

PWS_0460172_CP_20240606_INVESTIGATION
Texas Commission on Environmental Quality
Investigation Report

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Customer: SJWTX, Inc.
Customer Number: CN602969396

Regulated Entity Name: SJWTX TRIPLE PEAK PLANT

Regulated Entity Number: RN101247039

Investigation # 1995861

Incident Numbers

424368

Investigator: CHRIS FRIESENHAHN

Site Classification SW >1K-10K CONNECTION

Conducted: 06/06/2024 -- 07/19/2024

NAIC Code: 221310

SIC Code: 4941

Program(s): PUBLIC WATER SYSTEM/SUPPLY

Investigation Type: Compliance Investigation

Location: INTERSECTION OF MECKEL RD/TRIPLE
PEAK RD.

Additional ID(s) 0460172

Address: ,

, ,

Local Unit: REGION 13 - SAN ANTONIO

Activity Type(s)

PWSCMPL - PWS Complaint

PWSBACSWFC -

Bacteriological/Surface Water
Focused

PWSDISSWFC - Distribution
System/Surface Water Focused

Principal(s):

Role

RESPONDENT
RESPONDENT

Name

SJWTX INC
TEXAS WATER CO

Contact(s):

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Role	Title	Name	Phone
PARTICIPATED IN	WATER QUALITY TECHNICIAN	MS CASSIDY FORD	Office (830) 609-7806
REGULATED ENTITY MAIL CONTACT	PRESIDENT	MS AUNDREA WILLIAMS	Office (281) 726-4520
REGULATED ENTITY CONTACT	VICE PRESIDENT OF OPERATIONS	MR MICHAEL SMYTH	Phone (830) 312-4600 Office (830) 609-7806
PARTICIPATED IN	CHIEF OPERATOR	MR ADAM GONZALES	Office (830) 832-9936
NOTIFIED	OPERATIONS SUPERINTENDENT	MR RONNIE RODRIGUEZ	Office (830) 730-7240 Cell (830) 730-7240
PARTICIPATED IN	OPERATIONS SUPERINTENDENT	MR RONNIE RODRIGUEZ	Office (830) 730-7240
REGULATED ENTITY CONTACT	OPERATIONS SUPERINTENDENT	MR RONNIE RODRIGUEZ	Office (830) 730-7240

Other Staff Member(s):

Role	Name
Supervisor	JOY THURSTON-COOK
QA Reviewer	AARON RODRIGUEZ

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
WATER EQUIPMENT	Equipment
PWS COMPLAINT INVESTIGATION	INV NO 1995867
PWS FOCUSED INVESTIGATION - DISTRIBUTION RECORDS AND EVALUATION	DISTRIBUTION
PWS FOCUSED INVESTIGATION - BACTERIOLOGICAL ASPECTS OF PWS REQUIREMENTS	BACT

Investigation Comments:**INTRODUCTION**

06/03/2024- A complaint alleging that the SJWTX Triple Peak Plant public water system (PWS) was providing poor quality water, which was causing their iron filter to become fouled, was received by the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office. They were also concerned that the water might be contributing to elevated iron levels indicated in their recent blood analysis results. Additionally, the complainant advised that they made Mr. Ronnie Rodriguez, Operations Superintendent with the Texas Water Company, aware of their concerns. The complainant also provided an email with a photograph illustrating their fouled water filter. Incident No. 424368 was generated, and the complaint was assigned to an investigator for evaluation.

An email was issued, and a voicemail was left with Mr. Rodriguez requesting an update on any water quality

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issues they were experiencing in the Canyon Lake Hills area of the SJWTX Triple Peak Plant PWS distribution system.

06/05/2024- The complainant was contacted, and a complaint investigation was scheduled at their residence at 11:30 AM the following day.

