

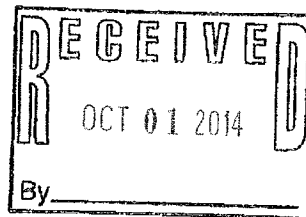
Ray

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



September 29, 2014

Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723

Re: Notice of Compliance with Notice of Violation (NOV) dated *April 22, 2014*:
Aqua Texas, Inc., Lake Conroe Forest Wastewater Treatment Facility
301 Parkhaven, Montgomery (Montgomery County), Texas
TCEQ Additional ID: WQ0014357001, Investigation No. 1159884

Dear Mr. Laughman:

This letter is to inform you that the Texas Commission on Environmental Quality (TCEQ) Houston Region Office received adequate compliance documentation on May 28, 2014 and September 22, 2014 to resolve the alleged violations documented during the investigation of the above-referenced regulated entity conducted from March 19, 2014 to April 3, 2014. Based on the information submitted, no further action is required concerning this investigation.

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 Heather Maloney at the Houston Region Office at (713)767-3776.

Sincerely,

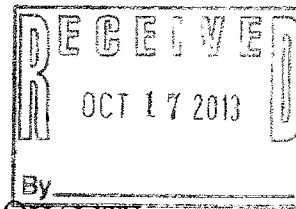
A handwritten signature in dark ink, appearing to be "ES", written over a horizontal line.

Elizabeth Sears
Team Leader
Water Quality Management
Houston Region Office

EWS/HMM/ci

cc: Abel Bautista, Wastewater Compliance Coordinator, Aqua Texas, Inc., 2211 Louetta,
Spring, Texas 77388

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 15, 2013

CERTIFIED MAIL 7012 1640 0001 7338 9004
RETURN RECEIPT REQUESTED

Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723

Re: Notice of Violation for Compliance Investigation at:
Aqua Texas, Inc.,
Lake Conroe Forest Wastewater Treatment Facility
301 Parkhaven, Montgomery, Montgomery County
TCEQ ID No.: WQ0014357001, EPA ID No.: TX0125113

Dear Mr. Laughman:

On August 21, 2013, Heather Maloney 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, a concern was noted which was an alleged noncompliance that has been resolved as an Area of Concern based on subsequent corrective action. In addition, a certain outstanding alleged violation was identified for which compliance documentation is required. Please submit to this office by November 14, 2013 a written description of the corrective action taken and the required documentation demonstrating that compliance has been achieved for the outstanding alleged violation.

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. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198.

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. 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, Ms. Elizabeth Sears will schedule a violation review meeting to be conducted within 21 days from the date of this letter.

TCEQ Region 12 • 5425 Polk St., Ste. H • Houston, Texas 77023-1452 • 713-767-3500 • Fax 713-767-3520

Austin Headquarters: 512-239-1000 • tceq.texas.gov • How is our customer service? tceq.texas.gov/customer survey

printed on recycled paper using soy-based ink.

Mr. Robert Laughman

Page 2

October 15, 2013

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 Ms. Maloney in the Houston Region Office at (713)767-3776.

Sincerely,



Elizabeth Sears
Team Leader
Water Quality Management
Houston Region Office

EWS/HMM/ci

Enclosure(s): Summary of Investigation Findings

cc: Abel Bautista, Wastewater Compliance Coordinator, Aqua Texas, Inc., 2211 Louetta,
Spring, Texas 77388

Summary of Investigation Findings

LAKE CONROE FOREST WWTP

Investigation #

1114734

Investigation Date: 08/21/2013

, MONTGOMERY COUNTY,

Additional ID(s): WQ0014357001
TX0125113

OUTSTANDING ALLEGED VIOLATION(S)

Track No: 515733 Compliance Due Date: 09/21/2013

30 TAC Chapter 319.11(d)

Alleged Violation:

Investigation: 1114734

Comment Date: 09/26/2013

Failed to measure flow in accordance with the Water Measurement Manual, United States Department of the Interior, Bureau of Reclamation. Specifically, the diffusers in the chlorine contact basin were creating turbulent conditions instead of a tranquil canal flow.

Recommended Corrective Action: "Excessive turbulence can cause measuring errors of 10 percent or more. Therefore, the flow approaching a measuring structure or device should be modified to resemble tranquil canal flow." (Chapter 5, Section 4) Submit documentation describing the action taken to create tranquil canal flow conditions in the effluent channel.

AREA OF CONCERN

Track No: 515732

30 TAC Chapter 305.125(5)

Alleged Violation:

Investigation: 1114734

Comment Date: 09/26/2013

Failed to maintain the required alarm system. Specifically, the audiovisual alarm system at the onsite lift station was not functioning.

Recommended Corrective Action: An audiovisual alarm system (red flashing light and horn) shall be provided for all lift stations. The alarm system shall be activated in case of power outage, pump failure, or a specified high water level. Submit documentation indicating that the alarm system at the onsite lift station has been repaired or replaced.

Resolution: A work order, dated August 21, 2013, for the repair of the audiovisual alarm system at the onsite lift station was received on August 26, 2013.

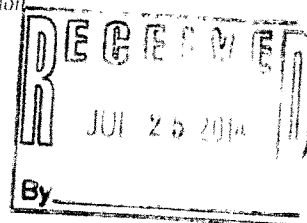
Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 22, 2014

CERTIFIED MAIL 7012 1640 0001 7339 0468
RETURN RECEIPT REQUESTED



Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723

Re: Failure to Submit Compliance Documentation for:
Aqua Texas, Inc., Lake Conroe Forest Wastewater Treatment Facility
301 Parkhaven, Montgomery, Montgomery County
TCEQ ID No.: WQ0014357001, EPA ID No.: TX0125113

Dear Mr. Laughman:

By letter dated April 22, 2014, the Texas Commission on Environmental Quality (TCEQ) Houston Region Office requested that you submit information to us by May 22, 2014 verifying that the outstanding alleged violations referenced in the letter have been corrected. The alleged violations were noted during the investigation of the above-referenced facility conducted from March 19, 2014 to April 3, 2014. Enclosed for your information is a copy of the letter. As of this date, we have not received from you a written description of corrective action taken and the required compliance documentation for these alleged violations. Please submit this information to us by no later than August 22, 2014.

The Texas Commission on Environmental Quality appreciates your assistance in this matter and looks forward to receiving your response. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements.

If you or members of your staff have any questions, please feel free to contact Ms. Heather Maloney in the Houston Region Office at (713)767-3776.

Sincerely,

A handwritten signature in black ink, appearing to be "ES", written over a horizontal line.

Elizabeth Sears
Team Leader
Water Quality Management
Houston Region Office

EWS/HMM/ci

Enclosure(s): Summary of Investigation Findings
Copy of Previous Letter

cc: Abel Bautista, Wastewater Compliance Coordinator, Aqua Texas, Inc., 2211 Louetta, Spring, Texas 77388

TCEQ Region 12 • 5425 Polk St., Ste. H • Houston, Texas 77023-1452 • 713-767-3500 • Fax 713-767-3520

Austin Headquarters: 512-239-1000 • tceq.texas.gov • How is our customer service? tceq.texas.gov/customersurvey

Summary of Investigation Findings

LAKE CONROE FOREST WWTP	Investigation # 1180339
, MONTGOMERY COUNTY,	Investigation Date: 07/11/2014
Additional ID(s): WQ0014357001 TX0125113	

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 532252 Compliance Due Date: 05/04/2014

2D TWC Chapter 26.121(a)(1)

30 TAC Chapter 305.125(4)

Alleged Violation:

Investigation: 1159884

Comment Date: 04/09/2014

Failed to prevent the unauthorized discharge of wastewater. Specifically, approximately 1,000 gallons of untreated wastewater were discharged from two customer's clean outs between March 16, 2014 and March 18, 2014.

Investigation: 1180339

Comment Date: 07/11/2014

See the violation description. Documentation to resolve this violation has not been received.

