Order Type: Default Order

Media: MLM: PWS and WR

Small Business:

Yes

Location(s) Where Violation(s) Occurre approximately .25 miles west southwest of					
Type of Operation: public water system					
Other Significant Matters: Additional Pending Enforcement Actions: Past-Due Penalties: Past-Due Fees: Other: Interested Third-Parties:	None None \$238.85 (Acct. No. 90910143; referred for collection) \$355.50 (2015-0327-PWS-E; referred for collection) None None				
Texas Register Publication Date:	May 20, 2016				
Comments Received:	None				
Pen	alty Information				
Total Penalty Assessed:	\$8,884				
Total Paid to General Revenue:	\$0				
Total Due to General Revenue:	\$8,884				
Compliance History Classifications: Person/CN –Satisfactory Site/RN – N/A					
Major Source:	No				
Statutory Limit Adjustment:	\$43 upward adjustment (PCW 2)				
Applicable Penalty Policy:	April 2014				

Investigation Information

Complaint Date(s): Complaint Information:	July 8, 2015 Alleged frequent low pressure and water outages.
Date(s) of Investigation:	July 1, 2015 through July 29, 2015
Date(s) of NOV(s):	November 13, 2014; December 26, 2014
Date(s) of NOE(s):	September 8, 2015

Violation Information

- 1. Failed to adopt a drought contingency plan which includes all elements for municipal use by a retail public water supplier [TEX. WATER CODE § 11.1272(c) and 30 TEX. ADMIN. CODE §§ 288.20(a) and 288.30(5)(B)].
- Failed to operate the Facility under the direct supervision of a licensed water works operator who holds a Class "D" or higher license [TEX. HEALTH & SAFETY CODE § 341.033(a) and 30 TEX. ADMIN. CODE § 290.46(e)(4)(A)].
- 3. Failed to issue a boil water notification to the customers of the Facility within 24 hours of a low pressure event or water outage using the prescribed format [30 TEX. ADMIN. CODE § 290.47(e), in violation of 30 TEX. ADMIN. CODE § 290.46(q)(1) and (2)].
- 4. Failed to provide a well capacity of 0.6 gpm per connection [TEX. HEALTH & SAFETY CODE § 341.0315(c) and 30 TEX. ADMIN. CODE § 290.45(b)(1)(C)(i)].
- 5. Failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements [30 Tex. ADMIN. CODE § 290.121(a) and (b)].
- 6. Failed to provide a copy of a boil water notification to the Executive Director within ten days of its distribution [30 TEX. ADMIN. CODE §§ 290.46(q)(1) and 290.122(f)].
- 7. Failed to obtain a sanitary control easement that covers the land within 150 feet of the Facility's active well [30 TEX. ADMIN. CODE § 290.41(c)(1)(F)].
- 8. Failed to ensure the wellhouse is locked during periods of darkness and when the Facility is unattended [30 TEX. ADMIN. CODE § 290.41(c)(3)(O)].
- 9. Failed to provide an all-weather access road to the Facility's active well site [30 TEX. ADMIN. CODE § 290.41(c)(3)(P)].
- 10. Failed to ensure that the Facility's water treatment plant is located at a site that is accessible by an all-weather access road [30 TEX. ADMIN. CODE § 290.42(a)(3)].
- 11. Failed to provide a full-face self contained breathing apparatus ("SCBA") or supplied air respirator that meets Occupational Safety and Health Administration ("OSHA") standards for construction and operation, and a small bottle of fresh ammonia solution (or approved equal) for testing for chlorine leakage readily accessible outside the chlorinator room and immediately available to the operator in the event of an emergency [30 Tex. ADMIN. CODE § 290.42(e)(4)(A)].
- 12. Failed to maintain housing for gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or partitions separating all mechanical and electrical equipment from the chlorine [30 Tex. ADMIN. CODE § 290.42(e)(4)(B)].
- Failed to provide adequate ventilation which includes high level and floor level screened vents for all enclosures in which chlorine gas is being stored or fed [30 TEX. ADMIN. CODE § 290.42(e)(4)(C)].

- 14. Failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference [30 Tex. ADMIN. CODE § 290.42(I)].
- 15. Failed to provide a pressure tank of 1,000 gallons or larger that meets American Society for Mechanical Engineers ("ASME") Section VIII, Division 1 Codes and Construction Regulations, and which is provided with the required ASME name plate [30 TEX. ADMIN. CODE § 290.43(d)(1)].
- 16. Failed to provide a device to readily determine air-water-volume for the pressure tank [30 TEX. ADMIN. CODE § 290.43(d)(3)].
- 17. Failed to ensure the water treatment plant and all appurtenances thereof are enclosed by an intruder-resistant fence and failed to ensure that the pressure tank is installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates [30 Tex. ADMIN. CODE §§ 290.42(m) and 290.43(e)].
- Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request [30 TEX. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(i)(III), (f)(3)(A)(ii)(III), (f)(3)(A)(iii), (f)(3)(A)(vi), (f)(3)(B)(iv), (f)(3)(D)(i), (f)(3)(D)(ii), (f)(3)(D)(vii), (f)(3)(E)(ii), (f)(3)(E)(iv), and (f)(3)(F)].
- 19. Failed to maintain a supply of calcium hypochlorite on hand for use when making repairs [30 TEX. ADMIN. CODE § 290.46(h)].
- 20. Failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted [30 TEX. ADMIN. CODE § 290.46(i)].
- 21. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment [30 TEX. ADMIN. CODE § 290.46(m)].
- 22. Failed to maintain all distribution system lines, storage and pressure maintenance facilities, water treatment units, and all related appurtenances in a watertight condition [30 TEX. ADMIN. CODE § 290.46(m)(4)].
- 23. Failed to maintain all pumps, motors, valves, and other mechanical devices in good working condition [30 Tex. ADMIN. CODE § 290.46(m)(6)].
- 24. Failed to provide accurate and up-to-date detailed as-built plans or record drawings and specifications for the storage tank, pressure tank, and service pumps [30 Tex. ADMIN. CODE § 290.46(n)(1)].
- 25. Failed to maintain copies of well completion data such as well material setting data, geological log, sealing information (pressure cementing and surface protection), disinfection information, microbiological sample results, and a chemical analysis report of a representative sample of water from the well for as long as the well remains in service [30 TEX. ADMIN. CODE § 290.46(n)(3)].
- 26. Failed to provide a minimum pressure of 35 psi throughout the distribution system under normal operating conditions and 20 psi during emergencies such as firefighting [30 TEX. ADMIN. CODE §§ 290.44(d) and 290.46(r)].
- 27. Failed to provide a minimum pressure of 35 psi throughout the distribution system under normal operating conditions and 20 psi during emergencies such as firefighting [30 TEX. ADMIN. CODE §§ 290.44(d) and 290.46(r)].
- 28. Failed to post a legible sign at the Facility's production, treatment, and storage facilities that contains the name of the Facility and emergency telephone numbers where a responsible official can be contacted [30 TEX. ADMIN. CODE § 290.46(t)].

- 29. Failed to plug an abandoned public water supply well owned by the system with cement according to 16 Tex. ADMIN. CODE ch. 76 [30 Tex. ADMIN. CODE § 290.46(u)].
- 30. Failed to ensure that the electrical wiring is securely installed in compliance with a local or national electrical code [30 TEX. ADMIN. CODE § 290.46(v)].
- 31. Failed to flush all dead-end mains at monthly intervals [30 TEX. ADMIN. CODE § 290.46(I)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

None

Technical Requirements:

- 1. Within 30 days:
 - a. Begin to operate the Facility under the direct supervision of a water works operator who holds a Class "D" or higher license (Violation No. 2);
 - b. Develop and begin maintaining a written protocol that is to be followed to ensure that proper notification and boil water notices are provided to the customers of the Facility in the event of low distribution system pressure below 20 psi, water outages, positive microbiological samples, low chlorine residuals, or other conditions which indicate that the water supply may be compromised (Violation No. 3);
 - c. Incorporate the flowchart identified in 30 Tex. Admin. Code § 290.47(e) into the Facility's plant operations manual, conduct employee training, and implement the procedures outlined in the flowchart to ensure that all required boil water notices are provided to the customers of the Facility within 24 hours of a low distribution pressure event, water outage, positive Escherichia coli or fecal coliform sample, low chlorine residual, elevated finished water turbidity level, or other condition which indicates that the potability of the drinking water has been compromised (Violation No. 3);
 - d. Develop and begin maintaining a chemical and microbiological monitoring plan (Violation No. 5);
 - e. Implement procedures to ensure that copies of all boil water notifications are submitted to the Executive Director (Violation No. 6);
 - f. Ensure that the wellhouse is locked during periods of darkness and when the plant is unattended (Violation No. 8);
 - g. Provide a full-face SCBA or supplied air respirator that meets OSHA standards for construction and operation, and a small bottle of fresh ammonia solution for testing for chlorine leakage readily accessible outside the chlorinator room and immediately available to the operator in the event of an emergency (Violation No. 11);
 - h. Compile and begin maintaining properly completed monthly water works operation and maintenance records, including but not limited to: the amount of each chemical used each week; the amount of water treated each week; the date, location, and nature of water quality, pressure, or outage complaints received by the system and the results of any subsequent complaint investigation; the maintenance records for water system equipment and facilities; the disinfectant residual monitoring results from the distribution system; the calibration records for flow meters; the results of microbiological analyses; the results of inspections for all water storage and pressure maintenance facilities; Consumer Confidence Report compliance documentation; the results of chemical analyses; copies of the Customer Service Inspection reports; and lead and copper tap water monitoring results (Violation No. 18);
 - i. Begin maintaining a supply of calcium hypochlorite on hand for use when making repairs (Violation No. 19);

- j. Begin maintaining a minimum pressure of 35 psi throughout the distribution system under normal operating conditions and a minimum pressure of 20 psi during emergencies such as firefighting (Violation Nos. 26 and 27). This provision will be satisfied upon three months of weekly compliant pressure readings;
- Provide a legible sign with the water supply name and an emergency telephone number where a responsible official can be contacted at each production, treatment, and storage facility, including but not limited to the well site and the water treatment plant (Violation No. 28);
- I. Ensure that the electrical wiring is securely installed in compliance with a local or national electrical code in the wellhouse and the pump room (Violation No. 30; and
- m. Begin flushing all dead-end mains at monthly intervals (Violation No. 31).
- 2. Within 45 days, submit written certification to demonstrate compliance with Technical Requirement Nos. 1.a. through 1.i. and 1. k. through 1.m.
- 3. Within 60 days:
 - a. Provide impervious walls or partitions separating all mechanical and electrical equipment from the chlorine at the plant (Violation No. 12);
 - b. Provide high level and floor level screened vents for all rooms where chlorine gas is being stored or fed (Violation No. 13);
 - c. Compile and begin maintaining a plant operations manual for operator review and reference (Violation No. 14);
 - d. Provide a device to readily determine air-water-volume for the pressure tank (Violation No. 16);
 - e. Initiate maintenance and good housekeeping practices including, but not limited to: repairing the interior and exterior walls and remove all signs of feces and debris at the wellhouse and the water treatment plant housing and ensuring the operational stability of the ground storage tank (Violation No. 21);
 - f. Begin maintaining all distribution system lines, storage and pressure maintenance facilities, water treatment units, and related appurtenances in a watertight condition, including but not limited to repairing the leak in the water treatment plant housing (Violation No. 22); and
 - g. Begin maintaining all pumps, motors, valves, and other mechanical devices in good working condition, including repairing the service pumps (Violation No. 24).
- 4. Within 75 days, submit written certification to demonstrate compliance with Technical Requirement Nos. 3.a. through 3.g.
- 5. Within 90 days:
 - a. Prepare and adopt a complete drought contingency plan, in accordance with 30 Tex. ADMIN. CODE §§ 288.20 and 288.30 (Violation No.1);
 - b. Obtain a sanitary control easement that covers the land within 150 feet of the Facility's active well (Violation No. 7);
 - c. Provide an all-weather access road the Facility's active well (Violation No. 9);
 - d. Provide an all-weather access road for the Facility's water treatment plant (Violation No. 10);
 - e. Repair the fence at the water-treatment plant such that it is intruder-resistant and provide the pressure tank with an intruder-resistant fence or lockable building (Violation No. 17);
 - f. Adopt and maintain an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted (Violation No. 20); and
 - g. Ensure that well no. G0910143B is properly plugged with cement (Violation No. 29).

- 6. Within 105 days, submit written certification to demonstrate compliance with Technical Requirement Nos. 5.a. through 5.g.
- 7. Within 135 days, submit written certification to demonstrate compliance with Technical Requirement No. 1.j.
- 8. Within 180 days:
 - a. Provide a minimum well capacity of 0.6 gpm per connection (Violation No. 4);
 - b. Provide an approved pressure tank which includes the required ASME name plate (Violation No. 15);
 - Begin maintaining accurate and up-to-date detailed as-built plans or record drawings and specifications for the storage tank, pressure tank, and service pumps (Violation No. 24); and
 - d. Begin maintaining well completion data such as well material setting data, geological log, sealing information (pressure cementing and surface protection), disinfection information, microbiological sample results, and a chemical analysis report of a representative sample of water from the well (Violation No. 25).
- 9. Within 195 days, submit written certification to demonstrate compliance with Technical Requirement Nos. 8.a. through 8.d.

	Litigation Information
Date Petition(s) Filed:	March 31, 2016
Date Green Card(s) Signed:	Unclaimed
Date Answer(s) Filed:	N/A

Contact Information

TCEQ Attorneys: Ryan Rutledge, Litigation Division, (512) 239-3400 Rudy Calderon, Public Interest Counsel, (512) 239-6363

TCEQ Enforcement Coordinator: Michaelle Garza, Enforcement Division, (210) 403-4076

TCEQ Regional Contact: Jeff Tate, Dallas/Fort Worth Regional Office, (817) 588-5800

Respondent Contact: Sandra Barbey, LASS WATER COMPANY INC, P.O. Box 314, Magnolia, Texas 77353-0314

Respondent's Attorney: N/A

								PCW 1 of 2	
\sim		Po	nalty C	alculatio	n Workst	neet (PC	`\//)		
	Policy Revision 4 (A		nanty o	alculatio			•	Revision March 20	6 2014
TCEQ		5111 2011)							57 2011
DATES	Assigned						7		
	PCW	23-Sep-2015	Screening	22-Sep-2015	EPA Due				
RESPO	NDENT/FACILI	TY INFORMATIO	ON						
	Respondent	LASS WATER CO							
	g. Ent. Ref. No.						.		
Facili	ty/Site Region	4-Dallas/Fort Wo	orth		Major/N	linor Source	Minor		
CASE I	NFORMATION								
En	f./Case ID No.				No.	of Violations			
		2015-1450-MLM-	-E			Order Type	¥		
INIEC	lia Program(s)	Public Water Sup				t/Non-Profit	No Michaelle Garz	2	
	Matti-Meala	Tublic Water Sup	pry				Enforcement T		
Adr	min. Penalty \$ I	Limit Minimum	\$0	Maximum	\$5,000				
			Penal	ty Calcula	tion Section	on			
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation	base penalt	ties)		Subtotal 1		\$250
	CTMENITO (/-) TO SUBTO							
ADJU	Subtotals 2-7 are of	otained by multiplying	the Total Base	Penalty (Subtotal 1) by the indicated	percentage.			
	Compliance Hi	story		10.0%	Enhancement	Subto	tals 2, 3, & 7		\$25
	Notes	Enhancom	opt for two l	NOVs with the s	amo/cimilar vio	lations			
	Notes	Ennancem			ame/similar viu				
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	ouipublity			0.070	Ennancement				
	Notes	The Re	spondent do	es not meet the	e culpability crite	eria.			
							1		
	Good Faith Eff	ort to Comply To	otal Adjust	ments			Subtotal 5		\$0
	Economic Ben	efit		0.0%	Enhancement*		Subtotal 6		\$0
	Fatimated	Total EB Amounts	\$17		d at the Total EB \$	Amount			
	Estimated	Cost of Compliance	\$360	1					
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal		\$275
		AS JUSTICE M			0.0%		Adjustment		\$0
Reduces		I Subtotal by the indic	ateu percentag	e.			1		
	Notes								
						Final Per	nalty Amount		\$275
STAT		FADJUSTMEN	ІТ			Final Asso	ssed Penalty		\$275
JIAN		ADJUJINEN	• •			i illai A33e	sseu renaity		<u> </u>
DEFE					0.0%	Reduction	Adjustment		\$0
Reduces	the Final Assessed Pe	enalty by the indicated	d percentage.	Enter number only	: e.g. 20 for 20% re	eduction.)	7		
	Notes	No	leferral is rea	commended for	Findings Orders	5			
	110163				i indings orders				
							-		
PAYA	BLE PENALT	Y							\$275

Screening Date22-Sep-2015DockerRespondentLASS WATER COMPANY INCCase ID No.51306Reg. Ent. Reference No.RN104487335

Media [Statute] Water Rights

Enf. Coordinator Michaelle Garza

Compliance History Worksheet

Compliance History Site Enhancement (Subtotal 2) >> Component Number of... Enter Number Here Adjust. Written notices of violation ("NOVs") with same or similar violations as those in 2 10% the current enforcement action (number of NOVs meeting criteria) NOVs Other written NOVs 0 0% Any agreed final enforcement orders containing a denial of liability (number of 0% 0 orders meeting criteria) Any adjudicated final enforcement orders, agreed final enforcement orders Orders without a denial of liability, or default orders of this state or the federal 0 0% government, or any final prohibitory emergency orders issued by the commission Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or 0 0% Judgments consent decrees meeting criteria) and Consent Any adjudicated final court judgments and default judgments, or non-adjudicated Decrees final court judgments or consent decrees without a denial of liability, of this state 0% 0 or the federal government Any criminal convictions of this state or the federal government (number of Convictions 0 0% counts) Emissions Chronic excessive emissions events (number of events) 0% 0 Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 0 0% 1995 (number of audits for which notices were submitted) Audits Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were 0 0% disclosed) Please Enter Yes or No Environmental management systems in place for one year or more 0% No Voluntary on-site compliance assessments conducted by the executive director 0% No under a special assistance program Other Participation in a voluntary pollution reduction program No 0% Early compliance with, or offer of a product that meets future state or federal No 0% government environmental requirements Adjustment Percentage (Subtotal 2) 10% >> Repeat Violator (Subtotal 3) N/A Adjustment Percentage (Subtotal 3) 0% >> Compliance History Person Classification (Subtotal 7) Satisfactory Performer Adjustment Percentage (Subtotal 7) 0% >> Compliance History Summary Compliance Enhancement for two NOVs with the same/similar violations. History Notes Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 10%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 10%

Docket No. 2015-1450-MLM-E

Policy Revi P

PCW 1 of 2

	Scre	ening Date	22-Sep-2015		Doc	:ket No. 2015-1450-MLM-E		PCW
			LASS WATER CO	OMPANY INC	200		Policy	Revision 4 (April 2014)
	(Case ID No.	51306				PCW F	Revision March 26, 2014
Reg.			RN104487335					
		a [Statute]	Water Rights Michaelle Garza					
		ation Number						
	, in the second s			in Codo 88 2	00 20(a) and	1 288 20(E)(P) and Tax Water C	ada 6	
		Rule Cite(s)	30 Tex. Admi	In. Code 99 2	11.12	d 288.30(5)(B) and Tex. Water C 72(c)	oae s	
	Violatio	n Description	Failed to ad			y plan which includes all element il public water supplier.	s for	
						Base	Penalty	\$5,000
>> En	vironme	ntal, Propei	ty and Huma		Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual		moderate				
		Potential				Percent 0.0%		
>>Pro	ogramma	tic Matrix Falsification	Major	Moderate	Minor			
			x			Percent 5.0%		
	Matrix Notes		1009	% of the rule	requirements	s were not met.		
						Adjustment	\$4,750	
							+ 1/7 00	
							l	\$250
Violati	ion Even	ts						
		Number of \	iolation Events	1	[83 Number of violation d	ays	
		mark only one with an x	daily weekly monthly quarterly semiannual			Violation Base	Penalty	\$250
			annual single event	x				
				One single e	vent is recor	nmended.		
Good P	Faith Eff	orts to Com	vlq	0.0%		R	eduction	\$0
			Be	efore NOE/NOV	NOE/NOV to EE	DPRP/Settlement Offer		
			Extraordinary					
			Ordinary	v	(mark with y)			
			N/A Notes			t meet the good faith criteria		
			L			Violation S	ubtotal	\$250
Fcono	mic Rene	fit (FR) for	this violatio	n		Statutory Limit	-	φ230
20010			_	••			_	
		Estimate	ed EB Amount		\$17	Violation Final Penal	y Total	\$275
				This viola	tion Final A	ssessed Penalty (adjusted for	limits)	\$275
							-	