06/06/2024- The complaint investigation was conducted, and it consisted of an observation of the water followed by free chlorine residual, pressure, and iron concentration checks. The water was found to be clear and free of any particulate, color or foul odor. The free chlorine residual and pressure was found to be adequate, and iron was found to be present in the water. In addition, a water sample was submitted to Pollution Control Services (PCS) for bacteriological analysis.

Mr. Rodriguez was contacted via email and telephone, and he was advised of the complaint investigation findings and associated violations noted as a result. He advised that he had been made aware of the concerns, the PWS was actively trying to remedy the situation, and he would provide answers to the questions provided in the email.

06/07/2024- An email from PCS which included the bacteriological sample results were received by the TCEQ San Antonio Region Office.

06/14/2024- An email from Mr. Rodriguez was received by the TCEQ San Antonio Region Office which included a letter in response to the 06/06/2024 request.

06/18/2024- A voicemail from the complainant was received by the TCEQ San Antonio Region Office requesting an update on the complaint investigation.

That same day, an appointment was scheduled with Mr. Rodriguez to meet the next day at the Riviera and Hampton facilities to facilitate raw water and entry point sampling for the presence of iron and manganese.

06/19/2024- The well sites were visited and entry point samples for iron and manganese concentration analysis were pulled. Field measurements for iron concentration were also conducted at the Riviera and Astro wells and the entry points at the Riviera and Hampton facilities. The entry point samples for iron and manganese analyses were shipped to ALS Laboratories later that same day.

06/20/2024- An exit interview form citing two violations was emailed to Mr. Rodriguez. The email also requested a copy of the distribution map for the area in question, as well as copies of results for the iron and manganese samples the water system submitted for the Riviera, Hampton, and Astro wells on 05/21/2024.

That same day, emails from both the complainant and Mr. Rodriguez were received by the TCEQ San Antonio Region Office. The email from the complainant included copies of sample results, presumably provided to them by The Texas Water Company, with Project Names identified as "Riviera Well" and "Hampton Well" for samples taken on 07/31/2023. The email from Mr. Rodriguez included the sample results with Sample IDs. Identified as "Riviera Well Go460172Y", "Hampton Well Go460172AI", "Astro Well #1 Go460172W" and "Astro Well #2 Go460172X" for samples taken on 05/21/2024.

07/01/2024- A follow up request for the distribution map was emailed to Mr. Rodriguez.

07/09/2024- The results for the samples submitted on 06/06/2024 to ALS Laboratories for iron and manganese analyses were received via email by the TCEQ San Antonio Region Office.

07/10/2024- An email from Mr. Rodriguez was received by the TCEQ San Antonio Region Office and it included a copy of the distribution system map.

07/19/2024- The sample results were analyzed, and it was ultimately determined that an additional violation was warranted. An updated exit interview form which included the additional violation and an Additional Issue referencing more frequent water main flushing as predicated by water quality and complaints, was emailed to Mr. Rodriguez.

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A Notice of Violation letter has been issued to facilitate compliance.

GENERAL FACILITY AND PROCESS INFORMATION

The following water system information was compiled during the last comprehensive compliance investigation (CCI) conducted from 10/27/2020 through 03/18/2021 (Investigation No.: 1679953):

The SJWTX Triple Peak Plant water system is a community water system utilizing surface water from Canyon Lake and groundwater. The system serves 8,552 metered connections and population of approximately 25,656.

A complete water system description can be located in Investigation No. 1679935.

BACKGROUND

10/27/2020 through 03/18/2021- The previous CCI was conducted and four violations and an Additional Issue were cited as a result. The violations were resolved as a result of Investigation Nos. 1747176 and 1793644.

Current Enforcement Actions: N/A

Agreed Orders and Compliance Agreements: N/A

Complaints and other Compliance Issues:

01/28/2024-A complaint alleging that the SJWTX Triple Peak Plant public water system was providing poor quality water in the Summit Ridge neighborhood, that is causing hair, skin and digestion issues, was received by the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office. Incident No. 416421 was generated, and a complaint investigation was conducted from 01/30/2024 through 02/02/2024. No violations were cited as a result of this complaint investigation.

