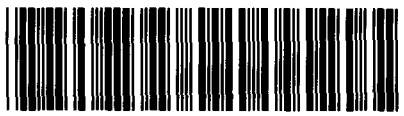
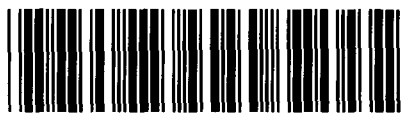


Control Number: 46245



Item Number: 572

Addendum StartPage: 0

RECEIVED
2017 JUL 28 PM 1:55
PUBLIC UTILITY COMMISSION
FILING CLERK

SOAH DOCKET NO. 473-17-0119.WS
PUC DOCKET NO. 46245

APPLICATION OF DOUBLE DIAMOND UTILITY COMPANY, INC. FOR WATER AND SEWER RATE/TARIFF CHANGE	§ § § §	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

DOUBLE DIAMOND UTILITY COMPANY, INC.'S RESPONSE TO THE CLIFFS RATEPAYER GROUP'S SECOND REQUEST FOR INFORMATION TCUC NO. 2-1 THROUGH 2-13

COMES NOW, Double Diamond Utility Company, Inc. ("DDU") and files its Response to the Cliffs Ratepayers Group's Second Request for Information – TCUC NO. 2-1 through 2-13. DDU agrees and stipulates that all parties may treat these responses as if they were filed under oath.

Respectfully submitted,

By: _____

John J. Carlton
The Carlton Law Firm P.L.L.C.
2705 Bee Cave Road, Suite 200
Austin, Texas 78746
(512) 614-0901
Fax (512) 900-2855
State Bar No. 03817600

ATTORNEY FOR DOUBLE DIAMOND UTILITY COMPANY, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 28th day of July, 2017

_____
John Carlton

572

TCUC'S SECOND REQUEST FOR INFORMATION TO
DOUBLE DIAMOND UTILITY COMPANY, INC.
TCUC NO. 2-1 THROUGH 2-13

PLEASE NOTE: DDU and TCUC have agreed that TCUC's Requests for Information are as restated below:

TCUC 2-1 Please provide the basis and analysis relied upon by Double Diamond for allocation of the expenses titled "Allocated Resort Overhead" and "Allocated Resort G&A" and the analysis, work papers, and source documentation relied upon by Double Diamond to arrive at the allocation of expenses to The Cliffs water utilities.

RESPONSE The allocation of "Allocated Resort Overhead" costs are based on the budget numbers for The Cliffs Resort and percentage of resources used by The Cliffs water utilities. There is no "Allocated Resort G&A" requested in The Cliffs application.

Responsive documents will be produced.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-2 Please provide the analysis and means by which security is allocated to The Cliffs and the analysis, work papers, and source documentation relied upon by DDU to arrive at the allocation of expenses to The Cliffs water utilities.

RESPONSE: Security is not allocated to The Cliffs water utilities in the application.

Prepared by: Jay Joyce

Sponsored by: Jay Joyce

TCUC 2-3 Please provide the analysis and means by which insurance is allocated to The Cliffs as found on the Schedule of Insurance and the analysis, work papers, and source documentation relied upon by DDU to arrive at the allocation of expenses to The Cliffs water utilities.

RESPONSE: Insurance is allocated to The Cliffs based on number of people, trucks and equipment per resort then per department.

Responsive documents will be produced.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-4 DDU003586 provides a listing of company-wide notes payable and interest rates. There is one note for $3,000,000 that lists collateral as "utility assets." Which system's assets were pledged as collateral for the loan? Please provide an itemized accounting of the spending of funds obtained through this loan.

RESPONSE: Water and wastewater utility assets located within the White Bluff Resort.

The requested itemized accounting information does not exist. This is akin to asking for an itemized list of the components of a house paid for with mortgage proceeds and another itemized list of the components of the house paid for with from the down payment. The request doesn't make sense.

The characteristics of the referenced loan were used in the applications to establish the reasonable cost of debt incorporated into the capital structure to produce an overall cost of capital for DDU which is applied to rate base to yield a reasonable return.

Prepared by: Christie Rotramel and Jay Joyce

Sponsored by: Tim Grout and Jay Joyce

TCUC 2-5 For any of the purchase agreement that Double Diamond or any affiliate entered into with property owners for lots in the ~~White Bluff~~ The Cliffs subdivision contain representations that Double Diamond or an affiliate would be responsible for the providing necessary infrastructure to supply water and sewer to the lot, please provide an itemized detail as to which entities would install the utility infrastructure referenced in this response.

RESPONSE: Utility infrastructure has been in installed by Double Diamond Inc (DDI), Double Diamond Properties Construction (DDPC) or Double Diamond Utilities (DDU) at various times. Before 1996, most all of infrastructure was constructed and paid for by DDI. DDPC and DDU were created in December 1996. In 1997, DDPC began paying for most of the infrastructure, and DDU paid for a few items. Payment for utility infrastructure is identified and itemized in the invoices whose bates number are referenced on the asset list previously produced. As of the 2007-2008 rate case before the Texas Commission on Environmental Quality, most of the initial utility infrastructure was completed, and DDU begin paying for all utility assets and operations. The same contractors and employees worked for each entity that paid for the infrastructure.

Prepared by: Christie Rotramel

Sponsored by: Randy Gracy

TCUC 2-6 Please provide work papers and all documents relied upon by Double Diamond in preparing its financial statements as provided beginning on DDU003567 to arrive at the cost of water/wastewater systems listed on DDU003584 in the amount of $4,870,225 in native format (excel or similar).

RESPONSE: Responsive documents have been produced in native format as DDU16-015228 – DDU16-015231 in response to the White Bluff Ratepayers Group RFI No. 3-6.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-7 Admit or deny. Attachment A is a true and accurate copy of a Warranty Deed conveying the tracts listed on Exhibit "A" from Double Diamond, Inc., to The Cliffs Property Owners Association, Inc dated December 20, 1995.

RESPONSE: DDU can neither admit or deny because no document was attached.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-8 Admit or deny. Attachment B is a true and correct copy of a form Real Estate Sales Contract used to sell property in The Cliffs subdivision to purchasers.

RESPONSE: DDU can neither admit or deny because no document was attached.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-9 Please provide copies of all communications with the Texas Commission on Environmental Quality that occurred during the test year for The Cliffs systems.

RESPONSE: Responsive documents will be produced.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-10 Please provide copies of all public notifications required by the Texas Commission on Environmental Quality since January 1, 2014, for The Cliffs water system.

RESPONSE: Responsive documents will be produced.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-11 If Double Diamond provides potable water to the wastewater treatment plant serving The Cliffs subdivision, please provide copies of all bills for the water service to the plant for 2015.

RESPONSE: No responsive documents exist.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-12 Provide copies of the asset depreciation schedules from the draft IRS Forms 1120 for Double Diamond Utilities, Inc., for the years 2000 to 2016.

RESPONSE: Per agreement, the depreciation schedules for DDU attached to the consolidated IRS Forms 1120 tax returns for Double Diamond Delaware has been produced in accordance with the protective order issued in this case as DDU1616-015436 –DDU16-015483 in response to the White Bluff Ratepayers Group RFI No. 3-16.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

TCUC 2-13 The Cliffs Utility Committee requests that the Administrative Law Judge presiding over this PUC Docket No. 46245 require Double Diamond Utility Co. to prove conclusively with adequate documentation their need for a rate increase at The Cliffs in formal hearing and disallow any rate increase if their proven return on investment exceeds industry standards.

RESPONSE: This is not a question. DDU cannot answer it.

Prepared by: Christie Rotramel

Sponsored by: Tim Grout

RESPONSIVE TO TCUC NO. 2-1

Double Diamond Companies
2015 Budget
Cliffs Club Corp. - Allocations - 8022
L APPROVED POSITIONS MUST BE LISTED - FULL TIME and PART TIME POSITION

Fixed cost Employees

	Employee Name	Title	Existing Annual Rate	Beg Week	End Week	% Spent for each area: Sales	POA	Hosp	Utilities	Const		Sales	POA	Hosp	Utilities	Const	
1		General Manager	103,887	1	52	0%	36%	58%	6%	0%	100%	-	37,399	60,255	6,233	-	103,887
2			-	1	52	0%	21%	72%	7%	0%	100%	-	-	-	-	-	-
3		Accounts Payable/Payroll	25,000	1	52	0%	34%	53%	13%	0%	100%	-	8,500	13,250	3,250	-	25,000
4		Receptionist	20,800	1	52	0%	23%	70%	7%	0%	100%	-	4,784	14,560	1,456	-	20,800
5		Security Manager	28,000	1	52	0%	72%	22%	6%	0%	100%	-	20,160	6,160	1,680	-	28,000
6		Human Resources Admn	29,417	1	52	0%	21%	72%	7%	0%	100%	-	6,178	21,180	2,059	-	29,417
7						0%	21%	72%	7%	0%	100%	-	-	-	-	-	-
8	Raise		-	18	52	0%	53%	34%	13%	0%	100%	-	-	-	-	-	-
	Proposed New Position										0%	-	-	-	-	-	-
	Subtotal - Salaries		207,104									-	77,021	115,405	14,678	-	207,104
	Variable cost Employees											0.000%	37.189%	55.723%	**7.087%**	0.000%	100.000%

Hourly Wages

	Employee Name	Position	Beg Week	End Week	Rate	Hours per Week												
1								47%	38%	15%	0%	100%	-	-	-	-	-	-
2	Dakota Lewis	PBX	1	52	8	40	0%	26%	68%	6%	0%	100%	-	4,193	10,967	968	-	16,128
3												0%	-	-	-	-	-	-
4												0%	-	-	-	-	-	-
5												0%	-	-	-	-	-	-
6												0%	-	-	-	-	-	-
7												0%	-	-	-	-	-	-
8												0%	-	-	-	-	-	-
9												0%	-	-	-	-	-	-
10												0%	-	-	-	-	-	-
11	Raise		18	52	-	40						0%	-	-	-	-	-	-
	Proposed New Position											0%	-	-	-	-	-	-
	Variable cost Subtotal - Hourly Wages												-	4,193	10,967	968	-	16,128
													0.00%	26.00%	68.00%	**6.000%**	0.00%	100.00%

Hourly Wages - SECURITY

	Employee Name	Position	Beg Week	End Week	Rate	Hours per Week												
1		SECURITY - Sgt	1	52	8.50	40	2%	70%	22%	6%	0%	100%	354	12,376	3,890	1,061	-	17,680
2		SECURITY - Lt.	1	52	9.25	40	0%	72%	22%	6%	0%	100%	-	13,853	4,233	1,154	-	19,240
3		SECURITY	1	52	8.00	40	0%	72%	22%	6%	0%	100%	-	11,981	3,661	998	-	16,640
4		SECURITY	1	52	8.25	40	0%	72%	22%	6%	0%	100%	-	12,355	3,775	1,030	-	17,160
5		SECURITY	1	52	8.00	40	0%	72%	22%	6%	0%	100%	-	11,981	3,661	998	-	16,640
6		SECURITY	1	52	8.00	40	0%	72%	22%	6%	0%	100%	-	11,981	3,661	998	-	16,640
7		SECURITY	1	52	8.00	40	0%	72%	22%	6%	0%	100%	-	11,981	3,661	998	-	16,640
8		SECURITY	20	37	8.00	0	0%	72%	22%	6%	0%	100%	-	-	-	-	-	-
9	Increase Security Positions by $1/hour		32	52	7	40	0%	72%	22%	6%	0%	100%	-	4,234	1,294	353	-	5,880
10	Raise		18	52	-	40						0%	-	-	-	-	-	-
	Proposed New Position											0%	-	-	-	-	-	-
	Variable cost Subtotal - SECURITY												354	90,741	27,834	7,591	-	126,520
													0.28%	71.72%	22.00%	**6.000%**	0.00%	100.00%

Hourly Wages

	Employee Name	Position	Beg Week	End Week	Rate	Hours per Week												
1			1	52								0%	-	-	-	-	-	-
2			1	52								0%	-	-	-	-	-	-
3			1	52								0%	-	-	-	-	-	-
4			1	52								0%	-	-	-	-	-	-
5			1	52								0%	-	-	-	-	-	-
6			14	52								0%	-	-	-	-	-	-
	Proposed New Position												-	-	-	-	-	-
	Variable cost Subtotal												-	-	-	-	-	-
	Total Salary & Wages	ALLOCATIONS											354	171,955	154,206	23,237	-	349,752
													#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	
													0.10%	49.16%	44.09%	**6.644%**	0.00%	100.00%

Raise

	Sales	POA	Hosp	Utilities	Const	Total
curr yr empl salary	0.00%	37.19%	55.72%	7.09%	0.00%	100.00%
curr yr empl hrly	0.00%	26.00%	68.00%	6.00%	0.00%	100.00%
curr yr empl front of house	0.28%	71.72%	22.00%	6.00%	0.00%	100.00%
curr yr blended %	0.10%	49.16%	44.09%	6.64%	0.00%	100.00%

