PATTERSON WATER SUPPLY, LLC
Profit & Loss by Class
January through December 2018

	Aero Valley	Briar Oaks/Cooley Point	Crazy Horse Ranchos Water	Vacation Village	Unclassified	TOTAL
Ordinary Income/Expense						
Income						
Briar/Cooley Sales	0 00	144 138 62	0 00	0 00	0 00	144 138 62
Crazy Horse Ranch Sales	0 00	0 00	44 590 82	0 00	0 00	44,590 82
Other Income	9 77	0 00	0 00	0 00	0 00	9 77
TWDB Principal Forgiveness	0 00	18,000 00	0 00	0 00	0 00	18,000 00
Vacation Village Sales	0 00	0 00	0 00	332,478 38	0 00	332,478 38
Water Connection Fees	0 00	750 00	750 00	4,800 00	0 00	6,300 00
Total Income	9 77	162,888 62	45,340 82	337,278 38	0 00	545,515 59
Expense						
Bad Debt	0 00	0 00	0 00	0 00	1,257 50	1,257 50
Bank Service Charges	0 00	327 79	0 00	327 95	0 00	655 74
Base Commerce	0 00	2 373 35	781 42	4,660 37	0 00	7,815 14
Chemicals	0 00	583 34	253 75	1 587 93	0 00	2,425 02
Computer and Internet Expenses	0 00	102 50	0 00	102 50	0 00	205.00
Continuing Education	0 00	172 50	0 00	172 50	0 00	345 00
Contract Labor	0 00	0 00	6 130 00	0 00	0 00	6 130 00
Deluxe Checks	0 00	149 09	32 50	149 08	0 00	330 67
Depreciation Expense	0 00	11,257 14	0 00	6 463 59	0 00	17,720 73
GCD Fees	0 00	2 097 41	898 28	2,522 36	0.00	5,318 03
Guaranteed Payments to Partners	0 00	11,250 00	0 00	11,250 00	0 00	22,500 00
Insurance Expense	0 00	1,676 15	0 00	3 112 85	0 00	4,789 00
Lab Fees	0 00	2,037 79	4,218 85	621 21	0 00	6,877 85
Legal & Accounting	0 00	523 00	169 00	692 00	0 00	1 384 00
Membership Dues	0 00	140 00	0 00	260 00	0 00	400 00
Miscellaneous Exp	0 00	0 00	0 00	683 54	-0 50	683 04
Office Supplies	0 00	250 95	83 83	501.90	0 00	836 48
Operation Expense	0 00	21,735 00	11,909 50	42,000 00	0 00	75,644 50
Postage & Delivery	0 00	1 171 14	308 62	1,898 24	0 00	3,378 00
Property Maintenance	0 00	0 00	0 00	2,205 00	0 00	2,205 00
Property Taxes Due	0 00	615 05	0 00	0 00	0 00	615 05
Repairs and Maintenance						
Labor	0 00	10,294 70	4,412 50	48,304 50	0 00	63,011 70
Parts	0 00	4,863 79	1,280 69	9,822 68	0 00	15,967 16
Total Repairs and Maintenance	0 00	15 158 49	5,693 19	58,127 18	0 00	78,978 86
Sewer Fees - City of Denton	0 00	0 00	0 00	126,994 09	0 00	126,994 09
Sewer Maintenance & Repairs	0 00	0 00	0 00	6,735 00	0 00	6,735 00
Software Updates	0 00	1 308 34	78 60	1,808 04	0 00	3,190 98
TCEQ-Regulatory Assess Fee	193 71	2,580 83	0 00	3,429 08	0 00	6,213 62
Telephone Expense	0 00	240 00	0 00	829 21	0 00	1,069 21
Travel Expense	0 00	0 00	1,853 00	0 00	0 00	1,853 00
Utilities	0 00	6,020 28	2,210 07	20,945 49	0 00	29,175 84
Well Repair & Maintenance	0 00	14 991 07	0 00	32 31	0 00	15,023 38
Total Expense	193 71	96 771 21	34,418 39	298,107 42	1,257 00	430,747 73
Net Ordinary Income	-183 94	66,115 41	10,922 43	39,170 96	-1,257 00	114,767 86
Net Income	**-183.94**	**66,115 41**	**10,922.43**	**39,170 96**	**-1,257 00**	**114,767 86**

PATTERSON WATER SUPPLY, LLC
Statement of Cash Flows
January through December 2018

	Jan - Dec 18
OPERATING ACTIVITIES	
Net Income	114,767.86
Adjustments to reconcile Net Income to net cash provided by operations:	
Accounts Receivable	1,257.50
A/R - Aero Valley	2,000.00
A/R - PPS	-30,000 00
A/R - PXC	-500.00
A/R TWDB	-120,780.00
Accounts Payable	13,000.00
Customer Deposits	2,802.10
PWS Aero Valley / PWS	-2,000.00
Net cash provided by Operating Activities	-19,452.54
INVESTING ACTIVITIES	
Accumulated Depreciation	17,720.73
Cooley Point System Improvement	-26,100.00
Equipment Improvements	-36,680.26
New Well - Vacation Village	-55,088 88
Net cash provided by Investing Activities	-100,148 41
FINANCING ACTIVITIES	
Note Payable - TWDB	120,780.00
Member 1 Draws	36,790.00
Member 1 Equity	78,346.50
Member 2 Draws	8,930.00
Member 2 Equity	26,120.16
Retained Earnings	-172,687 16
Net cash provided by Financing Activities	98,279.50
Net cash increase for period	-21,321.45
Cash at beginning of period	122,645.22
Cash at end of period	**101,323.77**

PATTERSON WATER SUPPLY, LLC
Balance Sheet
As of December 31, 2018

	Dec 31, 18
ASSETS	
Current Assets	
Checking/Savings	
Patterson Water Supply	46,557.15
PWS Crazy Horse Ranch Water	13,046.25
PWS Sewer Repair Fund	41,619 75
PWS Water Well Fund	100.62
Total Checking/Savings	101,323 77
Other Current Assets	
A/R - PPS	52,138.00
A/R - PXC	500.00
A/R TWDB	120,780.00
Total Other Current Assets	173,418.00
Total Current Assets	274,741.77
Fixed Assets	
Accumulated Depreciation	-51,780.25
Cooley Point System Improvement	26,100.00
Equipment Improvements	109,680.26
New Well - Briar/Cooley	24,000.00
New Well - Vacation Village	232,688.88
Total Fixed Assets	340,688.89
TOTAL ASSETS	**615,430.66**
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	13,000.00
Total Accounts Payable	13,000 00
Other Current Liabilities	
Customer Deposits	33,296.23
Total Other Current Liabilities	33,296.23
Total Current Liabilities	46,296.23
Long Term Liabilities	
Note Payable - TWDB	120,780.00
Total Long Term Liabilities	120,780.00
Total Liabilities	167,076.23
Equity	
Member 1 Draws	-14,375 00
Member 1 Equity	266,115.50
Member 2 Draws	-8,125.00
Member 2 Equity	88,713.57
Retained Earnings	1,257.50
Net Income	114,767.86
Total Equity	448,354.43
TOTAL LIABILITIES & EQUITY	**615,430.66**

PATTERSON WATER SUPPLY, LLC
Balance Sheet
As of December 31, 2019

	Dec 31, 19
ASSETS	
Current Assets	
Checking/Savings	
Patterson Water Supply	31,908.21
PWS Horseshoe Bend Water	7,568.74
PWS Perrin Water System	1,274.73
PWS Sewer Repair Fund	5,958.41
PWS Sunset Water	5,175.36
Total Checking/Savings	51,885.45
Other Current Assets	
A/R - PPS	25,940.24
A/R - PXC	500.00
A/R TWDB	120,780.00
Total Other Current Assets	147,220.24
Total Current Assets	199,105.69
Fixed Assets	
Accumulated Depreciation	-83,339.69
Buildings - Pump Houses	43,074.04
Cooley Point System Improvement	56,136.44
Crazy Horse System Improvements	17,926.17
Equipment Improvements	85,468.51
New Well - Briar/Cooley	142,767.75
New Well - Vacation Village	232,688.88
Trailers	6,001.20
Total Fixed Assets	500,723.30
TOTAL ASSETS	**699,828.99**
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	-12,536.33
Total Accounts Payable	-12,536.33
Other Current Liabilities	
Customer Deposits	38,356.23
Total Other Current Liabilities	38,356.23
Total Current Liabilities	25,819.90
Long Term Liabilities	
Note Payable - Mark Patterson	30,000.00
Note Payable - TWDB	120,780.00
Total Long Term Liabilities	150,780.00
Total Liabilities	176,599.90
Equity	
Member 1 Draws	-13,125.00
Member 1 Equity	338,825.00
Member 2 Draws	-8,625.00
Member 2 Equity	109,616.74
Member 3 Draws	-4,500.00
Retained Earnings	-87.31
Net Income	101,124.66
Total Equity	523,229.09
TOTAL LIABILITIES & EQUITY	**699,828.99**

PATTERSON WATER SUPPLY, LLC
Profit & Loss
January through December 2019

		Jan - Dec 19
Ordinary Income/Expense		
Income		
Briar/Cooley Sales		146,484.70
Community RP Sales		38,210.58
Crazy Horse Ranch Sales		42,508.99
Danieldale Sales		107,687.77
Horseshoe Bend System Sales		110,322.31
Other Income		8 58
Perrin Water Sales		42,046.19
Pilot Point Sales		2,250.30
Sewer Connection Fees		2,000.00
Sunset Water System Sales		57,524.10
Vacation Village Sales		333,556 47
Water Connection Fees		16,700.00
Total Income		899,299.99
Expense		
Bank Service Charges		1,093.98
Base Commerce		14,809 67
Chemicals		6,560.48
Continuing Education		395.00
Contract Labor		4,100.00
Deluxe Checks		1,001.45
Depreciation Expense		31,559.44
Equipment		20,734.56
Equipment Lease		3,000.00
GCD Fees		5,724 29
Insurance Expense		250.00
Interest Expense		450 00
Lab Fees		10,748.20
Legal & Accounting		8,316.10
Manager / Receiver Fees		15,826.80
Membership Dues		1,539.20
Miscellaneous Exp		-0.01
Office Supplies		1,234 84
Operation Expense		118,490.00
Postage & Delivery		7,128 94
PPS - Customer Misc Payclix		0.00
Property Maintenance		170 00
Property Taxes Due		582 68
Repairs and Maintenance		
Equipment	1,200.00	
Labor	165,651.25	
Parts	43,738.00	
Repairs and Maintenance - Other	603.00	
Total Repairs and Maintenance		211,192.25
Sewer Fees - City of Denton		155,351.50
Sewer Maintenance & Repairs		15,295.39
Software Updates		8,598.48
TCEQ-Regulatory Assess Fee		6,453.18
Telephone Expense		1,767 82
Travel Expense		12,776.51
Utilities		126,446.53
Well Repair & Maintenance		6,578.05
Total Expense		798,175.33
Net Ordinary Income		101,124.66
Net Income		**101,124.66**

PATTERSON WATER SUPPLY, LLC
Profit & Loss by Class
January through December 2019

	Aero Valley	Briar Oaks/Cooley Point	Community RP Water System	Crazy Horse Ranchos Water	Danieldale Water System	Horseshoe Bend
Ordinary Income/Expense						
Income						
Briar/Cooley Sales	0 00	146,005 31	0 00	0 00	0 00	0 00
Community RP Sales	0 00	0 00	37,867 36	0 00	0 00	0 00
Crazy Horse Ranch Sales	0 00	0 00	0 00	42,365 42	0 00	0 00
Danieldale Sales	0 00	0 00	0 00	0 00	107,048 41	0 00
Horseshoe Bend System Sales	0 00	0 00	0 00	0 00	0 00	105,399 45
Other Income	8 58	0 00	0 00	0 00	0 00	0 00
Perrin Water Sales	0.00	0 00	0.00	0 00	0 00	0 00
Pilot Point Sales	0 00	0 00	0 00	0.00	0 00	0 00
Sewer Connection Fees	0 00	0 00	0 00	0 00	0.00	0 00
Sunset Water System Sales	0 00	0 00	0 00	0 00	0 00	0 00
Vacation Village Sales	0 00	0 00	0 00	0 00	0 00	0 00
Water Connection Fees	0 00	3,000 00	1,000 00	2,300 00	0 00	0.00
Total Income	8 58	149,005 31	38,867.36	44,665 42	107,048 41	105,399 45
Expense						
Bank Service Charges	0 00	255 76	100 10	77 55	100 12	108 50
Base Commerce	0 00	2,755 04	964 13	936 80	1,814 80	1,702 95
Chemicals	0 00	771 47	1,098 40	627 00	0 00	507 61
Continuing Education	0.00	395 00	0 00	0 00	0 00	0.00
Contract Labor	0 00	0 00	0 00	4,000 00	100 00	0.00
Deluxe Checks	0.00	166 03	65 90	39 55	65 91	190 65
Depreciation Expense	0 00	12,876 29	0 00	772 39	0 00	0 00
Equipment	0.00	0 00	0 00	0 00	0 00	0 00
Equipment Lease	0 00	0 00	0 00	0 00	0 00	0.00
GCD Fees	0 00	2,340 89	0 00	756 86	0 00	0.00
Insurance Expense	0 00	0.00	0 00	0 00	0 00	0 00
Interest Expense	0 00	450 00	0 00	0 00	0 00	0 00
Lab Fees	-339 30	1,757 73	516.62	2,463 15	479 55	105 00
Legal & Accounting	0 00	602.70	437 20	2,822 70	437 20	156.00
Manager / Receiver Fees	0 00	0 00	0 00	0.00	0.00	13,134 00
Membership Dues	0.00	529 00	0.00	81 00	0 00	0 00
Miscellaneous Exp	0 00	0 00	0.00	0 00	0 00	0 00
Office Supplies	0 00	208 02	58 09	68 41	108 89	241.52
Operation Expense	0 00	24,075 00	12,000 00	13,815 00	12,000 00	0 00
Postage & Delivery	0.00	1,185 39	598 83	467 49	1,058 18	889 13
PPS - Customer Misc Payclix	0 00	0 00	0 00	0 00	0 00	0 00
Property Maintenance	0 00	0 00	0 00	0.00	0 00	170 00
Property Taxes Due	0 00	582 68	0 00	0 00	0 00	0 00
Repairs and Maintenance						
Equipment	0 00	1,200.00	0 00	0 00	0 00	0 00
Labor	0 00	17,943.75	10,273 75	6,915 00	5,448 75	40,475 00
Parts	0 00	6,242 41	1,634 20	2,192 08	2,086 23	9,820.93
Repairs and Maintenance - Other	0 00	603 00	0 00	0 00	0.00	0.00
Total Repairs and Maintenance	0 00	25,989.16	11,907 95	9,107 08	7,534 98	50,295 93
Sewer Fees - City of Denton	0 00	0 00	0 00	0 00	0 00	0 00
Sewer Maintenance & Repairs	0 00	0 00	0 00	0 00	0 00	0 00
Software Updates	0 00	2,817 44	483 48	547 82	623 35	1,301 27
TCEQ-Regulatory Assess Fee	0 00	1,843.75	0 00	834 74	0 00	0 00
Telephone Expense	0 00	328.65	0 00	0 00	0 00	0 00
Travel Expense	0 00	0.00	0 00	2,060 00	0 00	7,733 72
Utilities	0.00	5,394 14	5,606 99	2,842 28	76,753 34	4,143 98
Well Repair & Maintenance	0 00	2,442 00	0.00	4,136 05	0 00	0.00
Total Expense	-339 30	87,766 14	33,837 69	46,455 87	101,076 32	80,680 26
Net Ordinary Income	347 88	61,239 17	5,029 67	-1,790 45	5,972 09	24,719 19
Net Income	**347.88**	**61,239.17**	**5,029 67**	**-1,790.45**	**5,972.09**	**24,719.19**

