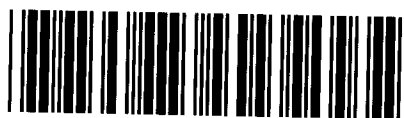




Control Number: 43587



Item Number: 19

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: bretfenner@yahoo.com

July 24, 2015

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

Re: Docket No. 43587 - Application of Trinity RTC GP, LLC. To Obtain Water and Sewer
Certificates of Convenience and Necessity in Harris County

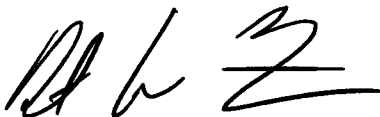
Dear Administrative Law Judge:

In regards to Order No. 7 please find the following requested information to address application deficiencies:

1. A general location map of the proposed service area and both a water and sewer large scale map of the requested service areas. The requested service area is the same for both water and sewer.
2. A disk with projected digital data showing the general location of the proposed service area and both the water and sewer requested service areas.
3. The latest Compliance Evaluation Investigation for Trinity Royal Coach (WQ0012450001) and the utility's response letter showing that all outstanding violations have been corrected.

Should you have any further questions concerning this application, please do not hesitate to contact me at (512) 264-9124.

Sincerely,



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

Enclosures

2015 JUL 24 AM 11:51
FILING CLERK

PROVIDE WQ0012450001, EPA ID TX0088650 / RESPONSE TO IN

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

November 28, 2014

TCEQ
Joseph Reza
5425 Polk St, Ste. H
Houston Texas 77023-1452

Re: Royal Coach Trails

Permit # WQ0012450001, EPA ID TX0088650

Dear Mr. Reza

This letter is in response to your inspection of the above – referenced facility. At the time of the inspection there were some items of concern.

Item 1. Please see the enclosed copy of the corrected Annual Sludge report.

Item 2. The weirs were cleaned on August 1 with the caked solids returned to the inside ring of the clarifier.

Item 3. The chlorine contact chamber was pumped out to the digester on August 5, 2014.

Item 4. Please see enclosed copy of the February 2014 laboratory data.

Item 5. Please see copy of the Signatory form.

Item 6. An updated Summary Transmittal form is being submitted to Austin. As soon as Austin makes a decision it will be forwarded to you.

Item 7. Please see enclosed pictures of the vegetation removed.

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

Thank You,

Tracy Ragsdale



RECEIVED
DEC 19 2014
REGION 12

Bryan W. Sharr, 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)

☒ Letter to Facility (specify type) : NOV

☐ Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ Notice of Registration

☒ Maps, Plans, Sketches

☒ Photographs

☐ Correspondence from the facility

☐ Other (specify) :