New	Description		Period1	Period2	Period3	Period4	Period5	Period6	Period7	Period8	Period9	Period10	Period11	Period12	total
Payroll and Related Expenses															
6001-0000	Employee Compensation	7 087%	1,129	1,129	1,411	1,129	1,129	1,411	1,129	1,129	1,411	1,129	1,129	1,411	14,678
6030-0000	Commission/Bonus	7 087%	248	-	-	248	-	-	248	-	-	319	-	-	1,063
6050-0000	Hourly Wages	6 000%	61	61	96	77	77	96	77	77	96	77	77	96	968
6050-0001	Hourly Wages - Front House	6.000%	557	557	696	557	557	696	557	607	780	624	624	780	7,591
6050-0002	Hourly Wages - Back House	7.087%	-	-	-	-	-	-	-	-	-	-	-	-	-
6100-0000	Labor Transfers	6.644%	-	-	-	-	-	-	-	-	-	-	-	-	-
6200-0000	Payroll Burden	6 644%	316	279	352	319	282	352	319	291	367	341	294	367	3,877
6400-0000	Contract Labor	6.644%	-	-	-	-	-	-	-	-	-	-	-	-	-
6600-0000	Other Employee Expense	6.644%	33	33	13	13	13	40	40	13	33	13	13	13	272
			2,345	2,059	2,569	2,343	2,058	2,595	2,369	2,117	2,687	2,503	2,137	2,668	28,450
Occupancy Expense															
7010-0000	Electricity	6.644%	50	50	60	50	50	66	60	60	50	37	37	50	618
7020-0000	Gas/Propane	6.644%	5	7	8	5	8	5	17	7	8	12	12	17	110
7030-0000	Water / Sewer	6.644%	12	5	5	68	101	20	55	73	93	43	37	40	551
7040-0000	Trash Removal	6.644%	8	8	5	5	5	5	5	5	5	8	8	10	77
			74	69	78	128	164	96	136	145	156	99	93	116	1,356
General and Administrative															
8001-0000	Cleaning Supplies	6 644%	3	3	3	3	3	3	3	3	3	3	3	3	32
8005-00000	Smallwares / Tools	6 644%	4	4	4	4	4	4	4	4	4	4	4	4	53
8010-0000	Uniforms	6 644%	-	-	-	183	-	17	-	-	-	-	-	-	199
8015-0000	Office Supplies	6 644%	30	30	28	28	28	28	28	28	28	28	28	28	342
8018-0000	Safety Items	6.644%	3	21	3	3	3	3	3	3	3	3	3	3	58
8020-0000	Other Supplies	6.644%	3	3	5	3	3	5	3	3	5	3	3	5	43
8025-0000	Printing	6.644%	8	8	8	8	8	8	8	8	8	8	8	8	100
8030-0000	Computer Expense	6.644%	10	10	10	10	10	10	10	10	10	10	10	10	120
8035-0000	Postage & Delivery	6.644%	19	19	19	19	19	19	19	19	19	19	19	19	223
8040-0000	Telephone	6 840%	143	143	143	143	143	143	143	143	143	143	143	143	1,711
8045-0000	Mobile Phones / Pagers	6.644%	12	12	105	12	12	12	12	12	12	12	12	12	233
8050-0000	Travel	6 644%	3	3	3	3	3	3	3	3	3	3	3	3	32
8051-0000	Travel-Outlying	6.644%	-	-	-	-	-	-	-	-	-	-	-	-	-
8055-0000	Meals & Entertainment	6.644%	-	2	2	-	2	-	2	-	2	-	2	2	12
8060-0000	Refreshments	6.644%	5	5	5	5	5	5	5	5	5	5	5	5	60
8065-0000	Vehicle Expense	6.644%	53	7	7	7	7	7	7	53	7	7	7	7	173
8070-0000	Vehicle Fuel Expense	6 644%	40	40	40	40	66	47	60	60	86	66	40	40	625
8100-0000	Pest Control	6.644%	7	7	7	7	13	7	7	7	13	7	7	7	93
8110-0000	Landscaping		-	-	-	-	-	-	-	-	-	-	-	-	-
8120-0000	Equipment Lease/Payment	6.510%	111	111	121	111	111	121	111	111	121	111	111	121	1,370
8130-0000	Vehicle Lease/Payment	6.644%	-	-	-	-	-	-	74	74	74	74	74	74	446
8190-0000	Other Contract Services	6.644%	31	19	23	61	19	33	31	19	54	54	19	23	388
8200-0000	Dues & Subscriptions	6 644%	-	-	-	-	18	-	-	-	2	-	-	2	21
8210-0000	Training & Education	6 644%	27	4	4	4	4	4	4	4	4	4	4	4	74
8220-0000	Taxes & Licenses	6 644%	2	7	2	1	10	1	1	1	1	1	1	-	30
8230-0000	Property Taxes	6 644%	10	10	10	10	10	10	10	10	10	10	10	10	120
8250-0000	Professional Fees	6 644%	-	-	-	-	-	-	-	-	-	-	-	-	-
8260-0000	Insurance Expense	6 644%	96	96	96	96	96	96	96	96	96	96	96	96	1,149
8305-0000	Bank Charges	6 644%	10	10	10	28	28	28	18	18	18	30	30	30	259
8400-0000	R&M Building	6 644%	17	17	17	17	33	27	27	27	27	27	17	17	266
8410-0000	R&M Equipment	6 644%	3	3	7	13	13	13	13	13	13	10	3	3	110
8480-0000	Minor Improvements	6 644%	-	-	-	-	-	-	-	-	-	-	-	-	-
8700-0000	Activities Expense	6.644%	-	-	-	-	-	133	-	-	-	-	-	66	199
8710-0000	Advertising & Promotion	6.644%	-	-	-	-	-	-	-	-	-	-	-	-	-
			648	591	679	818	671	785	701	734	770	737	661	743	8,538
	Net Income before Non Cash		3,067	2,720	3,326	3,289	2,893	3,476	3,206	2,995	3,614	3,340	2,890	3,527	38,344

RESPONSIVE TO TCUC NO. 2-9

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	Double Diamond Utilities- The Cliffs Resort			**TCEQ Add. ID No. RN No (optional)**	WQ0002789000		
Investigation Type	CCI	**Contact Made In-House (Y/N)**		**Purpose of Investigation**	Mandatory Minor CCI		
Regulated Entity Contact	Josh Nolte			**Telephone No.**	940-779-2734	**Date Contacted**	6/12/2015
Title	Operator			**FAX #/Email address**	utilities@thecliffsresort.com	**FAX/Email date**	6/12/2015

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

Issue		**For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.**	
No.	**Type[1]**	**Rule Citation (if known)**	**Description of Issue**
1	AV	305.125(1); Monitoring and Reporting Requirements, No. 7.c	Failed to provide notification of any effluent violation which deviates from the permitted effluent limitation by more than 40%. Specifically, during the record review period of September 2012- April 2015, 6 violations which exceeded the permitted limit by more than 40% were noted. September 2012: Outfall 001A- TDS mg/L (Daily Average and Daily Max); October2012: Outfall 001A- TDS mg/L (Daily average and Daily Max), Outfall 201A TSS mg/L (daily average); December 2014: Outfall 201A TSS mg/L (daily average).
2	AV	305.125(5)	Failed to maintain the flow measuring device. Specifically, flow meter calibrations were not available after October 2013. Submit the meter calibrations or have the meter calibrated.
3	O		DMR data is still under review. If necessary, an additional exit interview will be provided.
4	RR	305.128(a)	An authorized signature is required on the discharge monitoring reports (DMRs). Please complete and submit a DMR Address and Signatory Authority Form to the Compliance Monitoring Team (MC 224) and the DFW Region Office.
5	O		A TCLP of the sewage sludge must be conducted prior to permit expiration on May 1, 2019.

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	**Yes**	**Ξ No**
Did the investigator advise the regulated entity representative that continued operation is not authorized?	**Yes**	**Ξ No**

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

Montana Bragg	6/12/2015	Josh Nolte	
Investigator Name (Signed &Printed)	**Date**	***Regulated Entity Representative Name (Signed & Printed)***	***Date***

If you have questions about any information on this form, please contact your local TCEQ Regional Office.
Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

From: Nunley, Buck
Sent: Monday, January 12, 2015 10:44 AM
To: Steve Zawrotny
Cc: Rotramel, Christie
Subject: RE: Compliance Documentation Needed
Attachments: Schedule.xlsx

Steve,

I will respond via email. If this is not sufficient, please let me know and I will compose a more formal correspondence.

Currently, the Cliffs Resort is operating on a "winter" schedule. Our demand for water is such that we are not required to operate on a 24/7 basis. Our peak summer months would be from May to September. During winter months, we operate the plant 5 to 7 days per week 7:30am to 5:00pm, as needed for demand. If an emergency situation requires continuous operation, one of three water plant employees will operate the plant for 8 hour shifts through the night. I have attached our "on-call" schedule showing operator's expected attendance and shift scheduling if needed. Peak months are highlighted. Please, let me know if any further information is required.

Thank you,

Buck Nunley
Regional Director of Utilities
Double Diamond Utilities
160 Cliffs Dr.
Graford TX 76449
940-779-2734 ofc
940-521-6268 cell
940-779-4560 fax
bnunley@thecliffsresort.com

From: Steve Zawrotny [Steve.Zawrotny@tceq.texas.gov]
Sent: Wednesday, January 07, 2015 12:05 PM
To: Nunley, Buck
Subject: Compliance Documentation Needed

Hi Buck,
Thank you for taking the time to speak with me while you are out of town. In regards to the outstanding alleged violation regarding continuous staffing/continual monitoring equipment:

Please send me a statement detailing:

1) Current hours of operation for the water plant
2) Current staffing schedules showing the plant is staffed during all hours of operation
3) A month-by-month breakdown of when the system is operating 24/7 and when the system is operating at reduced hours
4) Any other details you deem relevant in documenting the aforementioned information

An Additional Issue will be noted in the report for an inspector to verify, during the next inspection, that the required upgrades have been made to ensure the plant is either staffed or equipped with continuous monitoring equipment with plant shutdown and alarm capabilities at all times that it is in operation.

If you have any questions, please feel free to contact me.

Steve Zawrotny
Environmental Investigator
Public Water Supply
Texas Commission on Environmental Quality
Region 4, D/FW
2309 Gravel Drive
Ft. Worth, TX 76118-6951
steve.zawrotny@tceq.texas.gov
817-588-5859 Direct Line
817-588-5701 Fax

If you would like to comment on my customer service, you can use the following link:
http://www.tceq.texas.gov/customersurvey

Or you can contact my supervisor directly at:
jefftate@tceq.texas.gov

From: Nunley, Buck
Sent: Tuesday, January 20, 2015 2:33 PM
To: AmyJean.Katterjohn@tceq.texas.gov
Cc: Rotramel, Christie
Subject: WS ID 1820061 SWMOR for August 2014
Attachments: 1820061august2014corrected.pdf

Amy Jean,

After being notified of the alleged violation regarding the August 2014 SWMOR for WS 1820061, I reviewed the SWMOR retained copy of said month. I believe the SWMOR was submitted; however, the drop-down menu for the month selection was inadvertently set to 'JULY.' As you can see in the corrected copy I have attached, I signed the SWMOR in September. I initialed each page where the correction was made.

I assume the attached copy will be sufficient to correct the violation. Please, correct me if I am mistaken. I will compose a public notice, to be included with our next round of billing, notifying our customers of the error. If there is anything else required, please do not hesitate to contact me by phone or email.

Thank you,

Buck Nunley
Regional Director of Utilities
Double Diamond Resorts
160 Cliffs Dr.
Graford TX 76449
940-779-2734 ofc
940-521-6268 cell
940-779-4560 fax
bnunley@ddresorts.com

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 6, 2015

Mr. Josh Nolte, Operator
Double Diamond Utilities
160 Cliffs Drive
Graford, Texas 76449

RECD NOV 0 9 2015

Re: Notice of Compliance with Notice of Violation (NOV) dated *July 24, 2015:*
The Cliffs WWTP, 922 SH 16 S, Graford, Palo Pinto County
Regulated Entity: RN 102328515, TCEQ ID: WQ0002789000, EPA ID: TX0099015
Investigation No.1254598

Dear Mr. Nolte:

This letter is to inform you that the Texas Commission on Environmental Quality (TCEQ) Dallas-Fort Worth Regional Office has received adequate compliance documentation on November 5, 2015 to resolve the alleged violations documented during the investigation of the above-referenced regulated entity conducted on June 11, 2015. 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. Montana Bragg in the DFW Region-Stephenville Office at 254-965-9200.

Sincerely,

Jeff Tate, Water Section Manager
DFW Region Office

JT:mb

cc: Mr. Randy Gracy, 5495 Belt Line Road, Suite 200, Dallas, TX 75254

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 21, 2015

Mr. Randy Gracy, President
Double Diamond Utility
5495 Belt Line Rd., Ste. 200
Dallas, Texas 76245

Re: Notice of Compliance with Notice of Violation (NOV) dated July 10, 2014:
The Cliffs Resort Water System, 160 Cliffs Dr., Graford, Palo Pinto County, Texas
RN 101265213, PWS ID No. 1820061, Investigation No. 1170377

Dear Mr. Gracy:

This letter is to inform you that Texas Commission on Environmental Quality (TCEQ) Dallas/Fort Worth (D/FW) Regional Office has received adequate compliance documentation on October 7, 2014, and January 12, 2015, to resolve the alleged violations documented during the investigation of the above-referenced regulated entity conducted on May 21, 2014. Based on the information submitted, no further action is required concerning this investigation. However, please see the enclosed Additional Issue.