Recommended Corrective Action: There shall be no unauthorized discharge of wastewater. Submit the steps taken to prevent the recurrence of unauthorized discharges from the collection system.

Track No: 532255 Compliance Due Date: 05/04/2014

30 TAC Chapter 305.125(5)

Alleged Violation:

Investigation: 1159884

Comment Date: 04/09/2014

Failed to properly operate and maintain the facility. Specifically, the wet well at Lift Station #3 contained an excessive amount of rags, causing the lift station pumps to malfunction.

Investigation: 1180339

Comment Date: 07/11/2014

See the violation description. Documentation to resolve this violation has not been received.

Recommended Corrective Action: The rags and debris must be removed and disposed of properly in order to ensure proper functioning of the lift station and its pumps. Submit documentation indicating that the Lift Station #3 wet well is being maintained to prohibit future accumulations of rags and debris

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

April 22, 2014

CERTIFIED MAIL 7012 1640 0001 7339 3070
RETURN RECEIPT REQUESTED

Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723

Re: Notice of Violation for Compliance Investigation at:
Aqua Texas, Inc.,
Lake Conroe Forest Wastewater Treatment Facility
301 Parkhaven, Montgomery, Montgomery County
TCEQ ID No.: WQ0014357001, EPA ID No.: TX0125113

Dear Mr. Laughman

From March 19, 2014 to April 3, 2014, Heather Maloney of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an in-house 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, some concerns were identified for which compliance documentation is required. Please submit to this office by May 22, 2014 a written description of the 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. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198.

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. 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, Ms. Elizabeth Sears will schedule a violation review meeting to be conducted within 21 days from the date of this letter.

TCEQ Region 12 • 5425 Polk St., Ste. H • Houston, Texas 77023-1452 • 713-767-3500 • Fax 713-767-3520

Austin Headquarters: 512-239-1000 • tceq.texas.gov • How is our customer service? tceq.texas.gov/customersurvey

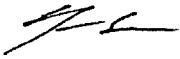
printed on recycled paper using soy-based ink

Mr. Robert Laughman
Page 2
April 22, 2014

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 Ms. Maloney in the Houston Region Office at (713)767-3776.

Sincerely,



Elizabeth Sears
Team Leader
Water Quality Management
Houston Region Office

EWS/HMM/ci

Enclosure(s): Summary of Investigation Findings

cc: Abel Bautista, Wastewater Compliance Coordinator, Aqua Texas, Inc., 2211 Louetta,
Spring, Texas 77388

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



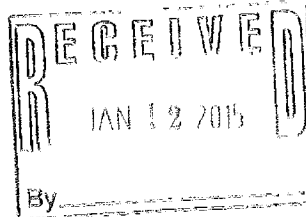
*Industrie Inc
Name*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 9, 2015

**CERTIFIED MAIL 7012 1640 0001 7339 4831
RETURN RECEIPT REQUESTED**



Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723-2426

Re: Notice of Violation for the Compliance Evaluation Investigation at:
Industrial Utilities Wastewater Treatment Plant, Harris County, Texas
TCEQ ID No.: 12122-001, EPA ID No.: TX0079383

Dear Mr. Laughman,

On November 13, 2014, Mr. Dustin Roberts 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 water quality requirements. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted as alleged noncompliances. Through subsequent corrective action, two of the alleged noncompliances have been addressed as Resolved Violations based on subsequent corrective action and written documentation. In addition, one outstanding alleged violation was identified for which compliance documentation is required. Please submit to this office by February 9, 2015 a written description of corrective actions taken and the required documentation demonstrating that compliance has been achieved for the outstanding alleged violation.

In the listing of the alleged violation, 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 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, Ms. Elizabeth Sears, Water

Robert Laughman
January 9, 2015
Page 2

Quality 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.

If you or members of your staff have any questions, please feel free to contact Mr. Dustin Roberts in the Houston Region Office at (713) 767-3631.

Sincerely,



Elizabeth Sears
Team Leader
Water Quality Management
Region 12 Houston

EWS/DAR/ci

Enclosure: Summary of Investigation Findings

cc: Abel Bautista, Wastewater Compliance Coordinator, 2211 Louetta Road, Spring, Texas
77388-4706

Summary of Investigation Findings

INDUSTRIAL UTILITIES WASTEWATER TREATMENT FACILITY , HARRIS COUNTY, Additional ID(s): WQ0012122001 TX0079383	Investigation # 1217197 Investigation Date: 11/13/2014
---	--

OUTSTANDING ALLEGED VIOLATION(S)

Track No: 557949 Compliance Due Date: 11/27/2014
30 TAC Chapter 319.7(c)

Alleged Violation:

Investigation: 1217197

Comment Date: 01/09/2015

Failed to maintain all monitoring records. Specifically, the certification for the reduced-pressure principal backflow prevention assembly (RPBA) was not available for review.

Recommended Corrective Action: All records and information resulting from the required monitoring activities shall be retained for a minimum of three years. Submit a standard operating procedure for the maintenance of monitoring records.

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 557867
30 TAC Chapter 305.125(1)
PERMIT WQ0012122001, EL&MR, No. 2
Effluent Limitations and Monitoring Requirements, No. 2

Alleged Violation:

Investigation: 1217197

Comment Date: 01/08/2015

Failed to maintain compliance with the permitted effluent limits. Specifically, the grab sample collected during the investigation was not compliant with the single grab maximum limit of 4.0 mg/L for total chlorine residual. The result of the total chlorine residual analysis was 6.52 mg/L.

Recommended Corrective Action: Compliance with the permitted effluent limits must be maintained. Submit documentation describing the action taken to prevent the recurrence of total chlorine residual violations.

Resolution: Documentation was received on December 4, 2014 indicating that proper action was taken to prevent the recurrence of total chlorine residual violations.

Track No: 557900
30 TAC Chapter 305.125(5)

Alleged Violation:

Investigation: 1217197

Comment Date: 01/08/2015

Failed to properly operate and maintain the facility. Specifically, the chlorine contact basin contained 1 foot and 2 inches of sludge in a total water depth of 8 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.

Resolution: Documentation was received on November 19, 2014 indicating that the sludge has been removed from the chlorine contact basin and disposed of properly.

3000 California (Houston)
2000 R Street (Dallas)
3000 W. Shaw (Portland)
4000 R Street (Austin)

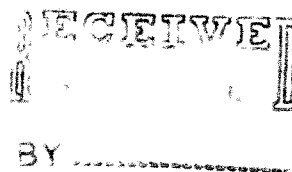
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Regulating and Preventing Pollution

May 5, 2009

CERTIFIED MAIL 7007 0710 0004 6618 9839
RETURN RECEIPT REQUESTED

Mr. Steve Blackhurst, Regulatory & Compliance Manager
Aqua Texas
1106 Clayton Lane, Suite 400 W
Austin, Texas 78723



Re: Notice of Violation for the Compliance Evaluation Investigation at: Lake Conroe Village
Wastewater Treatment Plant, Conroe, (Montgomery County), Texas
TCEQ ID No.: 14018001 EPA ID: TX0117137

Dear Mr. Blackhurst:

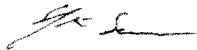
On March 3, 2009, Mr. Rick Felan with the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted a complaint investigation of the above-referenced facility to evaluate compliance with applicable requirements for wastewater treatment. Enclosed is a summary which lists the investigation findings. During the investigation, one alleged violation was identified which has been resolved through corrective action and written documentation. No further submittal from you is required concerning this investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. Self-Reported violations may be subject to enforcement, including penalties, upon review by the Enforcement Division. If you or members of your staff

Steve Blackhurst
Page 2
May 5, 2009

have any questions, please feel free to contact Mr. Rick Felan in the Houston Region Office at Phone (713)767-3612.