	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.							
							Years of
	Water Rights					Percent Interest	Depreciation
Violation No.	1						
						5.0	15
	I tem Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
I tem Description	No commas or \$						
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)	\$360	1-Jul-2015	1-Jun-2016	0.92	\$17	n/a	\$17
Notes for DELAYED costs	p	lan, calculated fro	m the investig	ation d	ate to the estimate	nd adopt a drought ed date of complian	ce.
Avoided Costs	ANNUAL	ZE [1] avoided	costs before	-		for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Annual Cost of Compliance		¢24.0			TOTAL		¢ 1 7
Approx. Cost of Compliance	L	\$360			TOTAL	<u> </u>	\$17

								PCW 2 of 2	
		Pe	nalty (Calculatio	n Works	heet (PC	:\//)		
	Policy Revision 4 (A		nunty c				•	Revision March 26	5 2014
TCEQ	Toney Revision 4 (A	pm 2014)					10111		5, 2014
DATES	Assigned				-		9		
	PCW	3-Nov-2015	Screenin	22-Sep-2015	EPA Due				
RESPO	NDENT/FACILI	TY INFORMATI	ON						
		LASS WATER CC							
	g. Ent. Ref. No.								
Facili	ty/Site Region	4-Dallas/Fort Wo	orth		Major/N	Minor Source	Minor		
CASE I	NFORMATION								
	f./Case ID No.	51306			No.	of Violations	30		
		2015-1450-MLM				Order Type	¥		
Med	• • •	Public Water Sup	oply			t/Non-Profit	-		
	wutti-wedia	Water Rights			Enf.		Michaelle Garz Enforcement T		
Adr	nin. Penalty \$	Limit Minimum	\$50	Maximum	\$1,000	LU 3 TCall	LINGICEINCIL	cull 2	
					+ • / • • •				
			Pena	Ity Calcula	tion Section	on			
ΤΟΤΑ	L BASE PENA	ALTY (Sum of		-			Subtotal 1	\$7	7,240
		-		•					
ADJU	STMENTS (+	/-) TO SUBTO btained by multiplying	DTAL 1 The Total Base	e Penalty (Subtotal 1) by the indicated	nercentage			
	Compliance Hi			10.0%	Enhancement		tals 2, 3, & 7		\$724
	-						1		
	Notes	Enhancem	nent for two	NOVs with the s	ame/similar vio	olations.			
							J		
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Pe	snondont d	pes not meet the	culpability crite	oria			
	Notes	The Re	spondent u	bes not meet the		ena.			
							-		
	Good Faith Eff	ort to Comply T	otal Adjus	tments			Subtotal 5		\$0
	Economic Ben	efit		0.0%	Enhancement*		Subtotal 6		\$0
	Estimater	Total EB Amounts d Cost of Compliance	\$7,581 \$86,571	*Cappe	d at the Total EB \$	Amount			
	Latinated	Cost of compliance	\$80,571	1					
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$7	7,964
		AS JUSTICE N			7.6%		Adjustment		\$602
Reduces of	or enhances the Fina	I Subtotal by the indi					1		
	Notes	Enhancement to			•	ssociated with			
			violati	on nos. 1, 2, 5, a	and 25.				
						Final Per	nalty Amount	\$8	8,566
0T 4 TI									
STAIL		T ADJUSTMEN				Final Asse	ssed Penalty	\$8	8,609
DEFE					0.0%	Reduction	Adjustment		\$0
		enalty by the indicate	d percentage.	(Enter number only,			Aujustment		ΨŪ
	Notes	No	deferral is re	commended for	Findings Orders	S.			
							J		
DAVA	BLE PENALT	V						¢¢	8,609
FATA								3¢	5,009

Screening Date 22-Sep-2015 Docket No. 2015-1450-MLM-E

Respondent LASS WATER COMPANY INC

Case ID No. 51306

Reg. Ent. Reference No. RN104487335

Media [Statute] Public Water Supply

Enf. Coordinator Michaelle Garza

Compliance History Worksheet

	ory Site Enhancement (Subtotal 2)		
Component	Number of		Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	2	10%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
	Pl	ease Enter Yes or No	
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	2 0 ity (number of 0 cement orders or the federal he commission taining a denial judgments or judgments or 0 ton-adjudicated ty, of this state 0 ton-adjudicated ty, of this state 0 toth (number of 0 toth Legislature, 0 toth Safety Audit violations were 0 Please Enter Yes or No ecutive director No ecutive director No tate or federal No tate or federal No tjustment Percentage (Subit)	0%
	Adjustment Pe	rcentage (Sub	total 2)
Repeat Violator (Subtotal 3)		
N//	Adivaturant Da	rooptage / SL	total 2
N//	Adjustment Per	centage (Sub	
Compliance Histo	ory Person Classification (Subtotal 7)		
Satisfactory	Performer Adjustment Per	rcentage (Sub	total 7)
Compliance Histo	bry Summary		
Compliance	Enhancement for two NOVs with the same/similar violations		

History Notes

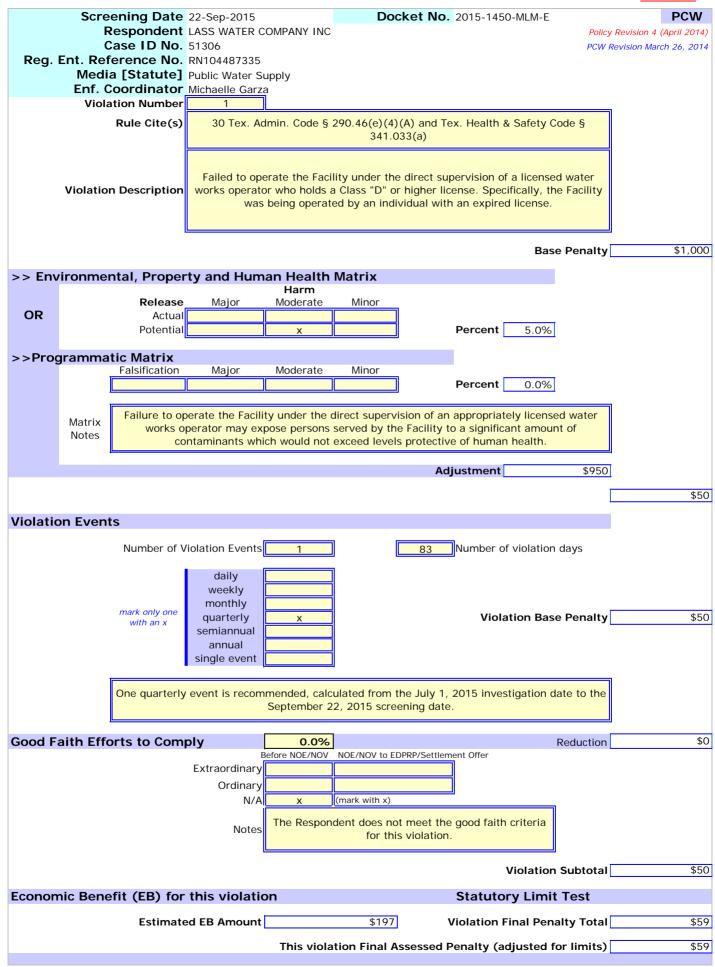
Enhancement for two NOVs with the same/similar violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 10%

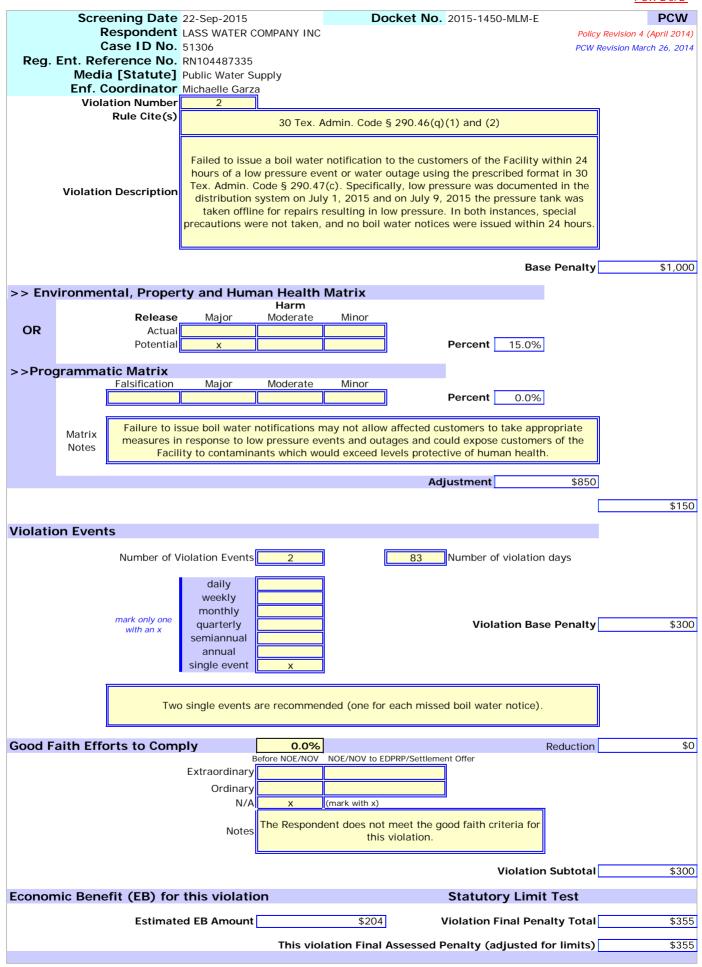
>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 10%

Policy Revision 4 (April 2014) PCW Revision March 26, 2014



	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.		i.					
	Public Water S						Years of
Violation No.		Supply				Percent Interest	Depreciation
violation No.	1						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
I tem Description	No commas or \$						
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)				0.00	\$0	n/a	\$0
Notes for DELAYED costs							
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enterii	ng item (except	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	\$186	1-Jul-2015	22-Sep-2015	1.15	\$11	\$186	\$197
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs					ated from the date	btain a Class "D" w of the investigatior	
Approx. Cost of Compliance		\$186			TOTAL		\$197



	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.	RN104487335						
	Public Water S						Years of
Violation No.		app.)				Percent Interest	Depreciation
violation no.	-					5.0	15
	Ltom Cost	Data Daguinad	Final Data	Vra	Interest Saved		EB Amount
		Date Required	Final Date	Irs	Interest Saved	Unetime costs	EB Amount
I tem Description	No commas or \$						
Delayed Costs	1				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	\$0 \$0
Land Record Keeping System				0.00	\$0 \$0	n/a n/a	\$0 \$0
Training/Sampling	\$100	1-Jul-2015	1-Apr-2016	0.00	\$0	n/a	\$0
Remediation/Disposal	\$100	1-Jui-2013	1-Api-2010	0.00	\$0	n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0 \$0
Other (as needed)				0.00	\$0	n/a	\$0 \$0
	The training	delayed cost incl	udes the estimation	ated ar	mount to develop a	and implement a wr	itten protocol
Notes for DELAYED costs	that is to b	e followed to ensu	ure boil water r	notifica	tions are issued to	customers in a tim	ely manner,
	Ca	alculated from the	date of the inv	/estgat	ion to the estimate	ed date of complian	ce.
						· · · ·	
Avoided Costs	ANNUAL	ZE [1] avoided	costs before (for one-time avoi	
Disposal				0.00	\$0	\$0	\$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	<u>\$0</u> \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance [2]				0.00	\$0	\$0	\$0 \$0
ONE-TIME avoided costs [3]	\$200	2-Jul-2015	10-Jul-2015	0.00	\$0	\$200	\$200
Other (as needed)	<u> </u>		10 301 2013	0.00	\$0	\$0	\$0
	-	JLJL		0.00	*0	**	**
Notes for AVOIDED costs	The avo					water notification ((\$100 per
NOTES TOT AVOIDED COSTS		notification	n), calculated for	or the c	dates the notification	ons were due.	
Approx. Cost of Compliance		\$300			TOTAL		\$204

					PCW 2 of 2
	Scre	ening Date	22-Sep-2015	Docket No. 2015-1450-MLM-E	PCW
	R	Respondent	LASS WATER COMPANY INC		Policy Revision 4 (April 2014)
		ase ID No.			PCW Revision March 26, 2014
Reg.		erence No.			
			Public Water Supply Michaelle Garza		
		ation Number			
	, ion	Rule Cite(s)		90.45(b)(1)(C)(i) and Tex. Health & Safety Code	<u>§</u>
				341.0315(c)	
				city of 0.6 gallons per minute ("gpm") per conne	
	Violatio	n Description		ons, the Facility is required to provide 49.2 gpm i	in well
			capacity; nowever, on	ly 16 gpm is provided which is a 67% deficiency.	
				Base Pe	enalty \$1,000
-	•				
>> En	vironmei	ntal, Proper	ty and Human Health Harm	Matrix	
		Release	Major Moderate	Minor	
OR		Actual			
		Potential	Х	Percent 15.0%	
>>Pro	aramma	tic Matrix			
	9	Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix			could result in low water pressure or outages that upply which would exceed levels protective of hun	
	Notes			health.	
				Adjustment	\$850
					\$150
VIOIATI	on Event	IS			
		Number of \	/iolation Events 3	83 Number of violation day	S
			daily		
			weekly monthly x		
		mark only one with an x	quarterly	Violation Base Pe	enalty \$450
		with an X	semiannual		
			annual		
			single event		
		T I			
		Inree monthly	·	Iculated from the July 1, 2015 investigation date 2, 2015 screening date.	to the
Good F	aith Effo	orts to Com	ply 0.0%	Red	uction \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary		
			N/A x	(mark with x)	
			Notes The Respond	ent does not meet the good faith criteria for	
				this violation.	
				Violation Sul	btotal \$450
Econo	mic Bene	efit (EB) for	this violation	Statutory Limit Te	st
		Estimate	ed EB Amount	\$5,270 Violation Final Penalty	Total \$532
				lation Final Assessed Penalty (adjusted for li	mits) \$532

PC	W	2	of	2	

	E	conomic	Benefit	Wo	rksheet		
Respondent		COMPANY INC					
Case ID No.	. 51306						
Reg. Ent. Reference No.	. RN104487335	5					
	Public Water S						Years of
Violation No.		sapp.j				Percent Interest	Depreciation
Violation No.	. 5					5.0	15
	Item Cost	Date Required	Final Date	Vrs	Interest Saved		EB Amount
		· · · · · · · · · · · · · · · · · · ·	Tillal Date	115	merest Saveu	Onetime costs	LD Amount
Item Description	No commas or \$						
Delayed Costs	s			_1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$60,000	1-Jul-2015	1-Oct-2016	1.25	\$251	\$5,019	\$5,270
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		the date of	the investigation	on to th	ne estimated date	um well capacity, c of compliance. for one-time avoir	
Avoided Costs Disposal			costs before	0.00	\$0	\$0	\$0
Personnel		┨━━━━━┤┟		0.00	\$0 \$0	\$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling		┨━━━━━┤┟		0.00	\$0	\$0	<u>\$0</u> \$0
Supplies/Equipment		╏━━━━━┤		0.00	\$0 \$0	\$0	\$0 \$0
Financial Assurance [2]		- <u> </u>		0.00	\$0	\$0	\$0 \$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
		<u></u>][][0.00		ψ0	<u>+0</u>
Notes for AVOIDED costs							

					PCW 2 of 2
		ening Date		Docket No. 2015-1450-MLM-E	PCW
			LASS WATER COMPANY INC		Policy Revision 4 (April 2014)
Peg		Case ID No. ference No.			PCW Revision March 26, 2014
Reg.			Public Water Supply		
	Enf. (Coordinator	Michaelle Garza		
	Viol	ation Number			
		Rule Cite(s)	30 Tex.	Admin. Code § 290.121(a) and (b)	
	Violatic	on Description	monitoring plan that ider frequency, and specifies the	naintain an up-to-date chemical and microbiological ntifies all sampling locations, describes the sampling analytical procedures and laboratories that the Faci omply with the monitoring requirements.	
				Base Pen	alty \$1,000
>> En	vironme	ntal, Prope	rty and Human Health	Matrix	
		· · · · ·	Harm		
OR		Release Actual		Minor	
		Potential		Percent 0.0%	
>> Pro	aramma	atic Matrix			
22110	granni	Falsification	Major Moderate	Minor	
			X	Percent 5.0%	
	Matrix Notes		100% of the rul	le requirement was not met.	
				Adjustment \$	950
					\$50
Violati	on Even	ts			
		Number of \	Violation Events 1	83 Number of violation days	
		mark only one with an x	daily weekly monthly quarterly semiannual annual single event <u>x</u>	Violation Base Pen	alty\$50
			One single	event is recommended.	
Good F	aith Eff	orts to Com			tion \$0
Good F	Faith Eff	orts to Com	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	tion \$C
Good F	aith Eff	orts to Com	Before NOE/NOV Extraordinary	4	tion \$C
Good F	Faith Eff	orts to Com	Before NOE/NOV Extraordinary Ordinary	NOE/NOV to EDPRP/Settlement Offer	tion \$C
Good F	Faith Eff	orts to Com	Before NOE/NOV Extraordinary Ordinary N/A x	4	tion \$C
Good F	aith Eff	orts to Com	Before NOE/NOV Extraordinary Ordinary N/A x The Respond	NOE/NOV to EDPRP/Settlement Offer	
			Before NOE/NOV Extraordinary Ordinary N/A x Notes	NOE/NOV to EDPRP/Settlement Offer (mark with x) dent does not meet the good faith criteria for this violation. Violation Subte	otal \$50
		efit (EB) for	Before NOE/NOV Extraordinary Ordinary N/A x Notes The Respond	NOE/NOV to EDPRP/Settlement Offer (mark with x) dent does not meet the good faith criteria for this violation. Violation Subte Statutory Limit Test	otal\$50
		efit (EB) for	Before NOE/NOV Extraordinary Ordinary N/A x Notes	NOE/NOV to EDPRP/Settlement Offer (mark with x) dent does not meet the good faith criteria for this violation. Violation Subte	otal \$50
		efit (EB) for	Extraordinary Ordinary Ordinary N/A x Notes The Respond this violation ed EB Amount	NOE/NOV to EDPRP/Settlement Offer (mark with x) dent does not meet the good faith criteria for this violation. Violation Subte Statutory Limit Test	otal \$50 t otal \$59

	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S						Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
I tem Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	-			0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	1-Jul-2015	1-Apr-2016	0.75	\$7	n/a	\$7
Notes for DELAYED costs		from the date	of the investig	ation to	o the estimated da	·	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before			for one-time avoi	
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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$180			TOTAL		\$7

							PCW 2 of 2
	Scre	ening Date	22-Sep-2015	Dock	et No. 2015-1450-MLM-E		PCW
			LASS WATER COMPANY INC				evision 4 (April 2014
Dee		Case ID No.				PCW Rev	ision March 26, 201
Reg.		ference No.	RN104487335 Public Water Supply				
			Michaelle Garza				
		ation Number					
		Rule Cite(s)	30 Tex. Adm	in. Code §§ 290.	46(q)(1) and 290.122(f)		
	Violatio	n Description		Specifically, a co		on that was	
					Ва	ise Penalty	\$1,000
>> Env	vironme	ntal, Proper	rty and Human Health	Matrix			
			Harm				
OR		Release Actual		Minor			
UR		Potential			Percent 0.09	6	
		i otoritidi	lI	1		0	
>>Pro	gramma	tic Matrix					
		Falsification	Major Moderate	Minor	Percent 5.0%	~	
			X		Percent 5.09	0	
	Matrix Notes		100% of the rule	e requirements w	vere not met.		
					Adjustment	\$950	
							<u> </u>
						L	\$50
Violati	on Event	ts					
		Number of \	/iolation Events 1]	83 Number of violatic	n days	
		mark only one with an x	daily weekly monthly quarterly semiannual annual single event x		Violation Ba	ise Penalty	\$50
			One single	event is recomm	nended.		
Good F	aith Effo	orts to Com	ply 0.0%	,		Reduction	\$(
			Before NOE/NOV	NOE/NOV to EDPRI	P/Settlement Offer		
			Extraordinary				
			Ordinary	(mark with x)			
			N/A <u>x</u>				
			Notes The Respon	dent does not me this vio	et the good faith criteria fo lation.	r	
			<u></u>		Violatio	on Subtotal	\$50
Econor	mic Bene	efit (EB) for	this violation		Statutory Lim	it Test	
		Estimate	ed EB Amount	\$9	Violation Final Pe	nalty Total	\$59
			This vio	plation Final As	sessed Penalty (adjusted	for limits)	\$59