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 Mr. Steve Zawrotny at the D/FW Regional Office at (817) 588-5859.

Sincerely,

Charles Marshall
Team Leader, Public Water Supply Program
Texas Commission on Environmental Quality
D/FW Regional Office

CM/sz

cc: Buck Nunley, The Cliffs Resort, 160 Cliffs Dr., Graford, TX 76449

Enclosure: Summary of Investigation Findings ~~(w/o attachments)~~

Summary of Investigation Findings

CLIFFS THE

Investigation # 1216334
Investigation Date: 12/30/2014

, PALO PINTO COUNTY,

Additional ID(s): 1820061

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 539800
30 TAC Chapter 290.42(f)(1)(E)(ii)(II)

Alleged Violation:
Investigation: 1170377 Comment Date: 06/26/2014

290.42(f)(1)(E)(ii)(II) – Failure to have a containment area for the chemical storage facility. The containment area must be able to hold 110% of the total volume of the containers. No containment was provided for the chemical drum storage area.
Investigation: 1216334 Comment Date: 12/22/2014

Failure to provide spill containment in the chemical storage area.

30 TAC §290.42(f)(1)(E)(ii)(II) Common containment for multiple containers that are not interconnected must be large enough to hold the volume of the largest container with a minimum freeboard of six vertical inches or to hold 110% of the total volume of the container(s), whichever is less.

On the day of the investigation, May 21, 2014, the investigator observed there was no spill containment for the drums located in the chemical storage area. On October 7, 2014, The Cliffs Resort submitted compliance documentation, which included a photograph of a newly constructed spill containment area in the chemical storage area. This appears to resolve the alleged violation.

Recommended Corrective Action: Provide a containment area for the chemical storage area. Submit documentation to the Region 4 office by the compliance due date showing that the violation has been corrected.

Resolution: On October 7, 2014, The Cliffs Resort submitted compliance documentation, which included a photograph of a newly constructed spill containment area in the chemical storage area. This appears to resolve the alleged violation.

Track No: 539802
30 TAC Chapter 290.46(e)(6)(C)

Alleged Violation:
Investigation: 1170377 Comment Date: 06/30/2014

290.46(e)(6)(C) – Failure to provide continuous turbidity and disinfectant residual monitors with automatic plant shutdown and alarms to summon operators so as to ensure that the water produced continues to meet the commission's drinking water standards during periods when the plant is not staffed.

The system does not have at least one Class "C" or higher surface water operator on duty at the plant when it is in operation. The plant operates continually but is only staffed for eight to twelve hours a day. There are no automatic plant shutdown and alarms to summon operators.
Investigation: 1216334 Comment Date: 01/05/2015

Failure to provide staffing when the plant is in operation or provide continuous turbidity and disinfectant residual monitors with automatic plant shutdown and alarms to summon

operators.

30 TAC §290.46(e)(6)(C) Each surface water treatment plant must have at least one Class "C" or higher surface water operator on duty at the plant when it is in operation or the plant must be provided with continuous turbidity and disinfectant residual monitors with automatic plant shutdown and alarms to summon operators so as to ensure that the water produced continues to meet the commission's drinking water standards during periods when the plant is not staffed.

On the day of the investigation, it was observed that the surface water treatment plant (SWTP) operated continuously, but did not have continuous turbidity and disinfectant residual monitors with alarms and plant shutdown capabilities and a licensed operator was only present eight to twelve hours a day.

Recommended Corrective Action: Provide at least one Class "C" or higher surface water operator on duty at the plant when it is in operation or provide the plant with continuous turbidity and disinfectant residual monitors with automatic plant shutdown and alarms to summon operators so as to ensure that the water produced continues to meet the commission's drinking water standards during periods when the plant is not staffed.

Resolution: On January 12, 2015, The Cliffs Resort submitted a statement and a staffing schedule indicating that the water system is currently not operating around the clock and that water system personnel are staffed at all times the plant is in operation. It appears that the water system is compliant at this time and the alleged violation will be resolved.

ADDITIONAL ISSUES

Description	Additional Comments
Item 3	Please be aware that the surface water treatment plant must be staffed at all times it is in operation or it must have continuous turbidity and disinfectant residual monitors with alarms and plant shutdown capabilities at all times it is in operation. The status of these requirements will be reviewed during the next comprehensive compliance investigation and evaluated for compliance with applicable TCEQ regulations.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 24, 2015

CERTIFIED MAIL 7012 2210 0002 0781 2942
RETURN RECEIPT REQUESTED

RECD JUL 27 2015

Mr. Josh Nolte, Operator
Double Diamond Utilities
160 Cliffs Drive
Graford, Texas 76449

Re: Notice of Violation for Comprehensive Compliance Investigation at:
The Cliffs WWTP, 922 SH 16 S, Graford, Palo Pinto County
Regulated Entity: RN 102328515, TCEQ ID: WQ0002789000, EPA ID: TX0099015

Dear Mr. Nolte:

On June 11, 2015, Montana Bragg of the Texas Commission on Environmental Quality (TCEQ) Dallas-Fort Worth 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 **August 24, 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 DFW Region Office at 817-588-5800 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ appreciates your assistance in this matter. Self-reported effluent violations may be subject to formal enforcement, including penalties, upon review by the Enforcement Division. 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 documented in this notice. Should you choose to do so, you must notify the DFW Region Office within 10 days from the date of this letter. At that time, Jeff Tate, Water Section Manager 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. Montana Bragg in the DFW Region- Stephenville Office at 254-965-9200.

Sincerely,

Jeff Tate, Water Section Manager
DFW Region Office

JT:mb

Enclosure: Summary of Investigation Findings
Sample Results and COC
DMR Table

cc: Randy Gracy, President (w/ enclosures)
Double Diamond Utilities Co.
5495 Belt Line Road, Suite 200 Dallas, Texas 75234

Summary of Investigation Findings

DOUBLE DIAMOND DBA THE CLIFFS RESORT
160 CLIFFS DR
GRAFORD, PALO PINTO COUNTY, TX 76449

Investigation # 1254598
Investigation Date: 06/11/2015

Additional ID(s): WQ0002789000
TX0099015

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

Track No: 575197 **Compliance Due Date: 08/24/2015**
30 TAC Chapter 305.125(1)
PERMIT WQ0002789000, Page 6
Monitoring and Reporting Requirements, No. 7.c

Alleged Violation:
Investigation: 1254598 Comment Date: 07/07/2015

Failed to provide notification of any effluent violation which deviates from the permitted effluent limitation by more than 40%. Specifically, during the record review period of September 2012- April 2015, 6 violations which exceeded the permitted limit by more than 40% were noted. September 2012: Outfall 001A- TDS mg/L (Daily Average and Daily Max); October2012: Outfall 001A- TDS mg/L (Daily average and Daily Max), Outfall 201A TSS mg/L (daily average); December 2014: Outfall 201A TSS mg/L (daily average).

Recommended Corrective Action: Noncompliance notification shall be reported by the permittee in writing 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 effluent violations.

Track No: 577276 **Compliance Due Date: 08/24/2015**
30 TAC Chapter 305.128(a)

Alleged Violation:
Investigation: 1254598 Comment Date: 07/23/2015

Failed to provide an authorized signature on the discharge monitoring reports (DMRs). Specifically, the DMRs Signatory Authority Form was outdated as of May 2015, when the previous operator and DMR signatory was replaced with Mr. Notle. An authorized signature is required on the discharge monitoring reports (DMRs). A copy of the DMR Address and Signatory Authority Form was sent to the operator with the Exit Interview on June 12, 2015.

Recommended Corrective Action: DMRs shall be signed by a duly authorized representative. Please complete and submit a DMR Address and Signatory Authority Form to the Compliance Monitoring Team (MC 224) and the DFW Region Office.

Track No: 577277 **Compliance Due Date: 08/24/2015**
30 TAC Chapter 319.1

Alleged Violation:
Investigation: 1254598 Comment Date: 07/24/2015

Failed to accurately complete the discharge monitoring reports (DMRs). Specifically,

Outfall 001 Chloride Daily Maximum mg/L and Chloride Daily Average mg/L were reported incorrectly during the period of June 2014-May 2015;

Outfall 001 Total Dissolved Solids Daily Average mg/L was reported incorrectly during the months of March 2015 and May 2015;

Outfall 001 Total Dissolved Solids Daily Maximum mg/L was reported incorrectly during the months of June 2014-May 2015;

Outfall 301 Chloride Daily Maximum mg/L was reported incorrectly during the month of August 2014;

Outfall 301 Chloride Daily Average mg/L was reported incorrectly during the month of March 2015;

Outfall 301 Total Dissolved Solids Daily Average mg/L was reported incorrectly during the months of August 2014, March 2015 and May 2015;

Outfall 301 Total Dissolved Solids Daily Maximum mg/L was reported incorrectly during the month of March 2015 and May 2015;

Outfall 101 TDS Daily Average mg/L and Daily Maximum mg/L was reported incorrectly during the month of May 2015.

See the attached table.

Recommended Corrective Action: All effluent data must be accurately reported on all DMRs. Correct and resubmit the DMRs for the period of June 2014 to July 2015 to the DFW Region Office and the Enforcement Division (MC 224).

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

Track No: 575296

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)

PERMIT WQ0002789000, Permit Conditions, No. 2.g

Alleged Violation:

Investigation: 1254598 Comment Date: 07/22/2015

Failed to prevent the unauthorized discharge of wastewater. Specifically, during the 18 months preceding the investigation, 1 unauthorized discharge was reported. This discharge occurred August 20, 2013 and was a 50 gallon discharge from the collection system.

Resolution: Compliance has been maintained since September 2013.

ADDITIONAL ISSUES

Description	Additional Comments
Is sludge analysis conducted for all the required parameters?	A TCLP of the sewage sludge must be conducted prior to permit expiration on May 1, 2019.
Are the annual sludge reports submitted, as required by the permit?	The Annual Sludge Report is due in the DFW Region Office and the Water Quality Compliance Monitoring Team by September 1 of each year.

Were the required records maintained and available for review during the investigation?	The flow meter calibrations were not available after October 2013. Documentation of the calibrations occurring on April 24, 2014 and February 6, 2015 were received in the Region office on June 16, 2015.

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Double Diamond Utilities- The Cliffs Resort WWTP

Authorization ID(s): WQ0002789000, TX0099015

Date of Investigation: June 11, 2015

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater
Outfall 001					**Previously monitored effluent from Outfall 101 and 201**
Flow, MG	0.0748		Total daily flow		
BOD5 (mg/l)	3	65	Grab	W001786-01	
TSS (mg/l)	15	65	Grab	W001786-01	
TDS (mg/l)	2010 (Reportable increase: 570)*	3000*	Grab	W001786-01	
Chloride (mg/l)	853 (Reportable increase: 217)*	NA*	Grab	W001786-01	
pH (SU)	7.33	6.0-9.0	Grab		
Outfall 101					**Reverse osmosis reject water**
Flow, MG	0.0748		Total daily flow		
TDS (mg/l)	4060	13,100	Grab	W001786-02	
Outfall 201					**Domestic**
Flow, MGD	No Discharge	-	-		
TSS (mg/l)	No Discharge	45	Grab		
BOD5 (mg/l)	No Discharge	45	Grab		
E. coli	No Discharge	NA	Grab		
Chlorine (mg/l)	No Discharge	1.0-4.0	Grab		
pH (SU)	No Discharge	6.0-9.0	Grab		
Outfall 301					**Influent from Possum Kingdom Lake**
TDS (mg/l)	1440	NA	Grab	W001786-03	
Chloride (mg/l)	636	NA	Grab	W001786-03	

*increase over lake feed to water treatment plant monitored at Outfall 301.

AA65613 AA65615 W 001786

Chain of Custody Record

Send to: ☒ Houston Laboratory Phone: 281-457-5229 ☐

TCEQ

Region: 04 Organization #: 96104 PCA Code: 96308 Program: Water Quality

Sampler Name (print): Montana Bragg Sampler Signature: Montana Bragg

Sampler phone number: 254-765-4200 E-Mail ID: Montana.Bragg@TCEQ.Texas.gov

LAB USE ONLY	Sample ID	Sampling Date	Sampling Time	Comp	Grab	Matrix (L = Liquid, S = Solid)	No. of Containers	Analyses Requested	BOD	CBOD	TSS	NH_3-N	E. Coli	TDS	Chloride				Remarks
								Containers*	1		1			1	1				
								Preservatives**	P		P			P	P				
AA65613	-01	6/11/15	10:37		✓	L	1		X		X			X	X				Non potable -001
AA65614	-02	6/11/15	10:30		✓	L	1							X					Non potable 101
AA65615	-03	6/11/15	10:31		✓	L	1							X	X				Non potable 301
	-04																		
	-05																		
	-06																		
	-07																		
	-08																		

RECEIVED JUL 23 2015 TCEQ REGION 4 - STE

RELINQUISHED BY	DATE	TIME	RECEIVED BY	DATE	TIME
Montana Bragg	6/11/15	14:00	Fedex	6/11/15	~~14:00~~ fedx
			[signature]	6/12/15	0915

FOR LAB USE ONLY
Received on Ice: Y N
Temperature: °C
Preserved: Y N
COC Seal: Y N
Seals Intact: Y N

Shipper Name: Fed ex Shipper Number: 8003 4574 0498

*Containers: P = Plastic G = Clear Glass A = Amber Glass V = VOA Vials O = Other

**Preservatives: 1 = Ice 2 = H_2SO_4 3 = HCl 4 = HNO_3 5 = Na 6 = Other

TCEQ-20846 (Rev. 8/13) White (Original) - Lab Yellow - Lab Pink - Collector Copy

5144 East Sam Houston Parkway North
Houston, Texas 77015
Phone: (281) 457-5229
Fax: (281) 457-9107
Contact:
Jesus Salas - Work Leader
Rajan Geevarghese - Work Leader

7/23/2015 8:47:49AM

Hi Montana,

The sample results for COC # **W001786-01**, Sample # **AA65613** are attached to this email within this PDF document.

