

Control Number: 43586



Item Number: 35

Addendum StartPage: 0

B & D ENVIRONMENTAL, INC.

913 HYDE PARK DR.
ROUND ROCK, TEXAS 78665
PHONE NO. (512) 264-9124
FAX NO. (512) 692-1967

EMAIL: brettfenner@yahoo.com

March 7, 2016

Public Utility Commission
Central Records
1701 N. Congress P.O. Box 13326
Austin, Texas 78711-3326

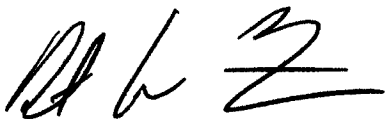
RECEIVED
2016 MAR 11 AM 9:31
PUBLIC UTILITY COMMISSION
FILING CLERK

Re: Docket No. 43586 - Application of Trinity SO PTN, LP. To Obtain Water and Sewer
Certificates of Convenience and Necessity (CCN) in Harris County

Enclosed please find documentation, going back to 2011, showing that any violations for
wastewater permit (WQ0012650001) have been addressed and notice of correction was submitted
and acknowledge by the Texas Commission on Environmental Quality.

Should you have any further questions concerning these responses, please do not hesitate to contact
me.

Sincerely,



Bret W. Fenner, P.E.
B & D Environmental, Inc.

Enclosures

AQUA INDUSTRIES
P.O. Box 5564
Kingwood Texas 77325-5564
Phone (281)359-3062
Fax (281) 359-1228

February 1, 2015

TCEQ
P.O. Box 13087
Austin Texas 78711-3087


Re: Trinity Spring Oaks

Permit # TX0092088

Compliance Section

This letter is in response to a violation that occurred at the above referenced facility for the month of November 2014. The TSS and Ammonia concentrations were higher than the permitted level. This was due to the belts for the blower system breaking preventing the air from going to the plant. The laboratory sampled the system before the belts were replaced causing a single sample to put the facility out of limits. Once the belts were replaced the plant was back on line operating correctly. There have been no more problems since.

Should you or your staff have any questions please feel free to call at the number above.

Thank You,

Tracy Ragsdale

AQUA INDUSTRIES
P.O. Box 5564
Kingwood Texas 77325-5564
Phone (281)359-3062
Fax (281) 359-1228

October 20, 2015

TCEQ
P.O. Box 13087
Austin Texas 78711-3087


Re. Trinity Spring Oaks

Permit # TX0092088

Compliance Section / PUC

This letter is in response to a violation that accrued at the above referenced facility for the month of April 2015. The dissolved oxygen (DO) concentration for a single grab sample was lower than the permit level. This was due to the air line feeding the contact chamber had vibrated partially closed causing the flow of air to decrease. Precautions have been taken to prevent this from happening again. As of this letter this type of violation has not been repeated.

Should you or your staff have any questions please feel free to call at the number above.

Thank You, 
Tracy Ragsdale

AQUA INDUSTRIES
P.O. Box 5564
Kingwood Texas 77325-5564
Phone (281)359-3062
Fax (281) 359-1228

October 19, 2015

TCEQ
P.O. Box 13087
Austin Texas 78711-3087

Re: Trinity Spring Oaks

Permit # TX0092088

Compliance Section

This letter is in response to a violation that occurred at the above referenced facility for the month of September 2015. The E. coli concentration was higher than the permitted level. This was due to the chlorine feed system not changing over to the full chlorine bottle when the empty one ran out. The system has been repaired to work correctly and for see no more problems with the system.

Should you or your staff have any questions please feel free to call at the number above.

Thank You,

Tracy Ragsdale

AQUA INDUSTRIES
P.O. Box 5564
Kingwood Texas 77325-5564
Phone (281)359-3062
Fax (281) 359-1228

October 20, 2015

TCEQ
P.O. Box 13087
Austin Texas 78711-3087

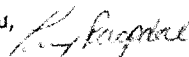
Re: Trinity Spring Oaks

Permit # TX0092088

Compliance Section / PUC

This letter is in response to a violation that accrued at the above referenced facility for the month of April 2015. The dissolved oxygen (DO) concentration for a single grab sample was lower than the permit level. This was due to the air line feeding the contact chamber had vibrated partially closed causing the flow of air to decrease. Precautions have been taken to prevent this from happening again. As of this letter this type of violation has not been repeated.