	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		supply				Percent Interest	Depreciation
violation No.	5					5.0	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
I tem Description	No commas or \$						
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	\$100	1-Jul-2015	1-Apr-2016	0.75	\$4	n/a	\$4
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs		<u> </u>		0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	0					procedures to ensu	
Notes for DELAYED costs	of all boil wat		•			imely manner, calc	ulated from the
		date of th	e investigation	to the	estimated date of	compliance.	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before (enterii	ng item (except	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	\$5	31-Jul-2015	22-Sep-2015	1.06	\$0	\$5	\$5
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs					1 13	f a boil water notifi	
	Exe	cutive Director, ca	liculated from t	he date	e the notice was di	ue to the screening	date.
Approx. Cost of Compliance		\$105			TOTAL		\$9

		ening Date			Do	cket No. 2015-1450-M	_M-E	PCW
		Respondent Case ID No.	LASS WATER COMP	ANY INC			-	Revision 4 (April 2014)
Reg.		erence No.					PCWR	evision March 26, 2014
5	Medi	a [Statute]	Public Water Supply					
		Coordinator	Michaelle Garza					
	VIOIa	Rule Cite(s)	6	20 T	A design Con			
				30 Tex.	Admin. Coc	le § 290.41(c)(1)(F)		
	Violatio	n Description	Failed to obtain a sa			ent that covers the land w	ithin 150 feet of	
		••••		1	the Facility's	s active well.		
							Base Penalty	\$1,000
>> En	vironme	ntal, Proper	ty and Human H	lealth N	/latrix			
		Release		l arm derate	Minor			
OR		Actual			MITIO			
		Potential			х	Percent	3.0%	
>>Pro	ogramma	tic Matrix						
	· 9·	Falsification	Major Mo	derate	Minor			
						Percent	0.0%	
		Failure to ha	ave a sanitary contro	l easemer	nt in place c	ould allow activities to occ	ur next to the	
	Matrix	well which	could allow contamir	nation of t	he well, exp	oosing persons served by t	he Facility to	
	Notes	insignificar	it amounts of contain		nich would r man health.	not exceed levels that are	protective of	
						Adjustment	\$970	
							Γ	\$30
Violati	ion Event	ts						
			. . .		ſī			
		Number of V	iolation Events	1	l	83 Number of vic	lation days	
			daily					
			weekly					
		mark only one with an x	quarterly			Violation	n Base Penalty	\$30
		with an X	semiannual				-	
			annual single event	x				
			g	~				
			On	o singlo o	vent is reco	mmondod		
				e single e				
Good	Faith Eff	orts to Com	ply	0.0%			Reduction	\$0
60001					NOE/NOV to EE	PRP/Settlement Offer	Reduction	40
			Extraordinary					
			Ordinary N/A	X (I	mark with x)			
				<u> </u>				
			. I he	Responde		meet the good faith criter	la for	
			Notes			violation.		
			Notes				ation Subtotal	\$30
Econo	mic Bene	efit (EB) for	this violation					\$30
Econo	mic Bene		this violation			Vio Statutory I	_imit Test	\$30
Econo	mic Bene		this violation		\$1	Vio Statutory I	_imit Test	\$30 \$35 \$50

	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S						Years of
Violation No.		11.5				Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	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)	\$20	1-Jul-2015	1-Jun-2016	0.92	\$1	n/a	\$1
Notes for DELAYED costs	well	, calculated from t	he date of the	investi	gation to the estim	a sanitary control ea nated date of compl	iance.
Avoided Costs	ANNUAL	IZE [1] avoided	costs before (for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$20			TOTAL		\$1

	Scre	ening Date	22-Sep-2015	Docket No. 2015-1450-MLM-E	PCW
			LASS WATER COMPANY INC		Policy Revision 4 (April 2014)
Rea		Case ID No. ference No.			PCW Revision March 26, 2014
			Public Water Supply		
			Michaelle Garza		
	Viola	ation Number Rule Cite(s)	7		
		Rule Cite(S)	30 Te	x. Admin. Code § 290.41(c)(3)(O)	
	Violatio	n Description		ouse is locked during periods of darkness and when Specifically, the wellhouse lock was not functioning.	:he
				Base Per	alty \$1,000
>> En	vironme	ntal, Proper	ty and Human Health	n Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual			
		Potential	Х	Percent 15.0%	
>>Pro	ogramma	tic Matrix			
	- gi ai i i i a	Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix Notes	Failure to en		could expose customers of the Facility to contamina evels protective of human health.	nts
				Adjustment	\$850
					\$150
					\$130
Violati	ion Event	ts			
		Number of \	/iolation Events 3	83 Number of violation days	
			daily weekly		
		mark only one	monthly <u>x</u> quarterly	Violation Base Pen	alty \$450
		with an x	semiannual		
			annual		
			single event		
		Three monthly		alculated from the July 1, 2015 investigation date to 22, 2015 screening date.	the
Good	Faith Fff	orts to Com	ply 0.0%	Reduc	tion \$0
			Before NOE/NOV		
			Extraordinary		
			Ordinary N/A x	(mark with x)	
				dent does not meet the good faith criteria for this violation.	
				Violation Sub	
Econo	mic Bene	efit (EB) for	this violation	Statutory Limit Tes	t
		Estimate	ed EB Amount	\$2 Violation Final Penalty T	otal \$532
			This vi	olation Final Assessed Penalty (adjusted for lin	nits) \$532

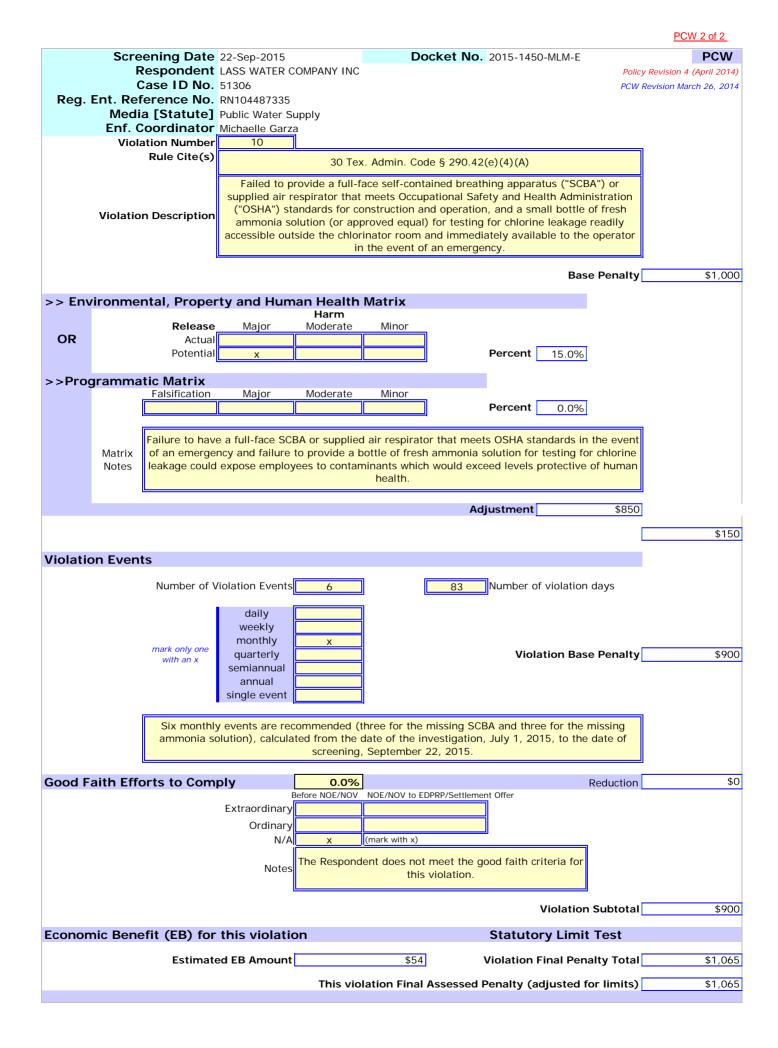
	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S					D	Years of
Violation No.	7					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		•					
item Bescription							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	-			0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$50	1-Jul-2015	1-Apr-2016	0.75	\$2	n/a	\$2
Notes for DELAYED costs		the date of	the investigation	on to tl	ne estimated date	•	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before e			for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$50			TOTAL		\$2

							PCW 2 of 2
			22-Sep-2015		ket No. 2015-1450-MLM-E		PCW
			LASS WATER COMPANY INC			Policy Re	vision 4 (April 2014,
-		e ID No.				PCW Revi	sion March 26, 2014
Reg.			RN104487335				
	-	_	Public Water Supply Michaelle Garza				
		n Number					
		le Cite(s)		Admin Cada	5 200 41(a)(2)(D)		
			30 Te	k. Admin. Code	§ 290.41(c)(3)(P)		
	Violation De	escription	Specifically, there was no r	oad leading to	road to the Facility's active we the well site which is situated d trees that sits in the middle o se.	northeast	
					Base	e Penalty	\$1,000
>> Fn\	vironmenta	l Proper	ty and Human Health	Matrix			
		.,	Harm	Matrix			
~		Release	Major Moderate	Minor			
OR		Actual			Demonst		
		Potential		X	Percent 3.0%		
>>Pro	grammatic	Matrix					
		Isification	Major Moderate	Minor			
					Percent 0.0%		
	Matrix F	ailure to ha	ave an all-weather access roa	ad to the well s	ite could make it difficult to ac	cess the	
	Matrix Notes				the Facility to be exposed to in		
	Notes	amoun	ts of contaminants that woul	d not exceed le	evels protective of human heal	th.	
					Adjustment	\$970	
							\$30
الماحة	on Frants						
violatio	on Events						
	N	lumber of V	/iolation Events 1		83 Number of violation	days	
				u 1998 1		-	
			daily				
			weekly				
		ark only one	monthly quarterly		Violation Base	Penalty	\$30
		with an x	semiannual				\$3C
			annual				
			single event x				
	1			-			
			One cineta	overt is record	monded		
			One single	event is recom			
Good F	aith Efforts	to Com				Reduction	\$C
			Before NOE/NOV	NOE/NOV to EDP	RP/Settlement Offer		
			Extraordinary				
			Ordinary	(mark with y)			
			N/A <mark>x</mark>	(mark with x)			
			Notes The Respond		neet the good faith criteria for		
				this v	iolation.		
			L				
					Violation	Subtotal	\$30
Econor	nic Benefit	(EB) for	this violation		Statutory Limit	Test	
		Estimate	ed EB Amount	\$64	Violation Final Pena	alty Total	\$35
		Estimate			Violation Final Pena ssessed Penalty (adjusted fo		\$35

	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.		5					
	Public Water S						Years of
Violation No.		зарріу				Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)	\$1,000	1-Jul-2015	1-Jun-2016	0.92	\$3	\$61	\$64
Engineering/Construction	\$1,000	1 301 2013	1 3011 2010	0.00	\$0	\$0	<u>\$0</u>
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	ca	alculated from the	date of the inv	/estigat	ion to the estimate	ther access road to ed date of complian for one-time avoid	ce.
Disposal			costs before	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	<u>\$0</u> \$0
Supplies/Equipment				0.00	\$0	\$0	<u>\$0</u> \$0
Financial Assurance [2]				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
ONE-TIME avoided costs [3]				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs		<u></u>			· • • • •		
Approx. Cost of Compliance		\$1,000			TOTAL		

					PCW 2 of 2
	Scree	ening Date	22-Sep-2015	Docket No. 2015-1450-MLM-E	PCW
			LASS WATER COMPANY INC		Policy Revision 4 (April 2014)
Dee		ase ID No.	51306 RN104487335		PCW Revision March 26, 2014
Reg.			Public Water Supply		
			Michaelle Garza		
	Viola	tion Number	9		
		Rule Cite(s)	30 Te	x. Admin. Code § 290.42(a)(3)	
	Violatior	Description	accessible by an all-weat	e water treatment plant is located at a site that is her road. Specifically, the water treatment plant g through an undeveloped grassy lot and across a course fairway.	<mark>is -</mark>
				Base Pe	nalty \$1,000
>> En	vironmer	ntal, Proper	ty and Human Health I	Matrix	
		· · ·	Harm		
OR		Release Actual	Major Moderate	Minor	
OR		Potential		x Percent 3.0%	
>>Pro	grammat	t ic Matrix Falsification	Major Moderate	Minor	
	l l	Faisincation	Major Moderate	Percent 0.0%	
		Failure to ha	ve an all-weather access road	could make it difficult to access the plant in adv	erse
	Matrix Notes	weather con	ditions causing customers of t	he Facility to be exposed to insignificant amount xceed levels protective of human health.	
				Adjustment	\$970
					\$30
Violati	ion Event	s			
		Number of V	iolation Events 1	83 Number of violation days	5
		mark only one with an x	daily weekly monthly quarterly semiannual annual single event x	Violation Base Pe	nalty \$30
			One single e	event is recommended.	
Good F	Faith Effo	rts to Com	Before NOE/NOV Extraordinary Ordinary	Redu NOE/NOV to EDPRP/Settlement Offer (mark with x)	sction \$0
			Notes The Responde	ent does not meet the good faith criteria for this violation.	
				Violation Sub	stotal \$30
Econo	mic Bene	fit (EB) for	this violation	Statutory Limit Te	st
		Fstimate	ed EB Amount	\$64 Violation Final Penalty	Total \$35
		Loundt			
			This viola	tion Final Assessed Penalty (adjusted for lin	mits) \$50

	E	conomic l	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.		:					
							Veene ef
	Public Water S	supply				Percent Interest	Years of
Violation No.	. 9						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
Ttem Description	No commas or \$						
Delayed Costs	;				n		
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$1,000	1-Jul-2015	1-Jun-2016	0.92	\$3	\$61	\$64
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	Ca	alculated from the	date of the inv	vestigat	ion to the estimate	eather access road t ed date of complian for one-time avoid	ce.
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$0 \$0	<u>\$0</u> \$0
				0.00	\$0	\$0 \$0	ΨŪ
Financial Assurance [2]							0\$
Financial Assurance [2]					0.2		\$0 \$0
ONE-TIME avoided costs [3]				0.00	\$0 \$0	\$0	\$0
					\$0 \$0		
ONE-TIME avoided costs [3]				0.00		\$0	\$0



PC	W	2	of	2	

Economic Benefit Worksheet							
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S						Years of
Violation No.		Jappiy				Percent Interest	Depreciation
						5.0	15
	Ltem Cost	Date Required	Final Date	Vrs	Interest Saved	Onetime Costs	EB Amount
Itom Decerintion		•	Think Duto		interest ourou		LD / Infount
Item Description	No commas or \$						
Delayed Costs		11.		n			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$1,025	1-Jul-2015	1-Apr-2016	0.75	\$3	\$51	\$54
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	bottle of fre	sh ammonia solut	ion (\$25), calci dat	ulated e of co	from the date of th mpliance.	e SCBA (\$1,000) a ne investigation to t	he estimated
Avoided Costs	ANNUAL	IZE [1] avoided	costs before e	enterii	ng item (except i	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,025			TOTAL		\$54

					PCW 2 of 2
		ening Date		Docket No. 2015-1450-MLM-E	PCW
			LASS WATER COMPANY INC		licy Revision 4 (April 2014,
Rea. F		Case ID No. Terence No.		PC	W Revision March 26, 2014
···· j· -	Medi	a [Statute]	Public Water Supply		
			Michaelle Garza		
	Viola	ation Number Rule Cite(s)			
			30 Te>	. Admin. Code § 290.42(e)(4)(B)	
	Violatio	n Description	in separate buildings or separating all mechanical a the top of the chlorine room	or gas chlorination equipment and cylinders of chlorin separate rooms with impervious walls or partitions nd electrical equipment from the chlorine. Specifically was open to the inner atmosphere of the pump hous e chlorination equipment is located.	
				Base Penal	ty \$1,000
>> Envir	ronme	ntal, Proper	ty and Human Health	Matrix	
		Release	Harm Maior Moderate	Minor	
OR		Actual	Major Moderate		
		Potential	X	Percent 15.0%	
>>Progr	amma	tic Matrix			
, i i ogi	annia	Falsification	Major Moderate	Minor	
				Percent 0.0%	
		Failure to r	naintain the chlorination equi	pment and chlorine cylinders in separate rooms with	
	Matrix Notes		alls could expose employees t	o contaminants which would exceed levels protective uman health.	of
				Adjustment \$8	50
					\$150
					\$150
Violatior	n Event	ts			
		Number of \	/iolation Events 3	83 Number of violation days	
			daily daily weekly		
		mark only one	monthly x	Violation Dass Dans	φ
		with an x	quarterly semiannual	Violation Base Penal	ty \$450
			annual		
			single event		
		Three mont	5	calculated from the date of the investigation, July 1, screening, September 22, 2015.	
Good Fai	ith Effo	orts to Com		Reduction	on \$0
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A x	(mark with x)	
			Notes The Respond	ent does not meet the good faith criteria for this violation.	
			(<u></u>	Violation Subtot	al \$450
Economi	c Bene	efit (EB) for	this violation	Statutory Limit Test	
			ed EB Amount	\$29 Violation Final Penalty Tot	al \$532
		Lotindu			
			This vio	lation Final Assessed Penalty (adjusted for limit	s) \$532

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	E	conomic	Benefit	Wo	rksheet		
Respondent		COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.	RN104487335	5					
Media Violation No.	Public Water S	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Vrs	Interest Saved		EB Amount
Item Deserintion		•	T mar Bate	115	Interest Savea	Onetime obsta	LD Amount
I tem Description	No commas or \$						
Delayed Costs	;			1			
Equipment				0.00	\$0	\$0	\$0
Buildings	.		4.14. 0041	0.00	\$0	\$0	\$0
Other (as needed)	\$500	1-Jul-2015	1-May-2016	0.84	\$1	\$28	\$29
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 Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs		· ·	the estima	ted dat	te of compliance.	m the date of the in	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before e	enterir	ng item (except	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
					\$0	\$0	ΨU
ONE-TIME avoided costs [3]				0.00			\$0
				0.00	\$0	\$0	
ONE-TIME avoided costs [3]							\$0

Sci	reening Date		Docket	t No. 2015-1450-MLM-E	PCW
	Respondent Case ID No.	LASS WATER COMPANY INC			Policy Revision 4 (April 2014)
Reg Ent R	eference No.				PCW Revision March 26, 2014
-		Public Water Supply			
	Coordinator				
	V12				
	Rule Cite(s)	30 Tex	k. Admin. Code § 2	90.42(e)(4)(C)	
Violat	ion Description	screened vents for all en	closures in which cl	includes high level and floor I hlorine gas is being stored or s in the chlorine room.	
				Base P	enalty \$1,000
>> Environm	ental, Prope	rty and Human Health	Matrix		
		Harm			
OR	Release		Minor		
OR	Actual Potential			Percent 15.0%	
	rotentia	^	I <u></u> _]		
>>Programm					
	Falsification	Major Moderate	Minor	Demonst 0.000	
				Percent 0.0%	
Matrix Notes			employees to cont ve of human health	aminants which would exceed n.	levels
	<u> </u>				
				Adjustment	\$850
					\$150
Violation Eve	nto				
VIOIATION EVE	1115				
	Number of V	Violation Events 3	8	33 Number of violation day	ys
	mark only one with an x	daily weekly monthly x quarterly semiannual		Violation Base P	enalty \$450
		annual single event			
			<u>I</u>		
	Three mont	hly events are recommended 2015, to the date of		ne date of the investigation, Ju aber 22, 2015.	<mark>ily 1,</mark>
Good Faith Ef	fforts to Com	ply 0.0%		Por	duction \$0
		Before NOE/NOV	NOE/NOV to EDPRP/Se		
		Extraordinary			
		Ordinary			
		N/A <u>x</u> Notes The Respond	(mark with x) lent does not meet this violat	the good faith criteria for	
				Violation Su	ibtotal \$450
Economic Ber	nefit (EB) for	this violation		Statutory Limit T	est
	Estimat	ed EB Amount	\$58	Violation Final Penalt	y Total \$532
		This via	lation Final Accor	seed Donalty (adjusted for	limits) \$532
			nation Final ASSes	ssed Penalty (adjusted for	۵۵32 a

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	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		зарргу				Percent Interest	Depreciation
						5.0	15
	Itom Cost	Date Required	Final Date	Yrs	Interest Saved		EB Amount
		Date Required	Final Date	115	Interest Saveu	Unetime costs	ED AMOUNT
Item Description	No commas or \$						
Delayed Costs				-	-		
Equipment	\$1,000	1-Jul-2015	1-May-2016	0.84	\$3	\$56	\$58
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	chlorine r	oom, calculated fr	rom the date of	f the in	vestigation to the	d floor level screene estimated date of c	ompliance.
Avoided Costs		ZE [1] avoided	costs before			for one-time avoi	
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	<u>\$0</u> \$0	\$0 \$0
Financial Assurance [2]				0.00	\$0		\$0 \$0
ONE-TIME avoided costs [3] Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Notes for AVOIDED costs		<u>JI</u>		<u> 0.00</u>	Ţ⊅U	\$0	<u>\$0</u>
Approx. Cost of Compliance		\$1,000			TOTAL		\$58