The Staff of the TCEQ Houston Laboratory appreciates your business and continued support.

A copy of the Chain of Custody will be sent in a separate email.

Please contact us at (281) 457-5229 if you are in need of assistance.

Thank you,

Texas Commission on Environmental Quality
Houston Laboratory
5144 East Sam Houston Parkway North
Houston, Texas 77015
(281) 457-5229 (Main)
(281) 457-9107 (Fax)

5144 East Sam Houston Parkway North
Houston, Texas 77015
Phone: (281) 457-5229
Fax: (281) 457-9107
Contact:
Jesus Salas - Work Leader
Rajan Geevarghese - Work Leader

TCEQ Laboratory
Report of Analysis

7/23/2015 8:47:49AM

TCEQ Sample #:	AA65613	**Chain of Custody #:**	W001786-01	**Region:**	4
Program:	Water Quality Monitoring			**Organization #:**	06104
Sample Collected:	06/11/2015 10:37	**Sample Matrix:**	LIQUID	**Work #:**	96308
Sample Received:	06/12/2015	**Collected By:**	montana.bragg@tceq.texas.gov	**Permit #:**	

Sample Depth:	**CL2R:**	**Field pH:**	**Conductivity:**

Collection Site: –GRAB

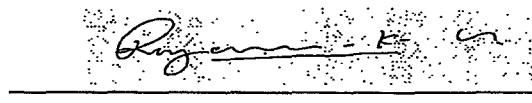
CONSTITUENT	RESULT	QUAL	UNIT	ANALYSIS DATE	METHOD
BOD, 5-Day	3		mg/L	06/12/2015 10:55	SM 5210 B-2001
Chloride	853		mg/L	06/19/2015 15:03	EPA 300.0 R2.1
Total Dissolved Solids	2010		mg/L	06/18/2015 08:55	SM 2540 C-1997
Total Suspended Solids	15		mg/L	06/12/2015 14:00	SM 2540-D-1997
Volatile Suspended Solids	<5		mg/L	06/12/2015 14:00	SM 2540-E-1997

Analysis Comments:

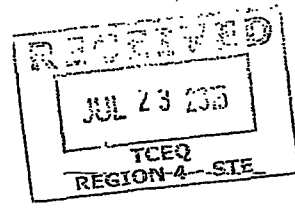
Method: BOD52

Note Text: One or more dilution water blanks exhibited a dissolved oxygen uptake of >0.2 mg/L, suggesting the reported result may be biased high.

End of Report for TCEQ Sample Number: AA65613

Laboratory Approval:  Jul 23, 2015

This report contains results generated by the TCEQ Houston Laboratory. All solid results are calculated on a dry weight basis. The results reported meet the requirements of the current NELAP Standard.



Please fill out our customer feedback form at the following web address:

http://home.tceq.state.tx.us/internal/water/water_quality_planning/lab/index.shtml

5144 East Sam Houston Parkway North
Houston, Texas 77015
Phone: (281) 457-5229
Fax: (281) 457-9107
Contact:
Jesus Salas - Work Leader
Rajan Geevarghese - Work Leader

7/7/2015 8:49:30AM

Hi Montana,

The sample results for COC # **W001786-02**, Sample # **AA65614** are attached to this email within this PDF document.

The Staff of the TCEQ Houston Laboratory appreciates your business and continued support.

A copy of the Chain of Custody will be sent in a separate email.

Please contact us at (281) 457-5229 if you are in need of assistance.

Thank you,

Texas Commission on Environmental Quality
Houston Laboratory
5144 East Sam Houston Parkway North
Houston, Texas 77015
(281) 457-5229 (Main)
(281) 457-9107 (Fax)

5144 East Sam Houston Parkway North
Houston, Texas 77015
Phone: (281) 457-5229
Fax: (281) 457-9107
Contact:
Jesus Salas - Work Leader
Rajan Geevarghese - Work Leader

TCEQ Laboratory Report of Analysis

7/7/2015 8:49:30AM

TCEQ Sample #:	AA65614	**Chain of Custody #:**	W001786-02	**Region:**	4
Program:	Water Quality Monitoring			**Organization #:**	06104
Sample Collected:	06/11/2015 10:30	**Sample Matrix:**	LIQUID	**Work #:**	96308
Sample Received:	06/12/2015	**Collected By:**	montana.bragg@tceq.texas.gov	**Permit #:**	
Sample Depth:		**CL2R:**		**Field pH:**	**Conductivity:**
Collection Site:	--GRAB				

CONSTITUENT	RESULT	QUAL	UNIT	ANALYSIS DATE	METHOD
Total Dissolved Solids	4060		mg/L	06/18/2015 08:55	SM 2540 C-1997

End of Report for TCEQ Sample Number: AA65614

Laboratory Approval: Jul 07, 2015

This report contains results generated by the TCEQ Houston Laboratory. All solid results are calculated on a dry weight basis. The results reported meet the requirements of the current NELAP Standard.

Please fill out our customer feedback form at the following web address:

http://home.tceq.state.tx.us/internal/water/water_quality_planning/lab/index.shtml

5144 East Sam Houston Parkway North
Houston, Texas 77015
Phone: (281) 457-5229
Fax: (281) 457-9107
Contact:
Jesus Salas - Work Leader
Rajan Geevarghese - Work Leader

7/15/2015 9:31:00AM

Hi Montana,

The sample results for COC # **W001786-03,** Sample # **AA65615** are attached to this email within this PDF document.

The Staff of the TCEQ Houston Laboratory appreciates your business and continued support.

A copy of the Chain of Custody will be sent in a separate email.

Please contact us at (281) 457-5229 if you are in need of assistance.

Thank you,

Texas Commission on Environmental Quality
Houston Laboratory
5144 East Sam Houston Parkway North
Houston, Texas 77015
(281) 457-5229 (Main)
(281) 457-9107 (Fax)

5144 East Sam Houston Parkway North
Houston, Texas 77015
Phone: (281) 457-5229
Fax: (281) 457-9107
Contact:
Jesus Salas - Work Leader
Rajan Geevarghese - Work Leader

TCEQ Laboratory
Report of Analysis

7/15/2015 9:31:00AM

TCEQ Sample #:	AA65615	**Chain of Custody #:**	W001786-03	**Region:**	4
Program:	Water Quality Monitoring			**Organization #:**	06104
Sample Collected:	06/11/2015 10:31	**Sample Matrix:**	LIQUID	**Work #:**	96308
Sample Received:	06/12/2015	**Collected By:**	montana.bragg@tceq.texas.gov	**Permit #:**	

Sample Depth:	**CL2R:**	**Field pH:**	**Conductivity:**

Collection Site: –GRAB

CONSTITUENT	RESULT	QUAL	UNIT	ANALYSIS DATE	METHOD
Chloride	636		mg/L	06/19/2015 15:46	EPA 300.0 R2.1
Total Dissolved Solids	1440		mg/L	06/18/2015 08:55	SM 2540 C-1997

End of Report for TCEQ Sample Number: AA65615

Laboratory Approval: Jul 15, 2015

This report contains results generated by the TCEQ Houston Laboratory. All solid results are calculated on a dry weight basis. The results reported meet the requirements of the current NELAP Standard.

Please fill out our customer feedback form at the following web address:

http://home.tceq.state.tx.us/internal/water/water_quality_planning/lab/index.shtml

June 2014 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	2120	1300	820	4504	2508	1996
	2	2100	1320	780	4156	2540	1616
	3	2000	1290	710	3940	2696	1244
	4	2175	1155	1020	4680	2240	2440
average		2098.75	1266.25	832.5	4320	2496	1824

July 2014 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	2000	1250	750	4021	2434	1587
	2	2200	1130	1070	4228	2508	1720
	3	1900	1360	540	3840	1839	2001
	4	2120	1280	840	4096	2304	1792
	5	2140	1300	840	4696	2496	2200
average		2072	1264	808	4176.2	2316.2	1860

August 2014 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	1810	2780	-970	3632	2780	852
	2	1960	2424	-464	3732	2424	1308
	3	2100	2616	-516	4240	2616	1624
	4	2300	2696	-396	4764	2696	2068
average		2042.5	2629	-586.5	4092	2629	1463

September 2014 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	2420	1420	1000	3012	2764	248
	2	2410	1400	1010	4924	2708	2216
	3	2520	1390	1130	5096	2872	2224
	4	2680	1400	1280	5240	2468	2772
	5	2100	1390	710	4516	2748	1768
average		2426	1400	1026	4557.6	2712	1845.6

October 2014 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	1200	1400	-200	2268	2840	-572
	2	2040	1380	660	4044	2598	1446
	3	2500	1400	1100	2500	2884	-384
	4	2900	1390	1510	2900	2644	256
average		2160	1392.5	767.5	2928	2741.5	186.5

November 2014 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	1700	1400	300	3218	2684	534
	2	1740	1340	400	3104	2500	604
	3	1440	1300	140	2624	2592	32
	4	1800	1400	400	3304	2624	680
average		1670	1360	310	3062.5	2600	462.5

Legend

Daily Avg

Daily max

Violation

To be corrected in DMR

December 2014 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	2100	1350	750	4240	2676	1564
	2	1620	1400	220	3188	2732	456
	3	2040	1410	630	4428	2990	1438
	4	1390	2120	-730	4488	2644	1844
	5	1980	1400	580	3848	2696	1152
average		1826	1536	290	4038.4	2747.6	1290.8

January 2015 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	2100	1430	670	2184	2884	-700
	2	2300	1490	810	2196	2716	-520
	3	2400	1410	990	4452	2984	1468
	4	2100	1480	620	3936	3084	852
average		2225	1452.5	772.5	3192	2917	275

February 2015 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	1620	1440	180	3024	2990	34
	2	1900	1490	410	3920	3196	724
	3	2670	1500	1170	5228	2890	2338
	4	6648	1520	5128	3250	2626	624
average		3209.5	1487.5	1722	3855.5	2925.5	930

March 2015 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	1890	1500	390	3780	2790	990
	2	2100	1500	600	5040	3788	1252
	3	2050	1490	560	4316	3004	1312
	4	1710	1900	-190	3420	3084	336
average		1937.5	1597.5	340	4139	3166.5	972.5

April 2015 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	1520	2850	-1330	5648	2916	2732
	2	2790	1480	1310	5436	2968	2468
	3	1600	1460	140	2490	2940	-450
	4	2420	1500	920	6304	5264	1040
average		2082.5	1822.5	260	4969.5	3522	1447.5

May 2015 Samples		Chloride Samples at 001	Chloride Samples at 301	Chloride increase to report for 001	TDS Samples at 001	TDS Samples at 301	TDS increase to report for 001
	1	1500	1440	60	3092	2976	116
	2	1710	1490	220	3552	2864	688
	3	1160	1450	-290	2212	2928	-716
	4	1420	1390	30	6432	2696	3736
average		1447.5	1442.5	5	3822	2866	956

Legend

Daily Avg

Daily max

Violation

To be corrected in DMR

SURFACE WATER MONTHLY OPERATING REPORT

FOR PUBLIC WATER SYSTEMS THAT ARE USING SURFACE WATER SOURCES
OR GROUND WATER SOURCES UNDER THE INFLUENCE OF SURFACE WATER

Summary Page

PUBLIC WATER SYSTEM NAME: The Cliffs Resort

PLANT NAME OR NUMBER: 1820061

PWS ID No.: 1820061

I certify that I am familiar with the information contained in this report and that, to the best of my knowledge, the information is true, complete, and accurate

Operator's Signature:

Report for the Month of: ~~July 2014~~ August 2014

Certificate No. & Grade: WS0011620, B

Date: September 8, 2014

TREATMENT PLANT PERFORMANCE

Total number of turbidity readings:	31	Number of 4-hour periods when plant was off-line:	0
Number of readings above 0.10 NTU:	0	Number of 4-hour periods when plant was on-line	
Number of readings above 0.3 NTU:	0	but turbidity data was not collected:	0
Number of readings above 0.5 NTU:	0	Number of days when plant was on-line	
Number of readings above 1.0 NTU:	0	but individual filter turbidity data was not collected:	0
Maximum allowable turbidity level:	0.3	Number of days with readings above 1.0 NTU:	0 (2)
Percentage of readings above this limit:	0.0 % (1)	Number of days with readings above 5.0 NTU:	0 (3)

Statistical Summary				
	Maximum turbidity reading:	0.05 NTU	Average turbidity value:	0.05 NTU
	Minimum turbidity reading:	0.04 NTU	Standard deviation:	0.005 NTU
	CFE 95th percentile value:	0.05 NTU	IFE 95th percentile:	0.960 NTU

Number of days with a low CT for no more than 4.0 consecutive hours:	0	Average log inactivation for Giardia:	5.33
		Average log inactivation for viruses:	146.62
Number of days with a low CT for more than 4.0 consecutive hours:	0 (4)	Number of days when profiling data was not collected:	0
		Number of days when CT data was not collected:	0

Minimum disinfectant residual required leaving the plant: 0.2 mg/L, measured as Free Chlorine

Number of days with a low residual for no more than 4.0 consecutive hours:	0		
Number of days with a low residual for more than 4.0 consecutive hours:	0 (5)	Number of days when disinfectant residual leaving the plant was not properly monitored:	0

DISTRIBUTION SYSTEM

Minimum disinfectant residual required in distribution system: 0.2 mg/L, measured as Free Chlorine

Total number of readings this month:	31 (at least 31 required) (8)		
Average disinfectant residual value:	0.84	Percentage of readings with a low residual this month:	0.0 % (6A)
Number of readings with a low residual:	0		
Number of readings with no detectable residual:	0	Percentage of readings with a low residual last month:	0.0 % (6B)

ADDITIONAL REPORTS & WORKSHEETS

The Page 1 Addendum (Public Notices) is not required because there were no treatment technique or monitoring/reporting violations reported.

