

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX0360028 (7 digit ID)

Name of PWS: Bayridge Subdivision Water System

Date of last TCEQ compliance inspection: 4/28/2017 (attach TCEQ letter)

Subdivisions served: Bayridge

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit *submitted* to TCEQ: \_\_\_\_\_

23. List the number of *existing* connections, by meter/connection type, to be affected by the proposed transaction:

Water			Sewer	
	Non-metered		2"	Residential
75	5/8" or 3/4"		3"	Commercial
	1"		4"	Industrial
	1 1/2"		Other	Other
Total Water Connections:			75	Total Sewer Connections:

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?  
 No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_  
 Water: \_\_\_\_\_  
 Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?  
 No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the Transferee?  
 No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?  
 No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part G: Mapping & Affidavits**

***ALL applications require mapping information to be filed in conjunction with the STM application. Read question 29 A and B to determine what information is required for your application.***

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application:

1. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.

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

Regulated Entity/Site Name:	BAYRIDGE SUBDIVISION	WP	TCEQ Add. ID No. RN No. (optional):	0360028
Investigation Type:	COMPLAINT	Contact Made In-House (Y/N):	Purpose of Investigation:	COMPLAINT
Regulated Entity Contact:	BOBBY BRASWELL	Telephone No.:	281-3551312	Date Contacted: 04/28/2017
Title:	OPERATOR	Fax No.:		Date Faxed:

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

Issue		For Records Request: identify the necessary records, the company contact and date due to the agency. 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	Rule Citation (if known)	Description of Issue
1	RR		COPY OF DISTRIBUTION MAP
2	RR		COPY OF FLUSHING LOGS ( <del>JAN</del> FEB-APR 2017)
3	RR		WORK ORDER/INVOICE OF CHLORINATION EQUIPMENT REPAIR
4	RR		MOR'S for FEB & MAR, 2017
5	RR		BACTERIOLOGICAL LAB RESULTS AFTER BWN
6			

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

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

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

Kathryn Roeder KATHRYN ROEDER	04/28/2017	Bobby Braswell	4/28/17
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.

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 21, 2017

Mr. Gregory P. Pappas  
Nerro Supply, LLC  
P.O. Box 691008  
Houston, Texas 77269-1008


Re: **Complaint Investigation at:**  
Bayridge Subdivision Water System, 7919 Bayridge Drive, Beach City, Chambers County,  
Texas  
Regulated Entity No.: 101241255, TCEQ ID No.: 0360028, Investigation No.: 1409756

Dear Mr. Pappas:

On April 28, 2017, Ms. Kathryn Roeder and on May 1, 2017, Ms. Kathleen Campbell of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced facility to evaluate compliance with the applicable requirements for public water supply systems. No violations are being alleged as a result of the investigation; however, during the investigation, the investigator resolved apparent instances of noncompliance noted during the previous investigation dated March 17, 2016. Information has been provided which appears to indicate that these outstanding problems have been corrected. In addition, please be advised that a violation could be issued upon further review of your system's records or self-reported documentation. No further response from you is necessary concerning this investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Julia Thorp in the Houston Region Office at (713) 767-3697.

Sincerely,

  
Julia Thorp, Team Leader  
Public Water Supply  
Houston Region Office

JT/TC/sm

cc: Chambers County Environmental Health & Permitting, P.O. Box 1180, Anahuac, Texas  
77514-1180

Enclosure: Summary of Findings



# Summary of Investigation Findings

COPY

BAYRIDGE SUBDIVISION WATER SYSTEM  
7919 BAYRIDGE  
BAYTOWN, CHAMBERS COUNTY, TX 77520

Investigation #  
1409756  
Investigation Date: 04/28/2017

Additional ID(s): 0360028

## ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 603073

30 TAC Chapter 290.48(m)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/04/2016

Operating Practices for Public Water Systems

Failure to properly maintain the regulated entity by not repairing or replacing rusted ground storage tank.

Investigation: 1409756

Comment Date: 10/13/2017

Operating Practices for Public Water Systems

Failure to properly maintain the regulated entity by not repairing or replacing rusted ground storage tank.

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** On October 18, 2016, the TCEQ Houston Region Office received a copy of the work order with pictures of the repairs to the Ground Storage Tank.

Track No: 603082

30 TAC Chapter 290.42(e)(4)(C)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/04/2016

Disinfection

Failure to provide an operable high level forced draft ventilation fan in the gas chlorination room. The fan must be repaired or replaced.

Note: The gas chlorination room did not have a ventilation fan or lighting at the time of the investigation.

Investigation: 1409756

Comment Date: 10/13/2017

Disinfection

Failure to provide an operable high level forced draft ventilation fan in the gas chlorination room. The fan must be repaired or replaced.

Note: The gas chlorination room did not have a ventilation fan or lighting at the time of the investigation.

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** On October 18 2016, the TCEQ Houston Region Office received a copy of the work order and a receipt for the installation of a vent fan.

Track No: 603085

30 TAC Chapter 290.46(s)(1)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/04/2016

**Testing Equipment**

Failure by the regulated entity to calibrate the well meter required by 30 TAC 290.41(c)(3)(N) according to the manufacturer's specifications at least once every three years.

Investigation: 1409756

Comment Date: 10/13/2017

**Testing Equipment**

Failure by the regulated entity to calibrate the well meter required by 30 TAC 290.41(c)(3)(N) according to the manufacturer's specifications at least once every three years.

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** On October 18, 2016, the TCEQ Houston Region Office received a copy of the well meter calibration record.

Track No: 603086

30 TAC Chapter 290.42(l)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/04/2016

**Plant Operations Manual**

Failure to compile and maintain a current and thorough plant operations manual for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedure as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency.

Investigation: 1409756

Comment Date: 10/13/2017

**Plant Operations Manual**

Failure to compile and maintain a current and thorough plant operations manual for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedure as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency.

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** On October 18, 2016, the TCEQ Houston Region Office received a copy of the plant operations manual.

Track No: 603087

30 TAC Chapter 290.121(a)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/04/2016

**Monitoring Plan**

Failure to develop and maintain an up to date system monitoring plan. The plan shall identify all bacteriological and chemical locations, describe the sampling frequency, and specify the analytical procedures and laboratories to be used to comply with monitoring requirements. The completed plan must be retained at each water plant, and made available for review during succeeding investigations.

Investigation: 1409756

Comment Date: 10/13/2017

**Monitoring Plan**

Failure to develop and maintain an up to date system monitoring plan. The plan shall identify all bacteriological and chemical locations, describe the sampling frequency, and specify the analytical procedures and laboratories to be used to comply with monitoring requirements. The completed plan must be retained at each water plant, and made available for review during succeeding investigations.

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** On October 18, 2016, the TCEQ Houston Region Office received a copy of the monitoring plan.

Track No: 603181

30 TAC Chapter 290.42(e)(4)(A)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/05/2016

**Disinfection**

Failure to provide a full-face self-contained breathing apparatus or supplied air respirator that meets OSHA standards for construction and operation which must be located outside the chlorination room in an accessible location.

Investigation: 1409766

Comment Date: 10/13/2017

**Disinfection**

Failure to provide a full-face self-contained breathing apparatus or supplied air respirator that meets OSHA standards for construction and operation which must be located outside the chlorination room in an accessible location.

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** On October 18, 2016, the TCEQ Houston Region Office received a copy of the work order to order and place a respirator at the water plant outside the chlorine room.

Track No: 603334

30 TAC Chapter 290.46(b)(1)(C)(ii)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/09/2016

**Capacity Requirement**

Failure to meet this Agency's "Minimum Water System Capacity Requirements." These requirements include:

Ground Storage Tank is at 101% of its capacity (200x81=16,200 Gallons Required 16,000 Gallons Provided 16,200/16000x100=101%).

Your water system must be modified to meet this/ these requirement(s) to assure an adequate supply of water at all times.

Please be advised that public water systems shall notify the executive director prior to making any significant change or addition to the system's production, treatment, storage, or distribution facilities. Public water systems shall submit plans and specifications for the proposed changes upon request.

The water system may request an exception to these requirements by writing to TCEQ, Water Supply Division, Public Drinking Water Section, Technical Review & Oversight, MC 159, P.O. Box 13087, Austin, TX 78711-3087; phone: (512) 239-4691.

Investigation: 1409766

Comment Date: 11/15/2017

**Capacity Requirement**

Failure to meet this Agency's "Minimum Water System Capacity Requirements." These requirements include:

Ground Storage Tank is at 101% of its capacity (200x81=16,200 Gallons Required 16,000 Gallons Provided 16,200/16000x100=101%).

Pursuant to the Revised Temporary Alternative Capacity Requirement (ACR) dated August 11, 2017, TCEQ granted an alternative total storage capacity of 87 gallons per connection to



the water system.

Using the new ACR total storage capacity the ground Storage Tank is at 44% of its capacity (87x81=7,047 Gallons Required 16,000 Gallons Provided 7,047/16,000x100=44%).

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** By TCEQ letter dated August 11, 2017, a request for an exception to use a calculated peak daily demand for an alternative capacity requirement was approved.

Track No: 603339

30 TAC Chapter 291.93(3)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/09/2016

**Certificate of Convenience and Necessity**

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

Note: Ground Storage Tank is at 101% of it's capacity(200x81=16,200 Gallons Required 16,000 Gallons Provided 16,200/16000x100=101%). Service Pump is at 95% of it's capacity. (2x81=162 GPM Required 170 GPM Provided 162/170x100=95.2%).

Investigation: 1409756

Comment Date: 10/18/2017

**Certificate of Convenience and Necessity**

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

Note: Ground Storage Tank is at 101% of it's capacity(200x81=16,200 Gallons Required 16,000 Gallons Provided 16,200/16000x100=101%). Service Pump is at 95% of it's capacity. (2x81=162 GPM Required 170 GPM Provided 162/170x100=95.2%).

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** By TCEQ letter dated August 11, 2017, an Alternative Capacity Requirement was conditionally approved.

Track No: 603662

30 TAC Chapter 290.41(c)(3)(A)

**Alleged Violation:**

Investigation: 1319037

Comment Date: 05/11/2016

**Ground Water Sources and Development**

Failure to submit the well completion data on Well Number 2 for our review and approval before placing the well into service. This data must include copies of:

1. an executed sanitary control easement or other documentation demonstrating compliance with 30 TAC, §290.41(c)(1)(F) for all property located within 150 feet of the well head,
2. the well Driller's Log (geological log and material setting report)
3. the cementing certificate,
4. the results of a 36-hour pump test which shows the steady state capacity of the well,
5. the results of chemical analysis performed by an accredited laboratory,

- 6. three consecutive daily coliform-free raw water bacteriological analyses conducted by a TCEQ accredited laboratory, and
- 7. an original or legible copy of a U.S. Geological Survey 7.5 minute topographical quadrangle map showing the accurate well location.

Please be aware you may apply for an exception to this regulation or if you have the well completion data please submit all requests to:  
 Texas Commission on Environmental Quality, Utilities Review and Oversight Team (MC-158),  
 P.O. Box 13087, Austin, Texas 78711-3087; phone (512)239-4691.  
 Investigation: 1409766 Comment Date: 10/13/2017

**Ground Water Sources and Development**

Failure to submit the well completion data on Well Number 2 for our review and approval before placing the well into service. This data must include copies of:

- 1. an executed sanitary control easement or other documentation demonstrating compliance with 30 TAC, §290.41(c)(1)(F) for all property located within 150 feet of the well head,
- 2. the well Driller's Log (geological log and material setting report)
- 3. the cementing certificate,
- 4. the results of a 36-hour pump test which shows the steady state capacity of the well,
- 5. the results of chemical analysis performed by an accredited laboratory,
- 6. three consecutive daily coliform-free raw water bacteriological analyses conducted by a TCEQ accredited laboratory, and
- 7. an original or legible copy of a U.S. Geological Survey 7.5 minute topographical quadrangle map showing the accurate well location.

Please be aware you may apply for an exception to this regulation or if you have the well completion data please submit all requests to:  
 Texas Commission on Environmental Quality, Utilities Review and Oversight Team (MC-158),  
 P.O. Box 13087, Austin, Texas 78711-3087; phone (512)239-4691.

**Recommended Corrective Action:** Submit compliance documentation demonstrating corrective measures have been taken to resolve the alleged violation.

**Resolution:** By TCEQ letter dated January 13, 2017, well No. 2 is approved for use.

**ADDITIONAL ISSUES**

**Description**  
Item 10

**Additional Comments**  
 30 TAC, §290.42(b)(2); 30 TAC, §290.105, §290.118 (SCLs) Chemical Analysis  
 Failure to meet the commission's minimum standards noted in the most recent chemical analysis conducted by the certified laboratory which indicates the quality of the water produced by the system. Specifically, the iron concentration of 0.466 mg/L exceeds the maximum contaminant level for this contaminant which is 0.3 mg/L. The chloride concentration of 392 mg/L exceeds the maximum contaminant level for this contaminant which is 300 mg/L. The total dissolved solids (TDS) concentration of 1030 mg/L exceeds the maximum contaminant level for this contaminant which is 1000 mg/L. Elevated iron levels may stain laundry and plumbing fixtures. Elevated chloride levels may increase the corrosiveness of the water and give it a salty taste. Elevated levels of dissolved solids may give the water an objectionable mineral taste.

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX0210039 (7 digit ID)

Name of PWS: Benchley Oaks Subdivision

Date of last TCEQ compliance inspection: 9/6/2018 (attach TCEQ letter)

Subdivisions served: Benchley Oaks

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ - (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit submitted to TCEQ: \_\_\_\_\_

23. List the number of existing connections, by meter/connection type, to be affected by the proposed transaction:

Water			Sewer		
	Non-metered	2"		Residential	
61	5/8" or 3/4"	3"		Commercial	
	1"	4"		Industrial	
	1 1/2"	Other		Other	
Total Water Connections:		161	Total Sewer Connections:		

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes:

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?

No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_

Water: \_\_\_\_\_

Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?

No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the Transferee?

No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?

No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part C: Mapping & Affidavit**

**ALL applications require mapping information to be filed in conjunction with the STM application.**

***Read question 29 A and B to determine what information is required for your application.***

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application:

1. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.

Jon Niernamm, *Chairman*  
Emily Lindley, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

October 5, 2018

Mr. Gregory Pappas, Manager  
Nerro Supply LLC  
P.O. Box 691008  
Houston, TX 77269

Re: Complaint Investigation at:  
Benchley Oaks Subdivision, Brazos County, Texas  
TCEQ ID No.: RN102686292, PWS ID No.: 0210039

Dear Mr. Pappas:

On September 6, 2018, Katelyn Mehringer of the Texas Commission on Environmental Quality (TCEQ) Waco Regional Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for a public water supply. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Katelyn Mehringer in the Waco Regional Office at Phone (254) 751-0335.

Sincerely,

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

Richard Monreal  
Water Section Manager  
Waco Regional Office  
Texas Commission on Environmental Quality

RM/KM/gb

**Part F TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX1700539 (7 digit ID)

Name of PWS: Hillgreen Subdivision Water Co.

Date of last TCEQ compliance inspection: 12/4/2018 (attach TCEQ letter)

Subdivisions served: Hillgreen

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit *submitted* to TCEQ: \_\_\_\_\_

23. List the number of *existing* connections, by meter/connection type, to be affected by the proposed transaction:

Water			Sewer		
	Non-metered		2"		Residential
48	5/8" or 3/4"		3"		Commercial
	1"		4"		Industrial
	1 1/2"		Other		Other
Total Water Connections:			48	Total Sewer Connections:	

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes:

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 30, 2019

Mr. Gregory P. Pappas  
President  
Nerro Supply, LLC  
Post Office Box 691008  
Houston, Texas 77269-1008

Re: **Modified Comprehensive Compliance Investigation at:**  
**Hillgreen Subdivision Water Company, 2601 North Green Circle, Conroe, Montgomery**  
**County, Texas**  
Regulated Entity No.: 101376531 TCEQ ID No.: 1700539 Investigation No.: 1532206

Dear Mr. Pappas:

On December 4, 2018, Mr. Maytham Faris of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced facility to evaluate compliance with the applicable requirements for public water supply systems. No violations are being alleged as a result of the investigation. In addition, please be advised that a violation could be issued upon further review of your system's records or self-reported documentation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Faris in the Houston Region Office at (713) 767-3509.