	Scre	ening Date	22-Sep-2015	Docket No. 2015-1450-MLM-E	PCW
			LASS WATER COMPANY INC		Policy Revision 4 (April 2014)
Peg		Case ID No.	51306 RN104487335		PCW Revision March 26, 2014
Reg.			Public Water Supply		
	Enf. C	Coordinator	Michaelle Garza		
	Viola	ation Number Rule Cite(s)			
		Rule Cite(S)	30	Tex. Admin. Code § 290.42(I)	
	Violatio	n Description		ain a thorough and up-to-date plant operations ma operator review and reference.	anual
				Base Pe	enalty \$1,000
>> En	vironme	ntal, Propei	rty and Human Health	Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual			
		Potential		Percent 0.0%	
>>Pro	ogramma	tic Matrix			
		Falsification	Major Moderate	Minor Percent 5.0%	
			X		
	Matrix Notes		100% of the rul	le requirement was not met.	
				Adjustment	\$950
					\$50
					\$
Violati	ion Even	ts			
		Number of \	/iolation Events 1	83 Number of violation days	ŝ
		mark only one	daily weekly monthly quarterly	Violation Base Pe	enalty \$50
		with an x	semiannual		nary 50
			One single	event is recommended.	
Good I	Faith Effe	orts to Com			uction \$C
			Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A x	(mark with x)	
			Notes The Respond	lent does not meet the good faith criteria for this violation.	
				Violation Sub	stotal \$50
Econo	mic Bene	efit (EB) for	this violation	Statutory Limit Te	st
		Estimate	ed EB Amount	\$8 Violation Final Penalty	Total \$59
			This vio	lation Final Assessed Penalty (adjusted for li	mits) \$59
			1113 110	and a source of the second s	

	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S						Years of
Violation No.		11.5				Percent Interest	Depreciation
						5.0	
	Itom Cost	Date Required	Final Date	Vrc	Interest Saved		EB Amount
Harry Description		•	T mar Date	115	Interest Saveu	Unetime costs	LD Amount
I tem Description	No commas or \$						
Delayed Costs	r				* 0	* •	* 0
Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Buildings Other (as needed)				0.00	\$0 \$0	\$0	\$0 \$0
Engineering/Construction				0.00	\$0 \$0	\$0	\$0 \$0
Land				0.00	\$0	n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0 \$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	1-Jul-2015	1-May-2016	0.84	\$8	n/a	\$8
Notes for DELAYED costs	r	manual, calculated	from the date	of the	investigation to th	e and maintain a pla e date of compliance	ce.
Avoided Costs	ANNUAL	IZE [1] avoided	costs before (for one-time avoi	
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 \$0	\$0 \$0
Financial Assurance [2] ONE-TIME avoided costs [3]				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Notes for AVOIDED costs		<u>JI</u>		<u> 0.00</u>	1 - 20	50	<u>+0</u>
Approx. Cost of Compliance		\$180			TOTAL		\$8

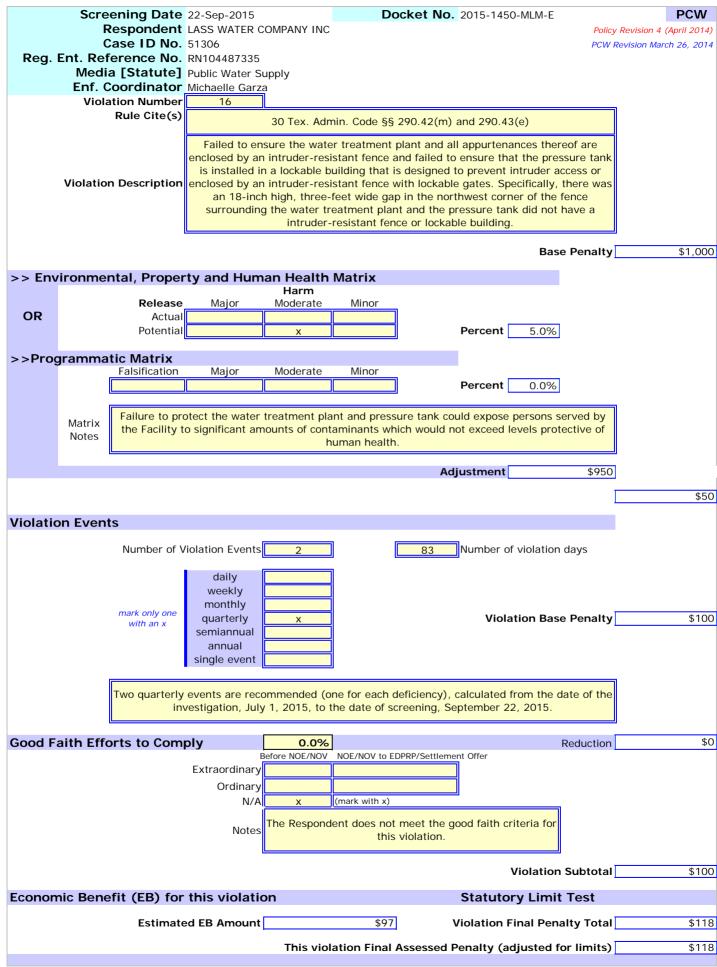
Screening Date 22-Sep-2015 Docket No. 2015-1450-MLM-E PCW Respondent LASS WATER COMPANY INC Policy Revision 4 (April 2014) Case ID No. 51306 PCW Revision March 26, 2014 Reg. Ent. Reference No. RN104487335 Media [Statute] Public Water Supply Enf. Coordinator Michaelle Garza Violation Number 14 Rule Cite(s) 30 Tex. Admin. Code § 290.43(d)(1) Failed to provide a pressure tank of 1,000 gallons or larger that meets American Society of Mechanical Engineers ("ASME") Section VIII, Division 1 Codes and Violation Description Construction Regulations, and which is provided with the required ASME name plate. Specifically, no ASME name plate was attached to the pressure tank. Base Penalty \$1,000 >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor OR Actual Potential Percent 5.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Failure to have an approved pressure tank could expose customers of the Facility to significant Matrix Notes amounts of contaminants which would not exceed levels protective of human health. Adjustment \$950 \$50 **Violation Events** Number of Violation Events 83 Number of violation days daily weeklv monthly mark only one Violation Base Penalty \$50 quarterly with an x semiannual annual single event One quarterly event is recommended, calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A х (mark with x) The Respondent does not meet the good faith criteria for Notes this violation Violation Subtotal \$50 Economic Benefit (EB) for this violation **Statutory Limit Test** Estimated EB Amount \$821 Violation Final Penalty Total \$59 \$59 This violation Final Assessed Penalty (adjusted for limits)

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	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	. 51306						
Reg. Ent. Reference No.	RN104487335						
	Public Water S					_	Years of
Violation No.						Percent Interest	Depreciation
violation ito:						5.0	1
	Item Cost	Date Required	Final Date	Vrs	Interest Saved		EB Amount
		Date Required	That Date	113	Interest Saved	Offetime costs	LD Amoun
Item Description	No commas or \$						
Delayed Costs	; 			7			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$10,000	1-Jul-2015	1-Sep-2016	1.17	\$39	\$782	\$821
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		ate, calculated fro				ved pressure tank v	
Avaided Cente		IZE [1] ovoidod					mpliance.
Avoided Costs		IZE [1] avoided		enterii	ng item (except i	for one-time avoi	mpliance. ded costs)
Disposal	; ANNUAL	IZE [1] avoided		enterii 0.00	ng item (except 1 \$0	for one-time avoid \$0	mpliance. ded costs) \$0
Disposal Personnel	; ANNUAL	IZE [1] avoided		enterii 0.00 0.00	ng item (except 1 \$0 \$0	for one-time avoid \$0 \$0	mpliance. ded costs) \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling	; ANNUAL	IZE [1] avoided		nteri 0.00 0.00 0.00	ng item (except 1 \$0 \$0 \$0 \$0	for one-time avoi \$0 \$0 \$0	mpliance. ded costs) \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	ANNUAL	IZE [1] avoided		nterii 0.00 0.00 0.00 0.00	ng item (except t \$0 \$0 \$0 \$0 \$0	for one-time avoi \$0 \$0 \$0 \$0	mpliance. ded costs) \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	ANNUAL	IZE [1] avoided		0.00 0.00 0.00 0.00 0.00 0.00	ng item (except f \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	mpliance. ded costs) \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	ANNUAL	IZE [1] avoided		nterii 0.00 0.00 0.00 0.00	ng item (except t \$0 \$0 \$0 \$0 \$0	for one-time avoi \$0 \$0 \$0 \$0	mpliance. ded costs) \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	S ANNUAL	IZE [1] avoided		0.00 0.00 0.00 0.00 0.00 0.00 0.00	ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	mpliance. ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

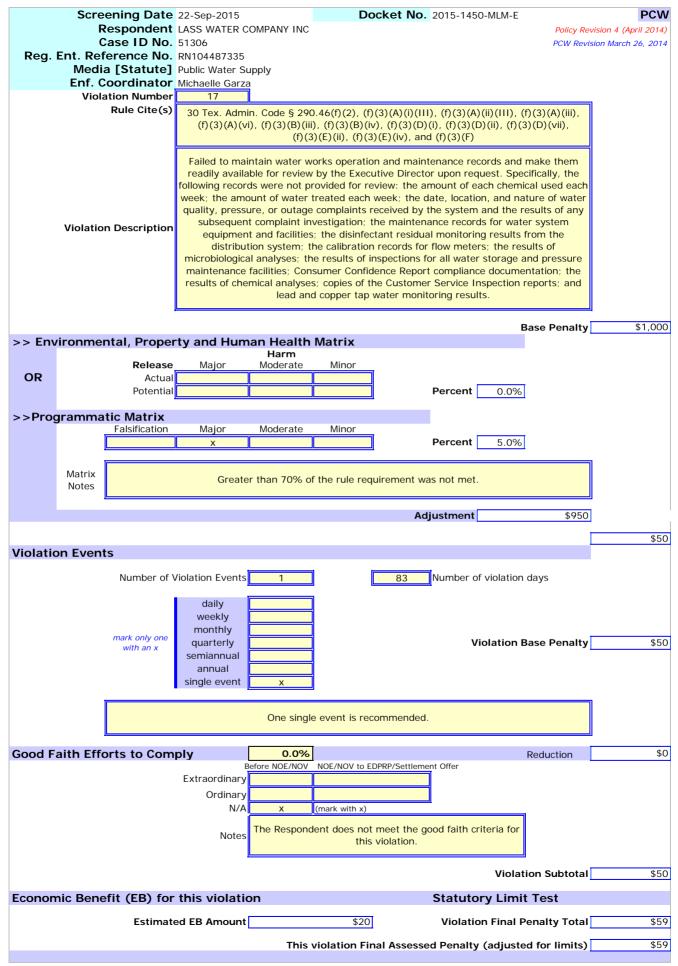
	Screening Date		Docket No. 2015-1450-MLM-E	PCW
	Case ID No.	LASS WATER COMPANY INC		Revision 4 (April 2014)
Rea. Ent	t. Reference No.		PCWT	Revision March 26, 2014
-	Media [Statute]			
	Enf. Coordinator	Michaelle Garza		
	Violation Number			1
	Rule Cite(s)	30 1	Tex. Admin. Code § 290.43(d)(3)	
Vie	olation Description		to readily determine air-water-volume for the pressure essure tank sight glass was ruptured and disconnected.	
		······		
			Base Penalty	\$1,000
>> Enviro	onmental, Prope	rty and Human Health _{Harm}	n Matrix	
	Release		Minor	
OR	Actual			
	Potential	X	Percent 5.0%	
>>Progra	mmatic Matrix			
J	Falsification	Major Moderate	Minor	
			Percent 0.0%	
М			a device to determine air-water-volume may not allow an adequate air-water volume which could result in	
			to significant amounts of contaminants which would not	
		exceed levels	protective of human health.	
				1
			Adjustment \$950	
				\$50
Violation I	Evonte			
VIOIATION	Events			
	Number of \	/iolation Events 1	83 Number of violation days	
		daily		
		daily weekly	-	
		monthly		
	mark only one with an x	quarterly x	Violation Base Penalty	\$50
		semiannual	_	
		annual single event	-	
	One guarterly	vevent is recommended, cal	culated from the date of the investigation, July 1, 2015,	
			creening, September 22, 2015.	
				l
Good Faith	h Efforts to Com			\$0
		Before NOE/NOV	/ NOE/NOV to EDPRP/Settlement Offer	
		Ordinary		
		N/A x	(mark with x)	
			dent does not meet the good faith criteria for	
		Notes The Respon		
		Notes	this violation.	
		Notes	this violation.	\$50
		Notes	this violation. Violation Subtotal	\$50
Economic	Benefit (EB) for	Notes	this violation.	\$50
Economic		Notes	this violation. Violation Subtotal	
Economic		this violation	this violation. Violation Subtotal Statutory Limit Test	

	E	conomic l	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.		,					
	Public Water S						Years of
		supply				Percent Interest	
Violation No.	15						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delaved Costs							
Equipment	I	1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$50	1-Jul-2015	1-May-2016	0.84	\$0	\$3	\$3
Engineering/Construction	\$30	1-Jui-2015	1-11/10/2010	0.04	\$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	determine tl	ne air-water-volun	ne, calculated f	rom th compli	e date of the inves iance.	e tank with a functions to the esting	mated date of
Avoided Costs	ANNUAL	ZE [1] avoided	costs before e			for one-time avoi	
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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$50			TOTAL		\$3



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	E	conomic	Benefit	Wo	rksheet		
Respondent		COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.	Public Water S	Supply				Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		•					
i tem Description							
Delayed Casta							
Delayed Costs		- <u> </u>			¢0	¢0	¢0
Equipment				0.00	\$0	\$0	\$0
Buildings	¢1 500	1 1 1 0015	1 001/	0.00	\$0	\$0	\$0
Other (as needed)	\$1,500	1-Jul-2015	<u>1-Jun-2016</u>	0.92	\$5	\$92	\$97
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 Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs	2	pressure tank with	an intruder-re	sistant		reatment plant fenc building (\$1000), c of compliance.	• •
Avoided Costs	ANNUAL		9			for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$97



	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.							
							Years of
Violation No.	Public Water S	suppry				Percent Interest	Depreciation
violation No.	17					5.0	15
	14 0 t	Data Daminad	Einel Date	Var	Independent Coursed		-
		Date Required	Final Date	Irs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
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	\$540	1-Jul-2015	1-Apr-2016	0.75	\$20	n/a	\$20
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Kernediation/ Disposal				0.00	ΨŪ	n/a	ΨŪ
Permit Costs				0.00	\$0 \$0	n/a	\$0
· · · · ·	The delayed	cost includes the	estimated amo	0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 ount to om the compli	\$0 \$0 compile and begin date of the invest ance.	n/a n/a maintaining the m igation to the estim	\$0 \$0 issing records lated date of
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 ount to om the compli	\$0 \$0 compile and begin date of the invest ance. ng item (except f	n/a n/a maintaining the m igation to the estim for one-time avoi	\$0 \$0 issing records lated date of ded costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 ount to om the compli enterin 0.00	\$0 \$0 compile and begin date of the invest ance. ng item (except f \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0	\$0 \$0 issing records hated date of ded costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 0 0.00 0 0.00 0.00 0.00	\$0 \$0 compile and begin date of the invest ance. ng item (except f \$0 \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0 \$0	\$0 \$0 issing records hated date of ded costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 0 0.00 0 0.00 0.00 0.00 0.00	\$0 \$0 compile and begin date of the invest ance. ng item (except 1 \$0 \$0 \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0 \$0 \$0	\$0 \$0 issing records hated date of ded costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 0 0.00 0 0 0 0 0 0 0 0.00 0.0	\$0 \$0 compile and begin date of the invest ance. ng item (except 1 \$0 \$0 \$0 \$0 \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0 \$0 \$0 \$0	\$0 \$0 issing records hated date of ded costs) \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 compile and begin date of the invest ance. ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 issing records hated date of ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 compile and begin date of the invest ance. ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 issing records ated date of ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 compile and begin date of the invest ance. ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 issing records hated date of ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	(\$45 per re	ecord x 12 records), calculated fr	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 compile and begin date of the invest ance. ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a maintaining the m igation to the estim for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 issing records ated date of ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

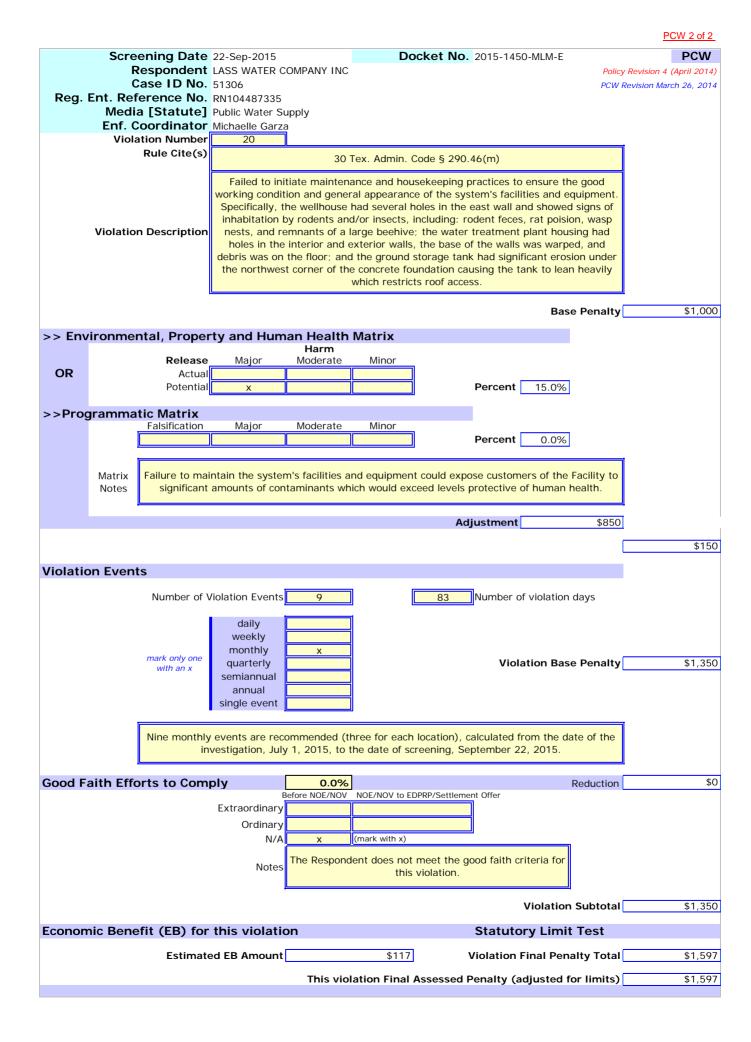
	Scre	ening Date	22-Sep-2015	Docket No. 2015-1450-MLM-E	PCW
	R	Respondent	LASS WATER COMPANY INC	Polic	cy Revision 4 (April 2014)
Dog		Case ID No.		PCW	Revision March 26, 2014
Rey.		erence No. a [Statute]	Public Water Supply		
			Michaelle Garza		
	Viola	ation Number	18		=1
		Rule Cite(s)	30	Tex. Admin. Code § 290.46(h)	
	Violatio	n Description	Failed to maintain a supply	y of calcium hypochlorite on hand for use when making repairs.	
				Base Penalty	\$1,000
>> En	vironme	ntal, Proper	ty and Human Health	Matrix	
		Release	Harm		
OR		Release Actual	Major Moderate	Minor	
		Potential		Percent 5.0%	
_					
>>Pro	ogramma	tic Matrix Falsification	Major Moderate	Minor	
				Percent 0.0%	
					7
	Matrix			on hand could prevent proper disinfection after repairs	
	Notes	and expose		significant amounts of contaminants which would not protective of human health.	
				Adjustment \$950	
					\$50
					\$50
Violati	ion Event	ts			
		Number of \	/iolation Events 1	83 Number of violation days	
			daily weekly monthly		
		mark only one with an x	quarterly x semiannual	Violation Base Penalty	/ \$50
		One quarterly		culated from the date of the investigation, July 1, 2015, reening, September 22, 2015.	
Good I	Faith Effe	orts to Com	ply 0.0%	Reduction	\$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary N/A x	(mark with x)	
				dent does not meet the good faith criteria for this violation.	
				Violation Subtota	\$50
Econo	mic Bene	efit (EB) for	this violation	Statutory Limit Test	
Econo	mic Bene				\$59
Econo	mic Bene		ed EB Amount	Statutory Limit Test \$5 Violation Final Penalty Tota blation Final Assessed Penalty (adjusted for limits)	