Additional report(s) for individual filter monitoring required: ◉ NONE ○ Filter Profile ○ Filter Assessment ○ CPE

Additional report(s) for individual filter monitoring submitted: ◉ NONE ○ Filter Profile (9) ○ Filter Assessment (10) ○ CPE (11)

No additional IFE Reports are required this month.

One or more additional reports have been waived due to an approved Corrective Action Plan.

SURFACE WATER MONTHLY OPERATING REPORT
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
WATER SUPPLY DIVISION/PUBLIC DRINKING WATER SECTION (MC-155)
P.O. BOX 13087, AUSTIN, TEXAS 78711-3087

SURFACE WATER MONTHLY OPERATING REPORT

FOR PUBLIC WATER SYSTEMS THAT ARE USING SURFACE WATER SOURCES
OR GROUND WATER SOURCES UNDER THE INFLUENCE OF SURFACE WATER (cont.)

Turbidity Data Page

PUBLIC WATER SYSTEM NAME: The Cliffs Resort

PLANT NAME OR NUMBER: 1820061

PWS ID No.: 1820061

Connections: 273

Month: ~~July~~ August

Year: 2014

Population: 64

PERFORMANCE DATA

Date	Raw Water Pumpage (MGD)	Treated Water Pumpage (MGD)	RAW WATER ANALYSES NTU	RAW WATER ANALYSES Alk.	SETTLED WATER TURBIDITY (Optional Data) Basin No. 1	2	3	4	5	6	FINISHED WATER QUALITY Turbidity NTU1	NTU2	NTU3	NTU4	NTU5	NTU6	Lowest Residual	Time
1	0.396	0.261	1	92							0.04						0.5	
2	0.465	0.276	1	98							0.04						0.6	
3	0.373	0.229	1	104							0.04						0.7	
4	0.356	0.214	1	103							0.04						1.0	
5	0.358	0.224	2	107							0.04						1.2	
6	0.383	0.247	2	104							0.04						0.7	
7	0.383	0.245	2	113							0.04						0.8	
8	0.376	0.242	2	90							0.04						1.1	
9	0.368	0.236	3	90							0.04						1.0	
10	0.382	0.239	2	90							0.05						1.0	
11	0.354	0.222	2	93							0.05						1.1	
12	0.362	0.224	2	92							0.05						1.1	
13	0.356	0.173	2	95							0.05						0.8	
14	0.270	0.210	2	97							0.05						1.2	
15	0.328	0.200	2	100							0.05						1.3	
16	0.299	0.177	3	105							0.05						1.3	
17	0.250	0.147	3	190							0.05						1.6	
18	0.316	0.199	2	150							0.05						1.0	
19	0.354	0.214	2	93							0.05						0.5	
20	0.338	0.209	2	94							0.05						0.9	
21	0.368	0.221	2	95							0.05						0.4	
22	0.278	0.170	3	96							0.05						0.6	
23	0.376	0.235	3	99							0.05						0.4	
24	0.377	0.232	3	91							0.05						0.6	
25	0.343	0.207	2	97							0.05						0.8	
26	0.315	0.192	3	99							0.05						0.8	
27	0.346	0.200	3	91							0.05						0.7	
28	0.349	0.199	2	97							0.05						0.8	
29	0.339	0.203	3	99							0.04						0.7	
30	0.274	0.166	3	97							0.04						0.6	
31	0.342	0.207	2	95							0.04						0.3	
Total	10.772	6.619																
Avg	0.347	0.214																
Max	0.465	0.276																
Min	0.250	0.147																

NOTE: ONLY use the "Time" column to show the length of time that the disinfectant residual entering the distribution system fell below the acceptable level.

SUBMITTED BY: [signature]

Certificate No. and Grade: WS0011620, B

Date: September 8, 2014

SURFACE WATER MONTHLY OPERATING REPORT

FOR PUBLIC WATER SYSTEMS THAT ARE USING SURFACE WATER SOURCES
OR GROUND WATER SOURCES UNDER THE INFLUENCE OF SURFACE WATER (cont.)
Filter Data Page

PUBLIC WATER SYSTEM NAME: The Cliffs Resort
PLANT NAME OR NUMBER: 1820061
PWS ID No.: 1820061
Month: ~~July~~ August Year: 2014

PERFORMANCE DATA

INDIVIDUAL FILTER TURBIDITY

Date	Filter No. 1		Filter No. 2		Filter No. 3		Filter No. 4		Filter No. 5		Filter No. 6		Filter No. 7		Filter No. 8		Filter No. 9		Filter No. 10	
	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs	Max	4 Hrs
1	0.67																			
2	0.77																			
3	0.67																			
4	0.61																			
5	0.71																			
6	0.74																			
7	0.61																			
8	0 60																			
9	0.62																			
10	0 69																			
11	0 61																			
12	0.79																			
13	0.89																			
14	0 98																			
15	0.44																			
16	0.49																			
17	0.70																			
18	0 60																			
19	0.67																			
20	0.88																			
21	0 89																			
22	0.74																			
23	0.66																			
24	0 77																			
25	0.89																			
26	0.64																			
27	0 94																			
28	0 99																			
29	0.67																			
30	0.64																			
31	0.77																			

SUMMARY & COMPLIANCE ACTIONS

Criteria	Filter No. 1	2	3	4	5	6	7	8	9	10	Plant
Number of days with event(s) above 0.5 NTU at 4.0 hrs this month											
Number of days with event(s) above 1.0 NTU this month	0										
Number of days with event(s) above 1.0 NTU last month	2										
Number of days with event(s) above 1.0 NTU two months ago	7										
Total number of days with event(s) above 1.0 NTU in three months	9										
Number of days with event(s) above 2.0 NTU this month											0
Number of days with event(s) above 2.0 NTU last month											0
Does the filter/plant have an approved Corrective Action Plan?	Y										Y
Is the plant required to submit a Filter Profile Report?	N										
Is the plant required to submit a Filter Assessment Report?	N										
Is the plant required to submit a Request for Compliance CPE?											N

SUBMITTED BY: [signature]
Certificate No. and Grade: WS0011620, B
Date: September 8, 2014

SURFACE WATER MONTHLY OPERATING REPORT

FOR PUBLIC WATER SYSTEMS THAT ARE USING SURFACE WATER SOURCES
OR GROUND WATER SOURCES UNDER THE INFLUENCE OF SURFACE WATER (cont.)
Disinfection Data Page

PUBLIC WATER SYSTEM NAME: The Cliffs Resort
PLANT NAME OR NUMBER: 1820061
PWS ID No.: 1820061
Month: ~~July~~ August Year: 2014

DISINFECTION PROCESS PARAMETERS

APPROVED CT STUDY PARAMETERS						PERFORMANCE STANDARDS	
	Disinfection Zones					Log Inactivations	
Parameters	D1	D2	D3	D4	D5	Giardia lamblia Cysts	Viruses
Flow Rate (MGD)	0.173					0.0	4.0
T_{10} (minutes)	83.0						

PERFORMANCE DATA

DISINFECTION PROCESS DATA

Date	Disinfectant	C (mg/L)	Flow (MGD)	Temp (°C)	pH	Giardia Log	Virus Log	Inact. Ratio	Time=
1	FCL D1	0.5	0.261	26.1	7.2				
	D2								
	D3					2.21	58.28	14.57	
	D4							(V)	
	D5								
2	FCL D1	0.6	0.276	27.1	7.4				
	D2								
	D3					2.60	74.31	18.58	
	D4							(V)	
	D5								
3	FCL D1	0.7	0.229	26.9	7.4				
	D2								
	D3					3.84	107.62	26.91	
	D4							(V)	
	D5								
4	FCL D1	1.0	0.214	27.1	7.4				
	D2								
	D3					5.46	165.34	41.33	
	D4							(V)	
	D5								
5	FCL D1	1.2	0.224	27.0	7.6				
	D2								
	D3					5.80	191.31	47.83	
	D4							(V)	
	D5								
6	FCL D1	0.7	0.247	27.2	7.5				
	D2								
	D3					3.13	93.47	23.37	
	D4							(V)	
	D5								
7	FCL D1	0.8	0.245	27.3	7.5				
	D2								
	D3					3.79	113.76	28.44	
	D4							(V)	
	D5								
8	FCL D1	1.1	0.242	27.8	7.1				
	D2								
	D3					6.03	164.11	41.03	
	D4							(V)	
	D5								

PERFORMANCE DATA

DISINFECTION PROCESS DATA

Date	Disinfectant	C (mg/L)	Flow (MGD)	Temp (°C)	pH	Giardia Log	Virus Log	Inact. Ratio	Time=
9	FCL D1	1.0	0.236	27.1	7.0				
	D2								
	D3					5.92	151.93	37.98	
	D4							(V)	
	D5								
10	FCL D1	1.0	0.239	27.1	7.0				
	D2								
	D3					5.83	149.58	37.40	
	D4							(V)	
	D5								
11	FCL D1	1.1	0.222	27.2	7.0				
	D2								
	D3					6.77	174.58	43.65	
	D4							(V)	
	D5								
12	FCL D1	1.1	0.224	26.6	7.0				
	D2								
	D3					6.21	164.70	41.18	
	D4							(V)	
	D5								
13	FCL D1	0.8	0.173	26.7	7.0				
	D2								
	D3					5.73	146.39	36.60	
	D4							(V)	
	D5								
14	FCL D1	1.2	0.210	26.7	7.0				
	D2								
	D3					7.44	194.68	48.67	
	D4							(V)	
	D5								
15	FCL D1	1.3	0.200	27.4	7.0				
	D2								
	D3					8.81	235.98	58.99	
	D4							(V)	
	D5								
16	FCL D1	1.3	0.177	26.4	7.0				
	D2								
	D3					10.02	268.30	67.08	
	D4							(V)	
	D5								

NOTE: = ONLY use the "Time=" column to show the length of time that the total inactivation ratio was less than 1.00.

SUBMITTED BY: [signature] Certificate No. and Grade: WS0011620, B Date: September 8, 2014

SURFACE WATER MONTHLY OPERATING REPORT

FOR PUBLIC WATER SYSTEMS THAT ARE USING SURFACE WATER SOURCES
OR GROUND WATER SOURCES UNDER THE INFLUENCE OF SURFACE WATER (cont.)
Disinfection Data Page (cont.)

