

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 2, 2021

Via Certified Mail, Return Receipt Requested

Article Number 7021 0350 0000 4630 5538  
Odis Lowe, Registered Agent  
RCH WATER SUPPLY CORPORATION  
5763 SH 205 South  
Rockwall, Texas 75032

Article Number 7021 0350 0000 4630 6351  
Jack Pullen, President  
RCH WATER SUPPLY CORPORATION  
P.O. Box 2034  
Rockwall, Texas 75087-4434

Re: RCH WATER SUPPLY CORPORATION; RN102689635;  
TCEQ Docket No. 2021-0601-PWS-E

Dear Messrs. Lowe and Pullen:

The Executive Director of the Texas Commission on Environmental Quality ("Commission" or "TCEQ") is pursuing an enforcement action against you for violations of state statutes and Commission Rules. Enclosed is a copy of the "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of RCH WATER SUPPLY CORPORATION" (the "EDPRP"), which was filed today with the Chief Clerk of the TCEQ.

**You may employ an attorney. If you or your attorney do not file a written answer with the Chief Clerk of the TCEQ within twenty days after you receive this notice and petition, and/or fail to settle this matter by entering into an Agreed Order, the Commission may issue a default order against you.** If a default order is issued, you will be required to pay the assessed penalty and complete any corrective actions recommended by the Executive Director.

**YOUR FAILURE TO ACCEPT OR PICK UP CERTIFIED MAIL WILL NOT RELIEVE YOU OF YOUR RESPONSIBILITY IN THIS MATTER.**

To request a hearing, send a written hearing request referencing TCEQ Docket No. 2021-0601-PWS-E to the persons listed below via e-mail, regular mail, fax, or e-filing:

Laurie Gharis, Chief Clerk  
Office of the Chief Clerk  
Texas Commission on Environmental Quality  
P.O. Box 13087, MC 105  
Austin, Texas 78711-3087  
(512) 239-3311 (fax)  
<https://www14.tceq.texas.gov/epic/eFiling/>

P.O. Box 13087 · Austin, Texas 78711-3087 · 512-239-1000 · [tceq.texas.gov](http://tceq.texas.gov)

How is our customer service? [tceq.texas.gov/goto/customersurvey](http://tceq.texas.gov/goto/customersurvey)  
printed on recycled paper

and:

Judy Bohr, Staff Attorney  
Office of Legal Services, Litigation  
Texas Commission on Environmental Quality  
P.O. Box 13087, MC 175  
Austin, Texas 78711-3087  
(512) 239-3434 (fax)  
[Judy.Bohr@tceq.texas.gov](mailto:Judy.Bohr@tceq.texas.gov)

and:

Garrett Arthur, Staff Attorney  
Office of Public Interest Counsel  
Texas Commission on Environmental Quality  
P.O. Box 13087, MC 103  
Austin, Texas 78711-3087  
(512) 239-6377 (fax)  
[garrett.arthur@tceq.texas.gov](mailto:garrett.arthur@tceq.texas.gov)

To e-file your hearing request, go to <https://www14.tceq.texas.gov/epic/eFiling/> and follow the on-screen instructions. Hearing requests are due to the Chief Clerk by 5:00 p.m. CST on or before the 20-day deadline date referenced above. Hearing requests filed via e-filing must be in either Microsoft Word or Adobe Acrobat (pdf) format.

All or a portion of the recommended administrative penalty may be offset through the completion of or payment to a Supplemental Environmental Project ("SEP"), which directs all or a portion of your administrative penalty toward projects aimed at improving the environment. For further information on contributing to a SEP, please visit our website at <https://www.tceq.texas.gov/compliance/enforcement/sep>.

For further information concerning the enforcement process, contact the TCEQ Office of Public Interest Counsel at (512) 239-6363. For information concerning compliance assistance, contact the TCEQ Environmental Assistance Division at (800) 447-2827.

If you have any questions or would like to schedule a meeting to discuss settlement, payment plan options, or contribution to a SEP, please contact me at (512) 239-3400 or at my e-mail address listed below. I look forward to cooperatively resolving this matter with you.