Sincerely,

A handwritten signature in cursive script that reads "Latrichia Spikes".

Latrichia Spikes  
Team Leader  
Public Water Supply  
Houston Region Office

LS/MF/sh

cc: **Montgomery County Environmental Health Services**  
**501 North Thompson Street, Suite 101, Conroe, Texas 77301-2500**

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX0260010 (7 digit ID)

Name of PWS: Lakeview N Marshall Oaks Somerville Place

Date of last TCEQ compliance inspection: 12/09/2016 (attach TCEQ letter)

Subdivisions served: Lakeview N Marshall Oaks

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit submitted to TCEQ: \_\_\_\_\_

23. List the number of existing connections, by meter/connection type, to be affected by the proposed transaction:

Water			Sewer		
	Non-metered	2"		Residential	
78	5/8" or 3/4"	3"		Commercial	
	1"	4"		Industrial	
	1 1/2"	Other		Other	
Total Water Connections: 78			Total Sewer Connections: _____		

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes:

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_



26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?  
 No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_  
 Water: \_\_\_\_\_  
 Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?  
 No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the Transferee?  
 No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?  
 No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part G. Mapping & Affidavits**

**ALL applications require mapping information to be filed in conjunction with the STM application.  
 Read question 29 A and B to determine what information is required for your application.**

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application:

1. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.

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

Regulated Entity/Site Name	Lakeview N Marshall	TCEQ Add. ID No. RN No. (optional)	260010
Investigation Type	C.C.I. Contact Made In-House (Y/N) <i>NI</i>	Purpose of Investigation	Routine Inspection
Regulated Entity Contact	Roy Duke	Telephone No.	832-797-1257
Title	Operator	Fax No.	
		Date Contacted	12-9-15
		Date Faxed	

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

Issue		For Records Request: identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
1	AV	290.109(c)(1)(b)	Collecting samples at locations not in monitoring plan
2	AV	290.46(f)(2)	Missing flushing log, drought contingency plan, and sanitary control easements
3	AV	290.46(j)	Need to use commissioner form 20499 for CSE

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

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

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

<i>Auburn Tiller Hodson Tiller</i>	12-9-15	<i>Roy Duke</i>	12-9-15
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 or its forms. They may also have any errors in their information corrected. To review such information, call 512-239-3282.



December 19, 2016

Hudson Tuller  
Comprehensive Compliance Investigation  
Lakeview N. Marshall Oaks  
PWS ID 0260010

Mr. Tuller,

Please find the requested compliance items attached in reference to Lakeview N. Marshall Oaks' investigation on December 9, 2016.

1. Failure to collect samples at locations not in monitoring plan.
  - The sample site plan is located in Attachment A, pages 2-9. The laboratory that samples for us has been sent this plan and will be sampling only from the specified locations listed.
2. Missing Flushing Log
  - Located in Attachment B, pages 14-15, is our dead end flushing procedures that are being implemented each month to ensure that proper protocol is being followed and each system is being flushed accordingly.
3. Drought Contingency Plan
  - The preliminary Drought Contingency Plan is located in Attachment C, pages 17-25, and is being submitted to the TCEQ for approval. Once approved, the drought contingency plan will be amended into our tariff.
4. Sanitary Control Easement
  - Attachment D, pages 27-28, contains a copy of the filed sanitary control easement.
5. Need to use commission form 20699 for CSI.
  - Attachment E, pages 30-31, is TCEQ Form 20699 that would be used for a customer service inspection when needed. Currently, we have not had to perform a customer service inspection for this system.

If you have any questions or concerns, feel free to contact us.

Sincerely,

Jamie Kindred  
Compliance Associate  
Gulf Utility Service, Inc.





# Public Water System Revised Total Coliform Rule Sample Siting Plan

PWS Name	Lakeview N Marshall Oaks
PWS ID	0260010
Date	May 16, 2016

- System is submitting SOP to specify either alternative fixed locations or criteria for selecting repeat sampling sites on a situational basis other than collecting repeat samples at sites upstream and downstream of the original routine sampling site.

*"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Name (Printed)	Jamie Kindred	Title	Compliance Associate
Signature		Date	12/8/16

# Introduction

## Purpose of the Sample Siting Plan

As per the revisions under the Revised Total Coliform Rule (RTCR), every public water system must develop and maintain sampling sites for their routine as well as their repeat sample locations. The plan shows where a system intends to complete their repeat requirements in the event of a distribution system positive. Completing this plan will help a system to comply with the monitoring requirements of the *Drinking Water Standards Governing Drinking Water Quality and Reporting Requirements for Public Water Systems* (30 TAC 290 Subchapter F). The plan is a system specific document which demonstrates that the monitoring performed by the system is representative of the water distributed to consumers and is consistent with regulatory requirements.

## How to Use

All applicable sections in the form should be completed to reflect the water system and the monitoring conducted for compliance purposes. The form has all of the elements to create a complete sample siting plan. The form can be saved to the user's computer, and e-mailed to TCEQ once completed.

## Submission to TCEQ

All public water systems must submit a copy of the sample siting plan and distribution map for review upon development and revisions.

Submit one (1) copy of the complete Sample Siting Plan to:

Texas Commission on Environmental Quality  
Attn: Drinking Water Quality Team  
Public Drinking Water Section, Mail Code 155  
PO Box 13087  
Austin, TX 78711-3087

OR

[TCRDATA@tceq.texas.gov](mailto:TCRDATA@tceq.texas.gov)

## Revisions

Be sure to submit any changes to the sample siting plan to the TCEQ. Revisions may be necessary depending on sites previously listed no longer being available to sample.

**Drinking Water Watch: This database is viewable by the public and has important information pertinent to a system's Sample Siting Plan such as contact information, population served, and sample schedules. Be sure to verify that the information is correct by searching for your water system and updating TCEQ accordingly. Please contact the TCEQ inventory team if you wish to update the data:**

E-mail: [PWSINVEN@tceq.texas.gov](mailto:PWSINVEN@tceq.texas.gov)

Phone: (512) 239-4691

# Revised Total Coliform Rule

## I. Total Coliform Sampling Protocol

It is important that systems collect samples correctly; otherwise, they may be contaminated and the results used to determine the condition of the water system could be inaccurate. The total coliform rule regulatory guidance (RG-421 'Coliform Sampling for Public Water Systems') includes a standard sampling protocol that every water system must adhere to when collecting samples for compliance.

## II. Routine Monitoring Requirements

Minimum required number of Coliform Samples per month =

- ~ Systems must develop a written sample siting plan that identifies sampling sites and a sample collection schedule that are representative of water throughout the distribution system.
- ~ A public water system must collect samples at regular time intervals throughout the month, except systems using only groundwater and serving 4,900 or fewer people who may collect all required samples on a single day if they are taken from different sites. It is recommended that samples be taken early in the week and early in the month, so repeat sampling can be conducted before the end of the month.
- ~ All systems should have at least five "routine" (original routine (OR)) sample locations listed for rotation purposes, unless the system has less than five sample locations (e.g., some convenience stores, restaurants, and small business parks, etc.).
- ~ Sampling locations shall be representative of the entire distribution.
- ~ All public water systems must monitor the disinfectant residual concentration each time that a bacteriological sample is collected.

## Mapping Requirements

Under the RTCR, all public water systems must develop a written Sample Siting Plan that identifies sampling sites and a sample collection schedule that are representative of water throughout the distribution system **not later than March 31, 2016**. The Sample Siting Plan is subject to TCEQ review and revision. In addition, Texas Administrative Code (TAC) §290.46 requires that all public water systems maintain an accurate and up-to-date map of their distribution system. To determine that sample sites are representative of water throughout the distribution system under the RTCR, all public water systems must develop a map of their distribution system and include it with their Sample Siting Plan. The RTCR distribution system map must contain the following applicable location information:

- "Routine" (OR) RTCR Sample Sites (*Repeat* sites not required);
- Distribution water mains and sizes;
- Entry Point Source Locations (e.g., well source and/or surface water or groundwater under the influence (GUI) water treatment entry points into the distribution system, interconnection with other systems);
- \*Water Storage Facilities;
- \*Pressure Plane Boundaries.

**\*If a system has only one pressure plane or does not have any water storage facilities, please indicate this information on the map.**

### III. Repeat Monitoring Requirements

- ~ The system must collect no fewer than three repeat samples for each total coliform-positive sample found. The three repeat samples are referred to as a "Repeat Sample Set".
- ~ Systems must collect at least one repeat sample from the sampling tap where the **original** total coliform-positive sample was taken, and at least one repeat sample at a tap within five service connections **upstream** and at least one repeat sample at a tap within five service connections **downstream** of the original sampling site.
- ~ If a total coliform-positive sample is at the end of the distribution system, or one service connection away from the end of the distribution system, the system must still take all required repeat samples.
- ~ A system may elect to specify either alternative fixed locations or criteria for selecting repeat sampling sites on a situational basis in a standard operating procedure (SOP) included with the sample siting plan.
- ~ Every public water system must specify and sample three repeat locations, regardless of how many routine samples are taken. Systems may specify more than three locations if approved by the TCEQ.
- ~ If a groundwater system serves a total of 1,000 people or less, an entry point sample can be used as the third repeat location. A triggered source monitoring (TSM) sample can double as the third repeat sample if the groundwater system only operates one well.
- ~ Standard Operating Procedure (SOP) Upstream/Downstream - Systems that collect repeat samples at a tap from the original total coliform-positive sample location, and at a tap within five service connections upstream, and at a tap within five service connections downstream of the original sampling site, shall sign and agree to follow the enclosed upstream and downstream SOP as described in Section VII of this sample siting plan.
- ~ Standard Operating Procedure (SOP) Alternative Repeat Sample Sites - A system that elects to specify either alternative fixed locations or criteria for selecting repeat sampling sites on a situational basis must develop and submit a written SOP for review and approval of alternative sample sites. (Please note: Systems that choose to pursue this repeat monitoring option must ensure that they check the "box" on the cover page of this document. TCEQ will provide written notification to the system that their SOP has been approved.)

### IV. Routine and Repeat Monitoring Location Table

#### RTRC Sample Siting Plan

#### Routine and Repeat Sampling Locations\*

Original Routine (OR) Sample Site: 1401 Lakeview Drive

UPSite1: 1303 Lakeview	DN Site1: 1516 Lakeview
UPSite2: 285 N. Lakeview	DN Site2: 895 Lakeview
UPSite3: 1110 Lakeview	DN Site3: 208 Bass Lake
UPSite4:	DN Site4:
UPSite5:	DN Site5:

Original Routine (OR) Sample Site: 1020 Lakeview Drive

UPSite1: 1008 Lakeview	DNSSite1: 1110 Lakeview
UPSite2: 162 Oak Ridge	DNSSite2: 285 Lakeview
UPSite3: 199 Oak Ridge	DNSSite3: 1303 Lakeview
UPSite4:	DNSSite4:
UPSite5:	DNSSite5:

Original Routine (OR) Sample Site: 1008 Lakeview Drive

UPSite1: 1020 Lakeview	DNSSite1: 896 Lakeview
UPSite2: 162 Oak Ridge	DNSSite2: 895 Lakeview
UPSite3: 199 Oak Ridge	DNSSite3: 803 Lakeview
UPSite4:	DNSSite4:
UPSite5:	DNSSite5:

Original Routine (OR) Sample Site: 895 Lakeview Drive

UPSite1: 1008 Lakeview	DNSSite1: 896 Lakeview
UPSite2: 162 Oak Ridge	DNSSite2: 803 Lakeview
UPSite3: 199 Oak Ridge	DNSSite3:
UPSite4:	DNSSite4:
UPSite5:	DNSSite5:

Original Routine (OR) Sample Site: 213 Oak Ridge

UPSite1: 162 Oak Ridge	DNSSite1: 285 Lakeview
UPSite2: 199 Oak Ridge	DNSSite2: 1303 Lakeview
UPSite3: 207 Oak Ridge	DNSSite3: 1401 Lakeview
UPSite4:	DNSSite4:
UPSite5:	DNSSite5:



**\* Routine sample locations:**

A **Community** public water system must develop a list of routine sample sites that are representative of water throughout the entire distribution system. The sample sites must be identified by **street address**.

A **Non-Transient Non-Community** or **Transient Non-Community** public water system must develop a list of routine sample sites that are representative of water throughout the entire distribution system. The sample sites must be identified by **specific facility location** (i.e., outside tap west wall near front door, raw well tap, inside tap, etc.) **OR any applicable facility address**.

**\* Repeat sampling locations:** A public water system must specify sampling addresses for locations within five connections upstream *and* downstream of the original sample address.

OR = original routine sample site

When a routine sample is positive, a repeat sample must be collected at the original routine sample site in addition to the upstream and downstream sample sites.

UPSite1-5 = upstream connections of original routine address

DNSite1-5 = downstream connections of original routine address

## V. RTCR Sampling Schedule

- ~ A public water system must collect samples at regular time intervals throughout the month, except systems using only groundwater and serving 4,900 or fewer people who may collect all required samples on a single day if they are taken from different sites.
- ~ Please provide a written description in the text box below to explain the system's sample collection schedule (e.g., at either regular time intervals throughout the month or on a single day) which is representative of water throughout the distribution system.

This facility has one monthly sample taken during the first week of the month (weather permitting) allowing for any repeat sampling to be taken before the end of the month.

## VI. Groundwater Source Monitoring Sites

- ~ Sample locations necessary to meet the requirements of the Ground Water Rule (GWR) must be reflected in the Sample Siting Plan. Public Water Systems must include their TCEQ Assigned Well Source Identification Number (i.e., G0000000A), sample location, and whether or not the Well(s) Entry Point (treated) is used as a **repeat** monitoring location **OR** if the Well (raw) is used as a **repeat** location to satisfy Triggered Source Monitoring (TSM) requirements under the GWR.

**Reminder:** If a groundwater system serves a total of 1,000 people or less, an entry point sample can be used as the third repeat location. A triggered source monitoring (TSM) sample can double as the third repeat sample if the groundwater system only operates one well.

### Groundwater Wells

Assigned Source ID	Sample Location	Used as Repeat Sample Location?
--------------------	-----------------	---------------------------------

G0260010A	980 Lakeview Drive	<input type="checkbox"/> Yes
-----------	--------------------	------------------------------

[Click here to add one additional well](#)

[Click here to add five additional wells](#)

**VII. Standard Operating Procedure (SOP) - Upstream / Downstream**

~ The following SOP is required for public water systems that include repeat samples within five service connections Upstream and Downstream of the original routine sample site in their "Repeat Sample Set".

Once a system receives a total coliform-positive (TC+) sample result from the Original Routine (OR) Sample, the system must collect at least one repeat sample from the sampling tap where the original total coliform-positive sample was taken, and at least one repeat sample at a tap within five service connections upstream and at least one repeat sample at a tap within five service connections downstream of the original sampling site (**Repeat Sample Set**). If a total coliform-positive sample is at the end of the distribution system, or one service connection away from the end of the distribution system, the system must still take all required repeat samples.

This SOP stipulates the repeat sampling process when conditions exist that prevent the collection of a repeat sample from one of the listed upstream or downstream sample sites. The system may collect their repeat samples at one of the alternative upstream or downstream sample sites as listed in the RTCR Sample Siting Plan. For example, when UPSite 1 or DNSite 1 is determined by the system to be unacceptable due to sample site conditions, then a sample may be collected from one of the alternative UPSite 2 - 5 or DNSite 2 - 5 sample sites.

Specifically, systems may collect their repeat samples from any of the listed UPSite 1 - 5 or DNSite 1 - 5 sample sites and are not required to select their repeat sites in sequential order. For example, systems may include in their repeat sample set a sample from UPSite 2 and DNSite 5.

By signing the cover page of this RTCR Sample Siting Plan, systems that choose to include repeat sample sites from upstream and downstream sample sites in their Repeat Sample Set agree to follow this SOP.