PATTERSON WATER SUPPLY, LLC
Profit & Loss by Class
January through December 2019

	Perrin Water System	Pilot Point RWS	Sunset Water System	Vacation Village	Unclassified	TOTAL
Ordinary Income/Expense						
Income						
Briar/Cooley Sales	0 00	0 00	0 00	0 00	479 39	146,484.70
Community RP Sales	0 00	0 00	0 00	0.00	343 22	38,210 58
Crazy Horse Ranch Sales	0 00	0.00	0.00	0 00	143 57	42,508 99
Danieldale Sales	0 00	0 00	0 00	0.00	639.36	107,687.77
Horseshoe Bend System Sales	0 00	0 00	0 00	0 00	4,922 86	110,322 31
Other Income	0 00	0 00	0 00	0 00	0 00	8 58
Perrin Water Sales	41,683 67	0 00	0 00	0 00	362 52	42,046 19
Pilot Point Sales	0 00	2,190.89	0 00	0 00	59 41	2,250 30
Sewer Connection Fees	0 00	0 00	0 00	2,000.00	0 00	2,000 00
Sunset Water System Sales	0.00	0 00	55,730 49	0 00	1,793 61	57,524 10
Vacation Village Sales	0 00	0 00	0 00	332,251 83	1,304 64	333,556 47
Water Connection Fees	1,000 00	0 00	3,000 00	6,400 00	0 00	16,700 00
Total Income	42,683 67	2,190 89	58,730 49	340,651 83	10,048.58	899,299.99
Expense						
Bank Service Charges	0.00	0 00	0 00	255 78	196 17	1,093 98
Base Commerce	626.24	0 00	654 08	5,202 14	153 49	14,809.67
Chemicals	691 70	0 00	1,076.45	1,787.85	0 00	6,560 48
Continuing Education	0 00	0 00	0.00	0 00	0 00	395 00
Contract Labor	0 00	0 00	0 00	0 00	0 00	4,100 00
Deluxe Checks	153 69	0 00	153 69	166.03	0 00	1,001 45
Depreciation Expense	0.00	0 00	0 00	17,553 56	357 20	31,559 44
Equipment	0 00	0 00	11,306 52	0 00	9,428 04	20,734 56
Equipment Lease	0 00	0 00	0.00	0 00	3,000 00	3,000.00
GCD Fees	0 00	0 00	0.00	2,626 54	0 00	5,724 29
Insurance Expense	250 00	0 00	0.00	0 00	0 00	250 00
Interest Expense	0.00	0 00	0 00	0.00	0 00	450 00
Lab Fees	1,800.08	922 21	1,241 33	1,801.83	0 00	10,748 20
Legal & Accounting	976.80	0 00	2,306 80	576.70	0 00	8,316 10
Manager / Receiver Fees	1,440 00	0 00	1,252.80	0 00	0 00	15,826.80
Membership Dues	0 00	0 00	0 00	929.20	0 00	1,539 20
Miscellaneous Exp	-0 01	0 00	0 00	0 00	0 00	-0 01
Office Supplies	59.88	8 60	79 53	401 90	0 00	1,234 84
Operation Expense	0 00	0 00	0 00	45,500 00	11 100 00	118,490.00
Postage & Delivery	414 02	62 70	508 03	1,945 17	0 00	7,128.94
PPS - Customer Misc Payclix	0.00	0 00	0 00	0.00	0 00	0 00
Property Maintenance	0.00	0 00	0 00	0 00	0 00	170 00
Property Taxes Due	0 00	0 00	0 00	0 00	0 00	582 68
Repairs and Maintenance						
Equipment	0 00	0 00	0 00	0.00	0 00	1,200 00
Labor	22,101 25	2,605 00	27,932 50	31,956 25	0 00	165,651 25
Parts	3,866 96	811 77	9,964 74	4,159 42	2,959.26	43,738 00
Repairs and Maintenance - Other	0 00	0 00	0 00	0 00	0 00	603 00
Total Repairs and Maintenance	25,968 21	3,416 77	37,897 24	36,115 67	2,959.26	211,192.25
Sewer Fees - City of Denton	0 00	0 00	0 00	155,351.50	0 00	155,351 50
Sewer Maintenance & Repairs	0 00	0 00	0 00	15,295.39	0.00	15,295 39
Software Updates	172 38	19.69	347 89	2,285 16	0.00	8,598 48
TCEQ-Regulatory Assess Fee	0 00	0 00	0 00	3,774.69	0 00	6,453 18
Telephone Expense	243 84	0 00	0 00	1,125 96	69 37	1,767 82
Travel Expense	1,980 55	0 00	1,002 24	0 00	0 00	12,776 51
Utilities	3,407.95	733 06	3,679.94	23,884.85	0 00	126,446 53
Well Repair & Maintenance	0 00	0 00	0 00	0 00	0.00	6,578 05
Total Expense	38,185.33	5,163 03	61,506 54	316,579.92	27,263 53	798,175 33
Net Ordinary Income	4,498 34	-2,972.14	-2,776 05	24,071 91	-17,214.95	101,124.66
Net Income	**4,498.34**	**-2,972.14**	**-2,776.05**	**24, 071.91**	**-17,214. 95**	**101,124. 66**

PATTERSON WATER SUPPLY, LLC
Statement of Cash Flows
January through December 2019

	Jan - Dec 19
OPERATING ACTIVITIES	
Net Income	101,124.66
Adjustments to reconcile Net Income to net cash provided by operations:	
A/R - PPS	26,197.76
Accounts Payable	-25,536.33
Customer Deposits	5,060 00
Net cash provided by Operating Activities	106,846.09
INVESTING ACTIVITIES	
Accumulated Depreciation	31,559.44
Buildings - Pump Houses	-43,074.04
Cooley Point System Improvement	-30,036.44
Crazy Horse System Improvements	-17,926.17
Equipment Improvements	24,211.75
New Well - Briar/Cooley	-118,767.75
Trailers	-6,001.20
Net cash provided by Investing Activities	-160,034.41
FINANCING ACTIVITIES	
Note Payable - Mark Patterson	30,000.00
Member 1 Draws	1,250.00
Member 1 Equity	72,709.50
Member 2 Draws	-500.00
Member 2 Equity	20,903.17
Member 3 Draws	-4,500.00
Retained Earnings	-116,112.67
Net cash provided by Financing Activities	3,750 00
Net cash increase for period	-49,438.32
Cash at beginning of period	101,323 77
Cash at end of period	**51,885.45**

PATTERSON WATER SUPPLY, LLC
Balance Sheet
As of December 31, 2019

	Dec 31, 19
ASSETS	
Current Assets	
Checking/Savings	
Patterson Water Supply	31,908.21
PWS Horseshoe Bend Water	7,568.74
PWS Perrin Water System	1,274.73
PWS Sewer Repair Fund	5,958.41
PWS Sunset Water	5,175.36
Total Checking/Savings	51,885.45
Other Current Assets	
A/R - PPS	25,940.24
A/R - PXC	500 00
A/R TWDB	120,780.00
Total Other Current Assets	147,220.24
Total Current Assets	199,105.69
Fixed Assets	
Accumulated Depreciation	-83,339.69
Buildings - Pump Houses	43,074 04
Cooley Point System Improvement	56,136.44
Crazy Horse System Improvements	17,926.17
Equipment Improvements	85,468.51
New Well - Briar/Cooley	142,767.75
New Well - Vacation Village	232,688 88
Trailers	6,001.20
Total Fixed Assets	500,723.30
TOTAL ASSETS	**699,828.99**
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	-12,536.33
Total Accounts Payable	-12,536.33
Other Current Liabilities	
Customer Deposits	38,356.23
Total Other Current Liabilities	38,356.23
Total Current Liabilities	25,819.90
Long Term Liabilities	
Note Payable - Mark Patterson	30,000 00
Note Payable - TWDB	120,780.00
Total Long Term Liabilities	150,780.00
Total Liabilities	176,599 90
Equity	
Member 1 Draws	-13,125 00
Member 1 Equity	338,825.00
Member 2 Draws	-8,625.00
Member 2 Equity	109,616.74
Member 3 Draws	-4,500 00
Retained Earnings	-87.31
Net Income	101,124 66
Total Equity	523,229.09
TOTAL LIABILITIES & EQUITY	**699,828.99**

PATTERSON WATER SUPPLY, LLC
Balance Sheet
As of June 5, 2020

	Jun 5, 20
ASSETS	
Current Assets	
Checking/Savings	
Patterson Water Supply	23,153.93
PWS Horseshoe Bend Water	5,965.05
PWS Perrin Water System	3,548.61
PWS Sewer Repair Fund	1,177.16
PWS Sunset Water	6,364.71
Total Checking/Savings	40,209.46
Other Current Assets	
A/R - PPS	25,940.24
A/R - PXC	500.00
A/R TWDB	120,780.00
Total Other Current Assets	147,220.24
Total Current Assets	187,429.70
Fixed Assets	
Accumulated Depreciation	-83,339 69
Buildings - Pump Houses	43,074.04
Cooley Point System Improvement	56,136.44
Crazy Horse System Improvements	17,926.17
Equipment Improvements	85,468.51
New Well - Briar/Cooley	201,577.75
New Well - Vacation Village	232,688.88
Trailers	6,001.20
Total Fixed Assets	559,533.30
TOTAL ASSETS	**746,963.00**
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	47,343 34
Total Accounts Payable	47,343.34
Other Current Liabilities	
Customer Deposits	40,319.85
Total Other Current Liabilities	40,319.85
Total Current Liabilities	87,663 19
Long Term Liabilities	
Note Payable - TWDB	120,780.00
Total Long Term Liabilities	120,780.00
Total Liabilities	208,443.19
Equity	
Member 1 Draws	-18,310.25
Member 1 Equity	338,825.00
Member 2 Draws	-16,030.13
Member 2 Equity	109,616.74
Member 3 Draws	-11,342.63
Retained Earnings	101,037.35
Net Income	34,723.73
Total Equity	538,519.81
TOTAL LIABILITIES & EQUITY	**746,963.00**

PATTERSON WATER SUPPLY, LLC
Profit & Loss
June 1 - 5, 2020

	Jun 1 - 5, 20
Ordinary Income/Expense	
Income	
Briar/Cooley Sales	3,075.08
Community RP Sales	362.31
Crazy Horse Ranch Sales	947.50
Danieldale Sales	425.18
Horseshoe Bend System Sales	2,955.92
Perrin Water Sales	481.67
Pilot Point Sales	209.62
Sunset Water System Sales	927.24
Vacation Village Sales	4,958.17
Total Income	14,342.69
Expense	
Base Commerce	1,897.43
Chemicals	44.00
Dally Check MP	5,530.90
Lab Fees	168.00
Operation Expense	9,615.00
Postage & Delivery	690.40
Purchase Water	7,615.26
Repairs and Maintenance	29,992.95
Sewer Maintenance & Repairs	202.50
Utilities	1,379.12
Total Expense	57,135.56
Net Ordinary Income	-42,792.87
Net Income	**-42,792.87**

PATTERSON WATER SUPPLY, LLC
Profit & Loss by Class
January through December 2020

	Briar Oaks/Cooley Point	Community RP Water System	Crazy Horse Ranchos Water	Danieldale Water System	Horseshoe Bend	Perrin Water System
Ordinary Income/Expense						
Income						
Briar/Cooley Sales	70,736 49	0 00	581 57	0 00	0 00	0 00
Community RP Sales	0 00	20,628 17	0 00	0 00	0.00	0 00
Crazy Horse Ranch Sales	0 00	0 00	15,791 43	0 00	0 00	0 00
Danieldale Sales	0 00	0 00	0 00	61,147 13	0 00	0 00
Horseshoe Bend System Sales	0.00	0 00	0 00	0 00	130,652 54	0.00
Other Income	0 00	0 00	0.00	0 00	0 00	0 00
Perrin Water Sales	0 00	0 00	0 00	0 00	0.00	31,836 63
Pilot Point Sales	0 00	0 00	0 00	0.00	0 00	0 00
Sunset Water System Sales	0 00	0 00	0 00	0 00	0 00	0 00
Vacation Village Sales	0 00	0 00	0 00	0 00	0 00	0 00
Water Connection Fees	1,500 00	0 00	2,300 00	0 00	0 00	0 00
Total Income	72,236 49	20,628.17	18,673 00	61,147 13	130,652 54	31,836 63
Expense						
Bank Service Charges	93 27	55 23	30 96	102 19	78 00	0 00
Base Commerce	1,426 51	888 09	524 45	1,584 13	3 327 63	806 77
Chemicals	4 00	270 75	114.00	0 00	0 00	498.75
Daily Check MP	0.00	0 00	0.00	-589 10	5,580 00	540 00
Deluxe Checks	0 00	0 00	0 00	0 00	22 28	74 70
Deposit Refund	0 00	0 00	0 00	50.00	0 00	0 00
Equipment	0 00	0 00	0 00	0 00	0 00	0 00
Equipment Lease	0 00	0 00	0 00	0 00	0 00	0 00
GCD Fees	0 00	619.03	1,724 02	0 00	4,721 73	0 00
Insurance Expense	0 00	0 00	0 00	0 00	0 00	0 00
Interest Expense	250 00	0 00	0 00	0 00	0.00	0 00
Lab Fees	0 00	0 00	443 46	106 97	63 00	342 35
Legal & Accounting	0 00	0 00	0 00	0 00	0 00	897 00
Manager / Receiver Fees	0.00	0 00	0 00	0 00	14,210 10	6,799 20
Miscellaneous Exp	0 00	0.00	0 00	0 00	0 00	0 00
Office Supplies	0 00	0.00	0 00	0 00	0 00	0.00
Operation Expense	10,592 13	7,711 93	7,476 68	17,506 28	96,071 49	17,323 18
Postage & Delivery	85 05	43 05	22 75	79 45	174 65	38 85
PPS - Customer Misc Payclix	675 00	0.00	0 00	0 00	0 00	0 00
Property Maintenance	0 00	0 00	0 00	0 00	720 00	0 00
Purchase Water	0 00	0 00	0 00	7,615 26	0 00	0 00
Repairs and Maintenance						
Equipment	0 00	10,739 70	0 00	0 00	0 00	0 00
Repairs and Maintenance - Other	1,035.00	450 00	1,599 76	0 00	10,657 78	3,733 81
Total Repairs and Maintenance	1,035 00	11,189 70	1,599.76	0 00	10,657 78	3,733 81
Sewer Fees - City of Denton	0.00	0 00	0 00	0 00	0 00	0 00
Sewer Maintenance & Repairs	0 00	0 00	0 00	0 00	0 00	0 00
TCEQ-Regulatory Assess Fee	0.00	0 00	0.00	0 00	0 00	1,053 17
Telephone Expense	0 00	0 00	0 00	0 00	0 00	0 00
Utilities	924 84	3,573 96	153.70	6,378 21	779 21	2,069 48
Well Registration	0 00	100 00	0 00	0 00	0 00	0 00
Total Expense	15,085 80	24,451 74	12,089 78	32,833 39	136,405 87	34,177 26
Net Ordinary Income	57,150 69	-3,823 57	6,583 22	28,313 74	-5,753 33	-2,340 63
Other Income/Expense						
Other Expense						
Ask My Accountant	0 00	0 00	0 00	0 00	0 00	0 00
Total Other Expense	0 00	0 00	0 00	0 00	0 00	0 00
Net Other Income	0.00	0 00	0 00	0 00	0 00	0 00
Net Income	**57,150 69**	**-3,823.57**	**6,583.22**	**28,313.74**	**-5,753.33**	**-2,340.63**