PUBLIC WATER SYSTEM NAME: The Cliffs Resort
PLANT NAME OR NUMBER: 1820061
PWS ID No.: 1820061
Month: July August
Year: 2014

DISINFECTION PROCESS PARAMETERS

APPROVED CT STUDY PARAMETERS						PERFORMANCE STANDARDS	
	Disinfection Zones					Log Inactivations	
Parameters	D1	D2	D3	D4	D5	Giardia lamblia Cysts	Virus
Flow Rate (MGD)	0.173					0.0	4.0
T_{10} (minutes)	83.0						

PERFORMANCE DATA

DISINFECTION PROCESS DATA

Date	Disinfectant	C (mg/L)	Flow (MGD)	Temp (°C)	pH	Giardia Log	Virus Log	Inact. Ratio	Time■
17	FCL D1	1.6	0.147	27.9	7.6				
	D2								
	D3					11.92	409.65	102.41	
	D4							(V)	
	D5								
18	FCL D1	1.0	0.199	28.1	7.2				
	D2								
	D3					6.56	181.93	45.48	
	D4							(V)	
	D5								
19	FCL D1	0.5	0.214	28.1	7.2				
	D2								
	D3					2.72	72.53	18.13	
	D4							(V)	
	D5								
20	FCL D1	0.9	0.209	27.2	7.3				
	D2								
	D3					5.24	152.59	38.15	
	D4							(V)	
	D5								
21	FCL D1	0.4	0.221	28.2	7.3				
	D2								
	D3					2.43	64.98	16.24	
	D4							(V)	
	D5								
22	FCL D1	0.6	0.170	28.7	7.0				
	D2								
	D3					5.12	127.70	31.93	
	D4							(V)	
	D5								
23	FCL D1	0.4	0.235	27.7	6.9				
	D2								
	D3					2.48	57.11	14.26	
	D4							(V)	
	D5								
24	FCL D1	0.6	0.232	28.5	6.9				
	D2								
	D3					3.60	90.78	22.70	
	D4							(V)	
	D5								

PERFORMANCE DATA

DISINFECTION PROCESS DATA

Date	Disinfectant	C (mg/L)	Flow (MGD)	Temp (°C)	pH	Giardia Log	Virus Log	Inact. Ratio	Time■
25	FCL D1	0.8	0.207	29.1	6.9				
	D2								
	D3					6.12	151.99	38.00	
	D4							(V)	
	D5								
26	FCL D1	0.8	0.192	29.2	7.0				
	D2								
	D3					6.24	156.63	39.16	
	D4							(V)	
	D5								
27	FCL D1	0.7	0.200	29.4	7.3				
	D2								
	D3					4.81	136.35	34.09	
	D4							(V)	
	D5								
28	FCL D1	0.8	0.199	29.7	7.5				
	D2								
	D3					5.33	161.28	40.32	
	D4							(V)	
	D5								
29	FCL D1	0.7	0.203	28.9	7.3				
	D2								
	D3					5.09	143.67	35.92	
	D4							(V)	
	D5								
30	FCL D1	0.6	0.166	27.8	6.8				
	D2								
	D3					6.12	140.84	35.21	
	D4							(V)	
	D5								
31	FCL D1	0.3	0.207	27.4	6.7				
	D2								
	D3					1.99	42.81	10.70	
	D4							(V)	
	D5								
					Max	11.92	409.65		
					Min	1.99	42.81		
					Avg	5.33	146.62		
					SD	2.23	70.19		

NOTE: ■ ONLY use the "Time■" column to show the length of time that the total inactivation ratio was less than 1.00.

SUBMITTED BY: Brad Hardy
Certificate No and Grade: WS0011620, B
Date: September 8, 2014

PWS_1820061_CO_20151118_NOV PBCU

Texas Commission on Environmental Quality

Protecting Texas by Reducing and Preventing Pollution

November 18, 2015

REC'D NOV 3 0 2015

RANDY GRACY, PRESIDENT
CLIFFS THE
5495 BELT LINE RD STE 200
DALLAS, TX 75254-7658

Subject: **NOTICE OF LEAD AND COPPER RULE MONITORING & REPORTING VIOLATION**
CLIFFS THE - PWS ID No. 1820061
PALO PINTO COUNTY, TEXAS

Attention: Public Water System Owner / Official / Manager

The Texas Commission on Environmental Quality (TCEQ) requires Community and Non Transient Non Community public water systems (PWS) to monitor for lead and copper samples in accordance with Title 30 Texas Administrative Code (30 TAC), Chapter 290, Section 290.117. In addition, the PWS is required to report any sample results in accordance with 30 TAC §290.117(i). Based on our most recent records, the PWS has a Monitoring & Reporting violation(s) for the following periods:

[January 1 – December 31, 2015]

The PWS is required to issue public notification to customers for Monitoring & Reporting violations as soon as the violation has been identified in accordance with 30 TAC §290.122(c). Enclosed is the mandatory language required for the public notice of the violations.

The PWS is required to submit to the TCEQ a copy of the public notice that was issued within ten days of its distribution, along with a completed Certification of Delivery for Public Notice form (enclosed) as proof of public notification. Failure to properly notify the TCEQ and your customers will result in an additional violation for your PWS. Drinking water violations can result in an enforcement action against your PWS.

To view your water system information and public notice schedule, please visit our Drinking Water Watch website at the following link: *http://dww2.tceq.texas.gov/DWW/*.

If you have questions about your Monitoring & Reporting lead/copper violations please contact Laurie Gehlsen at Laurie.Gehlsen@tceq.texas.gov or by telephone at (512) 239-4660.

Should you have questions concerning public notification requirements, please contact our Public Notice Rule Coordinator PWSPN@tceq.texas.gov or by telephone at (512) 239-5723.

Sincerely,

Gary Chauvin, Manager
Public Drinking Water Section (MC-155)
Water Supply Division
Texas Commission on Environmental Quality

Enclosures: Mandatory Public Notice Language
Certification of Delivery for Public Notice

cc: TCEQ Region 4

LEAD & COPPER RULE MONITORING AND REPORTING VIOLATION
MANDATORY LANGUAGE - TIER III

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

[system name] has violated the monitoring and reporting requirements set by Texas Commission on Environmental Quality (TCEQ) in Chapter 30, Section 290, Subchapter F. Even though these were not emergencies, as our customers, you have the right to know what happened and what we are doing (or did) to correct these situations.

We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. During [compliance period] we [did not monitor or test – or – did not complete all monitoring or testing] for [contaminant(s)] and therefore cannot be sure of the quality of your drinking water during that time.

The table below lists the contaminant(s) we did not properly test for during the last year, how often we are supposed to sample for [these contaminants], how many samples we are supposed to take, how many samples we took, when samples should have been taken, and the date on which the follow-up samples were [or will be] taken.

Contaminant	Required sampling frequency	Number of samples taken	When samples should have been taken	When samples were or will be taken
Lead & Copper tap water sampling **(example)**	10 samples every three years	0	June 1 – Sept 30, 2014	June 1 – Sept 30, 2015

What is being done?

We are working to correct the problem. For more information, please contact [name of contact] at [phone number] or [mailing address].

[corrective actions]

_____
_____
_____
_____

Please share this information with all other people who drink this water, especially those who may not have received this notice directly (i.e., people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by [system]. Public Water System Number:
[TX_____]

Date Distributed: _____

Instructions for preparing the required Public Notice:
Recopy the mandatory language above and insert the underlined information in the spaces indicated.

Public Notice delivery timelines:
The initial public notice shall be issued as soon as possible, but in no case later than 90 days following the initial violation. All notifications require the attached Certificate of Delivery due 10 days from the posting date of the above notice.

Refer to 30 TAC §290.122 for additional information on Public Notification.

PWS_ _CO_ _PN

Texas Commission on Environmental Quality
CERTIFICATE OF DELIVERY OF PUBLIC NOTICE TO CUSTOMERS: TIER III
Public Notice (PN) to be posted within **90 days** of initial violation notification

Public Water System (PWS) name:_____
PWS ID: _____ Month / Year of violation(s): _____

Type of violation(s):

___Lead and Copper Initial Monitoring
___Lead and Copper Reduced Monitoring

30 TAC 290.122(c) requires that your PWS make an adequate, good-faith effort to reach all consumers served by the system by appropriate methods (check all below that apply):

COMMUNITY WATER SYSTEM:

___Mail or directly distribute PN to each customer receiving a bill and to other service connections to which water is delivered by the public water system;

and at least one of the following methods if direct delivery may not reach all persons regularly served by the system:

___Publish PN in local newspaper
___Deliver multiple PNs for distribution by customers that provide their drinking water to others (e.g. apartment building owners or large private employers)
___Post PN in public places
___Deliver PN to community organizations
___Post PN on the Internet at: www._____

NONCOMMUNITY WATER SYSTEM:

___Mail or directly deliver PN to each customer and service connection, or
___Post PN in conspicuous places within the water system;

and at least one of the following methods if direct delivery or public posting may not reach all persons regularly served by the system:

___Publish PN in local newspaper
___Deliver multiple PNs for distribution by customers that provide their drinking water to others (e.g. apartment building owners or large private employers)
___Post PN in public places
___Deliver PN to community organizations
___Post PN on the Internet at: www._____

REQUIRED SIGNATURE ON REVERSE SIDE

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

Certified by: (print name):_____ Title: _____

Date of Delivery to Customers: _____ Phone: _____

Signature: _____ Date: _____

Mail a copy of this completed form, AND copies of the Public Notices given to your customers to:

TCEQ – Public Drinking Water Section MC – 155
Attn: Public Notice
P. O. Box 13087
Austin, TX 78711-3087

BOTH SIDES OF THIS FORM, PLUS THE COMPLETED MANDITORY LANGUAGE, MUST BE DELIVERED TO THE TCEQ FOR PUBLIC NOTICE COMPLIANCE.

PWS_1820061_CO_20150115_NOV
RN101265213
CN600672349

Texas Commission on Environmental Quality

Protecting Texas by Reducing and Preventing Pollution

January 15, 2015

Delivered Via Regular Mail

DOUBLE DIAMOND UTILITIES CO
RANDY GRACY, PRESIDENT
5495 BELT LINE RD STE 200
DALLAS, TX 75254-7658

RECD JAN 2 2 2015

SUBJECT: **Notice of Violation: SURFACE WATER MONITORING, ROUTINE MAJOR**
CLIFFS THE - PWSID: 1820061
PALO PINTO County, TX

This letter contains important information about compliance requirements for your public water system.

Attention: Public Water System Owner / Manager / Operator

The Texas Commission on Environmental Quality (TCEQ) has determined that CLIFFS THE has a surface water monitoring and reporting violation for failing to submit a Surface Water Monthly Operating Report (SWMOR) in August 2014 for TP18486 SH 16 1 MI SW OF BRAZOS RIVER BRIDGE. The SWMOR is to be submitted monthly by the tenth day of the month following the end of each month as required in Title 30, Texas Administrative Code (30 TAC), §290, Subchapter F. The attached report summarizes each violation by monitoring period and rule.

The public notification requirements are described in 30 TAC §290.122 and include the following:

Within 90 days of identification of the violation, at a minimum, you must notify people served by the system by mail/direct delivery to bill-paying customers and continuous posting throughout the distribution system for non bill-paying customers. The public notice must use the enclosed mandatory language for every notice, and include a brief statement about what you plan to do, as described in 30 TAC §290.122(d), to fix the problem. This statement must describe what actions the water system is taking to correct the violation, and when the water system expects to return to compliance.

Please send a copy of the public notification and a signed Certificate of Delivery for Public Notice to this office within 10 days after it has been delivered. Mail to:

TCEQ - Drinking Water Inventory & Enforcement Team
Attn: Public Notice (MC-155)
P.O. Box 13087
Austin, TX 78711-3087

Enforcement actions due to noncompliance may result in fines for each violation.

Please ensure you are using the most updated version of the SWMOR form for your system. Forms and instructions are available for download at:
http://www.tceq.texas.gov/drinkingwater/swmor/swmor/swmor-forms-and-instructions/#versions

To view your public water system information at any time, visit Texas Drinking Water Watch at:
http://dww.tceq.texas.gov/DWW/

If you have questions regarding this **monitoring and reporting violation**, please contact:

Amy Jean Katterjohn, Surface Water M&R Compliance Coordinator
Email: AmyJean.Katterjohn@tceq.texas.gov
Phone: (512) 239-6141
Fax: (512) 239-6050

If you have questions regarding **public notice requirements**, please contact:

Kristine Krieg, Public Notice Compliance Coordinator
Phone: (512) 239-5723
Fax: (512) 239-3666
Email: Kristine.Krieg@tceq.texas.gov

Gary Chauvin, Manager
Public Drinking Water Section (MC-155)
Water Supply Division
Texas Commission on Environmental Quality

GC/av

Enclosures

cc: TCEQ Region 4

Monitoring and Reporting Violation Report:
CLIFFS THE PWS ID: TX1820061

Failure to Submit **PACKAGED** **SWMOR - TP18486**			
			August 2014 08/01/2014 - 08/31/2014
Analyte Code	**Violation ID**	**Analyte**	**Rule Citation**
SWMOR	1334	SWMOR	30 TAC §290.111(h)(2), §290.111(h)(3), and §290.111(h)(12) - Monitoring/Reporting Violation; Individual/Combined Filter Effluent

Texas Commission on Environmental Quality

Protecting Texas by Reducing and Preventing Pollution

CERTIFICATE OF DELIVERY OF PUBLIC NOTICE TO CUSTOMERS

Public Water System (PWS) name: **CLIFFS THE**
PWS ID (7-digit number required): **1820061**
Type violation: **Surface Water Monitoring, Routine Major**
Time Period of violation: **AUGUST 2014**

The PWS named above has distributed the Public Notice (PN) for the type of violation and time period listed above by:

Mail or direct delivery, to bill-paying customers as required by 30 TAC §290.122(c)(2)(A); and

The information contained in this public notification is correct and complies with required public notification content in accordance with 30 TAC §290.122

and; Make an adequate good-faith effort to reach non-bill-paying consumers by appropriate methods (check all below that apply):

_____ Posting the PN on the internet at www._____
_____ Mailing the PN to postal patrons within the service area that do not receive a bill
_____ Advertising the PN in news media
_____ Publication of PN in local newspaper
_____ Posting the PN in public places
_____ Delivery of multiple copies to single bill addresses serving several persons
_____ Delivery to community organizations
_____ Email notification

Date of Delivery to Customers _____

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

Certified by: Name (print):_____ Title: _____
Phone: _____ Email: _____
Signature: _____ Date Signed:_____

Mail a copy of this completed form and a copy of the Public Notice that was delivered to your customers to:

TCEQ - Drinking Water Inventory & Enforcement Team
Attn: Public Notice (MC-155)
P. O. Box 13087
Austin, TX 78711-3087

Mandatory Language for Monitoring and Reporting Violation
SURFACE WATER MONITORING, ROUTINE MAJOR

The **CLIFFS THE** water system PWS ID **TX1820061** has violated the monitoring and reporting requirements set by Texas Commission on Environmental Quality (TCEQ) in Chapter 30, Section 290, Subchapter F. Public water systems that treat surface water and/or ground water under the direct influence of surface water are required to submit monthly operating reports with operational data of the water provided to their customers.