# Lakeview N Marshall Oaks

Water Plant

★ All items

Sample Site #1

📍 All items

Sample Site #2

📍 All items

Sample Site #3

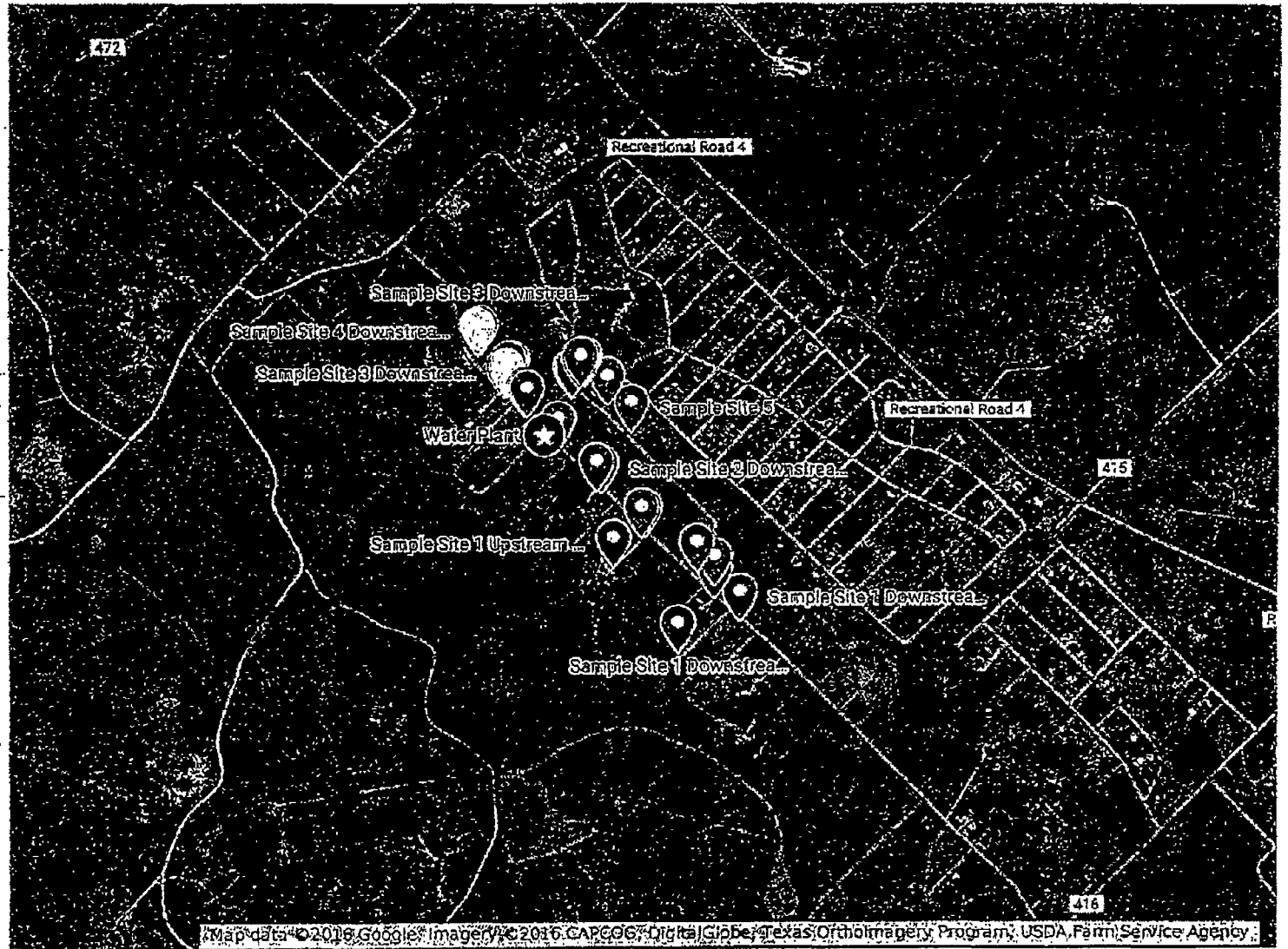
📍 All items

Sample Site #4

All items

Sample Site #5

📍 All items



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For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

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Certified Mail Fee

\$ 3.10

Extra Services & Fees (check box, add fee as appropriate)

- Return Receipt (hardcopy) \$ 2.70
- Return Receipt (electronic) \$ \_\_\_\_\_
- Certified Mail Restricted Delivery \$ \_\_\_\_\_
- Adult Signature Required \$ \_\_\_\_\_
- Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postage

\$ 0.68

Total Postage and Fees

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Sent To

TCER POW MC 155

Street and Apt. No., or PO Box No.

PO Box 130A7

City, State, ZIP+4®

Austin, TX 78711

Lakeview N.  
Marshall  
RT <sup>Postmark</sup> AR  
Here  
12-12-16

7016 1370 0000 1949 7382  
9102 9102 0000 1949 7382

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

Agent

Addressee

B. Received by (*Printed Name*)

C. Date of Delivery

delivery address different from item 1?  Yes  
YES, enter delivery address below:  No

TCEQ Drinking Water Quality Team  
PDW Section, MC 155  
PO Box 13087  
Austin, TX 78711-3087



9590 9402 2076 6132 2285 15

2 Article Number (Transfer from service label)

7016 1370 0000 1949 7382

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail-Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

1 Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

USPS TRACKING #



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 2076 6132 2285 15

**United States  
Postal Service**

• Sender, Please print your name, address, and ZIP+4® in this box •

Gulf Utility Service, Inc.  
P.O. Box 691008  
Houston, TX, 77269  
281-355-1312

*Lakeview N. Marshall ETCR*

*LR*

## SANITARY CONTROL EASEMENT

Melissa McMillan; Grantor  
1020 Lakeview Dr.  
Lakeview Subdivision  
Burlison County, Texas

Brazos Valley Septic & Water, Inc; Grantee  
3033 Cain Rd. College Station, TX 77845

### **SANITARY CONTROL EASEMENT:**

#### **Purpose, Restrictions, and Uses of Easement:**

1. The purpose of this easement is to protect the water supply of the well described and located below by means of sanitary control.
2. The construction and operation of underground petroleum and chemical storage tanks and liquid transmission pipelines, stock pens, feedlots, dump grounds, privies, cesspools, septic tank or sewage treatment drain fields, improperly constructed water well of any depth, and all other construction or operation that could create an unsanitary condition within, upon, or across the property subject to this easement are prohibited within this easement. For the purpose of the easement, improperly constructed water wells are those wells which do not meet the surface and subsurface construction standards for a public water supply well.
3. The construction of tile or concrete sanitary sewers, sewer appurtenances, septic tanks, storm sewers, and cemeteries is specifically prohibited within a 50 foot radius of the water well described and located below.
4. This easement permits the construction of homes or buildings upon the grantor's property as long as all items in Restrictions Nos. 2 and 3 are recognized and followed.
5. This easement permits normal farming and ranching operations, except livestock shall not be allowed within 50 feet of the water well.

#### **Property Subject to Easement:**

All that area located within 150-foot radius of the water well located at approximately 1020 Lakeview Dr, Lakeview North Subdivision, Burlison County, Texas

#### **Term:**

This easement shall run with the land and shall be binding on all parties and persons claiming under the Grantor for a period of two years from the date that this easement is recorded.

#### **Enforcement:**

Enforcement of this easement shall be proceedings at law or in equity against any person or person violating or attempting to violate the restrictions in this easement, either to restrain the violation or to recover damages.

**Invalidation**

Invalidation of any one of these restriction or uses (covenants) by a judgment or court order shall not affect any of the other provisions of this easement, which shall remain in full force and effect.

FOR AND IN CONSIDERATION, of the sum of One Dollar (\$1.00) and for the other good and valuable consideration paid by the Grantee to the Grantor, the receipt of which is hereby acknowledged, the Grantor does hereby grant and convey to Grantee and to its successors and assigns the sanitary control easement described in this easement.

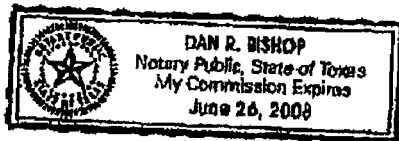
GRANTOR Melissa McMillan  
Melissa McMillan

**ACKNOWLEDGMENT**

STATE OF TEXAS  
COUNTY OF BRAZOS

Before me, the undersigned authority on this day of January 30, 2008, personally appeared Melissa McMillan known to me to be the person whose name is subscribed to the foregoing instrument and acknowledge to me that executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 30 day of January, 2008



Dan R Bishop  
Notary Public in and for the State of Texas

Filed for Record in:  
Brazos County

On: Feb 01, 2008 at 02:51P

As an Official Public Record

Document Number: 00000467

Amount 20.00

Receipt Number - 54880

By:  
Sharon Burgess

STATE OF TEXAS COUNTY OF BRAZOS  
I hereby certify that this instrument  
was filed on the date and time  
stamped hereon by me and was duly  
recorded in the volume and page of  
the named records of:  
Brazos County  
As stamped hereon by me.

Feb 01, 2008

Honorable Anne L. Schielack  
County Clerk





**Texas Commission on  
Environmental Quality**

**DROUGHT CONTINGENCY PLAN  
FOR**

**Lakeview N. Marshall Oaks**

**P.O. Box 691008, Houston, TX 77269**

**CCN# 12252**

**PWS ID# TX0260010**

**December 12, 2016**

**Section 1 Declaration of Policy, Purpose, and Intent**

In cases of extreme drought, periods of abnormally high usage, system contamination, or extended reduction in ability to supply water due to equipment failure, temporary restrictions may be instituted to limit non-essential water usage. The purpose of the Drought Contingency Plan is to encourage customer conservation in order to maintain supply, storage, or pressure or to comply with the requirements of a court, government agency or other authority.

**Please note:** Water restriction is not a legitimate alternative if a water system does not meet the Texas Commission on Environmental Quality's (TCEQ) capacity requirements under normal conditions or if the utility fails to take all immediate and necessary steps to replace or repair malfunctioning equipment.

I, Jamic Kindred, being the responsible official for Lakeview N. Marshall Oaks, request a minor tariff amendment to include the enclosed **Drought Contingency Plan**.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

## Section 2      Public Involvement

Opportunity for the public to provide input into the preparation of the Plan was provided by:

Bill insert inviting comment- Insert attached.

## Section 3      Public Education

Lakeview N. Marshall Oaks will periodically provide the public with information about the Plan, including information about the conditions under which each stage of the Plan is to be initiated or terminated and the drought response measures to be implemented in each stage.

Drought plan information will be provided by:

1. Utility Bill Inserts
2. Posted to our operating website at [www.gulfutility.net](http://www.gulfutility.net)

## Section 4      Coordination with Regional Water Planning Groups

The service area for Lakeview N. Marshall Oaks is located within Regional Water Planning Group (RWPG) Brazos G Regional Water Planning Group.

Lakeview N. Marshall Oaks has mailed a copy of this Plan to the RWPG.

## Section 5 Notice Requirements

Written notice will be provided to each customer prior to implementation or termination of each stage of the water restriction program. Mailed notice must be given to each customer 72 hours prior to the start of water restriction. If notice is hand delivered, the utility cannot enforce the provisions of the plan for 24 hours after notice is provided. The written notice to customers will contain the following information:

1. the date restrictions will begin,
2. the circumstances that triggered the restrictions,
3. the stages of response and explanation of the restrictions to be implemented, and
4. an explanation of the consequences for violations.

The utility must notify the TCEQ by telephone at (512) 239-4691, or electronic mail at [watermon@tceq.state.tx.us](mailto:watermon@tceq.state.tx.us) prior to implementing Stage III and must notify in writing the Public Drinking Water Section at MC - 155, P.O. Box 13087, Austin, Texas 78711-3087 within five (5) working days of implementation including a copy of the utility's restriction notice. The utility must file a status report of its restriction program with the TCEQ at the initiation and termination of mandatory water use restrictions (i.e., Stages III and IV).

## Section 6 Violations

First violation - The customer will be notified by written notice of their specific violation

Subsequent violations:

- a. After written notice, the utility may install a flow restricting device in the line to limit the amount of water which will pass through the meter in a 24-hour period. The utility may charge the customer for the actual cost of installing and removing the flow restricting device, not to exceed \$150.00.
- b. After written notice, the utility may discontinue service at the meter for a period of seven (7) days, or until the end of the calendar month, whichever is LESS. The reconnect fee of the utility will apply for restoration of service

## Section 7 Exemptions or Variances

The utility may grant any customer an exemption or variance from the drought contingency plan for good cause **upon written request**. A customer who is refused an exemption or variance may appeal such action of the utility in writing to the Texas Commission on Environmental Quality. The utility will treat all customers equally concerning exemptions and variances, and shall not discriminate in granting exemptions and variances. No exemption or variance shall be retroactive or otherwise justify any violation of this Plan occurring prior to the issuance of the variance.

## Section 8 Response Stages

Unless there is an immediate and extreme reduction in water production, or other absolute necessity to declare an emergency or severe condition, the utility will initially declare Stage I restrictions. If, after a reasonable period of time, demand is not reduced enough to alleviate outages, reduce the risk of outages, or comply with restrictions required by a court, government agency or other authority, Stage II may be implemented with Stage III to follow if necessary.

### STAGE I - CUSTOMER AWARENESS

Stage I will begin:

Every April 1<sup>st</sup>, the utility will mail a public announcement to its customers. No notice to TCEQ required.

Stage I will end:

Every September 30<sup>th</sup>, the utility will mail a public announcement to its customers. No notice to TCEQ required.

Utility Measures:

This announcement will be designed to increase customer awareness of water conservation and encourage the most efficient use of water. A copy of the current public announcement on water conservation awareness shall be kept on file available for inspection by the TCEQ.

Voluntary Water Use Restrictions:

Water customers are requested to voluntarily limit the use of water for non-essential purposes and to practice water conservation.

### STAGE II - VOLUNTARY WATER CONSERVATION:

**Target: Achieve a 10 percent reduction in daily water demand.**

The water utility will implement Stage 2 when any one of the selected triggers is reached:

Supply-Based Triggers:

Annual water use equals 80 % of well permit/Water Right/purchased water contract amount

Demand- or Capacity-Based Triggers:

Total daily demand as % of storage capacity 85 %

**Upon initiation and termination of Stage II, the utility will mail a public announcement to its customers. No notice to TCEQ required.**

Requirements for Termination:

Stage II of the Plan may end when all of the conditions listed as triggering events have ceased to exist for a period of three (3) consecutive days. Upon termination of Stage II, Stage I becomes operative.

Utility Measures:

Visually inspect lines and repair leaks on a daily basis. Monthly review of customer use records and follow-up on any that have unusually high usage. Reduce flushing of water mains to dead end flushings and water quality issues.

Voluntary Water Use Restrictions:

1. Restricted Hours: Outside watering is allowed daily, but only during periods specifically described in the customer notice; between 10:00 p.m. and 5:00 a.m. for example; or
2. Restricted Days/Hours: Water customers are requested to voluntarily limit the irrigation of landscaped areas with hose-end sprinklers or automatic irrigation systems. Customers are requested to limit outdoor water use to **Mondays for water customers with a street address ending with the numbers 1, 2, or 3, Wednesdays for water customers with a street address ending with the numbers 4, 5, or 6, and Fridays for water customers with a street address ending with the numbers 7, 8, 9, or 0.** Irrigation of landscaped areas is further limited to the hours of 12:00 midnight until 10:00 a.m. and between 8:00 p.m. and 12:00 midnight on designated watering days. However, irrigation of landscaped areas is permitted at anytime if it is by means of a hand-held hose, a faucet-filled bucket or watering can of five (5) gallons or less, or drip irrigation system; or
3. Other uses that waste water such as water running down the gutter.

**STAGE III - MANDATORY WATER USE RESTRICTIONS:**

**Target: Achieve a 25 percent reduction in daily water demand.**

The water utility will implement Stage III when any one of the selected triggers is reached:

Supply-Based Triggers

Annual water use equals 85 % of well permit/Water Right/purchased water contract amount.