07/28/2023-A complaint alleging that the drinking water provided by the SJWTX Triple Peak Plant public water system was discolored and sometimes oily in appearance was received by the TCEQ San Antonio Region Office. The complainant also advised that the water had been fouling up their water filters and they were having to change them out more frequently than years past. Incident No. 406771 was generated, and a complaint investigation was conducted from 08/07/2023 through 08/11/2023. No violations were cited as a result of this complaint investigation.

11/03/2022-A complaint alleging that the drinking water provided by the SJWTX Triple Peak Plant public water system is hard with a foul odor was received by the TCEQ San Antonio Region Office. Additionally, the complainant requested that the water be tested. Incident No. 390057 was generated, and a complaint investigation was conducted from 08/07/2023 through 08/11/2023. No violations were cited as a result of this complaint investigation.

06/20/2022-A complaint was received by the TCEQ San Antonio Region Office alleging low water pressure in the SJWTX Triple Peak Plant water system distribution. Incident No. 382505 was generated, and a complaint investigation, which included a pressure study, was conducted from 07/25/2022 through 08/01/2022. No violations were cited as a result of this complaint investigation.

03/09/2022-A complaint was received by the TCEQ San Antonio Region Office alleging low water pressure in the SJWTX Triple Peak Plant water system distribution. Incident No. 376200 was generated, and a complaint investigation, which included a pressure study, was conducted from 04/25/2022 through 05/04/2022. No violations were cited as a result of this complaint investigation.

05/05/2020-Two complaints were received by Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office alleging low water pressure in the SJWTX Triple Peak Plant water system distribution.

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Incident No. 335181 was generated, and a complaint investigation was conducted from 05/14/2020 through 07/23/2020. No violations resulted from this complaint investigation.

08/12/2019-A complaint was received by the TCEQ San Antonio Region Office regarding the watering restrictions implemented according to the water system's drought contingency plan. Incident No. 320278 was generated, and a complaint investigation, which included a pressure study, was conducted from 08/21/2019 through 09/12/2021. No violations were cited as a result of this complaint investigation.

ADDITIONAL INFORMATION

06/03/2024- The complainant advised that the water being provided by the SJWTX Triple Peak Plant water system had a high iron concentration which was causing them to have to replace their water filters more frequently and is concerned that the iron level in their blood appears to be affected by the water. They further advised that the same water quality issue occurred July of 2023 and in response the water system provided a bypass to exclude the Riviera and Hampton wells. Additionally, the complainant said that the two wells had recently been brought back online, congruent with the recent change in water quality. The complainant pointed to the potential of failing infrastructure (water mains) as a possible cause for the dirty water.

06/05/2024- The complainant was contacted, and a complaint investigation was scheduled at their residence at 11:30 AM the following day.

06/06/2024- The complaint investigation was conducted, and it consisted of an observation of the water followed by free chlorine residual, pressure, and iron concentration checks. The water was found to be clear and free of any particulate, color, and foul odor. The free chlorine residual and pressure was found to be adequate at 1.56 milligrams per Liter (mg/L) and 110 pounds per square inch (PSI), and iron was measured at 0.45 mg/L. In addition, a water sample was taken for bacteriological analysis. The complainant's spouse provided some of their used five-micron filters which were coated/clogged in what appeared to primarily be iron, one of the filters was said to have only filtered 2,100 gallons of water. Additionally, they voiced concerns that elevated iron, and liver enzymes (aspartate aminotransferase (AST) and alanine transaminase (ALT)) levels as documented in blood analysis results for the complainant appeared to be in direct correlation with consuming the water. The complainant's spouse was advised that the presence of iron in drinking water is considered to be a secondary constituent, primarily creating issues aesthetically and was not considered to a threat to human health. Additionally, it was advised that shifting water levels in the wells could affect the water quality including iron and manganese concentrations.