Sincerely,



Elizabeth W. Sears
Team Leader
Water Quality Management
Region 12 Houston

EWS/RAF/cs

Enclosure: Summary of Investigation Findings

cc: Mr. Abel Bautista, Wastewater Compliance Coordinator, Aqua Texas, 2211 Louetta Road, Spring, Texas 77388

Summary of Investigation Findings

LAKE CONROE VILLAGE

Investigation # 741273

Investigation Date: 03/03/2009

; MONTGOMERY COUNTY,

Additional ID(s): WQ0014018001
TX0117137

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

Track No: 363769

2D TWC Chapter 26.121(a)
2D TWC Chapter 26.121(a)(1)
2D TWC Chapter 26.121(a)(3)
2D TWC Chapter 26.121(b)
2D TWC Chapter 26.121(c)
2D TWC Chapter 26.121(d)
2D TWC Chapter 26.121(e)
30 TAC Chapter 305.125(4)
30 TAC Chapter 305.125(5)
TWC Chapter 26.121
TWC Chapter 26.121(a)(2)

Alleged Violation:

Investigation: 741273

Comment Date: 04/29/2009

Failure to prevent the unauthorized discharge of raw sewage from the collection system. During the investigation, a sanitary sewer overflow was observed. The cause of the unauthorized discharge was due to a broken 1 1/2 inch sewer pipe. Sanitary sewer overflows (SSOs) are not authorized. While it may not be possible to preclude all SSOs resulting from acts of vandalism or unavoidable system failures, permittees are expected to prevent all other dry weather SSO's. Permittees are required to develop and implement a program which prevents all existing and potential sources of overflows.

Recommended Corrective Action: Submit documentation indicating that the source of the sanitary sewer overflow has been corrected as well as documentation indicating that the potentially impacted area has been disinfected.

Resolution: Documentation was received on 03/06/2006 indicating that the source of the sanitary sewer overflow has been corrected as well as documentation indicating that the potentially impacted area has been disinfected.

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

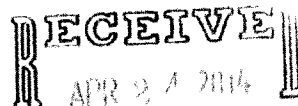
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 22, 2014

CERTIFIED MAIL 7012 1640 0001 7339 3070
RETURN RECEIPT REQUESTED

Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723



BY: _____

Re: Notice of Violation for Compliance Investigation at:
Aqua Texas, Inc.,
Lake Conroe Forest Wastewater Treatment Facility
301 Parkhaven, Montgomery, Montgomery County
TCEQ ID No.: WQ0014357001, EPA ID No.: TX0125113

Dear Mr. Laughman

From March 19, 2014 to April 3, 2014, Heather Maloney of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an in-house 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, some concerns were identified for which compliance documentation is required. Please submit to this office by May 22, 2014 a written description of the 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. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198.

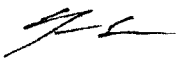
The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. Self-reported violations may be subject to enforcement, including penalties, upon review by 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. 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, Ms. Elizabeth Sears will schedule a violation review meeting to be conducted within 21 days from the date of this letter.

Mr. Robert Laughman
Page 2
April 22, 2014

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 Ms. Maloney in the Houston Region Office at (713)767-3776.

Sincerely,



Elizabeth Sears
Team Leader
Water Quality Management
Houston Region Office

EWS/HMM/ci

Enclosure(s): Summary of Investigation Findings

cc: Abel Bautista, Wastewater Compliance Coordinator, Aqua Texas, Inc., 2211 Louetta,
Spring, Texas 77388

Summary of Investigation Findings

LAKE CONROE FOREST WWTP	Investigation # 1159884
, MONTGOMERY COUNTY,	Investigation Date: 03/19/2014
Additional ID(s): WQ0014357001 TX0125113	

OUTSTANDING ALLEGED VIOLATION(S)

Track No: 532252 Compliance Due Date: 05/04/2014

2D TWC Chapter 26.121(a)(1)

30 TAC Chapter 305.125(4)

Alleged Violation:

Investigation: 1159884

Comment Date: 04/09/2014

Failed to prevent the unauthorized discharge of wastewater. Specifically, approximately 1,000 gallons of untreated wastewater were discharged from two customer's clean outs between March 16, 2014 and March 18, 2014.

Recommended Corrective Action: There shall be no unauthorized discharge of wastewater. Submit the steps taken to prevent the recurrence of unauthorized discharges from the collection system.

Track No: 532255 Compliance Due Date: 05/04/2014

30 TAC Chapter 305.125(5)

Alleged Violation:

Investigation: 1159884

Comment Date: 04/09/2014

Failed to properly operate and maintain the facility. Specifically, the wet well at Lift Station #3 contained an excessive amount of rags, causing the lift station pumps to malfunction.

Recommended Corrective Action: The rags and debris must be removed and disposed of properly in order to ensure proper functioning of the lift station and its pumps. Submit documentation indicating that the Lift Station #3 wet well is being maintained to prohibit future accumulations of rags and debris.

Lonnie

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



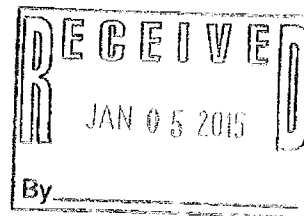
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 2, 2015

CERTIFIED MAIL 7010 170 0000 1183 6014
RETURN RECEIPT REQUESTED

Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Ln., Suite 400W
Austin, Texas 78723



Re: Notice of Violation for Compliance Evaluation Investigation at:
Imperial Valley Wastewater Treatment Plant
1330 N. Vista, Harris County Texas
TCEQ ID No.: WQ0014106-001, EPA ID No.: TX0119270

Dear Mr. Laughman:

On November 5, 2014, Kim Laird 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 February 2, 2015, 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. 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.

TCEQ Region 12 • 5425 Polk St., Ste. H • Houston, Texas 77023-1452 • 713-767-3500 • Fax 713-767-3520

Austin Headquarters: 512-239-1000 • tceq.texas.gov • How is our customer service? tceq.texas.gov/customersurvey

printed on recycled paper using soy based ink

Robert Laughman, President
January 2, 2015
Page 2

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 Kim Laird in the Houston Region Office at 713-767-3769

Sincerely,



Barbara Sullivan
Team Leader
Water Quality Management
Houston Region Office

BSS/KLJ/mar

Enclosure: Summary of Investigation Findings

cc: Abel Bautista, Compliance Coordinator, Aqua Texas, 2211 Louetta Rd, Spring, Texas
77388

Summary of Investigation Findings

IMPERIAL VALLEY WWTP

Investigation #

1211457
Investigation Date: 11/05/2014

, HARRIS COUNTY,

Additional ID(s): WQ0014106001
TX0119270

OUTSTANDING ALLEGED VIOLATION(S)

Track No: 555574 Compliance Due Date: 12/05/2014

30 TAC Chapter 305.125(5)

Alleged Violation:

Investigation: 1211457

Comment Date: 12/30/2014

Failed to maintain the structural integrity of the wastewater treatment plant. Specifically, the walls on all of the basins were rusted. See attached photographs.

Recommended Corrective Action: Submit documentation indicating that the walls for each basin have been repaired or replaced.

Track No: 555580 Compliance Due Date: 12/05/2014

30 TAC Chapter 305.125(1)

30 TAC Chapter 305.125(5)

PERMIT WQ0014106001, Operational Requirements No. 1

Operational Requirements No. 1

Alleged Violation:

Investigation: 1211457

Comment Date: 12/16/2014

Failed to properly operate and maintain the facility. The thirty minute settleable solids concentration in the aeration basin was 90%. A mixed liquor total suspended solids (MLTSS) sample was collected from the aeration basin, yielding a laboratory result of 5,800 mg/L. The SV30 compared to the MLTSS results indicate the solids are not settling well. There was accumulations of foam and solids on one-third of the surface of the aeration basin. The operator indicated that filamentous organisms were causing settling problems in the clarifier. Additionally, the sludge blanket level in the clarifier was 7 feet in a total water depth of 10 feet. The maximum recommended sludge depth is 25% of the total water depth. Also, the chlorine contact basin contained 1 foot of sludge in a total water depth of 9 feet. Documentation was submitted on November 12, 2014 indicating that the sludge has been removed from the chlorine contact basin.

