

Orbit Systems, Inc.  
1302 Airline North  
Rosharon TX 77583  
(281) 369-2041

October 15, 2012

Mr. Joseph Reza  
TCEQ  
Region 12  
5425 Polk Avenue, Suite H  
Houston, Texas 77023-1486

Dear Mr. Reza:

**Subject: Compliance Evaluation Investigation at Beechwood Wastewater Treatment Plant;  
TCEQ ID No.: WQ0012113-001; EPA ID NO.: TX0079260**

On October 3, 2012, a sewer survey was conducted at the Beechwood Wastewater Treatment Plant. The following actions were taken as a result of the investigation:

1. **Late submittal on DMRs:** I have reviewed Self-Reporting requirements and am aware that a monthly effluent report shall be submitted each month, to the Enforcement Division (MC 224), by the 20<sup>th</sup> day of the following month for each discharge described by the permit.
2. **Loose barbed wire on fence/heavy vegetation:** Barbed wire above fencing is being tightened as heavy vegetation is being cleared at both Beechwood WWTP and Angle Acres WWTP. This should be completed by 10/31/12. See attached Work Order # 26512 and photo for documentation.
3. **Calculate lbs/day using arithmetic average:** Discharge Monitoring Reports (DMRs) from August 2012 to present were modified to report "daily average concentration (lbs/day) as the arithmetic average of all effluent samples (grab as required by permit) within a period of one calendar month, consisting of at least four separate representative measurements. A sample calculation from August 2012 is attached to show compliance.
4. **DPD-Chlorine Secondary Standards kit:** Attached is the DPD-Chlorine Secondary Standards Kit label with expiration date of Jul-14

Thank you for your assistance during the compliance evaluation investigation. If you have any questions or require further information regarding these actions, please contact me at the above address or telephone (281) 369-2041.

Sincerely,



Peggy Paul  
Orbit Systems, Inc

## TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

|                            |  |                                 |  |                                       |  |                           |  |
|----------------------------|--|---------------------------------|--|---------------------------------------|--|---------------------------|--|
| Regulated Entity/Site Name |  | Orbit Systems, Inc.             |  | TCEQ Add. ID No.<br>RN No. (optional) |  | 12115-0001                |  |
| Investigation Type         |  | CCI Contact Made In-House (Y/N) |  | Purpose of Investigation              |  | P541                      |  |
| Regulated Entity Contact   |  | Peggy Paul<br>President         |  | Telephone No.                         |  | 781-369-2041              |  |
| Title                      |  | President                       |  | Fax No.                               |  | Date Contacted<br>9/27/12 |  |
|                            |  |                                 |  | Date Faxed                            |  |                           |  |

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and does not represent final TCEQ findings related to violations. Any potential or alleged violations discovered after the date on this form will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

| Issue |                   | For Records Request: identify the necessary records, the company contact and date due to the agency.<br>For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully describe. |  |
|-------|-------------------|--|--|
| No.   | Type <sup>1</sup> | Rule Citation (if known)   | Description of Issue   |
| 1     | AV                |  | Late submission on DMAs                                      |
| 2     | AV                |  | Loose parked wire on fence / Missing vegetation info on site |
| 3     | AV                |  | Calculating lbs/deny using arithmetic. How compare to...     |
| 4     | PLC               |  | Standard VIT   |
|       |                   |  |  |
|       |                   |  |  |

Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

|   |                              |  |
|---|------------------------------|--|
| Did the TCEQ document the regulated entity named above operating without proper authorization?              | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Did the investigator advise the regulated entity representative that continued operation is not authorized? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

**Document Acknowledgment.** Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

|  |  |                 |   |                 |
|--|--|-----------------|---|-----------------|
|  | Investigator Name (Signed & Printed)<br>Soyak & Paul | Date<br>10/3/12 | Regulated Entity Representative Name (Signed & Printed)<br>Peggy Paul | Date<br>10/4/12 |
|--|--|-----------------|---|-----------------|

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information call 512-230-4282

IST: 49

ORBIT SYSTEMS

Work Order #: 26512

ATE:10/11/2012

Work Order

1st COPY

Page: 1

cct#: 1-25-00325-00

Home Phone:

/Adr: BEECHWOOD DRIVE

Department: TCEQ

Name: BEECHWOOD SEWER PLANT

ate Received: 10/11/2012

Time:13:44PM

Prepared By: PEGGY PAUL

ate Scheduled: \_\_/\_\_/\_\_

Time:\_\_:\_\_AM/PM

Dispatched:

ype of Work Order (W ) : W Response to Invest. (sewer)

orms Selected : 9

Status: (C)lose, (V)oid: \_\_\_\_\_

eed to clear brush and vegetation from around sewer plant fencing.

eed to tighten barbed wire at top of security fencing.