PATTERSON WATER SUPPLY, LLC
Profit & Loss by Class
January through December 2020

	Pilot Point RWS	Sunset Water System	Vacation Village	Unclassified	TOTAL
Ordinary Income/Expense					
Income					
Briar/Cooley Sales	0 00	0 00	0 00	983 32	72,301 38
Community RP Sales	0 00	0 00	0 00	26 71	20,654 88
Crazy Horse Ranch Sales	0 00	0 00	0 00	0 00	15,791 43
Danieldale Sales	0 00	0 00	0 00	273 29	61,420 42
Horseshoe Bend System Sales	0 00	0 00	0 00	2,347 98	133,000 52
Other Income	0 00	0 00	0 00	5,899 26	5,899 26
Perrin Water Sales	0 00	0 00	0 00	962 15	32,798 78
Pilot Point Sales	3,101 42	0 00	0 00	0 00	3,101 42
Sunset Water System Sales	0 00	45,561 99	0 00	0 00	45 561 99
Vacation Village Sales	0 00	0 00	145,477 11	1,067 59	146,544 70
Water Connection Fees	0 00	0 00	8,000 00	0 00	11,800 00
Total Income	3,101.42	45 561 99	153,477 11	11,560.30	548,874 78
Expense					
Bank Service Charges	0.00	0 00	175 33	0 00	534 98
Base Commerce	25 12	1,021 79	2,767.52	43 62	12,415.63
Chemicals	40 00	299 25	1,660.63	80 00	2,967.38
Daily Check MP	0 00	0 00	0 00	0 00	5,530 90
Deluxe Checks	0 00	69 21	0 00	185 61	351 80
Deposit Refund	0 00	0 00	0 00	0 00	50 00
Equipment	0 00	527 77	0 00	1,049 53	1,577 30
Equipment Lease	0 00	0.00	0 00	3,750 00	3,750 00
GCD Fees	99 63	1,315 86	1,458 70	0 00	9,938 97
Insurance Expense	0 00	0 00	0 00	9,259 99	9,259 99
Interest Expense	0 00	0 00	0 00	0.00	250 00
Lab Fees	21 00	300 35	0 00	1,445 18	2,722 31
Legal & Accounting	0 00	871 00	0 00	0 00	1,768 00
Manager / Receiver Fees	0 00	11,152 00	0 00	2,944 00	35,105.30
Miscellaneous Exp	0.00	0 00	0 00	5,468 00	5,468 00
Office Supplies	0 00	0 00	0 00	352 06	352 06
Operation Expense	1,978 33	28,002.76	17,348.67	46,687 17	250,698 62
Postage & Delivery	16 50	99 90	130 20	0 00	690.40
PPS - Customer Misc Payclix	0 00	0 00	0.00	-3,550 00	-2,875 00
Property Maintenance	0 00	0 00	0 00	0 00	720 00
Purchase Water	0 00	0 00	0.00	0 00	7,615 26
Repairs and Maintenance					
Equipment	0 00	0 00	0 00	0 00	10,739 70
Repairs and Maintenance - Other	630 00	7,741 89	4,144 71	0 00	29,992 95
Total Repairs and Maintenance	630 00	7,741 89	4,144 71	0 00	40,732 65
Sewer Fees - City of Denton	0.00	0 00	70,964.50	0 00	70,964 50
Sewer Maintenance & Repairs	0 00	0 00	202.50	0 00	202 50
TCEQ-Regulatory Assess Fee	0.00	0 00	0 00	5,224 95	6,278.12
Telephone Expense	0 00	0 00	106 95	281 32	388.27
Utilities	1,305.86	847 64	9,985 50	474 71	26,493 11
Well Registration	100 00	0 00	0.00	0 00	200 00
Total Expense	4,216 44	52,249 42	108,945 21	73,696 14	494,151 05
Net Ordinary Income	-1,115 02	-6,687 43	44,531 90	-62,135 84	54,723 73
Other Income/Expense					
Other Expense					
Ask My Accountant	0 00	20,000 00	0 00	0 00	20,000 00
Total Other Expense	0 00	20,000 00	0 00	0 00	20,000.00
Net Other Income	0 00	-20,000 00	0 00	0 00	-20,000 00
Net Income	**-1,115.02**	**-26,687.43**	**44,531.90**	**-62,135.84**	**34,723 73**

PATTERSON WATER SUPPLY, LLC
Statement of Cash Flows
January 1 through June 5, 2020

	Jan 1 - Jun 5, 20
OPERATING ACTIVITIES	
Net Income	34,723.73
Adjustments to reconcile Net Income to net cash provided by operations:	
Accounts Payable	59,879 67
Customer Deposits	1,963.62
Net cash provided by Operating Activities	96,567.02
INVESTING ACTIVITIES	
New Well - Briar/Cooley	-58,810.00
Net cash provided by Investing Activities	-58,810.00
FINANCING ACTIVITIES	
Note Payable - Mark Patterson	-30,000.00
Member 1 Draws	-5,185.25
Member 2 Draws	-7,405.13
Member 3 Draws	-6,842.63
Net cash provided by Financing Activities	-49,433.01
Net cash increase for period	-11,675 99
Cash at beginning of period	51,885.45
Cash at end of period	**40,209.46**

PATTERSON WATER SUPPLY, LLC
Balance Sheet
As of June 5, 2020

	Jun 5, 20
ASSETS	
Current Assets	
Checking/Savings	
Patterson Water Supply	23,153.93
PWS Horseshoe Bend Water	5,965.05
PWS Perrin Water System	3,548.61
PWS Sewer Repair Fund	1,177.16
PWS Sunset Water	6,364.71
Total Checking/Savings	40,209.46
Other Current Assets	
A/R - PPS	25,940.24
A/R - PXC	500.00
A/R TWDB	120,780.00
Total Other Current Assets	147,220.24
Total Current Assets	187,429.70
Fixed Assets	
Accumulated Depreciation	-83,339.69
Buildings - Pump Houses	43,074.04
Cooley Point System Improvement	56,136.44
Crazy Horse System Improvements	17,926.17
Equipment Improvements	85,468.51
New Well - Briar/Cooley	201,577.75
New Well - Vacation Village	232,688.88
Trailers	6,001.20
Total Fixed Assets	559,533.30
TOTAL ASSETS	**746,963.00**
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	47,343.34
Total Accounts Payable	47,343.34
Other Current Liabilities	
Customer Deposits	40,319.85
Total Other Current Liabilities	40,319.85
Total Current Liabilities	87,663.19
Long Term Liabilities	
Note Payable - TWDB	120,780.00
Total Long Term Liabilities	120,780.00
Total Liabilities	208,443.19
Equity	
Member 1 Draws	-18,310.25
Member 1 Equity	338,825.00
Member 2 Draws	-16,030.13
Member 2 Equity	109,616.74
Member 3 Draws	-11,342 63
Retained Earnings	101,037.35
Net Income	34,723.73
Total Equity	538,519.81
TOTAL LIABILITIES & EQUITY	**746,963.00**

PATTERSON WATER SUPPLY, LLC
Statement of Cash Flows
January 1 through June 5, 2020

	Jan 1 - Jun 5, 20
OPERATING ACTIVITIES	
Net Income	34,723.73
Adjustments to reconcile Net Income to net cash provided by operations:	
Accounts Payable	59,879.67
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New Well - Briar/Cooley	-58,810.00
Net cash provided by Investing Activities	-58,810.00
FINANCING ACTIVITIES	
Note Payable - Mark Patterson	-30,000 00
Member 1 Draws	-5,185.25
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Member 3 Draws	-6,842.63
Net cash provided by Financing Activities	-49,433.01
Net cash increase for period	-11,675 99
Cash at beginning of period	51,885.45
Cash at end of period	**40,209.46**

Perrin Water System
5 Year Projection of Income & Expense

	2019	2020	2021	2022	2023	2024
Ordinary Income/Expense						
Income						
Perrin Water Sales	41,683.67	42,000 00	42,000.00	42,000 00	42,000.00	42,000 00
Water Connection Fees	1,000 00					
Total Income	42,683.67	42,000.00	42,000.00	42,000.00	42,000 00	42,000 00
Expense						
Base Commerce	626.24	650 00	650.00	650.00	650 00	650 00
Chemicals	691.70	1,600.00	1,600.00	1,600 00	1,600.00	1,600 00
Deluxe Checks	153.69	150 00	150 00	150.00	150.00	150.00
Insurance Expense	250.00					
Lab Fees	1,800.08	27.00	27.00	27.00	27.00	27 00
Legal & Accounting	976.80					
Manager / Receiver Fee	1,440.00					
Office Supplies	59.88					
Postage & Delivery	414.02	500 00	500.00	500.00	500.00	500.00
Repairs and Maintenance						
Labor	22,101.25	18,000.00	18,000.00	18,000 00	18,000.00	18,000.00
Parts	3,866 96	6,000.00	6,000.00	6,000.00	6,000.00	6,000.00
Total Repairs and Maint	25,968.21	24,000.00	24,000.00	24,000.00	24,000 00	24,000.00
Software Updates	172.38					
Telephone Expense	243.84					
Travel Expense	1,980.55					
Utilities	3,407.95					
Total Expense	38,185.34	26,927 00	26,927.00	26,927 00	26,927.00	26,927.00
Net Ordinary Income	4,498.33	15,073.00	15,073.00	15,073 00	15,073.00	15,073.00
	4,498.33					

attachment 9

Issues at Sunset and Perrin WSC's

Perrin needed Repairs

Production			
	Only One Booster Pump	Additional Pump $2500 to $4000	$3,250.00
	No Chlorinator	Peristaltic Pump Installed $550.00	$750.00
	Plug Abandoned Well	$7,500.00	$7,500.00
	Pull Repair Well #2	$7,500.00	$7,500.00
	Chlorine lines to ground storage tanks leak	$25/parts /$50 labor	$75.00
	Plumbing in Pumphouse Sub Standard	$500 /Parts / $500 Labor	$1,000.00
	No well control systems	$500/ per well X3	$1,500.00
	Control panel for Booster Pump #2 burnt up	$750/ Parts / $250 Labor	$1,000.00
	Fences overgrown with Vines / Trees	$250 Labor	$250.00
	Needed Tank Maintenance	Unknown all need painted inside and out $15,000	$15,000.00
	Well Heads not up to standards	$1200/ per well X 3	$3,600.00
Office			
	No Customer Lists	20 office hours @ 20.00 / hour	$400.00
	No Plant Manuals	7 office hours @ $20.00 / hour	$140.00
	No Plant Schematics / As-built's	$5000 for engineer	$5,000.00
	No Well Logs	10 office hours @ 20.00 / hour	$200.00
	No Sanitary Control Easements	10 office hours @ 20.00 / hour	$200.00
	No Monitoring Plan	5 office hours @ 20.00 / hour	$100.00
	Unpaid Charges for Samples at State Labs	Unknown	$500.00
Distribution System			
	No System Maps	$500 to $5000	$2,500.00
	Unknown Connections	Unknown amounts of water loss	?
	Multiple Leaks	Estimate 20 at $300 each	$6,000.00
	Distribution Piping Replacement Plan	$12,000 per years for 10 years	$120,000.00
	Meters are very old need replaced	$150 / per meter installed or water loss until changed	$18,000.00
	Finding Meter Locations	40 outside worker hours @ 30 / per hour	$1,200.00
			$195,665.00

Perrin Monthly Expence

$1,630.54	Perrin Needed Repairs Amaritized for 10 years
$750.00	New Repairs / Maintenance
$700.00	Electricity 3 wells and Pumphouse
$1,200.00	Temporary Managers Fee
$800.00	Operators Pay
$500.00	Excavator Expense
$75.00	Lawn Maintenance
$40.00	Use Fee Cellular Auto dialer
$75.00	Chlorine
$500.00	Fuel
$750.00	Truck / Insurance
$90.00	Samples
$200.00	Billing, Postage, Bookeeping
$250.00	Physical / Liability Insurance

	Per Customer
$7,560.54 / by 120	**$63.00**

If we use IRS mileage it is 190 miles round trip.
X 8.6 Trips Per month = $947.72

attachment h

Cause No. D-1-GN-19-003297

STATE OF TEXAS,	§	**IN THE DISTRICT COURT**
	§	
Plaintiff,	§	
	§	
v.	§	**TRAVIS COUNTY, TEXAS**
	§	
PERRIN WATER SYSTEMS, INC. AND TEXAS RAIN HOLDING COMPANY, INC.,	§	
	§	
Defendants.	§	**250th JUDICIAL DISTRICT**

AGREED ORDER APPOINTING RECEIVER

On June 10, 2019, Plaintiff, the State of Texas ("State") filed its Original Petition and Application for the Appointment of a Receiver. On this day, the State and Defendants Perrin Water Systems, Inc. and Texas Rain Holding Company, Inc. submitted to the Court this Agreed Order Appointing Receiver ("Agreed Order"). Therefore, by the duly authorized signatures subscribed to this Agreed Order, all Parties represent to thee Court that they agree to its terms. After consideration of the State's Application for a Receiver, the pleadings, affidavits, and evidence, the Court makes the following findings and orders the following relief:

THE COURT FINDS:

1. The State of Texas filed suit against Perrin Water and Texas Rain on September 27, 2018. On March 11, 2019, the Court signed a default judgment and permanent injunction ("Final Default Judgment") against Perrin Water and Texas Rain. The Default Judgment resulted in: $1,150.00 in civil penalties against Perrin Water, $1,150.00 in civil penalties against Texas Rain, attorney's fees of $9,275.00, and injunctive relief ("Injunction").

2. On May 3, 2019, the Texas Commission on Environmental Quality ("TCEQ") issued an emergency order and appointed Mark Patterson as temporary manager of the public

water system, hereafter the "Water System and Utility," located at 215 S. Smith, Perrin, Jack County, Texas, and legally described as PRT LTS 7,8 BLK 26 PERRIN 58X73.

3. On June 10, 2019, the State filed this enforcement action for civil penalties, the appointment of a receiver, and attorney's fees for violations of the Texas Commission on Environmental Quality's rules and regulations adopted under Chapter 341 of the Texas Health & Safety Code. All violations arise from Defendants' ownership and operation of the Water System and Utility.

4. Perrin Water Systems, Inc. ("Perrin" or "Owner") owns the Water System and Texas Rain Holding Company, Inc. ("Texas Rain" or "Operator") operated the Water System and Utility from at least June 1, 2014 until May 3, 2019.

5. At all times relevant to the violations in this matter, Texas Rain was the operator of the Water System and Utility.

6. The Water System and Utility is a "utility," a "water utility," and a "retail public utility" as those terms are defined in Tex. Water Code § 13.002.

Defendants Perrin and Texas Rain have abandoned operation of the Water System and Utility

7. On at least twelve occasions, the Owner/Operator have failed to maintain the free chlorine residual above 0.2 mg/L, as required by 30 Tex. Admin. Code § 290.110(b). Therefore, the Court finds that the Owner/Operator have abandoned operation of the Water System and Utility by failing to provide appropriate water treatment, resulting in potential health hazards. Tex. Water Code § 13.412(f)(2).

8. On at least six occasions, the Owner/Operator have failed to provide minimum water pressure at the Water System and Utility, as required by 30 Tex. Admin. Code § 290.46(r);

and have failed to ensure all water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances are maintained in watertight condition and free if excessive solids at the Water System and Utility on at least eleven occasions, as required by 30 Tex. Admin. Code § 290.42(m)(4). Therefore, the Court finds that the Owner/Operator have abandoned operation of the Water System and Utility by failing to adequately maintain facilities, resulting in potential health hazards. Tex. Water Code § 13.412(f)(3).

9. The Owner/Operator have failed to comply with a final judgment issued by a district court in a suit brought by the attorney general under Chapter 7 of the Water Code or Chapter 341 of the Health and Safety Code. The State obtained a Final Default Judgment against Perrin and Texas Rain on March 11, 2019. TCEQ investigators have observed numerous instances of low water pressure, low chlorine residuals, and numerous leaks at the Water System and TCEQ has not received any compliance documentation from Perrin or Texas Rain displaying compliance with the Final Default Judgment. Therefore, the Court finds that the Owner/Operator have abandoned operation of the Water System and Utility by failing to adhere to a final judgment issued by a district court in a suit brought by the attorney general under Chapter 7 of the Water Code or Chapter 341 of the Health and Safety Code. Tex. Water Code § 13.412(a)(5).