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	E	conomic l	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335						
	Public Water S						Years of
Violation No.		11.5				Percent Interest	Depreciation
						5.0	
	Item Cost	Date Required	Final Date	Vrs	Interest Saved		EB Amount
Item Decerintion		•	That Date	113	Interest Savea	Onetime costs	LD Amount
I tem Description	No commas or \$						
Delayed Costs				1			+ -
Equipment	\$100	1-Jul-2015	1-Apr-2016	0.75	\$0	\$5	\$5
Buildings				0.00	\$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction Land				0.00	\$0 \$0	 	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0 \$0
Training/Sampling				0.00	\$0 \$0	n/a	\$0 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0 \$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs		from the date	of the investig	ation to	o the estimated da	•	
Avoided Costs	ANNUAL	ZE [1] avoided	costs before			for one-time avoi	
Disposal				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance [2]				0.00	\$0 \$0	\$0	\$0 \$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0 \$0
Notes for AVOIDED costs		JI		10.00	μ		
Approx. Cost of Compliance		\$100			TOTAL		\$5

	Scro	ening Date	22 Sop 2015	Docket No. 2015-1450-MLM		PCW
			LASS WATER COMPANY INC	DOCKET NO. 2015-1450-MEM		Revision 4 (April 2014)
		ase ID No.				Revision March 26, 2014
Reg.	Ent. Refe	erence No.	RN104487335			
			Public Water Supply			
			Michaelle Garza			
	Viola	tion Number	19			
		Rule Cite(s)	30	Tex. Admin. Code § 290.46(i)		
	Violatior	n Description	with provisions for proper er	plumbing ordinance, regulations, or servi forcement to ensure that neither cross-co ptable plumbing practices are permitted.		
					Base Penalty	\$1,000
>> Env	vironmen	ntal, Proper	ty and Human Health	Matrix		
			Harm			
OR		Release Actual	Major Moderate	Minor		
UK		Potential		Percent 0.0	0%	
		i otoritidi	I <u></u> I			
>>Pro	grammat	tic Matrix				
	6	Falsification	Major Moderate	Minor Percent 5.0	201	
	L		X		0%	
	Matrix Notes		100% of the ru	e requirement was not met.		
				Adjustment	\$950	
						*--
					l	\$50
Violati	ion Event	s				
		Number of \	/iolation Events 1	83 Number of viola	tion days	
		mark only one with an x	daily weekly monthly quarterly semiannual annual	Violation	Base Penalty	\$50
			single event x			
			One single	event is recommended.		
Good F	Faith Effo	rts to Com	ply 0.0%		Reduction	\$C
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
			Extraordinary			
			Ordinary			
			N/A x Notes The Respond	(mark with x) lent does not meet the good faith criteria	for	
				this violation.		
				Viola	tion Subtotal	\$50
Econor	mic Bene	fit (EB) for	this violation	Statutory Li	mit Test	
		Estimate	ed EB Amount	\$8 Violation Final I	Penalty Total	\$59
				lation Final Assessed Penalty (adjust		\$59
				ation Final Assessed Penalty (adjust)		A C¢

	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S					Percent Interest	Years of Depreciation
violation No.	17					F 0	
						5.0	
		Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
I tem Description	No commas or \$						
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$180	1-Jul-2015	1-Jun-2016	0.92	\$8	n/a	\$8
Notes for DELAYED costs	or service ag	reement, calculate	ed from the dat	te of th	e investigation to	an adequate plumb the estimated date	of compliance.
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enteri	ng item (except :	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$180			TOTAL		\$8



	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335						
	Public Water S						Years of
Violation No.		Juppiy				Percent Interest	Depreciation
violation No.	20						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$2,000	1-Jul-2015	1-May-2016	0.84	\$6	\$111	\$117
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	wellhouse (\$	500), water treatn date of th	nent plant (\$50 le investigation	00), and to the	d ground storage t estimated date of	ance and housekeep ank (\$1,000), calcu compliance. for one-time avoid	lated from the
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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOI DED costs							
Approx. Cost of Compliance		\$2,000			TOTAL		\$117

Screening Date 22-Sep-2015 Docket No. 2015-1450-MLM-E PCW Respondent LASS WATER COMPANY INC Policy Revision 4 (April 2014) Case ID No. 51306 PCW Revision March 26, 2014 Reg. Ent. Reference No. RN104487335 Media [Statute] Public Water Supply Enf. Coordinator Michaelle Garza Violation Number 21 Rule Cite(s) 30 Tex. Admin. Code § 290.46(m)(4) Failed to maintain all distribution system lines, storage and pressure maintenance facilities, water treatment units, and all related appurtenances in a watertight **Violation Description** condition. Specifically, water was observed leaking from equipment/pipes in the pump house. Base Penalty \$1,000 >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor OR Actual Potential Percent 5.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Failure to maintain a watertight condition could allow a significant amount of contaminants to Matrix Notes enter the distribution system that would not exceed levels protective of human health. Adjustment \$950 \$50 **Violation Events** Number of Violation Events 83 Number of violation days daily weeklv monthly mark only one Violation Base Penalty \$50 quarterly with an x semiannual annual single event One quarterly event is recommended, calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A х (mark with x) The Respondent does not meet the good faith criteria for Notes this violation Violation Subtotal \$50 Economic Benefit (EB) for this violation **Statutory Limit Test** Estimated EB Amount \$21 Violation Final Penalty Total \$59 \$59 This violation Final Assessed Penalty (adjusted for limits)

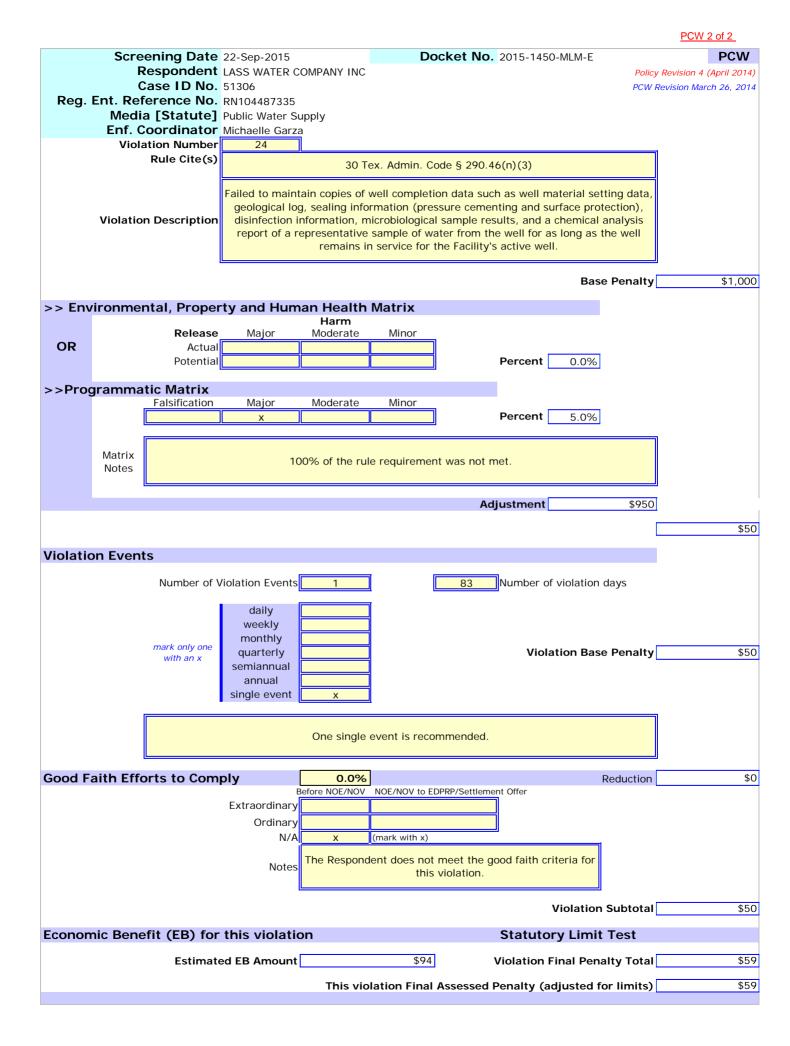
	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.							
	Public Water S						Years of
Violation No.		Jappiy				Percent Interest	Depreciation
						5.0	15
	Ltem Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		•					
Item Description	NO COMMAS OF \$						
Delayed Costs							
Equipment	[1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	1-Jul-2015	1-May-2016	0.84	\$21	n/a	\$21
Notes for DELAYED costs		inve	estigation to th	e estim	nated date of comp		
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	-		for one-time avoid	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$500			TOTAL		\$21

Respondent LASS WATER COMPANY INC. Prevented (4) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2		Scre	ening Date	22-Sen-2015	Docket No. 2015-1450-MLM-E	PCW
Case ID No. 51306 Reg. Ent. Reference. No. RNIO4487335 Media (Statuta) Public Wolor Supply Ent. Coordinator Michaelle Carza Violation Number 2 Rule Cite(s) Rel ci						
Media [Statute] Public Water Supply Finite Coordinators Rule Cite(s) 30 Tex. Admin. Code § 290.46(m)(6) Pailed to maintain all pumps, motors, valves, and other mechanical devices in good verking condition. Specifically, were heavily rusted and one of the pumps was running backwards. So Tex. Admin. Code § 290.46(m)(6) Pailed to maintain all pumps, motors, valves, and other mechanical devices in good working condition. Specifically, were heavily rusted and one of the pumps was running backwards. So R Release Actual Main Percent 5.0% >> Programmatic Matrix Harm Release Main Pailfication Major Moderate Matrix Failfication Major Programmatic Matrix Harm Release Major Failfication Major Moderate Matrix Failfication Major Violation Events Statuto of violation Events Statuto of violation fuents Number of Violation Events Statutory Limit Test Statutory Limit Test Good Faith Efforts to Comply 0.0% Noters Reduction Statutory Limit Test Violation Statutory Limit Test						PCW Revision March 26, 2014
Enf. Coordinator Michaelic Garza Violation Number 2 Rule Cite(s) So Tax. Admin. Code § 290,46(m)(6) Failed to maintain all pumps, motors, valves, and other mechanical devices in good the pumps was running backwards. So Tax. Admin. Code § 290,46(m)(6) Failed to maintain all pumps, motors, valves, and other mechanical devices in good the pumps was running backwards. So Tax. Admin. Code § 290,46(m)(6) So Tax. Admin. Code § 290,46(m)(6) Base Penalty So Tax. Admin. Code § 290,46(m)(6) So Copool to significant amounts of contaminants which would not coccol levels that are protective of human health. Matrix False facility in good working condition could cause evaluation to date of the investigation. July 1, 2015, to the date of scroconing. Soptember 22, 2015.	Reg.					
Violation Number 22 Rule Cite(6) 30 Tex. Admin. Code § 290.46(m)(6) Violation Description Failed to maintain all pumps, motors, valves, and other mechanical devices in good the pumps ware having valued and one of the pumps ware nearly routed and one of the pumps ware nearly to a second and the pumps ware nearly routed and one of the pumps ware nearly work to a second second levels that are protective of human nearly protective of human nearly routed and one of the pumps ware nearly second and an one protective of having and the protective of human nearly single event Violation Events Statutory level wards are recommended (one for each service pump), calculated from the date of the investigation, July 1. 2015, the date of screening. September 22, 2015. Good Faith Efforts to Comply 0.0% Reduction Statutory Limit Test Violation Subtotal <td< th=""><th></th><th></th><th></th><th></th><th></th><th></th></td<>						
Rule Cite(s) 30 Tex. Admin. Code § 290.46(m)(6) Violation Description Failed to maintain all pumps, motors, valves, and other mechanical devices in good the pumps was running backwards. Sease Penalty \$1,000 >> Environmental, Property and Human Health Matrix Base Penalty OR Release Marrix Ham OR Release Marrix Failed to maintain all pumps, motors, valves, and other mechanical devices in good the process of the facility to the pumps was running backwards. OR Release Aging Moderato Marrix Failed to maintain the facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants with would not exceed levels that are protective of human health. Marrix Failed to maintain the facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants with would not exceed levels that are protective of human health. Violation Events Store Number of Violation Events 2 Number of Violation Events 2 Violation Base Penalty \$100 Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, up 1, 2015, to the date of service pump), calculated from the date of the investi						
Joint A. Admin. Code 9 240 - Be(III)(8) Violation Description Violation Description Violation Description Sase Penalty Statum OR Actual Main OR Actual Main Main OR Actual Main Main Percent Solg Percent Solg Main Percent Main Percent Solg Percent Solg Percent Solg Percent Solg Percent Solg Percent Solg Main Percent Solg Violation Events Solg Violation Events Quarterly method Solg Violation Base Penalty Solg Violation Base Penalty		VIOI				
Violation Description working condition. Specifically, both service pumps were heavily rusted and one of the pumps was running backwards. Base Penalty \$1,000 >> Environmental, Property and Human Health Matrix Ham OR Release Major Potential x Percent 5.0% >> Programmatic Matrix Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants which would not exceed levels that are profective of human health. Notes Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants which would not exceed levels that are profective of human health. Notes Stot Violation Events 2 working and the second of the facility of the exposed to significant amounts of contaminants which would not exceed levels that are profective of human health. Violation Events 2 working and an unant annual a			Rule Cite(3)	30 Te	ex. Admin. Code § 290.46(m)(6)	
>> Environmental, Property and Human Health Matrix Harm Moderate Minor Actual x Percent 5.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants which would not exceed levels that are protective of human health. Violation Events Violation Events Violation Events Stop work my or working condition could cause customers of violation days Stop work my or work my or working condition could cause customers of violation days Stop work my or work my or working condition could cause customers of violation days Stop work my or work my or working condition could cause customers of violation days Stop work my or work my or working condition could cause customers of violation days Stop work my or work my or working condition could cause customers of violation Base Penalty \$100 Stop work my or work my or work my or working condition could cause customers of violation Base Penalty \$100 Stop work my or work		Violatio	n Description	working condition. Specifica	lly, both service pumps were heavily rusted and on	
OR Actual Major Moderate Minor >>Programmatic Actual x Percent 5.0% >>Programmatic Faisfication Major Moderate Minor Faisfication Major Moderate Minor Percent 0.0% Matrix Faisfication Major Moderate Minor Percent 0.0% Visit Faisfication Major Moderate Minor Percent 0.0% Visit Matrix Matrix Matrix Major Matrix Statual Statual Matrix Matrix Matrix Matrix Matrix Matrix Matrix Matrix Matrix					Base Pen	alty\$1,000
OR Release Potential Major Moderate Minor >>Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 5.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Matrix Falsification Moderate Minor Percent 0.0% 550 Violation Events 2 83 Number of violation days 550 Violation Events 2 83 Number of violation days 5100 mark only one gailet went 9 Simannual Simannual <td< th=""><th>>> Env</th><th>vironme</th><th>ntal, Proper</th><th>rty and Human Health</th><th>Matrix</th><th></th></td<>	>> Env	vironme	ntal, Proper	rty and Human Health	Matrix	
OR Actual x Percent 5.0% >>Programmatic Matrix Failsitication Major Moderate Minor Failsitication Major Moderate Minor Percent 0.0% Matrix Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts which would not exceed levels that are protective of human health. S950 Violation Events Adjustment \$950 Violation Events 83 Number of violation days daily annual single event annual annual single event single event 0.0% Reduction Cood Faith Efforts to Comply 0.0% Reduction \$0 Violation, July 1, 2015, to the date of screening, September 22, 2015. Some Some Some Some Some Some Some Some			Delesse		Minor	
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Faisification Major Moderate Minor Percent 0.0% Matrix Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants which would not exceed levels that are protective of human health. Adjustment \$950 Violation Events Number of Violation Events 83 Number of violation days daily guarterly \$100 mark only one guarterly \$100 single event \$100 the investigation, July 1, 2015, to the date of screening, September 22, 2015. \$0 Cood Faith Efforts to Comply 0.0% Extraordinary Notes Reduction \$0 Violation Subtotal \$100 Violation Subtotal \$100	on				Percent 5.0%	
Faisification Major Moderate Minor Percent 0.0% Matrix Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants which would not exceed levels that are protective of human health. Adjustment \$950 Violation Events Number of Violation Events 83 Number of violation days daily guarterly \$100 mark only one guarterly \$100 single event \$100 the investigation, July 1, 2015, to the date of screening, September 22, 2015. \$0 Cood Faith Efforts to Comply 0.0% Extraordinary Notes Reduction \$0 Violation Subtotal \$100 Violation Subtotal \$100				, <u> </u>		
Matrix Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants which would not exceed levels that are protective of human health. Adjustment \$950 Store \$50 Violation Events \$30 Number of Violation Events \$33 Matrix weekly mark only one \$33 with an x \$33 Number of Violation Events \$100 Matrix \$100 mark only one \$100 mark only one \$100 mark only one \$100 mark only one \$100 Single event \$100 Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening. September 22, 2015. Good Faith Efforts to Comply 0.0% Extraordinary \$100 Violation Subtotal \$100 Violation Subtotal \$100 Extraordinary \$100 Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100 Statutory Limit Test<	>>Pro	gramma		Maion Madagata		
Matrix Failure to maintain the Facility in good working condition could cause customers of the Facility to be exposed to significant amounts of contaminants which would not exceed levels that are protective of human health. Adjustment \$950 Store \$50 Violation Events \$33 Number of Violation Events \$33 Matrix weekly mark only one \$100 with an x \$100 Single event \$100 Cood Faith Efforts to Comply 0.0% Violation. July 1, 2015, to the date of screening. September 22, 2015. Good Faith Efforts to Comply 0.0% Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100			Falsification	Major Moderate		
Matrix Notes be exposed to significant amounts of contaminants which would not exceed levels that are protective of human health. Adjustment \$950 Store \$50 Violation Events \$3 Number of Violation Events \$3 Matrix \$3 Matrix \$3 Matrix \$100						
Adjustment \$950 Violation Events \$50 Number of Violation Events 2 83 Number of violation days daily				ed to significant amounts of co	ontaminants which would not exceed levels that are	
S50 Violation Events Number of Violation Events Authors Mumber of Violation Events Authors Mark only one weekly semiannual annual single event Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOF/NOV NE/NOV to EDPRP/Settlement Offer Extraordinary				protocti		
Violation Events Number of Violation Events daily weekly monthly quarterly x semiannual single event Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Before NOE/NOV NoE/NOV to EDPRP/Settlement Offer Extraordinary 0rdinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test					Adjustment	\$950
Violation Events Number of Violation Events daily weekly monthly quarterly x semiannual single event Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Before NOE/NOV NoE/NOV to EDPRP/Settlement Offer Extraordinary 0rdinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test						\$50
Number of Violation Events 2 83 Number of violation days daily weekly guarterly with an x daily weekly guarterly semiannual single event Violation Base Penalty \$100 Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Reduction \$00 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer \$00 Extraordinary Ordinary NA X NA X Imark with x) Notes The Respondent does not meet the good faith criteria for this violation. \$100 Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test						
daily weekly mark only one weekly with an x weekly annual annual annual annual annual annual single event With an x Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x (mark with x) Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100	Violati	on Event	ts			
daily weekly mark only one weekly with an x weekly annual annual annual annual annual annual single event With an x Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x (mark with x) Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100			Number of V	/iolation Events 2	83 Number of violation days	
mark only on with an x weekly monthly quarterly semiannual annual single event Violation Base Penalty \$100 Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Reduction \$00 Good Faith Efforts to Comply 0.0% 0.0% Reduction \$00 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer \$100 Extraordinary						
mark only one with an x monthly quarterly x x Violation Base Penalty \$100 with an x semiannual annual single event x x x x Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. x x x Good Faith Efforts to Comply 0.0% Reduction \$00 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer x x Violation Subtotal x x (mark with x) N/A x (mark with x) x x Notes The Respondent does not meet the good faith criteria for this violation. \$100 Economic Benefit (EB) for this violation Statutory Limit Test						
mark only one with an x quarterly semiannual annual annual single event \$100 Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Sector						
with all X semiannual annual single event Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary Ordinary N/A X (mark with x) Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100					Violation Base Pen	alty \$100
single event Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary 0rdinary Ordinary 0.0% Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test			with an x		Violation base i en	
Two quarterly events are recommended (one for each service pump), calculated from the date of the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer \$0 Cordinary 0 \$0 N/A x (mark with x) \$100 Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test				annual		
the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary				single event		
the investigation, July 1, 2015, to the date of screening, September 22, 2015. Good Faith Efforts to Comply 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary						
Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary						e of
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary			the	investigation, July 1, 2015, to	o the date of screening, september 22, 2015.	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	Cood	oith Fff	arta ta Cama		Dates	ti
Extraordinary Ordinary N/A x (mark with x) Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100 Economic Benefit (EB) for this violation	GOOG F					\$U
N/A x (mark with x) Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test				Extraordinary		
Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test				Ordinary		
Notes this violation. Violation Subtotal \$100 Economic Benefit (EB) for this violation Statutory Limit Test				N/A <mark>x</mark>	(mark with x)	
Economic Benefit (EB) for this violation Statutory Limit Test				Notes The Respond		
					Violation Subt	otal \$100
Estimated EB Amount \$4 Violation Final Penalty Total \$118	Econor	mic Bene	efit (EB) for	this violation	Statutory Limit Tes	t
			Fstimate	ed FB Amount	\$4 Violation Final Penalty T	otal \$118
			Loundte			
This violation Final Assassed Denalty (adjusted for limits) \$118				This vio	lation Final Assessed Penalty (adjusted for lim	nits) \$118
THIS VIVIAUVIT FINAL ASSESSED FEDALLY LAURISTED TO FINALIST AT 10						¢/10

