |                   | \$1,500             |
| Violeti. | on Even         | t-a                      |                         |                  |                  |   |                   |                     |
| violatio | on Even         | ts                       |                         |                  |                  |   |                   |                     |
|          |                 | Number of \              | /iolation Events        | 3                |                  | 85 Number of violation da   | ays               |                     |
|          |                 |                          |                         |                  | . <u>!==</u>     | <u> </u>  | •                 |                     |
|          |                 |                          | daily                   |                  |                  |   |                   |                     |
|          |                 |                          | weekly                  |                  |                  |   |                   |                     |
|          |                 |                          | monthly                 | X                |                  | Violation Base  | Danaltur          | ¢4 E00              |
|          |                 |                          | quarterly<br>semiannual |                  |                  | violation Base  | Penaity           | \$4,500             |
|          |                 |                          | annual                  |                  |                  |   |                   |                     |
|          |                 |                          | single event            |                  |                  |   |                   |                     |
|          |                 |                          | -                       |                  |                  |   |                   |                     |
|          |                 | Three monthly            | v events are rec        | ommended, ca     | alculated from t | he February 26, 2024 investigat   | ion date          |                     |
|          |                 | ĺ                        |                         |                  | 21, 2024 screen  |   |                   |                     |
|          |                 |                          |                         |                  |                  |   |                   |                     |
| Good F   | aith Eff        | orts to Com              | ply                     | 0.0%             |                  | Re  | eduction          | \$0                 |
|          |                 |                          | E                       | Before NOE/NOV   | NOE/NOV to EDPF  | P/Settlement Offer  |                   |                     |
|          |                 |                          | Extraordinary           |                  |                  |   |                   |                     |
|          |                 |                          | Ordinary                |                  |                  |   |                   |                     |
|          |                 |                          | N/A                     | X                |                  |   |                   |                     |
|          |                 |                          | Notes                   | The Respond      |                  | eet the good faith criteria for   |                   |                     |
|          |                 |                          | Notes                   |                  | this vio         | plation.  |                   |                     |
|          |                 |                          |                         |                  |                  |   |                   |                     |
|          |                 |                          |                         |                  |                  | Violation S   | Subtotal          | \$4,500             |
| Econor   | nic Bene        | efit (EB) for            | this violati            | on               |                  | Statutory Limit 1   | Гest              |                     |
|          |                 |                          | ed EB Amount            |                  | \$222            | Violation Final Penal   | ty Total          | \$4,500             |
|          |                 | LStilliate               | eu LB AIIIOUNT          |                  | 4222             | Violation Fillat Penal  | ty i Otai         | φ <del>4</del> ,500 |
|          |                 |                          |                         | This vio         | lation Final As  | sessed Penalty (adjusted for  | r limits)         | \$4,500             |
|          |                 |                          |                         |                  |                  |   |                   |                     |

| Economic Benefit Worksheet                        |                |                      |                   |         |                           |  |                       |  |  |  |
|---|----------------|----------------------|-------------------|---------|---------------------------|--|-----------------------|--|--|--|
|   |                | Jtility Operating C  | Company, LLC      |         |                           |  |                       |  |  |  |
| Case ID No.                                       |                |                      |                   |         |                           |  |                       |  |  |  |
| Reg. Ent. Reference No.<br>Media<br>Violation No. | Public Water S |                      |                   |         |                           | Percent Interest                             | Years of 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                                     |                |                      |                   | 1       |                           |  |                       |  |  |  |
| 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<br>\$0                | n/a<br>n/a                                   | \$0<br>\$0            |  |  |  |
| Training/Sampling<br>Remediation/Disposal         |                |                      |                   | 0.00    | \$0                       | n/a  | \$0                   |  |  |  |
| Permit Costs                                      |                |                      |                   | 0.00    | \$0                       | n/a  | \$0                   |  |  |  |
| Other (as needed)                                 | \$3,000        | 26-Feb-2024          | 19-Aug-2025       | 1.48    | \$222                     | n/a  | \$222                 |  |  |  |
| Notes for DELAYED costs                           | inches belo    | w the ground surf    | ace, calculated f | rom the | e date of the investance. | n water lines to no<br>tigation to the estim | nated date of         |  |  |  |
| Avoided Costs                                     | ANNU           | ALIZE avoided o      | osts before en    | tering  |                           | 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                        |                | \$3,000              |                   |         | TOTAL                     |  | \$222                 |  |  |  |

