

# Texas Commission on Environmental Quality Investigation Report

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**Customer: Roman Forest Public Utility District 3**  
**Customer Number: CN600656540**

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**Regulated Entity Name: ROMAN FOREST PUD 3**

**Regulated Entity Number: RN101455566**

**Investigation #** 1473478

**Investigator:** JOSEPHINE GARCIA

**Conducted:** 02/23/2018 -- 02/23/2018

**Program(s):** PUBLIC WATER SYSTEM/SUPPLY

**Investigation Type:** Compliance Investigation

**Additional ID(s):** 1700238

**Address:** ,  
, ,

**Incident Numbers**

**Site Classification** GW <=50 CONNECTION

**No Industry Code Assigned**

**Location:** EAST OF HWY 59N OFF ROMAN FOREST  
BLVD  
KEY MAP 258A

**Local Unit:** REGION 12 - HOUSTON

**Activity Type(s):** PWSCCIGWCM - CCI GW PURCHASE  
- COMMUNITY MANDATORY

**Principal(s):**

Role	Name
RESPONDENT	ROMAN FOREST PUD 3

**Contact(s):**

Role	Title	Name	Phone
REGULATED ENTITY MAIL CONTACT	PRESIDENT	MS RUTH A RAWLINS	Phone (832) 659-2150
REGULATED ENTITY CONTACT	PRESIDENT	MS RUTH A RAWLINS	Phone (832) 659-2150
PARTICIPATED IN	OPERATOR	MR JEREMY H COCHRAN	Work (832) 995-7470
NOTIFIED	OPERATOR	MR JEREMY H COCHRAN	Work (832) 995-7470

**Other Staff Member(s):**

Role	Name
Supervisor	NICHOLE NUNES
Investigator	CHIKA OKOLO
QA Reviewer	MAYTHAM FARIS
Investigator	MARIOL GEFERS
Supervisor	LATRICHIA SPIKES

### Associated Check List

**Checklist Name**

PWS INVESTIGATION - EQUIPMENT  
MONITORING AND SAMPLING revised 06/2013  
PWS STANDARD FIELD

**Unit Name**

EQUIPMENT  
INVESTIGATION

**Investigation Comments:**

**INTRODUCTION**

A Comprehensive Compliance Investigation (CCI) was conducted at Roman Forest Public Utility District (PUD) 3, Public Water Supply (PWS) ID 1700238, on February 23, 2018, by Texas Commission on Environmental Quality (TCEQ) Environmental Investigators (EIs) Josephine Garcia and Chika Okolo, to determine compliance with applicable PWS regulations. The CCI was coordinated with Mr. Jeremy Cochran, President and Operator for H2OMC, LLC, on February 7, 2018 via telephone.

The investigation was conducted with Mr. Cochran. The operating company is H2OMC, LLC.

The TCEQ Exit Interview Form was conducted with and emailed to Mr. Cochran on March 1, 2018 (Attachment 1).

The investigation included the examination of records, and an on-site investigation of all physical facilities that pertain to the public water supply (PWS) system. More specifically, the investigation inspection included the water source, water treatment; water distribution; monitoring/reporting/data verification; water system management/operations; and operator compliance with TCEQ requirements.

A Notice of Violation letter was mailed to the water system. A detailed description of the violations listed in the exit interview form are listed in the Alleged Violation section of the Summary of Investigation Findings.

**GENERAL FACILITY AND PROCESS INFORMATION**

Roman Forest PUD 3 is a community PWS. This system serves 11 active connections with a total of 11 connections and an estimated population of 33. The population data was provided by the operator.

A distribution only system is a PWS that has no treatment facilities or a water plant. Distribution only systems purchase water from a wholesaler. Roman Forest PUD 3 receives treated and pressurized water directly into its distribution system from an interconnect that is supplied by Roman Forest Consolidated MUD, Source ID. No. 1700071. For additional facility information see the Water System Schematic and Drinking Water Watch (DWW) Summary Sheet (Attachments 2 and 3).