Sincerely,



Judy Bohr, Staff Attorney  
Office of Legal Services, Litigation  
Texas Commission on Environmental Quality  
[Judy.Bohr@tceq.texas.gov](mailto:Judy.Bohr@tceq.texas.gov)

Enclosure

cc:

Ecko Beggs, Enforcement  
Brent Candler, Dallas/Fort Worth Regional Office  
Garrett Arthur, TCEQ Office of Public Interest Counsel  
Art Rodriguez, Attorney for Respondent, Russell, Rodriguez, Hyde & Bullock, LLP  
[arodriguez@txlocalgovlaw.com](mailto:arodriguez@txlocalgovlaw.com)

**TCEQ DOCKET NO. 2021-0601-PWS-E**

<b>IN THE MATTER OF AN ENFORCEMENT ACTION AGAINST RCH WATER SUPPLY CORPORATION; RN102689635</b>	<b>§ § § § §</b>	<b>BEFORE THE  TEXAS COMMISSION ON  ENVIRONMENTAL QUALITY</b>
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**EXECUTIVE DIRECTOR’S PRELIMINARY REPORT AND PETITION  
RECOMMENDING THAT  
THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
ENTER AN ENFORCEMENT ORDER ASSESSING AN ADMINISTRATIVE PENALTY AGAINST  
AND REQUIRING CERTAIN ACTIONS OF  
RCH WATER SUPPLY CORPORATION**

**INTRODUCTION**

1. The Executive Director of the Texas Commission on Environmental Quality (“Commission” or “TCEQ”), by and through a representative of the Litigation Division, hereby issues this Preliminary Report and Petition pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and 30 TEX. ADMIN. CODE chs. 70 and 290. Discovery related to this matter is intended to be conducted under Level 3 pursuant to TEX. R. CIV. P. 190.
2. RCH WATER SUPPLY CORPORATION (“Respondent”) is subject to the enforcement authority of the Commission pursuant to TEX. WATER CODE § 7.002 and TEX. HEALTH & SAFETY CODE § 341.049 because the violations alleged herein are within the Commission’s general jurisdiction, pursuant to TEX. WATER CODE § 5.013, as they involve violations of the state’s public water supply program.
3. The Executive Director has come to the conclusion that Respondent violated 30 TEX. ADMIN. CODE § 290.44(h)(1)(A). The Executive Director recommends that the Commission enter an order assessing an administrative penalty against Respondent in the amount of three thousand one hundred fifty dollars (\$3,150.00). Further, the Executive Director recommends that the Commission order Respondent to undertake such actions as are necessary to bring operations into compliance with the Texas Health and Safety Code and TCEQ rules.
4. Effective September 1, 2006, the TCEQ does not issue, amend, or renew permits, registrations, certifications, or licenses to an entity or person if any delinquent penalties or delinquent fees are associated with that entity’s/person’s 9-digit TCEQ Customer Number (CN), regardless of media and/or facility location.

**FACTS SUPPORTING VIOLATIONS**

5. Respondent owns and operates a public water supply located approximately 0.25 mile south of State Highway 205 on Lofland Circle in Rockwall, Rockwall County, Texas (the “Facility”). The Facility provides water for human consumption, has approximately 2,289 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(71).
6. During an investigation conducted on March 12, 2021, an investigator documented that Respondent failed to ensure additional protection was provided at all residences or establishments where an actual or potential contamination hazard exists in the form of an air gap or backflow prevention assembly (“BPA”), as identified in 30 TEX. ADMIN. CODE § 290.47(f), in violation of 30 TEX. ADMIN. CODE § 290.44(h)(1)(A). Specifically,

Respondent did not ensure that additional protection was provided at connections served by on-site sewage facilities where irrigation systems were installed.

#### IMPOSITION OF PENALTY

7. Based on the facts supporting the violations, the Executive Director recommends that an administrative penalty be imposed pursuant to TEX. HEALTH & SAFETY CODE § 341.049. The Commission has the authority to assess an administrative penalty up to \$5,000.00 for each day of each violation under TEX. HEALTH & SAFETY CODE § 341.049.

#### AMOUNT OF PENALTY

8. In determining the amount of the penalty, the Commission is required by TEX. HEALTH & SAFETY CODE § 341.049 to consider:
  - a. The nature of the circumstances and the extent, duration and gravity of the prohibited acts or omissions;
  - b. With respect to the alleged violator:
    - i. the history and extent of previous violations;
    - ii. the degree of culpability, including whether the violation was attributable to mechanical or electrical failures and whether the violation could have been reasonably anticipated and avoided;
    - iii. the person's demonstrated good faith, including actions taken by the person to correct the cause of the violation;
    - iv. any economic benefit gained through the violation; and
    - v. the amount necessary to deter future violations; and
  - c. Any other matters that justice may require.
9. Based on the facts supporting the violations, and having considered the above-described factors, the Executive Director recommends that Respondent be required to pay an administrative penalty in the amount of three thousand one hundred fifty dollars (\$3,150.00).
10. The penalty calculation worksheet ("PCW") for the recommended administrative penalty is attached hereto and incorporated herein by reference ("Attachment A"). The PCW sets forth each alleged violation and the statutory factors the Executive Director considered in determining the recommended administrative penalty.
11. The Executive Director followed an established Penalty Policy approved by the Commission in calculating the penalty in this enforcement action. *See* Texas Commission on Environmental Quality Penalty Policy (January 28, 2021).