Demand- or Capacity-Based Triggers

Total daily demand as % of storage capacity 90 %

**Upon initiation and termination of Stage III, the utility will mail a public announcement to its customers. Notice to TCEQ required.**

Requirements for Termination:

Stage III of the Plan may end when all of the conditions listed as triggering events have ceased to exist for a period of three (3) consecutive days. Upon termination of Stage III, Stage II becomes operative.

Utility Measures:

Visually inspect lines and repair leaks on a regular basis. Flushing is prohibited except for dead end mains.

Mandatory Water Use Restrictions:

The following water use restrictions shall apply to all customers.

1. Irrigation of landscaped areas with hose-end sprinklers or automatic irrigation systems shall be limited to Mondays for water customers with a street address ending with the numbers 1, 2, or 3, Wednesdays for water customers with a street address ending with the numbers 4, 5, or 6, and Fridays for water customers with a street address ending with the numbers 7, 8, 9, or 0. Irrigation of landscaped areas is further limited to the hours of 12:00 midnight until 10:00 a.m. and between 8:00 p.m. and 12:00 midnight on designated watering days. However, irrigation of landscaped areas is permitted at anytime if it is by means of a hand-held hose, a faucet-filled bucket or watering can of five (5) gallons or less, or drip irrigation system.
2. Use of water to wash any motor vehicle, motorbike, boat, trailer, airplane or other vehicle is prohibited except on designated watering days between the hours of 12:00 midnight and 10:00 a.m. and between 8:00 p.m. and 12:00 midnight. Such washing, when allowed, shall be done with a hand-held bucket or a hand-held hose equipped with a positive shutoff nozzle for quick rinses. Vehicle washing may be done at any time on the immediate premises of a commercial car wash or commercial service station. Further, such washing may be exempted from these regulations if the health, safety, and welfare of the public are contingent upon frequent vehicle cleansing, such as garbage trucks and vehicles used to transport food and perishables.
3. Use of water to fill, refill, or add to any indoor or outdoor swimming pools, wading pools, or a Jacuzzi® type pool are prohibited except on designated watering days between the hours of 12:00 midnight and 10:00 a.m. and between 8:00 p.m. and 12:00 midnight.
4. Operation of any ornamental fountain or pond for aesthetic or scenic purposes is prohibited except where necessary to support aquatic life or where such fountains or ponds are equipped with a recirculation system.
5. Use of water from hydrants or flush valves shall be limited to maintaining public health, safety, and welfare.
6. Use of water for the irrigation of golf courses, parks, and green belt areas are prohibited except by hand-held hose and only on designated watering days between the hours 12:00 midnight and 10:00 a.m. and between 8:00 p.m. and 12:00 midnight.
7. The following uses of water are defined as non-essential and are prohibited:

- a. wash down of any sidewalks, walkways, driveways, parking lots, tennis courts, or other hard-surfaced areas;
- b. use of water to wash down buildings or structures for purposes other than immediate fire protection;
- c. use of water for dust control;
- d. flushing gutters or permitting water to run or accumulate in any gutter or street;
- e. failure to repair a controllable leak(s) within a reasonable period after having been given notice directing the repair of such leak(s); and
- f. any waste of water.

**STAGE IV - CRITICAL WATER USE RESTRICTIONS:**

**Target: Achieve a 50 percent reduction in daily water demand.**

The water utility will implement Stage IV when any one of the selected triggers is reached:

**Supply-Based Triggers:**

Annual water use equals 90 % of well permit/Water Right/purchased water contract amount

**Demand- or Capacity-Based Triggers: (check at least one and fill in the appropriate value)**

Total daily demand as % of storage capacity 95 %

**Upon initiation and termination of Stage IV, the utility will mail a public announcement to its customers. Notice to TCEQ required.**

**Requirements for Termination:**

Stage IV of the Plan may be rescinded when all of the conditions listed as triggering events have ceased to exist for a period of three (3) consecutive days. Upon termination of Stage IV, Stage III becomes operative.



Operational Measures:

The utility shall visually inspect lines and repair leaks on a daily basis. Flushing is prohibited except for dead end mains and only between the hours of 9:00 p.m. and 3:00 a.m. Emergency interconnects or alternative supply arrangements shall be initiated. All meters shall be read as often as necessary to insure compliance with this program for the benefit of all the customers.

Mandatory Water Use Restrictions: (all outdoor use of water is prohibited)

1. Irrigation of landscaped areas is absolutely prohibited.
2. Use of water to wash any motor vehicle, motorbike, boat, trailer, airplane or other vehicle is absolutely prohibited.

**SYSTEM OUTAGE or SUPPLY CONTAMINATION**

Notify TCEQ Regional Office immediately.

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, contact us at 512-239-3282.



## Dead End Flushing Procedure

### I. Goal

The purpose of the flushing program is to provide a safe high quality water supply to the customers. Debris can enter and accumulate in a water distribution system. Disinfectant residuals can deplete due to low usage and disinfectants may combine with materials in the system to form undesirable byproducts. Each of these situations may be corrected by an adequate flushing program.

### II. Flushing Points

Each water system has its own designated flushing points that will be assigned when a flushing work order has been created.

### III. Guideline:

1. Start at or near a source of supply and work outward into the distribution system.
2. Open the fire hydrant or blow-off valve slowly
3. Direct flushing water away from traffic, pedestrians and private property.
4. Avoid damage to lawns and yards by the use of a motor lid to protect the grassy area that would be affected
5. Avoid flooding, which can cause traffic problems
6. Assure that the system pressure in nearby areas do not drop below 138 kPa (20 psi)
7. Record all pertinent data regarding the flushing operation in the mobile app
8. Note any all repair work that is needed
9. When estimating gallons used please use the following calculations

Fire Hydrants: 100 Gals per foot per min flushed. (Example: If a hydrant is flows 3 ft. out when flushed for 15 mins it would have flushed approx. 4500 gallons)

Blow Offs: 2" pipes not reduced or expanded produce 300 gallons per minute at 4-5ft of distance

### IV. Plan Of Action

1. A systematic flushing of the entire distribution system will be conducted annually or more often if required to maintain water quality. Individual sites will be flushed as needed. The flushing program will ensure that:
  - a. Dead end/ low usage mains are flushed monthly
  - b. Drinking water standards are met
  - c. Sediment and air are removed
  - d. The required Free/Total chlorine residual is maintained
2. In some instances specific areas of distribution system may need to be flushed more frequently to correct problems. These problems may include but are not limited to the following:
  - a. Air in the lines
  - b. Sediment in the lines
  - c. Maintaining the Free/Total Chlorine Residuals
  - d. Taste, odor or color problems

3. Flushing will be performed by Licensed Operators and Field Technicians
4. Following line repairs, main lines will be flushed to remove air and sediment from the repaired section of the line. If disinfection is necessary the line will be flushed to remove the high chlorine content. During flushing, water containing high chlorine concentrations should be flushed on relatively flat ground so as not to contaminate a receiving stream or body of water.
5. Flushing should continue until the following conditions are met:
  - a. The hydrant/blow off has been flushed for a 15 minutes
  - b. The Free/Total chlorine residuals reaches a min of 1.0 mg/l
  - c. No air is detected
  - d. Water is clear with no visible sediment
  - e. No object able taste or odor remains

\*\*\* Note: When flushing hydrants or blow offs that are in a grassy area that can be affected by the water a meter box lid will be placed in that area to prevent any damage to yard.

#### V. Record Keeping

Records of each flushing will be maintained on on a cloud based company website and in Kardia. These records will include the following:

- a. Water System Name
- b. Date
- c. Time Start
- d. Time Finished
- e. Blow off/ Hydrant Location
- f. Starting Condition
- g. Gallons Used
- h. The Free/Total residual after flushing
- i. Person responsible



Texas Commission on Environmental Quality

Customer Service Inspection Certificate

Form TCEQ-20699 - Instructions



General Instructions:

The purpose of form TCEQ-20699 is to certify the identification and prevention of cross connections, potential contaminant hazards, and illegal lead materials as per *Title 30 of the Texas Administrative Code(30 TAC) 290.46(j)(4)*. The form can be completed one of two ways:

1. The form can be printed and completed manually, or;
2. The form can be completed electronically through an electronic medium (tablet, laptop computer, etc.).  
The yellow areas on the form can be completed electronically.

*NOTE: The form is intended to be completed on-site while the inspection is occurring. If the form is completed electronically, the electronic device must also be on-site for proper use of this form.*

The form must be printed and signed by the Inspector that performed the work. The hardcopy original or a copy must be provided to the Public Water System (PWS) for record keeping purposes as specified in *30 TAC 290.46(f)(3)(E)(iv)*.

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Specific Instructions:

Please follow these instructions when completing Form TCEQ-20699:

1. Check boxes: If completing the form electronically, all check boxes are highlighted in yellow and can be selected to make the desired indication. Selecting a box will insert an "X" in the box.
2. Remarks: The "Remarks" section of the form is expandable, which means your final report can be more than one page. Make sure to include all pages when submitting to the local water purveyor.

Texas Commission on Environmental Quality  
Customer Service Inspection Certificate

Name of PWS:	
PWS ID #:	
Location of Service:	

Reason for Inspection:    New construction .....  †  
                                   Existing service where contaminant hazards are suspected .....  †  
                                   Major renovation or expansion of distribution facilities .....  †

I \_\_\_\_\_, upon inspection of the private water distribution facilities connected to the aforementioned public water supply do hereby certify that, to the best of my knowledge:

Compliance	Non-Compliance		
† <input type="checkbox"/>	<input type="checkbox"/>	(1)	No direct connection between the public drinking water supply and a potential source of contamination exists. Potential sources of contamination are isolated from the public water system by an air gap or an appropriate backflow prevention assembly in accordance with Commission regulations.
† <input type="checkbox"/>	<input type="checkbox"/>	(2)	No cross-connection between the public drinking water supply and a private water system exists. Where an actual air gap is not maintained between the public water supply and a private water supply, an approved reduced pressure principle backflow prevention assembly is properly installed and a service agreement exists for annual inspection and testing by a certified backflow prevention assembly tester.
† <input type="checkbox"/>	<input type="checkbox"/>	(3)	No connection exists which would allow the return of water used for condensing, cooling or industrial processes back to the public water supply.
† <input type="checkbox"/>	<input type="checkbox"/>	(4)	No pipe or pipe fitting which contains more than 8.0% lead exists in private water distribution facilities installed on or after July 1, 1988 and prior to January 4, 2014.
† <input type="checkbox"/>	<input type="checkbox"/>	(5)	Plumbing installed after January 4, 2014 bears the expected labeling indicating ≤0.25% lead content. If not properly labeled, please provide written comment.
† <input type="checkbox"/>	<input type="checkbox"/>	(6)	No solder or flux which contains more than 0.2% lead exists in private water distribution facilities installed on or after July 1, 1988.

I further certify that the following materials were used in the installation of the private water distribution facilities:

Service lines:    Lead †     Copper †     PVC †     Other †   
 Solder:            Lead †     Lead Free     Solvent Weld †     Other †

I recognize that this document shall become a permanent record of the aforementioned Public Water System and that I am legally responsible for the validity of the information I have provided.

Remarks:	

Signature of Inspector:	Registration Number:
Title:	Type of Registration:
Date:	

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX0210042 (7 digit ID)

Name of PWS: Lakewood Estates

Date of last TCEQ compliance inspection: 11/14/2018 (attach TCEQ letter)

Subdivisions served: Lakewood Estates

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit *submitted* to TCEQ: \_\_\_\_\_

23. List the number of *existing* connections, by meter/connection type, to be affected by the proposed transaction:

Water			Sewer	
	Non-metered		2"	Residential
80	5/8" or 3/4"		3"	Commercial
	1"		4"	Industrial
	1 1/2"		Other	Other
Total Water Connections:			80	Total Sewer Connections:

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?  
 No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_  
 Water: \_\_\_\_\_  
 Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?  
 No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the Transferee?  
 No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?  
 No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part G: Mapping & Affidavits**

**ALL applications require mapping information to be filed in conjunction with the STM application. Read question 29 A and B to determine what information is required for your application.**

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application:

1. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.

Jon Niemann, *Chairman*  
Emily Lindley, *Commissioner*  
Toby Baker, *Executive Director*



PWS\_0210042\_CO\_20181114\_ACR

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 14, 2018

Ms. Jamie Kindred, Regulatory Compliance Manager  
Gulf Utility Service, Inc.  
PO Box 691008  
Houston, Texas 77269

Re: Lakewood Estates - PWS ID No. 0210042  
Review of Request for Alternative Capacity Requirement  
Brazos County, Texas  
RN 102677069 | CN 603827353

Dear Ms. Kindred,

On October 1, 2018, the Texas Commission on Environmental Quality (TCEQ) received your letter dated September 24, 2018, responding to the TCEQ letter dated September 14, 2018, which addressed your request for an alternative capacity requirement (ACR) for the Lakewood Estates public water system (PWS ID No. 0210042). ACRs are granted in accordance with the requirements specified in Title 30 of the Texas Administrative Code (30 TAC) §290.45(g). The regulations found in 30 TAC §290.45(b)(1)(C)(ii) require community groundwater public water systems (PWSs) serving 50 to 250 connections to comply with a total storage capacity of 200 gallons per connection. Your letter requested that only weekly-usage data be required for collection to support an ACR request for total storage capacity.

Per a conversation between you, Stephanie Escobar, Team Leader of the Technical Review and Oversight Team (TROT), and TROT staff on October 25, 2018, the ACR requirement to collect daily usage data for an ACR request is required by rule under 30 TAC §290.45(g)(1)(B). Because the Lakewood Estates system is required to collect weekly data per 30 TAC §290.46(f)(3)(A)(ii)(III), the approval of a temporary ACR allows the system to acquire the 36-months of daily usage data that is required by rule for us to review an ACR request. Therefore, we are **unable to approve your request to allow an ACR calculation using weekly-usage data for the Lakewood Estates system. Daily-usage data must be collected and submitted to the TCEQ TROT for a final review of your ACR request. This data must be submitted before your temporary ACR expires on January 14, 2021.**

During the conference call on October 25, 2018, you proposed the idea of utilizing remote data loggers to capture data at the meter remotely. We acknowledge that implementation of installing a data logger may take some time and may result in the 36-month collection of data to be completed after the temporary ACR expires. If an extension to this temporary ACR is required, please submit a written request to the TROT at the address listed at the end of this letter.



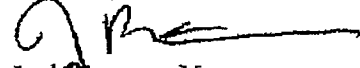
Ms. Jamie Kindred, Regulatory Compliance Manager  
Page 2 of 2  
November 14, 2018

If you have questions concerning this letter, or if we can be of additional assistance, please contact Cecilia Chavez at [Cecilia.Chavez@tceq.texas.gov](mailto:Cecilia.Chavez@tceq.texas.gov), by telephone at (512) 239-2446, or by correspondence at the following address:

Texas Commission on Environmental Quality  
Technical Review & Oversight Team (MC 159)  
P.O. Box 13087  
Austin, Texas 78711-3087

If you are unable to contact Ms. Chavez, please contact another member of the Technical Review and Oversight Team at 512-239-4691.

Sincerely,



Joel Klumpp, Manager  
Plan and Technical Review Section  
Water Supply Division  
Texas Commission on Environmental Quality

JPK/cc

Cc: Mr. Gregory P. Pappas, Owner, Nerro Supply, LLC, PO Box 691008  
Houston, TX 77269-1008

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

Regulated Entity/Site Name	Lakewood Estates	TCEQ Add. ID No. RN No. (optional)	0210052
Investigation Type	CCI Contact Made In-House (Y/N) <input checked="" type="checkbox"/> N	Purpose of Investigation	Routine Inspection
Regulated Entity Contact	Michael Williams	Telephone No.	113-494-7193
Title	Area Manager	Fax No.	

NOTICE: The information provided in this report is intended to provide the regulated entity with information that have appeared on the registration inspection report of the TCEQ and the regulated entity. It is not intended to be a notice of violation or enforcement. If violations or potential violations are discovered at the time of this report, the regulated entity will be contacted by telephone to be advised of any violations. The regulated entity will be provided a copy of a notice of violation if enforcement is one step removed from this investigation and more additional violations or potential violations are discovered. A violation of the terms of this investigation will be documented in the enforcement 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	Rule Citation (if known)	Description of Issue
	AV	290.109(c)(1)(b)	Collecting samples not in monitoring plan
	AV	290.46(f)(2)	Missing Distributing system map, Sanitary Control Equipment, and Effluent Contingency Plan

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

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

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

Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date
Anderson Miller Emerson Tuller	11/3/15	Michael Williams	11-3-15

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

Individuals are entitled to access and review their personal information in the registry and records of this agency. For more information, contact the Texas Public Information Act at 1-800-690-3282.

BT, in W. 5000, P.O. 31, Chantilly  
Toby E. Orr, Commissioner  
Lou Stettin, Commissioner  
Public Affairs & Executive Director



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 15, 2017

**CERTIFIED MAIL #7017 1450 0000 5039 2015  
RETURN RECEIPT REQUESTED**

Mr. Gregory Pappas, Manager  
Nerro Supply LLC  
P.O. Box 691008  
Houston, TX 77269

Re: Acceptance of Compliance Plan for:  
Lakewood Estates, Brazos County, Texas  
TCEQ ID No : RN102677069, PWS ID No.: 0210042

Dear Mr. Pappas:

The Texas Commission on Environmental Quality (TCEQ) Waco Regional Office has completed a review of the compliance plan and additional information that you submitted August 25, 2017 and October 26, 2017 for resolving the alleged violation dealing with inadequate total storage capacity. This alleged violation was noted during the investigation of the above-referenced facility conducted on November 3, 2016. The compliance plan with the additional information appears to identify necessary corrective action for the alleged violation. We will monitor your progress in implementing the corrective action. You should submit compliance documentation demonstrating the total storage capacity requirement has been met to our office by January 31, 2018. Please be advised, though, that if we determine during follow-up monitoring that you are not working towards compliance or the problem has escalated, further enforcement action will be considered.

The Texas Commission on Environmental Quality appreciates your assistance in this matter and anticipates that you will resolve the alleged violation as required in order to protect the State's environment. If you or members of your staff have any questions, please feel free to contact Mr. Hudson Tuller in the Waco Regional Office at (254) 751-0335.

Sincerely,

Richard Monreal  
Water Section Manager  
Waco Regional Office

RM/HT/gb

## Summary of Investigation Findings

LAKEWOOD ESTATES

Investigation #

1438736

Investigation Date: 11/20/2017

, BRAZOS COUNTY,

Additional ID(s): 0210042

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

Track No: 625073 Compliance Due Date: 01/31/2018

30 TAC Chapter 290.45(b)(1)(C)(ii)

**Alleged Violation:**

Investigation: 1371516

Comment Date: 11/30/2016

Failure to meet a total storage capacity of 200 gallons per connection.

Community water systems with 50 to 250 connections must meet a total storage capacity of 200 gallons per connection.

During the November 3, 2016 compliance investigation, it was noted that Lakewood Estates 11,000 gal ground water storage tank does not meet the total storage tank capacity requirement. Due to there being 78 active connections at least a 15,600 gal ground water storage tank is required.

Investigation: 1409347

Comment Date: 04/27/2017

Failure to meet a total storage capacity of 200 gallons per connection.

As of the April 27, 2017, file review investigation, no compliance documentation had been received from Nerro Supply LLC.

Investigation: 1438736

Comment Date: 09/26/2017

Failure to meet a total storage capacity of 200 gallons per connection.

**Recommended Corrective Action:** Submit documentation showing the public water supply provides at least 200 gallons per connection of storage capacity.

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

Track No: 625075

30 TAC Chapter 290.109(d)(1)(B)

**Alleged Violation:**

Investigation: 1371516

Comment Date: 11/30/2016

Failure to collect distribution coliform samples at locations specified in the monitoring plan.

Public water systems shall collect distribution coliform samples at locations specified in the system's monitoring plan.

During the November 3, 2016 compliance investigation, it was noted that none of the monthly distribution coliform samples were collected from locations specified in the monitoring plan.

Investigation: 1409347

Comment Date: 05/05/2017

Failure to collect distribution coliform samples at locations specified in the monitoring plan.

Monitoring requirements for microbial contaminants. Public water systems shall collect samples for total coliform, fecal coliform, E. coli (or other approved fecal indicator) at

**LAKWOOD ESTATES**

**Investigation # 1438736**

sampling sites and a sample collection schedule, as designated by the public water system, which are subject to review and revision as directed by the executive director. All compliance samples must be collected at sampling sites and a sample collection schedule that are representative of water throughout the distribution system and shall be reflected in the public water system's Sample Siting Plan and included with the public water system's monitoring plan in accordance with §290.121 of this title (relating to Monitoring Plans). All public water systems shall develop a written Sample Siting Plan as described in paragraph (6) of this subsection.

As of the April 27, 2017, file review investigation, no compliance documentation had been received from Nerro Supply LLC.

Investigation: 1438736

Comment Date: 12/07/2017

Failure to collect distribution coliform samples at locations specified in the monitoring plan.

**Resolution:** On August 25, 2017, the TCEQ Waco regional office recieved copies of the distribution coliform sample results for the months of November through January showing that coliform samples are being collected from the locations specified in the monitoring plan.

Track No: 625077

30 TAC Chapter 290.46(f)(2)

**Alleged Violation:**

Investigation: 1371516

Comment Date: 11/30/2016

Failure to provide water system records at the time of an inspection.

The public water system's operating records must be accessible for review during inspections and be available to the executive director upon request.

During the November 3, 2016 compliance investigation, it was noted that the following records were not provided: Distribution System Map, and a Drought Contingency Plan.

Investigation: 1409347

Comment Date: 04/27/2017

Failure to provide water system records at the time of an inspection.

As of the April 27, 2017, file review investigation, no compliance documentation had been received from Nerro Supply LLC.

Investigation: 1438736

Comment Date: 12/07/2017

Failure to provide water system records at the time of an inspection.

**Resolution:** On August 25, 2017, the TCEQ Waco regional office recieved a copy of the Distribution System Map, and the Drought Contingency Plan.

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for **EACH** Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX0260037 (7 digit ID)

Name of PWS: Little Oak Forest Subdivision

Date of last TCEQ compliance inspection: 7/26/2017 (attach TCEQ letter)

Subdivisions served: Little Oak Forest

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit submitted to TCEQ: \_\_\_\_\_

23. List the number of existing connections, by meter/connection type, to be affected by the proposed transaction:

Water			Sewer	
	Non-metered		2"	Residential
36	5/8" or 3/4"		3"	Commercial
	1"		4"	Industrial
	1 1/2"		Other	Other
Total Water Connections:		36	Total Sewer Connections:	

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?

No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_

Water: \_\_\_\_\_

Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?

No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the Transferee?

No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?

No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part C: Mapping & Affidavits**

**ALL applications require mapping information to be filed in conjunction with the STM application.**  
*Read question 29 A and B to determine what information is required for your application.*

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application:

1. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.

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



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 29, 2017

RECEIVED  
SEP 06 2018  
TCEQ  
CENTRAL FILE ROOM

CERTIFIED MAIL #7017 1450 0000 5039 1711  
RETURN RECEIPT REQUESTED

Mr. Gregory Pappas, Manager  
Nerro Supply LLC  
P.O. Box 691008  
Houston, TX 77269

Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Little Oak Forest Subdivision, Burleson County, Texas  
Regulated Entity No.: 102676202, TCEQ ID No.: 0260037

Dear Mr. Pappas:

On July 26, 2017, Katelyn Mehringer and Hudson Tuller of the Texas Commission on Environmental Quality (TCEQ) Waco Regional Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for a public water supply. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted which were alleged noncompliances that have been resolved as Areas of Concern based on subsequent corrective action. In addition, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by November 27, 2017, 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 Waco Regional Office at (254) 751-0335 or the Central Office Publications Ordering Team at (512) 239-0028.


The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify the Waco Regional Office within 10 days from the date of this letter. At that time, I 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.



Mr. Pappas  
Page 2  
August 29, 2017

If you or members of your staff have any questions, please feel free to contact Ms. Katelyn Mehringer in the Waco Regional Office at (254) 751-0335.

Sincerely,



Richard Monreal  
Water Section Manager  
Waco Regional Office

RM/KM/gb

Enclosure: Summary of Investigation Findings

## Summary of Investigation Findings

LITTLE OAK FOREST SUBDIVISION

Investigation #

, BURLESON COUNTY,

1434827  
Investigation Date: 07/26/2017

Additional ID(s): 0260037

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

Track No: 651425      Compliance Due Date: 11/27/2017  
30 TAC Chapter 290.46(l)

**Alleged Violation:**

Investigation: 1434827

Comment Date: 08/22/2017

Failure to flush dead-end mains on a monthly basis.

All dead-end mains must be flushed at monthly intervals. Dead-end lines and other mains shall be flushed as needed if water quality complaints are received from the water customers or if disinfectant residuals fall below acceptable levels as specified in §290.110 of this title.

It was noted during the July 26, 2017, compliance investigation that Little Oak Forest Subdivision has no documentation of flushing any dead-end mains.

**Recommended Corrective Action:** The documentation received in the TCEQ Regional Office on August 4, 2017, did not contain the required compliance documentation for this violation. Although a flushing procedure was received, 90 days of flushing records are required as sufficient compliance documentation.

Track No: 651431      Compliance Due Date: 11/27/2017  
30 TAC Chapter 290.46(n)(2)

**Alleged Violation:**

Investigation: 1434827

Comment Date: 08/21/2017

Failure to maintain a distribution system map with valves and mains indicated.

An accurate and up-to-date map of the distribution system shall be available so that valves and mains can be easily located during emergencies.

During the July 26, 2017, compliance inspection, it was noted that Little Oak Forest Subdivision did not have an up to date distribution system map with valves and mains indicated.

**Recommended Corrective Action:** The documentation received in the TCEQ Regional Office on August 4, 2017, did not contain the required compliance documentation for this violation. Although an up to date distribution map was received, mapped distribution line sizes are required as sufficient compliance documentation.

Track No: 651606      Compliance Due Date: 11/27/2017  
30 TAC Chapter 290.46(s)(1)

**Alleged Violation:**

Investigation: 1434827

Comment Date: 08/22/2017

Failure to calibrate a well meter every three years.

Well meters required by §290.41(c)(3)(N) of this title shall be calibrated at least once every

three years.

During the July 26, 2017, compliance inspection, it was noted that Little Oak Forest Subdivision had no documentation showing the last time the well meter was calibrated.

**Recommended Corrective Action:** The documentation received in the TCEQ Regional Office on August 4, 2017, did not contain the required compliance documentation for this violation. Although a well meter calibration was completed, results were not within AWWA standards of 1.5%-2.0%.

Track No: 651612 Compliance Due Date: 11/27/2017

30 TAC Chapter 290.45(b)(1)(A)(i)

**Alleged Violation:**

Investigation: 1434827

Comment Date: 08/22/2017

Failure to meet the minimum well capacity requirement.

Groundwater supplies must meet the following requirements.

(A) If fewer than 50 connections without ground storage, the system must meet the following requirements:

(i) a well capacity of 1.5 gallons per minute (gpm) per connection; [.]

During the July 26, 2017, compliance inspection, it was noted that Little Oak Forest Subdivision is at 33% deficiency of supply requirements as defined in 30 TAC 290.45. The required production capacity is 45 GPM for the 30 connections served. During the compliance investigation, the well production was determined to be 30 GPM.

**Recommended Corrective Action:** Submit to the TCEQ Waco Regional Office compliance documentation to meet the minimum water capacity supply requirements defined in 30 TAC §290.45.

**AREA OF CONCERN**

Track No: 651591

30 TAC Chapter 290.42(j)

**Alleged Violation:**

Investigation: 1434827

Comment Date: 08/22/2017

Failure to utilize chemicals conforming to ANSI/NSF standards.

Treatment chemicals and media. All chemicals and any additional or replacement process media used in treatment of water supplied by public water systems must conform to ANSI/NSF Standard 60 for Drinking Water Treatment Chemicals and ANSI/NSF Standard 61 for Drinking Water System Components. Conformance with these standards must be obtained by certification of the product by an organization accredited by ANSI.

During the July 26, 2017, compliance inspection, it was noted that Little Oak Forest Subdivision did not have proof of NSF certification for the sodium hypochlorite utilized for water treatment.

**Resolution:** Compliance documentation received in the Waco Regional Office on August 4, 2017, provided the NSF certification for the sodium hypochlorite.

Track No: 651594

30 TAC Chapter 290.46(w)

**Alleged Violation:**

Investigation: 1434827

Comment Date: 08/21/2017

Failure to maintain internal procedures to notify the executive director in case of an event that negatively impacts the drinking water.

All systems shall maintain internal procedures to notify the executive director by a toll-free reporting phone number immediately of the following events, if the event may negatively impact the production or delivery of safe and adequate drinking water:

- (1) an unusual or unexplained unauthorized entry at property of the public water system;
- (2) an act of terrorism against the public water system;
- (3) an unauthorized attempt to probe for or gain access to proprietary information that supports the key activities of the public water system;
- (4) a theft of property that supports the key activities of the public water system; or
- (5) a natural disaster, accident, or act that results in damage to the public water system.

During the July 26, 2017, compliance inspection, it was noted that Little Oak Forest Subdivision did not have the internal procedures to notify the executive director in case of an event that may negatively impact the production or delivery of safe drinking water.

**Resolution:** Compliance documentation received in the Waco Regional Office on August 4, 2017, provided the internal procedures to notify the executive director in case any of these five events occur that may negatively impact the production or delivery of safe drinking water.



**GULF UTILITY  
SERVICE, INC.**  
281-355-1312

August 4, 2017

Katelyn Mehringer  
Comprehensive Compliance Investigation  
Little Oak Forest Subdivision  
PWS ID 0260021

Ms. Mehringer,

Please find the requested compliance items attached in reference to the Little Oak Forest compliance investigation on July 26, 2017.

1. Failure to flush all dead end mains monthly.
  - We have located and repaired the broken flush valve in the system and will commence monthly flushing. Our flushing procedure is provided in Attachment A, page 2.
2. Failure to maintain a distribution system map with valves and mains.
  - The requested distribution map is provided in Attachment B, page 5.
3. Failure to have NSF certification.
  - We contacted our chemical supplier and had them place the correct labeling on the container. They provided us with an image of the placed label. This image has been provided in Attachment C, page 7.
4. Failure to maintain internal procedures to notify if these 5 events occur.
  - Our monitoring plan has been updated with the Homeland Security toll free number and will be available at the facility. This information has been provided in Attachment D, pages 9-14.
5. Failure to calibrate well meter every 3 years.
  - A copy of the meter calibration record is provided in Attachment E, page 11.

If you have any questions or concerns, feel free to contact us.

Sincerely,

Jamie Kindred  
Compliance Associate  
Gulf Utility Service, Inc.



# Attachment

## A



## Dead End Flushing Procedure

### I. Goal

The purpose of the flushing program is to provide a safe high quality water supply to the customers. Debris can enter and accumulate in a water distribution system. Disinfectant residuals can deplete due to low usage and disinfectants may combine with materials in the system to form undesirable byproducts. Each of these situations may be corrected by an adequate flushing program

### II. Flushing Points

Each water system has its own designated flushing points that will be assigned when a flushing work order has been created.

### III. Guideline:

1. Start at or near a source of supply and work outward into the distribution system.
2. Open the fire hydrant or blow-off valve slowly
3. Direct flushing water away from traffic, pedestrians and private property.
4. Avoid damage to lawns and yards by the use of a meter lid to protected the grassy area that would be affected
5. Avoid flooding, which can cause traffic problems
6. Assure that the system pressure in nearby areas do drop below 138 kPa (20 psi)
7. Record all pertinent data regarding the flushing operation in the mobile app
8. Note any all repair work that is needed
9. When estimating gallons used please use the following calculations

Fire Hydrants: 100 Gals per foot per min flushed. (Example: If a hydrant is flows 3 ft. out when flushed for 15 mins it would have flushed approx. 4500 gallons)

Blow Offs: 2" pipes not reduced or expanded produce 300 gallons per minute at 4-5ft of distance

### IV. Plan Of Action

1. A systematic flushing of the entire distribution system will be conducted annually or more often if required to maintain water quality. Individual sites will be flushed as needed. The flushing program will ensure that:
  - a. Dead end/ low usage mains are flushed monthly
  - b. Drinking water standards are met
  - c. Sediment and air are removed
  - d. The required Free/Total chlorine residual is maintained
2. In some instances specific areas of distribution system may need to be flushed more frequently to correct problems. These problems may include but are not limited to the following:
  - a. Air in the lines
  - b. Sediment in the lines
  - c. Maintaining the Free/Total Chlorine Residuals

- d. Taste, odor of color problems
3. Flushing will be performed by Licensed Operators and Field Technicians
4. Following line repairs, main lines will be flushed to remove air and sediment from the repaired section of the line. If disinfection is necessary the line will be flushed to remove the high chlorine content. During flushing, water containing high chlorine concentrations should be flushed on relatively flat ground so as not to contaminate a receiving stream or body of water.
5. Flushing should continue until the following conditions are met:
  - a. The hydrant/blow off has been flushed for a 15 minutes
  - b. The Free/Total chlorine residuals reaches a min of 1.0 mg/l
  - c. No air is detected
  - d. Water is clear with no visible sediment
  - e. No objectionable taste or odor remains

\*\*\* Note: When flushing hydrants or blow offs that are in a grassy area that can be affected by the water a meter box lid will be placed in that area to prevent any damage to yard.

#### V. Record Keeping

Records of each flushing will be maintained on a cloud based company website and in Kardia. These records will include the following:

- a. Water System Name
- b. Date
- c. Time Start
- d. Time Finished
- e. Blow off/ Hydrant Location
- f. Starting Condition
- g. Gallons Used
- h. The Free/Total residual after flushing
- i. Person responsible





**Attachment  
B**

# Little Oak Forest Distribution

## Water Plant

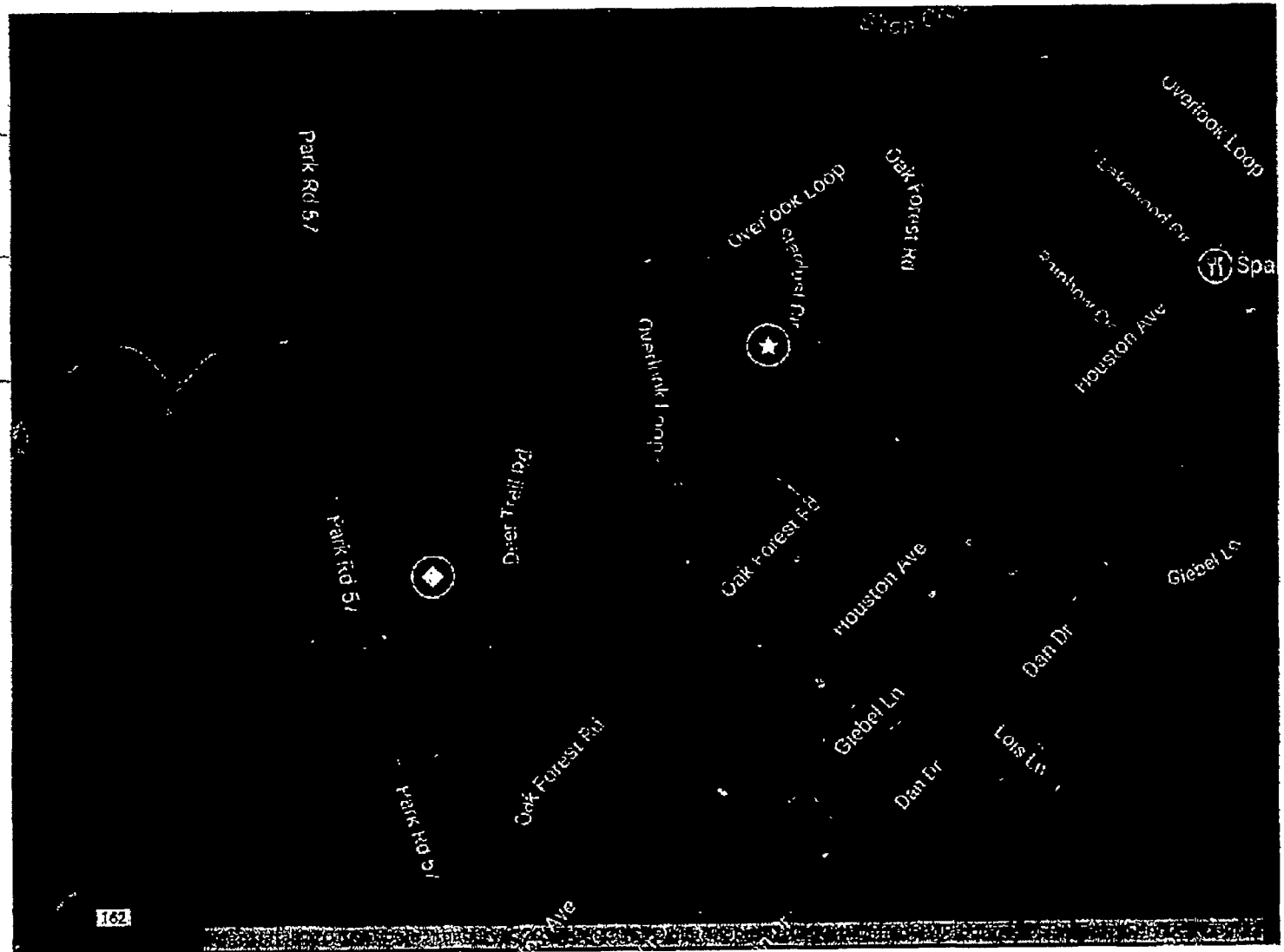
★ Water Plant

## Water Lines

📍 All items

## Flush Valve

⬠ Blow Off



**Attachment**  
**C**

FIRST AID

EMERGENCY HAZARDOUS  
DRAINING AGENTS

EMERGENCY HAZARDOUS

EMERGENCY HAZARDOUS  
TREATMENTS

CHILDREN

**Attachment  
D**



Monitoring Plan for

Name of System: Little Oak Forest

Date of Monitoring Plan: January 1, 2017

PWS ID: 0260037

Burleson County, Texas

Responsible Official: Gregory Pappas

Title: Manager

Water Supply Contact Name: Gulf Utility Service, Inc.

Job Title: Operator

Phone Number: 281-355-1312

Mailing Address: PO Box 691008  
Houston, TX 77269

Apache Hills owns and operates 1 groundwater well.

The water system serves 75 people with 30 connections.

- A. RAW WATER SAMPLING  
We are not required to collect raw water samples.
- B. IN-PLANT SAMPLING  
Our treatment is chlorination to disinfect the water.
- C. ENTRY POINT SAMPLING

Entry Point	Sample Site	Source	Plant Name
EPI	<b>Sample tap on</b> _____ Pressure Tank <b>Located at</b> 100 Stardust Circle	Yegua Aquifer	WP #1

## Disinfectant Entering the Distribution System

System Name: Apache Hills

PWS ID: 0260037

Entry Points: 1

1. Our system uses free chlorine in the distribution system.
  - a. Frequency: Disinfectant residual is measured once per week.
  - b. Location: The residual for the entry point is measured at the sample tap on the pressure tank.
  - c. Method: Chlorine is measured using a colorimeter/DPD; Hach Pocket Colorimeter.
  - d. Compliance Calculations: The system is in compliance if the free chlorine residual entering the distribution system is over 0.2 mg/L.
  
2. Organic Chemicals, Inorganic Chemicals, and Radiochemicals
  - a. Frequency: The TCEQ's sampling contractor collects these samples. Letters informing us of changes in the sampling schedule are attached to the back of this monitoring plan.
  - b. Location: The contaminant concentrations for the entry point are measured at the sample tap on the storage tank.
  - c. Method: Samples are sent to a certified lab. (TDH/LCRA) by the TCEQ's sampling contractor.
  - d. Compliance Calculations: If the concentrations of contaminants are less than the regulatory maximum contaminant levels, our system is in compliance. The TCEQ will inform us of violations. Copies of any letters informing us of violations will be attached in the back of this monitoring plan.
  
3. Chlorine Dioxide  
We don't use Chlorine Dioxide
  
4. Chlorite  
We don't use Chlorine Dioxide
  
5. Bromate  
We don't use ozone.

## D. DISTRIBUTION SYSTEM SAMPLING

The distribution system consists of 30 connections. The system has 1 well. The water is disinfected with free chlorine. It is stored in a pressure tank. The water then goes out to the connection(s) in distribution.

1. Coliform Samples
  - a. Frequency: We collect one coliform sample during the first week of each month, so we have time to do repeats, if necessary. We rotate through the sample sites below.
  - b. Location: The sample is taken from the outside tap at the following locations.
    1. 303 Overlook Loop, Somerville, TX 77879
    2. 301 Stardust Circle, Somerville, TX 77879
    3. 115 Oak Forest Rd., Somerville, TX 77879
    4. 108 Oak Forest Rd., Somerville, TX 77879

5. 103 Sunset Lane, Somerville, TX 77879

c. Method Coliform samples are sent to a nearby lab:

Name of Lab: R&C Joy Inc

Phone: (281) 858-5988

Mailing/Physical Address: 19020 W. Little York Rd.  
Katy, TX 77449

d. Compliance Calculations: The system is in compliance if:

- No repeat samples are fecal or E. coli positive
- No repeat following a fecal or E. coli positive routine sample is positive for total coliform.
- No more than one of the routine samples are total coliform positive and none of the repeats are fecal or E. coli positive.

## 2. Disinfectant Residual-Free Chlorine

a. Frequency: The disinfectant residual is measured at the same time as microbial samples. The disinfectant residual is also measured once every seven days, rotating through the sample sites.

b. Location: The disinfectant residual is measured at the same place the microbial sample is taken, plus the 5 additional sites representing the whole distribution system. The other sites are the outside taps listed above.

c. Method: Chlorine is measured using a colorimeter/DPD; Hach Pocket Colorimeter

d. Compliance Calculations: The system is in compliance with the minimum residual requirement if the free chlorine residual throughout the distribution system is always greater than 0.2 mg/L. The system is in compliance with the maximum residual disinfectant level (MRDL) if the running annual average of all samples taken in the distribution system is less than 4.0 mg/L.

## 3. Disinfection Byproducts (DBPs) – TTHM and HAA5

a. Frequency: The TCEQ's sampling contractor collects those samples. Letters informing us of changes in sampling schedule are attached to the back of this monitoring plan.

b. Location: The sample is collected from the outside tap at the storage tank.

c. Method: Samples are taken to a certified lab by the TCEQ's sampling contractor.

d. Compliance Calculations: The system is in compliance if the running annual average of all samples is less than the maximum contaminant level. The TCEQ will notify us of any violations.

### Sample Sites:

1. 312 Oak Forest
2. 313 Oak Forest

## 4. Lead Copper



a. Frequency: The water system is responsible for distributing the one liter unpreserved laboratory-grade bottles for collection of these samples. Systems must complete two rounds of consecutive six month sampling. Systems that have completed their two rounds of initial sampling can be reduced to 1 year or 3 year sampling based on their 90<sup>th</sup> percentile lead and copper sampling during their initial sampling period.

b. Location: The first draw tap samples collected from the inside plumbing (kitchen and restroom sinks) shall be from sites listed on the Lead/Copper Sample Site Pool Selection Form that was submitted to TCEQ. When changing addresses are necessary, the water system must submit the updates on Form 20697.

c. Method: First draw samples are taken from an inside tap.

d. Compliance Calculations: Action levels (ALB) for lead/copper are based on a 90th percentile calculation. The action level for lead is 0.015 mg/L and 1.3 mg/L for copper. If a PWS exceeds either of the action levels, the PWS is required to sample for water quality parameters, source water lead and copper sampling, and tap water lead/copper sampling as part of a corrosion control study. Lead action level exceedances also requires Lead Public Education (LPE) to be delivered and posted.

Sample Sites:

1. LCR001- 108 Oak Forest Rd.
2. LCR002- 208 Oak Forest Rd.
3. LCR003- 303 Overlook Loop Drive
4. LCR004- 402 Overlook Loop Drive
5. LCR005- 410 Overlook Loop Drive

5. Asbestos

The TCEQ has assessed our system and determined that we have no asbestos concrete pipe or that asbestos is not regulated for our system.

6. Chlorine Dioxide

We don't use Chlorine Dioxide

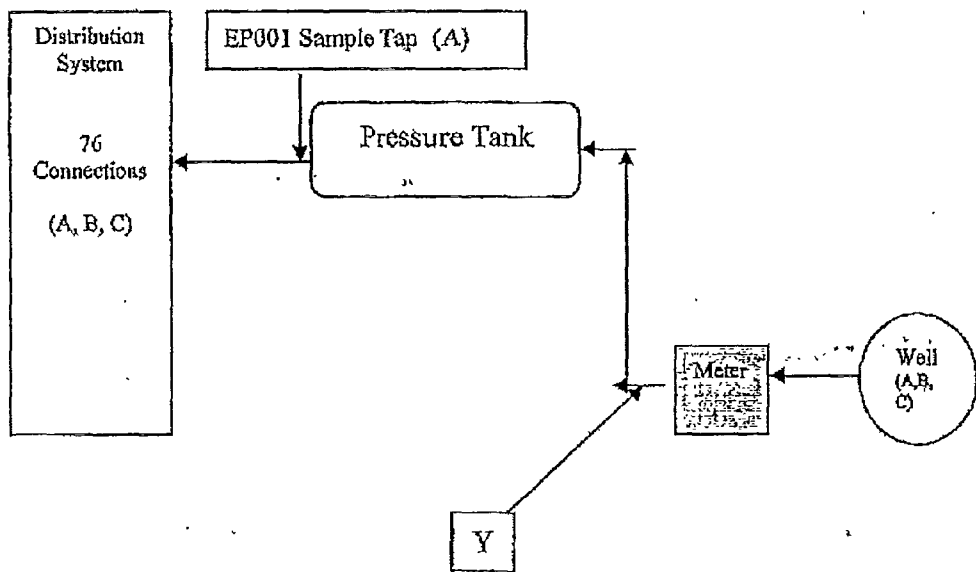
7. Chlorite

We don't use Chlorine Dioxide

A copy of our laboratory approval form is attached as an appendix to this monitoring plant

Name of system: Apache Hills

Y= Hypochlorite injection point



Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 15, 2006

Subject: Establishment of a TCEQ Toll Free Homeland Security Threat Reporting Number

Dear Water Sector Official:

A toll-free reporting number has been established to contact the Texas Commission on Environmental Quality (TCEQ) if your water system has been impacted by an act that threatens the ability of the system to provide safe and adequate service. This number is being used in response to Senate Bill 9, passed by the 79th Regular Session of the Texas Legislature in 2005, which requires public water supply and wastewater systems to maintain procedures to contact the TCEQ under certain circumstances.

Section 341.033 of the Health and Safety Code was amended by adding Subsection (i) to read as follows:

- (i) An owner, agent, manager, operator, or other person in charge of a public water supply system that furnishes water for public or private use or a wastewater system that provides wastewater services for public or private use shall maintain internal procedures to notify the commission immediately of the following events, if the event may negatively impact the production or delivery of safe and adequate drinking water:
- (1) an unusual or unexplained unauthorized entry at property of the public water supply or wastewater system;
  - (2) an act of terrorism against the public water supply or wastewater system;
  - (3) an unauthorized attempt to probe for or gain access to proprietary information that supports the key activities of the public water supply or wastewater system;
  - (4) a theft of property that supports the key activities of the public water supply or wastewater system; or
  - (5) a natural disaster, accident, or act that results in damage to the public water supply or wastewater system.

In the event that your public water supply or wastewater system is impacted by a threat as noted above, you may utilize a 24-hour toll-free number, 1-888-777-3186, when contacting the TCEQ.