Recommended Corrective Action: The wastewater treatment plant must be operated in a manner which minimizes the risk of untreated or inadequately treated wastewater from being discharged to the receiving stream. Submit documentation indicating the actions taken to properly maintain the solids level in the wastewater treatment plant.

Track No: 557398 Compliance Due Date: 12/05/2014

2D TWC Chapter 26.121(a)(1)

30 TAC Chapter 305.125(1)

30 TAC Chapter 305.125(4)

PERMIT WQ0014106001, Permit Conditions, No. 2.g

Permit Conditions, No. 2.g

Alleged Violation:

Investigation: 1211457

Comment Date: 12/30/2014

Failed to prevent the unauthorized discharge of wastewater. Specifically, during the

Investigation sludge was noted on the ground between the aeration basin and the digesters.
See attached photographs.

Recommended Corrective Action: There shall be no unauthorized discharge of wastewater. Submit the steps taken to prevent the recurrence of unauthorized discharges from the wastewater treatment plant.

Track No: 557400 **Compliance Due Date:** 11/10/2014

30 TAC Chapter 305.125(1)

PERMIT WQ0014106001, M&RR, No. 7.a & 7b(i)

Monitoring and Reporting Requirements, No. 7.a & 7b(i)

Alleged Violation:

Investigation: 1211457

Comment Date: 12/30/2014

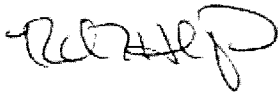
Failed to provide notification of any noncompliance which may endanger human health or safety, or the environment. Specifically, a noncompliance notification was not provided for the unauthorized discharge of sludge noted on the ground between the aeration basin and digesters on November 5, 2014.

Recommended Corrective Action: Report of such information shall be provided orally or by fax to the Regional Office within 24 hours of becoming aware of the noncompliance. A written submission of such information shall also be provided by the permittee to the Regional Office and the Enforcement Division (MC 224) within five working days of becoming aware of the noncompliance. Submit the required noncompliance notifications. Also, submit documentation outlining the steps taken to ensure the proper notification of unauthorized discharges.

Aqua Texas, Inc.
WQ 0013209-001
Page 2
September 1, 2005

If you or members of your staff have any questions, please feel free to contact Mrs. Janis Hillin in the Beaumont Region Office at (409)898-3838.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ronald Hebert', written in a cursive style.

Ronald Hebert
Water Section Work Leader
Beaumont Region Office

RH JH/pj

cc: Mr. Steve Blackhurst, Environmental Compliance Manager
Aqua Texas, Inc.
1421 Wells Branch Parkway, Suite 105
Pflugerville, Texas 78660

Enclosure. Summary of Investigation Findings

Summary of Investigation Findings

LAKE LIVINGSTON VILLAGE

Investigation # 404408

1008 WINDWOOD DR

Investigation Date: 08/09/2005

LIVINGSTON, POLK COUNTY, TX 77351

Additional ID(s): WQ0013209001

OUTSTANDING ALLEGED VIOLATIONS

Track No: 197605 Compliance Due Date: 07/05/2005

30 TAC Chapter 317.4(g)(2)

Alleged Violation:

Investigation 374578

Comment Date 3/21/2005

Failure by the permittee to provide a stairway for the clarifier which is more than four feet above ground

On the day of the investigation, it was noted that the facility does not maintain stairs to access the clarifier which is greater than four feet above ground

Investigation 404408

Comment Date 8/9/2005

In a letter received on 07/11/2005, Mr. Bautista stated that the stairway was to be installed by 09/15/2005. Submit photographs of the installed stairway to the Region 10 office

Recommended Corrective Action: Install a stairway for access to the top of the clarifier at the wastewater treatment plant (WWTP).

Submit a photograph of the installed stairway at the WWTP

ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 197583

PERMIT OpR 1

Operational Requirements, Pg. 9, No. 1

Alleged Violation:

Investigation 374578

Comment Date 3/21/2005

Failure by the permittee to ensure that all systems of collection, treatment, and disposal are properly operated and maintained

At the time of the investigation, it was noted that the chlorine contact chamber had eight inches of dark sludge, as measured near the V-notch weir

Investigation 404408

Comment Date 8/9/2005

Compliance documentation was submitted.

Recommended Corrective Action: Remove the sludge from the chlorine contact chamber (CCC). Develop and implement a standard operating procedure (SOP) to ensure that sludge does not accumulate in the CCC

Submit to the Region 10 office a written description of actions taken to clean the CCC and photographs of the CCC after it has been cleaned. Submit to the Region 10 office a copy of the SOP

Resolution: In a letter received on 07/11/2005, Mr. Bautista stated that the CCC had been cleaned on 03/18/2005 and included a letter from Millennium Consultants, Inc. verifying that the work had been completed.

Track No: 197602**PERMIT PC 1.A**

Permit Conditions Pg. 7, No. 1a

Alleged Violation:

Investigation 374578

Comment Date 3/21/2005

Failure by the permittee to accurately complete the discharge monitoring reports (DMRs) and submit them to the Water Quality Compliance Monitoring Team Enforcement Section III (MC 224) of the Enforcement Division

During a review of the self-reported effluent data recovered from the PCS database for 03/2001 through 09/2004, it was noted that the DMR for 08/2003 was reported as being late to the State in the PCS database and flow and chlorine residual data were missing from the 10/2003 and 11/2003 DMRs

Investigation 404408

Comment Date 8/9/2005

Compliance documentation was submitted

Recommended Corrective Action: Complete the DMR for 08/2003. Correct the DMRs for 10/2003 and 11/2003. Submit the completed DMR for 08/2003 and the corrected DMRs for 10/2003 and 11/2003 to the Water Quality Compliance Monitoring Team Enforcement Section III (MC 224) of the Enforcement Division

Submit copies of the corrected DMRs to the Region 10 office

Resolution: In a letter received on 07/11/2005, Mr. Bautista stated that the DMRs for 10/2003 and 11/2003 had been corrected and resubmitted to the TCEQ Central Office (MC 224) along with the DMR for 08/2003. Copies of the DMRs that were resubmitted were included in the letter

Track No: 197606**PERMIT M&RR 2**

Monitoring and Reporting Requirements Pg. 4, No. 2

Alleged Violation:

Investigation 374578

Comment Date 3/21/2005

Failure by the permittee to ensure that all measurements are accurately accomplished in a representative manner

During the review of the plant records and DMRs, it was noted that the flow that is recorded by Mr. Garcia is a totalized flow from which the previous day's flow is subtracted to arrive at the daily flow. Mr. Garcia records flow 5 days a week. On Monday, the totalized flow recovered from the flow meter includes flow for Saturday and Sunday. Mr. Garcia explained that he divides the total flow obtained on Monday by three. He then adds that amount to the totalized flow from Friday and enters that for Saturday's flow. Mr. Garcia repeats this for Sunday and Monday. It was explained to Mr. Garcia that this would not be acceptable because he would not be getting an accurate flow for Saturday, Sunday or Monday.