The water system employs the following operator for Roman Forest PUD 3:

Mr. Jeremy Cochran has an A – ground water license, license number WO0016722, which expires on October 15, 2019.

The operator has the appropriate level of certification for the system.

Exceptions:

The water system has not been granted any regulatory exceptions.

Emergency Preparedness Plan:

Regulated entities located in Montgomery County are not required to submit an Emergency Preparedness Plan (EPP) at this time.

Chemical Analysis:

The system is in compliance with all primary and secondary standards.

Interconnects:

**ROMAN FOREST PUD 3 -****2/23/2018 Inv. # - 1473478****Page 3 of 4**

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Roman Forest PUD 3 has a purchase interconnect (I/C) with Roman Forest Consolidated MUD, PWS no. 1700071.

Roman Forest PUD 3 is a purchase water facility and has a contract with Roman Forest Consolidated MUD. Roman Forest PUD 3 was unable to provide the contract at the time of the investigation. This is addressed in the Alleged Violation Section of the Summary of Investigation Findings.

See below for the multiple system capacity calculations.

Roman Forest Consolidated MUD	672 connections (conn)
Roman Forest PUD #3	11 conn
Roman Forest PUD #4	11 conn
Total	694 conn

	Required	Provided
Well	0.6 gal/conn X 694 conn	416.4 gpm 850 gpm
Pressure Tank	20 gal/conn X 694 conn	0.01388 MG 0.03 MG
Ground Storage Tank	200cal/conn X 694 conn	0.13880 MG 0.337 MG
Service Pump	2.0 gpm/conn X 694 conn	1388 gpm 1500 gpm

Roman Forest Consolidated MUD has sufficient capacity to supply Roman Forest PUD #3 and PUD #4.

**Field Monitoring Activities:**

The free chlorine residual concentration is required to be greater than or equal to 0.2 milligrams per liter (mg/L) (30 TAC §290.110(b)(4)) and the pressure is required to be greater than or equal to 35 pounds per square inch (psi) (30 TAC §290.46(r)) within the distribution system.

At the time of the field investigation, the disinfectant residual concentration and distribution pressure were monitored at a hydrant located on Fairway Drive. The location had a 0.90 mg/L free chlorine residual concentration and a pressure of 45 psi. The pressure and chlorine reading were compliant.

**BACKGROUND**

The previous CCI was conducted on July 11, 2014 through August 4, 2014, and no violations were noted at the time of the investigation.

Roman Forest PUD 3 has not had a complaint investigation within the five years preceding this investigation.

**ADDITIONAL INFORMATION**

During the investigation, two violations were cited as a result of the investigation. For details, see Summary of Investigation Findings.

<b>NOV Date</b>	09/11/2018	<b>Method</b>	WRITTEN
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**OUTSTANDING ALLEGED VIOLATION(S)****ASSOCIATED TO A NOTICE OF VIOLATION**

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**Track Number:** 686642**Compliance Due Date:** 10/11/2018**Violation Start Date:** Unknown**30 TAC Chapter 290.46(s)****Alleged Violation:****Investigation:** 1473478

Comment Date: 08/06/2018

Failure to make chemical disinfectant residual analyzer available for review.

At the time of the investigation, the regulated entity failed to provide the handheld, manual colorimeter, manual colorimeter secondary analyzer and calibrations per 30 Tex. Admin. Code §290.46(s)(2)(C)(i).

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

Track Number: 686647

Compliance Due Date: 12/10/2018

Violation Start Date: Unknown

30 TAC Chapter 290.45(f)(1)

**Alleged Violation:**

**Investigation: 1473478**

Comment Date: 08/06/2018

Failure to secure a written contract, a signed document of specific terms, or a memorandum or letter of understanding between the purchaser and wholesaler which authorizes the purchase of water at a rate sufficient to meet these requirements.

At the time of the investigation, the regulated entity failed to provide a copy of the purchase water contract per 30 Tex. Admin. Code §290.45(f)(1).