We failed to monitor and/or report the following constituents _____

This/These violation(s) occurred in the monitoring period(s) _____
<monitoring period of violation>

Results of regular monitoring are an indicator of whether or not your drinking water is safe. We did not complete all monitoring and/or reporting for surface water constituents, and therefore TCEQ cannot be sure of the safety of your drinking water during that time.

We are taking the following actions to address this issue:

_____

_____

_____
<corrective actions>

Please share this information with all people who drink this water, especially those who may not have received this notice directly (i.e., people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

If you have questions regarding this matter, you may contact _____ at _____.
<water system official's name> <area code + phone number>

Posted /Delivered on: _____
<Date Posted>

Instructions for preparing the required Public Notice:
Recopy the mandatory language above and insert the underlined information in the spaces indicated.

Public Notice delivery timelines:
The initial public notice shall be issued as soon as possible, but in no case later than **90** days after the violation was identified. Repeat public notice shall be issued every twelve months for as long as the violation persists. All notifications require the attached Certificate of Delivery due 10 days from the posting date of the above notice.

Refer to 30 TAC §290.122 for additional information on Public Notification.

RESPONSIVE TO TCUC NO. 2-10

CONSUMER CONFIDENCE REPORT

TCEQ CERTIFICATION of DELIVERY

For Calendar year 2016

Public Water System(PWS) Name : CLIFFS THE

PWS ID Number : TX1820061

I certify that the community water system named above has distributed the Consumer Confidence Report (CCR) for the calendar year of 2016 and that the information in the report is correct and consistent with the compliance monitoring data previously submitted to the TCEQ. Public Water Systems serving 500 or fewer persons are not required to mail the entire CCR to their customers as long as the system provides notice at least once per year by July 1 to its customers by mail, door-to-door delivery, or by posting in an appropriate location that the report is available upon request.

Date of Delivery: 6/10/2017
Certified By: Name (print): Ron Cannon
Title: Utilities Manager
Phone Number: (903) 523-4313 Email: rcannon@rocksteck or texoma.com
Signature: _____ Date: 6/10/2017

Direct delivery methods-You must use at least one direct delivery method (check all that apply):

- [x] Mail a paper copy of the CCR

Electronic Delivery:

- [ ] Mail notification that CCR is available on-line at http://_____
- [ ] Email direct web address of the CCR, available at http:// _____
- [ ] Email CCR as an attachment to an email.
- [ ] Email CCR as an embedded image in an email.
- [ ] Other direct delivery (for example, door hangers or additional electronic delivery method).

Please specify:_____

Good-faith delivery methods -To reach people who do not receive bills (check all that apply):

- [ ] Posting the CCR on the Internet at http://_____
- [ ] Mailing the CCR to people who receive mail, but who do not receive bills.
- [ ] Advertising the availability of the CCR in news media.
- [x] Posting the CCR in public places.
- [ ] Delivering multiple copies to single billing addresses serving multiple persons.
- [ ] Delivering multiple copies of the CCR to community organizations.

*Systems serving 100,000 or more people are required to post the CCR on a publicly available web site and provide the URL here: http://_____

All systems are required to mail by July 1the certification of delivery and complete Consumer Confidence Report to: TCEQ recommends the use of certified mail.

Sending by certified mail:	Sending by regular mail:
TCEQ PDW, MC-155, Attn: CCR, 12100 Park 35 Circle Austin, TX 78753	TCEQ PDW, MC-155, Attn: CCR, PO Box 13087 Austin, TX 78711-3087

TCEQ-20652 (03-24-13)

Annual Drinking Water Quality Report

TX1820061 CLIFFS THE

Annual Water Quality Report for the period of January 1 to December 31, 2016

This report is intended to provide you with important information about your drinking water and the efforts made by the water system to provide safe drinking water

For more information regarding this report contact:

Name RON CAWDON

Phone 903-523-4313

CLIFFS THE is Surface Water

Este reporte incluye información importante sobre el agua para tomar. Para asistencia en español, favor de llamar al telefono (___) ___-____.

Sources of Drinking Water

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPAs Safe Drinking Water Hotline at (800) 426-4791.

Contaminants that may be present in source water include:

- Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.

- Inorganic contaminants, such as salts and metals, which can be naturally-occurring or result from urban storm water runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.

- Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban storm water runoff, and residential uses.

- Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban storm water runoff, and septic systems.

- Radioactive contaminants, which can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, EPA prescribes regulations which limit the amount of certain contaminants in water provided by public water systems. FDA regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

Contaminants may be found in drinking water that may cause taste, color, or odor problems. These types of problems are not necessarily causes for health concerns. For more information on taste, odor, or color of drinking water, please contact the system's business office.

You may be more vulnerable than the general population to certain microbial contaminants, such as Cryptosporidium, in drinking water. Infants, some elderly, or immunocompromised persons such as those undergoing chemotherapy for cancer; persons who have undergone organ transplants; those who are undergoing treatment with steroids; and people with HIV/AIDS or other immune system disorders, can be particularly at risk from infections. You should seek advice about drinking water from your physician or health care providers Additional guidelines on appropriate means to lessen the risk of infection by Cryptosporidium are available from the Safe Drinking Water Hotline (800-426-4791).

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. We are responsible for providing high quality drinking water, but we cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at http://www.epa.gov/safewater/lead.

Information about Source Water Assessments

A Source Water Susceptibility Assessment for your drinking water source(s) is currently being updated by the Texas Commission on Environmental Quality. This information describes the susceptibility and types of constituents that may come into contact with your drinking water source based on human activities and natural conditions. The information contained in the assessment allows us to focus source water protection strategies.

For more information about your sources of water, please refer to the Source Water Assessment Viewer available at the following URL:
http://gis3.tceq state.tx.us/swav/Controller/index.jsp?wtrsrc=

Further details about sources and source-water assessments are available in Drinking Water Watch at the following URL: http://dww tceq texas gov/DWW

Source Water Name		Type of Water	Report Status	Location
1 - 5	5	SW		Possum Kingdom

DDU16 - 015529

Coliform Bacteria

Maximum Contaminant Level Goal	Total Coliform Maximum Contaminant Level	Highest No of Positive	Fecal Coliform or E. Coli Maximum Contaminant Level	Total No. of Positive E. Coli or Fecal Coliform Samples	Violation	Likely Source of Contamination
0	1 positive monthly sample.	2		0	N	Naturally present in the environment.

Lead and Copper

Definitions.
Action Level Goal (ALG): The level of a contaminant in drinking water below which there is no known or expected risk to health. ALGs allow for a margin of safety
Action Level: The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.

Lead and Copper	Date Sampled	MCLG	Action Level (AL)	90th Percentile	# Sites Over AL	Units	Violation	Likely Source of Contamination
Copper	09/25/2014	1.3	1.3	0.72	0	ppm	N	Erosion of natural deposits; Leaching from wood preservatives, Corrosion of household plumbing systems.
Lead	09/25/2014	0	15	6	0	ppb	N	Corrosion of household plumbing systems; Erosion of natural deposits

Water Quality Test Results

Definitions:	The following tables contain scientific terms and measures, some of which may require explanation.
Avg:	Regulatory compliance with some MCLs are based on running annual average of monthly samples.
Maximum Contaminant Level or MCL:	The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.
Level 1 Assessment:	A Level 1 assessment is a study of the water system to identify potential problems and determine (if possible) why total coliform bacteria have been found in our water system.
Maximum Contaminant Level Goal or MCLG	The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

Water Quality Test Results

Level 2 Assessment	A Level 2 assessment is a very detailed study of the water system to identify potential problems and determine (if possible) why an E coli MCL violation has occurred and/or why total coliform bacteria have been found in our water system on multiple occasions.
Maximum residual disinfectant level or MRDL:	The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.
Maximum residual disinfectant level goal or MRDLG:	The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.
MFL	million fibers per liter (a measure of asbestos)
na:	not applicable
mrem:	millirems per year (a measure of radiation absorbed by the body)
NTU	nephelometric turbidity units (a measure of turbidity)
pCi/L	picocuries per liter (a measure of radioactivity)
ppb	micrograms per liter or parts per billion - or one ounce in 7,350,000 gallons of water.
ppm:	milligrams per liter or parts per million - or one ounce in 7,350 gallons of water.
Treatment Technique or TT:	A required process intended to reduce the level of a contaminant in drinking water.
ppt	parts per trillion, or nanograms per liter (ng/L)
ppq	parts per quadrillion, or picograms per liter (pg/L)

Regulated Contaminants

Disinfectants and Disinfection By-Products	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Haloacetic Acids (HAA5)	2016	2	0 - 5 5	No goal for the total	60	ppb	N	By-product of drinking water disinfection
Total Trihalomethanes (TTHM)	2016	8	0 - 23	No goal for the total	80	ppb	N	By-product of drinking water disinfection
Inorganic Contaminants	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Barium	2016	0.0042	0.0042 - 0.0042	2	2	ppm	N	Discharge of drilling wastes, Discharge from metal refineries; Erosion of natural deposits.
Nitrate [measured as Nitrogen]	2016	0 097	0 097 - 0.097	10	10	ppm	N	Runoff from fertilizer use; Leaching from septic tanks, sewage; Erosion of natural deposits.

Turbidity

	Limit (Treatment Technique)	Level Detected	Violation	Likely Source of Contamination
Highest single measurement	1 NTU	0.12 NTU	N	Soil runoff.
Lowest monthly % meeting limit	0 3 NTU	100%	N	Soil runoff.

Information Statement Turbidity is a measurement of the cloudiness of the water caused by suspended particles. We monitor it because it is a good indicator of water quality and the effectiveness of our filtration

Violations Table

Interim Enhanced SWTR			
The Interim Enhanced Surface Water Treatment Rule improves control of microbial contaminants, particularly Cryptosporidium, in systems using surface water, or ground water under the direct influence of surface water The rule builds upon the treatment technique requirements of the Surface Water Treatment Rule.			
Violation Type	Violation Begin	Violation End	Violation Explanation
MONITORING, ROUTINE (IESWTR/LT1), MAJOR	03/01/2016	03/31/2016	We failed to test our drinking water for the contaminant and period indicated. Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated.
MONITORING, ROUTINE (IESWTR/LT1), MAJOR	04/01/2016	04/30/2016	We failed to test our drinking water for the contaminant and period indicated. Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated

Lead and Copper Rule			
The Lead and Copper Rule protects public health by minimizing lead and copper levels in drinking water, primarily by reducing water corrosivity. Lead and copper enter drinking water mainly from corrosion of lead and copper containing plumbing materials.			
Violation Type	Violation Begin	Violation End	Violation Explanation
FOLLOW-UP OR ROUTINE TAP M/R (LCR)	10/01/2015	2016	We failed to test our drinking water for the contaminant and period indicated. Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated
FOLLOW-UP OR ROUTINE TAP M/R (LCR)	10/01/2016	2016	We failed to test our drinking water for the contaminant and period indicated. Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated

Public Notification Rule			
The Public Notification Rule helps to ensure that consumers will always know if there is a problem with their drinking water. These notices immediately alert consumers if there is a serious problem with their drinking water (e.g., a boil water emergency).			
Violation Type	Violation Begin	Violation End	Violation Explanation
PUBLIC NOTICE RULE LINKED TO VIOLATION	02/08/2016	2016	We failed to adequately notify you, our drinking water consumers, about a violation of the drinking water regulations.
PUBLIC NOTICE RULE LINKED TO VIOLATION	08/11/2016	05/26/2017	We failed to adequately notify you, our drinking water consumers, about a violation of the drinking water regulations.
PUBLIC NOTICE RULE LINKED TO VIOLATION	08/11/2016	2016	We failed to adequately notify you, our drinking water consumers, about a violation of the drinking water regulations
PUBLIC NOTICE RULE LINKED TO VIOLATION	09/19/2016	2016	We failed to adequately notify you, our drinking water consumers, about a violation of the drinking water regulations

Violations Table

Surface Water Treatment Rule (SWTR)			
The Surface Water Treatment Rule seeks to prevent waterborne diseases caused by viruses, Legionella, and Giardia lamblia. The rule requires that water systems filter and disinfect water from surface water sources to reduce the occurrence of unsafe levels of these microbes.			
Violation Type	Violation Begin	Violation End	Violation Explanation
MONITORING, RTN/RPT MAJOR (SWTR-FILTER)	03/01/2016	03/31/2016	We failed to test our drinking water for the contaminant and period indicated Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated.
MONITORING, RTN/RPT MAJOR (SWTR-FILTER)	04/01/2016	04/30/2016	We failed to test our drinking water for the contaminant and period indicated Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated.