Should you or your staff have any questions please feel free to call at the number above.

Thank You, 
Tracy Ragsdale

Mr. W. Shaw
P.O. Box 100
Navasota, Texas 77868
RN102075827

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

March 26, 2015

Mr. Donald G. Clements, Director
Trinity SO GP, L.L.C.
4783 County Road 302
Navasota, Texas 77868


Re: Notice of Compliance with Agreed Order
Trinity SO GP, L.L.C.; RN102075827
TPDES Permit No. WQ0012650001
Docket No. 2014-0941-MWD-E; Enforcement Case No. 48924

Dear Mr. Clements:

This letter is to inform you that a review of Texas Commission on Environmental Quality records concerning the above-referenced enforcement matter indicates that Trinity SO GP, L.L.C. has fulfilled the requirements of the Agreed Order ("Order") effective on February 13, 2015. Specifically, Trinity SO GP, L.L.C. has fulfilled the technical requirements and paid the administrative penalty assessed in the Order. Based upon this, we conclude that your response has been satisfactory and no further action is necessary at this time with respect to this enforcement matter. The Order will terminate on February 13, 2020, provided Trinity SO GP, L.L.C. maintains compliance with all terms and conditions of the Order.

We appreciate your cooperation, and if we can be of any further assistance, please contact Ms. Jill Russell of my staff at (512) 239-4504.

Sincerely,


Sandy Van Cleave, Manager
Enforcement Division

RECEIVED
DEC 19 2014
REGION 12

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 21, 2014

CERTIFIED MAIL 7010 1670 0000 1183 6199
RETURN RECEIPT REQUESTED

Don Clemens, Owner
Trinity RCT GP, LLC
4783 County Road 302
Navasota, Texas 77868

Re: Notice of Violation for Compliance Evaluation Investigation at: Royal Coach Mobile Home Park Wastewater Treatment Plant, 14011 W. Hardy Road, Houston, (Harris County), Texas
TCEQ ID No.: WQ0012450001, EPA ID No.: TX0088650

Dear Mr. Clemens:

On July 31 and August 26, 2014, Joseph A. Reza of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for wastewater treatment. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by November 20, 2014, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Houston Region Office at 713-767-3650 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ 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. Self-reported violations may be subject to enforcement, including penalties, upon review by the Enforcement Division. We anticipate that you will resolve the alleged violations 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 violations documented in this notice.

Don Clemens
Page 2
October 15, 2014

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, Barbara Sullivan 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 any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Joseph A. Reza in the Houston Region Office at 713-422-8959.

Sincerely,



Barbara Sullivan
Team Leader
Water Quality Management
Houston Region Office

BSS/JAR/mar

cc: Tracy Ragsdale, Operator, Aqua Works, Inc., PO Box 5564, Kingwood, Texas 77325

Enclosure: Summary of Investigation Findings
Photos
Chapter 217 Table

Summary of Investigation Findings

| | |
|---|---|
| ROYAL COACH TRAILS MOBILE HOME PARK 14003 W HARDY RD HOUSTON, HARRIS COUNTY, TX 77060 | Investigation # 1185886 Investigation Date: 07/31/2014 |
| Additional ID(s): TX0088650 WQ0012450001 | |

OUTSTANDING ALLEGED VIOLATION(S)

Track No: 548729 Compliance Due Date: 09/26/2014
30 TAC Chapter 305.125(1)

PERMIT WQ0012450001, M.&R.R., No. 1, pg. 5
Monitoring and Reporting Requirements, No. 1, page 5

Alleged Violation:

Investigation: 1185886

Comment Date: 09/19/2014

Failed to complete the annual sludge report correctly. Specifically, during the investigation, the permittee was made aware that the annual sludge report for 2012-2013 incorrectly reported that the sludge was being disposed of by land application instead of other methods.