#### CORRECTIVE ACTION ORDERING PROVISIONS

12. Pursuant to TEX. HEALTH & SAFETY CODE ch. 341, the Commission shall ensure that public drinking water supply systems supply safe drinking water and are technically sound.
13. The Executive Director recommends that Respondent be required to implement the following corrective measures:
  - a. Within 30 days after the effective date of this Order, ensure that a proper BPA or air gap is provided at all locations where an actual or potential contamination hazard exists, including but not limited to a reduced pressure principle backflow

prevention assembly at connections served by on-site sewage facilities where irrigation systems were installed, in accordance with 30 TEX. ADMIN. CODE § 290.44.

- b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 13.a. The certification shall be signed by Respondent and shall include the following certification language:

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

Respondent shall submit the written certification and copies of documentation necessary to demonstrate compliance with these Corrective Action Ordering Provisions to:

Order Compliance Team  
Enforcement Division, MC 149A  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

and:

Water Section Manager  
Dallas/Fort Worth Regional Office  
Texas Commission on Environmental Quality  
2309 Gravel Drive  
Fort Worth, Texas 76118-6951

#### **RESPONDENT'S RIGHTS AND RESPONSIBILITIES**

14. According to TEX. HEALTH & SAFETY CODE § 341.049 and the TCEQ's procedural rules, Respondent has a right to a hearing on the occurrence of the violations, the amount of the proposed penalty, or both. To preserve this right to a hearing, within 20 days after the day Respondent receives this Preliminary Report and Petition, Respondent must submit a written response to the Executive Director in accordance with TEX. HEALTH & SAFETY CODE § 341.049 and 30 TEX. ADMIN. CODE § 70.105(a).

**PRAYER**

15. ACCORDINGLY, the Executive Director respectfully requests that the Commission enter an order, pursuant to TEX. HEALTH & SAFETY CODE ch. 341, assessing a penalty and granting other relief as requested above, together with any other relief the Commission finds appropriate.

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker  
Executive Director

Erin E. Chancellor, Director  
Office of Legal Services

Charmaine K. Backens, Deputy Director  
Litigation Division



by \_\_\_\_\_  
Judy Bohr  
State Bar of Texas No. 24092153  
TCEQ Office of Legal Services  
Litigation Division, MC 175  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-3400  
(512) 239-3434 (FAX)  
[Judy.Bohr@tceq.texas.gov](mailto:Judy.Bohr@tceq.texas.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of December, 2021, the original of the foregoing "Executive Director's Preliminary Report and Petition Recommending that the Texas Commission on Environmental Quality Enter an Enforcement Order Assessing an Administrative Penalty Against and Requiring Certain Actions of RCH WATER SUPPLY CORPORATION" ("EDPRP") was filed with the Chief Clerk, Texas Commission on Environmental Quality, Austin, Texas.

I further certify that on this day a true and correct copy of the foregoing EDPRP was mailed via Certified Mail, Return Receipt Requested, postage prepaid, to:

Odis Lowe  
5763 SH 205 South  
Rockwall, Texas 75032  
Article Number 7021 0350 0000 4630 5538

Jack Pullen  
P.O. Box 2034  
Rockwall, Texas 75087-4434  
Article Number 7021 0350 0000 4630 6351

I further certify that on this day a true and correct copy of the foregoing EDPRP was mailed via electronic mail to:

Art Rodriguez  
Attorney for Respondent  
Russell, Rodriguez, Hyde & Bullock, LLP  
[arodriguez@txlocalgovlaw.com](mailto:arodriguez@txlocalgovlaw.com)

I further certify that on this day a true and correct copy of the foregoing EDPRP was electronically delivered to Garrett Arthur, TCEQ Office of Public Interest Counsel, at [garrett.arthur@tceq.texas.gov](mailto:garrett.arthur@tceq.texas.gov).



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Judy Bohr, Staff Attorney  
Office of Legal Services, Litigation  
Texas Commission on Environmental Quality

**ATTACHMENT A**  
**PENALTY CALCULATION WORKSHEET**





# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

<b>DATES</b>	<b>Assigned</b>	26-Apr-2021	<b>Screening</b>	28-Apr-2021	<b>EPA Due</b>	
	<b>PCW</b>	1-Sep-2021				

<b>RESPONDENT/FACILITY INFORMATION</b>	
<b>Respondent</b>	RCH WATER SUPPLY CORPORATION
<b>Reg. Ent. Ref. No.</b>	RN102689635
<b>Facility/Site Region</b>	4-Dallas/Fort Worth
<b>Major/Minor Source</b>	Major