omp. Date: \_\_/\_\_/\_\_

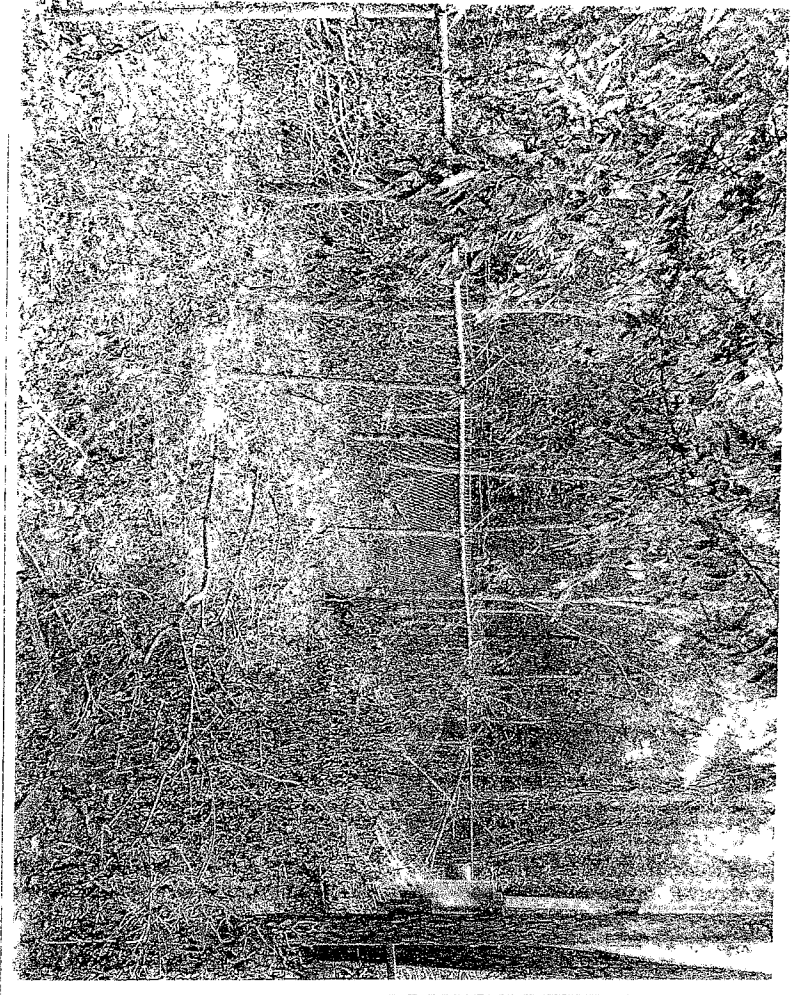
Time: \_\_:\_\_ AM / PM

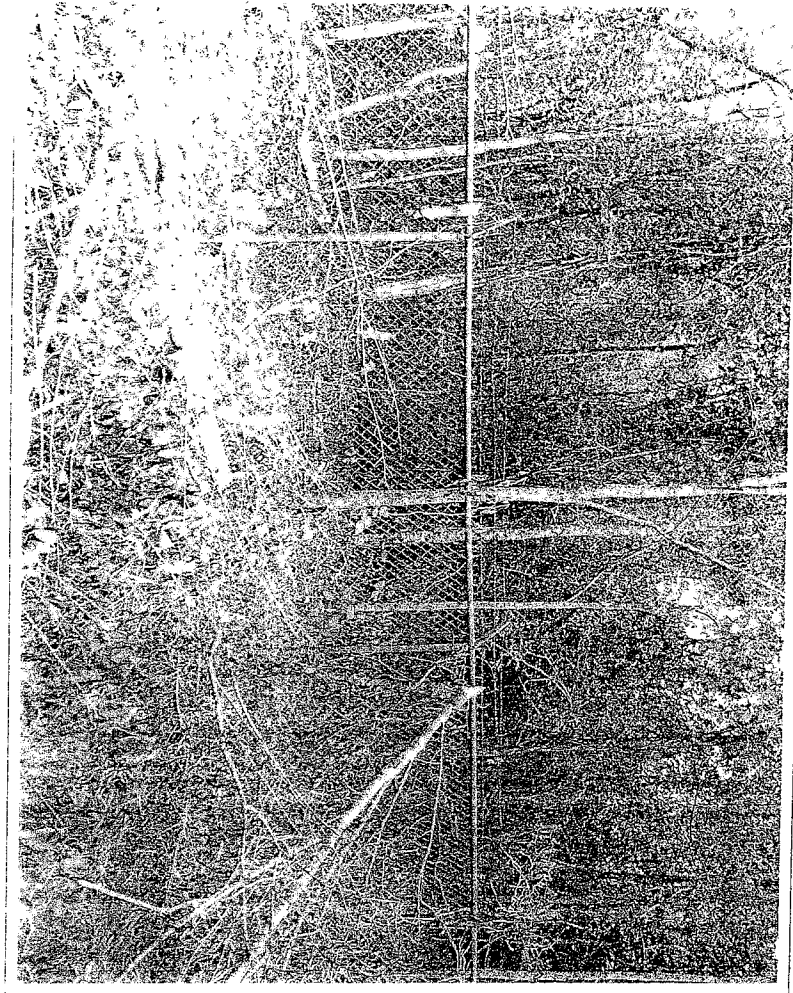
By: \_\_\_\_\_

*Work in progress.*

*Should be completed*

*by 11/31/12.*





| DATE | FLOW (MG/DAY) | SAMPLE FLOW (MG/DAY) | SAMPLE % FLOW | BOD (MG/L) | FLOW AVG BOD (MG/L) | BOD (LB/DAY) | FLOW AVG BOD (LB/DAY) | TSS (MG/L) | FLOW AVG TSS (MG/L) | TSS (LB/DAY) | FLOW AVG TSS (LB/DAY) | CL2  | COR CL2 | DO  | PH   | NH3-N | FLOW AVG NH3-N (MG/L) | NH3-N (LB/DAY) | FLOW AVG NH3-N (LB/DAY) |     |
|------|---------------|----------------------|---------------|------------|---------------------|--------------|-----------------------|------------|---------------------|--------------|-----------------------|------|---------|-----|------|-------|-----------------------|----------------|-------------------------|-----|
|      |               |                      |               |            |                     |              |                       |            |                     |              |                       |      |         |     |      |       |                       |                |                         | MIN |
| 1    | 0.2           | 0.0165               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0            | 0.0000                |      |         |     |      |       |                       |                |                         |     |
| 2    | 0.15          | 0.0081               | 0.0081        | 3          | 0.4969              | 0            | 0.2027                | 5.2        | 0.8613              | 0.3513       | 0.0582                | 3.3  | 3.11    |     |      |       | 0.100                 | 0.0000         | 0                       |     |
| 3    | 0.3           | 0.0454               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                | 3.3  | 3.12    |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 4    |               | 0.0000               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 5    | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 6    | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 7    | 0.2           | 0.0165               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 8    | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 9    | 0.15          | 0.0081               | 0.0081        | 2          | 0.3313              | 0            | 0.1351                | 4.5        | 0.7454              | 0.3040       | 0.0504                | 2.2  | 2.04    |     |      |       | 0.100                 | 0.0000         | 0                       |     |
| 10   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 11   |               | 0.0000               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 12   |               | 0.0000               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 13   | 0.18          | 0.0127               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 14   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 15   | 0.2           | 0.0165               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 16   | 0.15          | 0.0081               | 0.0081        | 3          | 0.4969              | 0            | 0.2027                | 5.2        | 0.8613              | 0.3513       | 0.0582                | 2.7  | 2.57    |     |      |       | 0.420                 | 0.0696         | 0.028373                |     |
| 17   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 18   |               | 0.0000               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 19   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 20   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 21   | 0.25          | 0.0288               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 22   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 23   | 0.15          | 0.0081               | 0.0081        | 2          | 0.3313              | 0            | 0.1351                | 8.8        | 1.4577              | 0.5945       | 0.0985                | 2.3  | 2.15    |     |      |       | 0.100                 | 0.0168         | 0.006755                |     |
| 24   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 25   |               | 0.0000               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 26   |               | 0.0000               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 27   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 28   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 29   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| 30   | 0.2           | 0.0165               | 0.0165        | 2          | 0.6748              | 0            | 0.2752                | 8.4        | 2.8344              | 1.1559       | 0.3900                | 2.9  | 2.67    |     |      |       | 0.100                 | 0.0337         | 0.013761                |     |
| 31   | 0.15          | 0.0081               | 0.0000        |            |                     | 0            | 0.0000                |            |                     | 0.0000       | 0.0000                |      |         |     |      |       | 0.0000                | 0.0000         | 0                       |     |
| #    | 23            | 23                   |               | 5          |                     | 5            |                       | 5          |                     | 5            |                       | 5    |         | 5   |      |       | 5                     |                | 5                       |     |
| AVG  | 0.171         | 0.0123               |               | 2.4        |                     | 0.1902       |                       | 6.42       |                     | 0.5514       |                       | MIN  | 1.52    | 8.3 | 7.80 |       | 0.1640                |                | 0.0125                  |     |
| MAX  | 0.3           | 0.0454               |               | 3          |                     |              |                       | 8.8        |                     |              |                       | MAX  | 3.25    |     |      |       | 0.42                  |                | 0.0127                  |     |
| SUM  |               |                      | 0.0489        |            |                     |              |                       |            | 6.7601              |              | 0.6552                | #MAX | 0       |     |      |       |                       |                |                         |     |

1 1/2 day arithmetic avg.

1 1/2 day arithmetic

1 1/2 day arithmetic



TEXAS COMMISSION  
ON ENVIRONMENTAL QUALITY

User: peggy@orbitalwater.net, Permittee User

View Certification | Download COR | View CDR | Download COR Sign. Public Key

Permit #: TX0079260

Permittee: ORBIT SYSTEMS, INC

Permittee Address: 7132 GREEN TREE DR, 0.5MI W ST ANGLETON, TX 77515

Facility: BEECHWOOD WWTF  
7132 GREEN TREE DR, 0.5MI W ST HWY 288 ANGLETON, TX 77515

Permitted Feature: 001 External Outfall

Discharge: 001-A DOMESTIC FACILITY 001

Monitoring Period: From 08/01/12 to 09/31/12

DMR Due Date: 09/20/12

Status: NetDMR Validated

Considerations for Form Completion

FOR AMMONIA-NITROGEN SEE OTHER REQUIREMENT NO. 5 ON PAGE 23 OF THE PERMIT. TPDES 12113-001

Principal Executive Officer

First Name: Peggy

Last Name: Paul

No Data Indicator (NODI)

Title: Engineer

Telephone: 281-369-2041

| Parameter Code | Monitoring Location | Season # | Param. NODI | Qualifier 1 | Value 1 | Qualifier 2 | Value 2 | Qualifier 3 | Value 3 | Unit | # of Analytes | Frequency | Sample |
|----------------|---------------------|----------|-------------|-------------|---------|-------------|---------|-------------|---------|------|---------------|-----------|--------|
|----------------|---------------------|----------|-------------|-------------|---------|-------------|---------|-------------|---------|------|---------------|-----------|--------|

|       |                        |                    |   |   |        |   |         |   |     |      |   |                |           |
|-------|------------------------|--------------------|---|---|--------|---|---------|---|-----|------|---|----------------|-----------|
| 00300 | Oxygen, dissolved (DO) | 1 - Effluent Gross | 0 | 1 | 0.1902 | 1 | 26.1b/d | 1 | 8.3 | mg/L | 1 | 01/07 - Weekly | GR - GRAB |
|-------|------------------------|--------------------|---|---|--------|---|---------|---|-----|------|---|----------------|-----------|

|       |                       |                    |   |   |    |   |         |   |          |      |   |                |           |
|-------|-----------------------|--------------------|---|---|----|---|---------|---|----------|------|---|----------------|-----------|
| 00310 | BOD, 5-day, 20 deg. C | 1 - Effluent Gross | 0 | 1 | 17 | 1 | 26.1b/d | 1 | 2 MO MIN | mg/L | 1 | 01/07 - Weekly | GR - GRAB |
|-------|-----------------------|--------------------|---|---|----|---|---------|---|----------|------|---|----------------|-----------|

|       |    |                    |   |   |     |   |    |   |   |         |   |                 |           |
|-------|----|--------------------|---|---|-----|---|----|---|---|---------|---|-----------------|-----------|
| 00400 | pH | 1 - Effluent Gross | 0 | 1 | 7.8 | 1 | 20 | 1 | 5 | MINIMUM | 1 | 01/30 - Monthly | GR - GRAB |
|-------|----|--------------------|---|---|-----|---|----|---|---|---------|---|-----------------|-----------|

*Approved by:*  
*[Signature]*  
10/11/2012

Information from data for validation work/standards/aim submit from kmr? flow: Transition Row = 66/621112 1787 7627 80 10/11/2012

| Parameter<br>Code | Parameter<br>Name                                    | Monitoring<br>Location | Season<br># | Param.<br>NODI | Quantity or Loading                         |                                     |                |            | Quality or Concentration |                                     |                |                             | #<br>of<br>Excursions | Frequency<br>of<br>Analysis | Type                        |                |
|-------------------|--|------------------------|-------------|----------------|---|-------------------------------------|----------------|------------|--------------------------|-------------------------------------|----------------|-----------------------------|-----------------------|-----------------------------|-----------------------------|----------------|
|                   |  |                        |             |                | Qualifier<br>1                              | Value<br>1                          | Qualifier<br>2 | Value<br>2 | Qualifier<br>3           | Value<br>3                          | Qualifier<br>4 | Value<br>4                  |                       |                             |                             |                |
| 00530             | Solids,<br>total<br>suspended                        | 1 - Effluent<br>Gross  | 0           | --             | Sample =<br>Permit<br>Req.<br>Value<br>NODI | 0.5514<br>17<br>DAILY<br>AV         | 1              | 26<br>lb/d | 1                        | 6.42<br>20<br>DAILY<br>AV           | 2              | 8.8<br>65<br>SINGGRAB       | 19<br>mg/L            | 0                           | 01/07 -<br>Weekly           | GR -<br>GRAB   |
| 00610             | Nitrogen,<br>ammonia<br>total (as<br>N)              | 1 - Effluent<br>Gross  | 0           | --             | Sample =<br>Permit<br>Req.<br>Value<br>NODI | 0.0125<br>Req<br>Mon<br>DAILY<br>AV | 1              | 26<br>lb/d | 1                        | 0.164<br>Req<br>Mon<br>DAILY<br>AV  | 2              | 0.42<br>Req Mon<br>SINGGRAB | 19<br>mg/L            | 0                           | 01/07 -<br>Weekly           | GR -<br>GRAB   |
| 50050             | Flow, in<br>conduit or<br>thru<br>treatment<br>plant | 1 - Effluent<br>Gross  | 0           | --             | Sample =<br>Permit<br>Req.<br>Value<br>NODI | 0.0123<br>1<br>DAILY<br>AV          | 1              | 0.3<br>MGD | 1                        | 0.0454<br>Req<br>Mon<br>DAILY<br>MX | 2              | 0.3<br>MGD                  | 0.3<br>MGD            | 0                           | 05/WK -<br>Five Per<br>Week | IN -<br>INSTAN |
| 50060             | Chlorine,<br>total<br>residual                       | 1 - Effluent<br>Gross  | 0           | --             | Sample =<br>Permit<br>Req.<br>Value<br>NODI | 1.52<br>1 MO<br>MIN                 | 1              | >          | 1                        | 3.25<br>4 MO MAX                    | 2              | 19<br>mg/L                  | 19<br>mg/L            | 0                           | 05/WK -<br>Five Per<br>Week | GR -<br>GRAB   |

**Submission Note**  
If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

**Field Check Errors**  
No errors.  
Comments

**Attachments**  
No attachments.  
Report last Saved By  
GREG SYSTEMS, INC.  
User:  
Name:  
E-Mail:  
peggy@orbitwater.net  
Peggy Paul  
peggy@orbitwater.net

**Certification Statement**  
Date/Time: 2012-10-11 12:58 (Time Zone -05:00)



I certify under penalty of law that this submission was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are criminal penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. By entering my password and security question answer and pressing the Submit button, I agree that:

1. I am Peggy Paul.
2. I have not violated any term in my Electronic Signature Agreement.
3. I am otherwise without any reason to believe that the confidentiality of my password has been compromised now or at any time prior to this submission.
4. I have the authority to submit these data on behalf of the listed facilities.
5. This action constitutes an electronic signature equivalent to my written signature.
6. I understand that this attestation of fact pertains to the implementation, oversight, and enforcement of a federal environmental program and must be true to the best of my knowledge

**Submission Information**

|                            |  |               |                                      |
|----------------------------|--|---------------|--------------------------------------|
| Name:                      | Peggy Paul   | Date/Time:    | 2012-10-11 12:58 (Time Zone: -05:00) |
| User:                      | peggy@orbitwater.net   | E-Mail:       | peggy@orbitwater.net                 |
| Submitter Telephone:       | 281-369-2041   | Submitter Ip: | 75.148.161.249                       |
| Confirmation Code:         | 4c79e395-c436-4539-a40f-ed364b0db5e6                             |               |                                      |
| Submitter Hashed Password: | 225cc05a5a7e2dc5bc5b4ac6f294aef89b156da158320915706af98a4b64aa   |               |                                      |
| DMR Hash:                  | 090afb989d4e8dc91192aed67c9e126f61cebdecd4bb29c80d004ed435f75rb5 |               |                                      |
| NetDMR Certificate Id:     | 4  |               |                                      |
| Certificate Alias:         | netdmr_val sample certificate 2                                  |               |                                      |

\*\*\*\*\*  
 03008: NetDMR  
 \*\*\*\*\*  
 1. Test Subject Page for utilities to facilitate testing

**SPEC** <sup>TM</sup> **COLOR STANDARD**

**DPD-CHLORINE-LR  
SECONDARY STANDARDS KIT**

*for Instrument Performance Verification of  
Hach Colorimeters and Spectrophotometers*

STORE KIT IN THE UPRIGHT POSITION  
EXP date is valid for storage at 10° - 25° C  
CAT NO 26353-00

AR1004A



HACH COMPANY  
WORLD HEADQUARTERS  
P.O. Box 389  
Loveland, CO 80538 U.S.A.  
Tel (970) 669-3050



Lot A2207C  
Exp Jul - 14

IST: 49

ORBIT SYSTEMS

Work Order #: 26512

2nd COPY

ATE:11/14/2012

Work Order

Page: 1

=====  
cct#: 1-25-00325-00

Home Phone:

/Adr: BEECHWOOD DRIVE

Department: TCEQ

Name: BEECHWOOD SEWER PLANT

ate Received: 10/11/2012

Time:13:44PM

Prepared By: PEGGY PAUL

ate Scheduled: 11/15/2012

Time: 1:00 PM

Dispatched: Tony Kern

ype of Work Order (W ) : W Response to Invest. (sewer)

orms Selected : 9

Status: (C)lose, (V)oid: CLOSE

eed to clear brush and vegetation from around sewer plant fencing.

eed to tighten barbed wire at top of security fencing.