A Receiver is necessary to guarantee continuous and adequate service to the Water System and Utility's customers

10. Because the Owner/Operator have abandoned operation of the Water System and Utility, the Court further finds that the appointment of a receiver is necessary to guarantee continuous and adequate service to the customers of the utility. Tex. Water Code § 13.412(b)(2).

THE COURT THEREFORE ORDERS:

11. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are hereby ENJOINED to turn over exclusive possession and control of all the following assets to the Receiver appointed herein:

a. The Water System and Utility, providing water service under PWS No. 119005 and CCN No. 12196, located at 215 S. Smith, Perrin, Jack County, Texas, and legally described as PRT LTS 7,8 BLK PERRIN 58X73; and

b. All real property, easements, pipes, fittings, housings, and other appurtenances and other property attached to or used in the said Water System and Utility; all monies generated by or through the said Water System and Utility, all current assets on hand, including cash, securities, cash equivalents, and all bank accounts used for the deposit of funds generated by or through that Water System and Utility and all current accounts receivable and all future accounts receivable generated by or through that Water System and Utility as they come due; and all water and other assets that in any way are produced by or used in connection with the said Water System and Utility, including all records of customer bills and payments, all records of accounts receivable or payable, all lists of customers, all maps showing the location of pipelines, valves, or meters, and all real estate records that in any way pertain to the Water System and Utility or the tracts on which they are located.

12. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED to deliver to the Receiver, immediately and in no event later than 7 days after the date the Court signs this Agreed Order, all property (including checks, cash, and cash equivalents) related in any way to the Water System and Utility, that the Owner/Operator or anyone else received on or after the date the Court signs this Agreed Order. Within 7 days of the date the Court signs this Agreed Order, the Owner/Operator shall deliver an accounting of the receipt and handling of that property to the Receiver and to Plaintiff's attorney.

13. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED to cooperate with the Receiver, so that the Receiver can ensure continued water service to all customers of the Water System and Utility.

14. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED not to interfere in any way with the Receiver's sole right of possession and control of any of the assets hereby ordered to be turned over to the Receiver and not to interfere with any efforts by the Receiver to determine the nature, location, and amount of those assets.

15. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED to provide the Receiver, upon the Receiver's request, all records the Owner/Operator may possess or control that may assist the Receiver in performing his duties under this Agreed Order

16. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED to forward to the Receiver, upon the Receiver's request, all correspondence relating to the Water System and Utility then in hand, and shall forward any additional correspondence as it is received.

17. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, shall, upon the Receiver's request, relinquish to the Receiver all documents and convey to the Receiver

property, including leases that the Owner/Operator may own related to the Water System and Utility.

18. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, shall, upon the Receiver's request, convey to the Receiver the real property described in Paragraph 11(a) of this Agreed Order.

19. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED not to transact any business of the Water System and Utility in any manner whatsoever, except through the specific authority of this Court or the Receiver, and not to commence or prosecute any action or appeal, including, but not limited to, arbitration or mediation, and not to obtain or attempt to obtain any preference, judgment, attachment, garnishment, or lien or make any levy against the said Water System and Utility, against the assets thereof, or against the Receiver, except by doing so in the receivership proceeding herein.

20. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED not to convey, dispose of, use, release, transfer, withdraw, allow to be withdrawn, or conceal in any manner any property or assets of the Owner/Operator related to the Water System and Utility, and not to dispose of any account, debt, deposit, equipment, or any other asset that the Owner/Operator may own, owe to, or hold for the benefit of the Water System and Utility or any of its customers, except that the Owner/Operator are specifically ORDERED to turn over such property and assets to the exclusive control of the Receiver appointed herein.

THE COURT FURTHER ORDERS:

21. Any and all banks, savings and loan associations, trust companies, and any other persons, corporations, associations, depositories, and other legal entities are ENJOINED not to convert, dispose of, use, release, transfer, withdraw, allow to be withdrawn, or conceal in any manner any property or assets of the Owner/Operator related to the Water System and Utility, and not to dispose of any account, debt, deposit, equipment, or any other asset that the Owner/Operator may own, owe to, or hold for the benefit of the said Water System and Utility or any of its customers, except that they are specifically ORDERED to turn over such property and assets to the exclusive control of the Receiver appointed herein.

THE COURT FURTHER ORDERS:

22. Mark Patterson, Temporary Manager of the Water System and Utility, is hereby appointed Receiver of all property described in this Agreed Order, and that upon taking the oath and filing the bond required by law, the Receiver shall be authorized, subject to the control of the Court, to do any and all acts necessary to the proper and lawful conduct of the receivership, not limited to the following:

a. Collect the assets (including, but not limited to, all real property, easements, wells, tanks, treatment facilities, pipes, fittings, chlorinators, housings, and other appurtenances and other property attached to or used in the said Water System and Utility; all monies generated by or through the said Water System and Utility, all current assets on hand, including cash, securities, cash equivalents, all bank accounts and all current accounts receivable and all future accounts receivable as they come due, and all water and other assets that in any way are produced by or through or used in connection with the said Water System and Utility, including all records of customer bills and payments, all records of accounts receivable or payable, all lists of customers, all maps showing the location of pipelines, valves, or meters, and all real estate records that in any way pertain to the Water System and Utility or the tracts on which it is located), and carry on the business of the Water System and Utility;

b. Provide continuous and adequate water utility service to the customers of said Water System and Utility, including, but not limited to, arranging for a wholesale water contract or interconnection with another water system;

c. If necessary, retain a certified operator(s) for the Water System and Utility and pay the operator(s) and pay all other reasonably necessary operating expenses out of income from the Water System and Utility at a reasonable rate as wages or bills come due; and bill and collect monies for water services;

d. Retain accountants, attorneys, engineers, consultants, or others, as necessary, and pay them out of income from the Water System and Utility as their bills come due; and have performed any necessary evaluation, maintenance, improvement, or repair on the said Water System and Utility;

1. The receiver may not contract for, or incur attorney's fees in excess of $15,000.00 in the aggregate for the duration of this receivership, unless otherwise approved by the Court;

2. The Receiver may not contract for, or incur engineering fees in excess of $35,000.00 in the aggregate for the duration of this receivership, unless otherwise approved by the Court;

3. The Receiver may not contract for, or incur consulting fees or contractor fees in excess of $25,000.00 in the aggregate for the duration of this receivership, unless otherwise approved by the Court.

e. Accept and receive funds for the continuation of water utility service, open and close bank accounts, and take measures necessary to designate or change signatories on any such accounts;

f. Receive all payments due and owing for water service provided to the customers of the said Water System and Utility;

g. File and pursue applications for all necessary permits, licenses, rate orders, tariffs, and certificates as required by law, including, but not limited to, CCNs, transfers of the CCNs, and decertification of the CCNs under Chapter 13 of the Texas Water Code;

h. Incur risks, debts, liabilities, and obligations ordinarily incurred by owners, managers, and operators of similar business enterprises;

i. In cooperation with representatives of TCEQ, prepare a schedule of repairs and improvements to bring the Water System and Utility into compliance with applicable statutes and regulations in the shortest possible time with the funds available;

j. Provide quality control, operating procedure review, and financial and accounting services in compliance with good business practices and generally accepted accounting principles, and engineering services in conformance with good engineering practices;

k. Upon request to provide information requested by TCEQ and perform such other tasks as the Court or TCEQ may require for proper operation of the receivership;

l. Take all measures necessary to consummate the conveyance of all assets of the said Water System and Utility to a qualified person, subject to written approval by TCEQ; and

m. Perform such other duties as may be prescribed by the Court.

23. Nothing contained herein shall be construed to authorize the Receiver to sell or transfer Water System and Utility without further orders and authorization from the Court.

24. Notwithstanding the provisions of Paragraph 23 above, the Receiver shall take affirmative steps to investigate prospects for the sale of the Water System and Utility and report those prospects to the Court and the parties of record.

25. Anyone purporting to act as the Owner/Operator, including Perrin Water and Texas Rain, all their agents, servants, employees, and all persons acting in concert with them, are ENJOINED to cooperate with the Receiver in said conveyance and shall promptly provide the Receiver with all documents and signatures necessary to complete the conveyance.

26. Subject to such orders as this Court may hereafter issue, the Receiver shall hold any money coming into the possession of the Receiver and not expended for any of the purposes authorized in this Agreed Order.

27. Within 45 days after taking his oath, the Receiver shall file in this cause an inventory of all property of the receivership estate of which he shall have possession. If the Receiver comes into possession of additional property, he shall file a supplemental inventory as soon as practicable, but in no event more than 45 days after receipt thereof.

28. Within 30 days after taking his oath, the Receiver shall notify in writing all known customers and creditors of the Water System and Utility that he has been appointed Receiver. This notice shall include a telephone number and address where the Receiver can be contacted.

29. On or before the 30th day of each month, the Receiver shall file with the Clerk of this Court a complete report for the prior month's activities. The first such report shall be due on . Each monthly report shall contain, at a minimum.

a. A monthly operating statement, including a statement of quantities of water sold, complaints received, and customers added or disconnected;

b. A statement of accounts receivable and payable, with actual amounts received and paid;

c. A summary of all repairs and improvements made, with expenses shown; and

d. A statement of all expenses incurred and paid.

When the Receiver files each monthly report, he shall simultaneously mail one copy of the report to each of the following: Plaintiff's attorney of record, Tyler J. Ryska, at the address provided below his signature, and TCEQ Receivership Coordinator, Alex Latham, at the Texas Commission on Environmental Quality, MC-153, P.O. Box 13087, Austin, Texas 78711-3087.

30. The Receiver shall limit expenditures to those reasonably necessary to accomplish the Receiver's duties. The Receiver is not obligated to pay bills, debts, or claims associated with the Water System and Utility that accrued before the date this Agreed Order is signed by the Court.

31. The Receiver's bond shall be set in the amount of $10,000.00.

32. The Receiver shall file his bond and duly executed oath with the Clerk of this Court within 5 business days from the date this Agreed Order is signed.

33. The Receiver shall maintain a bond at the amount set by this Court for the entire duration of the Receiver's service.

34. The Receiver shall file a report with the Clerk of this Court regarding any change in sureties or other changes to the bond, any lapse or forfeiture of a bond, and shall serve a copy of his report on all parties of record. The Receiver shall file such a report and serve copies on the parties immediately after he receives actual or constructive notice of the event requiring the report, but in any event, no later than 3 business days after actual or constructive notice to the Receiver.

35. The Receiver's compensation shall be a monthly fee of $12.00 per active Water System and Utility's connection per month of the Receiver's service, subject to the following conditions:

a. On a monthly basis, the Receiver may compensate himself for his services, but monthly payment shall not exceed 60% of the monthly fee set in Paragraph 35.

b. The remaining 40% of the Receiver's compensation may only be paid after a final accounting and a Court order approving the payment of the funds.

36. Defendants, the Receiver, or anyone of their behalf shall not make and this Court will not approve any claim against the State of Texas or any of its agencies, agents, servants, or employees, for any fees, costs, expenses, damages, or any other monetary claims incurred in relation to this receivership or lawsuit.

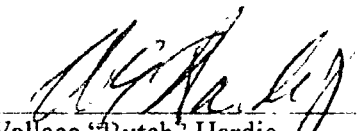
37. Plaintiff is allowed such writs and processes as may be needed for the enforcement of this Agreed Order.

38. This receivership shall continue until further order of the Court. The Court retains jurisdiction of this case and may make other orders as warranted.

SIGNED this _____ day of _____ _____, 2019.

_____
JUDGE PRESIDING

APPROVED IN FORM AND SUBSTANCE AND ENTRY REQUESTED:



7/23/19

Wallace "Butch" Hardie
Registered Agent, President, and Director
Texas Rain Holding Company, Inc.
P.O. Box 613
Mansfield, Texas 76063
butch@texasrainmgmt.com

Date

Defendant Texas Rain Holding Company, Inc.

APPROVED IN FORM AND SUBSTANCE AND ENTRY REQUESTED:

William Knowlton
Attorney
State Bar No. 11627500
P.O. Box 607
Henrietta, Texas 76376
940-538-6677
knowltonfirm@gmail.com

Date

Counsel for Defendant Perrin Water Systems, Inc.

APPROVED IN FORM AND SUBSTANCE AND ENTRY REQUESTED:

Mark Patterson
Patterson Professional Services
P.O. Box 910
Collinsville, Texas 76223
903-744-2599
pattproserv@aol.com

Date

Temporary Manager of Perrin Water System and Proposed Receiver

APPROVED IN FORM AND SUBSTANCE AND ENTRY REQUESTED:

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

DARREN L. MCCARTY
Deputy Attorney General for Civil Litigation

PRISCILLA M. HUBENAK
Chief, Environmental Protection Division

_____ Date

Tyler J. Ryska
Assistant Attorney General
Texas State Bar No. 24096597
Tyler.Ryska@oag.texas.gov

Office of the Attorney General
Environmental Protection Division
P.O. Box 12548, MC 066
Austin, Texas 78711-2548
Tel.: (512) 475-4156
Fax: (512) 320-0911

ATTORNEYS FOR THE STATE OF TEXAS

attachment i

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 15, 2020

CERTIFIED MAIL (7019 1120 0000 1758 1919)
RETURN RECEIPT REQUESTED

Mr. Mark Patterson
Patterson Professional Services
PO Box 910
Collinsville, Texas 76233-0910

And

Mr. David Fenoglio, Owner
Perrin Water System
206 W Highway 82
Nocona, Texas 76255-2618

Re: Unresolved Alleged Violations for Comprehensive Compliance Investigation at:
Perrin Water System, 215 S Smith Street, Perrin (Jack County), Texas
RN102681897, TCEQ ID No.: 1190005, Investigation No.: 1612528

Dear Mr. Patterson:

The Texas Commission on Environmental Quality (TCEQ) Abilene Region Office has previously requested that you submit compliance documentation for the alleged violations noted during the investigations of the above-referenced facility conducted on October 4, 2018; March 20, 2019; March 22, 2019; April 2, 2019; April 30, 2019; May 1, 2019; and May 3, 2019. We have received acceptable compliance documentation from you for all of the alleged violations except those listed in the enclosed summary. Please be advised that you are responsible for correcting the remaining problems. These unresolved alleged violations will be placed in your file to be evaluated during any subsequent investigation.

If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Nubia Estrada in the Abilene Region Office at (325) 698-9674.

Sincerely,

Cliff Moore
Water Section Work Leader
Abilene Region Office

CM/NE/cq

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

PERRIN WATER SYSTEM
215 S SMITH
PERRIN, JACK COUNTY, TX 76251

Additional ID(s): 1190005

Investigation # 1612528
Investigation Date: 01/07/2020

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

Track No: 699981 **Compliance Due Date: 04/16/2020**
30 TAC Chapter 290.42(m)

Alleged Violation:

Investigation: 1532685 Comment Date: 12/07/2018

Failure to keep the gate at the pump station locked.

Each water treatment plant and all appurtenances thereof shall be enclosed by an intruder-resistant fence. The gates shall be locked during periods of darkness and when the plant is unattended. A locked building in the fence line may satisfy this requirement or serve as a gate.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the pump station had been left unlocked.

Investigation: 1569974 Comment Date: 05/23/2019

Failure to keep the gate at the pump station locked.

Each water treatment plant and all appurtenances thereof shall be enclosed by an intruder-resistant fence. The gates shall be locked during periods of darkness and when the plant is unattended. A locked building in the fence line may satisfy this requirement or serve as a gate.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the pump station had been left unlocked.

During the CCI conducted April 2, 2019, it was noted the system was keeping the pump station locked. However, the pump station was not enclosed by an intruder-resistant fence as a breach (gap big enough for a full-sized individual to enter) on the fence (side next to the alley) was noted.

Investigation: 1603341 Comment Date: 10/15/2019

Failure to keep the gate at the pump station locked.

Each water treatment plant and all appurtenances thereof shall be enclosed by an intruder-resistant fence. The gates shall be locked during periods of darkness and when the plant is unattended. A locked building in the fence line may satisfy this requirement or serve as a gate.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the pump station had been left unlocked.