Mr. Rodriguez was contacted via email and telephone, and he was advised of the complaint investigation findings and associated violations noted as a result. He advised that the bypass that precluded the Riviera and Hampton wells, had been discontinued; however, he claimed that after receiving some water quality complaints, the bypass was again instituted on 05/03/2024. He further advised that 75-80% of the water is from the Triple Peak distribution with the Riviera well only contributing the remaining 20-25%, which would theoretically blend the other Triple Peak distribution water, thus decreasing the iron concentration in the water coming from the well. Mr. Rodriguez further advised that samples were taken from the Riviera, Hampton and Astro wells on 05/21/2024 for iron and manganese concentration analysis. These results were requested by the TCQ San Antonio Region Office.

Historical sampling data listed in the Texas Drinking Water Watch website indicated that the iron concentration in Riviera well was 0.287 mg/L on 12/07/2022 and in the Hampton well was 0.01 mg/L. Both of these levels are below the maximum secondary constituent level of 0.3 mg/L for iron.

06/07/2024- The bacteriological sample results were received by the TCEQ San Antonio Region Office and they indicated that the water sample was absent any bacteriological contaminants.

06/14/2024- An email from Mr. Rodriguez was received by the TCEQ San Antonio Region Office which included a letter in response to the 06/06/2024 request. The response reiterated that the Riviera well had been offline from 09/26/2023 through 01/17/2024 and the Hampton well was offline from 12/11/2023 through 03/11/2024. A bypass which had been in place to preclude the Riviera and Hampton well facilities

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was valved off on 04/22/2024; however, in response to some water quality concerns, it was later reactivated on 05/03/2024 to allow the Triple Peak Plant distribution to supplement the two wells. It also advised that flushing activities were actively taking place with 132,000 gallons flushed year to date, and they would continue their flushing activities, focusing on directional and scoured flushing. The letter informed that they agreed that one of the primary contributing issues was likely the aging infrastructure, with some of the mains being approximately 40 years old and that the water main replacement issue was being elevated in the water system's overall main replacement program. Lastly, it was explained that the cleaning of the Riviera and Hampton ground storage tanks had been conducted in house, and the Hampton ground storage tank was budgeted for replacement as part of their 2024 capital program, with the tank replacement currently in the design phase and construction to commence by the end of 2024.

06/19/2024- The well sites were visited with the assistance of Mr. Rodriguez and Ms. Cassidy Ford, Water Quality Technician, and entry point samples for iron and manganese concentrations were pulled. Field measurements for iron concentration were also conducted at the Riviera and Astro wells and the entry points at the Riviera and Hampton facilities. The iron concentrations were found to be 0.32 mg/L and 0.03 mg/L at the Riviera and Astro wells respectively and 0.33 mg/L and 0.03 mg/L at the Riviera and Hampton entry points respectively. The water at each location appeared clear, free of any particulate, color and odor. The samples for iron and manganese analysis were shipped to the lab later that same day. During the investigation, the complainant, their spouse, and two other customers were present. The complainant produced filters which were coated in an orange film, which appeared to be iron. The complainant voiced his concern that issue was primarily in the water mains. Mr. Adam Gonzales, Chief Operator arrived on scene and he, along with Mr. Rodriguez, advised that they were exploring all options including water main replacement and cleaning out the water mains. The cleaning options included "pigging" the water lines with an ice slurry or a more traditional pig which is a solid conical shaped projectile, both of which would essentially scour the inside lining of the water mains. It was cautioned by Mr. Gonzalez that traditional pigging may not work due to potential unknown differences in water main sizes due to repairs/replacements that may have taken place in the past. Additionally, Mr. Gonzalez advised that any actions to include the replacement of the water mains would take time to plan, acquire needed funds and initiate the work. He also advised that any such timeframe would also likely be affected by supply chain issues. Mr. Gonzalez and Mr. Rodriguez assured the complainant and other participants that the issue was going to be given priority. The complainant's spouse voiced their concern that the water's iron concentration was adversely affecting the complainant's health, specifically they believe the elevated iron as indicated in blood analysis correlates directly with consuming the water. It was again advised that iron in drinking water regulated an aesthetic issue and not a human health concern.