*Completed by John Carlock 11/14/12*

omp. Date:11/14/12

Time: 1:00 PM

By: John Carlock

**ATTACHMENT 12**

**SYSTEMS OPERATING AT 85% OR GREATER MINIMUM STANDARD CAPACITY**

**EXPLANATION PLUS WAIVERS**

**ORBIT SYSTEMS, INC.**

# Waiver Requests for Subdivisions exceeding 85% minimum standard capacity

## System

Coronado Country

Colony Cove

Country Meadows

Blue Sage

Demi-John Island

Televue Terrace

Wilco Water

[

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

July 22, 2008

Ms. Jane Brem, President  
Orbit Systems, Inc.  
1302 Airline North  
Rosharon, Texas 77583-7718

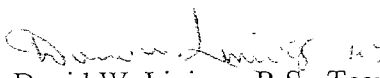
Re: Comprehensive Compliance Investigation at:  
Coronado Country, 4630 Apache Trail, Pearland, Brazoria County, Texas  
TCEQ ID No. 0200275

Dear Ms. Brem:

On June 12, 2008 Mrs. Amy Branom of the Texas Commission on Environmental Quality (TCEQ), Houston Region Office, conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply systems. During the investigation, the investigator notified you of some apparent instances of noncompliance. You have provided us with information which appears to indicate that these problems have been corrected. However, please see the attached Summary of Investigation Findings for an additional issue. Please be aware that additional violations may be documented based upon further review of records or self-reporting.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mrs. Amy Branom in the Houston Region Office at (713)767-3650.

Sincerely,

  
David W. Livings, R.S., Team Leader  
Public Water Supply  
Houston Region Office

DWL/AJB/ra

cc: Brazoria County Environmental Health Department

CORONADO COUNTRY  
4630 APACHE TRL  
PEARLAND, BRAZORIA COUNTY, TX 77584

Investigation # 680684  
Investigation Date: 06/12/2008

Additional ID(s): 0200275

**ALLEGED VIOLATION(S) NOTED AND RESOLVED  
ASSOCIATED TO A NOTICE OF VIOLATION**

Track No: 339570  
30 TAC Chapter 290.46(m)(4)

**Alleged Violation:**

Investigation: 680684

Comment Date: 07/15/2008

Water Leakage

Failure to maintain all related appurtenances in a watertight condition. In this connection, the leaking Schrader valve located at the well must be repaired or replaced as necessary.

At the time of the investigation, it was noted that the system was not in watertight condition due to a leaking Schrader valve.

**Recommended Corrective Action:** Submit a photo, receipt, invoice or work order to show the leaking Schrader valve has been repaired or replaced to verify compliance.

**Resolution:** The regulated entity submitted a copy of a work order showing that the Schrader valve was replaced to verify compliance.

**AREA OF CONCERN**

Track No: 339545  
30 TAC Chapter 290.46(m)(6)

**Alleged Violation:**

Investigation: 680684

Comment Date: 07/15/2008

Operating Practices for Public Water Systems

Failure to properly maintain the regulated entity by not ensuring the polyphosphate and chlorinator pumps are in good working condition.

At the time of the investigation, the polyphosphate pump and chlorinator pump did not operate when the well was operational.

**Recommended Corrective Action:** Submit receipt, invoice or work order to show the polyphosphate and chlorinator pumps for well #2 have been repaired or replaced as necessary to verify compliance.

**Resolution:** The regulated entity submitted a copy of a work order to show the polyphosphate and chlorinator pumps were replaced to verify compliance.

Track No: 339554  
30 TAC Chapter 290.41(c)(3)(K)

**Alleged Violation:**

Investigation: 680684

Comment Date: 07/15/2008

Ground Water Sources and Development

**ADDITIONAL ISSUES**

**Description**

Other violations noted during the investigation?  
(If non-compliant then describe violation in the comment section.)

**Additional Comments**

30 Tex. Admin. Code , Subchapter F, §291.93(3)  
Certificate of Convenience and Necessity

After any field inspection, a retail public utility must analyze the system's capacity to determine if it has reached 85% of its capacity. If the retail public utility has reached 85% of its capacity, it must file this report no later than 90 days after the date of a commission letter detailing the results of the inspection. Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage, or pumping. Specifically, it is noted that your system has reached 95% of its pressure tank capacity.

This information was based on 38 connections and calculated as follows. The required pressure tank capacity is 50 gallons per connection X 38 connections = 1,900 gallons per connection. At the time of the inspection, your (2) 1,000 gallon pressure tanks provided a total of 2,000 gallons. The required 1,900 gallons per minute pressure tank capacity divided by the provided 2,000 gallons capacity = 95 %.

Your system is required to submit an 85% planning report to Central Office within 90 days.



**ORBIT SYTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TX 77583  
(281) 369-2041**

August 4, 2008

TCEQ Executive Director  
Public Drinking Water Section - MC 155  
Water Permits & Resource Management Division  
PO Box 13087  
Austin, TX 78711-3087

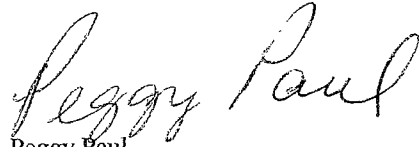
Subject: Request for Waiver of Reporting Requirements for Expected Service Demands  
Coronado Country Subdivision, PWS ID No.0200275; Brazoria County TX

Dear Sir or Madam:

This is to request a waiver of reporting requirements for expected service demands at Coronado Country Subdivision. The water system has exceeded 85% of pressure tank capacity. Subdivision has 38 active connections with 2000 gallons pressure tank capacity. This provides 52.6 gallons per connection, which exceeds the 85% capacity rule. However, no further growth is anticipated for the water system.

If you have any questions or require further information, please contact me at the above address or telephone number.

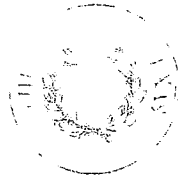
Sincerely,



Peggy Paul  
Orbit Systems, Inc.

Cc: Ms. Amy Branom, TCEQ Region 12

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



PWS ID #0200275 CO

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 21, 2008

MS. PEGGY PAUL  
ORBIT SYSTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TEXAS 77583

Re: Coronado Country - Public Water System I.D. #0200275  
85% Capacity Planning Report  
Engineer Contact Telephone: (281) 369-2041  
Plan Review Log Number 200808-073  
Brazoria County, Texas

CN600625198; RN101196319

Dear Ms. Paul:

The 85% Capacity Planning Report received on August 08, 2008 with your letter dated August 4, 2008 has been reviewed. The report indicates that the water system has generally complied with Chapter 291 93(3), Subchapter F of our Rules

The water system currently has 38 active connections and, according to your letter, all current capacities are above the minimum requirements. The existing pressure tank is operating at 95% of the required capacity. Since there has been no growth in the system and the subdivision is fully built out, Orbit Systems, Inc., does not plan to increase pressure tank capacity.

Please refer to the Utilities Technical Review Team's Log No. 200808-073 in all correspondence for this project. This will help complete our review and prevent it from being considered a new project

Please complete a copy of the most current Public Water System Plan Review Submittal form for future submittal to TCEQ for review of improvements to a Public Water System. Every blank on the form must be completed to minimize any delays in review of your project. The document is available on our WEB site at the address shown below.

<http://www.tceq.state.tx.us/assets/public/permitting/forms/10233.pdf>

Ms. Peggy Paul  
Page 2  
August 21, 2008

For future reference, you can review part of the Utilities Technical Review Team's database to see if we have received your project. This is available on the TCEQ's homepage on the Internet at the following address:

[http://www.tceq.state.tx.us/assets/public/permitting/watersupply/ud/planrev\\_list.pdf](http://www.tceq.state.tx.us/assets/public/permitting/watersupply/ud/planrev_list.pdf)

You can download the well construction and completion data checklists and the latest revision of Chapter 290 "Rules and Regulations for Public Water Systems" from this site:

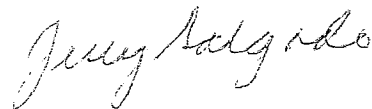
[http://www.tceq.state.tx.us/permitting/water\\_supply/ud/planrev.html](http://www.tceq.state.tx.us/permitting/water_supply/ud/planrev.html)

If you have any questions please contact me at (512)239-0680 or the Internet address: "KADHIKAR@tceq.state.tx.us" or if by correspondence, include MC 153 in the letterhead address below.

Sincerely,



Kamal Adhikari, E.I.T.  
Utilities Technical Review Team  
Water Supply Division MC-153  
Texas Commission on Environmental Quality



Jerry Salgado, P.E.  
Utilities Technical Review Team  
Water Supply Division MC-153  
Texas Commission on Environmental Quality

KA/JAS/lm

cc: Coronado Country - Attn.: Water Utilities Official, 1302 Airline North, Rosharon, Texas  
77583

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by ~~Reducing~~ and Preventing Pollution  
July 22, 2008

*FB*  
**CERTIFIED MAIL #7002 2030 0003 4747 3149**  
**RETURN RECEIPT REQUESTED**

Ms. Jane Brem, President  
Orbit Systems, Inc.  
1302 Airline North  
Rosharon, Texas 77583-7718

Re: Comprehensive Compliance Investigation at:  
Colony Cove Subdivision Water System 2311 Colony Cove, Rosharon, Brazoria Co, Tx  
TCEQ ID No. 0200324

Dear Ms. Brem:

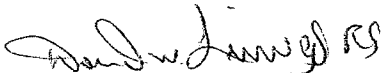
On June 12, 2008, Mrs. Amy Branom of the Texas Commission on Environmental Quality (TCEQ), Houston Region Office, conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply systems. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted which were alleged noncompliances that have been resolved through notification and subsequent corrective action. In addition, a certain outstanding alleged violation was identified for which compliance documentation is required. Please submit to this office by August 8, 2008 a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for the outstanding alleged violation.

The Texas Commission on Environmental Quality appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violation as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the Houston Region Office within 10 days from the date of this letter. At that time, Mr. David W. Livings, PWS Team Leader, will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of the contested violation.

Ms. Jane Brem, President  
Page 2  
July 22, 2008

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Amy Branom in the Houston Region Office at (713)767-3650.

Sincerely,



David W. Livings, R.S., Team Leader  
Public Water Supply  
Houston Region Office

DWL/AJB/ra

cc: Brazoria County Environmental Health Department

**ADDITIONAL ISSUES****Description**

Other violations noted during the investigation?  
(If non-compliant then describe violation in the  
comment section.)

**Additional Comments**

30 Tex. Admin. Code , Subchapter F, §291.93(3)  
Certificate of Convenience and Necessity

After any field inspection, a retail public utility must analyze the system's capacity to determine if it has reached 85% of its capacity. If the retail public utility has reached 85% of its capacity, it must file this report no later than 90 days after the date of a commission letter detailing the results of the inspection. Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage, or pumping. Specifically, it is noted that your system has reached 92% of its pressure capacity.