<b>CASE INFORMATION</b>			
<b>Enf./Case ID No.</b>	60689	<b>No. of Violations</b>	1
<b>Docket No.</b>	2021-0601-PWS-E	<b>Order Type</b>	1660
<b>Media Program(s)</b>	Public Water Supply	<b>Government/Non-Profit</b>	Yes
<b>Multi-Media</b>		<b>Enf. Coordinator</b>	Ecko Beggs
		<b>EC's Team</b>	Enforcement Team 2
<b>Admin. Penalty \$ Limit Minimum</b>	\$50	<b>Maximum</b>	\$5,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>	<b>Subtotal 1</b>	\$3,000
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### ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

<b>Compliance History</b>	5.0% Adjustment	<b>Subtotals 2, 3, &amp; 7</b>	\$150
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<b>Notes</b>	Enhancement for one NOV with the same/similar violations.
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<b>Culpability</b>	No	0.0% Enhancement	<b>Subtotal 4</b>	\$0
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<b>Notes</b>	The Respondent does not meet the culpability criteria.
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<b>Good Faith Effort to Comply Total Adjustments</b>	<b>Subtotal 5</b>	\$0
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<b>Economic Benefit</b>	0.0% Enhancement*	<b>Subtotal 6</b>	\$0
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Total EB Amounts	\$100	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$1,000	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$3,150
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	0.0%	<b>Adjustment</b>	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

<b>Notes</b>	
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<b>Final Penalty Amount</b>	\$3,150
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$3,150
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<b>DEFERRAL</b>	0.0%	Reduction	<b>Adjustment</b>	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

<b>Notes</b>	Deferral not offered for non-expedited settlement.
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<b>PAYABLE PENALTY</b>	\$3,150
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Screening Date 28-Apr-2021

Docket No. 2021-0601-PWS-E

PCW

Respondent RCH WATER SUPPLY CORPORATION

Policy Revision 5 (January 28, 2021)

Case ID No. 60689

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN102689635

Media Public Water Supply

Enf. Coordinator Ecko Beggs

### Compliance History Worksheet

#### >> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	1	5%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events ( <i>number of events</i> )	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

**Adjustment Percentage (Subtotal 2)** 5%

#### >> Repeat Violator (Subtotal 3)

N/A

**Adjustment Percentage (Subtotal 3)** 0%

#### >> Compliance History Person Classification (Subtotal 7)

N/A

**Adjustment Percentage (Subtotal 7)** 0%

#### >> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with the same/similar violations.

**Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)** 5%

#### >> Final Compliance History Adjustment

**Final Adjustment Percentage \*capped at 100%** 5%

Screening Date 28-Apr-2021

Docket No. 2021-0601-PWS-E

PCW

Respondent RCH WATER SUPPLY CORPORATION

Policy Revision 5 (January 28, 2021)

Case ID No. 60689

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN102689635

Media Public Water Supply

Enf. Coordinator Ecko Beggs

Violation Number 1

Rule Cite(s)

30 Tex. Admin. Code § 290.44(h)(1)(A)

Violation Description

Failed to ensure additional protection was provided at all residences or establishments where an actual or potential contamination hazard exists in the form of an air gap or backflow prevention assembly, as identified in 30 Tex. Admin. Code § 290.47(f). Specifically, the Respondent did not ensure that additional protection was provided at connections served by on-site sewage facilities where irrigation systems were installed.

Base Penalty \$5,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential	x		

Percent 30.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Failure to have additional protections may allow backflow and siphonage to occur resulting in persons served by the Facility being exposed to contaminants which would exceed levels protective of human health.

Adjustment \$3,500

\$1,500

Violation Events

Number of Violation Events 2

47 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$3,000

Two monthly events are recommended, calculated from the March 12, 2021 record review date to the April 28, 2021 screening date.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary		
Ordinary		
N/A	x	

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$3,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$95

Violation Final Penalty Total \$3,150

This violation Final Assessed Penalty (adjusted for limits) \$3,150

## Economic Benefit Worksheet

**Respondent** RCH WATER SUPPLY CORPORATION  
**Case ID No.** 60689  
**Reg. Ent. Reference No.** RN102689635  
**Media** Public Water Supply  
**Violation No.** 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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### Delayed Costs

Equipment	\$1,000	20-Aug-2020	2-Dec-2021	1.28	\$4	\$86	\$90
Buildings				0.00	\$0	\$0	\$5
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

**Notes for DELAYED costs**

The delayed cost includes the estimated amount to ensure additional protection is provided in the form of a reduced pressure principle backflow prevention assembly, calculated from the date of the investigation initially documenting the violation to the estimated date of compliance.

### Avoided Costs

**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

**Notes for AVOIDED costs**

Approx. Cost of Compliance

\$1,000

**TOTAL**

\$95