|         |            | ning Date      |   |  |                             | <b>et No.</b> 2024-0960-PWS-E   |                                       | PCW                            |
|---------|------------|----------------|---|--|-----------------------------|---|---------------------------------------|--------------------------------|
|         | Re         | espondent      | CSWR-Texas U  | Itility Operatin   | g Company, LLC              |   | Policy Re                             | evision 5 (January 28, 2021)   |
|         | Ca         | ase ID No.     | 66054   |  |                             |   | PCW                                   | Revision February 11, 2021     |
| Rea.    | Ent. Refe  | erence No.     | RN101198331   |  |                             |   |                                       |                                |
|         |            |                | Public Water S  | upply  |                             |   |                                       |                                |
|         | Enf C      |                |   |  |                             |   |                                       |                                |
|         |            |                | Emerson Rinev   | vait   |                             |   |                                       |                                |
|         | Violat     | ion Number     | 6   |  |                             |   |                                       |                                |
|         |            | Rule Cite(s)   |   | 30 T   | ex. Admin. Code             | 8 290 44(a)(1)  |                                       |                                |
|         |            |                |   | 50 1   | cx. Admin. Code             | g 250.44(u)(1)  |                                       |                                |
|         |            |                | E-dada  |  | ada a tana ka Haratara tana | d l - k - d d k 6   |                                       |                                |
|         |            |                |   |  |                             | es and related products confor  |                                       |                                |
|         |            |                |   |  | •                           | nal Sanitation Foundation ("Al  | . ,                                   |                                |
|         | Violation  | Description    |   |  |                             | ation accredited by ANSI. Spe   |                                       |                                |
|         |            |                | the unburie   | d waterline wa   |                             | a material that did not confor  | m with                                |                                |
|         |            |                |   |  | ANSI/NSF Sta                | ndard 61.   |                                       |                                |
|         |            | l              |   |  |                             |   |                                       |                                |
|         |            |                |   |  |                             | Rase  | Penalty                               | \$5,000                        |
|         |            |                |   |  |                             | Dasi  | e remaity [                           | Ψ3,000                         |
| >> Fn:  | vironmen   | tal. Pronei    | rty and Hun   | nan Health   | Matrix                      |   |                                       |                                |
| LII     | VIIOIIIICI | itai, i i opci | ity ana man   | Harm   | HULIIX                      |   |                                       |                                |
|         |            | Release        | Major   | Moderate   | Minor                       |   |                                       |                                |
| OR      |            | Actual         | . 10,01   | Juciute  |                             |   |                                       |                                |
| OK      |            |                |   |  | Y .                         | Percent 7.0%  |                                       |                                |
|         |            | Potential      |   |  | X                           | Percent 7.0%  |                                       |                                |
|         |            |                |   |  |                             |   |                                       |                                |
| >>Pro   | grammat    | ic Matrix      |   |  |                             |   |                                       |                                |
|         |            | Falsification  | Major   | Moderate   | Minor                       |   |                                       |                                |
|         |            |                |   |  |                             | Percent 0.0%  |                                       |                                |
|         |            |                |   |  |                             |   |                                       |                                |
|         |            | Failure to use | approved piping   | that meets A   | NSI/NSF standa              | rds could expose persons serv   | ed by the                             |                                |
|         | Matrix     |                |   | -  | •                           | would not exceed levels prote   |                                       |                                |
|         | Notes      |                |   |  | uman health.                | mound mot exceed to total prote   | CC. 1 C C.                            |                                |
|         | L          |                |   |  | arriar ricarer.             |   |                                       |                                |
|         |            |                |   |  |                             | A dissatus aut  | #4.6E0                                |                                |
|         |            |                |   |  |                             | Adjustment  | \$4,650                               |                                |
|         |            |                |   |  |                             |   | Г                                     | \$350                          |
|         |            |                |   |  |                             |   |                                       |                                |
|         |            |                |   |  |                             |   | L                                     | 4555                           |
| Violati | on Event   | 2              |   |  |                             |   | L                                     | фэээ                           |
| Violati | on Event   | S              |   |  |                             |   | L                                     | 4333                           |
| Violati | on Event   |                | /iolation Events  | 1  |                             | Number of violation   | davs                                  | <del>,</del>                   |
| Violati | on Event   |                | /iolation Events  | 1  |                             | 85 Number of violation  | days                                  | Ç                              |
| Violati | on Event   |                |   | 1  |                             | Number of violation   | days                                  | Ç                              |
| Violati | on Event   |                | daily   | 1  |                             | 85 Number of violation  | days                                  | Ç                              |
| Violati | on Event   |                | daily<br>weekly   | 1  |                             | 85 Number of violation  | days                                  | Ç                              |
| Violati | on Event   |                | daily   | 1  |                             |   | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly   | 1  |                             | 85 Number of violation  Violation Base  | ,<br>_                                | \$350                          |
| Violati | on Event   |                | daily<br>weekly<br>monthly  | 1  |                             |   | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly<br>monthly<br>quarterly   | 1  |                             |   | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual                                       |  |                             |   | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly<br>monthly<br>quarterly<br>semiannual   | 1  |                             |   | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual                                       |  |                             |   | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual                                       | X  | event is recomm             | Violation Base  | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual                                       | X  | event is recomm             | Violation Base  | ,<br>_                                |                                |
| Violati | on Event   |                | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual                                       | X  | event is recomm             | Violation Base  | ,<br>_                                |                                |
|         |            | Number of V    | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual<br>single event                       | x One single   |                             | Violation Base  | e Penalty                             | \$350                          |
|         |            |                | daily weekly monthly quarterly semiannual annual single event   | x One single   |                             | Violation Base  | ,<br>_                                |                                |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   | X  One single  0.0%  Before NOE/NOV  |                             | Violation Base  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   | X  One single  0.0%  Before NOE/NOV  |                             | Violation Base  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   | X  One single  0.0%  Before NOE/NOV  |                             | Violation Base  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   | X One single  0.0% Before NOE/NOV  |                             | Violation Base  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event  ply  Extraordinary Ordinary            | One single  0.0% Sefore NOE/NOV  | NOE/NOV to EDPR             | Violation Base  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A       | X One single  0.0% Sefore NOE/NOV  X The Respondence of the second of th | NOE/NOV to EDPR             | Violation Base pended.  P/Settlement Offer pet the good faith criteria for  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event  ply  Extraordinary Ordinary            | X One single  0.0% Sefore NOE/NOV  X The Respondence of the second of th | NOE/NOV to EDPR             | Violation Base pended.  P/Settlement Offer pet the good faith criteria for  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A       | X One single  0.0% Sefore NOE/NOV  X The Respondence of the second of th | NOE/NOV to EDPR             | Violation Base pended.  P/Settlement Offer pet the good faith criteria for  | e Penalty                             | \$350                          |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A       | X One single  0.0% Sefore NOE/NOV  X The Respondence of the second of th | NOE/NOV to EDPR             | Violation Base pended.  P/Settlement Offer pet the good faith criteria for lation.  | Reduction                             | \$350<br>\$0                   |
|         |            | Number of V    | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A       | X One single  0.0% Sefore NOE/NOV  X The Respondence of the second of th | NOE/NOV to EDPR             | Violation Base pended.  P/Settlement Offer pet the good faith criteria for  | Reduction                             | \$350                          |
| Good F  | Faith Effo | Number of N    | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes | One single  0.0%  Before NOE/NOV  X  The Respond   | NOE/NOV to EDPR             | Violation Base Picture of the property of the good faith criteria for lation.   | Reduction Subtotal                    | \$350<br>\$0                   |
| Good F  | Faith Effo | rts to Com     | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes | X One single  0.0% Before NOE/NOV  X The Respond   | NOE/NOV to EDPR             | Violation Base  pended.  PySettlement Offer  eet the good faith criteria for lation.  Violation  Statutory Limit                      | Reduction  Subtotal  Test             | \$350<br>\$0<br>\$350          |
| Good F  | Faith Effo | rts to Com     | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes | X One single  0.0% Before NOE/NOV  X The Respond   | NOE/NOV to EDPR             | Violation Base Picture of the property of the good faith criteria for lation.   | Reduction  Subtotal  Test             | \$350<br>\$0                   |
| Good F  | Faith Effo | rts to Com     | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes | X  One single  0.0% Before NOE/NOV  X  The Respond   | NOE/NOV to EDPR             | violation Base  pended.  P/Settlement Offer  et the good faith criteria for lation.  Violation  Statutory Limit  Violation Final Pena | Reduction  Subtotal  Test  alty Total | \$350<br>\$0<br>\$350<br>\$350 |
| Good F  | Faith Effo | rts to Com     | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary N/A Notes | X  One single  0.0% Before NOE/NOV  X  The Respond   | NOE/NOV to EDPR             | Violation Base  pended.  PySettlement Offer  eet the good faith criteria for lation.  Violation  Statutory Limit                      | Reduction  Subtotal  Test  alty Total | \$350<br>\$0<br>\$350          |