This information was based on 46 connections and calculated as follows. The required pressure capacity is 50 gallons per connection X 46 connections = 2,300 gallons. At the time of the inspection, your system provided (2) 1,250 gallon pressure tanks which total 2,500 gallons of pressure tank capacity. The required 2,300 gallon capacity divided by the provided 2,500 gallons = 92%

Your system is required to submit an 85% planning report to Central Office within 90 days.

**ORBIT SYTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TX 77583  
(281) 369-2041**

August 18, 2008

TCEQ Executive Director  
Public Drinking Water Section - MC 155  
Water Permits & Resource Management Division  
PO Box 13087  
Austin, TX 78711-3087

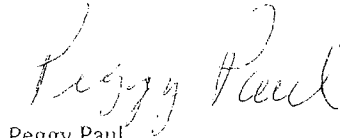
Subject: Request for Waiver of Reporting Requirements for Expected Service Demands  
Colony Cove Subdivision, PWS ID No.0200324; Brazoria County TX

Dear Sir or Madam:

This is to request a waiver of reporting requirements for expected service demands at Colony Cove Subdivision. The water system has exceeded 85% of pressure tank capacity. Subdivision has 46 active connections with 2500 gallons pressure tank capacity. This provides 54.3 gallons per connection, which exceeds the 85% capacity rule. However, no further growth is anticipated for the water system.

If you have any questions or require further information, please contact me at the above address or telephone number.

Sincerely,



Peggy Paul  
Orbit Systems, Inc

Cc Ms Amy Branom, TCEQ Region 12

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*

PWS ID #0200324 CO

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 22, 2008

MS PEGGY PAUL  
ORBIT SYSTEMS INC  
1302 AIRLINE NORTH  
ROSHARON TX 77583-7718

Re: COLONY COVE SUBDIVISION WATER SYSTEM - Public Water System I.D. #0200324  
85% Planning Report  
Engineer Contact Telephone: (281) 369-2041  
Plan Review Log Number 200809-047  
Brazoria County, Texas

CN600625198; RN101192722

Dear Ms. Paul:

The 85% Rule Report received on September 2, 2008 with your letter dated August 18, 2008 has been reviewed. The report indicates that the water system has generally complied with Chapter 291.93(3). Subchapter F of our Rules.

The water system currently has 46 active connections and, according to your letter, all required capacities except pressure tank capacity are below 85% of existing capacities. You have indicated that the pressure tank capacity is 2,500 gallons. Required pressure tank capacity is 2,300 gallons which is 92% of existing capacity. No further growth in the system is expected.

Please refer to the Utilities Technical Review Team's Log No. 200809-047 in all correspondence for this project. This will help complete our review and prevent it from being considered a new project

Please complete a copy of the most current Public Water System Plan Review Submittal form for future submittal to TCEQ for review of improvements to a Public Water System. Every blank on the form must be completed to minimize any delays in review of your project. The document is available on our WEB site at the address shown below.

<http://www.tceq.state.tx.us/assets/public/permitting/forms/10233.pdf>

For future reference, you can review part of the Utilities Technical Review Team's database to see if we have received your project. This is available on the TCEQ's homepage on the Internet at the



MS PEGGY PAUL  
Page 2  
September 22, 2008

following address:

[http://www.tceq.state.tx.us/assets/public/permitting/watersupply/ud/planrev\\_list.pdf](http://www.tceq.state.tx.us/assets/public/permitting/watersupply/ud/planrev_list.pdf)

You can download the well construction and completion data checklists and the latest revision of Chapter 290 "Rules and Regulations for Public Water Systems" from this site:

[http://www.tceq.state.tx.us/permitting/water\\_supply/ud/planrev.html](http://www.tceq.state.tx.us/permitting/water_supply/ud/planrev.html)

If you have any questions please contact me at (512)239-0405 or the Internet address: "DLAUGHLI@tceq.state.tx.us" or if by correspondence, include MC 153 in the letterhead address below.

Sincerely,



David D. Laughlin, P.E.  
Utilities Technical Review Team  
Water Supply Division MC-153  
Texas Commission on Environmental Quality

DDL/lm

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Glenn Shankle, *Executive Director*

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 12, 2008

Ms. Jane Brem, President  
Orbit Systems, Inc.  
1302 Airline North  
Rosharon, Texas 77583-7718


Re: Comprehensive Compliance Investigation at:  
Country Meadows, 46 Country Meadows, Brazoria County, Texas  
TCEQ ID No. 0200273

Dear Ms. Brem:

On April 15, 2008, Mr. Cliff Sheffield of the Texas Commission on Environmental Quality (TCEQ), Houston Region Office, conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply systems. During the investigation, the investigator notified you of some apparent instances of noncompliance. You have provided us with information which appears to indicate that these problems have been corrected. No further response from you is necessary concerning this investigation. Please be aware that additional violations may be documented based upon further review of records or self-reporting.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Cliff Sheffield in the Houston Region Office at (713)767-3650.

Sincerely,

  
David W. Livings, R.S., Team Leader  
Public Water Supply  
Houston Region Office

DWL/CTS/ra

cc: Brazoria Co. Environmental Health Dept.

Investigation: 650597

Comment Date: 06/09/2008

**Disinfection**

Failure to maintain the lid of the hypochlorination solution container completely covered and sealed to prevent the entrance of dust, insects, and other contaminants.

Description: The top of the hypochlorite solution container for the south well had a gap of up to ¼ inch (estimated) around the hypochlorite pump suction line.

**Recommended Corrective Action:** Seal the gap in the top of the hypochlorite solution container to prevent the entrance of dust, insects, and other contaminants. Submit a photo, receipt, invoice, or properly completed work order to verify compliance.

**Resolution:** The gap around the pump suction line in the top of the hypochlorite solution container was eliminated by placing the line in a new container cap per letter and completed work order faxed on 04/28/2008.

---

**Track No:** 336734**30 TAC Chapter 291.93(3)****Alleged Violation:**

Investigation: 650597

Comment Date: 06/10/2008

**Adequacy of Water Utility Service**

Failure, by a retail public utility that possesses a certificate of public convenience and necessity that has reached 85% of its capacity as compared to the most restrictive criteria of the commission's minimum capacity requirements in Chapter 290 T.A.C., to submit to the executive director a planning report that clearly explains how the retail public utility will provide the expected service demands to the remaining areas within the boundaries of its certificated area.

Description: At the time of the investigation the system had 39 active connections and a total pressure tank capacity of 2050 gallons. The system must submit to the TCEQ a planning report because it has reached 95 percent of its pressure tank capacity. This is calculated as follows: Pressure tank capacity required = 50 gal/conn x 39 conn = 1950 gallons  
required cap/provided cap x 100% = 1950 gal/2050 gal x 100% = 95%

**Recommended Corrective Action:** Submit a planning report within 90 days.

**Resolution:** On 04/28/2008, the Region 12 office received a fax stating that no further growth in the subdivision was anticipated.

# ORBIT SYSTEMS, INC.

Orbit Systems, Inc.  
1302 Airline North  
Rosharon TX 77583

April 28, 2008

Mr. Clifford Sheffield  
TCEQ  
Region 12  
5425 Polk Avenue, Suite H  
Houston, Texas 77023-1486

Dear Mr. Sheffield:

**Subject: Public Water Supply; Country Meadows; ID #0200273; Brazoria County, Texas**

On April 15, 2008, a sanitary survey was conducted at the subject water system. The following actions were taken as a result of the items of noncompliance:

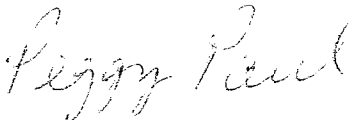
1. **2" well produces 48 gpm.** Wells #1 and #2 have been connected with chlorination facilities to provide 96 gallons per minute (48 gpm each well) to the subdivision. Please see attached copy of work order.
2. **Estimated up to ¼" gap around pump suction line in top of hypochlorite solution container.** Hypochlorite solution container caps have been replaced to provide seal on pump suction line. Please see attached copy of work order.

Number of active connections: 39

**Water system has exceeded 85% of its pressure tank capacity.** Subdivision has 39 active connections with 2050 gallons pressure tank capacity. This provides 52.6 gallons per connection, which exceeds the 85% capacity rule. However, no further growth of the subdivision is expected. See attached letter which has been sent to the executive director requesting waiver of the 85% capacity requirement.

If you have any questions or require further information regarding these actions, please contact me at the above address or telephone 281-369-2041.

Sincerely,



Peggy Paul  
Orbit Systems, Inc.

**ORBIT SYTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TX 77583  
(281) 369-2041**

April 28, 2008

TCEQ Executive Director  
Public Drinking Water Section - MC 155  
Water Permits & Resource Management Division  
PO Box 13087  
Austin, TX 78711-3087

Subject: Request for Waiver of Reporting Requirements for Expected Service Demands  
Country Meadows Estates Subdivision, PWS ID No.0200273; Brazoria County TX

Dear Sir or Madam:

This is to request a waiver of reporting requirements for expected service demands at Country Meadows Estates Subdivision. The water system has exceeded 85% of pressure tank capacity. Subdivision has 39 active connections with 2050 gallons pressure tank capacity. This provides 52.6 gallons per connection, which exceeds the 85% capacity rule. However, no further growth is anticipated for the water system.

If you have any questions or require further information, please contact me at the above address or telephone number.

Sincerely,

A handwritten signature in cursive script that reads "Peggy Paul".

Peggy Paul  
Orbit Systems, Inc.

buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

July 15, 2008

Ms. Jane Brem, President  
Orbit Systems, Inc.  
1302 Airline North  
Rosharon, Texas 77583-7718

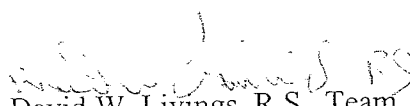
Re: Comprehensive Compliance Investigation at:  
Blue Sage Gardens Subdivision, 5100 Blue Sage Drive, Pearland, Brazoria County, Texas  
TCEQ ID No. 0200323

Dear Ms. Brem:

On June 12, 2008, Mrs. Amy Branom of the Texas Commission on Environmental Quality (TCEQ), Houston Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply systems. During the investigation, the investigator notified you of some apparent instances of noncompliance. You have provided us with information which appears to indicate that these problems have been corrected. However, please see the attached Summary of Investigation Findings for an additional issue. Please be aware that additional violations may be documented based upon further review of records or self-reporting.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mrs. Amy Branom in the Houston Region Office at (713)767-3650.

Sincerely,

  
David W. Livings, R.S., Team Leader  
Public Water Supply  
Houston Region Office

DWL/AJB/ra

cc: Brazoria County Environmental Health Department

Enclosures: Summary of Investigation Findings

## ADDITIONAL ISSUES

### Description

Other violations noted during the investigation?  
(If non-compliant then describe violation in the comment section.)

### Additional Comments

After any field inspection, a retail public utility must analyze the system's capacity to determine if it has reached 85% of its capacity. If the retail public utility has reached 85% of its capacity, it must file this report no later than 90 days after the date of a commission letter detailing the results of the inspection. Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage, or pumping. Specifically, it is noted that your system has reached 90% of its well production capacity.

This information was based on 36 connections and calculated as follows: The required well production capacity is 1.5 gallons per minute X 36 connections = 54 gallons per minute. At the time of the inspection, your well provided 60 gallons per minute. The required 54 gallons per minute production capacity divided by the provided 60 gallons per minute production capacity = 90 %.