During the CCI conducted April 2, 2019, it was noted the system was keeping the pump station locked. However, the pump station was not enclosed by an intruder-resistant fence as a breach (gap big enough for a full-sized individual to enter) on the fence (side next to the alley) was noted.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Failure to flush dead-end mains monthly.

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

During the comprehensive compliance investigation (CCI) conducted April 2, 2019, it was noted the system was not flushing all dead-end mains monthly. The water system operator indicated the system's dead-end main locations were unknown and thus, were not being flushed.

During the file record review (FRR) investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit flushing records to the Abilene Regional Office noting all dead-end mains have been identified and are being flushed monthly in accordance with 30 TAC Chapter 290 by the compliance due date. The flushing records need to include all the system dead-end main locations (addresses) along with the date each was flushed.

Track No: 715721 **Compliance Due Date: 04/16/2020**

30 TAC Chapter 290.46(n)(2)

Alleged Violation:

Investigation: 1569974 Comment Date: 05/23/2019

Failure to provide an accurate and up-to-date map of the distribution system.

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

During the CCI conducted April 2, 2019, it was noted that Perrin Water System did not have an accurate and up-to-date map of the distribution system. The map provided did not include system valves and stated all water system lines were 2 inch steel. The operator stated the system had a mixture of 1-¼ inch and ½ inch steel lines and 3 inch PVC pipes. The map also appears to indicate the Perrin School is connected to the distribution system. The Perrin School is not connected to the Perrin WS and is recognized by the TCEQ as a separate public water supply system.

Investigation: 1603341 Comment Date: 10/15/2019

Failure to provide an accurate and up-to-date map of the distribution system.

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

During the CCI conducted April 2, 2019, it was noted that Perrin Water System did not have an accurate and up-to-date map of the distribution system. The map provided did not include system valves and stated all water system lines were 2 inch steel. The operator stated the system had a mixture of 1-¼ inch and ½ inch steel lines and 3 inch PVC pipes. The map also appears to indicate the Perrin School is connected to the distribution system. The Perrin School is not connected to the Perrin WS and is recognized by the TCEQ as a separate public water supply system.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation. 1612528 Comment Date: 01/07/2020

Failure to provide an accurate and up-to-date map of the distribution system.

An accurate and up-to-date map of the distribution system shall be available so that valves

Plans, specifications, maps, and other pertinent information shall be maintained to facilitate the operation and maintenance of the system's facilities and equipment. The following records shall be maintained on file at the public water system and be available to the executive director upon request 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

During the CCI conducted April 2, 2019, no records were made available to indicate the system was maintaining the system's detailed as-built plans or records drawings for the storage and pump facility.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit to the Abilene Regional office copies of the system's detailed as-built plans or records drawings in accordance with 30 TAC Chapter 290 by the compliance due date.

Track No: 715723 **Compliance Due Date: 04/16/2020**

30 TAC Chapter 290.43(c)(7)

Alleged Violation:

Investigation: 1569974 Comment Date: 05/23/2019

Failure to provide each ground storage tank with a means of removing accumulated silt and deposits at low points in the bottom of the tank.

Each clearwell or potable water storage tank shall be provided with a means of removing accumulated silt and deposits at all low points in the bottom of the tank. Drains shall not be connected to any waste or sewage disposal system and shall be constructed so that they are not a potential agent in the contamination of the stored water. Each clearwell or potable water storage tank must be designed to drain the tank.

During the CCI conducted April 2, 2019, it was noted only the middle ground storage tank had a drain pipe provided. The operator indicated drainage of the two other tanks occurred at the same time as the middle tank as they were all connected by the same drainage pipe. Each tank was noted not to have the ability to be drained individually.

Investigation: 1603341 Comment Date. 10/15/2019

Failure to provide each ground storage tank with a means of removing accumulated silt and deposits at low points in the bottom of the tank.

Each clearwell or potable water storage tank shall be provided with a means of removing accumulated silt and deposits at all low points in the bottom of the tank. Drains shall not be connected to any waste or sewage disposal system and shall be constructed so that they are not a potential agent in the contamination of the stored water. Each clearwell or potable water storage tank must be designed to drain the tank.

During the CCI conducted April 2, 2019, it was noted only the middle ground storage tank had a drain pipe provided. The operator indicated drainage of the two other tanks occurred at the same time as the middle tank as they were all connected by the same drainage pipe. Each tank was noted not to have the ability to be drained individually.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide each ground storage tank with a means of removing accumulated silt and deposits at low points in the bottom of the tank.

not provided with the necessary fittings and which were installed before July 1, 1988 shall be exempt from this requirement.

During the CCI conducted April 2, 2019, it was noted the pressure tank's pressure release device had rusted shut due to leaking. The tank was also missing a pressure gauge and the air-water-volume indicator had been turned off.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide the pressure tank with a working pressure release device and pressure gauge.

All pressure tanks shall be provided with a pressure release device and an easily readable pressure gauge.

Design and construction of pressure (hydropneumatic) tanks. All hydropneumatic tanks must be located wholly above grade and must be of steel construction with welded seams except as provided in paragraph (8) of this subsection. Facilities shall be provided for maintaining the air-water-volume at the design water level and working pressure. Air injection lines must be equipped with filters or other devices to prevent compressor lubricants and other contaminants from entering the pressure tank. A device to readily determine air-water-volume must be provided for all tanks greater than 1,000 gallon capacity. Galvanized tanks which are not provided with the necessary fittings and which were installed before July 1, 1988 shall be exempt from this requirement.

During the CCI conducted April 2, 2019, it was noted the pressure tank's pressure release device had rusted shut due to leaking. The tank was also missing a pressure gauge and the air-water-volume indicator had been turned off.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit photographic documentation to the Abilene Regional Office noting the pressure tank has been provided with a working pressure release device and pressure gauge in accordance with 30 TAC 290 by the compliance due date.

Track No: 715726 **Compliance Due Date: 04/16/2020**

30 TAC Chapter 290.110(d)(1)
30 TAC Chapter 290.46(s)(2)(C)
30 TAC Chapter 290.46(s)(2)(C)(i)

Alleged Violation:

Investigation: 1569974 Comment Date: 05/23/2019

Failure to provide information relating to the chlorine residual analyzer used for compliance reporting.

Chemical disinfectant residual analyzers shall be properly calibrated.

The accuracy of manual disinfectant residual analyzers shall be verified at least once every 90 days using chlorine solutions of known concentrations.

The free chlorine or chloramine residual (measured as total chlorine) must be measured to a minimum accuracy of plus or minus 0.1 mg/L. Color comparators may be used for distribution system samples only. When used, a color comparator must have current reagents, an unfaded and clear color comparator, a sample cell that is not discolored or stained, and must be properly stored in a cool, dark location where it is not subjected to conditions that would result in staining. The color comparator must be used in the correct range. If a sample reads at the top of the range, the sample must be diluted with chlorine-free water, then a reading

color comparator is not used, calibration verification records must be submitted along with the photographs indicating the chlorine method calibration is being verified at least once every 90 days.

Track No: 715727 **Compliance Due Date: 04/16/2020**

30 TAC Chapter 290.41(c)(3)(N)
30 TAC Chapter 290.46(s)(1)

Alleged Violation:

Investigation: 1569974 Comment Date: 05/23/2019

Failure to have properly working well meters

Flow-measuring devices shall be provided for each well to measure production yields and provide for the accumulation of water production data. These devices shall be located to facilitate daily reading.

Flow-measuring devices and rate-of-flow controllers that are required by §290.42(b) and (d) of this title (relating to Water Treatment) shall be calibrated at least once every 12 months. Well meters required by §290.41(c)(3)(N) of this title shall be calibrated at least once every three years.

During the CCI conducted April 2, 2019, it was noted the system had three wells, but one well was down (well #3). The system had records indicating the calibration of the well meters on well #2 and #4 had been checked on April 20, 2016. However, operator notes at the bottom of the monthly operating reports indicated the well meters on the wells stopped working on September 2018.

Investigation: 1603341 Comment Date: 10/15/2019

Failure to have properly working well meters.

Flow-measuring devices shall be provided for each well to measure production yields and provide for the accumulation of water production data. These devices shall be located to facilitate daily reading.

Flow-measuring devices and rate-of-flow controllers that are required by §290.42(b) and (d) of this title (relating to Water Treatment) shall be calibrated at least once every 12 months. Well meters required by §290.41(c)(3)(N) of this title shall be calibrated at least once every three years.

During the CCI conducted April 2, 2019, it was noted the system had three wells, but one well was down (well #3). The system had records indicating the calibration of the well meters on well #2 and #4 had been checked on April 20, 2016. However, operator notes at the bottom of the monthly operating reports indicated the well meters on the wells stopped working on September 2018

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to have properly working well meters.

Flow-measuring devices shall be provided for each well to measure production yields and provide for the accumulation of water production data These devices shall be located to facilitate daily reading.

Flow-measuring devices and rate-of-flow controllers that are required by §290.42(b) and (d) of this title (relating to Water Treatment) shall be calibrated at least once every 12 months. Well meters required by §290 41(c)(3)(N) of this title shall be calibrated at least once every three years.

During the CCI conducted April 2, 2019, it was noted the system had three wells, but one well was down (well #3). The system had records indicating the calibration of the well meters on

system, more complaint records should have been available.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit to the Abilene Regional Office documentation noting how the system will ensure complaint records are kept in accordance with 30 TAC Chapter 290 by the compliance due date.

Track No: 715729 **Compliance Due Date: 04/16/2020**

30 TAC Chapter 290.46(m)(4)
30 TAC Chapter 290.46(m)(6)

Alleged Violation:

Investigation: 1569974 Comment Date: 05/23/2019

Failure to maintain the pump station and well #3 in working condition.

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. All water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances shall be maintained in a watertight condition and be free of excessive solids.

Pumps, motors, valves, and other mechanical devices shall be maintained in good working condition.

During the CCI conducted April 2, 2019 it was noted the pump station grounds were saturated in water with the grass beginning to overtake the pump station. Empty bottles of chlorine bleach and other mechanical parts were spread out throughout the pump station. The service pump was strapped to the pvc lines to prevent it from blowing them out. All electrical circuits for pump number two were out and the system was noted to have had various electrical issues throughout the month of March 2019. Well #3 was also noted to be down.

Investigation: 1603341 Comment Date: 10/15/2019

Failure to maintain the pump station and well #3 in working condition.

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. All water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances shall be maintained in a watertight condition and be free of excessive solids.

Pumps, motors, valves, and other mechanical devices shall be maintained in good working condition.

During the CCI conducted April 2, 2019 it was noted the pump station grounds were saturated in water with the grass beginning to overtake the pump station. Empty bottles of chlorine bleach and other mechanical parts were spread out throughout the pump station. The service pump was strapped to the pvc lines to prevent it from blowing them out. All electrical circuits for pump number two were out and the system was noted to have had various electrical issues throughout the month of March 2019. Well #3 was also noted to be down.

On May 5, 2019, documentation was submitted to the TCEQ Central and Abilene Regional Offices indicating electrical work had been performed at the pump station, a peristaltic pump to inject chlorine had been installed, a well control system to operate wells off of floats in the storage tanks had been provided, and a cellular autodialer to alert the system when issues

30 TAC Chapter 290.121(b)(1)(B)
30 TAC Chapter 290.121(b)(1)(B)(i)
30 TAC Chapter 290.121(b)(1)(B)(ii)
30 TAC Chapter 290.121(b)(1)(C)
30 TAC Chapter 290.121(b)(1)(C)(i)
30 TAC Chapter 290.121(b)(1)(C)(ii)
30 TAC Chapter 290.121(b)(1)(C)(iii)
30 TAC Chapter 290.121(b)(1)(D)
30 TAC Chapter 290.121(b)(2)
30 TAC Chapter 290.121(b)(2)(A)
30 TAC Chapter 290.121(b)(2)(B)
30 TAC Chapter 290.121(b)(3)
30 TAC Chapter 290.121(b)(5)
30 TAC Chapter 290.121(b)(6)
30 TAC Chapter 290.121(b)(7)
30 TAC Chapter 290.121(b)(8)
30 TAC Chapter 290.121(d)(2)

Alleged Violation:

Investigation: 1569974 Comment Date: 05/23/2019

Failure to have a complete and up-to-date chemical and microbiological monitoring plan.

All public water systems shall maintain an up-to-date chemical and microbiological monitoring plan. Monitoring plans are subject to the review and approval of the executive director. A copy of the monitoring plan must be maintained at each water treatment plant and at a central location.

The monitoring plan shall include information on the location of all required sampling points in the system. Required sampling locations for regulated chemicals are provided in§290.106 of this title (relating to Inorganic Contaminants), §290.107 of this title (relating to Organic Contaminants), §290.108 of this title (relating to Radionuclides Other than Radon), §290 109 of this title (relating to Microbial Contaminants), §290.110 of this title (relating to Disinfectant Residuals), §290.111 of this title (relating to Surface Water Treatment), §290.112 of this title (relating to Total Organic Carbon (TOC)), §290.113 of this title (relating to Stage 1 Disinfection Byproducts (TTHM and HAA5)), §290.114 of this title (relating to Other Disinfection Byproducts (Chlorite and Bromate)), §290.115 of this title (relating to Stage 2 Disinfection Byproducts (TTHM and HAA5)), §290.116 of this title (Relating to Groundwater Corrective Actions and Treatment Techniques), §290.117 of this title (relating to Regulation of Lead and Copper), and §290.118 of this title (relating to Secondary Constituent Levels).

- The location of each sampling site at a treatment plant or pump station must be designated on a plant schematic. The plant schematic must show all water pumps, flow meters, unit processes, chemical feed points, and chemical monitoring points. The plant schematic must also show the origin of any flow stream that is recycled at the treatment plant, any pretreatment that occurs before the recycle stream is returned to the primary treatment process, and the location where the recycle stream is reintroduced to the primary treatment process.
- Each entry point to the distribution system shall be identified in the monitoring plan as follows: a written description of the physical location of each entry point to the distribution system shall be provided; or the location of each entry point shall be indicated clearly on a distribution system or treatment plant schematic.
- The address of each sampling site in the distribution system shall be included in the monitoring plan or the location of each distribution system sampling site shall be designated on a distribution system schematic. The distribution system schematic shall clearly indicate the following: the location of all pump stations in the distribution system; the location of all ground and elevated storage tanks in the distribution system; and the location of all chemical feed points in the distribution system.
- The system must revise its monitoring plan if changes to a plant or distribution system require changes to the sampling locations.

The monitoring plan must include a written description of sampling frequency and schedule.

- The monitoring plan must include a list of all routine samples required on a daily, weekly, monthly, quarterly, annual, or less frequent basis and identify the sampling location where the

process, and the location where the recycle stream is reintroduced to the primary treatment process.

- Each entry point to the distribution system shall be identified in the monitoring plan as follows: a written description of the physical location of each entry point to the distribution system shall be provided; or the location of each entry point shall be indicated clearly on a distribution system or treatment plant schematic.
- The address of each sampling site in the distribution system shall be included in the monitoring plan or the location of each distribution system sampling site shall be designated on a distribution system schematic. The distribution system schematic shall clearly indicate the following: the location of all pump stations in the distribution system; the location of all ground and elevated storage tanks in the distribution system; and the location of all chemical feed points in the distribution system.
- The system must revise its monitoring plan if changes to a plant or distribution system require changes to the sampling locations.

The monitoring plan must include a written description of sampling frequency and schedule.

- The monitoring plan must include a list of all routine samples required on a daily, weekly, monthly, quarterly, annual, or less frequent basis and identify the sampling location where the samples will be collected.
- The system must maintain a current record of the sampling schedule.