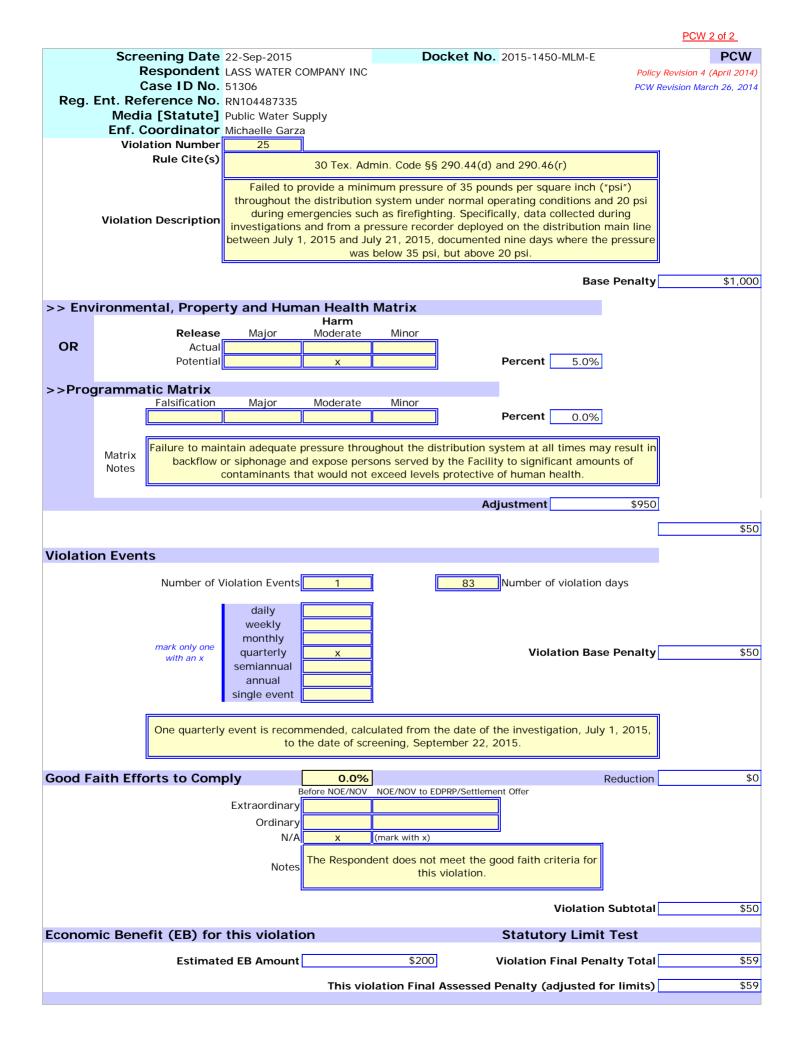
	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S	Supply				Percent Interest	Years of
Violation No.	22						Depreciation
						5.0	15
	I tem Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
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)	\$105	1-Jul-2015	1-May-2016	0.84	\$4	n/a	\$4
Notes for DELAYED costs	Ca	alculated from the	date of the inv	vestigat	tion to the estimat	e pumps (\$35/hour ed date of compliar	ice.
Avoided Costs	ANNUAL	IZE [1] avoided	costs before e	enteri	ng item (except	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$105			TOTAL		\$4

	Scre	ening Date	22-Sep-2015	Docket No. 2015-1450-MLM-E		PCW
			LASS WATER COMPANY INC			Revision 4 (April 2014)
Rea.		ase ID No. erence No.	S1306 RN104487335		PCW R	Revision March 26, 2014
j.			Public Water Supply			
			Michaelle Garza			
	VIOIA	tion Number Rule Cite(s)				
			30 1	ex. Admin. Code § 290.46(n)(1)		
	Violation	n Description		nd up-to-date detailed as-built plans or record the storage tank, pressure tank, and service p		
				Bas	se Penalty	\$1,000
>> En	vironmer	ntal, Propei	rty and Human Health	Matrix		
		Release	Harm Major Moderate	Minor		
OR		Actual			1	
		Potential		Percent 0.0%]	
>>Pro	ogramma	tic Matrix	Maine Madavata			
		Falsification	Major Moderate	Minor Percent 5.0%	1	
			······································		-	
	Matrix Notes		100% of the rul	e requirement was not met.		
				Adjustment	\$950	
					[\$50
Vieleti		-				
violati	ion Event	S				
		Number of \	/iolation Events 1	83 Number of violation	i days	
			daily			
			weekly			
		mark only one with an x	monthly quarterly	Violation Bas	e Penalty	\$50
		with an x	semiannual			
			annual single event x			
	г			1 		
			One single	event is recommended.		
Good F	Faith Effo	orts to Com	ply 0.0%		Reduction	\$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
			Extraordinary Ordinary			
			N/A x	(mark with x)	ส	
			Notes The Respond	lent does not meet the good faith criteria for this violation.		
				Violation	n Subtotal	\$50
Econor	mic Bene	fit (EB) for	this violation	Statutory Limi	t Test	
		Estimate	ed EB Amount	\$94 Violation Final Pen	alty Total	\$59
				lation Final Assessed Penalty (adjusted t		\$59
				action i mai Assessed i enalty (aujusted		- U Ψ

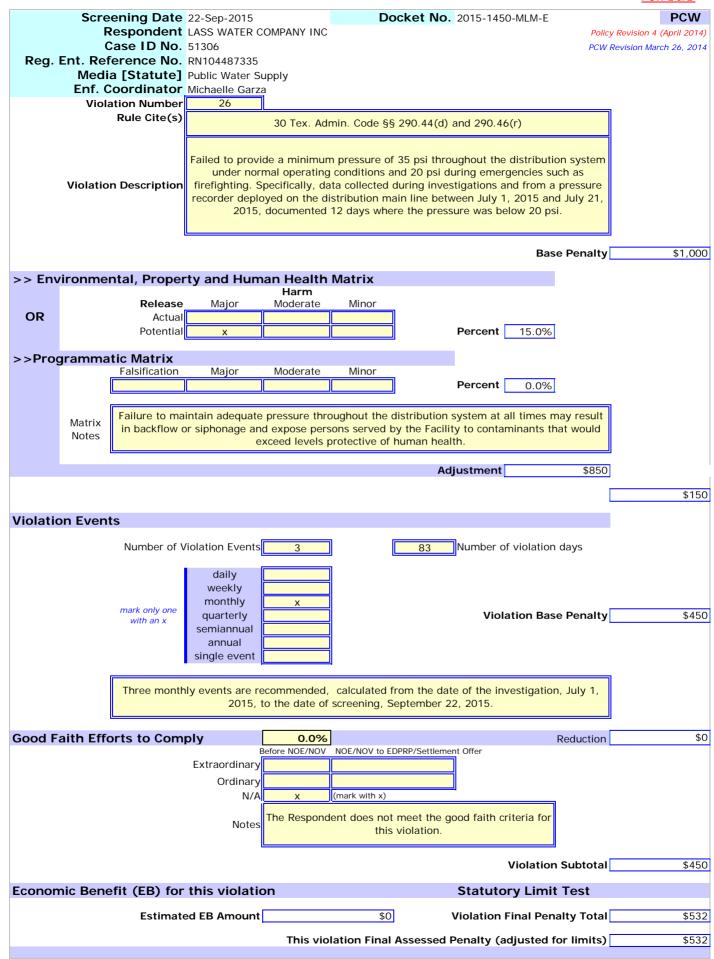
	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.	51306						
Rea. Ent. Reference No.	RN104487335						
	Public Water S						Years of
Violation No.		appiy				Percent Interest	Depreciation
						5.0	15
	I tem Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		•					
rtem Description	NO COMIMAS OF \$						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings		╬━━━━━╬		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	1-Jul-2015	1-Oct-2016	1.25	\$94	n/a	\$94
Training/Sampling	<u> </u>	1 301 2013	1 000 2010	0.00	\$0	n/a	<u>\$0</u>
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0		
						n/a	80
Other (as needed)	The delaye	ed cost includes th	ne estimated ar	0.00	\$0	n/a n/a t plans or record dr	\$0 \$0 awings and
Notes for DELAYED costs	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount t tank, a e estim	\$0 to maintain as-buil and service pumps ated date of comp	n/a It plans or record dr , calculated from th liance.	\$0 awings and e date of the
Notes for DELAYED costs	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount t tank, a e estim	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f	n/a It plans or record dr , calculated from th liance. for one-time avoi	\$0 awings and e date of the ded costs)
Notes for DELAYED costs Avoided Costs Disposal	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount t tank, a e estim enterin 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0	n/a It plans or record dr , calculated from th liance. for one-time avoi \$0	\$0 rawings and e date of the ded costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount t tank, a e estim enterin 0.00 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0 \$0	n/a It plans or record dr , calculated from th liance. for one-time avoi \$0 \$0	\$0 rawings and e date of the ded costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount t tank, a e estim enterin 0.00 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0 \$0 \$0	n/a It plans or record dr , calculated from th Iliance. for one-time avoi \$0 \$0 \$0	\$0 rawings and e date of the ded costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	specification	ns for the storage inve	tank, pressure estigation to the	0.00 mount t tank, a e estim 0.00 0.00 0.00 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0 \$0 \$0 \$0 \$0	n/a It plans or record dr , calculated from th Iliance. for one-time avoi \$0 \$0 \$0 \$0	\$0 rawings and e date of the ded costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount f tank, a e estim 0.00 0.00 0.00 0.00 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a It plans or record dr , calculated from th Iliance. for one-time avoi \$0 \$0 \$0 \$0 \$0	\$0 rawings and e date of the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount t tank, a e estim 0.00 0.00 0.00 0.00 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a It plans or record dr , calculated from th liance. for one-time avoi \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 rawings and e date of the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount f tank, a e estim 0.00 0.00 0.00 0.00 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a It plans or record dr , calculated from th Iliance. for one-time avoi \$0 \$0 \$0 \$0 \$0	\$0 rawings and e date of the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	specification	ns for the storage inve	tank, pressure estigation to the	0.00 nount t tank, a e estim 0.00 0.00 0.00 0.00 0.00	\$0 to maintain as-buil and service pumps hated date of comp ng item (except f \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a It plans or record dr , calculated from th liance. for one-time avoi \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 rawings and e date of the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic l	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.		,					
	Public Water S						Years of
Violation No.		suppry				Percent Interest	Depreciation
violation No.	24					5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
I tem Description	No commas or \$						
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	\$1,500	1-Jul-2015	1-0ct-2016	1.25	\$94	n/a	\$94
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		date of th	e investigation	n to the	estimated date of		
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enteri	ng item (except	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$94



	E	conomic	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.		5					
	Public Water S						Years of
Violation No.		Juppiy				Percent Interest	Depreciation
Violation No.	23					5.0	
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
I tem Description	No commas or \$						
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)				0.00	\$0	n/a	\$0
Notes for DELAYED costs							
Avoided Costs	ANNUAL	IZE [1] avoided	costs before e	enterii	na item (except	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	\$200	1-Jul-2015	21-Jul-2015	0.00	\$0	\$200	\$200
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs		pressure throughout	ut the distributi	on sys		sight that could hav om the first docume ed date.	
Approx. Cost of Compliance	[\$200			TOTAL		\$200
	L	ψ200			TOTAL	L	Ψ200



	E	conomic l	Benefit	Wo	rksheet		
Respondent	LASS WATER	COMPANY INC					
Case ID No.							
Reg. Ent. Reference No.	RN104487335	5					
	Public Water S						Years of
Violation No.	26	11.5				Percent Interest	Depreciation
						5.0	15
	Ltem Cost	Date Required	Final Date	Yrs	Interest Saved		EB Amount
Item Description		•					
item Description							
Delayed Costs							
Equipment		1 1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0	\$0
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							
NOTES TOT DELATED COSTS							
Avoided Costs		IZE [1] avoided	costs before	enteri	na item (except	for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
	The avoide	d cost of complian	ice for this viol	ation is	s captured in the e	conomic benefit ass	sociated with
Notes for AVOIDED costs					no. 25.		
Approx. Cost of Compliance		\$0			TOTAL		\$0

Screening Date 22-Sep-2015 Docket No. 2015-1450-MLM-E PCW Respondent LASS WATER COMPANY INC Policy Revision 4 (April 2014) Case ID No. 51306 PCW Revision March 26, 2014 Reg. Ent. Reference No. RN104487335 Media [Statute] Public Water Supply Enf. Coordinator Michaelle Garza Violation Number 27 Rule Cite(s) 30 Tex. Admin. Code § 290.46(t) Failed to post a legible sign at the Facility's production, treatment, and storage facilities that contains the name of the Facility and emergency telephone numbers **Violation Description** where a responsible official can be contacted. Specifically, the well site and water treatment plant did not have current ownership signs. Base Penalty \$1,000 >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor OR Actual Potential Percent 0.0% >>Programmatic Matrix Major Falsification Moderate Minor Percent 5.0% х Matrix 100% of the rule requirement was not met. Notes Adjustment \$950 \$50 **Violation Events** Number of Violation Events 83 Number of violation days daily weeklv monthly mark only one Violation Base Penalty \$100 quarterly with an x semiannual annual single event Two single events are recommended (one for each sign). Good Faith Efforts to Comply 0.0% Reduction \$0 Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A х (mark with x) The Respondent does not meet the good faith criteria for Notes this violation Violation Subtotal \$100 Economic Benefit (EB) for this violation **Statutory Limit Test** Estimated EB Amount \$11 Violation Final Penalty Total \$118 \$118 This violation Final Assessed Penalty (adjusted for limits)

	E	conomic	Benefit	Wo	rksheet		
Respondent		COMPANY INC					
Case ID No.	51306						
Reg. Ent. Reference No.	RN104487335)					
Media	Public Water S	vlaquõ				_	Years of
Violation No.						Percent Interest	Depreciation
violation ito.	27					5.0	15
		Data Daminad	Einel Date	Ver			-
		Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$200	1-Jul-2015	1-Apr-2016	0.75	\$1	\$10	\$11
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	water treatmo	ent plant, calculate	ed from the da	te of th	e investigation to	ship sign at the wel the estimated date	of compliance.
Avoided Costs		IZE [1] avoided	costs before			for one-time avoid	
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$0	\$0 \$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				<u>,</u>		¥¥	
Approx. Cost of Compliance		\$200			TOTAL		\$11

					PCW 2 of 2
	Scre	ening Date	22-Sep-2015	Docket No. 2015-1450-MLM-E	PCW
	F	Respondent	LASS WATER COMPANY INC		Policy Revision 4 (April 2014)
		ase ID No.			PCW Revision March 26, 2014
Reg.		erence No.			
			Public Water Supply		
		ation Number	Michaelle Garza		
	VIOI	Rule Cite(s)			
			30	Tex. Admin. Code § 290.46(u)	
	Violatio	n Description	cement according to 16 Tex.	ed public water supply well owned by the system w Admin. Code ch. 76. Specifically, well no. G09101 o the subdivision, was abandoned and had not bee plugged.	<mark>43B,</mark>
				Base Per	nalty \$1,000
	_				
>> En\	vironme	ntal, Proper	ty and Human Health _{Harm}	Matrix	
		Release	Major Moderate	Minor	
OR		Actual			
		Potential	Х	Percent 15.0%	
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor	
				Percent 0.0%	
	Matrix Notes	Failure to plu		xpose customers of the Facility to contaminants what are protective of human health.	nich
				Adjustment	\$850
					\$150
Violatio	on Event	ts			
		Number of V	iolation Events 3	83 Number of violation days	
		mark only one with an x	dailyImage: Constraint of the sectorweeklyImage: Constraint of the sectormonthlyxquarterlyImage: Constraint of the sectorsemiannualImage: Constraint of the sectorannualImage: Constraint of the sectorsingle eventImage: Constraint of the sector	Violation Base Per	nalty\$450
		Three mont		calculated from the date of the investigation, July screening, September 22, 2015.	1,
Good F	aith Effo	orts to Com	oly 0.0%	Redu	ction \$0
			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary	(mark with y)	
				(mark with x) ent does not meet the good faith criteria for this violation.	
			·		total \$450
				Violation Sub	
Econor	nic Bene	efit (EB) for	this violation	Statutory Limit Tes	st
		Estimate	ed EB Amount	\$69 Violation Final Penalty	Total \$532
			This vio	lation Final Assessed Penalty (adjusted for lir	mits) \$532

Economic Benefit Worksheet									
Respondent	LASS WATER	COMPANY INC							
Case ID No.									
Reg. Ent. Reference No.		5							
	Public Water S						Years of		
Violation No.		Sabbil				Percent Interest	Depreciation		
violation No.	20					5.0	15		
		Data Daminad	Einel Data	Vee					
		Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount		
I tem Description	No commas or \$								
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 \$0	n/a	\$0 \$0		
Remediation/Disposal Permit Costs				0.00	\$0 \$0	n/a n/a	\$0 \$0		
Other (as needed)	\$1,500	1-Jul-2015	1-Jun-2016	0.00	\$69	n/a	\$69		
Notes for DELAYED costs		the in	vestigation to	the est	imated date of cor				
Avoided Costs	ANNUAL	IZE [1] avoided	costs before			for one-time avoi	ded 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 [2]				0.00	\$0	\$0	\$0		
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$1,500			TOTAL		\$69		

	Sara	ening Date	22 607 2015	Docket No. 2015-1450-MLM-E	PCW
			LASS WATER COMPANY INC		y Revision 4 (April 2014)
		Case ID No.			Revision March 26, 2014
Reg.		erence No.			
			Public Water Supply		
		coordinator	Michaelle Garza		
	VIOIA	Rule Cite(s)			٦
			30	Tex. Admin. Code § 290.46(v)	
	Violatio	n Description	local or national electrical and in the pump house ha	ectrical wiring is securely installed in compliance with a code. Specifically, the electrical boxes in the wellhouse ad no protective panels, leaving the wiring exposed to	
			moisture	and other environmental conditions.	
				Base Penalty	\$1,000
>> Env	vironme	ntal, Proper	ty and Human Health	Matrix	
		Release	Harm Major Moderate	Minor	
OR		Actual			
		Potential	X	Percent 15.0%	
>>Pro	gramma	tic Matrix Falsification	Major Moderate	Minor	
				Percent 0.0%	
			· · · · · · · · · · · · · · · · · · ·		-
		Failure to ens	ure all electrical wiring is in	stalled in compliance with a local or national code could	
	Matrix Notes	cause eq	uipment malfunctions result	ing in low pressure or outages which could expose	
	Notes	customers of	the Facility to contaminants	which would exceed levels protective of human health.	
					<u>_</u>]
				Adjustment \$850	
					\$150
					\$130
Violati	on Event	ts			
		Number of V	/iolation Events 6	83 Number of violation days	
			daily		
			weekly	-	
		mark only one	monthly <u>x</u> quarterly	Violation Base Penalty	\$900
		with an x	semiannual		¢,000
			annual]	
			single event		
					٦
		2	•	hree for each location), calculated from the date of the the date of screening, September 22, 2015.	
			G 1 J 1		
Good F	aith Effo	orts to Com	ply 0.0%	Reduction	\$C
			Before NOE/NOV	Houdottor	
			Extraordinary		
			Ordinary		
			N/A x	(mark with x)	
			Notes The Respond	dent does not meet the good faith criteria for this violation.	
				Violation Subtota	\$900
Econor	mic Bene	efit (EB) for	this violation	Statutory Limit Test	
1		Fstimate	ed FB Amount	\$21 Violation Final Penalty Tota	\$1 065
		Estimate	ed EB Amount	\$21 Violation Final Penalty Tota lation Final Assessed Penalty (adjusted for limits)	

	E	conomic	Benefit	Wo	rksheet				
Respondent LASS WATER COMPANY INC									
Case ID No.	51306								
Reg. Ent. Reference No.									
	Public Water S						Years of		
Violation No.		зарріу				Percent Interest	Depreciation		
						5.0	15		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount		
Item Description		•							
item bescription									
Deleved Cente									
Delayed Costs	I	1			0.1	¢0	0.0		
Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
Buildings Other (as needed)	\$400	1-Jul-2015	1-Apr-2016	0.00	\$U \$1	\$0	\$U \$21		
Engineering/Construction	\$400	1-Jui-2015	1-A01-2010	0.75	\$0	\$20	\$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	or nationa	l code, calculated	from the date	of the i	nvestigation to the	I wiring in complian e estimated date of	compliance.		
Avoided Costs			costs before	-		for one-time avoid			
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0		
Personnei Inspection/Reporting/Sampling				0.00	\$0 \$0	<u>\$0</u> \$0	\$0 \$0		
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
Financial Assurance [2]				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0 \$0		
Other (as needed)				0.00	\$0	\$0	\$0 \$0		
Notes for AVOIDED costs		J		<u>1 0.00</u>	<u> </u>	<u>40</u>			
Approx. Cost of Compliance		\$400			TOTAL		\$21		