06/20/2024- An exit interview form citing two violations was emailed to Mr. Rodriguez. The email also requested a copy of the distribution map for the area in question, as well as copies of results for the iron and manganese samples the water system submitted for the Riviera, Hampton, and Astro wells on 05/21/2024.

That same day, emails from both the complainant and Mr. Rodriguez were received by the TCEQ San Antonio Region Office. The email from the complainant included copies of sample results, presumably provided to them by The Texas Water Company, with Project Names identified as "Riviera Well" and "Hampton Well" for samples taken on 07/31/2023. The email from Mr. Rodriguez included the sample results with Sample IDs. Identified as "Riviera Well Go460172Y", "Hampton Well Go460172AI", "Astro Well #1 Go460172W" and "Astro Well #2 Go460172X" for samples taken on 05/21/2024.

The results of the 07/31/2024 indicated that iron and manganese concentrations were 0.710 mg/L and 0.02 mg/L respectively at the Hampton Well and 0.45 mg/L and 0.037 mg/L respectively at the Riviera Well. At that time, the water system responded by placing the wells out of commission and bypassed those associated facilities with water from the primary distribution of the Triple Peak facility. The results of the analysis for the 05/21/2024 samples indicated that the iron and manganese concentrations were measured at 0.260 mg/L and 0.045 mg/L respectively at the Riviera Well, 0.024 mg/L and <0.010 mg/L respectively at the Hampton Well, 0.029 mg/L and <0.010 mg/L respectively at Astro Well #2, and <0.010 mg/L and <0.010 mg/L respectively at Astro Well #1.

07/09/2024- The results for the samples for iron and manganese analysis submitted by the investigator were received via email by the TCEQ San Antonio Region Office.

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07/19/2024- The sample results were analyzed, and it was ultimately determined that due to the iron concentration of 0.426 mg/L being reported, an additional violation citation was warranted. An updated exit interview form which included the additional violation and an additional issue referencing additional water main flushing as predicated by water quality and complaints, was emailed to Mr. Rodriguez.

Three violations and an additional issue were cited as a result of this investigation.

The Safe Drinking Water Act requires monitoring of public water systems on a regular schedule, many of the samples are collected by third party contractors, hired by the TCEQ, not the water system. Water sample results are available for public review on the Texas Drinking Water Watch website:
<https://dww2.tceq.texas.gov/DWW/>.

SJWTX, Inc. is currently listed as the responsible party; however, it has been changed to The Texas Water Company. The name change has not officially been submitted by the Texas Water Company, thus SJWTX, Inc. will remain until that occurs.

NOV Date 08/09/2024 **Method** WRITTEN

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

Track Number: 884507

Compliance Due Date: 10/08/2024

Violation Start Date: Unknown

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 1995861

Comment Date: 07/01/2024

Failure to maintain watertight conditions.

At the time of the investigation, the ground level access panel on the Hampton Facility ground storage tank was leaking.

30 TAC 290.46(m)(4)--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.

Recommended Corrective Action: Using methods and materials which meet American Water Works Association (AWWA) standards, repair the leaking access panel on the Hampton Facility ground storage tank to ensure that it is tight against leakage.

To document compliance, submit photographic documentation which indicates that the repairs have been made and that the tank is tight against leakage to this office by the compliance due date.

Track Number: 884510

Compliance Due Date: 10/08/2024

Violation Start Date: Unknown

30 TAC Chapter 290.43(c)(2)

Alleged Violation:

Investigation: 1995861

Comment Date: 07/19/2024

Failure to provide a ground storage tank with an access opening.

At the time of the investigation, the ground storage tank at the Hampton facility had not been equipped with a roof access opening. The only access point on the roof of the is a bolted port which also includes the air vent, and it does not meet the requirement of an access opening in 30 TAC 290.43(c)(2).