|                               | E              | conomic             | <b>Benefit</b>   | Wor       | rksheet            |   |                       |
|-------------------------------|----------------|---------------------|------------------|-----------|--------------------|---|-----------------------|
| Respondent                    | CSWR-Texas     | Utility Operating C | ompany, LLC      |           |                    |   |                       |
| Case ID No.                   | 66054          | , ,                 |                  |           |                    |   |                       |
| 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              |                |                     |                  |           |                    |   |                       |
| rem bescription               |                |                     |                  |           |                    |   |                       |
| Delayed Costs                 |                |                     |                  |           |                    |   |                       |
| Equipment                     |                | 1                   |                  | 0.00      | \$0                | \$0                                       | \$0                   |
| Buildings                     |                |                     |                  | 0.00      | \$0                | \$0                                       | \$0                   |
| Other (as needed)             | \$500          | 26-Feb-2024         | 19-Aug-2025      | 1.48      | \$2                | \$49                                      | \$51                  |
| Engineering/Construction      | 4300           | 201002021           | 13 7 tag 2023    | 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       | ANSI/NSF St    | andard 61, calcula  | ated from the da | ate of th | e investigation to | unburied piping con<br>the estimated date | 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 |                | 1                   |                  | 0.00      | \$0                | \$0<br>\$0                                | \$0                   |
| Supplies/Equipment            |                |                     |                  | 0.00      | \$0                | \$0<br>\$0                                | \$0<br>\$0            |
| Financial Assurance           |                |                     |                  | 0.00      | \$0<br>\$0         | \$0<br>\$0                                | \$0<br>\$0            |
| ONE-TIME avoided costs        |                |                     |                  | 0.00      | \$0<br>\$0         | \$0                                       | \$0                   |
| Other (as needed)             |                | <u> </u>            |                  | 0.00      | \$0                | \$0                                       | \$0                   |
| Notes for AVOIDED costs       |                |                     |                  |           |                    |   |                       |
| Approx. Cost of Compliance    |                | \$500               |                  |           | TOTAL              |   | \$51                  |

|          | Screening Date               | 21-May-2024  |  | DOCK                                       | <b>et No.</b> 2024-096                        | 00-PW3-L                        |                                      | PCW                          |
|----------|------------------------------|--|--|--|---|---------------------------------|--------------------------------------|------------------------------|
|          | Respondent                   | CSWR-Texas U   | Itility Operatin                                     | g Company, LLC                             |   |                                 | Policy R                             | evision 5 (January 28, 2021) |
|          | Case ID No.                  | 66054  |  |  |   |                                 | PCW                                  | / Revision February 11, 2021 |
| Rea      | <b>Ent. Reference No.</b>    |  |  |  |   |                                 |                                      | , , ,                        |
| iteg.    |                              | Public Water S   | upply  |  |   |                                 |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          | Enf. Coordinator             |  | vait   |  |   |                                 |                                      |                              |
|          | Violation Number             |  |  |  |   |                                 |                                      | ,                            |
|          | Rule Cite(s)                 |  | 30 Te  | x. Admin. Code 8                           | 290.41(c)(1)(F)                               |                                 |                                      |                              |
|          |                              |  |  |  | , == = : = (=)(=)(: )                         |                                 |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          | <b>Violation Description</b> | Failed to obt  | ain a sanitary                                       |  | t covering land wit                           | :hin 150 fee                    | et of the                            |                              |
|          | Violation Description        | •  |  | Facility's                                 | well.   |                                 |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          |                              |  |  |  |   | Base                            | e Penalty                            | \$5,000                      |
| _        |                              |  |  |  |   |                                 |                                      |                              |
| >> Env   | vironmental, Prope           | erty and Hun   |  | Matrix                                     |   |                                 |                                      |                              |
|          | Dalaasa                      | Maiau  | Harm   | Minon                                      |   |                                 |                                      |                              |
| OΒ       | Release                      |  | Moderate   | Minor                                      |   |                                 |                                      |                              |
| OR       | Actua                        |  |  |  |   |                                 |                                      |                              |
|          | Potentia                     |  |  | X  | Percent                                       | 7.0%                            |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
| >>Prog   | grammatic Matrix             |  |  |  |   |                                 |                                      |                              |
|          | Falsification                | Major  | Moderate   | Minor                                      | _   |                                 |                                      |                              |
|          |                              |  |  |  | Percent                                       | 0.0%                            |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          | Matrix Failure to be         | :  |  | # :  |   |                                 | Fa ailib ba                          |                              |
|          |                              |  |  |  | xpose persons ser                             |                                 |                                      |                              |
|          | Notes an insignifica         | iit aiiiouiit oi coi   | itallillalits wi                                     | iicii would flot ex                        | ceed levels protect                           | ive or mum                      | an neamn.                            |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          |                              |  |  |  | Adjustment                                    |                                 | \$4,650                              |                              |
|          |                              |  |  |  | •   |                                 | , ,                                  |                              |
|          |                              |  |  |  |   |                                 |                                      |                              |
|          |                              |  |  |  |   |                                 |                                      | \$350                        |
|          |                              |  |  |  |   |                                 | l                                    | \$350                        |
| Violatio | on Events                    |  |  |  |   |                                 |                                      | \$350                        |
| Violatio |                              |  |  | i —  |   |                                 |                                      | \$350                        |
| Violatio |                              | Violation Events   | 1  |  | 85 Number o                                   | of violation                    | days                                 | \$350                        |
| Violatio |                              |  | 1  |  | 85 Number o                                   | of violation (                  | days                                 | \$350                        |
| Violatio |                              | daily  | 1  | <u> </u>                                   | 85 Number o                                   | of violation (                  | days                                 | \$350                        |
| Violatio |                              | daily<br>weekly  | 1  |  | 85 Number o                                   | of violation (                  | days                                 | \$350                        |
| Violatio |                              | daily  | 1  |  | 85 Number o                                   | of violation (                  | days                                 | ·                            |
| Violatio |                              | daily<br>weekly  | 1  |  |   | of violation of                 |                                      | \$350<br>\$350               |
| Violatio |                              | daily<br>weekly<br>monthly   | 1  |  |   |                                 |                                      | ·                            |
| Violatio |                              | daily<br>weekly<br>monthly<br>quarterly  | 1  |  |   |                                 |                                      | ·                            |
| Violatio |                              | daily<br>weekly<br>monthly<br>quarterly<br>semiannual  | 1 x  |  |   |                                 |                                      | ·                            |
| Violatio |                              | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual  |  |  |   |                                 |                                      | ·                            |
| Violatio |                              | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual  |  |  |   |                                 |                                      | ·                            |
| Violatio |                              | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual  | X  | event is recomm                            | Viol  |                                 |                                      | ·                            |
| Violatio |                              | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual  | X  | event is recomm                            | Viol  |                                 |                                      | ·                            |
|          | Number of                    | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual<br>single event                                    | x One single   | 7  | Viol  | ation Base                      | e Penalty                            | \$350                        |
|          |                              | daily weekly monthly quarterly semiannual annual single event  | x One single   | ]  | Viol<br>ended.                                | ation Base                      |                                      | ·                            |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event  | X One single  0.0% Before NOE/NOV                    | 7  | Viol<br>ended.                                | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event  | X One single  0.0% Before NOE/NOV                    | ]  | Viol<br>ended.                                | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event  | X One single  0.0% Before NOE/NOV                    | ]  | Viol<br>ended.                                | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event  | X One single  0.0% Before NOE/NOV                    | ]  | Viol<br>ended.                                | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary                        | One single  0.0%  Before NOE/NOV                     | NOE/NOV to EDPR                            | Violended.                                    | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event   ply  Extraordinary Ordinary                        | X One single  0.0% Before NOE/NOV  X The Respondence | NOE/NOV to EDPR                            | P/Settlement Offer et the good faith o        | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event  Extraordinary Ordinary N/A                          | X One single  0.0% Before NOE/NOV  X The Respondence | NOE/NOV to EDPR                            | P/Settlement Offer et the good faith o        | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event  Extraordinary Ordinary N/A                          | X One single  0.0% Before NOE/NOV  X The Respondence | NOE/NOV to EDPR                            | P/Settlement Offer et the good faith o        | ation Base                      | e Penalty                            | \$350                        |
|          | Number of                    | daily weekly monthly quarterly semiannual annual single event  Extraordinary Ordinary N/A                          | X One single  0.0% Before NOE/NOV  X The Respondence | NOE/NOV to EDPR                            | P/Settlement Offer et the good faith o        | ation Base                      | e Penalty                            | \$350                        |
| Good F   | Number of                    | daily weekly monthly quarterly semiannual annual single event  apply Extraordinary Ordinary N/A Notes              | One single  0.0%  Before NOE/NOV  X  The Respond     | NOE/NOV to EDPR                            | P/Settlement Offer et the good faith clation. | riteria for                     | e Penalty  Reduction  Subtotal       | \$350                        |
| Good F   | Number of                    | daily weekly monthly quarterly semiannual annual single event  apply Extraordinary Ordinary N/A Notes              | One single  0.0%  Before NOE/NOV  X  The Respond     | NOE/NOV to EDPR                            | P/Settlement Offer et the good faith clation. | riteria for                     | e Penalty  Reduction  Subtotal       | \$350                        |
| Good F   | Number of                    | daily weekly monthly quarterly semiannual annual single event   E Extraordinary Ordinary N/A Notes  r this violati | X One single  0.0% Before NOE/NOV  X The Respond     | NOE/NOV to EDPR                            | et the good faith clation.                    | riteria for Violation ory Limit | Reduction  Subtotal                  | \$350<br>\$0<br>\$350        |
| Good F   | Number of                    | daily weekly monthly quarterly semiannual annual single event  apply Extraordinary Ordinary N/A Notes              | X One single  0.0% Before NOE/NOV  X The Respond     | NOE/NOV to EDPR                            | et the good faith clation.                    | riteria for                     | Reduction  Subtotal                  | \$350                        |
| Good F   | Number of                    | daily weekly monthly quarterly semiannual annual single event   E Extraordinary Ordinary N/A Notes  r this violati | X One single  0.0% Before NOE/NOV  X The Respond     | NOE/NOV to EDPR  dent does not me this vio | et the good faith clation.                    | riteria for Violation Dry Limit | Reduction  Subtotal  Test alty Total | \$350<br>\$0<br>\$350        |

| Economic Benefit Worksheet    |                |                      |                  |           |                       |  |              |  |
|-------------------------------|----------------|----------------------|------------------|-----------|-----------------------|--|--------------|--|
| Respondent                    | CSWR-Texas l   | Utility Operating C  | Company, LLC     |           |                       |  |              |  |
| Case ID No.                   | 66054          |                      |                  |           |                       |  |              |  |
| Reg. Ent. Reference No.       |                |                      |                  |           |                       |  |              |  |
|                               | Public Water S |                      |                  |           |                       |  | Years of     |  |
| Violation No.                 |                | ,                    |                  |           |                       | Percent Interest   | 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      |                |                      |                  | 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)             | \$25           | 26-Feb-2024          | 19-Aug-2025      | 1.48      | \$2                   | n/a  | \$2          |  |
| Notes for DELAYED costs       |                | l (\$25 per well x   | one well), or to | obtain ai |                       | sanitary control eas<br>requirement, calcul<br>compliance. |              |  |
| Avoided Costs                 | ANNU           | ALIZE avoided o      | costs before er  | 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       |                |                      |                  |           |                       |  |              |  |
|                               |                | \$25                 | -                |           | TOTAL                 |  | \$2          |  |