Investigation 404408

Comment Date 8/9/2005

Compliance documentation was submitted

Recommended Corrective Action: Develop and implement a standard operating procedure (SOP) to ensure that an accurate and representative flow measurement is recorded five days a week

Submit to the Region 10 office copies of the SOP and the operator's log for one month after

implementing the SOP

Resolution: In a letter received on 07/11/2005, Mr. Bautista submitted a copy of the SOP for recording flow measurements accurately five days a week and a copy of the operator's daily log for 06/2005 indicating that the flow is being measured accurately five days a week

Track No: 197607

PERMIT OpR 1

Operational Requirements, Pg. 9, No. 1

Alleged Violation:

Investigation: 374578

Comment Date: 4/4/2005

Failure by the permittee to ensure that all systems of collection, treatment and disposal are properly operated and maintained

At the time of the investigation, an evaluation of the mixed liquor and solids inventory was conducted. The 30-minute settleable solids (SV30) test result was 180 mL or 18%, within the recommended range of 10 - 50%. The supernatant was cloudy and the sludge was compacted with grease balls in it. A sample was collected from the aeration basin for a mixed liquor suspended solids (MLSS) and mixed liquor volatile suspended solids (MLVSS) analysis. The MLSS/MLVSS ratio was 40%, well below the recommended range of 70%-80%. The sludge volume index (SVI) was 327, well below the recommended range of 70 - 150, and the sludge density index (SDI) was 3.0, well above the recommended level of 1.0. The MLSS/MLVSS ratio is indicative of a large amount of inert solids within the plant. The SVI and the SDI indicate an older, rapidly settling sludge with poor floc formation.

At the time of the investigation, Mr. Garcia stated that he measures the sludge blanket depth once a month, collects a sample for MLSS/MLVSS analysis once a week, and performs an SV30 twice a week. The parameters and frequencies for this size facility are not as recommended in the TCEQ regulatory guidance document "Process Control Tests for Domestic Wastewater Treatment Facilities."

Investigation: 404408

Comment Date: 8/9/2005

Compliance documentation was submitted.

Recommended Corrective Action: Develop and implement a solids management plan (SMP) to operate the extended aeration plant within ranges common to accepted industry standards. The SMP shall be prepared by a Texas registered professional engineer or an "A" TCEQ Certified Wastewater Operator. The SMP shall outline a program of internal process control testing to monitor the efficiency of the wastewater treatment plant. Minimum process control testing for an activated sludge plant of this size may be found on Table 4 in the attached guidance document "Process Control Tests for Domestic Wastewater Treatment Facilities." The SMP should include detailed information regarding how process control testing will be used to appropriately manage the sludge inventory within the wastewater treatment plant, include procedures for record maintenance designed for routine evaluation of the quality and quantity of the sludge inventory. The SMP should also provide procedures designed as guidance for the operator to act on information derived from process control tests, including using the information to properly adjust the activated sludge return rate and determine the sludge wasting rate in gallons along with the sludge wasting frequency. Tasks at the plant including, but not limited to, cleaning the bar screen, removal of floatables on the clarifier and chlorine contact chamber surfaces, routine washdown procedures, observation of plant mechanical condition, wasting procedures, observation of the receiving stream condition, sludge blanket depth, and 30 minute settleability readings, shall be documented on a daily operators log. Review the SMP in the field with the wastewater treatment plant operator(s). Immediately following the field review, implement the SMP.

Submit a copy of the SMP and associated records to the Region 10 office.

Resolution: In a letter received on 07/11/2005, Mr. Bautista submitted a copy of the SMP and a copy of the standard operations procedure for the wastewater treatment plant.

Track No: 197603 Compliance Due Date: 12/31/2005

PERMIT OpR 1

Operational Requirements Pg. 9 No. 1

Alleged Violation:

Investigation: 374578

Comment Date: 3/21/2005

Failure by the permittee to ensure that all systems of collection, treatment, and disposal are properly operated and maintained.

During the investigation, it was noted that the support members in the units were showing signs of corrosion, the interior of the chlorine contact chamber was severely corroded, and the V-notch weir was severely corroded and beginning to delaminate.

Investigation: 404408

Comment Date: 8/9/2005

In a letter received on 07/11/2005, Mr. Bautista stated that Aqua Texas, Inc. expected to solicit bids for the repair to the corrosion in the wastewater treatment plant and the recoating of the entire plant by 07/30/2005, with a completion date of 12/31/2005 for the project.

Recommended Corrective Action: Repair or replace corroded areas of the aeration basin, the support members, chlorine contact chamber, and V-notch weir. Recoat the entire WWTP with corrosion-resistant paint.

Submit to the Region 10 office photographs of the repairs made to the corroded areas of the aeration basin, the support members, chlorine contact chamber, and V-notch weir. Submit to the Region 10 office photographs of the WWTP after it has been recoated.

Headquarters: Austin, Texas
Beaumont Region: Beaumont, Texas
Dallas Region: Dallas, Texas
Houston Region: Houston, Texas
San Antonio Region: San Antonio, Texas



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 26, 2006

Mr. Abel Bautista, Wastewater Compliance Coordinator
Aqua Texas, Inc.
2211 Louena Road
Spring, Texas 77388

Re: Wastewater Comprehensive Compliance Investigation of
Lake Livingston Village wastewater treatment plant, Livingston, Polk County, Texas
IPDES Permit No. 13209-001, RN102343175, CN601570773

Dear Mr. Bautista:

The Texas Commission on Environmental Quality (TCEQ) Beaumont Region Office has received the compliance documentation that you submitted October 11, 2005 and January 19, 2006 for the alleged violations noted during the investigation of the above-referenced facility conducted on February 10, 2005. 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 Janis Hiller in the Beaumont Region Office at 409/898-3838.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ronald Hebert".

Ronald Hebert
Water Section Work Leader
Beaumont Region Office

RH/JH/pj

cc: Mr. Steve Blackhurst, Environmental Compliance Manager
Aqua Texas, Inc.
1421 Wells Branch Parkway, Suite 105
Pflugerville, Texas 78660

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

LAKE LIVINGSTON VILLAGE
1008 WINDWOOD DR
LIVINGSTON, POLK COUNTY, TX 77351
Additional ID(s): WQ0013209001

Investigation # 453150
Investigation Date: 01/25/2006

ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 197603

PERMIT OpR 1
Operational Requirements, Pg. 9, No. 1

Alleged Violation:

Investigation: 374578

Comment Date: 3/21/2005

Failure by the permittee to ensure that all systems of collection, treatment, and disposal are properly operated and maintained.

During the investigation, it was noted that the support members in the units were showing signs of corrosion, the interior of the chlorine contact chamber was severely corroded, and the V-notch weir was severely corroded and beginning to delaminate.

Investigation: 404408

Comment Date: 8/9/2005

In a letter received on 07/11/2005, Mr. Bautista stated that Aqua Texas, Inc. expected to solicit bids for the repair to the corrosion in the wastewater treatment plant and the recoating of the entire plant by 07/30/2005, with a completion date of 12/31/2005 for the project.

Investigation: 453150

Comment Date: 1/25/2006

The corrosion was repaired and the plant was recoated.

Recommended Corrective Action: Repair or replace corroded areas of the aeration basin, the support members, chlorine contact chamber, and V-notch weir. Recoat the entire WWTP with corrosion-resistant paint.

Submit to the Region 10 office photographs of the repairs made to the corroded areas of the aeration basin, the support members, chlorine contact chamber, and V-notch weir. Submit to the Region 10 office photographs of the WWTP after it has been recoated.

Resolution: In a letter received 01/19/2006, Mr. Bautista stated that the wastewater treatment plant had been rehabilitated and included photographs and receipts.

Track No: 197605

30 TAC Chapter 317.4(g)(2)

Alleged Violation:

Investigation: 374578

Comment Date: 3/21/2005

Failure by the permittee to provide a stairway for the clarifier, which is more than four feet above ground.

On the day of the investigation, it was noted that the facility does not maintain stairs to access the clarifier, which is greater than four feet above ground.

Investigation: 404408

Comment Date: 8/9/2005

In a letter received on 07/11/2005, Mr. Bautista stated that the stairway was to be installed by 09/15/2005. Submit photographs of the installed stairway to the Region 10 office.

Investigation: 453150

Comment Date: 1/25/2006

A stairway was installed.

Recommended Corrective Action: Install a stairway for access to the top of the clarifier at the wastewater treatment plant (WWTP).

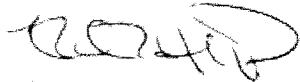
Submit a photograph of the installed stairway at the WWTP.

Resolution: In a letter received on 10/11/2005, Mr. Bautista stated that a new stairway was installed and included a photograph.

