

ATTACHMENT C

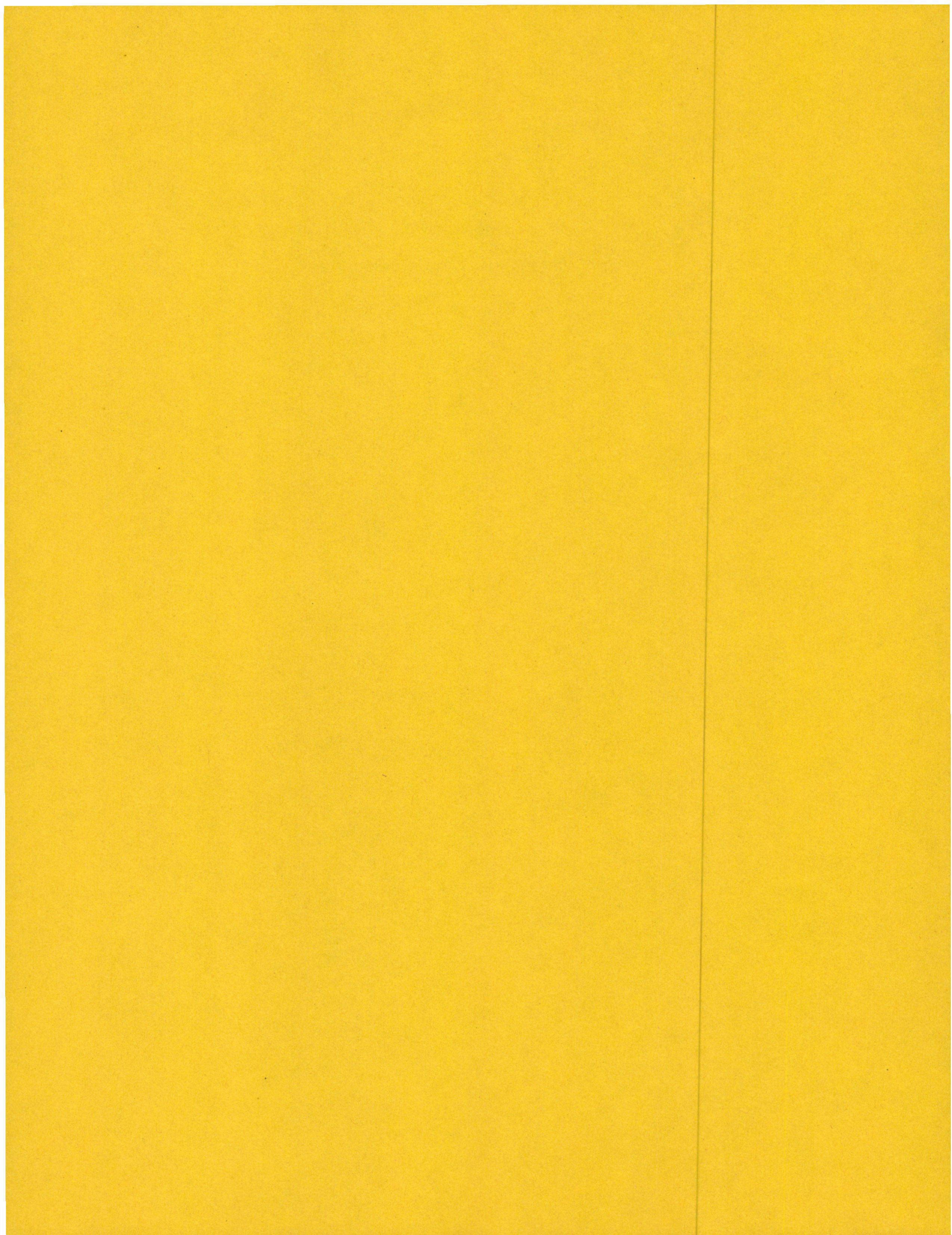
SWWC Utilities, Inc dba Water Services, Inc
 W/III-3 Asset Detail - Wadesfield (excluding Westwood Oaks)
 Docket No. 47736
 Test Year Ending 12/31/2016

Asset	System	PWS No.	PWS Name	Asset Class	Asset Description	Type	#Dep. Servs	Life Yr	Life Mo	2,724,827		2,724,827		2,724,827		(1,051,854.77)		(1,051,854.77)		1,051,854.77	
										Original Cost	ECO Margin Cost	Original Cost Less BCS Adjust	Current CLAC	Original Cost Adjusted for Current CLAC	FP&E Accum. Depr	ECO Margin Accum. Depr	Accumulated Depreciation Less ECO Margin	Net Plant In Service			
20001998	Wadesfield	1330024	Woodhaven MHP	334	AMR METR EXCHANUF W/W - WHAN	Water	03/31/17	20	0	8,033	-	8,033	-	8,033	-	-	-	-	-	-	8,033
20003999	Wadesfield	1330141	Wenwood Oaks	334	AMR METER EXCHANUF W/W - W/OK	Water	03/31/17	20	0	5,638	-	5,638	-	5,638	-	-	-	-	-	-	5,638
20014004	Wadesfield	1330154	Oak Ridge F-states	334	AMR METER EXCHANOE W/W - ORFS	Water	03/31/17	20	0	11,713	-	11,713	-	11,713	-	-	-	-	-	-	11,713
20007173	Wadesfield	1330027	Verde Park	335	Other Fire Hydrant	Water	11/01/00	50	0	915	-	915	-	915	-	(297)	-	-	-	-	618
20003728	Wadesfield	1330128	Southern Hills	335	Other Fire Hydrant (2)	Water	11/01/99	50	0	1,666	-	1,666	-	1,666	-	(573)	-	-	-	-	1,093
20003751	Wadesfield	1330128	Southern Hills	335	Other Fire Hydrant	Water	03/01/02	50	0	954	-	954	-	954	-	(283)	-	-	-	-	671
20003752	Wadesfield	1330128	Southern Hills	335	Distribution System Fire Hydrant & F-Ext	Water	03/01/02	50	0	1,634	-	1,634	-	1,634	-	(484)	-	-	-	-	1,150
20001762	Wadesfield	1330128	Southern Hills	335	Other Fire Hydrant (2) Medflow	Water	03/01/04	50	0	3,088	-	3,088	-	3,088	-	(1,289)	-	-	-	-	3,799
20001784	Wadesfield	1330128	Southern Hills	335	Other Fire Hydrant (Track)	Water	10/01/05	50	0	1,228	-	1,228	-	1,228	-	(277)	-	-	-	-	951
20001447	Wadesfield	Shared Assets	Shared Assets	140	Other A/C Unit	Water	06/27/12	5	0	562	-	562	-	562	-	(315)	-	-	-	-	47
20003532	Wadesfield	Shared Assets	Shared Assets	144	Office Equipment Lab Equip - Hash #post	Water	08/02/13	10	0	3,921	-	3,921	-	3,921	-	(1,340)	-	-	-	-	2,581
20001700	Wadesfield	Shared Assets	Shared Assets	130	Other Tank - Plastic 2,500 gal	Water	02/01/95	50	0	2,404	-	2,404	-	2,404	-	(1,053)	-	-	-	-	1,351
20003811	Wadesfield	Shared Assets	Shared Assets	330	Other Tank - Plastic 1,000 gal	Water	06/01/08	50	0	329	-	329	-	329	-	(91)	-	-	-	-	418
40000119	Wadesfield	Shared Assets	Shared Assets	341	Vehicle/Vehicle - 2011 Ford Ranger	Water	01/03/11	5	0	29,038	-	29,038	-	29,038	-	(29,038)	-	-	-	-	-
60000091	Wadesfield	Shared Assets	Shared Assets	340	Office Equipment DAF Meter Reader	Water	01/01/06	5	0	7,003	-	7,003	-	7,003	-	(7,003)	-	-	-	-	-
60000094	Wadesfield	Shared Assets	Shared Assets	140	Office Equipment Charger Base	Water	02/01/07	5	0	172	-	172	-	172	-	(172)	-	-	-	-	-
60000095	Wadesfield	Shared Assets	Shared Assets	140	Office Equipment Dell Inspiron 360	Water	02/15/10	5	0	1,171	-	1,171	-	1,171	-	(1,171)	-	-	-	-	-
20003395	Wadesfield	1330007	Center Point	143	Pressure Tanks Tap Air Compressor	Water	08/01/03	10	0	3,166	-	3,166	-	3,166	-	(1,166)	-	-	-	-	-
20003691	Wadesfield	1330128	Southern Hills	143	Pressure Tanks Air Compressor	Water	03/12/14	30	0	802	-	802	-	802	-	(78)	-	-	-	-	724
20003639	Wadesfield	1630038	Rocky Creek	143	Pressure Tanks Tap Air Compressor	Water	09/20/11	5	0	1,186	-	1,186	-	1,186	-	(1,186)	-	-	-	-	-
60000096	Wadesfield	Shared Assets	Shared Assets	140	Office Equipment Dell Laptop + Printer	Water	08/22/12	5	0	628	-	628	-	628	-	(553)	-	-	-	-	75
60000097	Wadesfield	Shared Assets	Shared Assets	140	Office Equipment Jetpack Software	Water	12/18/12	5	0	2,410	-	2,410	-	2,410	-	(1,968)	-	-	-	-	442
60000098	Wadesfield	Shared Assets	Shared Assets	340	Office Equipment Copier	Water	08/10/13	10	0	4,437	-	4,437	-	4,437	-	(1,516)	-	-	-	-	2,921
20001723	Wadesfield	1630018	Rocky Creek	146	Walk Upgrade/Engineer/Alarm	Water	06/01/99	50	0	3,544	-	3,544	-	3,544	-	(1,247)	-	-	-	-	2,297