# ORBIT SYSTEMS, INC.

Orbit Systems, Inc.  
1302 Airline North  
Rosharon TX 77583

August 18, 2008

Ms. Amy Branom  
TCEQ  
Region 12  
5425 Polk Avenue, Suite H  
Houston, Texas 77023-1486

Dear Ms. Branom:

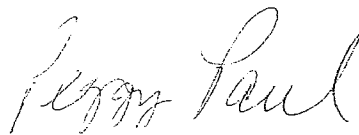
**Subject: Public Water Supply; Blue Sage Gardens; ID #0200323; Brazoria County, Texas**

On June 12, 2008, a sanitary survey was conducted at the subject water system. The following action was taken as a result of the item of noncompliance requiring further documentation:

1. **Your system is required to submit an 85% planning report to Central Office within 90 days.**  
A letter was written to request waiver of reporting requirements for expected service demands at this subdivision. Please see attached.

If you have any questions or require further information regarding these actions, please contact me at the above address or telephone 281-369-2041.

Sincerely,



Peggy Paul  
Orbit Systems, Inc



**ORBIT SYTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TX 77583  
(281) 369-2041**

August 18, 2008

TCEQ Executive Director  
Public Drinking Water Section - MC 155  
Water Permits & Resource Management Division  
PO Box 13087  
Austin, TX 78711-3087

Subject: Request for Waiver of Reporting Requirements for Expected Service Demands  
Blue Sage Subdivision, PWS ID No.0200323; Brazoria County TX

Dear Sir or Madam:

This is to request a waiver of reporting requirements for expected service demands at Colony Cove Subdivision. The water system has exceeded 85% of well production capacity. Subdivision has 36 active connections with 60 gallons per minute well production capacity. This provides 1.67 gallons per minute per connection, which exceeds the 85% capacity rule. However, no further growth is anticipated for the water system.

If you have any questions or require further information, please contact me at the above address or telephone number.

Sincerely,



Peggy Paul  
Orbit Systems, Inc.

Cc: Ms Amy Branom, TCEQ Region 12

Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Kathleen Hartnett White, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

April 1, 2002

Mr. Peggy Paul  
Orbit Systems, Inc.  
1302 Airline North  
Rosharon, Texas 77583

Subject: Request for Exception to the Rule Requiring 200 Gallons of Total Storage Capacity per Connection  
Demi-John Island Water System PWS I.D.# 0200234  
Brazoria County, Texas

Dear Ms. Paul:

We received your letter dated March 6, 2002, requesting an exception to our rule requiring 200 gallons of total storage capacity per connection. We also received daily usage logs from May of 1999 thru February of 2002. We note that the system consists of 98 active connections, has a total storage capacity of 15,000 gallons, a total pressure tank capacity of 10,000 gallon and your daily peak usage was 12,600 gallons.

We approve your request for an exception to the rule requiring 200 gallons of total storage capacity per connection. With this exception the value of 130 gallons per connection will be used to calculate your total storage capacity. All exceptions are subject to periodic review and may be revoked or amended if warranted. If you have any questions please call me at (512) 239-6063.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Napier".

Thomas S. Napier, P.E.  
Public Drinking Water Section ( MC 155)  
Water Supply Division

TSN/JLS:sr

cc: TNRCC, Houston Regional Office  
Joe Strouse, P.E., TNRCC, Rate Design/Plans Review  
Judson Smith, Tyler Regional Office

Orbit Systems, Inc.  
1302 Airline North  
Rosharon, Texas 77583

March 6, 2002

Mr. Thomas S. Napier, P.E.  
TNRCC  
Public Drinking Water Section - MC 155  
Water Permits & Resource Management Division  
P.O. Box 13087  
Austin, TX 78711-3087

Dear Mr. Napier:

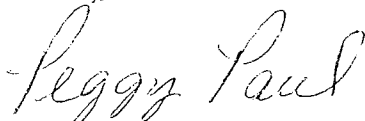
Subject: Request for an Exception to Minimum Storage Capacity Requirement  
Demi-John Island Water System - I.D. #0200234  
Brazoria County, Texas

Attached is the information you requested in your letter dated October 3, 2001 to enable evaluation of Orbit Systems, Inc's request for an exception to the rule requiring 200 gallons of storage capacity per connection at Demi-John Island Water System PWS ID #0200234 (TNRCC Chapter 290.45 (b)(1)(C)(ii)). An exception to this rule is requested for the following reasons:

1. The storage tank capacity at this subdivision is 15,000 gallons or 153 gallons per connection based on 98 connections. This subdivision also has a large pressure tank capacity of 10,000 gallons or 102 gallons per connection. This is five times the required pressure tank capacity of 20 gallons per connection according to TNRCC Chapter 290.45 (b)(1)(C)(iv). Total combined pressure and storage tank capacity is 25,000 gallons or 255 gallons per connection. If you subtract the required pressure tank capacity of 20 gallons per connection, which TNRCC Chapter 290.45 (a) excludes from total storage capacity, the additional capacity is 236 gallons per connection. This exceeds the minimum storage capacity requirement of 200 gallons per connection.
2. This subdivision is a fishing camp consisting primarily of vacation/retirement homes. Average daily water usage is 10,250 gallons per day or 105 gallons per connection per day. With the current storage and pressure tank capacity combination, water is stored in the tanks an average of 2.5 days. This detention time has the potential to cause taste and odor problems, and the subdivision requires a high chlorine residual at the well to maintain a minimum residual of 0.2 mg/l in the far reaches of the subdivision. Additional storage capacity would further increase the detention time and add to the problem of maintaining chlorine residual within the distribution system.
3. The attached table, Demi-John Island Daily Water Usage, shows records documenting the daily production of the water system since June 1999 when a new master meter was installed on the primary well. I can provide you with data through June 2002 as it becomes available if necessary as you requested data for 3 years. Maximum usage during June 1999 to present was 12,983 gallons daily production and minimum usage during this time period was 6060 gallons daily production.

We look forward to working with you on this exemption request. If you have any questions or require further information, please contact me at the above address or telephone (281) 369-2041.

Sincerely,



Peggy Paul  
Orbit Systems, Inc.

Demi-John Island  
Daily Water Usage  
(Based on Master Meter Readings from Well #1 and Well #2)

| DATE     | DAYS | MASTER METER RDG #1 | DAILY USG #1 | MASTER METER RDG #2 | DAILY USG #2 | TOTAL DAILY USG |
|----------|------|---------------------|--------------|---------------------|--------------|-----------------|
| 06/17/99 |      | 0                   |              | 957100              |              |                 |
| 06/18/99 | 1    | 10030               | 10030        | 957100              | 0            | 10030           |
| 06/21/99 | 3    | 40230               | 10067        | 957100              | 0            | 10067           |
| 06/22/99 | 1    | 51470               | 11240        | 957100              | 0            | 11240           |
| 06/25/99 | 3    | 51470               | 0            | 987400              | 10100        | 10100           |
| 06/30/99 | 5    | 115920              | 12890        | 987400              | 0            | 12890           |
| 07/05/99 | 5    | 176100              | 12036        | 987400              | 0            | 12036           |
| 07/09/99 | 4    | 227400              | 12825        | 987400              | 0            | 12825           |
| 07/14/99 | 5    | 291900              | 12900        | 987400              | 0            | 12900           |
| 07/19/99 | 5    | 354200              | 12460        | 987400              | 0            | 12460           |
| 07/22/99 | 3    | 389000              | 11600        | 987400              | 0            | 11600           |
| 07/27/99 | 5    | 451600              | 12520        | 987400              | 0            | 12520           |
| 08/02/99 | 6    | 517700              | 11017        | 987400              | 0            | 11017           |
| 08/03/99 | 1    | 528300              | 10600        | 987400              | 0            | 10600           |
| 08/11/99 | 8    | 623300              | 11875        | 987400              | 0            | 11875           |
| 08/13/99 | 2    | 646600              | 11650        | 987400              | 0            | 11650           |
| 08/17/99 | 4    | 692600              | 11500        | 987400              | 0            | 11500           |
| 08/20/99 | 3    | 729200              | 12200        | 987400              | 0            | 12200           |
| 08/21/99 | 1    | 741200              | 12000        | 987400              | 0            | 12000           |
| 08/23/99 | 2    | 766400              | 12600        | 987400              | 0            | 12600           |
| 08/31/99 | 8    | 861200              | 11850        | 987400              | 0            | 11850           |
| 09/03/99 | 3    | 898600              | 12467        | 987400              | 0            | 12467           |
| 09/07/99 | 4    | 950200              | 12900        | 987400              | 0            | 12900           |
| 09/10/99 | 3    | 950200              | 0            | 1025800             | 12800        | 12800           |
| 09/14/99 | 4    | 1002000             | 12950        | 1025800             | 0            | 12950           |
| 09/17/99 | 3    | 1039300             | 12433        | 1025800             | 0            | 12433           |
| 09/22/99 | 5    | 1100400             | 12220        | 1025800             | 0            | 12220           |
| 09/27/99 | 5    | 1159000             | 11720        | 1025800             | 0            | 11720           |
| 09/30/99 | 3    | 1195300             | 12100        | 1025800             | 0            | 12100           |
| 10/05/99 | 5    | 1249200             | 10780        | 1025800             | 0            | 10780           |
| 10/11/99 | 6    | 1296900             | 7950         | 1025800             | 0            | 7950            |
| 10/14/99 | 3    | 1320500             | 7867         | 1025800             | 0            | 7867            |
| 10/15/99 | 1    | 1320500             | 0            | 1036500             | 10700        | 10700           |
| 10/21/99 | 6    | 1371000             | 8417         | 1036500             | 0            | 8417            |
| 10/27/99 | 6    | 1417200             | 7700         | 1036500             | 0            | 7700            |
| 10/28/99 | 1    | 1417200             | 0            | 1045200             | 8700         | 8700            |
| 11/05/99 | 7    | 1506700             | 12786        | 1045200             | 0            | 12786           |
| 11/09/99 | 4    | 1553200             | 11625        | 1045200             | 0            | 11625           |
| 11/12/99 | 3    | 1579500             | 8767         | 1045200             | 0            | 8767            |
| 11/18/99 | 6    | 1635800             | 9383         | 1045200             | 0            | 9383            |
| 11/23/99 | 5    | 1681800             | 9200         | 1045200             | 0            | 9200            |
| 11/29/99 | 6    | 1733000             | 8533         | 1045200             | 0            | 8533            |
| 12/02/99 | 3    | 1758700             | 8567         | 1045200             | 0            | 8567            |
| 12/08/99 | 6    | 1808700             | 8333         | 1045200             | 0            | 8333            |
| 12/13/99 | 5    | 1845500             | 7360         | 1045200             | 0            | 7360            |
| 12/21/99 | 8    | 1906100             | 7575         | 1045200             | 0            | 7575            |
| 12/27/99 | 6    | 1954500             | 8067         | 1045200             | 0            | 8067            |
| 12/30/99 | 3    | 1980200             | 8567         | 1045200             | 0            | 8567            |
| 01/04/00 | 5    | 2021500             | 8260         | 1045200             | 0            | 8260            |
| 01/07/00 | 3    | 2046600             | 8367         | 1045200             | 0            | 8367            |
| 01/11/00 | 4    | 2081300             | 8675         | 1045200             | 0            | 8675            |
| 01/19/00 | 8    | 2158400             | 9638         | 1045200             | 0            | 9638            |
| 01/24/00 | 5    | 2207700             | 9860         | 1045200             | 0            | 9860            |
| 01/28/00 | 4    | 2251600             | 10975        | 1045200             | 0            | 10975           |
| 02/07/00 | 10   | 2371500             | 11990        | 1045200             | 0            | 11990           |
| 02/09/00 | 2    | 2394900             | 11700        | 1045200             | 0            | 11700           |
| 02/14/00 | 5    | 2455200             | 12060        | 1045200             | 0            | 12060           |
| 02/15/00 | 1    | 2466800             | 11600        | 1045200             | 0            | 11600           |
| 02/22/00 | 7    | 2550000             | 11886        | 1045200             | 0            | 11886           |
| 02/25/00 | 3    | 2584300             | 11433        | 1045200             | 0            | 11433           |