Mr. Steven Blackhurst
Page 2
December 11, 2007

If you or members of your staff have any questions, please feel free to contact Jo English in the Beaumont Region Office at (409) 898-3838.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Hebert", with a stylized flourish at the end.

Ronald Hebert
Water Section Manager
Beaumont Region Office

RH JO bd

Enclosures: *Summary of Investigation Findings*
 Obtaining TCEQ Rules

Summary of Investigation Findings

LITTLE CYPRESS BAYOU EST PLA
6300 ARMITAGE DR
ORANGE, ORANGE COUNTY, TX 77632
Additional ID(s): WQ0012109001

Investigation # 610862
Investigation Date: 12/04/2007

OUTSTANDING ALLEGED VIOLATIONS

Track No: 295801 Compliance Due Date: 02/08/2008

2D TWC Chapter 26.121(a)(1)

PERMIT PC 2g

page 7, Permit Conditions No. 2 g

Alleged Violation:

Investigation: 610862

Comment Date: 12/06/2007

Failure by Aqua Utilities to prevent unauthorized discharges from the Cypress-Bayou collection system. On 08/23/2007, Mr. Abel Bautista advised that Aqua Utilities knew that service lines on Rosewood are lower in elevation than the main line, causing sewage backup and discharges from the service line. On 09/13/2007, Mr. Mark Foust reported during a telephone call that sewage was discharged from residential clean-outs on 09/12/2007, as a result of a tripped breaker at Lift Station #2.

Recommended Corrective Action:

Develop and implement a plan and schedule to eliminate sewage backup in the affected customer service lines on Rosewood Drive.

Provide the Region 10 office with a copy of the corrective action plan. Submit documentation, including photographs, of the improvements within fifteen days of project completion.

Track No: 295803 Compliance Due Date: 02/08/2008

2D TWC Chapter 26.039(b)

PERMIT M&RR 7 a

page 5, Monitoring and Reporting Requirements No. 7a

Alleged Violation:

Investigation: 610862

Comment Date: 12/06/2007

Failure by Aqua Utilities to provide noncompliance notification within time frames specified by the permit. Specifically, Aqua Utilities failed to provide a final written report documenting corrective action taken regarding sewage discharges on 09/12/2007, within five days of the incident.

Recommended Corrective Action: Develop and implement a Standard Operating Procedure (SOP) for noncompliance reporting for prevention, and a cleanup plan for remediation of affected areas resultant from unauthorized discharges from the collection system. This plan shall include, but not be limited to, procedure for the required twenty-four hour notification and five-day written report. Please identify personnel responsible for submitting 24-hour notice and for the final written report. The written report shall contain a description of each noncompliance and its cause, the exact location of the noncompliance; the potential danger to human health or safety or the environment; the period of noncompliance, including exact dates and times, if the noncompliance has not been corrected, the time it is expected to continue, and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance, and to mitigate its adverse effects; procedures to be taken to prevent discharges of wastewater from the conveyance system; and include procedures to be taken in the event that spills or discharges do occur. These procedures shall include, at a minimum, the identification and timely removal of spilled material, and remediation of any contaminated soils. A copy of the spill prevention and control plan shall be provided to the TCEQ Region 10 Office.

Submit a copy of the SOP to the Region 10 office. Immediately begin to report all unauthorized discharges and the implemented remediation procedures to the Region 10 Office within

twenty-four (24) hours of the occurrence, and in writing within five (5) days to both the TCEQ Region 10 Office and to the TCEQ Enforcement Division (MC-149).

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



Ashley Oaks / Mike
RECEIVED
DEC 21 2012
TCEQ REGION 12

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 19, 2012

Robert Laughman, President
Ashley Oaks Mobile Home Community
1106, Clayton Lane
Austin, Texas 78723

Re: Notice of Compliance with Notice of Violation dated March 30, 2012 for: Ashley Oaks Mobile Home Community Wastewater Treatment Plant, 3504 Longwood Street, Alvin, Brazoria County, Texas
TCEQ ID No.: WQ0014039-001, EPA ID No.: TX0117234

Dear Mr. Laughman:

This letter is to inform you that Texas Commission on Environmental Quality (TCEQ) Houston Region Office has received adequate compliance documentation on September 26 2012 to resolve the alleged violation documented during the investigation of the above-referenced regulated entity conducted on January 31, 2012. Based on the information submitted, no further action 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, please feel free to contact Ms. Mary Hopkins in the Houston Region Office at 713-767-3675.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barb Sullivan".

Barbara Sullivan
Team Leader
Water Quality Management
Region 12 Houston

BSS/MVH/cs

cc: Abel Bautista, Wastewater Compliance Coordinator, Aqua Texas, 2211 Louetta Road, Spring, Texas 77288



Pollution Control Services Department

101 S. Richey, Suite H
Pasadena, Texas 77506
FAX: 713-274-6475

713-920-2831

Rae

August 27, 2015

VIOLATION NOTICE

RECEIVED

Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, TX 78723

TX ADMIN-AUSTIN

Dear Sir or Madam:

The circumstances described below constitute a violation of Chapter 26 of the Texas Water Code. You are requested to inform Compliance Coordinator Denise Hall in writing within ten (10) days of the steps being taken to be in compliance with this law and to prevent recurrence. Ms. Hall's address is: Pollution Control Services Department, 101 S. Richey, Suite H, Pasadena, TX 77506, her fax number is 713-274-6475, and her e-mail is denise.hall@pcs.hctx.net. Should you have any questions concerning this Violation Notice, or wish to arrange a conference to discuss any compliance plan, please call Ms. Hall at 713-274-6356. If the services of an independent laboratory or consultant have been used in making your response, please provide the name and address.

NAME OF OFFENDER: Aqua Texas – Oakwood Village MHP

NATURE OF VIOLATION:

On August 5, 2015 at 9:53 a.m., Bryan Kosler of this office collected a sample from the Oakwood Village Mobile Home Park Wastewater Treatment Plant – Outfall 001. Analysis of this sample using accepted analytical methods determined the following violation of discharge permit number WQ12303-01:

<u>ITEM</u>	<u>DETERMINED CONCENTRATION</u>	<u>LIMIT</u>
E. coli	370 mpn/100ml	197 mpn/100ml

VIOLATION NOTICE

Aqua Texas, Inc.

August 27, 2015

Page 2

Under the Texas Water Code you are subject to civil penalties of \$50 to \$25,000 per day, criminal penalties of up to \$250,000 per day or more for each violation, and possible confinement up to 10 years or more. Under the Regulations of Harris County for Storm Water Quality Management, you may be subject to civil penalties up to \$1,000 per day. A case-by-case review is conducted when each Violation Notice is issued. The ultimate disposition of each case is dependent upon factors such as the nature, magnitude and duration of this violation, steps taken to mitigate the violation, previous violations, and the contents of any response received. In the event that further enforcement action is appropriate, this office may file charges in a court of proper jurisdiction, as provided by law.

Sincerely,



Michael Cantu

Manager – Laboratory Services


MC/ljg

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



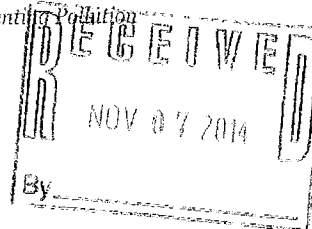
Ronnie

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 5, 2014

CERTIFIED MAIL 7012 1640 0001 7339 2233
RETURN RECEIPT REQUESTED



Robert Laughman, President
Aqua Texas, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723

Re: Notice of Violation for the Compliance Evaluation Investigation at:
Pine Trails Wastewater Treatment Facility, Houston, Harris County
TCEQ ID No.: WQ0011701001, EPA ID No.: TX0068683

Dear Mr. Laughman:

On September 16, 2014, Ms. Valerie Burkett 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 water quality requirements. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted as alleged noncompliances or additional issues. Through subsequent corrective action, one alleged noncompliance has been resolved. In addition, one outstanding alleged violation was identified for which compliance documentation is required. Please submit to this office by December 5, 2014 a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for the outstanding alleged violation.

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.

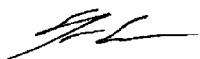
The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. Self-reported violations may be subject to enforcement, including penalties, upon review by 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. Should you choose to do so, you must notify the Houston

Robert Laughman
November 5, 2014
Page 2

Region Office within 10 days from the date of this letter. At that time, Ms. Elizabeth Sears, Water Quality 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 any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Valerie Burkett in the Houston Region Office at 713-767-3690.

Sincerely,



Elizabeth Sears
Team Leader
Water Quality Management
Region 12 Houston

EWS/VAB/ci

cc: Abel Bautista, Aqua Texas, Inc., 2211 Louetta Road, Spring, TX 77388

Enclosures: Summary of Investigation Findings

Summary of Investigation Findings

PINE TRAILS

, HARRIS COUNTY,

Additional ID(s): WQ0011701001
TX0068683

Investigation #

1204446

Investigation Date: 09/16/2014

OUTSTANDING ALLEGED VIOLATION(S)

Track No: 552286 Compliance Due Date: 09/30/2014

30 TAC Chapter 305.125(1)

30 TAC Chapter 305.125(11)(B)

30 TAC Chapter 319.7(c)

PERMIT WQ0011701001, Monitoring and Reporting Requirements
No. 3.b

Alleged Violation:

Investigation: 1204446

Comment Date: 10/28/2014

Failed to make all monitoring and reporting records readily available to TCEQ personnel. Specifically, the most recent reduced pressure backflow assembly check certificates were not available for review during the inspection on 09/16/2014.

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 a copy of the most recent RPBA check certificate.

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 552293

30 TAC Chapter 319.11(b)

Alleged Violation:

Investigation: 1204446

Comment Date: 10/28/2014

Failed to ensure proper preservation of effluent samples. Specifically, the thermometer utilized in the composite sampler was not a National Institute of Standards and Technology (NIST) -traceable thermometer that had been calibrated in the previous 12 months as required.

Recommended Corrective Action: To ensure proper preservation of effluent samples, the thermometer must be annually checked against a precision thermometer certified by the NIST. Submit documentation indicating that an acceptable thermometer is being used in the composite sampler.

Resolution: On 10/02/2014, documentation was submitted indicating that the thermometer in use at the composite sampler has been checked against a precision thermometer certified by the NIST on 9/18/2014.

ADDITIONAL ISSUES

Description

Building and grounds maintenance?

Additional Comments

During the investigation it was noted that certain areas of the walkway were starting to corrode, which may lead to hazardous conditions for the operator in the future. The walkway should be regularly monitored for holes and repaired or replaced as needed.

PINE TRAILS**Investigation # 1204446**

Are the flow measuring devices(s) properly installed, operated and maintained?

The circular flow charts showed sharp spikes in flow rate consistently for several years of data, which may be indicative of a problem with the equipment. This issue should be addressed in order to ensure accurate flow records are being kept.

Does the receiving stream have such conditions as foaming, floating materials, sludge deposits, or color and turbidity?

At the time of the investigation, grease balls and a feminine product wrapper were discovered in the receiving stream. The operator cleaned up the debris during the investigation. Every effort should be made to prevent the discharge of floating solids from the wastewater treatment plant.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

May 11, 2007

**CERTIFIED MAIL {No. 7005 1820 0003 8110 0914}
RETURN RECEIPT REQUESTED**

Mr. Steve Blackhurst
Aqua Texas, Inc.
1421 Wells Branch Parkway
Suite 105
Pflugerville, Texas 78660

Re: Notice of Violation for the Comprehensive Compliance Investigation at.
Aqua Texas Port Adventure, 318 Cardinal Blvd., Trinity (Trinity County), Texas
TCEQ ID No.. WQ0014096-001

Dear Mr. Blackhurst

On April 4, 2007, Scott Griffith of the Texas Commission on Environmental Quality (TCEQ) Beaumont conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for wastewater treatment. Enclosed is a summary which lists the investigation findings. In addition, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **July 10, 2007**, 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 alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules." Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at (800) 490-9198.

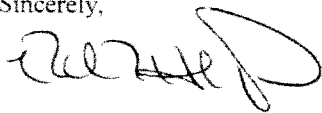
The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice.

Steve Blackhurst
WQ/0014096-001
Page 2
May 11, 2007

Should you choose to do so, you must notify Beaumont Region Office within 10 days from the date of this letter. At that time, Mr. Ronald Hebert 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 Mr. Scott Griffith in the Beaumont Regional Office at (409) 898-3838.

Sincerely,



Ronald Hebert
Water Section Manager
Beaumont Region Office

RH/SG:pj

Enclosures: Summary of Investigation Findings
 Obtaining TCEQ Rules

Summary of Investigation Findings

PORT ADVENTURE
318 CARDINAL BLVD
TRINITY, TRINITY COUNTY, TX 75862
Additional ID(s): WQ0014096001

Investigation # 557912
Investigation Date: 04/04/2007

OUTSTANDING ALLEGED VIOLATIONS

Track No: 273439 Compliance Due Date: 06/10/2007

PERMIT D&SPC, 1(b)&(c)

Definitions and Standard Permit Conditions, 1(b)&(c) Pg. 3

Alleged Violation:

Investigation: 557912

Comment Date: 05/02/2007

Failure to accurately accomplish daily average flow calculations and daily maximum flow determinations. During the review of the operational records and discharge monitoring reports it was noted that the daily average flow and daily maximum flow are being improperly calculated and reported. The operator is recording totalized flows five days per week from which the previous day's flow is subtracted to arrive at the daily flow. On Mondays the operator recovers the totalized flow from the flow meter which includes the flow for Saturday and Sunday. The operator then averages the flow for the three days and uses those flows for reporting. The operator and Mr. Bautista were advised that averaging is not an acceptable means because the flow for Saturday, Sunday, and Monday would not be accurate. This is a repeat alleged violation.

Recommended Corrective Action: Develop and implement a standard operating procedure (SOP) for properly calculating the daily average flow and the daily maximum flow.

Please submit a letter describing the actions of permittee and a copy of the SOP to the Region 10 office.

Track No: 273543 Compliance Due Date: 06/10/2007

PERMIT M&RR, No. 7c

Monitoring and Reporting Requirements, No. 7(c) Pg. 6

Alleged Violation:

Investigation: 557912

Comment Date: 05/07/2007

Failure to report non-compliances greater than 40% of the effluent limitations to the TCEQ regional office and the Manager of the Water and Multimedia Section (MC 149) of the Enforcement Division within five working days of becoming aware. During a records review it was noted that many non-compliances greater than 40% of the permitted effluent limits were not properly reported. Out of the eight non-compliances greater than 40%, the permittee failed to report the following non-compliances to the Beaumont Regional office:

TSS Daily Average 24.2 mg/l on 05/05;
TSS Daily Maximum 72 mg/l on 05/05;
Ammonia Daily Average 4.4 mg/l on 09/05;
Ammonia Daily Maximum 18.0 mg/l on 04/06;
and Ammonia Daily Maximum 19.4 mg/l on 07/06.

Based on a review of self-reported data for daily average, with Mr. Bautista, it became apparent that the permittee was evaluating the sample analysis results for ammonia and total suspended solids (TSS) against the single grab limit on the discharge monitoring report in lieu of the daily maximum established in the permit.

Recommended Corrective Action: Develop and implement a standard operating procedure to ensure proper notification is given for effluent violations which deviated from the permitted effluent limitation by more than 40%. Begin submitting noncompliance notifications to the Beaumont Regional Office and the Manager of the Water and Multimedia Section (MC 149) Enforcement Division, P.O. Box 13087 Austin, TX 78711-3087 within the time constraints specified in the permit.