|              |                       | ate 21-May-2024   |   |                      | et No. 2024-0960-PWS-E  | PCW  |
|--------------|-----------------------|---|---|----------------------|---|--|
|              | Respond               | ent CSWR-Texas  | Utility Operating   | g Company, LLC       |   | Policy Revision 5 (January 28, 2021)   |
|              | Case ID               | <b>No.</b> 66054  |   |                      |   | PCW Revision February 11, 2021   |
| Reg.         | <b>Ent. Reference</b> | No. RN10119833  | 1   |                      |   |  |
| _            | Me                    | dia Public Water  | Supply  |                      |   |  |
|              |                       | tor Emerson Rine  |   |                      |   |  |
|              | Violation Nun         |   |   |                      |   |  |
|              | Rule Cit              |   |   |                      |   |  |
|              |                       | (-)   | 30 Tex  | . Admin. Code §      | 290.46(m)(1)(B)   |  |
|              |                       |   |   |                      |   |  |
|              |                       |   |   |                      |   |  |
|              | Violation Descrip     | tion  | Failed to increat   | the Facility's two   | o pressure tanks annually.  |  |
|              | Violation Descrip     | .1011   | i alled to irispect   | . the racility 5 two | o pressure tanks annually.  |  |
|              |                       |   |   |                      |   |  |
|              |                       |   |   |                      |   |  |
|              |                       |   |   |                      | Page P  | φ  |
|              |                       |   |   |                      | Base P  | Penalty \$5,000  |
| >> En        | vironmental, Pr       | nerty and Hu  | man Health  | Matrix               |   |  |
| , , <u>-</u> | Vii Oiliii Ciitai, Ti | percy and ma  | Harm  | riderix              |   |  |
|              | Rele                  | <b>ase</b> Major  | Moderate  | Minor                |   |  |
| OR           | A                     | tual  |   |                      |   |  |
|              | Pote                  | ntial x   |   |                      | Percent 30.0%   |  |
|              |                       |   |   |                      |   |  |
| >>Pro        | grammatic Matı        |   |   |                      |   |  |
|              | Falsifica             | ion Major   | Moderate  | Minor                |   |  |
|              |                       |   |   |                      | Percent 0.0%  |  |
|              |                       |   |   |                      |   |  |
|              |                       |   |   |                      | tection of defects resulting in a   |  |
|              | Notes tank integral   | rity and could exp  |   |                      | ty to contaminants which would  | <u>exceed</u>  |
|              |                       |   | levels prote  | ective of human h    | nealth.   |  |
|              |                       |   |   |                      |   |  |
|              |                       |   |   |                      | Adjustment  | \$3,500  |
|              |                       |   |   |                      |   |  |
|              |                       |   |   |                      |   | ¢1 500   |
|              |                       |   |   |                      |   | \$1,500  |
| Violati      | on Events             |   |   |                      |   | \$1,500  |
| Violati      | on Events             |   |   |                      |   | \$1,500  |
| Violati      |                       | of Violation Event  | ts 2  |                      | Number of violation day   |  |
| Violati      |                       | of Violation Event  | ts 2  |                      | Number of violation day   |  |
| Violati      |                       | of Violation Event  | ts 2  |                      | Number of violation day   |  |
| Violati      |                       |   | ts 2  |                      | Number of violation day   |  |
| Violati      |                       | daily   | ts 2  |                      | Number of violation day   | ys   |
| Violati      |                       | daily<br>weekly   | ts 2  |                      | Number of violation day  Violation Base P   | ys   |
| Violati      |                       | daily<br>weekly<br>monthly  |   |                      |   | ys   |
| Violati      |                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual   |   |                      |   | ys   |
| Violati      |                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannual   |   |                      |   | ys   |
| Violati      |                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual   |   |                      |   | ys   |
| Violati      |                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual<br>single event                                     | t x   |                      | Violation Base P  | ys   |
| Violati      |                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual<br>single event                                     | t x   | ended (one even      |   | ys   |
| Violati      |                       | daily<br>weekly<br>monthly<br>quarterly<br>semiannual<br>annual<br>single event                                     | t x   | ended (one even      | Violation Base P  | ys   |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event   | nts are recomm  | ended (one even      | Violation Base P t for each pressure tank).   | venalty \$3,000  |
|              |                       | daily weekly monthly quarterly semiannual annual single event   | nts are recomm  | <u> </u>             | Violation Base P t for each pressure tank). Rec   | ys   |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve                                       | nts are recomm  25.0% Before NOE/NOV                          | ended (one even      | Violation Base P t for each pressure tank). Rec   | venalty \$3,000  |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve                                       | nts are recomm  25.0%  Before NOE/NOV  Ty                     | <u> </u>             | Violation Base P t for each pressure tank). Rec   | venalty \$3,000  |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve                                       | nts are recomm  25.0%  Before NOE/NOV  TY  TY  X              | <u> </u>             | Violation Base P t for each pressure tank). Rec   | venalty \$3,000  |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve                                       | nts are recomm  25.0%  Before NOE/NOV  TY  TY  X              | <u> </u>             | Violation Base P t for each pressure tank). Rec   | venalty \$3,000  |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar         | nts are recomm  25.0%  Before NOE/NOV  YY  X  A  The Response | NOE/NOV to EDPRP     | t for each pressure tank).  Reconstruction Base P   | venalty \$3,000  |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve                                       | nts are recomm  25.0%  Before NOE/NOV  YY  X  A  The Response | NOE/NOV to EDPRP     | t for each pressure tank).  Reconstruction Base P   | venalty \$3,000  |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar         | nts are recomm  25.0%  Before NOE/NOV  YY  X  A  The Response | NOE/NOV to EDPRP     | t for each pressure tank).  Reconstruction Base P   | venalty \$3,000  |
|              | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar         | nts are recomm  25.0%  Before NOE/NOV  YY  X  A  The Response | NOE/NOV to EDPRP     | t for each pressure tank).  Reconstruction Base P   | duction \$750  |
| Good F       | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar N/ Note | 25.0% Before NOE/NOV TY X The Respon                          | NOE/NOV to EDPRP     | t for each pressure tank).  Recompliance on February 28, 4.  Violation Su   | \$3,000   \$3,000  |
| Good F       | Numbe                 | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar N/ Note | 25.0% Before NOE/NOV TY X The Respon                          | NOE/NOV to EDPRP     | t for each pressure tank).  Reconstruction Base P   | \$3,000   \$3,000  |
| Good F       | Faith Efforts to (    | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar N/ Note | 25.0% Before NOE/NOV TY X The Respon                          | NOE/NOV to EDPRP     | Violation Base P  t for each pressure tank).  Rec  /Settlement Offer  pmpliance on February 28, 4.  Violation St  Statutory Limit T | \$3,000   \$3,000     \$3,000     \$750     \$2,250     \$2,250  |
| Good F       | Faith Efforts to (    | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar N/ Note | 25.0% Before NOE/NOV TY X The Respon                          | NOE/NOV to EDPRP     | t for each pressure tank).  Recompliance on February 28, 4.  Violation Su   | \$3,000   \$3,000     \$3,000     \$750     \$2,250     \$2,250  |
| Good F       | Faith Efforts to (    | daily weekly monthly quarterly semiannual annual single event  Two single eve  comply  Extraordinar Ordinar N/ Note | 25.0% Before NOE/NOV TY X The Respon                          | NOE/NOV to EDPRP     | Violation Base P  t for each pressure tank).  Rec  /Settlement Offer  pmpliance on February 28, 4.  Violation St  Statutory Limit T | \$3,000   \$3,000   \$750   \$2,250     \$2,250   \$ |

|                               | E              | conomic                               | Benefit          | Woi       | rksheet            |  |                       |
|-------------------------------|----------------|---------------------------------------|------------------|-----------|--------------------|--|-----------------------|
| Respondent                    | CSWR-Texas I   | Utility Operating C                   | Company, LLC     |           |                    |  |                       |
| Case ID No.                   | 66054          |                                       |                  |           |                    |  |                       |
| Reg. Ent. Reference No.       | RN101198331    |                                       |                  |           |                    |  |                       |
|                               | Public Water S |                                       |                  |           |                    | Percent Interest                             | Years of Depreciation |
| violation No.                 | 0              |                                       |                  |           |                    |  | -                     |
|                               |                |                                       |                  |           |                    | 5.0  | 15                    |
|                               | Item Cost      | Date Required                         | Final Date       | Yrs       | Interest Saved     | Costs Saved                                  | EB Amount             |
| Item Description              |                |                                       |                  |           |                    |  |                       |
|                               |                |                                       |                  |           |                    |  |                       |
| Delayed Costs                 |                |                                       |                  |           |                    |  |                       |
| Équipment                     |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Buildings                     |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Other (as needed)             |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Engineering/Construction      |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Land                          |                |                                       |                  | 0.00      | \$0                | n/a  | \$0                   |
| Record Keeping System         |                |                                       |                  | 0.00      | \$0                | n/a  | \$0                   |
| Training/Sampling             |                |                                       |                  | 0.00      | \$0                | n/a  | \$0                   |
| Remediation/Disposal          |                |                                       |                  | 0.00      | \$0                | n/a  | \$0                   |
| Permit Costs                  |                |                                       |                  | 0.00      | \$0                | n/a  | \$0                   |
| Other (as needed)             | \$82           | 26-Feb-2024                           | 28-Feb-2024      | 0.01      | \$0                | n/a  | \$0                   |
| Notes for DELAYED costs       | xt             | two tanks), calcula                   | ated from the da | ate of th | e investigation to | ure tank inspections<br>the date of compliar | nce.                  |
| Avoided Costs                 | ANNU           | ALIZE avoided o                       | osts before er   |           |                    | one-time avoided                             |                       |
| Disposal                      |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Personnel                     |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Inspection/Reporting/Sampling |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Supplies/Equipment            |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Financial Assurance           |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| ONE-TIME avoided costs        |                |                                       |                  | 0.00      | \$0<br>\$0         | \$0<br>\$0                                   | \$0<br>\$0            |
| Other (as needed)             |                |                                       |                  | 0.00      | \$0                | \$0  | \$0                   |
| Notes for AVOIDED costs       |                |                                       |                  |           |                    |  |                       |
|                               | ·              | · · · · · · · · · · · · · · · · · · · | ·                |           | ·                  | · · · · · · · · · · · · · · · · · · ·        |                       |

|         | Screening Dat            | <b>e</b> 21-May-2024                         |                   | Docket No.                                | 2024-0960-PWS-E                                  |              | PCW                       |
|---------|--------------------------|--|-------------------|---|--|--------------|---------------------------|
|         | Responder                | t CSWR-Texas Ut                              | ility Operating ( | Company, LLC                              |  | Policy Revis | sion 5 (January 28, 2021) |
|         | Case ID No               | 66054  |                   |   |  | PCW Re       | vision February 11, 2021  |
| Rea.    | <b>Ent. Reference No</b> | RN101198331                                  |                   |   |  |              |                           |
|         |                          | a Public Water Su                            | vlaaı             |   |  |              |                           |
|         | Enf. Coordinate          |  |                   |   |  |              |                           |
|         | Violation Numb           |  |                   |   |  |              |                           |
|         | Rule Cite(               |  |                   |   |  |              |                           |
|         | naic cite(               | -7   | 30 Tex            | . Admin. Code § 290.4                     | 13(c)(4)   |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         | Minimum Brandadi         |  | made discount did | la tha CCT with a limit                   | d formal to discuss on                           |              |                           |
|         | Violation Description    | on   | railed to provid  | le the GST with a liquid                  | d level indicator.                               |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          |  |                   |   | Base   | Penalty      | \$5,000                   |
| >> En:  | vironmontal Dron         | orty and Hum                                 | an Haalth M       | Antrix                                    |  |              |                           |
| >> EN   | vironmental, Prop        | erty and num                                 | Harm              | іасгіх                                    |  |              |                           |
|         | Releas                   | <b>se</b> Major                              | Moderate          | Minor                                     |  |              |                           |
| OR      | Actu                     |  |                   |   |  |              |                           |
|         | Potent                   |  |                   | Х   | Percent 7.0%                                     |              |                           |
|         |                          | <u>.                                    </u> |                   |   | 71070  |              |                           |
| >>Pro   | grammatic Matrix         |  |                   |   |  |              |                           |
|         | Falsificatio             |  | Moderate          | Minor                                     |  |              |                           |
|         |                          |  |                   |   | Percent 0.0%                                     |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          |  |                   |   |  | _            |                           |
|         |                          |  |                   | ay not allow the opera                    |  |              |                           |
|         |                          |  |                   | could expose persons                      |  |              |                           |
|         | insignigica              | nt amount or conta                           | aminants which    | would not exceed leve                     | els protective of numai                          | n nealth.    |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          |  |                   | Ad  | ljustment  | \$4,650      |                           |
|         |                          |  |                   |   |  |              | 1050                      |
|         |                          |  |                   |   |  |              | \$350                     |
| V:-I-4: | F                        |  |                   |   |  |              |                           |
| violati | on Events                |  |                   |   |  |              |                           |
|         | Number o                 | f Violation Events                           | 1                 | 85  | Number of violation of                           | davs         |                           |
|         | rumber e                 | r violation Events                           | -                 |   | I value of violation v                           | auys         |                           |
|         |                          | daily  |                   |   |  |              |                           |
|         |                          | weekly                                       |                   |   |  |              |                           |
|         |                          | monthly                                      |                   |   |  |              |                           |
|         |                          | quarterly                                    |                   |   | Violation Base                                   | Penalty      | \$350                     |
|         |                          | semiannual                                   |                   |   | Violation base                                   | . I charty   | Ψ550                      |
|         |                          | annual                                       |                   |   |  |              |                           |
|         |                          | single event                                 |                   |   |  |              |                           |
|         |                          | Siligle event                                | X                 |   |  |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          |  | One single ev     | vent is recommended.                      |  |              |                           |
|         |                          |  | g                 |   |  |              |                           |
|         |                          |  |                   |   |  | <u> </u>     |                           |
| Good I  | Faith Efforts to Co      | mply   | 0.0%              |   | J  | Reduction    | \$0                       |
|         |                          |  | efore NOE/NOV N   | IOE/NOV to EDPRP/Settleme                 | ent Offer  |              |                           |
|         |                          | Extraordinary                                |                   |   |  |              |                           |
|         |                          |  |                   |   |  |              |                           |
|         |                          | Ordinary                                     |                   |   |  |              |                           |
|         |                          | Ordinary<br>N/A                              | X                 |   |  |              |                           |
|         |                          | Ordinary<br>N/A                              |                   |   |  |              |                           |
|         |                          | N/A  |                   | nt does not meet the g                    | ood faith criteria for                           |              |                           |
|         |                          |  |                   | nt does not meet the g<br>this violation. | ood faith criteria for                           |              |                           |
|         |                          | N/A  |                   |   | ood faith criteria for                           |              |                           |
|         |                          | N/A  |                   |   | ood faith criteria for<br>Violation              | Subtotal     | \$350                     |
|         |                          | N/A<br>Notes                                 | The Responder     |   | Violation  |              | \$350                     |
| Econo   | mic Benefit (EB) f       | N/A<br>Notes                                 | The Responder     |   |  |              | \$350                     |
| Econo   |                          | N/A<br>Notes<br>or this violation            | The Responder     | this violation.                           | Violation Statutory Limit                        | Test         |                           |
| Econo   |                          | N/A<br>Notes                                 | The Responder     | this violation.                           | Violation  | Test         | \$350<br>\$350            |
| Econo   |                          | N/A<br>Notes<br>or this violation            | The Responder     | this violation.                           | Violation  Statutory Limit  Violation Final Pena | Test         |                           |

|                               | E              | conomic              | Benefit           | Wor      | ksheet                |                  |                  |
|-------------------------------|----------------|----------------------|-------------------|----------|-----------------------|------------------|------------------|
| Respondent                    | CSWR-Texas l   | Jtility Operating C  | ompany, LLC       |          |                       |                  |                  |
| Case ID No.                   | 66054          |                      |                   |          |                       |                  |                  |
| Reg. Ent. Reference No.       | RN101198331    |                      |                   |          |                       |                  |                  |
|                               | Public Water S |                      |                   |          |                       | Dawasuk Tukawask | Years of         |
| Violation No.                 |                | ,,,                  |                   |          |                       | Percent 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                     | \$200          | 26-Feb-2024          | 20-Jul-2025       | 1.40     | \$1                   | \$19             | \$20             |
| Buildings                     |                |                      |                   | 0.00     | \$0                   | \$0              | \$0              |
| Other (as needed)             |                |                      |                   | 0.00     | \$0                   | \$0              | \$0              |
| Engineering/Construction      |                |                      |                   | 0.00     | \$0                   | \$0              | \$0              |
| Land                          |                |                      |                   | 0.00     | \$0                   | n/a              | \$0              |
| Record Keeping System         |                |                      |                   | 0.00     | \$0                   | n/a              | \$0              |
| Training/Sampling             |                |                      |                   | 0.00     | \$0                   | n/a              | \$0              |
| Remediation/Disposal          |                |                      |                   | 0.00     | \$0                   | n/a              | \$0              |
| Permit Costs                  |                |                      |                   | 0.00     | \$0                   | n/a              | \$0              |
| Other (as needed)             |                |                      |                   | 0.00     | \$0                   | n/a              | \$0              |
| Notes for DELAYED costs       | ,              | from the date        | e of the investig | ation to | the estimated dat     | ·                | ·                |
| 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            |                |                      |                   | 0.00     | \$0                   | \$0              | \$0              |
| Financial Assurance           |                |                      |                   | 0.00     | \$0                   | \$0              | \$0              |
| ONE-TIME avoided costs        |                |                      |                   | 0.00     | \$0                   | \$0              | \$0              |
| Other (as needed)             |                |                      |                   | 0.00     | \$0                   | \$0              | \$0              |
| Notes for AVOIDED costs       |                |                      |                   |          |                       |                  |                  |
| Approx. Cost of Compliance    |                | \$200                |                   |          | TOTAL                 |                  | \$20             |

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 CN605844786, RN101198331, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Classification: SATISFACTORY

Rating: 3.16

Rating: N/A

Customer, Respondent, CN605844786, CSWR-Texas Utility

or Owner/Operator: Operating Company, LLC

Regulated Entity: RN101198331, AERO VALLEY WATER Classification: NOT APPLICABLE

**SERVICE** 

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

CH Group: 14 - Other

**Location:** 5281 KELLY DRIVE NEAR ROANOKE, DENTON COUNTY, TEXAS

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

0610243

Compliance History Period: September 01, 2019 to August 31, 2024 Rating Year: 2024 Rating Date: 09/01/2024

**Date Compliance History Report Prepared:** November 05, 2024 **Agency Decision Requiring Compliance History:** Enforcement

Component Period Selected: November 05, 2019 to November 05, 2024

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

Name: Emerson Rinewalt Phone: (512) 239-1131

#### 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.):

Item 2 June 30, 2021 (1737680)

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:

Notice of Intent Date: 09/05/2022 (1841815)

Disclosure Date: 09/05/2022 Viol. Moderate

Classification:

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

Description: Failed to conduct customer service inspections.

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

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

**Sites Outside of Texas:** 

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



| IN THE MATTER OF AN          | § | BEFORE THE            |
|------------------------------|---|-----------------------|
| ENFORCEMENT ACTION           | § |                       |
| CONCERNING                   | § | TEXAS COMMISSION ON   |
| CSWR-TEXAS UTILITY OPERATING | § | TEAAS COMMISSION ON   |
| COMPANY, LLC                 | § |                       |
| RN101198331                  | § | ENVIRONMENTAL QUALITY |

### AGREED ORDER DOCKET NO. 2024-0960-PWS-E

#### I. JURISDICTION AND STIPULATIONS

| On                  | , the Texas Commission on Environmental Quality ("the                        |
|---------------------|--|
| Commission" or "T   | CEQ") considered this agreement of the parties, resolving an enforcement     |
| action regarding C  | SWR-Texas Utility Operating Company, LLC (the "Respondent") under the        |
| authority of Tex. H | EALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the |
| Enforcement Divis   | ion, and the Respondent together stipulate that:                             |

- 1. The Respondent owns and operates a public water supply located at 5281 Kelly Drive near Roanoke, Denton County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 34 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 \$14,550 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$11,640 of the penalty and \$2,910 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 on February 28, 2024, the Respondent submitted copies of the exterior pressure tank inspection forms for both pressure tanks at the Facility.

#### II. ALLEGATIONS

During an investigation at the Facility conducted on February 26, 2024, an investigator documented that the Respondent:

- 1. Failed to provide a pressure tank capacity of 20 gallons per connection, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(B)(iv) and Tex. Health & Safety Code § 341.0315(c). Specifically, the Facility had 34 connections requiring a pressure tank capacity of 680 gallons. However, only 120 gallons of pressure tank capacity were provided, indicating an 82% deficiency.
- 2. Failed to provide a total storage capacity of 200 gallons per connection, in violation of 30 Tex. Admin. Code § 290.45(b)(1)(B)(ii) and Tex. Health & Safety Code § 341.0315(c). Specifically, the Facility had 34 connections requiring a total storage capacity of 6,800 gallons. However, only 5,000 gallons of total storage capacity were provided, indicating an 26% deficiency.
- 3. 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)(B)(i) and Tex. Health & Safety Code § 341.0315(c). Specifically, the Facility had 34 connections requiring a well capacity of 20.4 gpm. However, only 18 gpm of well capacity was provided, indicating a 12% deficiency.
- 4. Failed to ensure that all potable water storage facilities are covered and designed, fabricated, erected, tested, and disinfected in strict accordance with current American Water Works Association ("AWWA") standards, in violation of 30 Tex. ADMIN. CODE § 290.43(c). Specifically, the Facility's ground storage tank ("GST") was made of black polyethylene material that did not meet AWWA standards.
- 5. Failed to install water transmission and distribution lines below the frost line and in no case less than 24 inches below the ground surface, in violation of 30 Tex. ADMIN. CODE

§ 290.44(a)(4). Specifically, there was an unburied water line that ran through a dry creek bed at the Facility.

- 6. Failed to ensure that all newly installed pipes and related products conform to the American National Standards Institute/National Sanitation Foundation ("ANSI/NSF") Standard 61 and are certified by an organization accredited by ANSI, in violation of 30 Tex. Admin. Code § 290.44(a)(1). Specifically, the unburied waterline was constructed of a material that did not conform with ANSI/NSF Standard 61.
- 7. Failed to obtain a sanitary control easement covering land within 150 feet of the Facility's well, in violation of 30 Tex. ADMIN. CODE § 290.41(c)(1)(F).
- 8. Failed to inspect the Facility's two pressure tanks annually, in violation of 30 Tex. ADMIN. CODE § 290.46(m)(1)(B).
- 9. Failed to provide the GST with a liquid level indicator, in violation of 30 Tex. ADMIN. CODE § 290.43(c)(4).

#### 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: CSWR-Texas Utility Operating Company, LLC, Docket No. 2024-0960-PWS-E" to:

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

- 2. The Respondent shall undertake the following technical requirements:
  - a. Within 60 days after the effective date of this Order:
    - i. Replace or upgrade the Facility's storage tank to meet the current AWWA standards, in accordance with 30 Tex. ADMIN. CODE § 290.43; and
    - ii. Provide the GST with a liquid level indicator, in accordance with 30 Tex. ADMIN. CODE § 290.43.
  - b. Within 75 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.f below, and include detailed supporting

documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.i and 2.a.ii.

- c. Within 90 days of the effective date of this Order:
  - i. Ensure that all waterlines and distribution lines are located below the frost line and no case less than 24 inches below the ground surface, in accordance with 30 Tex. ADMIN. CODE § 290.44;
  - ii. Ensure that all pipes and related products conform to the ANSI/NSF Standard 61, including but not limited to the unburied waterline that ran through the creek at the Facility, in accordance with 30 Tex. ADMIN. CODE § 290.44; and
  - iii. Obtain a sanitary control easement that covers the land within 150 feet of the Facility's well, in accordance with 30 Tex. Admin. Code § 290.41, or obtain Commission approval of an exception to the easement requirement pursuant to 30 Tex. Admin. Code § 290.39(l). The exception request shall be submitted to:

Technical Review and Oversight Team Water Supply Division, MC 159 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- d. Within 105 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.f below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.c.i through 2.c.iii.
- e. Within 180 days after the effective date of this Order:
  - i. Provide a pressure tank capacity of at least 20 gallons per connection, in accordance with 30 Tex. ADMIN. CODE § 290.45;
  - ii. Provide a total storage capacity of at least 200 gallons per connection, in accordance with 30 Tex. ADMIN. CODE § 290.45; and
  - iii. Provide a well capacity of at least 0.6 gpm per connection, in accordance with 30 Tex. ADMIN. CODE § 290.45.
- f. 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.e.i through 2.e.iii. 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 Dallas/Fort Worth Regional Office Texas Commission on Environmental Quality 2309 Gravel Drive Fort Worth, Texas 76118-6951

- 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,

CSWR-Texas Utility Operating Company, LLC DOCKET NO. 2024-0960-PWS-E Page 6

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.

CSWR-Texas Utility Operating Company, LLC DOCKET NO. 2024-0960-PWS-E Page 7

#### SIGNATURE PAGE

| TEXAS | COMMISSION | ON | ENVIRON | MENTAL | OUALITY |
|-------|------------|----|---------|--------|---------|
|       |            |    |         |        |         |

| For the Commission         | Date     |  |
|----------------------------|----------|--|
|                            | 4/4/2025 |  |
| For the Executive Director | Date     |  |

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

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

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

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

| Josiah Cox (Jan 6, 2025 10:53 CST)              | 01/06/2025             |           |          |
|---|------------------------|-----------|----------|
| Signature                                       | Date                   |           |          |
| orginitare                                      | Duce                   |           |          |
| Josiah Cox                                      | President              |           |          |
| Name (Printed or typed)                         | Title                  |           |          |
| Authorized Representative of                    |                        |           |          |
| CSWR-Texas Utility Operating Company, LLC       |                        |           |          |
| The siling address has shared places should the | is how and provide the | now addra | ss halow |

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