000194

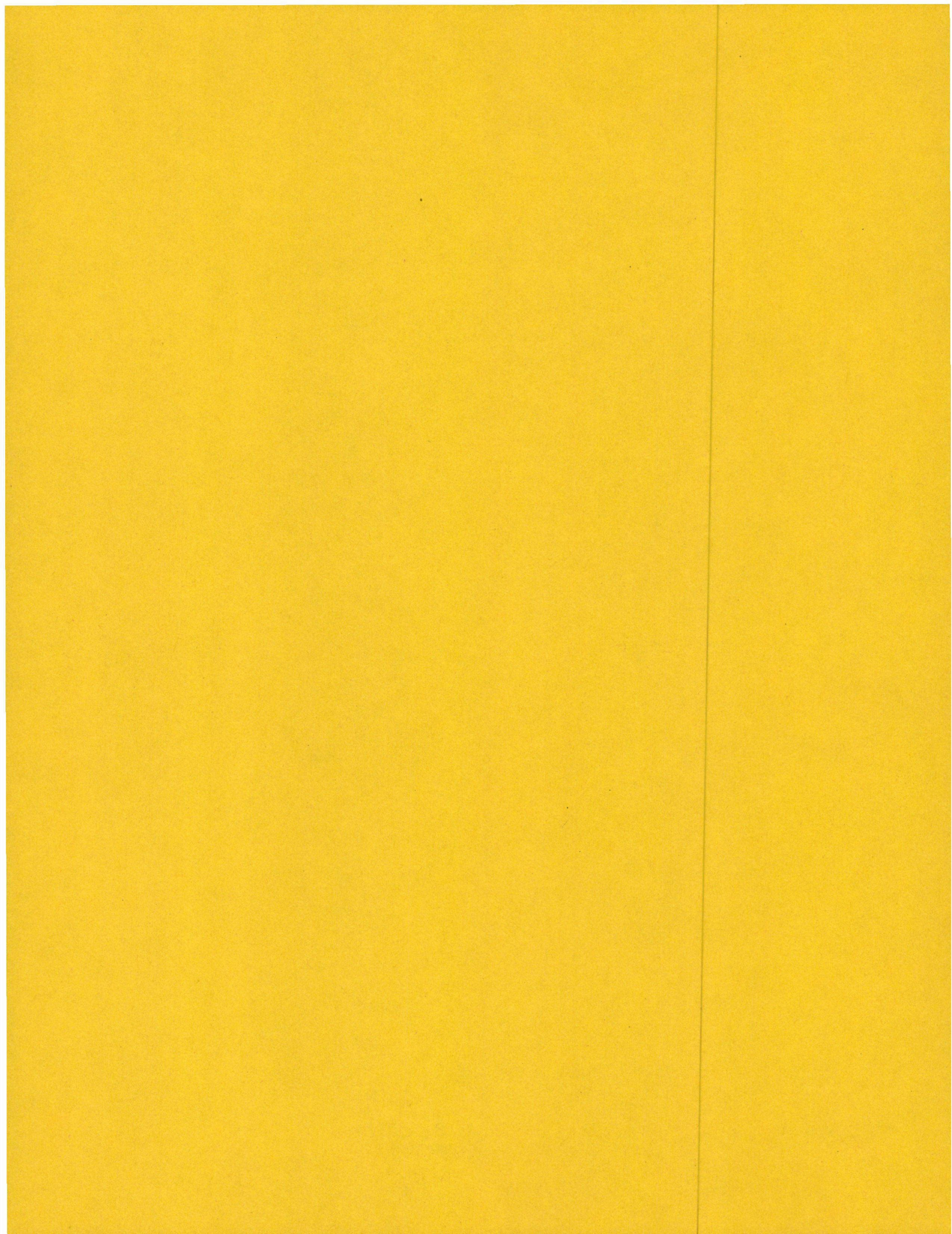
Enforcement Action Status

Part E: Question 18, Part D Question 12



System	Docket No.	Water/Waste water	Violation	Date AO Signed by TCEQ	Original TCEQ Compliance Date	Extension Request Compliance Date	SWWC Compliance Achieved	Notice of Compliance Rec'd by SWWC	Comments
Ridgecrest	2016-0428-PWS-E	Water	HAA5s	10/5/2016	10/11/2017	12/31/2018	11/29/2018	Awaiting NOC from TCEQ	GAC online prior to Q3 compliance sampling
Ridgecrest	2016-0451-PWS-E	Water	TTHMs	9/6/2017	9/6/2018	12/30/2019	10/22/2019		Need to be in compliance Q3 2019 to certify compliance to TCEQ
HVOF & OTSH Combined AO	2018-0506-MLM-E	Wastewater	Effluent Violations	5/8/2019	9/15/2019	12/20/2019	10/22/2019	11/15/2019	Need HVOF to be in compliance 3 consecutive months (Sept - Nov) to certify compliance to TCEQ
Indian Hills Harbor	2019-0429-PWS-E	Water	Plan Review & Booster Pump Capacity	Awaiting TCEQ Signature	TBD	NA	Currently out of compliance		Exception plans submitted by Kimley-Horn Temporary exception granted through 12/31/20

Additional Information
Part E - Question 20



Public Interest Requirement for STM Applications:

Texas Water Code (“TWC”) 13.301(d) requires the Public Utility Commission of Texas (“Commission”) to determine whether a sale serves the public interest.¹ TWC 13.301(e)(5) goes on to state “the utility commission may hold a hearing if there are concerns that the transaction may not serve the public interest, after the application of the considerations provided by Section 13.246(c).” The considerations enumerated in TWC 13.246(c) include adequacy of service, financial ability of the utility to invest in its facilities, and environmental integrity. Of most relevance to the proposed transaction of the instant application, TWC 13.246(c)(8) specifies “the probable improvement of service or lowering of cost to consumers.”

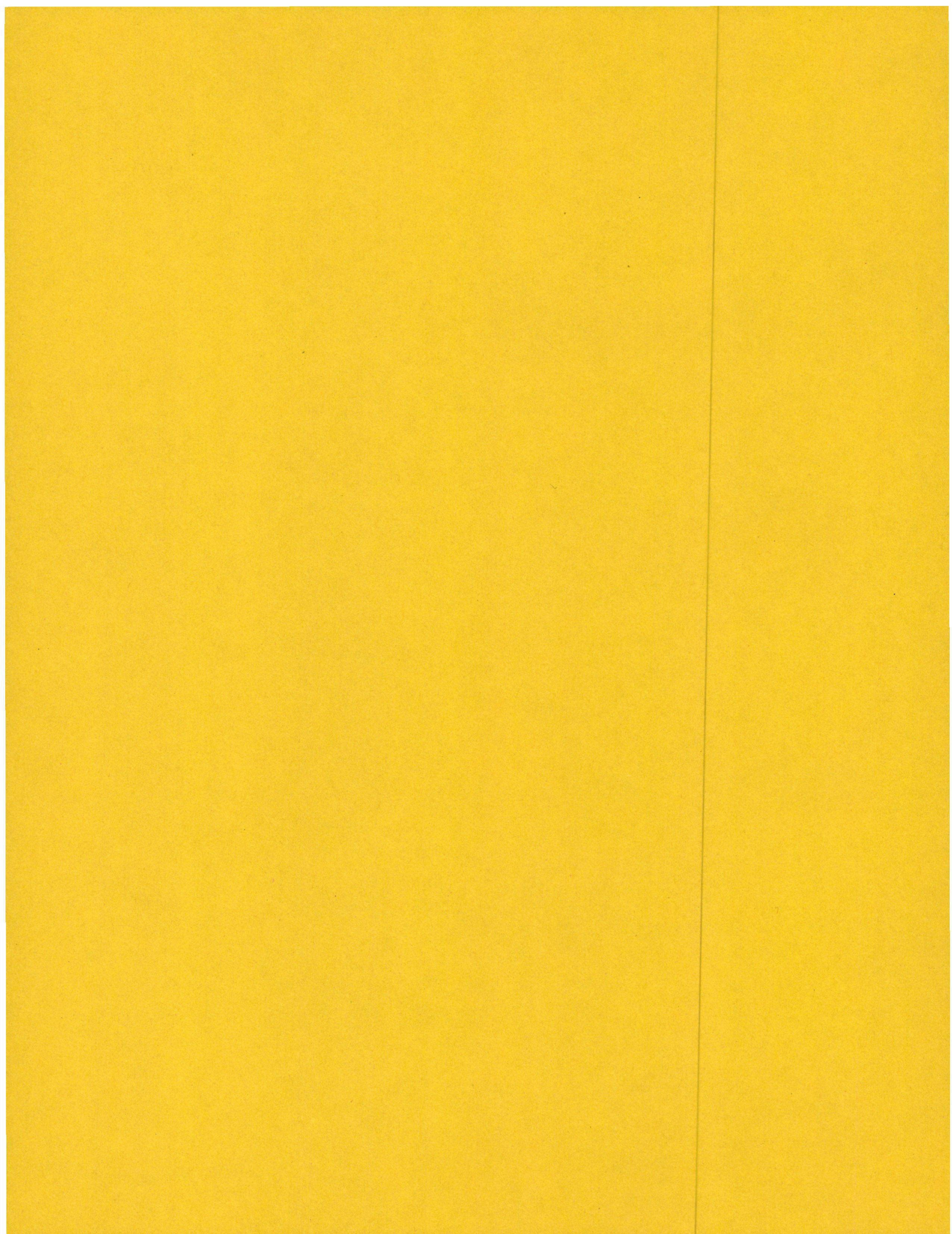
As stated elsewhere in this application, and detailed in a recent general rate case before the Commission, SWWC Utilities, Inc. dba Water Services, Inc. (“Water Services”) currently relies on a shared services model for operations and administrative services. Operational services are provided by employees whose costs are assigned to regional cost centers and either assigned to Water Services when those services can be directly attributable or allocated amongst multiple utilities benefitting from the services. Administrative services are also allocated amongst multiple utilities. This shared services model benefits customers of Water Services through reduced costs due to economies of scale. With this proposed transaction, Water Services will become part of Monarch and rely on Monarch employees for operations, thereby simplifying allocations and reducing administrative costs. The transaction will not result in any disruptions of or deteriorations to service to customers.

While service will not be affected by the transaction, costs to customers will indeed be lowered as a result of the application being approved. Specifically, the cost of preparing and litigating regulatory reports and filings will decrease on a per-customer basis through improved administrative efficiencies and increased customer basis. For example, in the recent Water Services general rate case, \$330,000 of rate case expenses were authorized for recovery from 3,013 environs connections, resulting in a rate case expense per customer of just over \$85. Though not allowed to be recovered from customers as part of a settlement resolving the proceeding, Monarch Utilities I L.P. (“Monarch”) incurred approximately \$1.2 million in rate case expenses for its last general rate case. Given a customer base of 26,412 water and wastewater connection, this results in an approximate per-customer cost of about \$45, almost half that of the Water Services case. Adding the Water Services customer base decreases the cost per customer even more. Similarly, costs of other regulatory filings are decreased on a per-customer basis; therefore, this transaction complies with the public interest consideration of lowering of costs to consumers.

¹ The utility commission shall, with or without a public hearing, investigate the sale, acquisition, lease, or rental to determine whether the transaction will serve the public interest.

List of Neighboring Utilities and Cities

Part E: Question 21



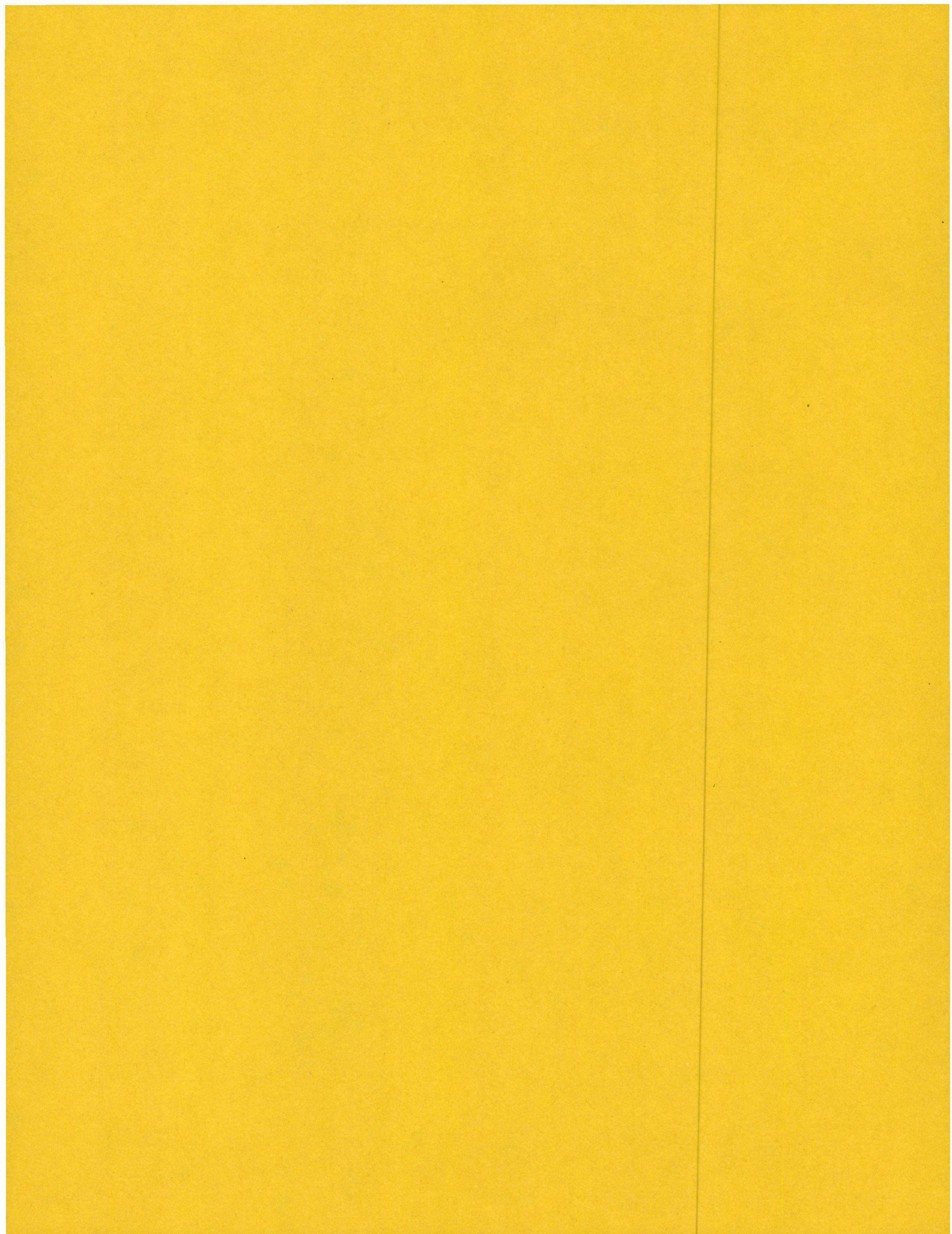
NEIGHBORING UTILITIES AND AFFECTED ENTITIES

3009 Water Company, L.L.C. CCN 13069
Aqua Texas Inc. CCN 12902
Aqua Texas, Inc. CCN 11157
Aqua Utilities CCN 11157
Bandera County
Bandera County River Authority and Groundwater District
Bandera East Utility L.P. CCN 13118
Bandera River Ranch WSC CCN 12262
Barton Springs / Edwards Aquifer Conservation District
B B R Water Company CCN 12857
Boerne Stage Field POA CCN 13189
SJWTX - Canyon Lake Water Service Company, Inc. CCN 10692
Cimarron Park Water Company, Inc. CCN 12140
City of Austin
City of Bandera
City of Buda
City of Bulverde
City of Hays
City of Kerrville
City of Kerrville CCN 12928
City of New Braunfels
Comal County
Comal County WCID No. 6
Comal Trinity Groundwater Conservation District
Cow Creek Groundwater Conservation District
Dillon Water Resources, L.P. CCN 12844
Edwards Aquifer Authority
Elm Ridge Water Company, Inc. CCN 12885
Flying L PUD
Fremont Water Company CCN 11821
Gillespie County
Green Valley SUD CCN 10646
Guadalupe Blanco River Authority CCN 12977
Hays County
Headwaters Groundwater Conservation District
Hill Country Underground Water Conservation District
Hill River Water Works CCN 12939
Ingram Oaks Company Inc. CCN 13134
Johnson Ranch MUD
Kendall County
Kendall County WCID 1 CCN 10685
Kerr County
Kerr County Water Systems LLC CCN 13166
Kerrville South Water Company CCN 11484
Lackland Water Company, LTD CCN 10734

Lange Ranch Subdivision Unit 2 Lot 1
Lower Colorado River Authority
Mary Meade Water Company CCN 11570
Medina County
Medina County Groundwater Conservation District
Oak Forest WSC CCN 13124
Ruby Ranch WSC CCN 12849
San Antonio River Authority
San Antonio Water System CCN 10540
Shalako Estates and Canyon Springs CCN 12685
Sherwood Mt Pisgah WSC CCN 13050
Springs Hill WSC CCN 10666
The Oaks WSC CCN 11581
Verde Hills WSC CCN 12093
Wood Trails Water Supply CCN 11880
Woods WSC CCN 11879
Yancy WSC CCN 11464

TCEQ Compliance Correspondence

Part F: Question 22



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

RECEIVED

March 27, 2017

MAR 30 2017

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Bavarian Hills, Borgfeld Road, Bexar County, Texas
Regulated Entity No.: RN101211605, TCEQ ID No.: 0150235, Investigation No.: 1400616

Dear Mr. Williford:

On January 26, 2017, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/SA/eg

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 14, 2016

RECEIVED

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

DEC 24 2016

TXU - AP

Re: Compliance Evaluation Investigation at:
Cascade Mobile Home Park, IH-10 W .5 mile S of Cascade Caverns Road,
Kendall County, Texas
Regulated Entity No.: RN101227015, TCEQ ID No.: 1300005, Investigation No.: 1375960

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. No violations are being alleged as a result of the investigation.

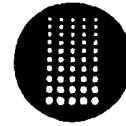
The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg



**Water
Services, Inc.**

A SouthWest Water Company

Customer Service
866.654.SWWC (7992)

December 14, 2016

Ms. Vera Poe, P.E.
TCEQ Team Leader
Utilities Technical Review Team
Water Supply Division, MC-153
PO Box 13087
Austin, Texas 78711-3087

Subject: Water System Improvements
Cascade Mobile Home Park Water System PWS I.D. 1500005
Plan Review Log Number P-07162010-071
Kendall County, Texas

Dear Ms. Poe:

I am writing today to notify the Water Supply Division in accordance with Chapter 30 TAC Section §290.39(h)(3), that the Hydro-pneumatic tank (Vessel) was complete on December 1, 2016 and placed in service benefiting the Cascade Mobile Home Park Service Area.

The Vessel and associated integral controls are operational providing adequate water pressure to the system. The installation was in general compliance with the planning materials approved by TCEQ on July 7, 2010.

If you have questions or require additional information regarding the foregoing, please contact me soon.

Sincerely,

Joe F. Torralva

Design and Construction Manager, Texas Utilities | SouthWest Water Company
1620 Grand Avenue Parkway, STE 140 | Pflugerville, Texas 78660
Tel: 512-219-2260 | Fax: 512-219-2298
E-mail: jtorralva@swwc.com

000206

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 22, 2019

**CERTIFIED MAIL 917199991703923579966
RETURN RECEIPT REQUESTED**

RECEIVED

MAY 24 2019

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities Inc.
1620 Grand Avenue Pkwy, Ste 140
Pflugerville, Texas 78660-2185

Re: Notice of Violation for Comprehensive Compliance Investigation at:
Cedar Springs MHP, 2 miles W of Ingram off HWY 39, Kerr County, Texas
RN101215291, TCEQ PWS ID: 1330019, Investigation No. 1553548

Dear Mr. Williford:

On April 17, 2019, Mr. Chris Friesenhahn of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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, a concern was noted which was an alleged violation. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violation. Therefore, no further action is required; however, an Additional Issue has been cited which requires your attention.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled Obtaining TCEQ Rules (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at (210) 490-3096 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 violation as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner 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 enclosed Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

Mr. Tim Williford
Page 2
May 30, 2019

If you or members of your staff have any questions, please feel free to contact Mr. Friesenhahn in the San Antonio Region Office at (210) 403-4055.

Sincerely,



Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/CMF/sg

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

CEDAR SPRINGS MOBILE HOME VILLAGE	Investigation # 1553548
, KERR COUNTY,	Investigation Date: 04/17/2019
Additional ID(s): 1330019	

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

Track No: 714958

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

Alleged Violation:

Investigation: 1553548

Comment Date: 05/16/2019

Failure to enclose the well with an intruder-resistant fence or a locked ventilated well housing.

At the time of the investigation, the well did not have an intruder-resistant fence nor any housing to ensure against possible contamination or damage to the facilities by trespassers.

30 TAC 290.41(c)(3)(O)--All completed well units shall be protected by intruder-resistant fences, the gates of which are provided with locks or shall be enclosed in locked, ventilated well houses to exclude possible contamination or damage to the facilities by trespassers. The gates or wellhouses shall be locked during periods of darkness and when the plant is unattended.

Recommended Corrective Action: Construct an intruder-resistant fence or well housing to ensure against contamination or vandalism of the well.

To document compliance, submit photographic documentation or a copy of a receipt/invoice indicating that the needed intruder-resistant fence or well house has been constructed to this office by the compliance due date.

Resolution: 04/18/2019--An email from Mr. Amezquita was received which included a photograph of a newly constructed and locked well housing.

ADDITIONAL ISSUES

Description

Additional Comments

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 22, 2016

RECEIVED

AUG 24 2016

TXU - AP

Mr. R. C. Wiedenfeld, President
Wiedenfeld Water Works, Inc.
P. O. Box 418
Center Point, Texas 78010-0418

Re: Comprehensive Compliance Investigation at:
Center Point Wiedenfeld Water Works, W side of Hwy 27 in Center Point, Kerr County,
Texas
Regulated Entity No.: RN101241511, TCEQ ID No.: 1330007, Investigation No.: 1349037

Dear Mr. Wiedenfeld:

On June 22, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

cc: Mr. Gary Rose, Operations Manager, Southwest Water Company

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 14, 2016

RECEIVED

DEC 24 2016

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Coolcrest Water System, 11926 Madrona Drive, San Antonio, Bexar County, Texas
Regulated Entity No.: RN101253227, TCEQ ID No.: 0150046
Investigation No.: 1375966

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 23, 2019

RECEIVED
JUL 24 2019
TXU-AP

Mr. Gary Rose
Operations Manager
SWWC Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

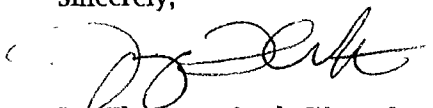
Re: Comprehensive Compliance Investigation at:
Country Springs Water, 26827 Nelson Hill, Bexar County, Texas
Regulated Entity ID No.: RN101186138, TCEQ PWS ID.: 0150421, Investigation No.:
1578372

Dear Mr. Rose:

On June 5, 2019, Mr. Chris Friesenhahn of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mr. Friesenhahn in the San Antonio Region Office at (210)403-4055.

Sincerely,


Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/CMF/sg

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



RECEIVED

FEB 9 2017

TXU - AP

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 3, 2017

CERTIFIED MAIL NO.: 91 7199 9991 7036 8836 8133
RETURN RECEIPT REQUESTED

Mr. Timothy Williford, Environmental Health and Safety Manager
Southwest Utilities, Inc
1620 Grand Avenue Pkwy., Ste. 140
Pflugerville, TX 78660-2185

Re: Notice of Violation for the Comprehensive Compliance Investigation at:
Enchanted River Estates, 114 Chapparral Ct., Bandera County, Texas
Regulated Entity No.: RN101275659, TCEQ ID No.: 0100039
Investigation No.: 1377748

Dear Mr. Williford:

On November 22, 2016, Ms. De'Shaune Blake of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public water supply. Enclosed is a summary which lists the investigation findings. During the investigation, a concern was noted which was an alleged noncompliance that has been resolved based on subsequent corrective action. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violations. Therefore, no further action is required.

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 San Antonio Region Office at (210) 403-4096 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 violation as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner, 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

Mr. Timothy Williford
Page 2
February 3, 2017

included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of the contested violation.

If you or members of your staff have any questions, please feel free to contact Ms. Blake in the San Antonio Region Office at (210) 403-4033.

Sincerely,



Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/db/eg

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

ENCHANTED RIVER ESTATES	Investigation # 1377748
, BANDERA COUNTY,	Investigation Date: 11/22/2016
Additional ID(s): 0100039	

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

Track No: 630679

30 TAC Chapter 290.46(n)(1)

Alleged Violation:

Investigation: 1377748

Comment Date: 01/30/2017

Failure to provide as-built plans or record drawings and specifications for the public water supply.

At the time of the investigation, no as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities, for the water system were provided.

30 TAC 290.46(n)(1)-- Accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank shall be maintained at the public water system until the facility is decommissioned. As-built plans of individual projects may be used to fulfill this requirement if the plans are maintained in an organized manner.

Recommended Corrective Action: Provide by the compliance due date, copies of as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities for the water system.

Resolution: A copy of as built drawings were provided.

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 14, 2016

RECEIVED

DEC 24 2016

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Garden Oaks, S. of New Braunfels on FM 725, New Braunfels, Comal County, Texas
Regulated Entity No.: RN101204634, TCEQ ID No.: 0940030
Investigation No.: 1375963

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 3, 2018

RECEIVED

DEC 10 2018

TXU-AP

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Heritage Park Water Service, 279 Deer Park Lane, Kerr County, Texas
Regulated Entity No.:RN102680717, TCEQ ID No.:1330080, Investigation No.: 1518539

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

Enclosure: Summary of Findings

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 30, 2018

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

RECEIVED
DEC 10 2018
TXU-AP

Re: Compliance Evaluation Investigation at:
Hills and Dales, 124 Hope Lane, Ingram, Kerr County, Texas
Regulated Entity No.: RN101213296, TCEQ ID No.:1330030, Investigation No.: 1518534

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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

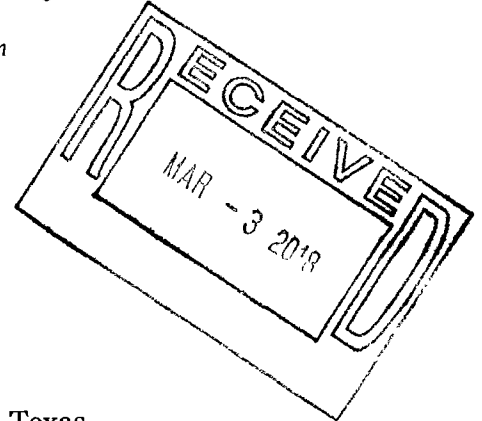


TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 26, 2018

Mr. Tim Williford, Environmental Health and Safety Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy #140
Pflugerville, Texas 78660



Re: Comprehensive Compliance Investigation of:
Huntington Estates Public Water System, Hays County, Texas
PWS ID No.: 1050124; TCEQ Regulated Entity No.: RN102671799
Investigation No.: 1472245

Dear Mr. Williford:

On February 14, 2018, Mr. Brad Monk of the Texas Commission on Environmental Quality (TCEQ) Austin Regional Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water systems. 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 Mr. Monk in the Austin Region Office at (512) 339-2929.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Stewart".

Shawn Stewart
Water Section Manager
Austin Region Office

SS/bm

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

RECEIVED

March 27, 2017

MAR 30 2017

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

TXU - AP

Re: Compliance Evaluation Investigation at:
Bavarian Hills, Borgfeld Road, Bexar County, Texas
Regulated Entity No.: RN101211605, TCEQ ID No.: 0150235, Investigation No.: 1400616

Dear Mr. Williford:

On January 26, 2017, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/SA/eg

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 14, 2016

RECEIVED

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

DEC 24 2016

TXU - AP

Re: Compliance Evaluation Investigation at:
Cascade Mobile Home Park, IH-10 W .5 mile S of Cascade Caverns Road,
Kendall County, Texas
Regulated Entity No.: RN101227015, TCEQ ID No.: 1300005, Investigation No.: 1375960

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. No violations are being alleged as a result of the investigation.

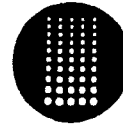
The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg



**Water
Services, Inc.**

A SouthWest Water Company

Customer Service
866.654.SWWC (7992)

December 14, 2016

Ms. Vera Poe, P.E.
TCEQ Team Leader
Utilities Technical Review Team
Water Supply Division, MC-153
PO Box 13087
Austin, Texas 78711-3087

Subject: Water System Improvements
Cascade Mobile Home Park Water System PWS I.D. 1500005
Plan Review Log Number P-07162010-071
Kendall County, Texas

Dear Ms. Poe:

I am writing today to notify the Water Supply Division in accordance with Chapter 30 TAC Section §290.39(h)(3), that the Hydro-pneumatic tank (Vessel) was complete on December 1, 2016 and placed in service benefiting the Cascade Mobile Home Park Service Area.

The Vessel and associated integral controls are operational providing adequate water pressure to the system. The installation was in general compliance with the planning materials approved by TCEQ on July 7, 2010.

If you have questions or require additional information regarding the foregoing, please contact me soon.

Sincerely,

Joe F. Terralva

Design and Construction Manager, Texas Utilities | SouthWest Water Company
1620 Grand Avenue Parkway, STE 140 | Pflugerville, Texas 78660
Tel: 512-219-2260 | Fax: 512-219-2298
E-mail: jtorralva@swwc.com

000222

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 22, 2019

**CERTIFIED MAIL 917199991703923579966
RETURN RECEIPT REQUESTED**

RECEIVED

MAY 24 2019

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities Inc.
1620 Grand Avenue Pkwy, Ste 140
Pflugerville, Texas 78660-2185

Re: Notice of Violation for Comprehensive Compliance Investigation at:
Cedar Springs MHP, 2 miles W of Ingram off HWY 39, Kerr County, Texas
RN101215291, TCEQ PWS ID: 1330019, Investigation No. 1553548

Dear Mr. Williford:

On April 17, 2019, Mr. Chris Friesenhahn of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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, a concern was noted which was an alleged violation. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violation. Therefore, no further action is required; however, an Additional Issue has been cited which requires your attention.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled Obtaining TCEQ Rules (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at (210) 490-3096 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 violation as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumgardner 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 enclosed Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

Mr. Tim Williford
Page 2
May 30, 2019

If you or members of your staff have any questions, please feel free to contact Mr. Friesenhahn in the San Antonio Region Office at (210) 403-4055.

Sincerely,



Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/CMF/sg

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

CEDAR SPRINGS MOBILE HOME VILLAGE	Investigation # 1553548
, KERR COUNTY,	Investigation Date: 04/17/2019
Additional ID(s): 1330019	

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

Track No: 714958

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

Alleged Violation:

Investigation: 1553548

Comment Date: 05/16/2019

Failure to enclose the well with an intruder-resistant fence or a locked ventilated well housing.

At the time of the investigation, the well did not have an intruder-resistant fence nor any housing to ensure against possible contamination or damage to the facilities by trespassers.

30 TAC 290.41(c)(3)(O)--All completed well units shall be protected by intruder-resistant fences, the gates of which are provided with locks or shall be enclosed in locked, ventilated well houses to exclude possible contamination or damage to the facilities by trespassers. The gates or wellhouses shall be locked during periods of darkness and when the plant is unattended.

Recommended Corrective Action: Construct an intruder-resistant fence or well housing to ensure against contamination or vandalism of the well.

To document compliance, submit photographic documentation or a copy of a receipt/invoice indicating that the needed intruder-resistant fence or well house has been constructed to this office by the compliance due date.

Resolution: 04/18/2019--An email from Mr. Amezquita was received which included a photograph of a newly constructed and locked well housing.

ADDITIONAL ISSUES

Description

Additional Comments

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 22, 2016

RECEIVED

AUG 24 2016

TXU - AP

Mr. R. C. Wiedenfeld, President
Wiedenfeld Water Works, Inc.
P. O. Box 418
Center Point, Texas 78010-0418

Re: Comprehensive Compliance Investigation at:
Center Point Wiedenfeld Water Works, W side of Hwy 27 in Center Point, Kerr County,
Texas
Regulated Entity No.: RN101241511, TCEQ ID No.: 1330007, Investigation No.: 1349037

Dear Mr. Wiedenfeld:

On June 22, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

cc: Mr. Gary Rose, Operations Manager, Southwest Water Company

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 14, 2016

RECEIVED

DEC 24 2016

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Coolcrest Water System, 11926 Madrona Drive, San Antonio, Bexar County, Texas
Regulated Entity No.: RN101253227, TCEQ ID No.: 0150046
Investigation No.: 1375966

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 23, 2019

RECEIVED
JUL 24 2019
TXU-AP

Mr. Gary Rose
Operations Manager
SWWC Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

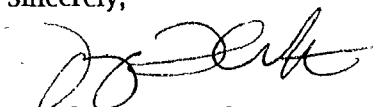
Re: Comprehensive Compliance Investigation at:
Country Springs Water, 26827 Nelson Hill, Bexar County, Texas
Regulated Entity ID No.: RN101186138, TCEQ PWS ID.: 0150421, Investigation No.:
1578372

Dear Mr. Rose:

On June 5, 2019, Mr. Chris Friesenhahn of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mr. Friesenhahn in the San Antonio Region Office at (210)403-4055.

Sincerely,


Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/CMF/sg

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



RECEIVED

FEB 9 2017

TXU - AP

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 3, 2017

CERTIFIED MAIL NO.: 91 7199 9991 7036 8836 8133
RETURN RECEIPT REQUESTED

Mr. Timothy Williford, Environmental Health and Safety Manager
Southwest Utilities, Inc
1620 Grand Avenue Pkwy., Ste. 140
Pflugerville, TX 78660-2185

Re: Notice of Violation for the Comprehensive Compliance Investigation at:
Enchanted River Estates, 114 Chapparral Ct., Bandera County, Texas
Regulated Entity No.: RN101275659, TCEQ ID No.: 0100039
Investigation No.: 1377748

Dear Mr. Williford:

On November 22, 2016, Ms. De'Shaune Blake of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public water supply. Enclosed is a summary which lists the investigation findings. During the investigation, a concern was noted which was an alleged noncompliance that has been resolved based on subsequent corrective action. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violations. Therefore, no further action is required.

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 San Antonio Region Office at (210) 403-4096 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 violation as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner, 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

Mr. Timothy Williford
Page 2
February 3, 2017

included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of the contested violation.

If you or members of your staff have any questions, please feel free to contact Ms. Blake in the San Antonio Region Office at (210) 403-4033.

Sincerely,



Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/db/eg

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

ENCHANTED RIVER ESTATES	Investigation # 1377748
, BANDERA COUNTY,	Investigation Date: 11/22/2016
Additional ID(s): 0100039	

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

Track No: 630679

30 TAC Chapter 290.46(n)(1)

Alleged Violation:

Investigation: 1377748

Comment Date: 01/30/2017

Failure to provide as-built plans or record drawings and specifications for the public water supply.

At the time of the investigation, no as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities, for the water system were provided.

30 TAC 290.46(n)(1)-- Accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank shall be maintained at the public water system until the facility is decommissioned. As-built plans of individual projects may be used to fulfill this requirement if the plans are maintained in an organized manner.

Recommended Corrective Action: Provide by the compliance due date, copies of as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities for the water system.

Resolution: A copy of as built drawings were provided.

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 14, 2016

RECEIVED

DEC 24 2016

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Garden Oaks, S. of New Braunfels on FM 725, New Braunfels, Comal County, Texas
Regulated Entity No.: RN101204634, TCEQ ID No.: 0940030
Investigation No.: 1375963

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 3, 2018

RECEIVED

DEC 10 2018

TXU-AP

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Heritage Park Water Service, 279 Deer Park Lane, Kerr County, Texas
Regulated Entity No.:RN102680717, TCEQ ID No.:1330080, Investigation No.: 1518539

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

Enclosure: Summary of Findings

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 30, 2018

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

RECEIVED
DEC 10 2018
TXU-AP

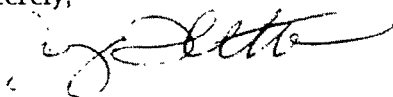
Re: Compliance Evaluation Investigation at:
Hills and Dales, 124 Hope Lane, Ingram, Kerr County, Texas
Regulated Entity No.: RN101213296, TCEQ ID No.:1330030, Investigation No.: 1518534

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,


Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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

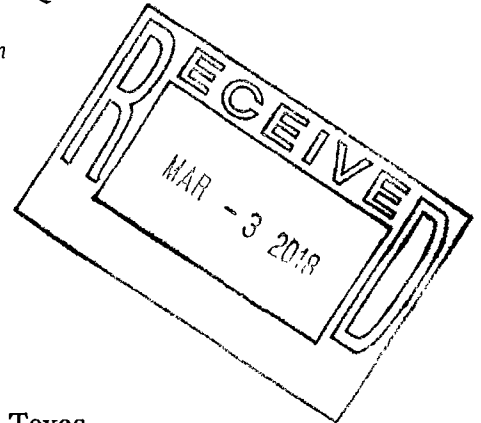


TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 26, 2018

Mr. Tim Williford, Environmental Health and Safety Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy #140
Pflugerville, Texas 78660



Re: Comprehensive Compliance Investigation of:
Huntington Estates Public Water System, Hays County, Texas
PWS ID No.: 1050124; TCEQ Regulated Entity No.: RN102671799
Investigation No.: 1472245

Dear Mr. Williford:

On February 14, 2018, Mr. Brad Monk of the Texas Commission on Environmental Quality (TCEQ) Austin Regional Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water systems. 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 Mr. Monk in the Austin Region Office at (512) 339-2929.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Stewart".

Shawn Stewart
Water Section Manager
Austin Region Office

SS/bm

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

July 8, 2016

Mr. Raymond Wiedenfeld, President
Wiedenfeld Water Works, Inc.
P. O. Box 418
Center Point, Texas 78010-0418

RECEIVED

JUL 11 2016

Re: Notice of Violation for Compliance Evaluation Investigation at:
Oak Ridge Estates, Kerr County, Texas
Regulated Entity No.: RN101284438, TCEQ ID No.: 1330134
Investigation: 1338714

TXU - AP

Dear Mr. Wiedenfeld:

On April 25-26, 2016, Mr. Colby Maron of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for 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 based on subsequent corrective action. Therefore, no further action is required; however please see the enclosed additional issue.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled Obtaining TCEQ Rules (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at (210) 403-4096 or the Central Office Publications Ordering Team at 512-239-0028.

If you or members of your staff have any questions, please feel free to contact Mr. Maron in the San Antonio Region Office at (210) 403-4024.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/CM/eg

cc: Mr. Tim Williford, South West Water Company

Summary of Investigation Findings

OAK RIDGE ESTATES WATER SYSTEM	Investigation # 1338714
, KERR COUNTY,	Investigation Date: 04/25/2016
Additional ID(s): 1330134	

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

Track No: 607471

30 TAC Chapter 290.43(c)(3)

Alleged Violation:

Investigation: 1338714

Comment Date: 06/17/2016

Failure to provide a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device on the storage tank overflow.

At the time of the investigation, the overflow discharge opening did not have a cover.

290.43(c)(3) - Overflows shall be designed in strict accordance with current AWWA standards. If the overflow terminates at any point other than the ground level, it shall be located near enough and at a position accessible from a ladder or the balcony for inspection purposes. The overflow(s) shall be sized to handle the maximum possible fill rate without exceeding the capacity of the overflow(s). The discharge opening of the overflow(s) shall be above the surface of the ground and shall not be subject to submergence. The discharge opening shall be covered with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device to prevent the entrance of insects and other nuisances. When the tank is not overflowing, the cover shall close automatically and fit tightly with no gap over 1/16 inch.

Recommended Corrective Action: Provide by the compliance due date, a completed work order, invoice or photographs indicating the overflow discharge opening has been covered.

Resolution: 05/16/2016- Photographs indicating that covers had been installed were received.

ADDITIONAL ISSUES

Description
Item 2

Additional Comments

At the time of the investigation, it was noted that livestock watering troughs and above ground pools were located at residential connections but the status of backflow and cross-connection prevention could not be determined. The entity must ensure that the potential contamination hazards are evaluated, and if necessary, eliminated or isolated from the public water system.

Item 3

30 TAC§ 291.93(3)

At the time of the investigation, it was noted that the entity has reached 88% of its service pump capacity. This was based upon 44 connections. The entity must submit to the Texas Commission on Environmental Quality (TCEQ) Utility Technical Review Team, MC 159, PO Box 13087, Austin, TX 78711-3087; (512)239-4691 an 85% 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 and submit to the TCEQ San Antonio Region Office documentation verifying submittal.

30 TAC 290.93(3)-- After any commission field inspection, a retail public utility must analyze the system's capacity to determine if it has reached 85% of its capacity. If the retail public utility has reached 85% of its capacity, it must file this report no later than 90 days after the date of a commission letter detailing the results of the inspection. Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage, or pumping. The report should be submitted in writing and should contain the following: a brief description of the overall utility system and service area; an analysis of the plant capacity as defined in subparagraph (A) of this paragraph; details on how the retail public utility will provide service to the remaining areas within the boundaries of its certificated area. This includes projections of cost and expected design and installation dates for additional facilities.

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



RECEIVED
OCT 22 2018
TXU-AP

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 18, 2018

Mr. Timothy Williford
Compliance Manager
Southwest Water Utilities, Inc.
1620 Grand Avenue Pkwy Suite 140
Pflugerville, Texas 78660-2185

Re: Notice of Complaint Investigation at:
Oak Village North, 2 miles E of Bulverde on FM 1863, Comal County, Texas
Regulated Entity No.:RN101268449, TCEQ ID No.: 0460037, Investigation No.: 1512557
Incident Nos: 288274, 288275, 288091, 288129, 291965

Dear Mr. Williford:

On July 11-12, 2018 & September 9, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Stacy Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 11, 2019

RECEIVED

JAN 19 2019

TXU-AF

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Oaks North Mobile Home Estates, 1240 Coshise Trail, Bexar County, Texas
Regulated Entity No.: RN101248953, TCEQ ID No.: 0150135, Investigation No.: 1518527

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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 14, 2016

RECEIVED

DEC 24 2016

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Oakview Water System, 1568 Cain City Rd; Fredericksburg, Gillespie County, Texas
Regulated Entity No.: RN101241669, TCEQ ID No.: 0860107
Investigation No.: 1375968

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 22, 2019

RECEIVED

Mr. Tim Williford
Compliance Manager
SWWC Utilities Inc.
1620 Grand Avenue Pkwy, Ste 140
Pflugerville, Texas 78660-2185

MAY 25 2019

TXU-AP

Re: Comprehensive Compliance Investigation at:
Platten Creek Water System, approx. 6.4 miles N of Sisterdale on E side of FM 1376,
Kendall County, Texas
Regulated Entity: RN101206829, TCEQ PWS ID: 1300035, Investigation No. 1553547

Dear Mr. Williford:

On April 17, 2019, Mr. Chris Friesenhahn of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mr. Friesenhahn in the San Antonio Region Office at (210) 403-4055.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/CMF/sg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 30, 2018

Mr. Tim Williford
Environmental Manager
SWWC Utilities Inc.
16250 Grand Avenue, Parkway Site 140
Pflugerville, Texas 78660-2185

RECEIVED

DEC 3 2018

TXU-AP

Re: Compliance Evaluation Investigation at:
Rim Rock Ranch Public Water Supply, 6285 Derbyway, Bulverde, Comal County, Texas,
78660-2185
Regulated Entity No.: RN101459246, TCEQ ID No:0460211,
Investigation No.: 1519055

Dear Mr. Williford:

On October 10, 2018, Mr. Aaron Rodriguez of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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, please feel free to contact Mr. Rodriguez in the San Antonio Region Office at (210) 403-4065.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/AR/eg

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

January 27, 2017

RECEIVED

FEB 6 2017

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

TXU - AP

Re: Compliance Evaluation Investigation at:
River Bend Estates, 160 Riverbend Rd., Bandera, Bandera County, Texas
Regulated Entity No.: RN101221257, TCEQ ID No.: 0100042, Investigation No.: 1375958

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 23, 2019

RECEIVED

JUL 24 2019

TXU-AP

Mr. Tim Williford
Environmental Manager
SWWC Utilities Inc.
1620 Grand Avenue., Suite 140
Pflugerville, Texas 78660-2185

Re: Comprehensive Compliance Investigation at:
Rocky Creek Subdivision Water System, located on the southwest side of Medina Lake of
CR 266 and FM 2676, Medina County, Texas,
Regulated Entity No.: RN102676459, TCEQ ID No.:01630038, Investigation No.: 1557804

Dear Mr. Williford:

On May 23, 2019, Mr. Aaron Rodriguez of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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, please feel free to contact Mr. Rodriguez in the San Antonio Region Office at (210) 403-4065.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/AR/sg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 10, 2019

RECEIVED

APR 15 2019

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

Re: Compliance Evaluation Investigation at:
Southern Hills; Located 4 miles south of Kerrville off Hwy 16, Kerr County, Texas
Regulated Entity No.: RN101224384, TCEQ Additional ID: 1330128, Investigation No.:
1532011, Incident No.: 295825

Dear Mr. Williford,

On December 13, 2018, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. No violations are being alleged as a result of the investigation, however please see the Additional Issue.

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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/adj

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

SOUTHERN HILLS	Investigation # 1532011
, KERR COUNTY,	Investigation Date: 12/13/2018
Additional ID(s): 1330128	

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 606719

30 TAC Chapter 290.45(b)(1)(D)(iii)

Alleged Violation:

Investigation: 1336511

Comment Date: 06/10/2016

Failure to provide at least 2.0 GPM per service connection of service pump capacity.

At the time of the investigation, the water system relied on 290.45(b)(1)(D)(iii) and the presense of elevated storage to reduce the minimum required service pump capacity to be reduced from 2.0 GPM per connection to 0.6 GPM per connection. The elevated ground storage tank at the Monte Bello plant provide 6,800 gallons of elevated storage after the ground storage requirements for the 6 connections on the upper pressure plane were accounted for. According to 290.45(b)(1)(D)(iii), in order to qualify for reduced service pump capacity, the elevated storage must provide 200 gallons per connection. The elevated capacity of 6,800 was used to account for 34 of the 284 connections on the lower pressure plane. The resulting 250 connections required 2.0 GPM per connection and requiring at least 500 GPM of service pump capacity. After the 34 connections were accounted for in the service pump capacity (20.4 GPM), the water system produced 299.6 GPM and was at a deficit of 200.4 GPM, or 38.5% deficient on the lower pressure plane.

290.45(b)(1)(D)(iii) two or more pumps that have a total capacity of 2.0 gpm per connection or that have a total capacity of at least 1,000 gpm and the ability to meet peak hourly demands with the largest pump out of service, whichever is less, at each pump station or pressure plane. For systems which provide an elevated storage capacity of 200 gallons per connection, two service pumps with a minimum combined capacity of 0.6 gpm per connection are required at each pump station or pressure plane. If only wells and elevated storage are provided, service pumps are not required;

Investigation: 1421630

Comment Date: 08/23/2017

On June 29, 2017 the TCEQ received a request for a 365 day extension. The entity will be granted an additional 90 day extension to document that a compliance plan has been developed and submitted for UTRT approval.

Investigation: 1467363

Comment Date: 02/15/2018

This violation remains outstanding. However, Southwest Water Company is working with TCEQ Plan Review.

Investigation: 1532011

Comment Date: 02/26/2019

This violation is being resolved as a result of the compliance documentation received by the TCEQ San Antonio Region Office July 17, 2018 and December 7, 2018. A Supplemental Engineering Report and service pump upgrade at Madrona Water Plant were approved for construction by TCEQ Plan Review Team by letters dated May 23, 2018 and November 9, 2018.

Recommended Corrective Action: Provide by the compliance due date, completed work orders, invoices and/or photographs indicating that larger capacity service pumps have been installed, the elevated storage capacity has been increased in size to accomodate the active connections and/or that an Alternative Capacity Requirement has been granted.

The addition of a well or any other significant changes to the water system facilities requires

submittal and approval of engineering plans by the TCEQ Utilities Technical Review Team (Phone No. 512-239-4691). All submittals shall be mailed to:

TCEQ
Utilities Technical Review Team, MC 159
PO BOX 13087
Austin, Texas 78711-3087

ACR requests must be submitted to the TCEQ Technical Review and Oversight Team (Phone No. 512-239-4691) for review and approval. All requests must be submitted to:

TCEQ
Technical Review and Oversight Team, MC 159
PO BOX 13087
Austin, Texas 78711-3087

Resolution: This violation is being resolved as a result of the compliance documentation received by the TCEQ San Antonio Region Office July 17, 2018 and December 7, 2018. A Supplemental Engineering Report and service pump upgrade at Madrona Water Plant were approved for construction by TCEQ Plan Review Team by letters dated May 23, 2018 and November 9, 2018.

ADDITIONAL ISSUES

Description
Item #2

Additional Comments

The entity was issued an approval letter dated 06/21/2010, to construct Well #4. However, approval for use of the well as a public water system was not obtained. The TCEQ is aware that the current system owner obtained the PWS in 2016, however please be advised that according to 30 TAC 290.41(c)(3)(A) the entity is required to obtain approval for the use of the well as a public water system source.

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



RECEIVED

FEB 9 2017

TXU - AP

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 6, 2017

CERTIFIED MAIL NO.: 91 7199 9991 7036 8836 8126
RETURN RECEIPT REQUESTED

Mr. Timothy Williford, Environmental Health and Safety Manager
Southwest Utilities, Inc
1620 Grand Avenue Pkwy., Ste. 140
Pflugerville, TX 78660-2185

Re: Notice of Violation for the Comprehensive Compliance Investigation at:
Stage Coach Hills, 25097 Broad Oak Tr., San Antonio, Bexar County, Texas
Regulated Entity No.: RN101186344, TCEQ ID No.: 0150096
Investigation No.: 1377749

Dear Mr. Williford:

On November 22, 2016, Ms. De'Shaune Blake of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for 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 based on subsequent corrective action. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violations. Therefore, no further action is required.

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 San Antonio Region Office at (210) 403-4096 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 San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner, 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

Mr. Timothy Williford
Page 2
February 3, 2017

included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Blake in the San Antonio Region Office at (210) 403-4033.

Sincerely,



Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/db/eg

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

STAGE COACH HILLS	Investigation # 1377749
, BEXAR COUNTY,	Investigation Date: 11/22/2016
Additional ID(s): 0150096	

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

Track No: 630683

30 TAC Chapter 290.46(n)(1)

Alleged Violation:

Investigation: 1377749

Comment Date: 01/30/2017

Failure to provide as-built plans or record drawings and specifications for the public water supply.

At the time of the investigation, no as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities, for the water system were provided.

30 TAC 290.46(n)(1)-- Accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank shall be maintained at the public water system until the facility is decommissioned. As-built plans of individual projects may be used to fulfill this requirement if the plans are maintained in an organized manner.

Recommended Corrective Action: Provide by the compliance due date, copies of as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities for the water system.

Resolution: A copy of as-built drawings were provided.

AREA OF CONCERN

Track No: 630682

30 TAC Chapter 290.42(l)

Alleged Violation:

Investigation: 1377749

Comment Date: 01/30/2017

Failure to provide an updated plant operations manual.

At the time of the investigation, no information regarding the standpipe was provided in the plant operations manual.

30 TAC 290.42(l)-- Plant operations manual. A thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, 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: Provide by the compliance due date, a copy of an updated plant operations manual that indicates it has been compiled in accordance with requirements.

Resolution: A copy of an updated plant operations manual was provided.

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 21, 2018

RECEIVED

DEC 3 2018

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

Re: Compliance Evaluation Investigation at:
Verde Park Estates; Located 1 mile west of Center Point on FM 490, Kerr County, Texas
Regulated Entity No.: RN101210961, TCEQ Additional ID: 1330027, Investigation No.:
1523789

Dear Mr. Williford:

On October 18, 2018, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 20, 2018

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

RECEIVED
DEC 3 2018
TXU-AP

Re: Compliance Evaluation Investigation at:
Vista Hills; Located at 125 Vista Hills Drive, Kerr County, Texas
Regulated Entity No.: RN105915359, TCEQ Additional ID: 1330169, Investigation No.:
1523788

Dear Mr. Williford:

On October 18, 2018, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. No violations are being alleged as a result of the investigation, however please see the Additional Issue.

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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/eg

Summary of Investigation Findings

VISTA HILLS	Investigation # 1523788
, COUNTY,	Investigation Date: 10/18/2018
Additional ID(s): 1330169	

No Violations Associated to this Investigation

ADDITIONAL ISSUES

Description
Item #1

Additional Comments

Please be advised that the maintenance and housekeeping practices used by a public water system shall ensure the good working condition and general appearance of the system's facilities and equipment. The grounds and facilities shall be maintained in a manner so as to minimize the possibility of the harboring of rodents, insects, and other disease vectors, and in such a way as to prevent other conditions that might cause the contamination of the water.

At the time of the investigation, several cracks were noted on the masonry tank. The entity stated that the system's storage tanks were going to be replaced in the nearest future.

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

May 26, 2016

Mr. Gary Rose, Operations Manager
Southwest Water Company
1620 Grand Avenue Parkway, Ste., 140
Pflugerville, Texas 78660

Re: Comprehensive Compliance Investigation at:
Westwood Park Subdivision, .5 mile W of Comfort off Hwy 27, Kerr County,
Texas
Regulated Entity No.: RN101285476
TCEQ ID No.: 1330015, Investigation No.: 1323105

Dear Mr. Rose:

On March 24, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



W WOK

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 25, 2019

RECEIVED

APR 27 2019

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

Re: Compliance Evaluation Investigation at: Westwood Park Subdivision;
Located 0.5 miles west of Comfort off Hwy 27, Kerr County, Texas
Regulated Entity No.: RN101285476, TCEQ Additional ID: 1330015, Investigation No.:
1553430

Dear Mr. Williford,

On March 26, 2019, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/adj

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 23, 2019

CERTIFIED MAIL 9171999991703923560353
RETURN RECEIPT REQUESTED

Mr. Timothy Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue, Pkwy., Ste. 140
Pflugerville, TX 78660-2185

Re: Notice of Violation for the Comprehensive Compliance Investigation at:
Windmill Ranch Subdivision, off of Hwy. 46 W. of Hwy. 281, Bulverde, Comal County,
Texas, Regulated Entity No.: RN101176931, TCEQ ID No.: 0460221
Investigation No.: 1578331

Dear Mr. Williford:

On June 18, 2019, Ms. De'Shaune Blake of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public water supply. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **December 23, 2019**, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

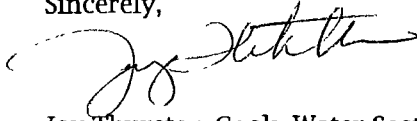
In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at (210) 403-4096 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 San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner, 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 enclosed Summary of Investigation Findings until an official decision is made regarding the status of the contested violation.

Mr. Timothy Williford
Page 2
August 23, 2019

If you or members of your staff have any questions, please feel free to contact Ms. De'Shaune Blake in the San Antonio Region Office at (210) 403-4033.

Sincerely,



Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/DB/sg

Enclosures: Summary of Investigation Findings

Summary of Investigation Findings

WINDMILL RANCH SUBDIVISION

Investigation #
1578331
Investigation Date: 06/18/2019

, COMAL COUNTY,

Additional ID(s): 0460221

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

Track No: 724494 Compliance Due Date: 12/23/2019

30 TAC Chapter 290.46(n)(1)

Alleged Violation:

Investigation: 1578331

Comment Date: 08/15/2019

Failure to maintain accurate and up-to-date as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank.

At the time of the investigation, it was documented that the water system was not maintaining accurate and up-to-date detailed as-built plans or record drawings at the public water system.

30 TAC 290.46(n)(1)-- Accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank shall be maintained at the public water system until the facility is decommissioned. As-built plans of individual projects may be used to fulfill this requirement if the plans are maintained in an organized manner.

Recommended Corrective Action: Provide by the compliance due date, as-built plans or record drawings and specifications for the treatment plants, pump stations, and storage tanks and written documentation indicating that they are being maintained at the public water system.

Track No: 724495 Compliance Due Date: 12/23/2019

30 TAC Chapter 290.41(c)(1)(F)

Alleged Violation:

Investigation: 1578331

Comment Date: 08/15/2019

Failure to provide for the wells, sanitary control easement, approved substitutes or exceptions to the requirement.

At the time of the investigation, a sanitary control easement was provided for well #1 (Windmill Ranch); however, the map indicates that there are five properties within a 150-foot radius of well #1, and only one signed sanitary control easement was provided. No sanitary control easements were provided for well #2 (Creekside Business Park) and well #3 (Kestrel Air Park Subdivision), approved substitute or exception to the requirement were provided for the well.

30 TAC 290.41(c)(1)(F)-- A sanitary control easement or sanitary control easements covering land within 150 feet of the well, or executive director approval for a substitute authorized by this subparagraph, shall be obtained.

Recommended Corrective Action: Provide by the compliance due date, copies of the sanitary control easements, approved substitutes or request an exception by writing to the TCEQ, Technical Review and Oversight Team (TROT) at MC 159, P.O. Box 13087, Austin, TX 78711-3087, and provide a copy of the granted exception to the TCEQ San Antonio Region Office.

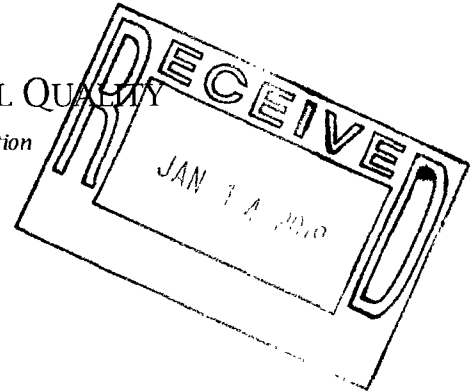
Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 8, 2019



Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Windwood Oaks Water System, 122 Windwood Road, Kerr County, Texas
Regulated Entity No.: RN102681996, TCEQ ID No.:1330141, Investigation No.: 1518538

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

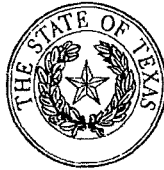
Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 25, 2019

RECEIVED

FEB - 2 2019

TXU-AP

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Woodhaven Mobile Home Park, 107 Chole Lane, Kerr County, Texas
Regulated Entity No.: RN 101266070, TCEQ ID No.: 1330024, Investigation No.: 1518537

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/SA/eg

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

July 8, 2016

Mr. Raymond Wiedenfeld, President
Wiedenfeld Water Works, Inc.
P. O. Box 418
Center Point, Texas 78010-0418

RECEIVED

JUL 11 2016

Re: Notice of Violation for Compliance Evaluation Investigation at:
Oak Ridge Estates, Kerr County, Texas
Regulated Entity No.: RN101284438, TCEQ ID No.: 1330134
Investigation: 1338714

TXU - AP

Dear Mr. Wiedenfeld:

On April 25-26, 2016, Mr. Colby Maron of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for 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 based on subsequent corrective action. Therefore, no further action is required; however please see the enclosed additional issue.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled Obtaining TCEQ Rules (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at (210) 403-4096 or the Central Office Publications Ordering Team at 512-239-0028.

If you or members of your staff have any questions, please feel free to contact Mr. Maron in the San Antonio Region Office at (210) 403-4024.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/CM/eg

cc: Mr. Tim Williford, South West Water Company

Summary of Investigation Findings

OAK RIDGE ESTATES WATER SYSTEM	Investigation # 1338714
, KERR COUNTY,	Investigation Date: 04/25/2016
Additional ID(s): 1330134	

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

Track No: 607471

30 TAC Chapter 290.43(c)(3)

Alleged Violation:

Investigation: 1338714

Comment Date: 06/17/2016

Failure to provide a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device on the storage tank overflow.

At the time of the investigation, the overflow discharge opening did not have a cover.

290.43(c)(3) - Overflows shall be designed in strict accordance with current AWWA standards. If the overflow terminates at any point other than the ground level, it shall be located near enough and at a position accessible from a ladder or the balcony for inspection purposes. The overflow(s) shall be sized to handle the maximum possible fill rate without exceeding the capacity of the overflow(s). The discharge opening of the overflow(s) shall be above the surface of the ground and shall not be subject to submergence. The discharge opening shall be covered with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device to prevent the entrance of insects and other nuisances. When the tank is not overflowing, the cover shall close automatically and fit tightly with no gap over 1/16 inch.

Recommended Corrective Action: Provide by the compliance due date, a completed work order, invoice or photographs indicating the overflow discharge opening has been covered.

Resolution: 05/16/2016- Photographs indicating that covers had been installed were received.

ADDITIONAL ISSUES

Description

Item 2

Additional Comments

At the time of the investigation, it was noted that livestock watering troughs and above ground pools were located at residential connections but the status of backflow and cross-connection prevention could not be determined. The entity must ensure that the potential contamination hazards are evaluated, and if necessary, eliminated or isolated from the public water system.

At the time of the investigation, it was noted that the entity has reached 88% of its service pump capacity. This was based upon 44 connections. The entity must submit to the Texas Commission on Environmental Quality (TCEQ) Utility Technical Review Team, MC 159, PO Box 13087, Austin, TX 78711-3087; (512)239-4691 an 85% 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 and submit to the TCEQ San Antonio Region Office documentation verifying submittal.

30 TAC 290.93(3)-- After any commission field inspection, a retail public utility must analyze the system's capacity to determine if it has reached 85% of its capacity. If the retail public utility has reached 85% of its capacity, it must file this report no later than 90 days after the date of a commission letter detailing the results of the inspection. Capacity is considered to be the overall rated capacity in number of residential connection equivalents based on the most restrictive criteria for production, treatment, storage, or pumping. The report should be submitted in writing and should contain the following: a brief description of the overall utility system and service area; an analysis of the plant capacity as defined in subparagraph (A) of this paragraph; details on how the retail public utility will provide service to the remaining areas within the boundaries of its certificated area. This includes projections of cost and expected design and installation dates for additional facilities.

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



RECEIVED
OCT 22 2018
TXU-AP

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 18, 2018

Mr. Timothy Williford
Compliance Manager
Southwest Water Utilities, Inc.
1620 Grand Avenue Pkwy Suite 140
Pflugerville, Texas 78660-2185

Re: Notice of Complaint Investigation at:
Oak Village North, 2 miles E of Bulverde on FM 1863, Comal County, Texas
Regulated Entity No.:RN101268449, TCEQ ID No.: 0460037, Investigation No.: 1512557
Incident Nos: 288274, 288275, 288091, 288129, 291965

Dear Mr. Williford:

On July 11-12, 2018 & September 9, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Stacy Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 11, 2019

RECEIVED

JAN 19 2019

TXU-AF

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Oaks North Mobile Home Estates, 1240 Coshise Trail, Bexar County, Texas
Regulated Entity No.: RN101248953, TCEQ ID No.: 0150135, Investigation No.: 1518527

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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 14, 2016

RECEIVED

DEC 24 2016

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Oakview Water System, 1568 Cain City Rd; Fredericksburg, Gillespie County, Texas
Regulated Entity No.: RN101241669, TCEQ ID No.: 0860107
Investigation No.: 1375968

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 22, 2019

RECEIVED

Mr. Tim Williford
Compliance Manager
SWWC Utilities Inc.
1620 Grand Avenue Pkwy, Ste 140
Pflugerville, Texas 78660-2185

MAY 25 2019

TXU-AP

Re: Comprehensive Compliance Investigation at:
Platten Creek Water System, approx. 6.4 miles N of Sisterdale on E side of FM 1376,
Kendall County, Texas
Regulated Entity: RN101206829, TCEQ PWS ID: 1300035, Investigation No. 1553547

Dear Mr. Williford:

On April 17, 2019, Mr. Chris Friesenhahn of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mr. Friesenhahn in the San Antonio Region Office at (210) 403-4055.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/CMF/sg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 30, 2018

Mr. Tim Williford
Environmental Manager
SWWC Utilities Inc.
16250 Grand Avenue, Parkway Site 140
Pflugerville, Texas 78660-2185

RECEIVED

DEC 3 2018

TXU-AP

Re: Compliance Evaluation Investigation at:
Rim Rock Ranch Public Water Supply, 6285 Derbyway, Bulverde, Comal County, Texas,
78660-2185
Regulated Entity No.: RN101459246, TCEQ ID No:0460211,
Investigation No.: 1519055

Dear Mr. Williford:

On October 10, 2018, Mr. Aaron Rodriguez of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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, please feel free to contact Mr. Rodriguez in the San Antonio Region Office at (210) 403-4065.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/AR/eg

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

January 27, 2017

RECEIVED

FEB 6 2017

TXU - AP

Mr. Timothy Williford, Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
River Bend Estates, 160 Riverbend Rd., Bandera, Bandera County, Texas
Regulated Entity No.: RN101221257, TCEQ ID No.: 0100042, Investigation No.: 1375958

Dear Mr. Williford:

On November 16, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

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Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 23, 2019

RECEIVED

JUL 24 2019

TXU-AP

Mr. Tim Williford
Environmental Manager
SWWC Utilities Inc.
1620 Grand Avenue., Suite 140
Pflugerville, Texas 78660-2185

Re: Comprehensive Compliance Investigation at:
Rocky Creek Subdivision Water System, located on the southwest side of Medina Lake of
CR 266 and FM 2676, Medina County, Texas,
Regulated Entity No.: RN102676459, TCEQ ID No.:01630038, Investigation No.: 1557804

Dear Mr. Williford:

On May 23, 2019, Mr. Aaron Rodriguez of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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, please feel free to contact Mr. Rodriguez in the San Antonio Region Office at (210) 403-4065.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/AR/sg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 10, 2019

RECEIVED

APR 15 2019

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

Re: Compliance Evaluation Investigation at:
Southern Hills; Located 4 miles south of Kerrville off Hwy 16, Kerr County, Texas
Regulated Entity No.: RN101224384, TCEQ Additional ID: 1330128, Investigation No.:
1532011, Incident No.: 295825

Dear Mr. Williford,

On December 13, 2018, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. No violations are being alleged as a result of the investigation, however please see the Additional Issue.

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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/adj

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

SOUTHERN HILLS	Investigation # 1532011
, KERR COUNTY,	Investigation Date: 12/13/2018
Additional ID(s): 1330128	

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 606719

30 TAC Chapter 290.45(b)(1)(D)(iii)

Alleged Violation:

Investigation: 1336511

Comment Date: 06/10/2016

Failure to provide at least 2.0 GPM per service connection of service pump capacity.

At the time of the investigation, the water system relied on 290.45(b)(1)(D)(iii) and the presence of elevated storage to reduce the minimum required service pump capacity to be reduced from 2.0 GPM per connection to 0.6 GPM per connection. The elevated ground storage tank at the Monte Bello plant provide 6,800 gallons of elevated storage after the ground storage requirements for the 6 connections on the upper pressure plane were accounted for. According to 290.45(b)(1)(D)(iii), in order to qualify for reduced service pump capacity, the elevated storage must provide 200 gallons per connection. The elevated capacity of 6,800 was used to account for 34 of the 284 connections on the lower pressure plane. The resulting 250 connections required 2.0 GPM per connection and requiring at least 500 GPM of service pump capacity. After the 34 connections were accounted for in the service pump capacity (20.4 GPM), the water system produced 299.6 GPM and was at a deficit of 200.4 GPM, or 38.5% deficient on the lower pressure plane.

290.45(b)(1)(D)(iii) two or more pumps that have a total capacity of 2.0 gpm per connection or that have a total capacity of at least 1,000 gpm and the ability to meet peak hourly demands with the largest pump out of service, whichever is less, at each pump station or pressure plane. For systems which provide an elevated storage capacity of 200 gallons per connection, two service pumps with a minimum combined capacity of 0.6 gpm per connection are required at each pump station or pressure plane. If only wells and elevated storage are provided, service pumps are not required;

Investigation: 1421630

Comment Date: 08/23/2017

On June 29, 2017 the TCEQ received a request for a 365 day extension. The entity will be granted an additional 90 day extension to document that a compliance plan has been developed and submitted for UTRT approval.

Investigation: 1467363

Comment Date: 02/15/2018

This violation remains outstanding. However, Southwest Water Company is working with TCEQ Plan Review.

Investigation: 1532011

Comment Date: 02/26/2019

This violation is being resolved as a result of the compliance documentation received by the TCEQ San Antonio Region Office July 17, 2018 and December 7, 2018. A Supplemental Engineering Report and service pump upgrade at Madrona Water Plant were approved for construction by TCEQ Plan Review Team by letters dated May 23, 2018 and November 9, 2018.

Recommended Corrective Action: Provide by the compliance due date, completed work orders, invoices and/or photographs indicating that larger capacity service pumps have been installed, the elevated storage capacity has been increased in size to accommodate the active connections and/or that an Alternative Capacity Requirement has been granted.

The addition of a well or any other significant changes to the water system facilities requires

submittal and approval of engineering plans by the TCEQ Utilities Technical Review Team
(Phone No. 512-239-4691). All submittals shall be mailed to:

TCEQ
Utilities Technical Review Team, MC 159
PO BOX 13087
Austin, Texas 78711-3087

ACR requests must be submitted to the TCEQ Technical Review and Oversight Team (Phone No. 512-239-4691) for review and approval. All requests must be submitted to:

TCEQ
Technical Review and Oversight Team, MC 159
PO BOX 13087
Austin, Texas 78711-3087

Resolution: This violation is being resolved as a result of the compliance documentation received by the TCEQ San Antonio Region Office July 17, 2018 and December 7, 2018. A Supplemental Engineering Report and service pump upgrade at Madrona Water Plant were approved for construction by TCEQ Plan Review Team by letters dated May 23, 2018 and November 9, 2018.

ADDITIONAL ISSUES

Description

Item #2

Additional Comments

The entity was issued an approval letter dated 06/21/2010, to construct Well #4. However, approval for use of the well as a public water system was not obtained. The TCEQ is aware that the current system owner obtained the PWS in 2016, however please be advised that according to 30 TAC 290.41(c)(3)(A) the entity is required to obtain approval for the use of the well as a public water system source.

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



RECEIVED

FEB 9 2017

TXU - AF

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 6, 2017

CERTIFIED MAIL NO.: 91 7199 9991 7036 8836 8126
RETURN RECEIPT REQUESTED

Mr. Timothy Williford, Environmental Health and Safety Manager
Southwest Utilities, Inc
1620 Grand Avenue Pkwy., Ste. 140
Pflugerville, TX 78660-2185

Re: Notice of Violation for the Comprehensive Compliance Investigation at:
Stage Coach Hills, 25097 Broad Oak Tr., San Antonio, Bexar County, Texas
Regulated Entity No.: RN101186344, TCEQ ID No.: 0150096
Investigation No.: 1377749

Dear Mr. Williford:

On November 22, 2016, Ms. De'Shaune Blake of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for 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 based on subsequent corrective action. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violations. Therefore, no further action is required.

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 San Antonio Region Office at (210) 403-4096 or the Central Office Publications Ordering Team at 512-239-0028.

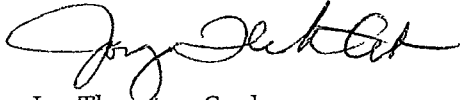
The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the 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 San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner, 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

Mr. Timothy Williford
Page 2
February 3, 2017

included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Blake in the San Antonio Region Office at (210) 403-4033.

Sincerely,



Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/db/eg

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

STAGE COACH HILLS	Investigation # 1377749
, BEXAR COUNTY,	Investigation Date: 11/22/2016
Additional ID(s): 0150096	

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

Track No: 630683

30 TAC Chapter 290.46(n)(1)

Alleged Violation:

Investigation: 1377749

Comment Date: 01/30/2017

Failure to provide as-built plans or record drawings and specifications for the public water supply.

At the time of the investigation, no as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities, for the water system were provided.

30 TAC 290.46(n)(1)-- Accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank shall be maintained at the public water system until the facility is decommissioned. As-built plans of individual projects may be used to fulfill this requirement if the plans are maintained in an organized manner.

Recommended Corrective Action: Provide by the compliance due date, copies of as-built plans or record drawings and specifications for the treatment, storage and pressure maintenance facilities for the water system.

Resolution: A copy of as-built drawings were provided.

AREA OF CONCERN

Track No: 630682

30 TAC Chapter 290.42(l)

Alleged Violation:

Investigation: 1377749

Comment Date: 01/30/2017

Failure to provide an updated plant operations manual.

At the time of the investigation, no information regarding the standpipe was provided in the plant operations manual.

30 TAC 290.42(l)-- Plant operations manual. A thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, 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: Provide by the compliance due date, a copy of an updated plant operations manual that indicates it has been compiled in accordance with requirements.

Resolution: A copy of an updated plant operations manual was provided.

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 21, 2018

RECEIVED

DEC 3 2018

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

Re: Compliance Evaluation Investigation at:
Verde Park Estates; Located 1 mile west of Center Point on FM 490, Kerr County, Texas
Regulated Entity No.: RN101210961, TCEQ Additional ID: 1330027, Investigation No.:
1523789

Dear Mr. Williford:

On October 18, 2018, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 20, 2018

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

RECEIVED
DEC 3 2018
TXU-AP

Re: Compliance Evaluation Investigation at:
Vista Hills; Located at 125 Vista Hills Drive, Kerr County, Texas
Regulated Entity No.: RN105915359, TCEQ Additional ID: 1330169, Investigation No.:
1523788

Dear Mr. Williford:

On October 18, 2018, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. No violations are being alleged as a result of the investigation, however please see the Additional Issue.

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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/eg

Summary of Investigation Findings

VISTA HILLS	Investigation # 1523788
, COUNTY,	Investigation Date: 10/18/2018
Additional ID(s): 1330169	

No Violations Associated to this Investigation

ADDITIONAL ISSUES

Description
Item #1

Additional Comments

Please be advised that the maintenance and housekeeping practices used by a public water system shall ensure the good working condition and general appearance of the system's facilities and equipment. The grounds and facilities shall be maintained in a manner so as to minimize the possibility of the harboring of rodents, insects, and other disease vectors, and in such a way as to prevent other conditions that might cause the contamination of the water.

At the time of the investigation, several cracks were noted on the masonry tank. The entity stated that the system's storage tanks were going to be replaced in the nearest future.

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

May 26, 2016

Mr. Gary Rose, Operations Manager
Southwest Water Company
1620 Grand Avenue Parkway, Ste., 140
Pflugerville, Texas 78660

Re: Comprehensive Compliance Investigation at:
Westwood Park Subdivision, .5 mile W of Comfort off Hwy 27, Kerr County,
Texas
Regulated Entity No.: RN101285476
TCEQ ID No.: 1330015, Investigation No.: 1323105

Dear Mr. Rose:

On March 24, 2016, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



W WOK

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 25, 2019

RECEIVED

APR 27 2019

TXU-AP

Mr. Tim Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue Pkwy Ste 140
Pflugerville, Texas 78660-2185

Re: Compliance Evaluation Investigation at: Westwood Park Subdivision;
Located 0.5 miles west of Comfort off Hwy 27, Kerr County, Texas
Regulated Entity No.: RN101285476, TCEQ Additional ID: 1330015, Investigation No.:
1553430

Dear Mr. Williford,

On March 26, 2019, Mrs. Agnieszka Hobson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Hobson in the San Antonio Region Office at (210) 403-4075.

Sincerely,

A handwritten signature in black ink, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/AMH/adj

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 23, 2019

**CERTIFIED MAIL 9171999991703923560353
RETURN RECEIPT REQUESTED**

Mr. Timothy Williford
Compliance Manager
SWWC Utilities, Inc.
1620 Grand Avenue, Pkwy., Ste. 140
Pflugerville, TX 78660-2185

Re: Notice of Violation for the Comprehensive Compliance Investigation at:
Windmill Ranch Subdivision, off of Hwy. 46 W. of Hwy. 281, Bulverde, Comal County,
Texas, Regulated Entity No.: RN101176931, TCEQ ID No.: 0460221
Investigation No.: 1578331

Dear Mr. Williford:

On June 18, 2019, Ms. De'Shaune Blake of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public water supply. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **December 23, 2019**, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

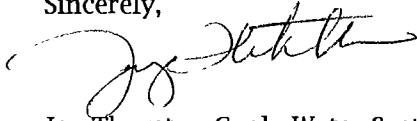
In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at (210) 403-4096 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 San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner, 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 enclosed Summary of Investigation Findings until an official decision is made regarding the status of the contested violation.

Mr. Timothy Williford
Page 2
August 23, 2019

If you or members of your staff have any questions, please feel free to contact Ms. De'Shaune Blake in the San Antonio Region Office at (210) 403-4033.

Sincerely,



Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/DB/sg

Enclosures: Summary of Investigation Findings

Summary of Investigation Findings

WINDMILL RANCH SUBDIVISION

Investigation #
1578331
Investigation Date: 06/18/2019

, COMAL COUNTY,

Additional ID(s): 0460221

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

Track No: 724494 Compliance Due Date: 12/23/2019

30 TAC Chapter 290.46(n)(1)

Alleged Violation:

Investigation: 1578331

Comment Date: 08/15/2019

Failure to maintain accurate and up-to-date as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank.

At the time of the investigation, it was documented that the water system was not maintaining accurate and up-to-date detailed as-built plans or record drawings at the public water system.

30 TAC 290.46(n)(1)-- Accurate and up-to-date detailed as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank shall be maintained at the public water system until the facility is decommissioned. As-built plans of individual projects may be used to fulfill this requirement if the plans are maintained in an organized manner.

Recommended Corrective Action: Provide by the compliance due date, as-built plans or record drawings and specifications for the treatment plants, pump stations, and storage tanks and written documentation indicating that they are being maintained at the public water system.

Track No: 724495 Compliance Due Date: 12/23/2019

30 TAC Chapter 290.41(c)(1)(F)

Alleged Violation:

Investigation: 1578331

Comment Date: 08/15/2019

Failure to provide for the wells, sanitary control easement, approved substitutes or exceptions to the requirement.

At the time of the investigation, a sanitary control easement was provided for well #1 (Windmill Ranch); however, the map indicates that there are five properties within a 150-foot radius of well #1, and only one signed sanitary control easement was provided. No sanitary control easements were provided for well #2 (Creekside Business Park) and well #3 (Kestrel Air Park Subdivision), approved substitute or exception to the requirement were provided for the well.

30 TAC 290.41(c)(1)(F)-- A sanitary control easement or sanitary control easements covering land within 150 feet of the well, or executive director approval for a substitute authorized by this subparagraph, shall be obtained.

Recommended Corrective Action: Provide by the compliance due date, copies of the sanitary control easements, approved substitutes or request an exception by writing to the TCEQ, Technical Review and Oversight Team (TROT) at MC 159, P.O. Box 13087, Austin, TX 78711-3087, and provide a copy of the granted exception to the TCEQ San Antonio Region Office.

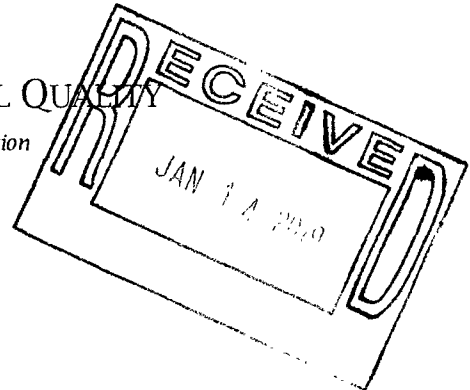
Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 8, 2019



Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Windwood Oaks Water System, 122 Windwood Road, Kerr County, Texas
Regulated Entity No.: RN102681996, TCEQ ID No.:1330141, Investigation No.: 1518538

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/sa/eg

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 25, 2019

RECEIVED

FEB -2 2019

TXU-AP

Mr. Timothy Williford
Compliance Manager
Southwest Water Company Utilities, Inc.
1620 Grand Avenue Parkway, Suite 140
Pflugerville, Texas 78660

Re: Compliance Evaluation Investigation at:
Woodhaven Mobile Home Park, 107 Chole Lane, Kerr County, Texas
Regulated Entity No.: RN 101266070, TCEQ ID No.: 1330024, Investigation No.: 1518537

Dear Mr. Williford:

On October 31, 2018, Mrs. Stacy Anderson of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for 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 Mrs. Anderson in the San Antonio Region Office at (210) 403-4078.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joy Thurston-Cook".

Joy Thurston-Cook
Water Section Team Leader
San Antonio Region Office

JTC/SA/eg