Please submit a letter describing the actions of the permittee and a copy of the standard operating procedure to the Beaumont Regional Office.

Track No: 273551 **Compliance Due Date:** 06/10/2007

PERMIT OT, No. 5

Other Requirements, No. 5, Pg. 23

Alleged Violation:

Investigation: 557912

Comment Date: 05/07/2007

Failure to submit a copy of the annual sludge report to the Regional office of the TCEQ. During the records review, it was noted a copy of the August 1, 2005 thru July 31, 2006, annual sludge report was not submitted to the Regional office of the TCEQ. During the investigation, Mr. Bautista indicated that the report had been submitted to the Central office of the TCEQ, however, he could not recall if a copy being submitted to the Region 10 office of the TCEQ.

Recommended Corrective Action: Develop and implement a standard operating procedure that ensures annual sludge reports are submitted the TCEQ Central office and the Regional

Please submit a letter describing the actions of the permittee, a copy of the annual sludge report, and a copy of the SOP to the Region 10 office.

Track No: 273557 **Compliance Due Date:** 06/10/2007

PERMIT OpR, No. 1

Operational Requirements, No. 1, Pg. 9

Alleged Violation:

Investigation: 557912

Comment Date: 05/02/2007

Failure by the permittee to properly operate and maintain all systems of collection, treatment, and disposal. The control box serving lift station number two was not locked as to prevent tampering. The provisions for the locking the control box were damaged.

Recommended Corrective Action: Properly secure the control box as to prevent any vandalism or tampering.

Please submit a letter describing the actions of the permittee and photographic documentation to the Region 10 office.

Track No: 273600 **Compliance Due Date:** 07/10/2007

PERMIT OpR, No. 1

Operational Requirements, No. 1, Pg. 9

Alleged Violation:

Investigation: 557912

Comment Date: 05/02/2007

Failure by the permittee to properly operate and maintain all systems of collection, treatment, and disposal. The fence serving the west side wastewater treatment plant was damaged.

Recommended Corrective Action: Repair or replace the damaged portion of the fence as make it intruder resistant.

Please submit a letter describing the actions of the permittee and photographic documentation

ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 197712

PERMIT OpR 1

Operational Requirements, Pg. 9 No. 1

Alleged Violation:

Investigation 375037

Comment Date 03/21/2005

Failure by the permittee to ensure that all systems of collection, treatment, and disposal are properly operated and maintained.

During the investigation, it was noted that there were failing coatings throughout the plant, the interior of the chlorine contact chamber exhibited corrosion, and the V-notch weir was severely corroded and beginning to delaminate.

Investigation 404319

Comment Date 08/09/2005

In a letter received on 07/07/2005, Mr. Bautista stated that Aqua Texas Inc. expected to solicit bids for the repair to the chlorine contact chamber and the V-notch weir and the recoating of the entire plant by 07/30/2005, with a completion date of 12/31/2005 for the project.

Investigation 435737

Comment Date 10/27/2005

A revised compliance plan was submitted.

Investigation 557912

Comment Date 05/02/2007

The permittee re-coated wastewater treatment plant and submitted photographic documentation on April 5, 2007.

Recommended Corrective Action: Repair or replace corroded areas of the chlorine contact chamber (CCC) and the V-notch weir. Recoat the entire wastewater treatment plant (WWTP) with a corrosion-resistant paint.

Submit to the Region 10 office photographs of the CCC and V-notch after repair and the WWTP after recoating it.

Resolution: The permittee re-coated wastewater treatment plant and submitted photographic documentation on April 5, 2007. The re-coating of the plant was confirmed during the April 4, 2007, investigation.

ADDITIONAL ISSUES

Description

Has the regulated entity abandoned or closed any pit, tank, pond, lagoon, or surface impoundment regulated by the permit and appropriately notified the Executive Director at least 90 days prior to conducting such activity? If yes, has a closure plan been submitted?

Chlorination system?

Additional Comments

During this investigation it was noted that the former settling pond adjacent to the wastewater plant appeared idle. If this pond is no longer in use and is not intended for future use, it must be properly closed out and notification must be provided to the Executive Director at least 90 days prior to conducting any such activity.

The forced air ventilation serving chlorination housing is located on the upper vent. The fan draws air from the enclosure and discharges it to the atmosphere through upper vent. Forced air ventilation should draw air in through the top vent and discharge to the outside atmosphere through the floor level vent, as a measure of safety in the event of leak.

Item two

During the investigation basic process control tests were conducted. The mixed liquor in the aeration basin was dark chocolate brown in color but appeared thin. The recommended color is a chocolate brown. The results of the 30 minute settleability test (SV 30) conducted on the mixed liquor indicate the liquor settled to 35% after 5 minutes and 18% after 30 minutes. A settleability of between 10% and 50% is generally recommended. The MLSS from the aeration basin was 2800 mg/L. The recommended range is between 3000 and 6000 mg/L. The MLVSS from the aeration basin was 2010 mg/l. The MLVSS to MLSS ratio is 71%. The recommended ratio is between 70 and 80%. The sludge volume index (SVI) at the time of the investigation was 64.3. An SVI between 70 and 150 is typical for a healthy activated sludge. An SVI below 70 indicates poor floc formation due to rapid settling. The sludge density index (SDI) was 1.5. An SDI greater than 1.0 indicates a denser sludge that settles rapidly. During the evaluation of the clarifier a sludge blanket was not noted. A sludge blanket level of no more than 25% of the total clarifier depth is generally recommended. These results indicate the plant is operating outside the recommended ranges for SVI and SDI. The SVI, SDI, and sludge blanket depth indicates a poorly forming dense floc that settles rapidly. An evaluation of these results indicates that the solids in the plant are getting old as well. The plant was recently placed back into service and was re-seeded with activated sludge six weeks prior to the CCI. Based on the circumstances and sample results the permittee should determine the food to microorganism ratio, sludge age and perform microscopic examination of the activated sludge to determine the sludge health. The permittee should analyze the results and take the appropriate actions to bring the plant back into the recommended ranges.

Have unauthorized discharges occurred at the plant or in the collection system since the last CCI?

A file review indicates the permittee has reported six unauthorized discharges from the collection system since the last compliance investigation on February 10, 2005. The following discharges were self reported by the permittee: on April 4, 2005, a discharge occurred at the wastewater treatment plant lift station due to line break; two discharges occurred from manholes on Port Boulevard on April 19, 2005, due to grease; on May 18, 2005, a discharge from a six inch sewer clean out was attributed to inflow and infiltration; a discharge on July 26, 2005, from a four inch force main occurred at the wastewater treatment plant, and on September 26, 2005, lift station numbers two and three discharge due to a power failure. The permittee took appropriate corrective action and properly reported the unauthorized discharges. The permittee should develop a routine maintenance and monitoring program to address line breaks resulting in unauthorized discharges. Further, the permittee should implement a grease abatement program with provisions for enforcement, maintenance and public education.

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



Ruke

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 22, 2015

CERTIFIED MAIL 7013 3020 0000 9763 4209
RETURN RECEIPT REQUESTED

RECEIVED

DEC 24 2015

TX ADMIN-AUSTIN

Robert Laughman, President
Aqua Development, Inc.
1106 Clayton Lane, Suite 400W
Austin, Texas 78723

Re: Notice of Violation for the Compliance Evaluation Investigation at:
Old Egypt Regional Business Center Wastewater Treatment Plant, 32515 Farm-to-Market
Road 2978, Spring, Montgomery County, Texas
TCEQ ID No.: WQ0014141001, EPA ID No.: TX0120073

Dear Mr. Laughman,

On October 8, 2015, Mr. Dustin Roberts 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 water quality requirements. Enclosed is a summary which lists the investigation findings. During the investigation, one outstanding alleged violation was identified for which compliance documentation is required. Please submit to this office by January 25, 2016 a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for the outstanding alleged violation. In addition, one violation has been resolved as a Resolved Violation. Also, please see the Additional Issue.

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 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