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

Signed

  
Environmental Investigator

Date

9/11/2018

Signed

  
Supervisor

Date

9/11/18

**Attachments: (in order of final report submittal)**

\_\_\_ Enforcement Action Request (EAR)

\_\_\_ Maps, Plans, Sketches

✓ Letter to Facility (specify type) : NAI

\_\_\_ Photographs

\_\_\_ Investigation Report

\_\_\_ Correspondence from the facility

\_\_\_ Sample Analysis Results

✓ Other (specify) :

\_\_\_ Manifests

See list of attachments

\_\_\_ Notice of Registration

## Summary of Investigation Findings

ROMAN FOREST PUD 3

Investigation #

1473478

Investigation Date: 02/23/2018

, MONTGOMERY COUNTY,

Additional ID(s): 1700238

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

Track No: 686642 Compliance Due Date: 10/11/2018

30 TAC Chapter 290.46(s)

**Alleged Violation:**

Investigation: 1473478

Comment Date: 08/06/2018

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 11, 2018

**CERTIFIED MAIL # 91 7199 9991 7038 7380 9090**  
**ELECTRONIC RECEIPT REQUESTED**

Ms. Ruth Ann Rawlins  
President  
Roman Forest PUD 3  
1018 Fairway Drive  
New Caney, Texas 77357-3321

Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Roman Forest Public Utility District 3, 2707 North Colosseum, New Caney, Montgomery,  
Texas  
Regulated Entity No.: 101455566  
TCEQ ID No.: 1700238 Investigation No.: 1473478

Dear Ms. Rawlins:

On February 23, 2018, Ms. Josephine Garcia and Mr. Chika Okolo of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for Public Water Supply. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office within the compliance due date listed on the Summary of Investigation Findings enclosure, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled Obtaining TCEQ Rules (GI 032) are located on our agency website at <http://www.tceq.texas.gov> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Houston Region Office at (713) 767-3650 or the Central Office Publications Ordering Team at (512) 239-0028.

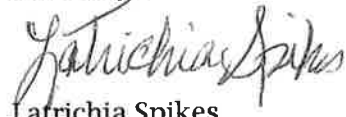
The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the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

Ms. Rawlins, President  
Page 2  
September 11, 2018

Office within 10 days from the date of this letter. At that time, PWS Team Leader Ms. Latrichia Spikes, will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Josephine Garcia in the Houston Region Office at (713) 767-3776.

Sincerely,



Latrichia Spikes  
Team Leader  
Public Water Supply  
Houston Region Office

LS/JG/tj

cc:

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

Jeremy Cochran, Operator of H2OMC, LLC, PO Box 1586, Huffman, Texas 77336-1586

Enclosure: Summary of Investigation Findings

Roman Forest Public Utility District (PUD) 3  
RN: 101455566, PWS ID #: 1700238  
Investigation No.: 1473478  
Investigation Type: Comprehensive Compliance Investigation (CCI)

#### LIST OF ATTACHMENTS

1. TCEQ Exit Interview Form
2. Water System Schematic
3. Drinking Water Watch (DWW) Summary Sheet



# Attachment 1

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

Regulated Entity/Site Name	Roman Forest PUD 3			TCEQ Add. ID No. RN No. (optional)	1700238
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	CCI
Regulated Entity Contact	Jeremy Cochran			Telephone No.	
Title				Fax No.	
				Date Contacted	
				Date Faxed	

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

Issue		<b>For Records Request: identify the necessary records, the company contact and date due to the agency.</b> <b>For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully describe.</b>	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
1	PV		Submit a photograph of the chlorine kit
2	PV		Submit a photograph of the standard kit
3	RR		Submit a copy of the chlorine meter calibration records
4	RR		Submit copy of purchase agreement.

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

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

<b>Document Acknowledgment.</b> Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.			
Josephine Garcia	3/10/2018		
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date

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

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512-239-3282.