Demi-John Island  
Daily Water Usage

(Based on Master Meter Readings from Well #1 and Well #2)

| DATE     | DAYS | MASTER METER RDG #1 | DAILY USG #1 | MASTER METER RDG #2 | DAILY USG #2 | TOTAL DAILY USG |
|----------|------|---------------------|--------------|---------------------|--------------|-----------------|
| 02/28/00 | 3    | 2617900             | 11200        | 1045200             | 0            | 11200           |
| 03/01/00 | 1    | 2629100             | 11200        | 1045200             | 0            | 11200           |
| 03/07/00 | 6    | 2701300             | 12033        | 1045200             | 0            | 12033           |
| 03/10/00 | 3    | 2732400             | 10367        | 1045200             | 0            | 10367           |
| 03/15/00 | 5    | 2783600             | 10240        | 1045200             | 0            | 10240           |
| 03/17/00 | 2    | 2803300             | 9850         | 1045200             | 0            | 9850            |
| 03/21/00 | 4    | 2844800             | 10375        | 1045200             | 0            | 10375           |
| 03/24/00 | 3    | 2871700             | 8967         | 1045200             | 0            | 8967            |
| 03/28/00 | 4    | 2915200             | 10875        | 1045200             | 0            | 10875           |
| 04/03/00 | 6    | 2978700             | 10583        | 1045200             | 0            | 10583           |
| 04/06/00 | 3    | 3008600             | 9967         | 1045200             | 0            | 9967            |
| 04/13/00 | 7    | 3080400             | 10257        | 1045200             | 0            | 10257           |
| 04/14/00 | 1    | 3089100             | 8700         | 1045200             | 0            | 8700            |
| 04/18/00 | 4    | 3131400             | 10575        | 1045200             | 0            | 10575           |
| 04/24/00 | 6    | 3196700             | 10883        | 1045200             | 0            | 10883           |
| 04/28/00 | 4    | 3239700             | 10750        | 1045200             | 0            | 10750           |
| 05/01/00 | 3    | 3271000             | 10433        | 1045200             | 0            | 10433           |
| 05/05/00 | 4    | 3317100             | 11525        | 1045200             | 0            | 11525           |
| 05/10/00 | 5    | 3370200             | 10620        | 1045200             | 0            | 10620           |
| 05/11/00 | 1    | 3380500             | 10300        | 1045200             | 0            | 10300           |
| 05/15/00 | 4    | 3423400             | 10725        | 1045200             | 0            | 10725           |
| 05/18/00 | 3    | 3462000             | 12867        | 1045200             | 0            | 12867           |
| 05/22/00 | 4    | 3513200             | 12800        | 1045200             | 0            | 12800           |
| 05/25/00 | 3    | 3547000             | 11267        | 1045200             | 0            | 11267           |
| 05/26/00 | 1    | 3558900             | 11900        | 1045200             | 0            | 11900           |
| 05/30/00 | 4    | 3609000             | 12525        | 1045200             | 0            | 12525           |
| 06/05/00 | 6    | 3679400             | 11733        | 1045200             | 0            | 11733           |
| 06/12/00 | 7    | 3763200             | 11971        | 1045200             | 0            | 11971           |
| 06/16/00 | 5    | 3825900             | 12540        | 1045200             | 0            | 12540           |
| 06/19/00 | 3    | 3863800             | 12633        | 1045200             | 0            | 12633           |
| 06/23/00 | 4    | 3911200             | 11850        | 1045200             | 0            | 11850           |
| 06/27/00 | 4    | 3960500             | 12325        | 1045200             | 0            | 12325           |
| 06/28/00 | 1    | 3972100             | 11600        | 1045200             | 0            | 11600           |
| 07/03/00 | 5    | 4036500             | 12880        | 1045200             | 0            | 12880           |
| 07/06/00 | 3    | 4074400             | 12633        | 1045200             | 0            | 12633           |
| 07/07/00 | 1    | 4087000             | 12600        | 1045200             | 0            | 12600           |
| 07/11/00 | 4    | 4132000             | 11250        | 1045200             | 0            | 11250           |
| 07/18/00 | 7    | 4210500             | 11214        | 1045200             | 0            | 11214           |
| 07/19/00 | 1    | 4221600             | 11100        | 1045200             | 0            | 11100           |
| 07/24/00 | 5    | 4285400             | 12760        | 1045200             | 0            | 12760           |
| 07/27/00 | 3    | 4323100             | 12567        | 1045200             | 0            | 12567           |
| 08/01/00 | 5    | 4384900             | 12360        | 1045200             | 0            | 12360           |
| 08/04/00 | 3    | 4419600             | 11567        | 1045200             | 0            | 11567           |
| 08/08/00 | 4    | 4468600             | 12250        | 1045200             | 0            | 12250           |
| 08/14/00 | 6    | 4541900             | 12217        | 1045200             | 0            | 12217           |
| 08/15/00 | 1    | 4553100             | 11200        | 1045200             | 0            | 11200           |
| 08/18/00 | 3    | 4586300             | 11067        | 1045200             | 0            | 11067           |
| 08/25/00 | 7    | 4673300             | 12429        | 1045200             | 0            | 12429           |
| 08/30/00 | 5    | 4729400             | 11220        | 1045200             | 0            | 11220           |
| 09/01/00 | 2    | 4748300             | 9450         | 1045200             | 0            | 9450            |
| 09/05/00 | 4    | 4795800             | 11875        | 1045200             | 0            | 11875           |
| 09/06/00 | 1    | 4805700             | 9900         | 1045200             | 0            | 9900            |
| 09/12/00 | 6    | 4868600             | 10483        | 1045200             | 0            | 10483           |
| 09/13/00 | 1    | 4876400             | 7800         | 1045200             | 0            | 7800            |
| 09/15/00 | 2    | 4897500             | 10550        | 1045200             | 0            | 10550           |
| 09/18/00 | 3    | 4921800             | 8100         | 1045200             | 0            | 8100            |
| 09/20/00 | 2    | 4939700             | 8950         | 1045200             | 0            | 8950            |
| 09/22/00 | 2    | 4956800             | 8550         | 1045200             | 0            | 8550            |
| 09/27/00 | 5    | 4994400             | 7520         | 1045200             | 0            | 7520            |
| 10/02/00 | 5    | 5035700             | 8260         | 1045200             | 0            | 8260            |

Demi-John Island  
Daily Water Usage

(Based on Master Meter Readings from Well #1 and Well #2)

| DATE     | DAYS | MASTER METER RDG #1 | DAILY USG #1 | MASTER METER RDG #2 | DAILY USG #2 | TOTAL DAILY USG |
|----------|------|---------------------|--------------|---------------------|--------------|-----------------|
| 10/06/00 | 4    | 5068700             | 8250         | 1045200             | 0            | 8250            |
| 10/10/00 | 4    | 5099300             | 7650         | 1045200             | 0            | 7650            |
| 10/13/00 | 3    | 5125800             | 8833         | 1045200             | 0            | 8833            |
| 10/16/00 | 3    | 5152300             | 8833         | 1045200             | 0            | 8833            |
| 10/23/00 | 7    | 5212200             | 8557         | 1045200             | 0            | 8557            |
| 10/25/00 | 2    | 5229900             | 8850         | 1045200             | 0            | 8850            |
| 10/31/00 | 6    | 5282100             | 8700         | 1045200             | 0            | 8700            |
| 11/03/00 | 3    | 5309000             | 8967         | 1045200             | 0            | 8967            |
| 11/06/00 | 3    | 5309000             | 0            | 1080700             | 11833        | 11833           |
| 11/08/00 | 2    | 5309000             | 0            | 1105800             | 12550        | 12550           |
| 11/10/00 | 2    | 5309000             | 0            | 1124700             | 9450         | 9450            |
| 11/13/00 | 3    | 5345600             | 12200        | 1124700             | 0            | 12200           |
| 11/17/00 | 4    | 5357500             | 12125        | 1124700             | 0            | 12125           |
| 11/21/00 | 4    | 5392400             | 11700        | 1124700             | 0            | 11700           |
| 11/27/00 | 6    | 5459700             | 11217        | 1124700             | 0            | 11217           |
| 12/01/00 | 4    | 5502900             | 10800        | 1124700             | 0            | 10800           |
| 12/05/00 | 4    | 5553000             | 12525        | 1124700             | 0            | 12525           |
| 12/08/00 | 3    | 5591700             | 12900        | 1124700             | 0            | 12900           |
| 12/15/00 | 7    | 5668000             | 10900        | 1124700             | 0            | 10900           |
| 12/19/00 | 4    | 5718700             | 12675        | 1124700             | 0            | 12675           |
| 12/20/00 | 1    | 5729500             | 10800        | 1124700             | 0            | 10800           |
| 12/27/00 | 7    | 5818700             | 12743        | 1124700             | 0            | 12743           |
| 12/29/00 | 2    | 5837800             | 9550         | 1124700             | 0            | 9550            |
| 01/04/01 | 6    | 5896400             | 9767         | 1124700             | 0            | 9767            |
| 01/10/01 | 6    | 5956500             | 10017        | 1124700             | 0            | 10017           |
| 01/15/01 | 5    | 6002300             | 9160         | 1124700             | 0            | 9160            |
| 01/17/01 | 2    | 6019400             | 8550         | 1124700             | 0            | 8550            |
| 01/20/01 | 3    | 6047500             | 9367         | 1124700             | 0            | 9367            |
| 01/25/01 | 5    | 6088100             | 8120         | 1124700             | 0            | 8120            |
| 01/29/01 | 4    | 6130200             | 10525        | 1124700             | 0            | 10525           |
| 02/01/01 | 3    | 6153100             | 7633         | 1124700             | 0            | 7633            |
| 02/05/01 | 4    | 6191600             | 9625         | 1124700             | 0            | 9625            |
| 02/06/01 | 1    | 6200600             | 9000         | 1124700             | 0            | 9000            |
| 02/12/01 | 6    | 6261000             | 10067        | 1124700             | 0            | 10067           |
| 02/13/01 | 1    | 6268700             | 7700         | 1124700             | 0            | 7700            |
| 02/19/01 | 6    | 6324400             | 9283         | 1124700             | 0            | 9283            |
| 02/20/01 | 1    | 6333000             | 8600         | 1124700             | 0            | 8600            |
| 02/26/01 | 6    | 6390500             | 9583         | 1124700             | 0            | 9583            |
| 02/28/01 | 2    | 6409900             | 9700         | 1124700             | 0            | 9700            |
| 03/05/01 | 5    | 6447800             | 7580         | 1124700             | 0            | 7580            |
| 03/12/01 | 7    | 6504900             | 8157         | 1124700             | 0            | 8157            |
| 03/14/01 | 2    | 6521600             | 8350         | 1124700             | 0            | 8350            |
| 03/19/01 | 5    | 6564800             | 8640         | 1124700             | 0            | 8640            |
| 03/22/01 | 3    | 6598600             | 11267        | 1124700             | 0            | 11267           |
| 03/28/01 | 6    | 6652700             | 9017         | 1124700             | 0            | 9017            |
| 04/02/01 | 5    | 6707000             | 10860        | 1124700             | 0            | 10860           |
| 04/03/01 | 1    | 6715600             | 8600         | 1124700             | 0            | 8600            |
| 04/09/01 | 6    | 6767400             | 8633         | 1124700             | 0            | 8633            |
| 04/12/01 | 3    | 6795800             | 9467         | 1124700             | 0            | 9467            |
| 04/17/01 | 5    | 6837100             | 8260         | 1124700             | 0            | 8260            |
| 04/23/01 | 6    | 6894800             | 9617         | 1124700             | 0            | 9617            |
| 04/24/01 | 1    | 6903100             | 8300         | 1124700             | 0            | 8300            |
| 04/30/01 | 6    | 6958100             | 9167         | 1124700             | 0            | 9167            |
| 05/03/01 | 3    | 6990700             | 10867        | 1124700             | 0            | 10867           |
| 05/08/01 | 5    | 7049800             | 11820        | 1124700             | 0            | 11820           |
| 05/11/01 | 3    | 7081100             | 10433        | 1124700             | 0            | 10433           |
| 05/17/01 | 6    | 7147500             | 11067        | 1124700             | 0            | 11067           |
| 05/21/01 | 4    | 7193300             | 11450        | 1124700             | 0            | 11450           |
| 05/24/01 | 3    | 7231800             | 12833        | 1124700             | 0            | 12833           |
| 05/25/01 | 1    | 7243800             | 12000        | 1124700             | 0            | 12000           |