The monitoring plan shall include the public water system's Sample Siting Plan as required by §290.109(d)(1) - (6) of this title. The public water system's Sample Siting Plan shall include a list of all microbial distribution compliance monitoring sites as required by §290.109(d) of this title, including all routine and repeat microbial sample sites. As required by §290.109(d)(2)(G) of this title, a public water system that collects more than the minimum number of required routine microbial samples shall include the additional routine sample sites in the public water system's Sample Siting Plan. In addition, a public water system that is required to collect any associated raw groundwater source(s) compliance samples, as required by §290.109(d)(4) of this title, shall include the microbial raw groundwater well compliance sites in the public water system's Sample Siting Plan. The repeat sample sites, as required by §290.109(d)(3) of this title, shall be associated to their originating routine microbial sample sites. The Sample Siting Plan shall include all groundwater sources and any associated sampling points necessary to meet the requirements of §290.109(d) of this title.

The monitoring plan must identify all laboratory facilities that may be used to analyze samples required by this chapter.

The monitoring plan shall include a written description of the methods used to calculate compliance with all maximum contaminant levels, maximum residual disinfectant levels, and treatment techniques that apply to the system.

The monitoring plan shall include any groundwater source water monitoring plan developed under §290.109(d)(4) of this title to specify well sampling for triggered coliform monitoring.

The monitoring plan shall include any initial distribution system evaluation compliance documentation required by §290.115(c)(5) of this title. The monitoring plan must be revised to show Stage 2 sample sites by the date shown in Figure. 30 TAC §290.115(a)(2) titled "Date to Start Stage 2 compliance."

A public water system that fails to maintain an up-to-date monitoring plan commits a monitoring violation.

During the CCI conducted April 4, 2019, it was noted the system's monitoring plan needed updating and did not include all the required elements. The system was also noted not to have a revised total coliform rule (RTCR) sample siting plan and map.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to have a complete and up-to-date chemical and microbiological monitoring plan.

All public water systems shall maintain an up-to-date chemical and microbiological monitoring

under §290.109(d)(4) of this title to specify well sampling for triggered coliform monitoring.

The monitoring plan shall include any initial distribution system evaluation compliance documentation required by §290.115(c)(5) of this title. The monitoring plan must be revised to show Stage 2 sample sites by the date shown in Figure: 30 TAC §290.115(a)(2) titled "Date to Start Stage 2 compliance."

A public water system that fails to maintain an up-to-date monitoring plan commits a monitoring violation.

During the CCI conducted April 4, 2019, it was noted the system's monitoring plan needed updating and did not include all the required elements. The system was also noted not to have a revised total coliform rule (RTCR) sample siting plan and map.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit a revised monitoring plan to the Abilene Regional Office that is up-to-date and includes all the required components in accordance with 30 TAC Chapter 290 by the compliance due date.

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

Track No: 698551

30 TAC Chapter 290.46(t)

Alleged Violation:

Investigation: 1530857 Comment Date: 11/19/2018

Failure to have a proper system ownership sign at the production, treatment, and storage facility.

All community water systems shall post a legible sign at each of its production, treatment, and storage facilities. The sign shall be located in plain view of the public and shall provide the name of the water supply and an emergency telephone number where a responsible official can be contacted.

During the complaint investigation conducted on October 4, 2018 it was noted the ownership sign at the pump station located on S Smith Street did not include an emergency telephone number where a responsible official can be contacted.

Investigation: 1569974 Comment Date: 05/23/2019

Failure to have a proper system ownership sign at the production, treatment, and storage facility.

All community water systems shall post a legible sign at each of its production, treatment, and storage facilities. The sign shall be located in plain view of the public and shall provide the name of the water supply and an emergency telephone number where a responsible official can be contacted.

During the complaint investigation conducted on October 4, 2018 it was noted the ownership sign at the pump station located on S Smith Street did not include an emergency telephone number where a responsible official can be contacted.

During the CCI conducted April 2, 2019, it was noted the ownership sign at the pump station located on S Smith Street, the well #4 enclosure, and the well #3 enclosure either did not include an emergency telephone number or did not include a current, reliable phone number where a responsible official can be contacted in the case of an emergency.

Failure to provide a lock to the fence at well #2.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #2 enclosure was left unlocked, with no lock provided.

Investigation: 1569974 Comment Date. 05/23/2019

Failure to provide a lock to the fence at well #4.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #4 enclosure was left unlocked, with no lock provided.

During the CCI conducted April 2, 2019 it was noted no lock had been provided to the gate at the well #4 enclosure. It was additionally noted the well #3 enclosure was also unlocked and had not been provided with a lock.

Investigation: 1603341 Comment Date. 10/15/2019

Failure to provide a lock to the fence at well #2.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #2 (#4) enclosure was left unlocked, with no lock provided.

During the CCI conducted April 2, 2019 it was noted no lock had been provided to the gate at the well #2 (#4) enclosure. It was additionally noted the well #3 enclosure was also unlocked and had not been provided with a lock.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide a lock to the fence at well #2.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #2 (#4) enclosure was left unlocked, with no lock provided.

During the CCI conducted April 2, 2019 it was noted no lock had been provided to the gate at the well #2 (#4) enclosure. It was additionally noted the well #3 enclosure was also unlocked and had not been provided with a lock.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit photographic documentation to the Abilene Regional Office indicating the gates at wells #4 and #3 have been provided with a lock that is being kept locked in accordance with 30 TAC Chapter 290 by the compliance due date.

During a complaint investigation conducted on December 12, 2018 it was noted the tank overflow connection had a hose attached that was discharging water onto ~~the ground at~~ the pump station near the foundation of the tank. The hose discharge opening was not provided with a cover or a screen. The overflow also had leaking connections.

During the CCI conducted April 2, 2019 it was noted the overflow to the ground storage tanks had not been repaired to meet current AWWWA standards. During the inspection, the opening to the overflow was screened, but nothing else was repaired.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide a proper overflow to the ground storage tanks.

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.

During a complaint investigation conducted on December 12, 2018 it was noted the tank overflow connection had a hose attached that was discharging water onto the ground at the pump station near the foundation of the tank. The hose discharge opening was not provided with a cover or a screen. The overflow also had leaking connections.

During the CCI conducted April 2, 2019 it was noted the overflow to the ground storage tanks had not been repaired to meet current AWWWA standards. During the inspection, the opening to the overflow was screened, but nothing else was repaired.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit photographic documentation to the Abilene Regional Office indicating the tanks at the pump station have been provided with an overflow that is in accordance with current AWWA standards and with 30 TAC Chapter 290 by the compliance due date.

Resolution: Documentation was received in the Abilene Regional Office on December 9, 2019, indicating the system had provided each tank with its own overflow and installed a flapper style check valve at the opening of each overflow. Photographs of the overflows were submitted indicating the overflows were above the surface of the ground. The documentation is adequate to resolve the violation.

Track No: 714975

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 1569171 Comment Date: 05/16/2019

Failure to provide water tight piping in the distribution system.

All water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances shall be maintained in a watertight condition and be free of excessive solids.

During the complaint investigation conducted on March 20 and 22, 2019, leaks were documented at the following locations:

1) The water meter next to the trailer houses in the alley between W. Alley Street and W.

Summary of Investigation Findings

PERRIN WATER SYSTEM Investigation # 1612528

215 S SMITH
PERRIN, JACK COUNTY, TX 76251

Investigation Date: 01/07/2020

Additional ID(s): 1190005

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 698546

30 TAC Chapter 290.110(b)(4)
30 TAC Chapter 290.46(d)
30 TAC Chapter 290.46(d)(2)
30 TAC Chapter 290.46(d)(2)(A)

Alleged Violation:

Investigation: 1530857 Comment Date: 11/19/2018

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 4, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via phone and an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 4, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via phone and an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

throughout the distribution system The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times· a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 10, 2018, it was documented the free chlorine residual tested at one location within distribution was 0 00 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Investigation. 1612528 Comment Date: 01/07/2020

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 10, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.00 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Recommended Corrective Action: Please submit documentation indicating that the free chlorine residual in the distribution system is at least 0.2 mg/L in accordance with Title 30 Texas Administrative Code (TAC) Chapter 290.

Resolution: This violation is administratively resolved. It was combined with violation 665040 for the court order.

Track No: 699980

30 TAC Chapter 290.110(b)(4)
30 TAC Chapter 290.46(d)
30 TAC Chapter 290.46(d)(2)
30 TAC Chapter 290.46(d)(2)(A)

Alleged Violation:

Investigation: 1532685 Comment Date: 12/07/2018

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times· a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 18, 2018, it was documented the free chlorine residual tested at two locations within distribution was 0.03 mg/L and 0.02 mg/L. The

Investigation: 1612528 Comment Date: 01/07/2020

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on November 16, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Recommended Corrective Action: Please submit documentation indicating the free chlorine residual in the distribution system is at least 0.2 mg/L in accordance with Title 30 Texas Administrative Code (TAC) Chapter 290.

Resolution: This violation is administratively resolved It was combined with violation 665040 for the court order.

Track No: 704070

30 TAC Chapter 290.110(b)(4)
30 TAC Chapter 290.46(d)
30 TAC Chapter 290.46(d)(2)
30 TAC Chapter 290.46(d)(2)(A)

Alleged Violation:

Investigation: 1541042 Comment Date: 01/31/2019

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on December 12, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to maintain the required free chlorine residual of 0 2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

Item 27	Failure to extend the well casing a minimum of 18 inches above the elevation of the finished floor of the pump house or natural ground surface. Agreed Commission Order Docket Number 2017-1541-PWS-E, Violation Tracking # 653546 and 653567. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.
Item 26	Failure to meet current American Water Works Association (AWWA) design and construction standards on the three ground storage tanks. Agreed Commission Order Docket Number 2017-1541-PWS-E, Violation Tracking # 653546 and 653567. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.
Item 29	Failure to maintain a free chlorine residual of 0.2 mg/L throughout the distribution system at all times. Final Default Judgment and Permanent Injunction Cause No. D-1-GN-18-005908, IV. Permanent Injunction, B.1 requires a minimum free chlorine residual of 0.2 mg/L be maintained in the distribution system. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.
Item 28	Failure to provide a minimum well capacity of 0.6 gallons per minute (gpm) per connection. Agreed Commission Order Docket Number 2017-1541-PWS-E, Violation Tracking # 653569. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 15, 2020

CERTIFIED MAIL (7019 1120 0000 1758 1964)
RETURN RECEIPT REQUESTED

Mr. David Fenoglio, Owner
Perrin Water System
206 W Highway 82
Nocona, Texas 76255-2618

And

Mr. Mark Patterson
Patterson Professional Services
PO Box 910
Collinsville, Texas 76233-0910

Re: Unresolved Alleged Violations for Comprehensive Compliance Investigation at:
Perrin Water System, 215 S Smith Street, Perrin (Jack County), Texas
RN102681897, TCEQ ID No.: 1190005, Investigation No.: 1612528

Dear Mr. Fenoglio:

The Texas Commission on Environmental Quality (TCEQ) Abilene Region Office has previously requested that you submit compliance documentation for the alleged violations noted during the investigations of the above-referenced facility conducted on October 4, 2018; March 20, 2019; March 22, 2019; April 2, 2019; April 30, 2019; May 1, 2019; and May 3, 2019. We have received acceptable compliance documentation from you for all of the alleged violations except those listed in the enclosed summary. Please be advised that you are responsible for correcting the remaining problems. These unresolved alleged violations will be placed in your file to be evaluated during any subsequent investigation.

If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Nubia Estrada in the Abilene Region Office at (325) 698-9674.

Sincerely,

Cliff Moore
Water Section Work Leader
Abilene Region Office

CM/NE/cq

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

PERRIN WATER SYSTEM
216 S SMITH
PERRIN, JACK COUNTY, TX 76251

Additional ID(s): 1190005

Investigation # 1612528
Investigation Date: 01/07/2020

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

Track No: 699881 **Compliance Due Date: 04/16/2020**
30 TAC Chapter 290.42(m)

Alleged Violation:
Investigation: 1532685 Comment Date: 12/07/2018

Failure to keep the gate at the pump station locked.

Each water treatment plant and all appurtenances thereof shall be enclosed by an intruder-resistant fence. The gates shall be locked during periods of darkness and when the plant is unattended. A locked building in the fence line may satisfy this requirement or serve as a gate.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the pump station had been left unlocked.

Investigation: 1569974 Comment Date: 05/23/2019

Failure to keep the gate at the pump station locked.

Each water treatment plant and all appurtenances thereof shall be enclosed by an intruder-resistant fence. The gates shall be locked during periods of darkness and when the plant is unattended. A locked building in the fence line may satisfy this requirement or serve as a gate.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the pump station had been left unlocked.

During the CCI conducted April 2, 2019, it was noted the system was keeping the pump station locked. However, the pump station was not enclosed by an intruder-resistant fence as a breach (gap big enough for a full-sized individual to enter) on the fence (side next to the alley) was noted.

Investigation: 1603341 Comment Date: 10/15/2019

Failure to keep the gate at the pump station locked.

Each water treatment plant and all appurtenances thereof shall be enclosed by an intruder-resistant fence. The gates shall be locked during periods of darkness and when the plant is unattended. A locked building in the fence line may satisfy this requirement or serve as a gate.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the pump station had been left unlocked.

During the CCI conducted April 2, 2019, it was noted the system was keeping the pump station locked. However, the pump station was not enclosed by an intruder-resistant fence as a breach (gap big enough for a full-sized individual to enter) on the fence (side next to the alley) was noted.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Failure to flush dead-end mains monthly.

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

During the comprehensive compliance investigation (CCI) conducted April 2, 2019, it was noted the system was not flushing all dead-end mains monthly. The water system operator indicated the system's dead-end main locations were unknown and thus, were not being flushed.

During the file record review (FRR) investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit flushing records to the Abilene Regional Office noting all dead-end mains have been identified and are being flushed monthly in accordance with 30 TAC Chapter 290 by the compliance due date. The flushing records need to include all the system dead-end main locations (addresses) along with the date each was flushed.

Track No: 715721 **Compliance Due Date: 04/16/2020**
30 TAC Chapter 290.46(n)(2)

Alleged Violation:
Investigation: 1569874 Comment Date: 05/23/2019

Failure to provide an accurate and up-to-date map of the distribution system.

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

During the CCI conducted April 2, 2019, it was noted that Perrin Water System did not have an accurate and up-to-date map of the distribution system. The map provided did not include system valves and stated all water system lines were 2 inch steel. The operator stated the system had a mixture of 1-¼ inch and ½ inch steel lines and 3 inch PVC pipes. The map also appears to indicate the Perrin School is connected to the distribution system. The Perrin School is not connected to the Perrin WS and is recognized by the TCEQ as a separate public water supply system.
Investigation: 1603341 Comment Date: 10/15/2019

Failure to provide an accurate and up-to-date map of the distribution system.

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

During the CCI conducted April 2, 2019, it was noted that Perrin Water System did not have an accurate and up-to-date map of the distribution system. The map provided did not include system valves and stated all water system lines were 2 inch steel. The operator stated the system had a mixture of 1-¼ inch and ½ inch steel lines and 3 inch PVC pipes. The map also appears to indicate the Perrin School is connected to the distribution system. The Perrin School is not connected to the Perrin WS and is recognized by the TCEQ as a separate public water supply system.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.
Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide an accurate and up-to-date map of the distribution system.

An accurate and up-to-date map of the distribution system shall be available so that valves

Plans, specifications, maps, and other pertinent information shall be maintained to facilitate the operation and maintenance of the system's facilities and equipment. The following records shall be maintained on file at the public water system and be available to the executive director upon request: 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.

During the CCI conducted April 2, 2019, no records were made available to indicate the system was maintaining the system's detailed as-built plans or records drawings for the storage and pump facility.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit to the Abilene Regional office copies of the system's detailed as-built plans or records drawings in accordance with 30 TAC Chapter 290 by the compliance due date.

Track No: 715723 **Compliance Due Date: 04/16/2020**
30 TAC Chapter 290.43(c)(7)

Alleged Violation:
Investigation: 1569974 Comment Date: 05/23/2019

Failure to provide each ground storage tank with a means of removing accumulated silt and deposits at low points in the bottom of the tank.