## Attachment 2

## PWS - SYSTEM FLOW DIAGRAM

Name of System:	Roman Forest PUD #3	Additional ID:	1700238
Investigation No.:	1473478	Investigation Date:	02/23/2018
<p style="text-align: center;">Description of Sources, Treatment, Entry Points and Distribution</p> <p>Labeling: Owner's source names and TCEQ water source code designation, types of treatment and chemicals, entry points to distribution, entry point sample taps, booster disinfection, distribution connections and layout (if possible).</p>			

Location: 59 North and Roman Forest Boulevard



Open I/C with  
Roman Forest Consolidated MUD  
ID 1700071



Roman Forest PUD #3  
Community  
Distribution Only  
Connections: 11  
Population: 33

## Attachment 3

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

08/06/2018

Texas Commission on Environmental Quality

11:08:46

DWW Water System Summary Sheet

PWS ID	PWS Name	Central Registry RN
TX1700238	ROMAN FOREST PUD 3	RN101455566

Organization/Customer *	Central Registry CN
ROMAN FOREST PUD 3	CN600656540

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

All Water System Contacts			
Type	Contact	Communication	
AC - Administrative Contact - PRESIDENT	RAWLINS, RUTH ANN 1018 FAIRWAY DR NEW CANEY, TX 77357-3321	Phone Type	Value
		MOB - Mobile	832-659-2150
EC - Emergency Contact - OPERATOR	COCHRAN, JEREMY, H PO BOX 1586 HUFFMAN, TX 77336-1586	Phone Type	Value
		MOB - Mobile	832-995-7470
FC - Financial Contact	SAN JACINTO TAX SERVICE CO 103 KERRY RD HIGHLANDS, TX 77562-3801	Phone Type	Value
		BUS - Business	281-426-8156
		FAX - Facsimile	281-426-4597
OW - Owner	ROMAN FOREST PUD 3 PO BOX 783 CROSBY, TX 77532-0784		
PWS - Public Water System Contact - OPERATOR	COCHRAN, JEREMY, H PO BOX 1586 HUFFMAN, TX 77336-1586	Phone Type	Value
		MOB - Mobile	832-995-7470

Operator Grade	Number
GROUND WATER TREATMENT OPERATOR Grade B	1

Water Operator Licenses		
License Holder:	HUDSON, JOHN C	
CURRENT	Class: B - GROUND WATER TREATMENT OPERATOR	WG0007668
License Holder:	JOHN HUDSON & COMPANY INC	
EXPIRED	Class: NONE - WATER OPERATIONS COMPANY	WC0000125

*Current Jeremy Cochran, Class A-Ground Water W00016722*

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

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

Population Type	Population Served	# of Connect	# I/C w/other PWS
Residential	33	11	0

Total Product (MGD)	Average Daily Consump.	Max Daily Demand (MGD)	Total Storage (MG)	Elev. Storage (MG)	Service Pump Cap.	Max.Purchase Cap. (MGD/GPM)	Pressure Tank Cap. (MG)

Activity Status	Inactivation Date
A - ACTIVE	

Last Survey Date	Surveyor	Survey Type	Region	County
08/04/2014	PATRICIA BLACKWELL	Sanitary Survey	HOUSTON	MONTGOMERY
03/10/2011	DAVID, W LIVINGS	Sanitary Survey	HOUSTON	MONTGOMERY
07/18/2008	DESHAUNE, E BLAKE	Sanitary Survey	HOUSTON	MONTGOMERY

*2/23/2018 Josephine Gracian Sanitary Survey Houston Montgomery*

(Treatment Plant)							
Entry Point			Plant Num	Chemical Mon Type		Distribution Mon Type	

	EP Name/Source Summation (Activity Status)	Plant Name (Activity Status)			Chem Sample Point		Dist Sample Point
EP001	TRT-TAP / Purchased Ground Water(A)	ROMAN FOREST PUD 3(I)	TP18389		NO		NO

Train:	No Train Data			
(Treatments)				
Disinfection Zone	Treatment Sequence	Objective	Process	Treatment

(Active Sources)						
Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
P1700238A	GW FROM ROMAN FOREST CONSOLIDATED MUD (A)	P	P	N/A	N/A	N/A
Drill Date		Source Summary				
None Available						
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	Seller		
30.183812	-95.156119	0	11/29/2016	TX1700071		

(Inactive/Offline Sources)			
SourceNumber	Name	Status	Depth

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



- End of Report -

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