30 TAC 290.43(c)(2)- All roof openings shall be designed in accordance with current AWWA standards. If an alternate 30-inch diameter access opening is not provided in a storage tank, the primary roof access opening shall not be less than 30 inches in diameter. Other roof openings required only for ventilating purposes during cleaning, repairing or painting operations shall be not less than 24 inches in diameter or as specified by the licensed professional engineer. An existing tank without a 30-inch in diameter access opening must be modified to meet this requirement when major repair or maintenance is performed on the tank. Each access opening shall have a raised curbing at least four inches in height with a lockable cover that overlaps the curbing at least two inches in a downward direction. Where necessary, a gasket shall be used to make a positive seal when the hatch is closed. All hatches shall remain locked except during inspections and maintenance.

Recommended Corrective Action: Equip the the ground storage tank with a roof access opening which meets the requirements of 30 TAC 290.43(c)(2), or place the tank out of service.

To document compliance, submit photographic documentation which indicates that the roof access opening on the ground storage tank has been installed or documentation certifying that the tank has been placed out of service to this office by the compliance due date.

Track Number: 886242

Compliance Due Date: 10/08/2024

Violation Start Date: Unknown

30 TAC Chapter 290.118(a)

Alleged Violation:

Investigation: 1995861

Comment Date: 07/19/2024

Failure to meet the secondary constituent level (SCL) for iron.

At the time of the investigation, it was determined that the water system exceeded the secondary constituent level for iron, 0.3 mg/L, at Entry Point 012 (Riviera Well Site). An entry point sample was taken as a result of a compliant investigation on 06/19/2024. The iron was measured at 0.426 mg/L, which exceeds the SCL of 0.3 mg/L.

30 TAC 290.118(a) - Applicability for secondary constituents. The requirements for secondary constituents apply to all public water systems. Water that does not meet the secondary constituent levels may not be used for public drinking water without written approval from the executive director. When drinking water that does not meet the secondary constituent levels is accepted for use by the executive director, such acceptance is valid only until such time as water of acceptable chemical quality can be made available at reasonable cost to the area(s) in question.

Recommended Corrective Action: Provide a treatment method to ensure that the SCL for iron is below 0.3 mg/L at EP012, or discontinue use of the well in question until the iron level drops at the source drops below 0.3 mg/L, or present and acquire approval of a method to blend an additional source at EP012 to lower iron level below 0.3 mg/L.

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Please be advised that public water systems shall notify the executive director prior to making a significant change resulting in an increase or decrease of the system's production, treatment, storage, pressure maintenance or distribution facilities. Significant changes to the water system facilities require submittal and prior approval of engineering plans by the TCEQ Plan Review Team (PRT). All submittals must be mailed to:

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

For questions regarding any submittal contact the TCEQ PRT at (512) 239-4691 or PTRS@tceq.texas.gov.

The entity must ensure that the engineering plans are submitted by a licensed professional engineer.

To document compliance, provide documentation including photographs and/or receipts, invoices or completed work orders indicating that enhanced treatment is being provided, along with its associated approval letter from TCEQ PRT, certify that use of the well has been discontinued, or that a method to blend has been approved to this office by the compliance due date.

Additional Issues

Description Item 4

Additional Comments

Although dead-end mains and associated distribution mains are being flushed at least once monthly, poor water quality may warrant additional flushing. To ensure good water quality, increase the flushing activities as needed in areas affected by poor water quality.

30 TAC 290.46(l)- 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.

Signed


Environmental Investigator

Date

8/6/24

Signed


Supervisor

Date

8/6/2024

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : NOV

☐ Investigation Report

☒ Sample Analysis Results

☐ Manifests

☐ Notice of Registration

☐ Maps, Plans, Sketches

☐ Photographs

☒ Correspondence from the facility

☐ Other (specify) :

Letter to complainant

Correspondence w/ complainant.