If you have any questions or need more information, please call 512/239-4691 for water supply questions or 512/239-4671 for wastewater questions. Thank you for your continued partnership in ensuring safe water for the state of Texas.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Hastings".

Debbie Marnula Hastings  
Homeland Security Coordinator

# **Attachment**

## **E**



1402 Vander Will Lane, Katy, Texas 77449  
 (281) 391-8100 Fax (281) 391-8110  
 www.accuratemeter.com

**SERVICE ORDER**

Customer:  District:  SO:

Contact:  PO No.:  Date:

Address:  Phone:  Tech:

Location:  Key Map:

**Description:**

Meter:	Size:	Model:	Serial #:	Read:
<input type="text" value="MASTER"/>	<input type="text" value="2"/>	<input type="text" value="MJ"/>	<input type="text" value="2385698"/>	<input type="text" value="20880.7"/>
New Meter:	Size:	New Model:	New Serial #:	New Read:
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Work Completed:**

Incomplete?:  Complete Date:

**Notes:**

**TEXAS SECRETARY of STATE**  
**ROLANDO B. PABLOS**

[UCC](#) | [Business Organizations](#) | [Trademarks](#) | [Notary](#) | [Account](#) | [Help/Fees](#) | [Briefcase](#) | [Logout](#)

BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: Entity Type: Domestic Limited Liability Company (LLC)  
 Original Date of Filing: February 7, 2011 Entity Status: In existence  
 Formation Date: N/A  
 Tax ID: FEIN:  
 Duration: Perpetual  
 Name: Nerro Supply, LLC  
 Address: PO BOX 691008  
 HOUSTON, TX 77269-1008 USA

REGISTERED AGENT	FILING HISTORY	NAMES	MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES
Last Update	Name	Title	Address		
September 4, 2013	GREGORY PAPPAS	MANAGER	718 WESTCOTT STREET HOUSTON, TX 77007 USA		
September 4, 2013	CHARLEIE GASTPER	MANAGER	P.O. BOX 1828 SPRING, TX 77383 USA		

Instructions:

- To place an order for additional information about a filing press the 'Order' button.

Session Code: 0821170K0303

[Questions or Comments >>](#)

[Main Query Page](#)   [Program Area Search](#)

Regulated Entity Detail						
Regulated Entity Name:	LITTLE OAK FOREST SUBDIVISION			RN#	RN102676202	
Status:	Active	Status Comment:		Stand Alone:	N	
Physical Address:	No physical or street address on file.			County:	BURLESON	
Physical Location:	NO ADDRESS ON FILE					
Nearest City:		State:	TX	Zip Code:		
Latitude:		Longitude:				

1-1 of 1 Records

Affiliated Customers						<a href="#">List All</a>
CN Number	Customer	Role	Begin Date	End Date	RE Comp Hist	
CR60327333	NARRO SUPPLY LLC	OWNER	09/23/2015	12/31/2000	N/A	

1-3 of 3 Records

Program Interests									
Program	RE Type	ID Type	Addn ID	Addn ID Status	Alt RE Name	Role	Customer Name (CN)	Begin Date - End Date	View 'Issued To' History
PUBLIC WATER SYSTEM/SUPPLY	SITE	REGISTRATION	0160032	ACTIVE		RESPONSIBLE PARTY	BBAZOS VALLEY SEPTIC & WATER INC (CN603067331)	01/01/1000 - 09/22/2015	<a href="#">View</a>
PUBLIC WATER SYSTEM/SUPPLY	SITE	REGISTRATION	0160032	ACTIVE		OWNER	NARRO SUPPLY LLC (CN60327333)	09/23/2015 - 12/31/2000	<a href="#">View</a>
WATER LICENSING	ORGANIZATION	LICENSE	0260032	INACTIVE					<a href="#">View</a>

The Customer Name displayed may be different from the Customer Name associated with the Additional ID. This name may be different due to ownership changes, legal name changes, or other administrative changes.

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**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
*Domestic Mail Only*

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Certified Mail Fee	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____
Postage	
Total Postage amt	
Sent To	MR GREGORY PAPPAS MANAGER
Street and Apt. No.	NERRO SUPPLY LLC PO BOX 691008
City, State, ZIP+4	HOUSTON TX 77269

Postmark  
Here

PS Form 3800, April 2015 PSN 7530-02-000-5047 See Reverse for Instructions

7017 1450 0000 5039 1711

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY												
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>Signature  <i>x Adriana Ocampo</i> <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Adriana Ocampo</i> C. Date of Delivery <i>9/7/17</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center; font-size: large; font-weight: bold;">SEP 11 2017</p> <p style="text-align: center; font-size: x-large; font-weight: bold;">TCEQ WACO REGION 9</p>												
<p>1. Article Addressed to:</p> <p>MR GREGORY PAPPAS MANAGER NERRO SUPPLY LLC PO BOX 691008 HOUSTON TX 77269</p>	<p>3. Service Type</p> <table style="width: 100%; font-size: small;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery in Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Certified Mail Restricted Delivery in Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®												
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™												
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery												
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise												
<input type="checkbox"/> Certified Mail Restricted Delivery in Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation™												
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Signature Confirmation Restricted Delivery												
<p>2. Article Number</p> <p style="font-size: large; font-weight: bold;">7017 1450 0000 5039 1711</p>													

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



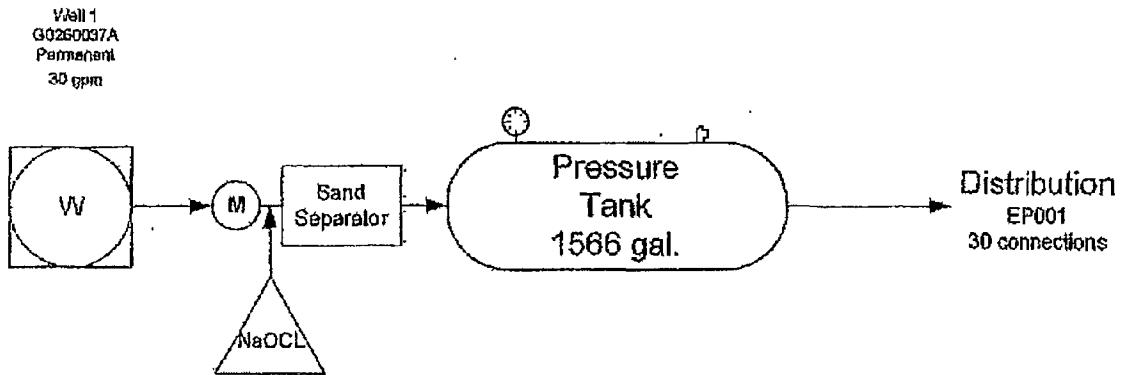
**Little Oak Forest Subdivision**

July 26, 2017

**PWS 0260037**

**Burleson County**

**Katelyn Mehringer**



**PUBLIC WATER SYSTEM DATA**

Name of System:	Little Oak Forest Subdivision		
CCN Number:	NA	PWS ID:	260037
Classification:	Not Applicable	Type:	Community
Region Number:	8		
Interconnect with Other PWS:	No	Name of PWS I/C:	Not applicable
Type I/C:			
Retail Service Connections:	30	Retail Meters:	30
Retail Population:	75		
Wholesale Master Meters:	0	Wholesale Service Connections:	0
Wholesale Population:	0		
Total Well Capacity:	30 GPM 0.0432 MGD		
Raw Capacity:	0 GPM 0 MGD		
Total Elevated Storage:	0.00 MG	Total Storage Capacity:	0.00 MG
Pressure Tank Capacity:	0.001566		
Maximum Daily Usage:	0.0054857 MGD	Date:	03/27/2017
Average Daily Usage:	0.0029 MGD	Time Period:	07/01/2016 to 06/30/2017
Wholesale Contract:	No	Maximum Purchase Rate :	Not applicable
No. of Samples Required:	1	No. of Samples Submitted:	1
No. of Raw Samples Required:	0	No. of Raw Samples Submitted:	0
Non-Comm Dates of Operation:	09/09/9999 to 09/09/9999		

**WATER STORAGE TANKS**

Type	Capacity	Material	Location
HD	1,566 gallons	ST	well site

**WATER SOURCES**

EP No.	Source Code	Owner's Des.	Location	Status	Pump Type	Test GPM	Est. GPM	Test Date
1	G0260037A	Well No. 1	main plant	Permanent	submersible	30		07/26/2017

**SYSTEM CAPACITIES**

Pressure Plane Number: 1 Name: Little Oak Forest Subd.

System Capacities	Required	Provided
Well Production	1.5 GPM Conn X 30 Conn = 45	GPM 30 GPM
Elevated Pressure Storage	50 (PT) Gal/Conn X 30 Conn = 0.001500	MG 0.001566 MG
Ground/Total Storage	NA Gal/Conn X Conn =	MG
Service Pump Capacity	NA GPM/Conn X Conn =	GPM

Service Pump Peaking Factor NA	MDD/1440 X	**	GPM
Tested PSI: 52 Tested CL2: >2.20 Free Locallon: 115 Oak Forest Road			

<u>Texas Commission on Environmental Quality</u>	<u>Office of Water</u>	<u>Public Drinking Water Section</u>
<u>County Map of TX</u>	<u>Water System Search</u>	<u>Office of Compliance and Enforcement</u>

08/16/2017  
02:08:14

Texas Commission on Environmental Quality  
DWW Water System Summary Sheet

PWS ID	PWS Name	Central Registry RN
TX0260037	LITTLE OAK FOREST SUBDIVISION	RN102676202

Organization/Customer *	Central Registry CN
NERRO SUPPLY LLC	CN603827353

\*Regulatory mail will be addressed to this organization/person

All Water System Contacts			
Type	Contact	Communication	
AC - Administrative Contact - OWNER	PAPPAS, GREGORY, P PO BOX 691008 HOUSTON, TX 77269-1008	<b>Electronic Type</b>	<b>Value</b>
		<b>Phone Type</b>	<b>Value</b>
		BUS - Business	281-355-1312
		FAX - Facsimile	281-288-4844
FC - Financial Contact	GULF UTILITY SERVICE INC PO BOX 691008 HOUSTON, TX 77269-1008	<b>Phone Type</b>	<b>Value</b>
		BUS - Business	<del>832-653-4084</del> 281-3554
OW - Owner	NERRO SUPPLY LLC PO BOX 691008 HOUSTON, TX 77269-1008	<b>Phone Type</b>	<b>Value</b>
		BUS - Business	281-355-1312
PWS - Public Water System Contact - OPERATIONS MANAGER	Kindred, Jamie <del>SKARBOSZEWSKI, KART</del> PO BOX 691008 HOUSTON, TX 77269-1008	<b>Electronic Type</b>	<b>Value</b>
		<b>Phone Type</b>	<b>Value</b>
		BUS - Business	<del>832-696-9173</del> 832-4974
		BUS - Business	281-355-1312
		MOB - Mobile	<del>281-832-9291</del> 346-36014

Operator Grade	Number
----------------	--------

Gonzales, Anival  
Class D - Water Operator W0883954  
Dukes, Roy J JR  
Class C - Water Operator W08815763  
Freeman, Anthony  
Class B - Water Operator W0881285

Water Operator Licenses
No Licensing Data for this PWS

Owner Type	Owner Type Options: COUNTY, DISTRICT, FEDERAL GOVERNMENT, INVESTOR OWNED, MUNICIPALITY, NATIVE AMERICAN, PRIVATE, STATE GOVERNMENT, WATER SUPPLY CORPORATION
Investor Owned	

System Type	System Type Options: COMMUNITY, TRANSIENT/NON-COMMUNITY, NON-PUBLIC, NON-TRANSIENT/NON-COMMUNITY
C - Community	

Population Type	Population Served	# of Connect	# I/C w/other PWS
Residential	51 75	19 30	0

Total Product (MGD)	Average Daily Consump.	Max Daily Demand (MGD)	Total Storage (MG)	Elev. Storage (MG)	Service Pump Cap.	Max. Purchase Cap. (MGD/GPM)	Pressure Tank Cap. (MG)
0.0410 MGD	0.0020 MGD	0.0020 MGD Occurred on 06/09/2014					0.001 MG

D.0432 D0029 0.0054857  
3.27.17

Activity Status	Inactivation Date
A - ACTIVE	

Last Survey Date	Surveyor	Survey Type	Region	County
11/25/2014	GEORGE LOGAN	Sanitary Survey	WACO	BURLESON
11/30/2011	RICK CIAMPI	Sanitary Survey	WACO	BURLESON
02/12/2009	RICHARD, D MONREAL	Sanitary Survey	WACO	BURLESON

7-26-17 Katelyn Mehringer

(Treatment Plant)							
Entry Point	EP Name/Source Summation (Activity Status)	Plant Name (Activity Status)	Plant Num	Chemical Mon Type	Chem Sample Point	Distribution Mon Type	Dist Sample Point
EP001	TRT-TAP / Ground Water(A)	PLANT(A)	TP1712		NO		NO

Train: Unnamed				
(Treatments)				
Disinfection Zone	Treatment Sequence	Objective	Process	Treatment
null	null	D	423	HYPOCHLORINATION, PRE

(Active Sources)						
Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G0260037A	1 - STARDUST (A)	P	G	325	32 GPM	27 GPM
Drill Date		Source Summary				
01/01/1913		YEGUA 30				
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	Seller		
30.344454	-96.659979	0	08/20/2009	Not Purchasing		

(Inactive/Offline Sources)			
SourceNumber	Name	Status	Depth

Code Explanations
Monitoring Type Codes: (GW) GROUNDWATER, (GUP) GROUNDWATER UNDER THE INFLUENCE - PURCHASED, (SWP) SURFACE WATER - PURCHASED, (GU) GROUNDWATER UNDER THE INFLUENCE OF SURFACE WATER, (N) NO SOURCES, (SW) SURFACE WATER
Activity Status Codes: (A) ACTIVE, (D) DELETED/DISSOLVED, (I) INACTIVE, (P) PROPOSED,
Operational Status Codes: (E) EMERGENCY, (I) INTERIM/PEAK (O) OTHER, (P) PERMANENT, (S) SEASONAL
Source Types: (G) GROUND WATER, (S) SURFACE WATER, (U) GROUND WATER UNDER THE INFLUENCE

- End of Report - *Log in 9/26/07*  
*TOP 12/1/2007 - CK*

At the time of your query this data was the most current information available from our database, which is in real time. Every effort was made to retrieve it according to your query. Thank-you for using DWW.

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction.  
 Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX1700148 (7 digit ID)  
 Name of PWS: Loch Ness Cove Subdivision Water System  
 Date of last TCEQ compliance inspection: 2/10/2017 (attach TCEQ letter)  
 Subdivisions served: Loch Ness Cove

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ (8 digit ID)  
 Name of Wastewater Facility: \_\_\_\_\_  
 Name of Permittee: \_\_\_\_\_  
 Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)  
 Subdivisions served: \_\_\_\_\_  
 Date of application to transfer permit *submitted* to TCEQ: \_\_\_\_\_

23. List the number of *existing* connections, by meter/connection type, to be affected by the proposed transaction:

Water				Sewer	
	Non-metered		2"		Residential
89	5/8" or 3/4"		3"		Commercial
	1"		4"		Industrial
	1 1/2"		Other		Other
Total Water Connections:			80	Total Sewer Connections:	

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters).

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes:

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?

No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_

Water: \_\_\_\_\_

Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?

No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the transferee?

No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?

No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part G: Mapping & Affidavits**

**ALL applications require mapping information to be filed in conjunction with the STM application.**

*Read question 29 A and B to determine what information is required for your application.*

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application:

1. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.



Bryan W. Shaw, Ph.D., P.E., C( )an  
Toby Baker, Commissioner  
Jon Niermann, Commissioner  
Richard A. Hyde, P.E., Executive Director



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

May 1, 2017

Mr. Gregory P. Pappas, Manager  
Nerro Supply LLC  
PO Box 691008  
Houston, Texas 77269

Re: Notice of Compliance with Notice of Violation (NOV) dated August 23, 2017:  
Loch Ness Cove Subdivision Water System, on Calvary Rd. before Invermark Way  
Regulated Entity No.: 101178192 TCEQ ID No.: 1700148 Investigation No.: 1408981

Dear Mr. Pappas:

On February 10, 2017, the Texas Commission on Environmental Quality (TCEQ) Houston Region Office received adequate compliance documentation to resolve the alleged violation documented during the investigation of the above-referenced regulated entity conducted on August 3, 2016. 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. Alethea Seals in the Houston Region Office at (713) 767-3595.