Demi-John Island  
Daily Water Usage

(Based on Master Meter Readings from Well #1 and Well #2)

| DATE     | DAYS | MASTER METER RDG #1 | DAILY USG #1 | MASTER METER RDG #2 | DAILY USG #2 | TOTAL DAILY USG |
|----------|------|---------------------|--------------|---------------------|--------------|-----------------|
| 05/29/01 | 4    | 7295100             | 12825        | 1124700             | 0            | 12825           |
| 06/04/01 | 6    | 7373000             | 12983        | 1124700             | 0            | 12983           |
| 06/06/01 | 2    | 7396800             | 11900        | 1124700             | 0            | 11900           |
| 06/11/01 | 5    | 7460900             | 12820        | 1124700             | 0            | 12820           |
| 06/15/01 | 4    | 7509300             | 12100        | 1124700             | 0            | 12100           |
| 06/20/01 | 5    | 7572200             | 12580        | 1124700             | 0            | 12580           |
| 06/22/01 | 2    | 7597800             | 12800        | 1124700             | 0            | 12800           |
| 06/27/01 | 5    | 7656800             | 11800        | 1124700             | 0            | 11800           |
| 07/02/01 | 5    | 7720300             | 12700        | 1124700             | 0            | 12700           |
| 07/06/01 | 4    | 7772000             | 12925        | 1124700             | 0            | 12925           |
| 07/10/01 | 4    | 7823300             | 12825        | 1124700             | 0            | 12825           |
| 07/16/01 | 6    | 7896500             | 12200        | 1124700             | 0            | 12200           |
| 07/20/01 | 4    | 7939000             | 10625        | 1124700             | 0            | 10625           |
| 07/24/01 | 4    | 7985200             | 11550        | 1124700             | 0            | 11550           |
| 07/25/01 | 1    | 7996000             | 10800        | 1124700             | 0            | 10800           |
| 07/30/01 | 5    | 8044400             | 9680         | 1124700             | 0            | 9680            |
| 08/03/01 | 4    | 8081300             | 9225         | 1124700             | 0            | 9225            |
| 08/06/01 | 3    | 8117000             | 11900        | 1124700             | 0            | 11900           |
| 08/07/01 | 1    | 8126600             | 9600         | 1124700             | 0            | 9600            |
| 08/10/01 | 3    | 8154200             | 9200         | 1124700             | 0            | 9200            |
| 08/14/01 | 4    | 8195900             | 10425        | 1124700             | 0            | 10425           |
| 08/20/01 | 6    | 8247000             | 8517         | 1124700             | 0            | 8517            |
| 08/23/01 | 3    | 8276700             | 9900         | 1124700             | 0            | 9900            |
| 08/27/01 | 4    | 8323000             | 11575        | 1124700             | 0            | 11575           |
| 08/31/01 | 4    | 8371800             | 12200        | 1124700             | 0            | 12200           |
| 09/05/01 | 5    | 8432800             | 12200        | 1124700             | 0            | 12200           |
| 09/07/01 | 2    | 8452500             | 9850         | 1124700             | 0            | 9850            |
| 09/13/01 | 6    | 8513700             | 10200        | 1124700             | 0            | 10200           |
| 09/17/01 | 4    | 8547200             | 8375         | 1124700             | 0            | 8375            |
| 09/20/01 | 3    | 8582700             | 11833        | 1124700             | 0            | 11833           |
| 09/24/01 | 4    | 8624800             | 10525        | 1124700             | 0            | 10525           |
| 09/28/01 | 4    | 8658200             | 8350         | 1124700             | 0            | 8350            |
| 10/01/01 | 3    | 8685200             | 9000         | 1124700             | 0            | 9000            |
| 10/02/01 | 1    | 8694300             | 9100         | 1124700             | 0            | 9100            |
| 10/08/01 | 6    | 8740900             | 7767         | 1124700             | 0            | 7767            |
| 10/12/01 | 4    | 8777300             | 9100         | 1124700             | 0            | 9100            |
| 10/16/01 | 4    | 8810200             | 8225         | 1124700             | 0            | 8225            |
| 10/19/01 | 3    | 8842200             | 10667        | 1124700             | 0            | 10667           |
| 10/23/01 | 4    | 8871600             | 7350         | 1124700             | 0            | 7350            |
| 10/26/01 | 3    | 8897500             | 8633         | 1124700             | 0            | 8633            |
| 11/02/01 | 7    | 8948200             | 7243         | 1124700             | 0            | 7243            |
| 11/05/01 | 3    | 8974100             | 8633         | 1124700             | 0            | 8633            |
| 11/09/01 | 4    | 9013300             | 9800         | 1124700             | 0            | 9800            |
| 11/12/01 | 3    | 9038100             | 8267         | 1124700             | 0            | 8267            |
| 11/13/01 | 1    | 9046000             | 7900         | 1124700             | 0            | 7900            |
| 11/20/01 | 7    | 9093500             | 6786         | 1124700             | 0            | 6786            |
| 11/26/01 | 6    | 9151000             | 9583         | 1124700             | 0            | 9583            |
| 12/03/01 | 7    | 9208000             | 8143         | 1124700             | 0            | 8143            |
| 12/06/01 | 3    | 9228200             | 6733         | 1124700             | 0            | 6733            |
| 12/11/01 | 5    | 9265100             | 7380         | 1124700             | 0            | 7380            |
| 12/14/01 | 3    | 9284300             | 6400         | 1124700             | 0            | 6400            |
| 12/20/01 | 6    | 9328500             | 7367         | 1124700             | 0            | 7367            |
| 12/21/01 | 1    | 9334700             | 6200         | 1124700             | 0            | 6200            |
| 12/28/01 | 7    | 9380500             | 6543         | 1124700             | 0            | 6543            |
| 01/03/02 | 6    | 9422900             | 7067         | 1124700             | 0            | 7067            |
| 01/07/02 | 4    | 9448200             | 6325         | 1124700             | 0            | 6325            |
| 01/10/02 | 3    | 9471100             | 7633         | 1124700             | 0            | 7633            |
| 01/11/02 | 1    | 9475100             | 4000         | 1127700             | 3000         | 7000            |
| 01/16/02 | 5    | 9515500             | 8880         | 1127700             | 0            | 8880            |
| 01/21/02 | 5    | 9545800             | 6060         | 1127700             | 0            | 6060            |

Demi-John Island  
Daily Water Usage

(Based on Master Meter Readings from Well #1 and Well #2)

| DATE                         | DAYS | MASTER METER RDG #1 | DAILY USG #1 | MASTER METER RDG #2 | DAILY USG #2 | TOTAL DAILY USG |
|------------------------------|------|---------------------|--------------|---------------------|--------------|-----------------|
| 01/24/01                     | 3    | 9573200             | 9133         | 1127700             | 0            | 9133            |
| 01/28/01                     | 4    | 9615700             | 10625        | 1127700             | 0            | 10625           |
| 02/04/01                     | 7    | 9669200             | 7643         | 1127700             | 0            | 7643            |
| 02/07/02                     | 3    | 9691100             | 7300         | 1127700             | 0            | 7300            |
| 02/12/02                     | 5    | 9723200             | 6420         | 1127700             | 0            | 6420            |
| 02/13/02                     | 1    | 9731600             | 8400         | 1127700             | 0            | 8400            |
| 02/15/02                     | 2    | 9749100             | 8750         | 1127700             | 0            | 8750            |
| 02/20/02                     | 5    | 9805200             | 11220        | 1127700             | 0            | 11220           |
| AVG DAILY USAGE 6/99 TO 2/02 |      |                     |              |                     |              | 10251           |
| MAX USAGE 6/99 TO 2/02       |      |                     |              |                     |              | 12983           |
| MIN USAGE 6/99 TO 2/02       |      |                     |              |                     |              | 6060            |



Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

August 23, 2001

**CERTIFIED MAIL# 7000 2870 0000 2166 3998**  
**RETURN RECEIPT REQUESTED**

Ms. Jane Brem, Owner  
Orbit Systems Inc.  
1302 Airline North  
Rosharon, Texas 77583- 7718

47  
Re: Notice of Violation for the Compliance Evaluation Investigation at:  
Televue Terrace Subdivision, 211 Broadmore St., Fresno, County, Texas  
TNRCC ID No. 0790013

Dear Ms. Brem:

On July 31, 2001, Ms. Elaine Jackson of the Texas Natural Resource Conservation Commission (TNRCC) Houston Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply systems. During the investigation, certain outstanding alleged violation were identified for which compliance documentation is required. Enclosed is a summary which list the investigation finding. Please submit to this office by November 23, 2001 a written description of corrective action to be taken for violation number. A due date for submitting compliance documentation will be determined after you provide a compliance plan for this alleged violation.

The Texas Natural Resource Conservation Commission appreciates your assistance in this matter. Please note that the Legislature has granted TNRCC enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you or members of your staff have any questions, please feel free to contact Ms. Elaine Jackson in the Houston Region Office at 713/767-3650.

Sincerely,



Huyen D. Luu, P.E.  
PWS Team Leader  
Houston Region Office

HDL/ej

cc Ft Bend Co. Health Dept.