Recommended Corrective Action: Sludge data must be accurately reported. Correct and resubmit the 2012-2013 sludge report to the Houston Regional Office and the Water Quality Compliance Monitoring Team.

Track No: 548733 Compliance Due Date: 09/26/2014
30 TAC Chapter 305.125(5)

Alleged Violation:

Investigation: 1185886

Comment Date: 09/19/2014

Failed to properly maintain the facility. Specifically, the clarifier had caked solids around the weirs.

Recommended Corrective Action: Submit documentation indicating that the solids have been removed.

Track No: 548734 Compliance Due Date: 09/26/2014
30 TAC Chapter 305.125(5)

Alleged Violation:

Investigation: 1185886

Comment Date: 09/19/2014

Failed to properly operate and maintain the facility. Specifically, the chlorine contact basin contained 1.5 feet of sludge in a total water depth of 6.5 feet.

Recommended Corrective Action: The wastewater treatment plant must be operated in a manner which prevents a reduction of capacity in the chlorine contact basin and minimizes the risk of untreated or inadequately treated wastewater from being discharged to the receiving stream. Submit documentation indicating that the sludge has been removed from the chlorine contact basin and disposed of properly.

Track No: 548755 Compliance Due Date: 09/26/2014
30 TAC Chapter 305.125(1)
30 TAC Chapter 305.125(11)(B)
30 TAC Chapter 319.7(c)

PERMIT WQ0012450001, M.&R.R., No. 3(b), pg. 6
Monitoring and Reporting Requirements, No. 3(b), page 6

Alleged Violation:

Investigation: 1185886

Comment Date: 09/19/2014

Failed to make all monitoring and reporting records readily available to TCEQ personnel. Specifically, the February 2014 laboratory data from Chaparral Laboratories was not provided.

Recommended Corrective Action: All records and information resulting from the required monitoring activities shall be retained for a minimum of three years and be readily available for review by TCEQ representatives. Submit copies of the February 2014 data.

Track No: 548760**Compliance Due Date:** 09/26/2014**30 TAC Chapter 305.128(a)****Alleged Violation:**

Investigation: 1185886

Comment Date: 09/19/2014

Failed to submit a Discharge Monitoring Report (DMR) Address and Signatory Authority Update Form. Specifically, the DMR Signatory Authority Update Form has not been submitted.

Recommended Corrective Action: Submit a completed Discharge Monitoring Report (DMR) Address and Signatory Authority Update Form to the Austin TCEQ Compliance Monitoring Team of the Enforcement Division (MC224).

Track No: 548770**Compliance Due Date:** 09/26/2014**30 TAC Chapter 217.5(d)****30 TAC Chapter 217.6(c)****30 TAC Chapter 305.125(19)****Alleged Violation:**

Investigation: 1185886

Comment Date: 10/03/2014

Failed to abide by 30 TAC Chapter 217. Specifically, a Summary Transmittal letter was submitted on September 17, 2012 indicating that the plant was in compliance with 30 TAC Chapter 217. The plant is not in substantial compliance with 30 TAC Chapter 217. See attached table.

Recommended Corrective Action: Submit documentation indicating that an accurate Summary Transmittal letter has been submitted and approved, or that the plant has been brought into compliance with 30 TAC Chapter 217. If a new Summary Transmittal letter is submitted, a request must be submitted to withdraw the Summary Transmittal letter from September 21, 2012 due to inaccurate information.

ADDITIONAL ISSUES

Description

Building and grounds maintenance?

Additional Comments

Vegetation was noted on all three strands of the barbwire around the facility fence. The vegetation should be removed to ensure that intruder resistance is maintained.