Sincerely,

A handwritten signature in cursive script that reads "Julia Thorp".

Julia Thorp, Team Leader  
Public Water Supply  
Houston Region Office  
Texas Commission on Environmental Quality

JT/AS/djb

cc: Harris County Public Health and Environmental Services

Enclosure: Summary of Investigation Findings

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX0360108 (7 digit ID)

Name of PWS: Lost Lakes

Date of last TCEQ compliance inspection: 3/17/2016 (attach TCEQ letter)

Subdivisions served: Lost Lakes

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ - (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit *submitted* to TCEQ: \_\_\_\_\_

23. List the number of *existing* connections, by meter/connection type, to be affected by the proposed transaction.

Water				Sewer	
	Non-metered		2"		Residential
47	5/8" or 3/4"		3"		Commercial
	1"		4"		Industrial
	1 1/2"		Other		Other
Total Water Connections:			47	Total Sewer Connections:	

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes:

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?

No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_

Water: \_\_\_\_\_

Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?

No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the Transferee?

No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?

No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part G: Mapping & Affidavits**

**ALL applications require mapping information to be filed in conjunction with the STM application.**

**Read question 29 A and B to determine what information is required for your application.**

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application.

1. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.

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



COPY

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 27, 2018

Mr. Charles Peterson, Principal  
Nerro Supply, LLC  
P.O. Box 691008  
Houston, Texas 77269-1008


Re: Notice of Compliance with Notice of Violation (NOV) dated May 11, 2016:  
Lost Lakes, 219 Lost Lake Drive, Baytown, Chambers County, Texas  
Regulated Entity No.: 101207751  
TCEQ ID No.: 0360108 Investigation No.: 1460572

Dear Mr. Peterson:

On August 7, 2017, the Texas Commission on Environmental Quality (TCEQ) Houston Region Office received adequate compliance documentation to resolve the alleged violation documented during the investigation of the above-referenced regulated entity conducted on March 17, 2016. 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. Chisara Anoruo in the Houston Region Office at (713) 422-8942.

Sincerely,

  
Patricia Spikes, Team Leader  
Public Water Supply  
Houston Region Office

I.S/CA/dp

Enclosure: *Summary of Investigation Findings*

cc: Chambers County Environmental Health & Permitting  
P.O. BOX 1180, Amahuac, TX 77514-1180

## Summary of Investigation Findings

LOST LAKES

, CHAMBERS COUNTY,

Additional ID(s): 0360108

Investigation #

1460672

Investigation Date: 12/27/2017

### ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 602742

30 TAC Chapter 290.121(a)

#### Alleged Violation:

Investigation: 1319150

Comment Date: 05/01/2016

#### Monitoring Plan

Failure to develop and maintain an up to date system monitoring plan. The plan shall identify all bacteriological and chemical locations, describe the sampling frequency, and specify the analytical procedures and laboratories to be used to comply with monitoring requirements. The completed plan must be retained at each water plant, and made available for review during succeeding investigations.

Investigation: 1423679

Comment Date: 07/13/2017

Failure to develop and maintain an up to date system monitoring plan. The plan shall identify all bacteriological and chemical locations, describe the sampling frequency, and specify the analytical procedures and laboratories to be used to comply with monitoring requirements. The completed plan must be retained at each water plant, and made available for review during succeeding investigations.

During the File Record Review on July 5, 2017, it was noted that a Monitoring Plan had been submitted. However, the plan was lacking required information. The plan must contain a complete list of disinfectant sampling locations and a distribution map with sampling locations.

Investigation: 1460572

Comment Date: 12/27/2017

#### Monitoring Plan

Failure to develop and maintain an up to date system monitoring plan. The plan shall identify all bacteriological and chemical locations, describe the sampling frequency, and specify the analytical procedures and laboratories to be used to comply with monitoring requirements. The completed plan must be retained at each water plant, and made available for review during succeeding investigations.

**Recommended Corrective Action:** Submit a letter certifying that a system monitoring plan has been completed OR a copy of Monitoring Plan to verify compliance. The plan must contain a complete list of disinfectant sampling locations and a distribution map with sampling locations.

**Resolution:** On August 7, 2017, the Texas Commission on Environmental Quality (TCEQ) Houston Region received, via email, a copy of Lost Lakes Public Water Supply (PWS) system's monitoring plan.

**Part F: TCEQ Public Water System or Sewer (Wastewater) Information**

Complete Part F for EACH Public Water or Sewer system to be transferred subject to approval of the transaction. Attach a separate sheet with this information if you need more space for additional systems being transferred.

22. A. For Public Water System (PWS):

TCEQ PWS Identification Number: TX1980017 (7 digit ID)

Name of PWS: Oak Forest Lakeway Manor

Date of last TCEQ compliance inspection: 7/26/2017 (attach TCEQ letter)

Subdivisions served: Oak Forest Lakeway Manor

B. For Sewer service:

TCEQ Water Quality (WQ) Discharge Permit Number: WQ - (8 digit ID)

Name of Wastewater Facility: \_\_\_\_\_

Name of Permittee: \_\_\_\_\_

Date of last TCEQ compliance inspection: \_\_\_\_\_ (attach TCEQ letter)

Subdivisions served: \_\_\_\_\_

Date of application to transfer permit submitted to TCEQ: \_\_\_\_\_

23. List the number of existing connections, by meter/connection type, to be affected by the proposed transaction:

Water				Sewer	
	Non-metered		2"		Residential
49	5/8" or 3/4"		3"		Commercial
	1"		4"		Industrial
	1 1/2"		Other		Other
Total Water Connections:			49	Total Sewer Connections:	

24. A. Are any improvements required to meet TCEQ or Commission standards?

No  Yes

B. Provide details on each required major capital improvement necessary to correct deficiencies to meet the TCEQ or Commission standards (attach any engineering reports or TCEQ approval letters):

Description of the Capital Improvement:	Estimated Completion Date:	Estimated Cost:

C. Is there a moratorium on new connections?

No  Yes:

25. Does the system being transferred operate within the corporate boundaries of a municipality?

No  Yes: \_\_\_\_\_ (name of municipality)

If yes, indicate the number of customers within the municipal boundary.

Water: \_\_\_\_\_ Sewer: \_\_\_\_\_

26. A. Does the system being transferred purchase water or sewer treatment capacity from another source?

No  Yes: If yes, attach a copy of purchase agreement or contract.

Capacity is purchased from: \_\_\_\_\_

Water: \_\_\_\_\_

Sewer: \_\_\_\_\_

B. Is the PWS required to purchase water to meet capacity requirements or drinking water standards?

No  Yes

C. What is the amount of water supply or sewer treatment purchased, per the agreement or contract? What is the percent of overall demand supplied by purchased water or sewer treatment (if any)?

	Amount in Gallons	Percent of demand
Water:		0.00%
Sewer:		0.00%

D. Will the purchase agreement or contract be transferred to the Transferee?

No  Yes:

27. Does the PWS or sewer treatment plant have adequate capacity to meet the current and projected demands in the requested area?

No  Yes:

28. List the name, class, and TCEQ license number of the operator that will be responsible for the operations of the water or sewer utility service:

Name (as it appears on license)	Class	License No.	Water or Sewer

**Part G: Mapping & Affidavits**

**ALL applications require mapping information to be filed in conjunction with the STM application.**

*Read question 29 A and B to determine what information is required for your application.*

29. A. For applications requesting to transfer an entire CCN, without a CCN boundary adjustment, provide the following mapping information with each of the seven (7) copies of the application:

- I. A general location (small scale) map identifying the requested area in reference to the nearest county boundary, city, or town. The following guidance should be adhered to:
  - i. If the application requests to transfer certificated service areas for both water and sewer, separate maps must be provided for each.
  - ii. A hand drawn map, graphic, or diagram of the requested area is not considered an acceptable mapping document.

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 29, 2017

CERTIFIED MAIL #7016 3560 0000 0381 6477  
RETURN RECEIPT REQUESTED

Mr. Gregory Pappas, Manager  
Nerro Supply LLC  
P.O. Box 691008  
Houston, TX 77269

RECEIVED

SEP 06 2018

TCEQ  
CENTRAL FILE ROOM

Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Oak Forest Lakeway Manor, Robertson County, Texas  
Regulated Entity No.: 102688140, TCEQ ID No.: 1980017

Dear Mr. Pappas:

On July 26, 2017, Katelyn Mehringer and Hudson Tuller of the Texas Commission on Environmental Quality (TCEQ) Waco Regional Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for a public water supply. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted which were alleged noncompliances that have been resolved as Areas of Concern based on subsequent corrective action. In addition, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by November 27, 2017, 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 Waco Regional Office at (254) 751-0335 or the Central Office Publications Ordering Team at (512) 239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify the Waco Regional Office within 10 days from the date of this letter. At that time, I 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.



Mr. Pappas  
Page 2  
August 29, 2017

If you or members of your staff have any questions, please feel free to contact Ms. Katelyn Mehringer in the Waco Regional Office at (254) 751-0335.

Sincerely,



Richard Monreal  
Water Section Manager  
Waco Regional Office  
RM/KM/gb

Enclosure: Summary of Investigation Findings

## Summary of Investigation Findings

OAK FOREST LAKEWAY MANOR

Investigation #

1435209  
Investigation Date: 07/26/2017

, ROBERTSON COUNTY,

Additional ID(s): 1980017

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

Track No: 652186 Compliance Due Date: 11/27/2017

30 TAC Chapter 290.46(l)

**Alleged Violation:**

Investigation: 1435209

Comment Date: 08/23/2017

Failure to flush dead-end mains on a monthly basis.

All dead-end mains must be flushed at monthly intervals. Dead-end lines and other mains shall be flushed as needed if water quality complaints are received from the water customers or if disinfectant residuals fall below acceptable levels as specified in §290.110 of this title.

It was noted during the July 26, 2017, compliance investigation that Oak Forest Lakeway Manor has no documentation of flushing any dead-end mains.

**Recommended Corrective Action:** The documentation received in the TCEQ Regional Office on August 4, 2017, did not contain the required compliance documentation for this violation. Although a flushing procedure was received, 90 days of flushing records are required as sufficient compliance documentation.

Track No: 652190 Compliance Due Date: 11/27/2017

30 TAC Chapter 290.45(b)(1)(C)(ii)

**Alleged Violation:**

Investigation: 1435209

Comment Date: 08/25/2017

Failure to meet the minimum ground storage capacity requirement, [0.0108 MG required, 0.010 MG provided, for a 7.4% deficiency].

For 50 to 250 connections, the system must meet the following requirements:

[.]

(ii) a total storage capacity of 200 gallons per connection [.]

During the July 26, 2017, compliance inspection, it was noted that Oak Forest Lakeway Manor is at 7.4% deficiency of supply requirements as defined in 30 TAC 290.45. The required ground storage capacity is 0.0108 MG for the 54 connections served. During the compliance investigation, the ground storage capacity was determined to be 0.01 MG.

**Recommended Corrective Action:** Submit to the TCEQ Waco Regional Office compliance documentation that a minimum total storage capacity of 200 gallons per connection is provided.

Track No: 652306 Compliance Due Date: 11/27/2017

30 TAC Chapter 290.109(d)

**Alleged Violation:**

Investigation: 1435209

Comment Date: 08/25/2017

Failure to collect samples at sites that are representative of the distribution system.

(d) Monitoring requirements for microbial contaminants. Public water systems shall collect

samples for total coliform, fecal coliform, E. coli (or other approved fecal indicator) at sampling sites and a sample collection schedule, as designated by the public water system, which are subject to review and revision as directed by the executive director. All compliance samples must be collected at sampling sites and a sample collection schedule that are representative of water throughout the distribution system and shall be reflected in the public water system's Sample Siting Plan and included with the public water system's monitoring plan in accordance with §290.121 of this title (relating to Monitoring Plans). All public water systems shall develop a written Sample Siting Plan as described in paragraph (6) of this subsection.

During the July 26, 2017, compliance investigation, it was noted that Oak Forest Lakeway Manor was only using two sample sites noted in the sample siting plan. This is not a true representation of water throughout the distribution system.

**Recommended Corrective Action:** Submit to the TCEQ Waco Regional Office compliance bacteriological samples for 3 months, showing that samples are being collected from sites representative of the distribution system and from all locations specified in the Sample Siting Plan.

### AREA OF CONCERN

**Track No:** 652135

30 TAC Chapter 290.46(w)

**Alleged Violation:**

Investigation: 1435209

Comment Date: 08/23/2017

Failure to maintain internal procedures to notify the executive director in case of an event that negatively impacts the drinking water.

All systems shall maintain internal procedures to notify the executive director by a toll-free reporting phone number immediately of the following events, if the event may negatively impact the production or delivery of safe and adequate drinking water:

- (1) an unusual or unexplained unauthorized entry at property of the public water system;
- (2) an act of terrorism against the public water system;
- (3) an unauthorized attempt to probe for or gain access to proprietary information that supports the key activities of the public water system;
- (4) a theft of property that supports the key activities of the public water system; or
- (5) a natural disaster, accident, or act that results in damage to the public water system.

During the July 26, 2017, compliance inspection, it was noted that Oak Forest Lakeway Manor did not have the internal procedures to notify the executive director in case of an event that may negatively impact the production or delivery of safe drinking water.

**Resolution:** Compliance documentation received in the Waco Regional Office on August 4, 2017, provided the internal procedures to notify the executive director in case any of these five events occur that may negatively impact the production or delivery of safe drinking water.

**Track No:** 652162

30 TAC Chapter 290.42(j)

**Alleged Violation:**

Investigation: 1435209

Comment Date: 08/25/2017

Failure to utilize chemicals conforming to ANSI/NSF Standard.

Treatment chemicals and media. All chemicals and any additional or replacement process media used in treatment of water supplied by public water systems must conform to ANSI/NSF Standard 60 for Drinking Water Treatment Chemicals and ANSI/NSF Standard 61

for Drinking Water System Components. Conformance with these standards must be obtained by certification of the product by an organization accredited by ANSI.

During the July 26, 2017, compliance inspection, it was noted that Oak Forest Lakeway Manor did not have proof of NSF certification for the sodium hypochlorite utilized for water treatment.

**Resolution:** Compliance documentation received in the Waco Regional Office on August 4, 2017, provided the NSF certification for the sodium hypochlorite.

Track No: 652164

30 TAC Chapter 290.46(n)(2)

**Alleged Violation:**

Investigation: 1435209

Comment Date: 08/25/2017

Failure to maintain a distribution system map with valves and mains indicated.

An accurate and up-to-date map of the distribution system shall be available so that valves and mains can be easily located during emergencies.

During the July 26, 2017, compliance inspection, it was noted that Oak Forest Lakeway Manor did not have an up-to-date distribution system map with valves and mains indicated.

**Resolution:** Compliance documentation received in the Waco Regional Office on August 4, 2017, provided an up-to-date distribution system map including all valves and mains sizes.

Track No: 652308

30 TAC Chapter 290.121(b)(1)(B)

**Alleged Violation:**

Investigation: 1435209

Comment Date: 08/25/2017

Failure to have the entry point to distribution identified in the monitoring plan.

(B) Each entry point to the distribution system shall be identified in the monitoring plan as follows:

- (i) a written description of the physical location of each entry point to the distribution system shall be provided; or
- (ii) the location of each entry point shall be indicated clearly on a distribution system or treatment plant schematic.

During the July 26, 2017, compliance investigation, it was noted that Oak Forest Lakeway Manor did not have the correct physical location of the entry point to distribution in their monitoring plan.

**Resolution:** Compliance documentation received in the Waco Regional Office on August 4, 2017, provided the correct physical location (13147 Oak Forest Drive) of the entry point to distribution in the monitoring plan.