	Screening				Doc	cket No. 2015-145	0-MLM-E	PCW
	Respor Case I		ASS WATER COMP	ANY INC				y Revision 4 (April 2014)
Rea.	Ent. Referenc						PCW	Revision March 26, 2014
			Public Water Supply	у				
			Michaelle Garza					
	Violation N Pule (umber Cite(s)	30					1
	Kule (Sile(3)		30 1	Tex. Admin. C	ode § 290.46(I)		
	Violation Desci	ription	Failed	d to flush a	all dead-end i	mains at monthly inte	ervals.	
							Base Penalty	\$1,000
>> Env	vironmental, F	Propert			Matrix			
	R	elease		Harm oderate	Minor			
OR		Actual	_			-		
	Po	otential		х		Percent	5.0%	
>>Pro	grammatic Ma	trix						
		cation	Major Mo	oderate	Minor			
						Percent	0.0%	
						ould expose customer		
	Notes signif	icant am	ounts of contamina	ants which	i would not ex	ceed levels protectiv	e of numan nealth.	
								<u>1</u>
						Adjustment	\$950	
								\$50
Violati	on Events							
Violati								
	Num	ber of Vio	olation Events	1		83 Number o	f violation days	
	Num	ber of Vio	olation Events	1		83 Number o	f violation days	
	Num	ber of Vid	daily weekly	1		83 Number o	f violation days	
	mark o	nly one	daily weekly monthly	1				\$50
	mark o		daily weekly	1			f violation days ntion Base Penalty	\$50
	mark o	nly one	daily weekly monthly quarterly semiannual annual	1				\$50
	mark o	nly one	daily weekly monthly quarterly semiannual	1				\$50
	mark o with	nly one an x	daily weekly monthly quarterly semiannual annual single event		Lated from th	Viola	ition Base Penalty	\$50
	mark o with	nly one an x	daily weekly monthly quarterly semiannual annual single event event is recommen	nded, calcu			ition Base Penalty	\$50
	mark o with	nly one an x	daily weekly monthly quarterly semiannual annual single event event is recommen	nded, calcu		Viola e date of the investig	ition Base Penalty	\$50
Good F	mark o with	nly one an x uarterly e	daily weekly monthly quarterly semiannual single event to the da	nded, calcu ate of scre	eening, Septe	Viola e date of the investig mber 22, 2015.	ition Base Penalty	
Good F	mark o with One qu	uarterly one	daily weekly monthly quarterly semiannual annual single event is recommento to the da	nded, calcu ate of scre	eening, Septe	Viola e date of the investig	ation Base Penalty	\$50
Good F	mark o with One qu	uarterly one	daily weekly monthly quarterly semiannual single event to the da	nded, calcu ate of scre	eening, Septe	Viola e date of the investig mber 22, 2015.	ation Base Penalty	
Good F	mark o with One qu	uarterly one	daily weekly monthly quarterly semiannual single event srecommen to the data t	ded, calcu ate of scre 0.0% ≥ NOE/NOV	eening, Septe	Viola e date of the investig mber 22, 2015.	ation Base Penalty	
Good F	mark o with One qu	uarterly one	daily weekly monthly quarterly semiannual annual single event is recommento the data to th	ided, calcu ate of scre 0.0% • NOE/NOV	NOE/NOV to EDP (mark with x)	Viola e date of the investig mber 22, 2015.	ation Base Penalty ation, July 1, 2015, Reduction	
Good F	mark o with One qu	uarterly one	daily weekly monthly quarterly semiannual annual single event is recommento the data single form to th	ided, calcu ate of scre 0.0% • NOE/NOV	NOE/NOV to EDP (mark with x)	viola e date of the investig mber 22, 2015.	ation Base Penalty ation, July 1, 2015, Reduction	
	mark o with One qu Faith Efforts to	nly one an x	daily weekly monthly quarterly semiannual annual single event is recommento the data to th	ided, calcu ate of scre 0.0% • NOE/NOV	NOE/NOV to EDP (mark with x)	viola e date of the investig mber 22, 2015.	ation Base Penalty ation, July 1, 2015, Reduction	\$0
	mark o with One qu Faith Efforts to mic Benefit (El	nly one an x uarterly c o Comp B) for 1	daily weekly monthly quarterly semiannual annual single event to the da event is recommen to the da iy Extraordinary Ordinary N/A Notes The Notes	ided, calcu ate of scre 0.0% • NOE/NOV	NOE/NOV to EDP (mark with x) ent does not r this v	Viola e date of the investig mber 22, 2015. PRP/Settlement Offer neet the good faith curriolation.	ation Base Penalty pation, July 1, 2015, Reduction riteria for Violation Subtotal ry Limit Test	\$0
	mark o with One qu Faith Efforts to mic Benefit (El	nly one an x uarterly c o Comp B) for 1	daily weekly monthly quarterly semiannual annual single event is recommento the data to th	ided, calcu ate of scre 0.0% • NOE/NOV	NOE/NOV to EDP (mark with x)	Viola e date of the investig mber 22, 2015. PRP/Settlement Offer neet the good faith curriolation.	ation Base Penalty ation, July 1, 2015, Reduction	\$0

Economic Benefit Worksheet									
Respondent	LASS WATER	COMPANY INC							
Case ID No.									
Reg. Ent. Reference No.	RN104487335	5							
	Public Water S						Years of		
Violation No.		Juppiy				Percent Interest	Depreciation		
violation No.	50					5.0	15		
	14 0t	Data Daminad	Einel Data						
		Date Required	Final Date	Yrs	Interest Saved	Unetime Costs	EB Amount		
I tem Description	No commas or \$								
Delayed Costs	1				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 \$0	n/a	\$0 \$0		
Training/Sampling				0.00	\$0 \$0	n/a n/a	\$0 \$0		
Remediation/Disposal Permit Costs				0.00	\$0	n/a	\$0 \$0		
Other (as needed)	\$750	1-Jul-2015	1-Apr-2016	0.00	\$28	n/a	\$28		
Notes for DELAYED costs		the date of	the investigation	on to tl	ne estimated date	·			
Avoided Costs	ANNUAL	IZE [1] avoided	costs before			for one-time avoi			
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 [2]				0.00	\$0	\$0	\$0		
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$750			TOTAL		\$28		

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

TCFQ

Compliance History Report

PENDING Compliance History Report for CN604203133, RN104487335, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

ICER (CH) components fi	rom September 1, 2010, through August 31, 2	015.	
Customer, Respondent, or Owner/Operator:	CN604203133, LASS WATER COMPANY INC	Classification: SATISFACTORY	Rating: 0.57
Regulated Entity: Complexity Points:	RN104487335, PRESTON CLUB UTILITY N/A	Classification: NOT APPLICABLE Repeat Violator:	Rating: N/A N/A
CH Group:	14 - Other		
Location:	APPROXIMATELY .25MI W SW OF 238 PREST	ON CLUB DR GRAYSON, TX, GRAYSON C	OUNTY
TCEQ Region:	REGION 04 - DFW METROPLEX		
ID Number(s): PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0910143			
Compliance History Period: September 01, 2010 to August 31, 2015 Rating Year: 2015 Rating Date: 09/01/2015			
-	y Report Prepared: November 03, 2015		
Agency Decision Requiring Compliance History: Enforcement			
Component Period Selected: November 03, 2010 to November 03, 2015			
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.			
Name: Michaelle Garza	3	Phone: (210) 403-4076	
Site and Owner/Oper	ator History:		
	nce and/or operation for the full five year comp		
2) Has there been a (known)3) If YES for #2, who is the c	change in ownership/operator of the site durin urrent owner/operator? N/A	g the compliance period? NO	
,	ere the prior owner(s)/operator(s)? N/A		
	ge(s) in owner or operator occur? N/A		
<u>Components (Multimedia) for the Site Are Listed in Sections A - J</u>			
A. Final Orders, court judgments, and consent decrees:			
B. Criminal convictions:			
N/A C. Chronic excessive emissions events:			
N/A D. The approval dates of investigations (CCEDS Inv. Track. No.):			
Item 1 August 19	9, 2014 (1178747)		
	er 23, 2014 (1193626) er 26, 2014 (1193255)		
Item 4 October 2			
	12, 2014 (1211640)	,	
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.			
1 Date: 11/13/2014 Self Report? NO	(1198330) CN60 Classification: Mode	4203133	
	Chapter 290, SubChapter D 290.46(n)(3)		
Description: Failure to obtain and keep on file, a copy of the well completion data.			
Self Report? NO	B, MOD(2)(B) Classification: Mode	erate	
Citation: 30 TAC	Chapter 290, SubChapter D 290.41(c)(1)(F)		
Description: Failure to provide a sanitary control easement or executive director approval for an acceptable substitute. EIC: C5, MOD(2)(B)			
Self Report? NO	Classification: Mode	erate	
	Chapter 290, SubChapter D 290.42(I)		a day and reference
Description: Failure to compile and maintain a thorough, up-to-date plant operations manual for operator review and reference. EIC: B3, MOD(2)(B)			
Self Report? NO	Classification: Mino	r	
	Chapter 290, SubChapter D 290.46(f)(2)	during an inspection	
Description: Failure to have operating records available for review during an inspection. EIC: C3, MIN(3)(C)			
Self Report? NO	Classification: Mino	r	
	Chapter 290, SubChapter D 290.43(d)(1) to have an ASME name plate on the pressure t	ank.	
•	, MIN(3)(D)		

Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.43(d)(4) Description: Failure to coat the interior of the pressure tank. EIC: C4, MIN(3)(D) Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.43(d)(3) Description: Failure to have a device for readily measuring the air-water-volume. EIC: C4, MIN(3)(D)Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.43(c)(9) 30 TAC Chapter 290, SubChapter D 290.43(d)(5) Description: Failure to provide a letter from the previous owner verifying previous use of a 9500 gal. hydro-pneumatic pressure tank. EIC: B3, MOD(2)(B) Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.46(t) Description: Failure to display proper ownership signage at the water plant and each of the well houses. EIC: C4, MIN(3)(D) Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.46(m) Description: Failure to maintain the functional and operational integrity of the ground storage tank. EIC: B18, MOD(2)(G) Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.42(e)(4)(A) Description: Failure to provide an SCBA, readily accessible outside the chlorine room. EIC: C4, MIN(3)(D) Self Report? NO Classification: Minor 30 TAC Chapter 290, SubChapter D 290.42(e)(4)(C) Citation: Description: Failure to provide adequate ventilation, which includes high level and floor level screened vents. EIC: C4, MIN(3)(D) Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.43(e) Failure to provide adequate security for the facilities. Description: EIC: B15, MIN(3)(D) Self Report? NO Classification: Minor 30 TAC Chapter 290, SubChapter D 290.46(m) Citation: Description: Failure to maintain the grounds in a manner so as to minimize the possibility of the harboring of rodents, insects, and other disease vectors. EIC: B18, MIN(3)(D) Self Report? NO Classification: Minor 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(P) Citation: Description: Failure to provide an all-weather access road to the well site. EIC: B18, MIN(3)(D) Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(O) Description: Failure to provide adequate security for the well house. EIC: B15, MIN(3)(D) Self Report? NO Classification: Minor 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K) Citation: Description: Failure to provide a well casing vent, which faces downward. EIC: C4, MIN(3)(D) Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.46(u) Description: Failure to plug the abandoned well located at the subdivision entrance. EIC: B18, MOD(2)(G) Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(ii)(III) Description: Failure to record the volume of water treated and maintain on file for review by an inspector. EIC: B3, MOD(2)(B) Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter F 290.121(a) Description: Failure to provide a monitoring plan. EIC: B3, MOD(2)(B) Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.42(a)(3) Description: Failure to provide an all-weather access road to the water treatment plant. EIC: B18, MIN(3)(D) Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.46(i) Description: Failure to provide a customer service agreement. EIC: B3, MOD(2)(B) Self Report? NO Classification: Moderate 30 TAC Chapter 290, SubChapter D 290.46(j) Citation: Description: Failure to provide and maintain copies of customer service inspections. EIC: B3, MOD(2)(B)

Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A) Description: Failure to provide customer complaint records. EIC: B3, MOD(2)(B) Self Report? NO Classification: Moderate 30 TAC Chapter 288, SubChapter B 288.20(a)(2) Citation: Description: Failure to provide a drought contingency plan. EIC: B3, MOD(2)(B) Self Report? NO Classification: Minor 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(D)(ii) Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1) Description: Failure to provide tank inspection forms from 2010, 2011, and 2012. EIC: C3, MIN(3)(A) Self Report? NO Classification: Moderate 30 TAC Chapter 290, SubChapter D 290.46(n)(1) Citation: Description: Failure to provide as-built plans and specifications for the 9500 gallon pressure tank. EIC: B3, MOD(2)(B) 12/16/2014 (1211632) CN604203133 Date: Classification: Self Report? NO Minor 30 TAC Chapter 290, SubChapter D 290.46(r) Citation: Description: Failure to maintain a minimum pressure of 35 pounds per square inch (psi) throughout the distribution system under normal operating conditions.

EIC: C4, MIN(3)(D)

F. Environmental audits:

N/A

2

- 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 ENFORCEMENT ACTION CONCERNING LASS WATER COMPANY INC; RN104487335

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

DEFAULT ORDER

DOCKET NO. 2015-1450-MLM-E

On _______, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered the Executive Director's Preliminary Report and Petition, filed pursuant to TEX. WATER CODE ch. 11, TEX. HEALTH & SAFETY CODE ch. 341, and the rules of the TCEQ, which requests appropriate relief, including the imposition of an administrative penalty and corrective action of the respondent. The respondent made the subject of this Order is LASS WATER COMPANY INC ("Respondent").

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

FINDINGS OF FACT

- Respondent owns and operates a public water system located approximately .25 miles west southwest of 238 Preston Club Drive, Grayson County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 82 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(69). The Facility adjoins, is contiguous with, surrounds, or is near or adjacent to state water as defined in TEX. WATER CODE § 11.021 and 30 TEX. ADMIN. CODE § 297.1(50).
- 2. During an investigation conducted from July 1, 2015 through July 29, 2015, TCEQ staff documented that Respondent:
 - a. Failed to adopt a drought contingency plan which includes all elements for municipal use by a retail public water supplier;
 - Failed to operate the Facility under the direct supervision of a licensed water works operator who holds a Class "D" or higher license. Specifically, the Facility was being operated by an individual with an expired license;
 - c. Failed to issue a boil water notification to the customers of the Facility within 24 hours of a low pressure event or water outage using the prescribed format in 30 TEX. ADMIN. CODE § 290.47(e). Specifically, low pressure was documented in the distribution system on July 1, 2015, and, on July 9, 2015, the pressure tank was taken offline for repairs, resulting in low pressure. In both instances, special precautions were not taken, and no boil water notices were issued within 24 hours;
 - Failed to provide a well capacity of 0.6 gallons per minute("gpm") per connection. Specifically, with 82 connections, the Facility is required to provide 49.2 gpm in well capacity; however, only 16 gpm is provided which is a 67% deficiency;
 - e. Failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling

frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements;

- f. Failed to provide a copy of a boil water notification to the Executive Director within ten days of its distribution. Specifically, a copy of a boil water notification that was observed posted on July 21, 2015, was not provided to the Executive Director;
- g. Failed to obtain a sanitary control easement that covers the land within 150 feet of the Facility's active well;
- h. Failed to ensure the wellhouse is locked during periods of darkness and when the Facility is unattended. Specifically, the wellhouse lock was not functioning;
- i. Failed to provide an all-weather access road to the Facility's active well site. Specifically, there was no road leading to the well site, which is situated northeast of the water plant in a stand of grass and trees that sits in the middle of a golf course;
- j. Failed to ensure that the Facility's water treatment plant is located at a site that is accessible by an all-weather access road. Specifically, the water treatment plant is currently accessed by driving through an undeveloped grassy lot and across a golf course fairway;
- k. Failed to provide a full-face self-contained breathing apparatus ("SCBA") or supplied air respirator that meets Occupational Safety and Health Administration ("OSHA") standards for construction and operation, and a small bottle of fresh ammonia solution (or approved equal) for testing for chlorine leakage readily accessible outside the chlorinator room and immediately available to the operator in the event of an emergency;
- I. Failed to maintain housing for gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or partitions separating all mechanical and electrical equipment from the chlorine. Specifically, the top of the chlorine room was open to the inner atmosphere of the pump house where the chlorination equipment is located;
- m. Failed to provide adequate ventilation which includes high level and floor level screened vents for all enclosures in which chlorine gas is being stored or fed. Specifically, there were no vents in the chlorine room;
- n. Failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference;
- Failed to provide a pressure tank of 1,000 gallons or larger that meets American Society of Mechanical Engineers ("ASME") Section VIII, Division 1 Codes and Construction Regulations, and which is provided with the required ASME name plate. Specifically, no ASME name plate was attached to the pressure tank;
- Failed to provide a device to readily determine air-water-volume for the pressure tank. Specifically, the pressure tank sight glass was ruptured and disconnected;
- q. Failed to ensure the water treatment plant and all appurtenances thereof are enclosed by an intruder-resistant fence and failed to ensure that the pressure tank is installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates.

Specifically, there was an 18-inch high, three-feet wide gap in the northwest corner of the fence surrounding the water treatment plant and the pressure tank did not have an intruder-resistant fence or lockable building;

- r. Failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request. Specifically, the following records were not provided for review: the amount of each chemical used each week; the amount of water treated each week; the date, location, and nature of water quality, pressure, or outage complaints received by the system and the results of any subsequent complaint investigation; the maintenance records for water system equipment and facilities; the disinfectant residual monitoring results from the distribution system; the calibration records for flow meters; the results of microbiological analyses; the results of inspections for all water storage and pressure maintenance facilities; Consumer Confidence Report compliance documentation; the results of chemical analyses; copies of the Customer Service Inspection reports; and lead and copper tap water monitoring results;
- s. Failed to maintain a supply of calcium hypochlorite on hand for use when making repairs;
- t. Failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted;
- u. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. Specifically, the wellhouse had several holes in the east wall and showed signs of inhabitation by rodents and/or insects, including: rodent feces, rat poison, wasp nests, and remnants of a large beehive; the water treatment plant housing had holes in the interior and exterior walls, the base of the walls was warped, and debris was on the floor; and the ground storage tank had significant erosion under the northwest corner of the concrete foundation causing the tank to lean heavily which restricts roof access;
- v. Failed to maintain all distribution system lines, storage and pressure maintenance facilities, water treatment units, and all related appurtenances in a watertight condition. Specifically, water was observed leaking from equipment/pipes in the pump house;
- w. Failed to maintain all pumps, motors, valves, and other mechanical devices in good working conditions. Specifically, both service pumps were heavily rusted and one of the pumps was running backwards;
- Failed to provide accurate and up-to-date detailed as-built plans or record drawings and specifications for the storage tank, pressure tank, and service pumps;
- y. Failed to maintain copies of well completion data such as well material setting data, geological log, sealing information (pressure cementing and surface protection), disinfection information, microbiological sample results, and a chemical analysis report of a representative sample of water from the well for as long as the well remains in service;
- Failed to provide a minimum pressure of 35 pounds per square inch ("psi") throughout the distribution system under normal operating conditions and 20 psi during emergencies such as firefighting. Specifically, data collected

during investigations and from a pressure recorder deployed on the distribution main line between July 1, 2015 and July 21, 2015, documented nine days where the pressure was below 35 psi, but above 20 psi;

- Failed to provide a minimum pressure of 35 psi throughout the distribution system under normal operating conditions and 20 psi during emergencies such as firefighting. Specifically, data collected during investigations and from a pressure recorder deployed on the distribution main line between July 1, 2015 and July 21, 2015, documented 12 days where the pressure was below 20 psi;
- bb. Failed to post a legible sign at the Facility's production, treatment, and storage facilities that contains the name of the Facility and emergency telephone numbers where a responsible official can be contacted. Specifically, the well site and water treatment plant did not have current ownership signs;
- cc. Failed to plug an abandoned public water supply well with cement according to 16 TEX. ADMIN. CODE ch. 76. Specifically, well no. G0910143B, located at the entrance to the subdivision, was abandoned and had not been plugged;
- dd. Failed to ensure that the electrical wiring is securely installed in compliance with a local or national electrical code. Specifically, the electrical boxes in the wellhouse and in the pump house had no protective panels, leaving the wiring exposed to moisture and other environmental conditions; and
- ee. Failed to flush all dead-end mains at monthly intervals.
- 3. The Executive Director filed the "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of LASS WATER COMPANY INC" (the "EDPRP") in the TCEQ Chief Clerk's office on March 31, 2016.
- 4. By letter dated March 31, 2016, sent to Respondent's last known address via certified mail, return receipt requested, postage prepaid, the Executive Director served Respondent with notice of the EDPRP. According to USPS.com "Track & Confirm" delivery confirmation records, Respondent received notice of the EDPRP on April 2, 2016.
- 5. More than 20 days have elapsed since Respondent received notice of the EDPRP. Respondent failed to file an answer and failed to request a hearing.