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Maps, Plans, Sketches

☒ Letter to Facility (specify type) : NOV

☒ Photographs

☐ Investigation Report

☐ Correspondence from the facility

☐ Sample Analysis Results

☐ Other (specify) :

☐ Manifests

☐ Notice of Registration

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covat, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 24, 2013

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 91 7199 9991 7032 7359 7641

Mr. Donald G. Clements, Jr., Director
TRINITY SO PTN, L.P.
1320 Spring Stuebner Road
Spring, Texas 77389

Re: Review of Pending Enforcement Action for TRINITY SO PTN, L.P.
RN101236917; Public Water Supply ID No. 1012090

Dear Mr. Clements, Jr:

On February 28, 2013, the Texas Commission on Environmental Quality ("TCEQ") Enforcement Division informed you of the above-referenced pending enforcement action. This letter is to inform you that the TCEQ has completed its review of this matter, and based on the information currently available, we have determined that formal enforcement action is not warranted against TRINITY SO PTN, L.P. at this time. As such, all of the violations documented in the Notice of Enforcement letter mailed to you on February 28, 2013 are withdrawn. Applicable TCEQ databases will be updated to reflect the withdrawal of these violations.

We appreciate your cooperation in this matter and should you have any questions, please contact Ms. Abigail Lindsey of my staff at (512) 239-2576.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Cordell".

Melissa Cordell, Manager
Enforcement Division

MC/al

cc: Manager, Water Section, Houston Regional Office, TCEQ
Mr. Bob Patton, Jr., Manager, Public Drinking Water Section, Water Supply
Division, MC 155

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



MWD/, 2650001/(CO)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 16, 2013

Mr. Donald G. Clements, Director
Trinity SO GP, L.L.C.
22014 Spring Oaks Drive
Spring, Texas 77389

RECEIVED

JUN 03 2013

TCEQ
CENTRAL FILE ROOM

Re: Notice of Compliance with Agreed Order
Trinity SO GP, L.L.C.; RN102075827
Docket No. 2012-1166-MWD-E; Enforcement Case No. 44314

Dear Mr. Clements:

This letter is to inform you that a review of Texas Commission on Environmental Quality (TCEQ) records concerning the above-referenced enforcement matter indicates that Trinity SO GP, L.L.C. has fulfilled the requirements of the Agreed Order effective on November 22, 2012. Specifically, Trinity SO GP, L.L.C. has fulfilled the technical requirements and has paid the administrative penalty assessed in the Agreed Order. Based upon this, we conclude that your response has been satisfactory and no further action is necessary at this time with respect to this enforcement matter. The Order will terminate on November 22, 2017, provided Trinity SO GP, L.L.C. maintains compliance with all terms and conditions of the Order.

We appreciate your cooperation, and if we can be of any further assistance, please contact Mr. Ryan Byer at (512) 239-2571.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melinda Johnston".

Melinda Johnston, Work Leader
Enforcement Division

cc: Manager, Water Section, Houston Regional Office, TCEQ

Mr. Donald G. Clements
Page 2

bcc: Mr. Ryan Byer, Coordinator, Enforcement Division, MC 149 A
Central Records, MC 213, Building E, 1st Floor, MWD/WQ0012650001/CO
Enforcement Division Reader File

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 26, 2012

Mr. Don Clements, President
Trinity SO GP, LLC
22014 Spring Oaks Drive
Spring, Texas 77389

Re: Notice of Compliance with Notice of Violation (NOV) dated December 8, 2011 at:
The Spring Oaks Mobile Home Park Wastewater Treatment Facility, located at 4330 Pin Oak
Lane, Spring (Harris County), Texas.
TCEQ Permit No. 12650-001; EPA ID No. TX0092088

Dear Mr. Clements:

This letter is to inform you that the Texas Commission on Environmental Quality (TCEQ) Houston Region Office has received the compliance documentation that you submitted January 11, 2012, for the alleged violations noted during the investigation of the above-referenced facility conducted on October 18, 2011. The compliance documentation contained in your response appears to indicate that corrective action has been taken for the alleged violations. No further submittal from you is required concerning this investigation.

The Texas Commission on Environmental Quality 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. Nwachukwu Sam Okonkwo in the Houston Region Office at 713/767-3692.

Sincerely,

A handwritten signature in black ink, appearing to read "BSS" followed by a stylized flourish.

Barbara S. Sullivan
Team Leader
Water Quality Management
Houston Region Office

BSS/NSO/cs