Annual Drinking Water Quality Report

TX1820061 CLIFFS THE

Annual Water Quality Report for the period of January 1 to December 31, 2014

This report is intended to provide you with important information about your drinking water and the efforts made by the water system to provide safe drinking water

For more information regarding this report contact

Name _Josh Nolte_____

Phone _940-779-2734_____

CLIFFS THE is Surface Water

Este reporte incluye informacion importante sobre el agua para tomar. Para asistencia en español, favor de llamar al telefono (___) ___-____

Sources of Drinking Water

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive material, and can pickup substances resulting from the presence of animals or from human activity.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPAs Safe Drinking Water Hotline at (800) 426-4791.

Contaminants that may be present in source water include:

- Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.

- Inorganic contaminants, such as salts and metals, which can be naturally-occurring or result from urban storm water runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.

- Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban storm water runoff, and residential uses.

- Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban storm water runoff, and septic systems.

Information about Source Water Assessments

The TCEQ completed an assessment of your source water and results indicate that some of your sources are susceptible to certain contaminants. The sampling requirements for your water system are based on this susceptibility and previous sample data. Any detections of these contaminants may be found in this Consumer Confident Report. For more information on source water assesments and protection efforts at our system, contact Josh Nolte

For more information about your sources of water, please refer to the Source Water Assessment Viewer available at the following URL http //www.tceq texas gov/gis/swaview

Further details about sources and source-water assessments are available in Drinking Water Watch at the following URL http //dww tceq state tx.us/DWW/

Source Water Name		Type of Water	Report Status	Location
1 - 5	5	SW	_____	_Possum Kingdom Lake_____

- Radioactive contaminants, which can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, EPA prescribes regulations which limit the amount of certain contaminants in water provided by public water systems. FDA regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

Contaminants may be found in drinking water that may cause taste, color, or odor problems. These types of problems are not necessarily causes for health concerns. For more information on taste, odor, or color of drinking water, please contact the system's business office.

You may be more vulnerable than the general population to certain microbial contaminants, such as Cryptosporidium, in drinking water Infants, some elderly, or immunocompromised persons such as those undergoing chemotherapy for cancer; persons who have undergone organ transplants; those who are undergoing treatment with steroids; and people with HIV/AIDS or other immune system disorders, can be particularly at risk from infections. You should seek advice about drinking water from your physician or health care providers Additional guidelines on appropriate means to lessen the risk of infection by Cryptosporidium are available from the Safe Drinking Water Hotline (800-426-4791).

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. We are responsible for providing high quality drinking water, but we cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at http://www.epa.gov/safewater/lead.

2014 Regulated Contaminants Detected

Lead and Copper

Definitions
Action Level Goal (ALG) The level of a contaminant in drinking water below which there is no known or expected risk to health ALGs allow for a margin of safety
Action Level The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow

Lead and Copper	Date Sampled	MCLG	Action Level (AL)	90th Percentile	# Sites Over AL	Units	Violation	Likely Source of Contamination
Copper	2014	1.3	1.3	0.72	0	ppm	N	Erosion of natural deposits, Leaching from wood preservatives, Corrosion of household plumbing systems.
Lead	2014	0	15	6	0	ppb	N	Corrosion of household plumbing systems, Erosion of natural deposits.

Disinfectant	Year	Average Level	Minimum Level	Maximum Level	MRDL	MRDLG	Unit of Measure	Violation (Y/N)	Likely Source of Contamination
CL2	2014	1.13	.20	2.2	4.0	4.0	ppm	No	Water additive used to control microbes.

Water Quality Test Results

Definitions	The following tables contain scientific terms and measures, some of which may require explanation.
Avg.	Regulatory compliance with some MCLs are based on running annual average of monthly samples
Maximum Contaminant Level or MCL	The highest level of a contaminant that is allowed in drinking water MCLs are set as close to the MCLGs as feasible using the best available treatment technology
Maximum Contaminant Level Goal or MCLG	The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety
Maximum residual disinfectant level or MRDL	The highest level of a disinfectant allowed in drinking water There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants
Maximum residual disinfectant level goal or MRDLG	The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants
MFL	million fibers per liter (a measure of asbestos)
na	not applicable.
NTU	nephelometric turbidity units (a measure of turbidity)
pCi/L	picocuries per liter (a measure of radioactivity)

Water Quality Test Results

ppb	micrograms per liter or parts per billion - or one ounce in 7,350,000 gallons of water
ppm	milligrams per liter or parts per million - or one ounce in 7,350 gallons of water
ppt	parts per trillion, or nanograms per liter (ng/L)
ppq	parts per quadrillion, or picograms per liter (pg/L)

Regulated Contaminants

Disinfectants and Disinfection By-Products	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Haloacetic Acids (HAA5)*	2014	1	0 - 3 5	No goal for the total	60	ppb	N	By-product of drinking water disinfection
Inorganic Contaminants	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Barium	2014	0.00344	0.00344 - 0.00344	2	2	ppm	N	Discharge of drilling wastes, Discharge from metal refineries, Erosion of natural deposits.
Nitrate [measured as Nitrogen]	2014	0 072	0 072 - 0 072	10	10	ppm	N	Runoff from fertilizer use, Leaching from septic tanks, sewage, Erosion of natural deposits

Turbidity

	Limit (Treatment Technique)	Level Detected	Violation	Likely Source of Contamination
Highest single measurement	1 NTU	0 06 NTU	N	Soil runoff.
Lowest monthly % meeting limit	0 3 NTU	100%	N	Soil runoff.

Information Statement Turbidity is a measurement of the cloudiness of the water caused by suspended particles We monitor it because it is a good indicator of water quality and the effectiveness of our filtration

Violations Table

Interim Enhanced SWTR

The Interim Enhanced Surface Water Treatment Rule improves control of microbial contaminants, particularly Cryptosporidium, in systems using surface water, or ground water under the direct influence of surface water The rule builds upon the treatment technique requirements of the Surface Water Treatment Rule

Violation Type	Violation Begin	Violation End	Violation Explanation
MONITORING, ROUTINE (IESWTR/LT1), MAJOR	08/01/2014	08/31/2014	We failed to test our drinking water for the contaminant and period indicated Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated

Surface Water Treatment Rule (SWTR)

The Surface Water Treatment Rule seeks to prevent waterborne diseases caused by viruses, Legionella, and Giardia lamblia The rule requires that water systems filter and disinfect water from surface water sources to reduce the occurrence of unsafe levels of these microbes

Violation Type	Violation Begin	Violation End	Violation Explanation
MONITORING, RTN/RPT MAJOR (SWTR-FILTFR)	08/01/2014	08/31/2014	We failed to test our drinking water for the contaminant and period indicated Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated

Annual Drinking Water Quality Report

TX1820061 CLIFFS THE

Annual Water Quality Report for the period of January 1 to December 31, 2015

This report is intended to provide you with important information about your drinking water and the efforts made by the water system to provide safe drinking water.

For more information regarding this report contact

Name Buck Nunley

Phone 940-521-6268

CLIFFS THE is Surface Water

Este reporte incluye información importante sobre el agua para tomar Para asistencia en español, favor de llamar al telefono (940)779-4554.

Sources of Drinking Water

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive material, and can pickup substances resulting from the presence of animals or from human activity.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPAs Safe Drinking Water Hotline at (800) 426-4791.

Contaminants that may be present in source water include:

- Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.

- Inorganic contaminants, such as salts and metals, which can be naturally-occurring or result from urban storm water runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.

- Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban storm water runoff, and residential uses.

- Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban storm water runoff, and septic systems.

- Radioactive contaminants, which can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, EPA prescribes regulations which limit the amount of certain contaminants in water provided by public water systems. FDA regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

Contaminants may be found in drinking water that may cause taste, color, or odor problems. These types of problems are not necessarily causes for health concerns. For more information on taste, odor, or color of drinking water, please contact the system's business office.

You may be more vulnerable than the general population to certain microbial contaminants, such as Cryptosporidium, in drinking water. Infants, some elderly, or immunocompromised persons such as those undergoing chemotherapy for cancer; persons who have undergone organ transplants; those who are undergoing treatment with steroids; and people with HIV/AIDS or other immune system disorders, can be particularly at risk from infections. You should seek advice about drinking water from your physician or health care providers Additional guidelines on appropriate means to lessen the risk of infection by Cryptosporidium are available from the Safe Drinking Water Hotline (800-426-4791).

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. We are responsible for providing high quality drinking water, but we cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at http://www.epa.gov/safewater/lead.

Information about Source Water Assessments

A Source Water Susceptibility Assessment for your drinking water source(s) is currently being updated by the Texas Commission on Environmental Quality. This information describes the susceptibility and types of constituents that may come into contact with your drinking water source based on human activities and natural conditions. The information contained in the assessment allows us to focus source water protection strategies.

For more information about your sources of water, please refer to the Source Water Assessment Viewer available at the following URL. http://www.tceq.texas.gov/gis/swaview

Further details about sources and source-water assessments are available in Drinking Water Watch at the following URL: http://dww2.tceq.texas.gov/DWW/

Source Water Name		Type of Water	Report Status	Location
1 - 5	5	SW	A	Possum Kingdom Lake, Palo Pinto County

The TCEQ completed an assessment of your source water and results indicate that some of your sources are susceptible to certain contaminants. The sampling requirements for your water system are based on this susceptibility and previous sample data. Any detections of these contaminants may be found in this Consumer Confident Report. For more information on source water assessments and protection efforts at our system, contact Buck Nunley @ 940-521-6268

DDU16 - 015543

Lead and Copper

Definitions:
Action Level Goal (ALG) The level of a contaminant in drinking water below which there is no known or expected risk to health. ALGs allow for a margin of safety.
Action Level. The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.

Lead and Copper	Date Sampled	MCLG	Action Level (AL)	90th Percentile	# Sites Over AL	Units	Violation	Likely Source of Contamination
Copper	09/25/2014	1.3	1.3	0.72	0	ppm	N	Erosion of natural deposits; Leaching from wood preservatives; Corrosion of household plumbing systems.
Lead	09/25/2014	0	15	6	0	ppb	N	Corrosion of household plumbing systems; Erosion of natural deposits.

Water Quality Test Results

Definitions:	The following tables contain scientific terms and measures, some of which may require explanation
Avg.	Regulatory compliance with some MCLs are based on running annual average of monthly samples
Maximum Contaminant Level or MCL:	The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.
Maximum Contaminant Level Goal or MCLG:	The level of a contaminant in drinking water below which there is no known or expected risk to health MCLGs allow for a margin of safety
Maximum residual disinfectant level or MRDL:	The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.
Maximum residual disinfectant level goal or MRDLG	The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.
MFL	million fibers per liter (a measure of asbestos)
na:	not applicable.
NTU	nephelometric turbidity units (a measure of turbidity)
pCi/L	picocuries per liter (a measure of radioactivity)

Water Quality Test Results

ppb:	micrograms per liter or parts per billion - or one ounce in 7,350,000 gallons of water
ppm	milligrams per liter or parts per million - or one ounce in 7,350 gallons of water
ppt	parts per trillion, or nanograms per liter (ng/L)
ppq	parts per quadrillion, or picograms per liter (pg/L)

Regulated Contaminants

Disinfectants and Disinfection By-Products	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Haloacetic Acids (HAA5)*	2015	1	0 - 1 2	No goal for the total	60	ppb	N	By-product of drinking water disinfection.
Total Trihalomethanes (TTHM)	2015	2	0 - 3.29	No goal for the total	80	ppb	N	By-product of drinking water disinfection
Inorganic Contaminants	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Barium	2015	0.004	0 004 - 0 004	2	2	ppm	N	Discharge of drilling wastes, Discharge from metal refineries; Erosion of natural deposits.
Nitrate [measured as Nitrogen]	2015	0.0195	0 0195 - 0.0195	10	10	ppm	N	Runoff from fertilizer use, Leaching from septic tanks, sewage; Erosion of natural deposits

Turbidity

	Limit (Treatment Technique)	Level Detected	Violation	Likely Source of Contamination
Highest single measurement	1 NTU	0 04 NTU	N	Soil runoff.
Lowest monthly % meeting limit	0.3 NTU	100%	N	Soil runoff.

Information Statement Turbidity is a measurement of the cloudiness of the water caused by suspended particles. We monitor it because it is a good indicator of water quality and the effectiveness of our filtration

Violations Table

Lead and Copper Rule

The Lead and Copper Rule protects public health by minimizing lead and copper levels in drinking water, primarily by reducing water corrosivity. Lead and copper enter drinking water mainly from corrosion of lead and copper containing plumbing materials.

Violation Type	Violation Begin	Violation End	Violation Explanation
FOLLOW-UP OR ROUTINE TAP M/R (LCR)	10/01/2015	2015	We failed to test our drinking water for the contaminant and period indicated. Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated

Total Coliform

Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.

Violation Type	Violation Begin	Violation End	Violation Explanation
MONITORING (TCR), ROUTINE MAJOR	10/01/2015	10/31/2015	We failed to test our drinking water for the contaminant and period indicated Because of this failure, we cannot be sure of the quality of our drinking water during the period indicated.

Disinfectant	Year	Average Level	Minimum Level	Maximum Level	MRDL	MRDLG	Unit of Measure	Violation (Y/N)	Likely Source of Contamination
Sodium Hypo	2015	1.23	0.25	2.80	0.2	4.0	ppm	N	Water additive used to control microbes.