Enclosures Summary of Investigation Findings

REPLY TO REGION 12 • 5425 POLK AVENUE, STE H • HOUSTON, TEXAS 77023-1486 • 713/767-3500

P O Box 13087 • Austin Texas 78711-3087 • 512/239-1000 • Internet address www.tnrcc.state.tx.us

## SUMMARY OF INVESTIGATION FINDINGS

|   |                   |                             |
|---|-------------------|-----------------------------|
| Regulated Entity Name: Teleview Terrace Subdivision | TNRCC ID: 0790013 | Investigation Date: 7-31-01 |
|---|-------------------|-----------------------------|

### OUTSTANDING ALLEGED VIOLATIONS

| No. | Requirement(s) Cited             | Description of Alleged Violation,<br>Corrective Action Recommendation, and Compliance Documentation   | Compliance Due Date |
|-----|----------------------------------|---|---------------------|
| 1   | 30 TEX. ADMIN. CODE<br>§291.93.3 | <p><u>Adequacy of Water Utility Service</u></p> <p>A retail public utility that possesses a certificate of public convenience and necessity that has reached 85 % of its capacity as compared to the most restrictive criteria of the commission's minimum capacity requirements in Chapter 290 of this title shall submit to the executive director a planning report that clearly explains how the retail public utility will provide the expected service demands to the remaining areas within the boundaries of its certificated area.</p> <p>(A) After any commission field inspection, a retail public utility must analyze the system's capacity to determine if it has reached 85% of its capacity. If the retail public utility has reached 85% of its capacity, it must file this report no later than 90 days after the date of a commission letter detailing the results of the inspection. Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage, or pressure tank capacity. In this regard, your pressure tank capacity has reached 87 % capacity.</p> <p>(B) The report should be submitted in writing and should contain the following</p> <ul style="list-style-type: none"> <li>(i) a brief description of the overall utility system and service area;</li> <li>(ii) an analysis of the plant capacity as defined in subparagraph (A) of this paragraph,</li> <li>(iii) details on how the retail public utility will provide service to the remaining areas within the boundaries of its certificated area. This includes projections of cost and expected design and installation dates for additional facilities.</li> </ul> <p>(C) The executive director may waive or limit the reporting requirements if the retail public utility demonstrates that the projected growth of the area will not require the retail public utility to exceed 100% of its current capacity for the next five years</p> <p>(D) Any retail public utility required to file reports under this section of the rules, including those requesting waivers, shall file updated reports within 90 days after the retail public utility receives a copy of each subsequent commission field inspection report until the system demand is below 85% capacity</p> <p>Compliance Documentation: Submit copy of planning report to verify compliance</p> | 90 Days             |

**ORBIT SYTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TX 77583  
(281) 369-2041**

September 17, 2001

Mr. Thomas S. Napier, P.E.  
TNRCC  
Public Drinking Water Section - MC 155  
Water Permits & Resource Management Division  
PO Box 13087  
Austin, TX 78711-3087

Subject: Request for Waiver of Reporting Requirements for Expected Service Demands  
Teleview Terrace Subdivision, TNRCC ID No. 0790013  
Fort Bend County, Texas

Dear Mr. Napier:

This is to request a waiver of reporting requirements for expected service demands at Teleview Terrace Subdivision. The water system has reached 87% of pressure tank capacity with 44 connections. However, no further growth is anticipated for the water system as most of the remaining lots within the subdivision have private wells.

If you have any questions or require further information, please contact me at the above address or telephone number.

Sincerely,



Peggy Paul  
Orbit Systems, Inc.

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 3, 2008

Ms. Jane Brem, President  
Orbit Systems, Inc.  
1302 Airline N.  
Rosharon, TX 77583-7718

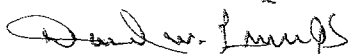
Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Wilco Water Co., 12602 Sandpiper Rd., Angleton, Brazoria, Texas  
RN101284453; TCEQ ID No.: 0200083; Investigation No.: 687088

Dear Ms. Brem:

On July 22, 2008, Ms. Eresha DeSilva of the Texas Commission on Environmental Quality (TCEQ), Houston Region Office, conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply systems. During the investigation, the investigator notified you of an apparent instance of noncompliance. You have provided us with information which appears to indicate that the problem has been corrected. No further response from you is necessary concerning this investigation. Please be aware that additional violations may be documented based upon further review of records or self-reporting.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions, please feel free to contact Ms. Eresha DeSilva in the Houston Region Office at 713/767-3650.

Sincerely,



David W. Livings, R.S., PWS Team Leader  
Houston Region Office

DWL/ED/ra

cc: Brazoria Co. Environmental Health Dept

Enclosures: Summary of Investigation Findings

**WILCO WATER CO**  
**1302 AIRLINE N**  
**ROSHARON, BRAZORIA COUNTY, TX 77583**

**Investigation # 687088**  
**Investigation Date: 07/22/2008**

**Additional ID(s): 0200083**

**ALLEGED VIOLATION(S) NOTED AND RESOLVED  
ASSOCIATED TO A NOTICE OF VIOLATION**

**Track No: 340849**

**30 TAC Chapter 291.93(3)**

**Alleged Violation:**

Investigation. 687088

Comment Date: 07/31/2008

**Adequacy of Water Utility Service**

Failure, by a retail public utility that possesses a certificate of public convenience and necessity that has reached 85% of its capacity as compared to the most restrictive criteria of the commission's minimum capacity requirements in Chapter 290 T.A.C., to submit to the executive director a planning report that clearly explains how the retail public utility will provide the expected service demands to the remaining areas within the boundaries of its certificated area. A report is not required if the source of supply available to the utility service provider is reduced to below the 85% level due to a court or agency conservation order unless that order is expected to extend for more than 18 months from the date it is entered in which case a report shall be required.

(A) After any commission field inspection, a retail public utility must analyze the system's capacity to determine if it has reached 85% of its capacity. If the retail public utility has reached 85% of its capacity, it must file this report no later than 90 days after the date of a commission letter detailing the results of the inspection. Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage, or pumping. Specifically, it is noted that the system has reached 94.9% of its well production capacity.

(B) The report should be submitted in writing and should contain the following:

- (i) a brief description of the overall utility system and service area;
- (ii) an analysis of the plant capacity as defined in subparagraph (A) of this paragraph;
- (iii) details on how the retail public utility will provide service to the remaining areas within the boundaries of its certificated area. This includes projections of cost and expected design and installation dates for additional facilities

(C) The executive director may waive or limit the reporting requirements if the retail public utility demonstrates that the projected growth of the area will not require the retail public utility to exceed 100% of its current capacity for the next five years.

(D) Any retail public utility required to file reports under this section of the rules, including those requesting waivers, shall file updated reports within 90 days after the retail public utility receives a copy of each subsequent commission field inspection report until the system demand is below 85% capacity.

In this connection, it was noted on this investigation that your production has reached 94.9% (= 64.5 GPM required / 68 MG provided x 100) of its capacity. The required capacity was based on 43 connections. The entity has an emergency well which may provide additional capacity, however, at the time of inspection the well was out of service.

**ORBIT SYTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TX 77583  
(281) 369-2041**

August 4, 2008

TCEQ Executive Director  
Public Drinking Water Section - MC 155  
Water Permits & Resource Management Division  
PO Box 13087  
Austin, TX 78711-3087

Subject: Request for Waiver of Reporting Requirements for Expected Service Demands  
Bastrop Holiday Beach (Wilco Water Co.), PWS ID No.0200083; Brazoria County TX

Dear Sir or Madam:

This is to request a waiver of reporting requirements for expected service demands at Bastrop Holiday Beach (Wilco Water Co.) Subdivision. The water system has exceeded 85% of well capacity. Subdivision has 43 active connections with 68 gallons per minute well capacity. This provides 1.58 gallons per minute per connection, which exceeds the 85% capacity rule. However, no further growth is anticipated for the water system.

If you have any questions or require further information, please contact me at the above address or telephone number.

Sincerely,



Peggy Paul  
Orbit Systems, Inc.

Cc: Ms. Eresha DeSilva, TCEQ Region 12

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*

PWS ID #0200083 CO

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 27, 2008

MS PEGGY PAUL  
ORBIT SYSTEMS INC  
1302 AIRLINE N  
ROSHARON TX 77583-7718

Re: Wilco Water Co - Public Water System I.D. #0200083  
85% Capacity Report--Bastrop Holiday Beach  
Contact Telephone: (281) 369-2041  
Plan Review Log Number 200808-072  
Brazoria County, Texas

CN600625198; RN101284453

Dear Ms. Paul:

The planning material received on August 12, 2008, with your letter dated August 4, 2008 for the proposed 85% capacity report has been reviewed. Please note that the last sentence of our rule, §291.93(3)(A), states the following:

*Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage or pumping.*

In other words, your report required under this rule, must not only evaluate the capacity according to well production, but, must also provide the capacity based on the most restrictive criteria of all other system equipment.

**Therefore, we cannot waive the reporting requirements until we receive an amended capacity report that complies with the above-stated rule.**

The Wilco Water Co public water supply system provides water treatment.

An appointed engineer must notify the TCEQ's Region 12 Office at (713) 767-3500 when construction will start.

Please refer to the Utilities Technical Review Team's Log No. 200808-072 in all correspondence for this project. This will help complete our review and prevent it from being considered a new project.

MS PEGGY PAUL

Page 2

August 27, 2008

Please complete a copy of the most current Public Water System Plan Review Submittal form for future submittal to TCEQ for review of improvements to a Public Water System. Every blank on the form must be completed to minimize any delays in review of your project. The document is available on our WEB site at the address shown below.

<http://www.tceq.state.tx.us/assets/public/permitting/forms/10233.pdf>

For future reference, you can review part of the Utilities Technical Review Team's database to see if we have received your project. This is available on the TCEQ's homepage on the Internet at the following address:

[http://www.tceq.state.tx.us/assets/public/permitting/watersupply/ud/planrev\\_list.pdf](http://www.tceq.state.tx.us/assets/public/permitting/watersupply/ud/planrev_list.pdf)

You can download checklists and the latest revision of Chapter 290 "Rules and Regulations for Public Water Systems" from this site:

[http://www.tceq.state.tx.us/permitting/water\\_supply/ud/planrev.html](http://www.tceq.state.tx.us/permitting/water_supply/ud/planrev.html)

If you have any questions please contact me at (512)239-6958 or the Internet address: "JSALGADO@tceq.state.tx.us" or if by correspondence, include MC 153 in the letterhead address below.

Sincerely,



Jerry Salgado, P.E.

Utilities Technical Review Team

Water Supply Division MC-153

Texas Commission on Environmental Quality

JAS/as



**ORBIT SYTEMS, INC.  
1302 AIRLINE NORTH  
ROSHARON, TX 77583  
(281) 369-2041**

October 2, 2008

Mr. Jerry Salgado, P. E.  
Texas Commission on Environmental Quality  
Utilities Technical Review Team  
Water Supply Division MC-153  
PO Box 13087  
Austin, TX 78711-3087

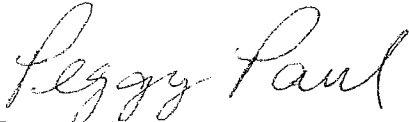
Subject: PLAN REVIEW LOG NUMBER 200808-072; CN600625198; RN101284453  
Request for Waiver of Reporting Requirements for Expected Service Demands  
Bastrop Holiday Beach (Wilco Water Co.), PWS ID No.0200083; Brazoria County TX

Dear Mr. Salgado:

This letter is in response to your request for a report containing capacity information for all system equipment. Please find the requested report attached.

If you have any questions or require further information, please contact me at the above address or telephone number.

Sincerely,



Peggy Paul  
Orbit Systems, Inc.

Wilco Water Co – Bastrop Holiday Beach  
Water Plant Capacity Report  
10-02-2008

Number of Connections: 43

290.45 Minimum Water System Capacity Requirements.

290.45(b) Community Water Systems.

290.45(b) (1) Ground water supply requirements

290.45(b) (1) (A) Fewer than 50 connections without ground storage

290.45(b) (1) (A) (i) Well Capacity – Well capacity is 68 gpm. This provides 1.58 gpm per connection which meets the minimum capacity requirement of 1.5 gpm per connection. This exceeds the 85% capacity rule; however no further growth is expected.

290.45(b) (1) (A) (ii) Pressure Tank Capacity – Pressure tank capacity is 2575 gallons. This provides 59.88 gallons per connection which meets the minimum capacity requirement of 50 gallons per connection. This also meets the 85% capacity rule.