Each clearwell or potable water storage tank shall be provided with a means of removing accumulated silt and deposits at all low points in the bottom of the tank. Drains shall not be connected to any waste or sewage disposal system and shall be constructed so that they are not a potential agent in the contamination of the stored water. Each clearwell or potable water storage tank must be designed to drain the tank.

During the CCI conducted April 2, 2019, it was noted only the middle ground storage tank had a drain pipe provided. The operator indicated drainage of the two other tanks occurred at the same time as the middle tank as they were all connected by the same drainage pipe. Each tank was noted not to have the ability to be drained individually.
Investigation: 1603341 Comment Date: 10/15/2019

Failure to provide each ground storage tank with a means of removing accumulated silt and deposits at low points in the bottom of the tank.

Each clearwell or potable water storage tank shall be provided with a means of removing accumulated silt and deposits at all low points in the bottom of the tank. Drains shall not be connected to any waste or sewage disposal system and shall be constructed so that they are not a potential agent in the contamination of the stored water. Each clearwell or potable water storage tank must be designed to drain the tank.

During the CCI conducted April 2, 2019, it was noted only the middle ground storage tank had a drain pipe provided. The operator indicated drainage of the two other tanks occurred at the same time as the middle tank as they were all connected by the same drainage pipe. Each tank was noted not to have the ability to be drained individually.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.
Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide each ground storage tank with a means of removing accumulated silt and deposits at low points in the bottom of the tank.

not provided with the necessary fittings and which were installed before July 1, 1988 shall be exempt from this requirement.

During the CCI conducted April 2, 2019, it was noted the pressure tank's pressure release device had rusted shut due to leaking. The tank was also missing a pressure gauge and the air-water-volume indicator had been turned off.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide the pressure tank with a working pressure release device and pressure gauge.

All pressure tanks shall be provided with a pressure release device and an easily readable pressure gauge.

Design and construction of pressure (hydropneumatic) tanks. All hydropneumatic tanks must be located wholly above grade and must be of steel construction with welded seams except as provided in paragraph (8) of this subsection. Facilities shall be provided for maintaining the air-water-volume at the design water level and working pressure. Air injection lines must be equipped with filters or other devices to prevent compressor lubricants and other contaminants from entering the pressure tank. A device to readily determine air-water-volume must be provided for all tanks greater than 1,000 gallon capacity. Galvanized tanks which are not provided with the necessary fittings and which were installed before July 1, 1988 shall be exempt from this requirement.

During the CCI conducted April 2, 2019, it was noted the pressure tank's pressure release device had rusted shut due to leaking. The tank was also missing a pressure gauge and the air-water-volume indicator had been turned off.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit photographic documentation to the Abilene Regional Office noting the pressure tank has been provided with a working pressure release device and pressure gauge in accordance with 30 TAC 290 by the compliance due date.

Track No: 715726 **Compliance Due Date: 04/16/2020**

30 TAC Chapter 290.110(d)(1)
30 TAC Chapter 290.46(s)(2)(C)
30 TAC Chapter 290.46(s)(2)(C)(i)

Alleged Violation:

Investigation: 1569974 Comment Date: 05/23/2019

Failure to provide information relating to the chlorine residual analyzer used for compliance reporting.

Chemical disinfectant residual analyzers shall be properly calibrated.

The accuracy of manual disinfectant residual analyzers shall be verified at least once every 90 days using chlorine solutions of known concentrations.

The free chlorine or chloramine residual (measured as total chlorine) must be measured to a minimum accuracy of plus or minus 0.1 mg/L. Color comparators may be used for distribution system samples only. When used, a color comparator must have current reagents, an unfaded and clear color comparator, a sample cell that is not discolored or stained, and must be properly stored in a cool, dark location where it is not subjected to conditions that would result in staining. The color comparator must be used in the correct range. If a sample reads at the top of the range, the sample must be diluted with chlorine-free water, then a reading

color comparator is not used, calibration verification records must be submitted along with the photographs indicating the chlorine method calibration is being verified at least once every 90 days.

Track No: 715727 Compliance Due Date: 04/16/2020
30 TAC Chapter 290.41(c)(3)(N)
30 TAC Chapter 290.46(s)(1)

Alleged Violation:
Investigation: 1569974 Comment Date: 05/23/2019

Failure to have properly working well meters.

Flow-measuring devices shall be provided for each well to measure production yields and provide for the accumulation of water production data. These devices shall be located to facilitate daily reading.

Flow-measuring devices and rate-of-flow controllers that are required by §290.42(b) and (d) of this title (relating to Water Treatment) shall be calibrated at least once every 12 months. Well meters required by §290.41(c)(3)(N) of this title shall be calibrated at least once every three years.

During the CCI conducted April 2, 2019, it was noted the system had three wells, but one well was down (well #3). The system had records indicating the calibration of the well meters on well #2 and #4 had been checked on April 20, 2016. However, operator notes at the bottom of the monthly operating reports indicated the well meters on the wells stopped working on September 2018.

Investigation: 1603341 Comment Date: 10/15/2019

Failure to have properly working well meters.

Flow-measuring devices shall be provided for each well to measure production yields and provide for the accumulation of water production data. These devices shall be located to facilitate daily reading.

Flow-measuring devices and rate-of-flow controllers that are required by §290.42(b) and (d) of this title (relating to Water Treatment) shall be calibrated at least once every 12 months. Well meters required by §290.41(c)(3)(N) of this title shall be calibrated at least once every three years.

During the CCI conducted April 2, 2019, it was noted the system had three wells, but one well was down (well #3). The system had records indicating the calibration of the well meters on well #2 and #4 had been checked on April 20, 2016. However, operator notes at the bottom of the monthly operating reports indicated the well meters on the wells stopped working on September 2018.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to have properly working well meters.

Flow-measuring devices shall be provided for each well to measure production yields and provide for the accumulation of water production data. These devices shall be located to facilitate daily reading.

Flow-measuring devices and rate-of-flow controllers that are required by §290.42(b) and (d) of this title (relating to Water Treatment) shall be calibrated at least once every 12 months. Well meters required by §290.41(c)(3)(N) of this title shall be calibrated at least once every three years.

During the CCI conducted April 2, 2019, it was noted the system had three wells, but one well was down (well #3). The system had records indicating the calibration of the well meters on

system, more complaint records should have been available.

During the FRR investigation conducted October 14, 2018, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit to the Abilene Regional Office documentation noting how the system will ensure complaint records are kept in accordance with 30 TAC Chapter 290 by the compliance due date.

Track No: 715729 **Compliance Due Date: 04/16/2020**
30 TAC Chapter 290.46(m)(4)
30 TAC Chapter 290.46(m)(6)

Alleged Violation:
Investigation: 1569974 Comment Date: 05/28/2019

Failure to maintain the pump station and well #3 in working condition.

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. All water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances shall be maintained in a watertight condition and be free of excessive solids.

Pumps, motors, valves, and other mechanical devices shall be maintained in good working condition.

During the CCI conducted April 2, 2019 it was noted the pump station grounds were saturated in water with the grass beginning to overtake the pump station. Empty bottles of chlorine bleach and other mechanical parts were spread out throughout the pump station. The service pump was strapped to the pvc lines to prevent it from blowing them out. All electrical circuits for pump number two were out and the system was noted to have had various electrical issues throughout the month of March 2019. Well #3 was also noted to be down.
Investigation: 1603341 Comment Date: 10/15/2019

Failure to maintain the pump station and well #3 in working condition.

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. All water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances shall be maintained in a watertight condition and be free of excessive solids.

Pumps, motors, valves, and other mechanical devices shall be maintained in good working condition.

During the CCI conducted April 2, 2019 it was noted the pump station grounds were saturated in water with the grass beginning to overtake the pump station. Empty bottles of chlorine bleach and other mechanical parts were spread out throughout the pump station. The service pump was strapped to the pvc lines to prevent it from blowing them out. All electrical circuits for pump number two were out and the system was noted to have had various electrical issues throughout the month of March 2019. Well #3 was also noted to be down.

On May 5, 2019, documentation was submitted to the TCEQ Central and Abilene Regional Offices indicating electrical work had been performed at the pump station, a peristaltic pump to inject chlorine had been installed, a well control system to operate wells off of floats in the storage tanks had been provided, and a cellular autodialer to alert the system when issues

30 TAC Chapter 290.121(b)(1)(B)
30 TAC Chapter 290.121(b)(1)(B)(i)
30 TAC Chapter 290.121(b)(1)(B)(ii)
30 TAC Chapter 290.121(b)(1)(C)
30 TAC Chapter 290.121(b)(1)(C)(i)
30 TAC Chapter 290.121(b)(1)(C)(ii)
30 TAC Chapter 290.121(b)(1)(C)(iii)
30 TAC Chapter 290.121(b)(1)(D)
30 TAC Chapter 290.121(b)(2)
30 TAC Chapter 290.121(b)(2)(A)
30 TAC Chapter 290.121(b)(2)(B)
30 TAC Chapter 290.121(b)(3)
30 TAC Chapter 290.121(b)(5)
30 TAC Chapter 290.121(b)(6)
30 TAC Chapter 290.121(b)(7)
30 TAC Chapter 290.121(b)(8)
30 TAC Chapter 290.121(d)(2)

Alleged Violation:

Investigation: 1568974 Comment Date: 05/23/2019

Failure to have a complete and up-to-date chemical and microbiological monitoring plan.

All public water systems shall maintain an up-to-date chemical and microbiological monitoring plan. Monitoring plans are subject to the review and approval of the executive director. A copy of the monitoring plan must be maintained at each water treatment plant and at a central location.

The monitoring plan shall include information on the location of all required sampling points in the system. Required sampling locations for regulated chemicals are provided in §290.106 of this title (relating to Inorganic Contaminants), §290.107 of this title (relating to Organic Contaminants), §290.108 of this title (relating to Radionuclides Other than Radon), §290.109 of this title (relating to Microbial Contaminants), §290.110 of this title (relating to Disinfectant Residuals), §290.111 of this title (relating to Surface Water Treatment), §290.112 of this title (relating to Total Organic Carbon (TOC)), §290.113 of this title (relating to Stage 1 Disinfection Byproducts (TTHM and HAA5)), §290.114 of this title (relating to Other Disinfection Byproducts (Chlorite and Bromate)), §290.115 of this title (relating to Stage 2 Disinfection Byproducts (TTHM and HAA5)), §290.116 of this title (Relating to Groundwater Corrective Actions and Treatment Techniques), §290.117 of this title (relating to Regulation of Lead and Copper), and §290.118 of this title (relating to Secondary Constituent Levels).

- The location of each sampling site at a treatment plant or pump station must be designated on a plant schematic. The plant schematic must show all water pumps, flow meters, unit processes, chemical feed points, and chemical monitoring points. The plant schematic must also show the origin of any flow stream that is recycled at the treatment plant, any pretreatment that occurs before the recycle stream is returned to the primary treatment process, and the location where the recycle stream is reintroduced to the primary treatment process.
- Each entry point to the distribution system shall be identified in the monitoring plan as follows; a written description of the physical location of each entry point to the distribution system shall be provided; or the location of each entry point shall be indicated clearly on a distribution system or treatment plant schematic.
- The address of each sampling site in the distribution system shall be included in the monitoring plan or the location of each distribution system sampling site shall be designated on a distribution system schematic. The distribution system schematic shall clearly indicate the following: the location of all pump stations in the distribution system; the location of all ground and elevated storage tanks in the distribution system; and the location of all chemical feed points in the distribution system.
- The system must revise its monitoring plan if changes to a plant or distribution system require changes to the sampling locations

The monitoring plan must include a written description of sampling frequency and schedule.

- The monitoring plan must include a list of all routine samples required on a daily, weekly, monthly, quarterly, annual, or less frequent basis and identify the sampling location where the

process, and the location where the recycle stream is reintroduced to the primary treatment process.

- Each entry point to the distribution system shall be identified in the monitoring plan follows: a written description of the physical location of each entry point to the distribution system shall be provided; or the location of each entry point shall be indicated clearly on a distribution system or treatment plant schematic.
- The address of each sampling site in the distribution system shall be included in the monitoring plan or the location of each distribution system sampling site shall be designated on a distribution system schematic. The distribution system schematic shall clearly indicate the following: the location of all pump stations in the distribution system; the location of all ground and elevated storage tanks in the distribution system; and the location of all chemical feed points in the distribution system.
- The system must revise its monitoring plan if changes to a plant or distribution system require changes to the sampling locations.

The monitoring plan must include a written description of sampling frequency and schedule.

- The monitoring plan must include a list of all routine samples required on a daily, weekly, monthly, quarterly, annual, or less frequent basis and identify the sampling location where the samples will be collected.
- The system must maintain a current record of the sampling schedule.

The monitoring plan shall include the public water system's Sample Siting Plan as required by §290.109(d)(1) - (6) of this title. The public water system's Sample Siting Plan shall include a list of all microbial distribution compliance monitoring sites as required by §290.109(d) of this title, including all routine and repeat microbial sample sites. As required by §290.109(d)(2)(G) of this title, a public water system that collects more than the minimum number of required routine microbial samples shall include the additional routine sample sites in the public water system's Sample Siting Plan. In addition, a public water system that is required to collect any associated raw groundwater source(s) compliance samples, as required by §290.109(d)(4) of this title, shall include the microbial raw groundwater well compliance sites in the public water system's Sample Siting Plan. The repeat sample sites, as required by §290.109(d)(3) of this title, shall be associated to their originating routine microbial sample sites. The Sample Siting Plan shall include all groundwater sources and any associated sampling points necessary to meet the requirements of §290.109(d) of this title.

The monitoring plan must identify all laboratory facilities that may be used to analyze samples required by this chapter.

The monitoring plan shall include a written description of the methods used to calculate compliance with all maximum contaminant levels, maximum residual disinfectant levels, and treatment techniques that apply to the system.

The monitoring plan shall include any groundwater source water monitoring plan developed under §290.109(d)(4) of this title to specify well sampling for triggered coliform monitoring.

The monitoring plan shall include any initial distribution system evaluation compliance documentation required by §290.115(c)(5) of this title. The monitoring plan must be revised to show Stage 2 sample sites by the date shown in Figure: 30 TAC §290.115(a)(2) titled "Date to Start Stage 2 compliance."

A public water system that fails to maintain an up-to-date monitoring plan commits a monitoring violation.

During the CCI conducted April 4, 2019, it was noted the system's monitoring plan needed updating and did not include all the required elements. The system was also noted not to have a revised total coliform rule (RTCR) sample siting plan and map.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to have a complete and up-to-date chemical and microbiological monitoring plan.

All public water systems shall maintain an up-to-date chemical and microbiological monitoring

under §290.109(d)(4) of this title to specify well sampling for triggered coliform monitoring.

The monitoring plan shall include any initial distribution system evaluation compliance documentation required by §290.115(c)(5) of this title. The monitoring plan must be revised to show Stage 2 sample sites by the date shown in Figure: 30 TAC §290.115(a)(2) titled "Date to Start Stage 2 compliance."

A public water system that fails to maintain an up-to-date monitoring plan commits a monitoring violation.

During the CCI conducted April 4, 2019, it was noted the system's monitoring plan needed updating and did not include all the required elements. The system was also noted not to have a revised total coliform rule (RTCR) sample siting plan and map.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit a revised monitoring plan to the Abilene Regional Office that is up-to-date and includes all the required components in accordance with 30 TAC Chapter 290 by the compliance due date.

[redacted]

Track No: 698551

30 TAC Chapter 290.46(t)

Alleged Violation:

Investigation: 1530857 Comment Date: 11/19/2018

Failure to have a proper system ownership sign at the production, treatment, and storage facility.

All community water systems shall post a legible sign at each of its production, treatment, and storage facilities. The sign shall be located in plain view of the public and shall provide the name of the water supply and an emergency telephone number where a responsible official can be contacted.