CONCLUSIONS OF LAW

- 1. As evidenced by Finding of Fact No. 1, Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE ch. 11, TEX. HEALTH & SAFETY CODE ch. 341, and the rules of the TCEQ.
- As evidenced by Finding of Fact No. 2.a., Respondent failed to adopt a drought contingency plan which includes all elements for municipal use by a retail public water supplier, in violation of TEX. WATER CODE § 11.1272(c) and 30 TEX. ADMIN. CODE §§ 288.20(a) and 288.30(5)(B).
- As evidenced by Finding of Fact No. 2.b., Respondent failed to operate the Facility under the direct supervision of a licensed water works operator who holds a Class "D" or higher license, in violation of TEX. HEALTH & SAFETY CODE § 341.033(a) and 30 TEX. ADMIN. CODE § 290.46(e)(4)(A).

- 4. As evidenced by Finding of Fact No. 2.c., Respondent failed to issue a boil water notification to the customers of the Facility within 24 hours of a low pressure event or water outage using the prescribed format in 30 TEX. ADMIN. CODE § 290.47(e), in violation of 30 TEX. ADMIN. CODE § 290.46(q)(1) and (2).
- 5. As evidenced by Finding of Fact No. 2.d., Respondent failed to provide a well capacity of 0.6 gpm per connection, in violation of TEX. HEALTH & SAFETY CODE § 341.0315(c) and 30 TEX. ADMIN. CODE § 290.45(b)(1)(C)(i).
- 6. As evidenced by Finding of Fact No. 2.e., Respondent failed to develop and maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with the monitoring requirements, in violation of 30 TEX. ADMIN. CODE § 290.121(a) and (b).
- 7. As evidenced by Finding of Fact No. 2.f., Respondent failed to provide a copy of a boil water notification to the Executive Director within ten days of its distribution, in violation of 30 TEX. ADMIN. CODE §§ 290.46(q)(1) and 290.122(f).
- 8. As evidenced by Finding of Fact No. 2.g., Respondent failed to obtain a sanitary control easement that covers the land within 150 feet of the Facility's active well, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(1)(F).
- 9. As evidenced by Finding of Fact No. 2.h., Respondent failed to ensure the wellhouse is locked during periods of darkness and when the Facility is unattended, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(3)(O).
- 10. As evidenced by Finding of Fact No. 2.i., Respondent failed to provide an all-weather access road to the Facility's active well site, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(3)(P).
- 11. As evidenced by Finding of Fact No. 2.j., Respondent failed to ensure that the Facility's water treatment plant is located at a site that is accessible by an all-weather access road, in violation of 30 TEX. ADMIN. CODE § 290.42(a)(3).
- 12. As evidenced by Finding of Fact No. 2.k., Respondent failed to provide a full-face SCBA or supplied air respirator that meets OSHA standards for construction and operation, and a small bottle of fresh ammonia solution (or approved equal) for testing for chlorine leakage readily accessible outside the chlorinator room and immediately available to the operator in the event of an emergency, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(4)(A).
- 13. As evidenced by Finding of Fact No. 2.1., Respondent failed to maintain housing for gas chlorination equipment and cylinders of chlorine in separate buildings or separate rooms with impervious walls or partitions separating all mechanical and electrical equipment from the chlorine, in violation of 30 TEX. ADMIN. CODE § 290.42(e)(4)(B).
- 14. As evidenced by Finding of Fact No. 2.m., Respondent failed to provide adequate ventilation which includes high level and floor level screened vents for all enclosures in which chlorine gas is being stored or fed, in violation of 30 TEX. ADMIN. CODE \S 290.42(e)(4)(C).
- 15. As evidenced by Finding of Fact No. 2.n., Respondent failed to compile and maintain a thorough and up-to-date plant operations manual for operator review and reference, in violation of 30 TEX. ADMIN. CODE § 290.42(I).
- 16. As evidenced by Finding of Fact No. 2.o., Respondent failed to provide a pressure tank of 1,000 gallons or larger that meets ASME Section VIII, Division 1 Codes and

Construction Regulations, and which is provided with the required ASME name plate, in violation of 30 Tex. ADMIN. CODE § 290.43(d)(1).

- 17. As evidenced by Finding of Fact No. 2.p., Respondent failed to provide a device to readily determine air-water-volume for the pressure tank, in violation of 30 TEX. ADMIN. CODE § 290.43(d)(3).
- 18. As evidenced by Finding of Fact No. 2.q., Respondent failed to ensure the water treatment plant and all appurtenances thereof are enclosed by an intruder-resistant fence and failed to ensure that the pressure tank is installed in a lockable building that is designed to prevent intruder access or enclosed by an intruder-resistant fence with lockable gates, in violation of 30 TEX. ADMIN. CODE §§ 290.42(m) and 290.43(e).
- 19. As evidenced by Finding of Fact No. 2.r., Respondent failed to maintain water works operation and maintenance records and make them readily available for review by the Executive Director upon request, in violation of 30 TEX. ADMIN. CODE § 290.46(f)(2), (f)(3)(A)(i)(III), (f)(3)(A)(ii)(III), (f)(3)(A)(iii), (f)(3)(A)(vi), (f)(3)(B)(iii), (f)(3)(B)(iv), (f)(3)(D)(i), (f)(3)(D)(ii), (f)(3)(D)(vii), (f)(3)(E)(ii), (f)(3)(E)(iv), and (f)(3)(F).
- 20. As evidenced by Finding of Fact No. 2.s., Respondent failed to maintain a supply of calcium hypochlorite on hand for use when making repairs, in violation of 30 TEX. ADMIN. CODE § 290.46(h).
- 21. As evidenced by Finding of Fact No. 2.t., Respondent failed to adopt an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in violation of 30 TEX. ADMIN. CODE § 290.46(i).
- 22. As evidenced by Finding of Fact No. 2.u., Respondent failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, in violation of 30 TEX. ADMIN. CODE § 290.46(m).
- 23. As evidenced by Finding of Fact No. 2.v., Respondent failed to maintain all distribution system lines, storage and pressure maintenance facilities, water treatment units, and all related appurtenances in a watertight condition, in violation of 30 Tex. ADMIN. CODE § 290.46(m)(4).
- 24. As evidenced by Finding of Fact No. 2.w., Respondent failed to maintain all pumps, motors, valves, and other mechanical devices in good working condition, in violation of 30 TEX. ADMIN. CODE § 290.46(m)(6).
- 25. As evidenced by Finding of Fact No. 2.x., Respondent failed to provide accurate and up-to-date detailed as-built plans or record drawings and specifications for the storage tank, pressure tank, and service pumps, in violation of 30 TEX. ADMIN. CODE § 290.46(n)(1).
- 26. As evidenced by Finding of Fact No. 2.y., Respondent failed to maintain copies of well completion data such as well material setting data, geological log, sealing information (pressure cementing and surface protection), disinfection information, microbiological sample results, and a chemical analysis report of a representative sample of water from the well for as long as the well remains in service, in violation of 30 TEX. ADMIN. CODE § 290.46(n)(3).
- 27. As evidenced by Finding of Fact No. 2.z., Respondent failed to provide a minimum pressure of 35 psi throughout the distribution system under normal operating

conditions and 20 psi during emergencies such as firefighting, in violation of 30 TEX. ADMIN. CODE §§ 290.44(d) and 290.46(r).

- 28. As evidenced by Finding of Fact No. 2.aa., Respondent failed to provide a minimum pressure of 35 psi throughout the distribution system under normal operating conditions and 20 psi during emergencies such as firefighting, in violation of 30 TEX. ADMIN. CODE §§ 290.44(d) and 290.46(r).
- 29. As evidenced by Finding of Fact No. 2.bb., Respondent failed to post a legible sign at the Facility's production, treatment, and storage facilities that contains the name of the Facility and emergency telephone numbers where a responsible official can be contacted, in violation of 30 Tex. ADMIN. CODE § 290.46(t).
- 30. As evidenced by Finding of Fact No. 2.cc., Respondent failed to plug an abandoned public water supply well owned by the system with cement according to 16 Tex. ADMIN. CODE ch. 76, in violation of 30 Tex. ADMIN. CODE § 290.46(u).
- 31. As evidenced by Finding of Fact No. 2.dd., Respondent failed to ensure that the electrical wiring is securely installed in compliance with a local or national electrical code, in violation of 30 TEX. ADMIN. CODE § 290.46(v).
- 32. As evidenced by Finding of Fact No. 2.ee., Respondent failed to flush all dead-end mains at monthly intervals, in violation of 30 TEX. ADMIN. CODE § 290.46(I).
- 33. As evidenced by Findings of Fact Nos. 3 and 4, the Executive Director timely served Respondent with proper notice of the EDPRP, as required by TEX. WATER CODE § 11.0842, TEX. HEALTH & SAFETY CODE § 341.049, and 30 TEX. ADMIN. CODE § 70.104(b)(1).
- 34. As evidenced by Finding of Fact No. 5, Respondent failed to file a timely answer as required by TEX. WATER CODE § 11.0842, TEX. HEALTH & SAFETY CODE § 341.049, and 30 TEX. ADMIN. CODE § 70.105. Pursuant to TEX. WATER CODE § 11.0842, TEX. HEALTH & SAFETY CODE § 341.049, and 30 TEX. ADMIN. CODE § 70.106, the Commission may enter a Default Order against Respondent and assess the penalty recommended by the Executive Director.
- 35. Pursuant to TEX. WATER CODE § 11.0842(a) and TEX. HEALTH & SAFETY CODE § 341.049(a), the Commission has the authority to assess an administrative penalty against Respondent for violations of state statutes within TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 36. An administrative penalty in the amount of eight thousand eight hundred eighty-four dollars (\$8,884.00) is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 11.0842(c) and TEX. HEALTH & SAFETY CODE § 341.049(b).
- 37. TEX. WATER CODE §§ 5.102 and 7.002 authorize the Commission to issue orders and make determinations necessary to effectuate the purposes of the statutes within its jurisdiction.

ORDERING PROVISIONS

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

1. Respondent is assessed an administrative penalty in the amount of eight thousand eight hundred eighty-four dollars (\$8,884.00) for violations of state statutes and rules of the TCEQ. The payment of this penalty and Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this

Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations which are not raised here.

2. The penalty assessed by this Order shall be paid within 30 days after the effective date of this Order. All checks submitted to pay the penalty imposed by this Order shall be made out to TCEQ and shall be sent with the notation "Re: LASS WATER COMPANY INC; Docket No. 2015-1450-MLM-E" to:

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

- 3. Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Begin to operate the Facility under the direct supervision of a water works operator who holds a Class "D" or higher license, in accordance with 30 Tex. ADMIN. CODE § 290.46 (Conclusion of Law No. 3);
 - Develop and begin maintaining a written protocol that is to be followed to ensure that proper notification and boil water notices are provided to the customers of the Facility in the event of low distribution system pressure below 20 psi, water outages, positive microbiological samples, low chlorine residuals, or other conditions which indicate that the water supply may be compromised, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 4);
 - iii. Incorporate the flowchart identified in 30 TEX. ADMIN. CODE § 290.47(e) into the Facility's plant operations manual, conduct employee training, and implement the procedures outlined in the flowchart to ensure that all required boil water notices are provided to the customers of the Facility within 24 hours of a low distribution pressure event, water outage, positive *Escherichia coli* or fecal coliform sample, low chlorine residual, elevated finished water turbidity level, or other condition which indicates that the potability of the drinking water has been compromised, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusions of Law Nos. 4);
 - iv. Develop and begin maintaining a chemical and microbiological monitoring plan, in accordance with 30 TEX. ADMIN. CODE § 290.121 (Conclusion of Law No. 6);
 - Implement procedures to ensure that copies of all boil water notifications are submitted to the Executive Director, in accordance with 30 TEX. ADMIN. CODE §§ 290.46 and 290.122 (Conclusion of Law No. 7);
 - vi. Ensure that the wellhouse is locked during periods of darkness and when the plant is unattended, in accordance with 30 TEX. ADMIN. CODE § 290.41 (Conclusion of Law No. 9);
 - vii. Provide a full-face SCBA or supplied air respirator that meets OSHA standards for construction and operation, and a small bottle of fresh ammonia solution for testing for chlorine leakage readily accessible outside the chlorinator room and immediately available to the operator

in the event of an emergency, in accordance with 30 TEX. ADMIN. CODE § 290.42 (Conclusion of Law No. 12);

- viii. Compile and begin maintaining properly completed monthly water works operation and maintenance records, including but not limited to: the amount of each chemical used each week; the amount of water treated each week; the date, location, and nature of water quality, pressure, or outage complaints received by the system and the results of any subsequent complaint investigation; the maintenance records for water system equipment and facilities; the disinfectant residual monitoring results from the distribution system; the calibration records for flow meters; the results of microbiological analyses; the results of inspections for all water storage and pressure maintenance facilities; Consumer Confidence Report compliance documentation; the results of chemical analyses; copies of the Customer Service Inspection reports; and lead and copper tap water monitoring results, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 19);
- ix. Begin maintaining a supply of calcium hypochlorite on hand for use when making repairs, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 20);
- x. Begin maintaining a minimum pressure of 35 psi throughout the distribution system under normal operating conditions and a minimum pressure of 20 psi during emergencies such as firefighting, in accordance with 30 TEX. ADMIN. CODE §§ 290.44 and 290.46 (Conclusions of Law Nos. 27 and 28). This provision will be satisfied upon three months of weekly compliant pressure readings;
- xi. Provide a legible sign with the water supply name and an emergency telephone number where a responsible official can be contacted at each production, treatment, and storage facility, including but not limited to the well site and the water treatment plant, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 29);
- xii. Ensure that the electrical wiring is securely installed in compliance with a local or national electrical code in the wellhouse and the pump room, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 31; and
- xiii. Begin flushing all dead-end mains at monthly intervals, in accordance with 30 Tex. ADMIN. CODE § 290.46 (Conclusion of Law No. 32).
- b. Within 45 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 3.j. below, to demonstrate compliance with Ordering Provisions Nos. 3.a.i. through 3.a.ix. and 3.a.xi. through 3.a.xiii.
- c. Within 60 days after the effective date of this Order:
 - i. Provide impervious walls or partitions separating all mechanical and electrical equipment from the chlorine at the plant, in accordance with 30 TEX. ADMIN. CODE § 290.42 (Conclusion of Law No. 13);
 - ii. Provide high level and floor level screened vents for all rooms where chlorine gas is being stored or fed, in accordance with 30 TEX. ADMIN. CODE § 290.42 (Conclusion of Law No. 14);

- iii. Compile and begin maintaining a plant operations manual for operator review and reference, in accordance with 30 TEX. ADMIN. CODE § 290.42 (Conclusion of Law No. 15);
- Provide a device to readily determine air-water-volume for the pressure tank, in accordance with 30 Tex. ADMIN. CODE § 290.43 (Conclusion of Law No. 17);
- v. Initiate maintenance and good housekeeping practices including, but not limited to: repairing the interior and exterior walls and remove all signs of feces and debris at the wellhouse and the water treatment plant housing and ensuring the operational stability of the ground storage tank, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 22);
- vi. Begin maintaining all distribution system lines, storage and pressure maintenance facilities, water treatment units, and related appurtenances in a watertight condition, including but not limited to repairing the leak in the water treatment plant housing, in accordance with 30 Tex. ADMIN. CODE § 290.46 (Conclusion of Law No. 23); and
- vii. Begin maintaining all pumps, motors, valves, and other mechanical devices in good working condition, including repairing the service pumps, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 24).
- d. Within 75 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 3.j. below, to demonstrate compliance with Ordering Provisions Nos. 3.c.i. through 3.c.vii.
- e. Within 90 days after the effective date of this Order:
 - i. Prepare and adopt a complete drought contingency plan, in accordance with 30 TEX. ADMIN. CODE §§ 288.20 and 288.30 (Conclusion of Law No. 2);
 - Obtain a sanitary control easement that covers the land within 150 feet of the Facility's active well, in accordance with 30 Tex. ADMIN. CODE § 290.41 (Conclusion of Law No. 8);
 - iii. Provide an all-weather access road to the Facility's active well, in accordance with 30 TEX. ADMIN. CODE § 290.41 (Conclusion of Law No. 10);
 - Provide an all-weather access road for the Facility's water treatment plant, in accordance with 30 TEX. ADMIN. CODE § 290.42 (Conclusion of Law No. 11);
 - v. Repair the fence at the water-treatment plant such that it is intruderresistant and provide the pressure tank with an intruder-resistant fence or lockable building, in accordance with 30 TEX. ADMIN. CODE §§ 290.42 and 290.43 (Conclusion of Law No. 18);
 - vi. Adopt and maintain an adequate plumbing ordinance, regulations, or service agreement with provisions for proper enforcement to ensure that neither cross-connections nor other unacceptable plumbing practices are permitted, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 21); and

- vii. Ensure that well no. G0910143B is properly plugged with cement in accordance with 16 TEX. ADMIN. CODE ch. 76, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 30).
- f. Within 105 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 3.j. below, to demonstrate compliance with Ordering Provisions Nos. 3.e.i. through 3.e.vii.
- g. Within 135 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 3.j. below, to demonstrate compliance with Ordering Provisions No. 3.a.x.
- h. Within 180 days after the effective date of this Order:
 - i. Provide a minimum well capacity of 0.6 gpm per connection, in accordance with 30 TEX. ADMIN. CODE § 290.45 (Conclusion of Law No. 5);
 - ii. Provide an approved pressure tank which includes the required ASME name plate, in accordance with 30 TEX. ADMIN. CODE § 290.43 (Conclusion of Law No. 16);
 - Begin maintaining accurate and up-to-date detailed as-built plans or record drawings and specifications for the storage tank, pressure tank, and service pumps, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 25); and
 - iv. Begin maintaining well completion data such as well material setting data, geological log, sealing information (pressure cementing and surface protection), disinfection information, microbiological sample results, and a chemical analysis report of a representative sample of water from the well, in accordance with 30 TEX. ADMIN. CODE § 290.46 (Conclusion of Law No. 26).
- i. Within 195 days after the effective date of this Order, submit written certification, in accordance with Ordering Provision No. 3.j. below, to demonstrate compliance with Ordering Provisions Nos. 3.h.i. through 3.h.iv.
- j. The certifications required by these Ordering Provisions shall be accompanied by detailed supporting documentation, including photographs, receipts, and/or other records, shall be signed by Respondent, and shall include the following certification language:

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

The written certifications and supporting documentation necessary to demonstrate compliance with these Ordering Provisions shall be sent to:

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

and:

Section Manager, Public Drinking Water Section Water Supply Division, MC 155 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- 4. All relief not expressly granted in this Order is denied.
- 5. The provisions of this Order shall apply to and be binding upon Respondent. Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by Respondent shall be made in writing to the Executive Director. Extensions are not effective until Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
- 7. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to Respondent if the Executive Director determines that Respondent has not complied with one or more of the terms or conditions in this Order.
- 8. The provisions of this Order are deemed severable, and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
- 9. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 10. The Chief Clerk shall provide a copy of this fully executed Order to each of the parties. By law, the effective date of this Order shall be the date the Order is final, as provided by 30 TEX. ADMIN. CODE § 70.106(d) and TEX. GOV'T CODE § 2001.144.

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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

AFFIDAVIT OF RYAN RUTLEDGE

5000

STATE OF TEXAS

COUNTY OF TRAVIS

"My name is Ryan Rutledge. I am of sound mind, capable of making this affidavit, and the facts stated in this affidavit are within my personal knowledge and are true and correct.

On behalf of the Executive Director of the Texas Commission on Environmental Quality, the "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of LASS WATER COMPANY INC" (the "EDPRP") was filed in the TCEQ Chief Clerk's office on March 31, 2016.

The EDPRP was mailed to Respondent's last known address on March 31, 2016, via certified mail, return receipt requested, postage prepaid. According to USPS.com "Track & Confirm" delivery confirmation records, Respondent received notice of the EDPRP on April 2, 2016.

More than 20 days have elapsed since Respondent received notice of the EDPRP. Respondent failed to file an answer and failed to request a hearing."

Ryan Rutledge, Staff Attorney Office of Legal Services, Litigation Division Texas Commission on Environmental Quality

Before me, the undersigned authority, on this day personally appeared Ryan Rutledge, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes and consideration herein expressed.

Subscribed and sworn to before me on this $\frac{3^{\alpha}}{2}$ day of $\frac{1}{100}$, A.D. 2016.



Notary without Bond

Notary Public, State of Texas