During the complaint investigation conducted on October 4, 2018 it was noted the ownership sign at the pump station located on S Smith Street did not include an emergency telephone number where a responsible official can be contacted.

Investigation: 1569974 Comment Date: 05/23/2019

Failure to have a proper system ownership sign at the production, treatment, and storage facility.

All community water systems shall post a legible sign at each of its production, treatment, and storage facilities. The sign shall be located in plain view of the public and shall provide the name of the water supply and an emergency telephone number where a responsible official can be contacted.

During the complaint investigation conducted on October 4, 2018 it was noted the ownership sign at the pump station located on S Smith Street did not include an emergency telephone number where a responsible official can be contacted.

During the CCI conducted April 2, 2019, it was noted the ownership sign at the pump station located on S Smith Street, the well #4 enclosure, and the well #3 enclosure either did not include an emergency telephone number or did not include a current, reliable phone number where a responsible official can be contacted in the case of an emergency.

Failure to provide a lock to the fence at well #2.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #2 enclosure was left unlocked, with no lock provided.
Investigation: 1569974 Comment Date: 05/23/2019

Failure to provide a lock to the fence at well #4.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #4 enclosure was left unlocked, with no lock provided.

During the CCI conducted April 2, 2019 it was noted no lock had been provided to the gate at the well #4 enclosure. It was additionally noted the well #3 enclosure was also unlocked and had not been provided with a lock.
Investigation: 1603341 Comment Date: 10/15/2019

Failure to provide a lock to the fence at well #2.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #2 (#4) enclosure was left unlocked, with no lock provided.

During the CCI conducted April 2, 2019 it was noted no lock had been provided to the gate at the well #2 (#4) enclosure. It was additionally noted the well #3 enclosure was also unlocked and had not been provided with a lock.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.
Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide a lock to the fence at well #2.

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.

During a complaint investigation conducted on October 18, 2018 it was noted the gate at the well #2 (#4) enclosure was left unlocked, with no lock provided.

During the CCI conducted April 2, 2019 it was noted no lock had been provided to the gate at the well #2 (#4) enclosure. It was additionally noted the well #3 enclosure was also unlocked and had not been provided with a lock.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit photographic documentation to the Abilene Regional Office indicating the gates at wells #4 and #3 have been provided with a lock that is being kept locked in accordance with 30 TAC Chapter 290 by the compliance due date.

During a complaint investigation conducted on December 12, 2018 it was noted the tank overflow connection had a hose attached that was discharging water onto the ground at the pump station near the foundation of the tank. The hose discharge opening was not provided with a cover or a screen. The overflow also had leaking connections.

During the CCI conducted April 2, 2019 it was noted the overflow to the ground storage tanks had not been repaired to meet current AWWWA standards. During the inspection, the opening to the overflow was screened, but nothing else was repaired.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to provide a proper overflow to the ground storage tanks.

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.

During a complaint investigation conducted on December 12, 2018 it was noted the tank overflow connection had a hose attached that was discharging water onto the ground at the pump station near the foundation of the tank. The hose discharge opening was not provided with a cover or a screen. The overflow also had leaking connections.

During the CCI conducted April 2, 2019 it was noted the overflow to the ground storage tanks had not been repaired to meet current AWWWA standards. During the inspection, the opening to the overflow was screened, but nothing else was repaired.

During the FRR investigation conducted October 14, 2019, it was noted no documentation had been submitted to resolve this violation.

Recommended Corrective Action: Please submit photographic documentation to the Abilene Regional Office indicating the tanks at the pump station have been provided with an overflow that is in accordance with current AWWA standards and with 30 TAC Chapter 290 by the compliance due date.

Resolution: Documentation was received in the Abilene Regional Office on December 9, 2019, indicating the system had provided each tank with its own overflow and installed a flapper style check valve at the opening of each overflow. Photographs of the overflows were submitted indicating the overflows were above the surface of the ground. The documentation is adequate to resolve the violation.

Track No: 714975

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 1569171 Comment Date: 05/16/2019

Failure to provide water tight piping in the distribution system.

All water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances shall be maintained in a watertight condition and be free of excessive solids.

During the complaint investigation conducted on March 20 and 22, 2019, leaks were documented at the following locations:

1) The water meter next to the trailer houses in the alley between W. Alley Street and W.

Summary of Investigation Findings

PERRIN WATER SYSTEM Investigation # 1612528

215 S SMITH
PERRIN, JACK COUNTY, TX 76251

Investigation Date: 01/07/2020

Additional ID(s): 1190005

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 698548

30 TAC Chapter 290.110(b)(4)
30 TAC Chapter 290.46(d)
30 TAC Chapter 290.46(d)(2)
30 TAC Chapter 290.46(d)(2)(A)

Alleged Violation:

Investigation: 1530857 Comment Date: 11/19/2018

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 4, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via phone and an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Investigation: 1612528 Comment Date: 01/07/2020

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 4, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via phone and an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 10, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.00 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Investigation: 1612628 Comment Date: 01/07/2020

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 10, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.00 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Recommended Corrective Action: Please submit documentation indicating that the free chlorine residual in the distribution system is at least 0.2 mg/L in accordance with Title 30 Texas Administrative Code (TAC) Chapter 290.

Resolution: This violation is administratively resolved. It was combined with violation 665040 for the court order.

Track No: 699980

30 TAC Chapter 290.110(b)(4)
30 TAC Chapter 290.46(d)
30 TAC Chapter 290.46(d)(2)
30 TAC Chapter 290.46(d)(2)(A)

Alleged Violation:

Investigation: 1532685 Comment Date: 12/07/2018

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on October 18, 2018, it was documented the free chlorine residual tested at two locations within distribution was 0.03 mg/L and 0.02 mg/L. The

Investigation: 1612528 Comment Date: 01/07/2020

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on November 18, 2016, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Recommended Corrective Action: Please submit documentation indicating the free chlorine residual in the distribution system is at least 0.2 mg/L in accordance with Title 30 Texas Administrative Code (TAC) Chapter 290.

Resolution: This violation is administratively resolved. It was combined with violation 685040 for the court order.

Track No: 704070

30 TAC Chapter 290.110(b)(4)
30 TAC Chapter 290.46(d)
30 TAC Chapter 290.46(d)(2)
30 TAC Chapter 290.46(d)(2)(A)

Alleged Violation:

Investigation: 1541042 Comment Date: 01/31/2019

Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

A disinfectant residual must be continuously maintained during the treatment process and throughout the distribution system. The disinfection equipment shall be operated to maintain the following minimum disinfectant residuals in each finished water storage tank and throughout the distribution system at all times: a free chlorine residual of 0.2 milligrams per liter (mg/L)

During a complaint investigation conducted on December 12, 2018, it was documented the free chlorine residual tested at one location within distribution was 0.02 mg/L. The facility was notified via an exit interview via e-mail that documentation demonstrating a compliant residual would need to be submitted within 24 hours. No compliance documentation was received.

This violation is subject to 40 CFR Subpart S-Groundwater Rule regarding significant deficiencies.

Investigation: 1612528 Comment Date: 01/07/2020

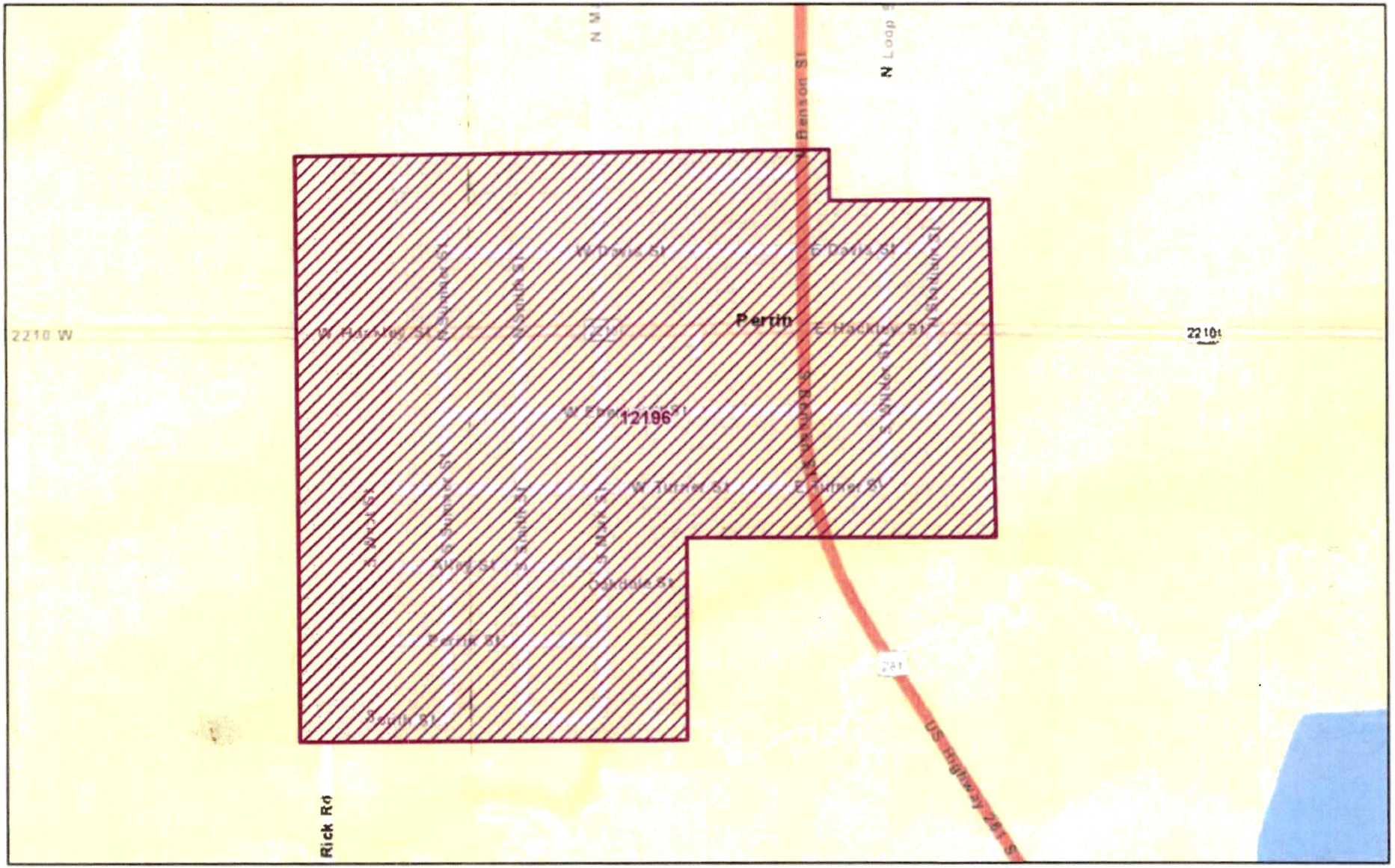
Failure to maintain the required free chlorine residual of 0.2 mg/L throughout distribution at all times.

The residual disinfectant concentration in the water within the distribution system shall be at least 0.2 mg/L free chlorine.

Item 27	Failure to extend the well casing a minimum of 18 inches above the elevation of the finished floor of the pump house or natural ground surface. Agreed Commission Order Docket Number 2017-1541-PWS-E, Violation Tracking # 653546 and 653567. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.
Item 28	Failure to meet current American Water Works Association (AWWA) design and construction standards on the three ground storage tanks. Agreed Commission Order Docket Number 2017-1541-PWS-E, Violation Tracking # 653546 and 653567. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.
Item 29	Failure to maintain a free chlorine residual of 0.2 mg/L throughout the distribution system at all times. Final Default Judgment and Permanent Injunction Cause No. D-1-GN-18-005908, IV. Permanent Injunction, B.1 requires a minimum free chlorine residual of 0.2 mg/L be maintained in the distribution system. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.
Item 28	Failure to provide a minimum well capacity of 0.6 gallons per minute (gpm) per connection. Agreed Commission Order Docket Number 2017-1541-PWS-E, Violation Tracking # 653568. During the FRR investigation conducted January 7, 2020, it was noted no documentation had been submitted to resolve this violation.

Perrin CCN Map

attachment j



May 5, 2020

1:9,028

0 0.05 0.1 0.2 mi

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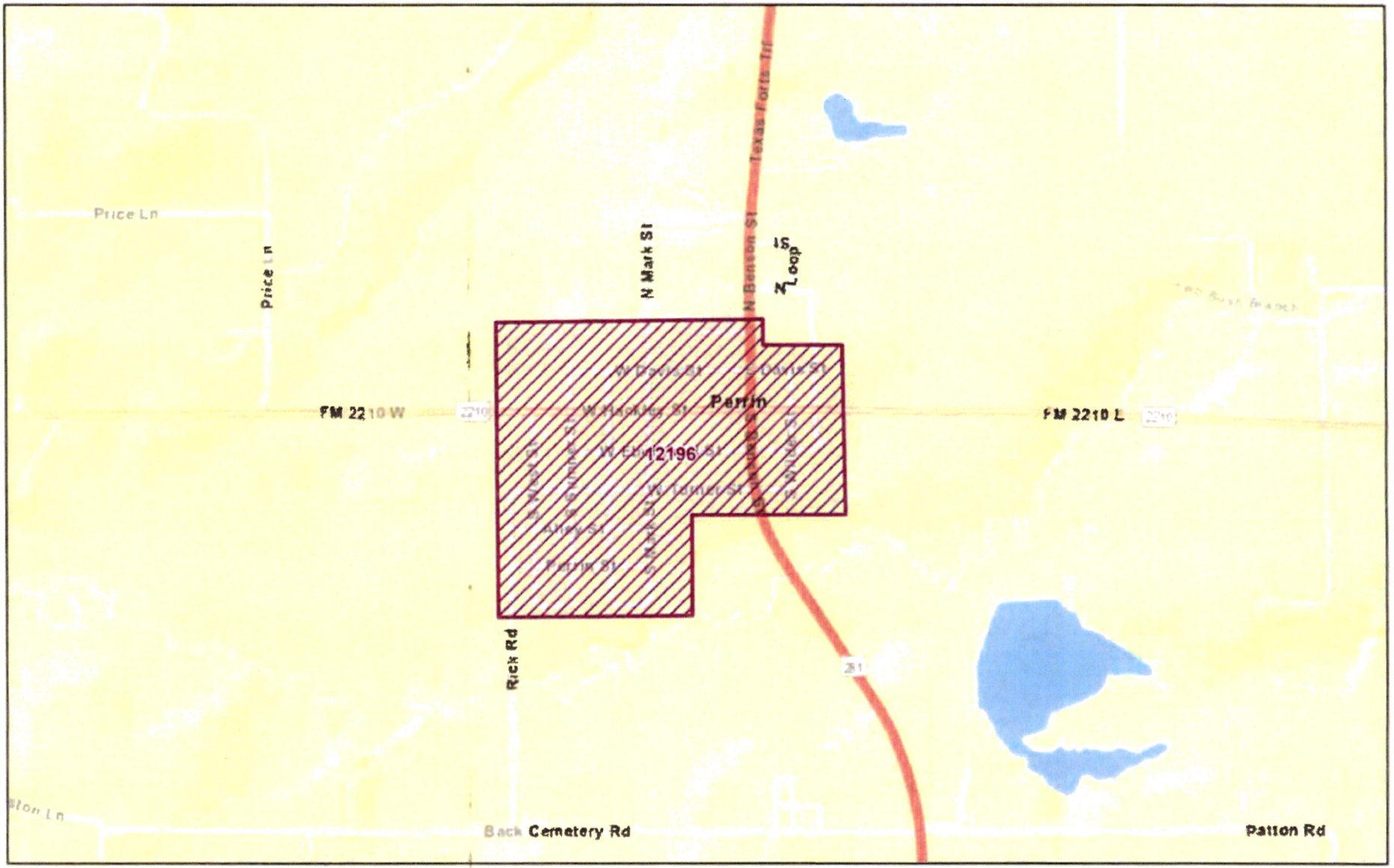
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan,

Perrin CCN Map

attachment K



May 5, 2020

1:18,056

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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan,