

**Texas Commission on Environmental Quality**  
**Summary for Drinking Water Advisory Work Group**  
**TCEQ Complex, Building F, Room 2210, September 14, 2004**  
**12015 Park 35 Circle (I-35 North between Braker and Yager), 9:00 am - 12:00 noon**

**Welcome/Introduction:** Buck Henderson, Section Manager, Public Drinking Water (PDW) Section

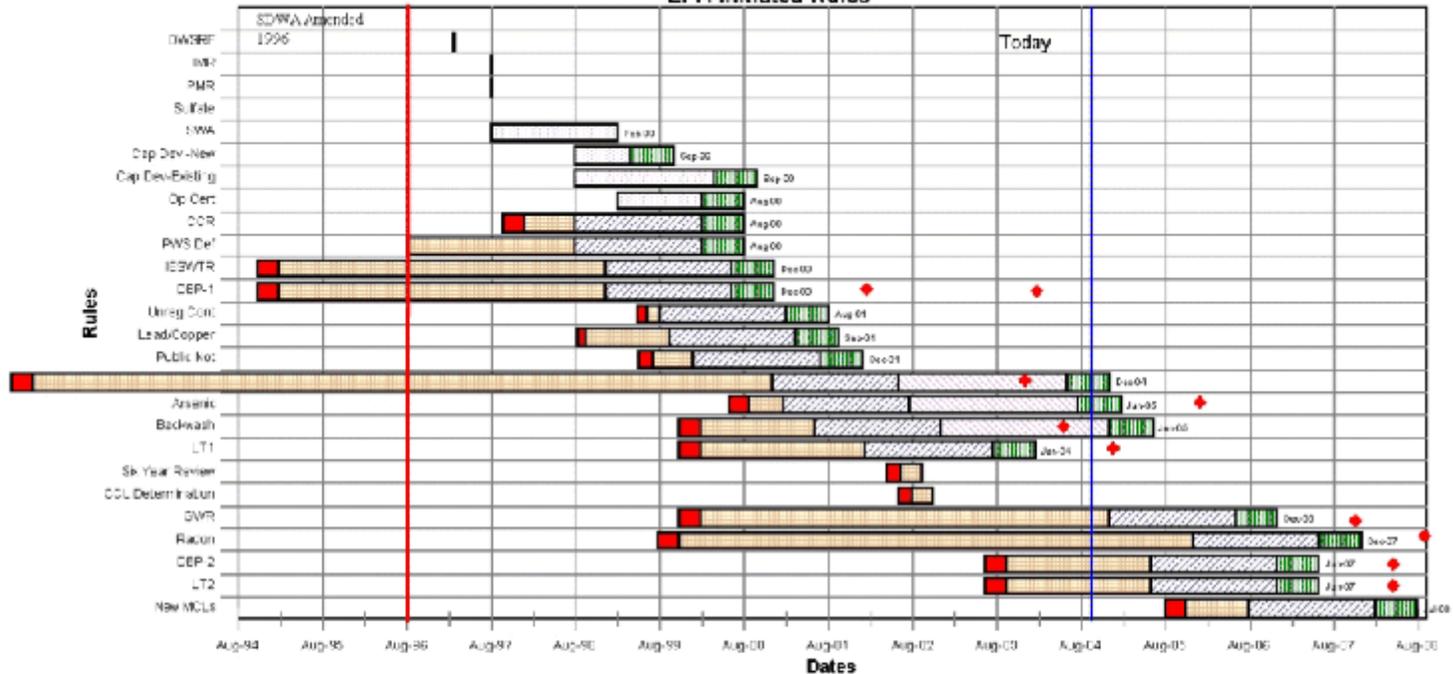
- Drinking Water Advisory Work Group (DWAAG) members, guests, and attendees introduced themselves and their affiliation.

**TCEQ Staff Updates:** Tony Bennett, Technical Specialist, Water Supply Division

**Federal Rules:** (Hand-outs: see attached Gant Chart on Federally Initiated Rules, September 12, 2004)

- Identified intersections of interest: final rule development dates:
  - Radionuclides Rule (Rad R)
  - Arsenic Rule (As R)
  - Ground Water Rule (GWR):
    - Estimated final rule adoption date: December 2004
    - TCEQ final rule adoption date: December 2006
    - TCEQ final rule effective date: December 2007
    - Greatest impact will be on the smaller public water systems (PWSs)
- Recently Adopted rules implemented:
  - Filter Backwash Rule (FBWR)
  - Long Term I Interim Enhanced Surface Water Rule (LT1 IESWTR)
- Rules not yet adopted: Radon Rule
  - No direction received from EPA as of last report.
- New & pending rules: rules pending federal adoption.
  - Stage 2 Disinfection Byproducts Rule (DBP2)
    - Final rule adoption date: Projected summer 2005
    - TCEQ final rule adoption date: Projected summer 2007
  - Long Term Stage 2 Enhanced Surface Water Treatment Rule (LT2)
    - Final rule adoption date: Summer 2005
    - TCEQ final rule adoption date: Summer 2007
  - Total Coliform Rule (TCR) Six-year Review
    - Federal rule proposal date: No earlier than June 2005
    - Next round of UCMR monitoring : starts January 1, 2006.
- Additional comments:
  - Rad R / As R rule development:
    - TCEQ date of proposal: July 2004
    - Texas Register posting date: August 2004
    - comment period ending date: September 13, 2004
    - Approximately 9 comments known to be received by close of comment period.
      - look for posting on internet at [http://www.tceq.state.tx.us/nav/rules/propose\\_adopt.html](http://www.tceq.state.tx.us/nav/rules/propose_adopt.html)
    - DWAAG Rad R/As R Subcommittee:
      - Prior to TCEQ adoption date, propose to meet again to discuss:
        - information on fiscal impacts
        - additional discussion

### Public Water System Rule Schedule EPA Initiated Rules



-  Comment on EPA proposal
-  Develop Plans After EPA Guidance
-  EPA Review Comments - Final Rule
-  TCEQ Prepare and Process Rule
-  Extension Period
-  TCEQ Prepare and Adopt Final Rule
-  Effective date

September 14, 2004

### **The Perchlorate Study:**

- Perchlorate Study: High Plains Aquifer Study on Perchlorate
  - Texas Tech University's Water Resource Center (TTU WRC)
  - Contract funded September 1, 2001 through August 31, 2004
  - TTU WRC Final Draft Report is in-house under review
    - Final chapters still in development due October, 2004
  - Point source vs. non-point source, report indicates naturally occurring source in West Texas
    - Will greatly influence cost/benefit analysis required by EPA
      - Increasing projected cost for removal

### **The TCEQ Regulatory Process:** recent changes within TCEQ affecting rule development process.

- TCEQ has amended process requiring up front work on rules:
  - Concept Paper generation to facilitate informing upper management & Commissioners on proposed rules.
  - Processes will allow greater interaction with Stakeholders

### **TCEQ Staff Updates, continued:** Ruben Alvarado, Technical Review & Oversight Team

#### **PDW 290 Rules:** update on 30 TAC Chapter 290 rule development.

- Changes within TCEQ for intra-agency regulatory process have slightly slowed rule development
- New process finalized and on track for new rule package at end of 2004.
- Requested comments have been received and are under review
- Exceptions: increased number requests for exceptions to the Rules and Regulations being received
  - mainly due to changes in disinfection methods
    - e.g., purchase water systems realizing impacts of Disinfection By Products Rule (DBP1) implemented December 2000.
- Alternate Capacity Requirements: large number of requests being received
  - larger number denied during early 2004
    - mainly due to lack of justification provided
  - approvals looking better during mid 2004
    - more timely review w/ 60 day turn-around
  - If not reviewed within 90 days then automatically goes into effect!
- Superior/Approved Process: designation of Superior or Approved water status.
  - Long history in public drinking water
  - Requirements: 30 TAC Chapter 290 Subchapter D, 290.47(a)
    - public water system requests in writing.
    - minimum drinking water quality standards (30 TAC Chapter 290 Subchapter F)
      - Superior = must meet primary and secondary.
      - Approved = must meet primary, may meet secondary, requires Executive Director's approval otherwise.
    - must have met all rules and regulations for 2 years or better
  - Receiving 1 to 2 requests per month.
  - DBPs causing issues of concern, e.g., increases in Trihalomethane (THM) negating granting of requested status pending 100% compliance in the future, for 2 years.

#### **Questions/Comments on PDW 290 Rules update:**

**Question I:** What benefit does it do for the distribution system in allowing a public water system with a secondary exceedance of the drinking water quality standards to receive a Superior or Approved status?

**Answer I:** The Approved status indicates the water system meets all requirements addressing public health related concerns. Secondary standards are designated for taste, color, and odor benchmarks where aesthetic quality may be challenged. Approved status shows the water system is on top of issues of public health concern and are doing a good job. Should the

water system receive an unfavorable Comprehensive Compliance Inspection (CCI) from the TCEQ Regional Office compliance investigator, the water system would be placed on “Provisional” status. This will generate a letter to the water system official indicating the water system must meet 100% of 30 TAC Chapter 290. The TCEQ allows time for the water system to come within compliance of these rules, but will be requested to remove signs if still not 100% compliant within the grace period allowed. This program serves to recognize good work and foster community pride.

**Question II:** What is the current status of the draft rules addressing high density polyethylene plastic pipes?

**Answer II:** This rule is currently held up in the process with the 30 TAC Chapter 290 rule package. Looking at a two month delay to date. TCEQ is currently drafting the Concept Paper prior to the rule initiation form. The time line for Executive Management review is yet to be determined and may vary per rule.

**Question II follow-up:** Can/will this new process be implemented with this rule package?

**Answer II follow-up:** All proposed rules must use the newly designated TCEQ rule process.

**Question III:** Will the 30 TAC Chapter 290 rule package contain anticipated changes to the 290's for the –14 Manual?

**Answer III:** Don't know of any. But, reformatting of Appendix I is anticipated. Reformatting to better identify health related issues of concern and mandatory actions for same, e.g., mandatory inspections to be performed at the time of annual inspection v.s. at the time of installation. TCEQ has identified many questions have been due to the confusion inherent in Appendix I. Anticipate work on this table to make it more legible and user friendly. **Question IV:** Will the Concept Paper process be generated by/for internal review or stakeholder driven?

**Answer IV:** Internal. Concept Paper is to be an internal paper generated prior to rule making process for briefing executive management. Cannot state this paper will be exclusively internal at this time.

**Question V:** Per my understanding of your Commissioners desires, this Concept Paper process is to generate greater stakeholder involvement. With Concept Paper prior to stakeholder involvement, at what point does the increased stakeholder involvement take place?

**Answer V:** The TCEQ anticipates opportunities for early stakeholder involvement. This is not to be a preclusive process and will open up greater opportunities for stakeholder involvement. Stakeholders will be brought into the loop after rule development team(s) have completed the Concept Paper and received comment/direction from Executive Management.

**TCEQ Staff Updates, continued:** Sean Ables, Geologist, Drinking Water Protection Team

**Source Water Assessment & Protection:** Recently reorganized into the Drinking Water Protection Team

- Source Water Protection Contract awarded to PBS & J Consultants for 2005 - 2007 protection development.
- GWR assessments of groundwater wells initiated
- Source Water Susceptibility Assessments (SWSAs) @ 97% complete for round I assessments
- Currently compiling data for round II assessments
  - SWSAs round II projected start date: December, 2004.
  - anticipate performing 1/3 each year with 3 year cycle

**Draft SWAP Consumer Confidence Rule (CCR) Language:** TCEQ is currently working with the EPA to develop acceptable language to be used in the CCR to provide results of SWSAs.

- Work is moving forward.

**Question VI:** Where is the SWAP Program going in working with utilities, municipalities, and other water systems to convert SWSAs into public information?

**Answer VI:** TCEQ is currently purchasing software to facilitate ability to provide electronic copies of the SWSAs.

**Question VI follow-up:** How does the SWAP Program propose to reduce SWSAs into a few lines? Do they intend, or are they working with stakeholders, e.g., utilities?

**Answer VI follow-up:** The SWAP Program is currently working with EPA to identify language acceptable to both EPA and the TCEQ. TCEQ anticipates working with public water systems to fine tune the language developed. The challenge to the EPA and TCEQ is to develop non-alarming and educational language, delivering the message that each water system's susceptibility varies, with standardized methods for information dissemination. It is important to stress the difference between risk and susceptibility. There will further work with the stakeholders at a later date. The intent is make each consumer aware the SWSAs are available. EPA wants better language and dissemination while not overloading the water system administration with requests. This language will require correct focus with proper feedback mechanisms.

**Question VII:** What work will PBS&J be doing for the SWAP Program?

**Answer VII:** SWSAs lead to Source Water Protection (SWP). The new contractors will be developing contingency plans for public water systems.

**Question VII follow-up:** Will the new contractors be helping public water systems?

**Answer VII follow-up:** Yes. This assistance has been contracted through the TCEQ. The TCEQ will assign the work.

**TCEQ Staff Updates, continued:** Alicia Diehl, Team Leader, Drinking Water Quality Team

**Drinking Water Quality Updates:** current information on Drinking Water Quality Standards, 30 TAC Chapter 290 Subchapter F, compliance, CCR, DBPs, and the sampling contract.

- Coliform Guidance manual in development
  - To assist with GWR implementation
  - Currently in the editing stage with an anticipated 90 turn-around.
  - Look for this guidance at the next meeting
- TCEQ awarded the Drinking Water Sampling Services contract for 2005 - 2007
  - Applied Earth Sciences
    - To become Delta Environmental Consulting on September 15, 2004. Based out of St. Paul, Minnesota
    - Contract start date September 9, 2004
  - Contract includes new contact capturing process:
    - Letter of notification mailed to all water systems
    - Back of letter contains "Point of Contact Tracking Form"
    - Please complete "Point of Contact Tracking Form" and return
      - tracking of primary point of contact to direct varying correspondence accordingly
- Disinfection By-Product (DBP) exceedances are on the rise with many water systems experiencing trouble during the third quarter of 2004.
  - Trihalomethanes (THMs)
    - 95 currently exceeding their running annual average (RAA).
  - Haloacetic Acids (HAA5s)
    - 34 currently exceed the maximum contaminant level (MCL).
  - Unique exceedances
    - 25 currently exceed both THM & HAA5 MCLs
  - 4<sup>th</sup> Quarter 2004 Projections
    - Anticipate additional 100+ violations
  - These exceedances and violations of the MCLs should not be a new issue as water systems have been aware of DBPs since 1999.

**Consumer Confidence Rule (CCR):** Update provided by Debra Cerda, CCR Coordinator, Water Supply Division.

- Key elements:
  - Driving force behind CCRs is the Safe Drinking Water Act (SDWA).
  - TCEQ must meet primacy requirements of the CCR, including enforcement actions.
  - The State of Texas rule must be no less stringent than the federal CCR.
- Since implemented, there have been updates to the CCR provided through other rules.
  - DBP1 & As R
- TCEQ is proposing new rule September 15, 2004.
  - Public Comment period open
  - 2 week window of opportunity to comment, October 1 through . . .
  - posted on the internet
- Concerns
  - Delivery date to the TCEQ is July 1, each year, not August 1.
    - Must send in certification and report

- Certain corrections have been made for changes to, or addition of new mcls.
  - DBPs
    - HAA5s
    - THMs
  - Uranium
  - Disinfectant Residual Levels (DRLs)
- Summary of susceptibility statements language from Executive Director (ED) or approved by ED.
  - Working with EPA and stakeholders to generate and promote language.
- Major impacts of new rule:
  - Waiver granted for mail in requirement for water systems serving  $\leq 500$  population.
    - Waiver allows water system to provide an amended report.
      - What, Where, How, With posting.
    - TCEQ to identify and provide notification to qualifying water systems.
    - Example of qualifying process:
      - A water system which exceeds the secondary standards for any constituent would not be allowed to take advantage of this waiver. Those water systems out of compliance or under enforcement will not be allowed to take advantage of this waiver.
  - Presenters notes provided in italics follow:

The proposed changes to Subchapter H with the greatest impact to water systems include the following:

The federal Safe Drinking Water Act establishes requirements that states must meet to maintain primary enforcement responsibility for their public water systems, including adopting drinking water rules that are no less stringent than the corresponding federal regulations.

1) Community water systems will be required to deliver the CCR and certification to the primacy agency by July 1st of each year

2) Addition or changes to contaminants as a result of subsequent rule making after August 11, 2000 initial adoption of the CCR Rule, to include uranium, DBPs MCLs, MRDL

3) the required summary concerning system's susceptibility to potential sources of contamination must contain language that is provided by the executive director or alternatively, language that has been written by a water system official and approved by the executive director (added language)

4) Federal rule allows for the governor's designee can determine whether to waive the mailing/direct delivery requirement for systems below certain populations. It has been determined that implementation of the waiver for the lower tier (serving 500 or fewer persons) could potentially save money for almost 2200 community PWSs. Systems that meet certain criteria can provide notice at least once per year that the CCR is available upon request- what the CCR is, how and where to obtain it. These systems will still be required to submit a copy of their report and certify to TCEQ that their customers have been notified. TCEQ will identify those systems meeting the requirements, and will be notified. Eligibility criteria is includes the following:

- ! Is not required to notify the public of a violation of a secondary constituent level on an annual basis,
- ! Had no public notification violations for primary drinking water quality parameters during the calendar year for which the CCR is created,
- ! Is in compliance with the CCR Rule for prior reporting years,
- ! Is not presently in Enforcement proceedings.

**Question VIII:** With the CCR to be proposed tomorrow, what is the comment period?

**Answer VIII:** 30 days. Comment period to open within 2 weeks, estimate October 1 through November 1, 2004. No public hearing on this rule package is anticipated.

**Question IX:** How does a water system apply for a CCR waiver?

**Answer IX:** The TCEQ will be identifying qualifying water systems from a universe of approximately 2200 community water systems.

**Question IX:** Is there a Concept Paper available for the CCR?

**Answer IX:** No, the CCR proposal pre-dates the recent rule proposal process and is not required. The CCR was originally proposed in January 2004.

**Question X:** Was there a previous draft review process? Don't recall seeing anything on this rule. How much discussion with the DWAWG has taken place?

**Answer X:** There has been previous discussion of the waiver process and the SWSA language. Rest of the language was written in 1999 and pre-dates the DBPI, etc.. With the advent of such rules as the As R, there have been required language corrections.

**Question XI:** What recommendations does the TCEQ have for areas to look for need to comment on the CCR?

**Answer XI:** Primary consideration should be addressed to the waiver process. The TCEQ will not be implementing 100% waivers for all water systems serving < 10,000 population. Unit cost is greater for smaller systems. Stakeholders in early rule development agreed economic impact(s) did not take precedent to providing the information to the citizens of Texas. Targeting < 500 population served.

**Question XII:** Is it a federal requirement the SWSAs contain federal language on CCR reports?

**Answer XII:** The TCEQ is still working with EPA to develop this language and must implement it when drafted to maintain primacy. The TCEQ must adopt no less stringent rules than the federal CCR. The TCEQ will continue to discuss the development of this language with stakeholders. For example, the language currently does not contain specifics for elevated constituents.

**Question XIII:** Why is there a difference between the new Plumbing Rule (PR) procedures and those used for the CCR?

**Answer XIII:** Timing is the answer. TCEQ has been meeting with EPA and must implement CCR. Changes include date of delivery to TCEQ. Change from due date of August 1, to due date of July 1. With the federal CCR EPA was specific with minutia. With a PR type rule, state must look at every way to adopt and improve on existing requirements. The federal CCR is a "lock step" process versus the PR being all over throughout.

**Question XIV:** At what time and in what way will the TCEQ work with staff to make changes in PR?

**Answer XIV:** See Ruben Alvarado for comments on the PR. CCR is a primacy requirement and as a must.

**Question XV:** Will the Rad R and As R Concept Papers fall by the wayside?

**Answer XV:** No, timing is an issue. Concept Paper is now under review by rule development team.

**Question XVI:** With the CCR, interpreting the federal rule, will secondary waivers for water systems serving 10,000 population be considered, or will the TCEQ consider dropping level cutoff to 1,000 population served?

**Answer XVI:** This has not been discussed beyond determination that 100% of all Texas residents will have access to CCR reports. There has not been a lot of feedback on the middle ground.

**Question XVI follow-up:** Has the TCEQ considered options for affordability for 10,000 to 1,000 populations served on a per capita costs?

**Answer XVI follow-up:** Take opportunity to submit comments. Rule language mentions 500, 1000, 1250, ... Comment on 1000, 1250, etc..

**Question XVI follow-up II:** Confirming the federal language is where you are getting this from?

**Answer XVI follow-up II:** Yes, from the federal rule. Comment on secondary tier. This was not a staff decision but did involve a large amount of stakeholder involvement at the time generated. Then, there was an expense in generating identified, and now staff are revisiting to identify validity. Cost of delivery was thoroughly discussed, e.g., cost of mailing four page document to 500 customers.

**Question XVII:** Please help with the confusion, did the SWAP language requirement come from the CCR?

**Answer XVII:** No, just that EPA required SWSA language in CCR and there has been no further elaboration requirements (beyond notifying customers of availability of SWSAs) at this time.

**TCEQ Staff Updates, continued:** Elston Johnson, Administration, Field Operations Division

Update on activities of the Field Operations Division's (FOD's) Regional Public Drinking Water Programs.

- Comprehensive Compliance Investigation (CCI) Business
  - 2700 CCIs performed during fiscal year 2004.
  - New CCI form to look for: Summary of Findings.
    - Beginning in 2005, when regional investigator has completed the scheduled CCI a summary of

findings will be provided. This summary will be in writing. Water system official will have option to sign or not. This will preclude unnecessary confusion and the TCEQ will maintain documentation each item annotated has been discussed with the water system.

- 2005 deliverables, e.g., designation of which groundwater systems to visit each year, will be based upon Risk Based Criteria (RBC). For example, a water system with primary and/or secondary violations, chronic problems, pH concerns, etc., will receive more direct attention. Directed approach in addition to more money next fiscal year will affect ability to perform CCIs at water systems deemed most useful.
  - Water systems using surface water sources will received CCIs every year.
  - Water systems using solely groundwater sources will be scheduled CCIs per the RBC
- TCEQ performed May/June review of all water systems outside of a 5 year review process
  - These water systems will be placed on a CCI priority list for 2004 - 2005.
- Contract generated for creation of portable hand held CCI data capture device.
  - Hand held with electronic CCI accessible
  - Selecting successful proposer
  - Will need to pilot on approximately 10 senior investigators and PDW Program.
  - 2006, look for full implementation with CCIs.

**Question XVIII:** During the wrap up session conducted after a CCI, will signing the Summary of Findings document imply out of compliance acknowledgment?

**Answer XVIII:** No.

**Question XVIII follow-up:** Is it clear on these forms that signing does not mean the water system is out or compliance?

**Answer XVIII follow-up:** This form is to be just a summary of initial findings and not a notice of violation.

- NSF certification requirements:
  - Rolling into 290 rule package under development.
    - see Ruben Alvarado or Doug Holcomb for more information.
  - Discrepancies exist between TCEQ staff guidance and NSF 60 relating to materials and additives. Equipment which may not come into direct contact with water treatment chemicals must meet NSF 60 & NSF 61 requirements. TCEQ hopes to provide clarity on which equipment may come into direct contact w/ treated water covered under NSF 61. But NSF 60 still applies and water systems must meet both NSF 60 & NSF 61.

**TCEQ Staff Updates, continued:** Buck Henderson presented on recent organizational changes within the Public Drinking Water Section.

- Reorganization within PDW Section designed to meet old initiatives coming to an end and facilitate new initiatives with overall focus on drinking water protection.
- SWAP Team has been renamed the Drinking Water Protection Team (DWPT)
  - reflects national focus on movement from assessments to protection
  - facilitating greater source to tap focus the DWPT
- Microbiological/Bacteriological Program moved from the Drinking Water Quality Team (DWQT) to DWPT
  - this move facilitates DWQT redirecting resources to address sampling contract and 30 TAC Chapter 290, Subchapter F (Drinking Water Quality Standards) compliance monitoring.
- Surface Water Monthly Operational Reports (SWMORs) Program moved to Technical Review & Oversight Team (TROT).
  - this move facilitates better support in addressing monthly operational reports and further consolidates the sections engineers.
- Homeland Security Coordinator is to report directly to the PDW Section Manager
  - this move lifts load of responsibility from TROT and emphasizes the level of importance for the PDW Program.
- Introduced new Utilities & Districts Section Manager
  - Earl Lott
    - Doug Holcomb remains in advisory capacity.

**TCEQ Staff Updates, continued:** Earl Lott, Manager, Utilities & Districts Section, Water Supply Division

- Earl Lott comes from the TCEQ's Water Quality Division management where he was Team Leader for the Land Application Team addressing agricultural activities.
- U&D Section is fully staffed.
- Addressing permit time frame issues and planning broad application training, e.g., basic training
  - intent is to streamline process and go over common errors
- 30 TAC Chapter 291 Rule changes.
  - Executive Director pre-file brief: November 2004
  - TCEQ final rule adoption date: May 2005
  - TCEQ final rule effective date: May 2005
- 30 TAC Chapter 293 Rule changes
  - TCEQ Agenda proposal date: October 2004
  - 30 day comment period
  - TCEQ final rule adoption date: March 2005
  - TCEQ final rule effective date: March 2006
- Financial, Managerial & Technical Capacity Development Contract 2005 - 2007
  - Awarded to Texas Rural Water Association
  - Margot Taunton, TCEQ Project Coordinator
    - For feedback call: Margot at #512-239-6403
    - or call Earl Lott at #512-239-4691
- Drinking Water State Revolving Fund Set Asides (DWSRF SAs)
  - Texas Water Development Board (TWDB) Annual Intended Use letter for DWSRF SAs
    - Mid-November 2004
    - Applications due by January 2005
    - TWDB point of contact is Bruce Crawford
    - TCEQ works with the TWDB to coordinate work
      - TCEQ Project Coordinator
        - Dorothy Young
- New Staff
  - Doug Holcomb retired and has returned as a Special Assistant
- Additional rule updates:
  - Rule Petition received
    - Greater Houston Area Builders Association
    - No determination to date from Executive Management
    - Set for Agenda on October 13, 2004

**TCEQ Staff Updates, continued:** Noreen Helmle, Operator Licensing, Compliance Support Division

(hand-outs: Texas Small Public Water System Training Program Brochure, Noreen Helmle business cards) Update information on the Operator Licensing Program activities.

- Texas Small Public Water System Training Program (see handout)
  - Contract awarded to Engitech
    - Clark & Beverly Benson: Contract Administrators
  - Contract signed June 1, 2004.
  - Advisory Group meeting to develop recommended courses
    - working group has been meeting for four months
    - Stakeholders can call members of the Advisory Group to provide input, or contact Clark or Beverly Benson directly, see handout for contact information.
      - i.e., what would you like to see included in the development process

**Question XIX:** Does this training apply to non-transient non-community water systems? For example, an Industrial public water system?

**Answer XIX:** Transient non-community water systems are excluded due to lack of requirement for operators.

- Computer Training: (See back of brochure) Coupons are used to reimburse training providers when operators complete required or elective water courses. Operators use coupon training to obtain, renew, or upgrade a license.
  - training is paid for when operator is from eligible water system
- Cluster Training: (See brochure)
  - onsite training for group of water systems.
  - Example module: Disinfectant monitoring for 3 hour module
  - Example module: Well operation level and maintenance training
  - 4 - 5 water systems: 8 - 12 operators: 3 - 4 modules covered in 1 - 2 day training
  - Cluster of water systems with similar issues of concern or areas of need.
  - Contract pays for licensing as well
- Amarillo to host TSPWSTP at Texas Water Utilities Association Annual School kick-off.

## CLUSTER TRAINING

**What is cluster training and why do I need it?**  
Cluster Training applies the concepts taught in the classroom to the daily operations of a PWS. For example: In the classroom, an operator learns the concept of disinfection and regulatory requirements for disinfection. During hands-on cluster training, operators establish and follow a sampling plan, setup and adjust disinfection equipment, test for chlorine residuals, and take bacteriological samples. Continuing Education Unit (CEU) credits can be earned for cluster training.

**There is no fee for cluster training for operators from eligible systems.**

**How is cluster training organized?**  
Small water systems or the trainers organize a cluster. A cluster is:

- One to six eligible PWS in close proximity
- PWS are similar in size and operation.
- A total of 8 to 12 operators (from all systems) participate.

**Contact nearby systems to organize a cluster in your area.**

**Do you need a classroom for cluster training?**  
No, but you will need a place to meet. Cluster training modules are conducted in the field.

**Will I have to travel far to participate?** No, cluster training keeps operators at their systems where they can perform their regular duties while completing the training modules.

**Who will conduct the training?** Approved training providers selected through a proposal process conduct cluster training. The selected trainers will be familiar with PWS operations and will use training modules developed specifically for this program.

**When will cluster training start?** Clusters can organize from October 2004 to December 2006. Cluster training begins as early as January 2005.

**Who do I contact to schedule cluster training?**  
Until cluster trainers have been selected, contact the contract administrator about organizing and scheduling a cluster in your area. Additional information on clusters will be provided by the end of October 2004.

## TECHNICAL INFORMATION

**How do I get technical information?** A Texas Small Public Water System Training Program website is in development and will be available in the near future. The website will include documentary videos, instructional videos or CDs, links to training providers, links to EPA, links to TCEQ, and others.



Offered in Cooperation

with the

Texas Commission on

Environmental Quality

and U.S. Environmental

Protection Agency



**This training program is funded by a grant from the U. S. Environmental Protection Agency (EPA) to the Texas Commission on Environmental Quality (TCEQ).**

The Safe Drinking Water Act authorizes EPA to reimburse the costs of training and licensing of persons operating community (C) or non-transient noncommunity (NTNC) public water systems serving 3,300 persons or fewer.

**Who is eligible for benefits of the Texas Small Public Water System Training Program?**

Operators of small community or nontransient noncommunity public water systems serving 3,300 persons or fewer are eligible.

**A Public Water System (PWS)** is a system for the provision of piped water for human consumption. Such a system must have a potential for at least 15 service connections or serve at least 25 individuals at least 60 days out of the year.

**A Community Water Supply** is a PWS which has a potential to serve at least 15 residential service connections on a year-round basis or serves at least 25 residents on a year-round basis. A common example is a small city.

**A Nontransient Noncommunity Water Supply** is a PWS that is not a community water system and regularly serves at least 25 of the same persons at least six months out of the year. An example is a rural business with its own water supply that serves 25 or more full time employees.

**Who is NOT eligible for benefits?** Water systems and water wholesalers serving more than 3,300 persons. Transient noncommunity (TNC) water systems are not eligible for this grant. Transient noncommunity water systems include campgrounds, convenience stores, and rural restaurants.

If you need assistance in determining eligibility, please contact us at (877) 822-5349.

**How do I register for this program?** Register by completing and returning (mail or fax) the enclosed enrollment forms to the contract administrator. Operators of eligible water systems will receive identification cards. The identification card confirms the water system's participation in the program.

**Contact**

Beverly Benson  
Texas Small Public Water System  
Training Program  
2300 Kent Street  
Bryan, TX 77802-1935  
(877) 822-5349 (toll free)  
(979) 822-8567 (fax)  
cbenson@engitech.com

## SERVICES PROVIDED

- Classroom Training – "Coupon Training"
- Hands-on, On-site – "Cluster Training"
- Technical Information
- Licensing fees paid beginning Oct. 2004

**What types of training are offered?**

*Coupon training* is for courses used to obtain, upgrade or renew a water license.

*Cluster training* is hands-on training that develops the skills required to properly operate and maintain a small PWS.

**How long will this program last?**

At least until June 2007.

**Are there limits to the services provided?**

Yes, there are limits to the program. However, at least two operators per system will receive the benefits. More training can be provided when needed.

## COUPON TRAINING

Coupons are used to reimburse training providers when operators complete required or elective water courses. Operators use coupon training to obtain, renew, or upgrade a license.

Fees for the courses listed below are reimbursed by the program. There is no fee for coupon training for operators from eligible systems.

**Required Courses:**

- Basic Water Works Operation
- Water Distribution
- Groundwater Production
- Surface Water Production 1
- Surface Water Production 2 (when available)

**Elective Courses:**

- Water Laboratory
- Water Utility Safety
- Water Utility Calculations
- Pump and Motor Maintenance
- Chlorinator Maintenance
- Valve & Hydrant Maintenance
- Water Utilities Management



## **Stakeholder Updates & Issues:**

**Water Vulnerability Assessments During Military Deployments:** Major Brian Sassaman, Randolph Air Force Base, Department of Defense (DOD).

Major Sassaman presented slide show on DOD effort to implement security/potability of deployment site water supply to insure adequate infrastructure for those to follow. Presentation was thoughtfully presented and very well received on a timely subject matter.

**Texas Rural Water Association (TRWA):** Tom Duck, General Manager

- Reorganization Plan
  - Ken Petersen, new Deputy Executive Director, and General Counsel
- Awarded Financial Managerial & Technical Capacity Development contract for 2005 - 2007
  - Bread and butter of what TRWA is all about, helping small public water systems.
- Upcoming Conferences / Training
  - October / November . . . Fall Management Conference
    - Management Issues
    - Training to small public water systems
  - January 25 - 26, 2005 . . . Law Conference (Texas Water Conservation Association)
    - Certificates of Convenience and Necessity
    - Legislative updates from Senate / House Committees
- And more, check TRWA website at [www.trwa.org](http://www.trwa.org)

**City of Austin:** Charlie Maddox, Manager, City of Austin Water Department.

- Water Conservation Task Force Meeting: September 15, 2004
  - Issues of concern
    - Recommend review of pending legislation on Texas Water Development Board website.
      - [www.twdb.state.tx.us](http://www.twdb.state.tx.us)
    - Proposed caps on gallons per day per capita (GPDPC)
      - 150 GPDPC
      - 50 GPDPC indoor use
- American Water Works Association (AWWA) Teleconference, Omni Hotel, September 28 - 29, 2004
  - City of Austin supported webcast

### **Guest comments:**

- Recommendation to keep an eye on draft legislation pertaining to implementation of Best Management Practices (BMPs) recommended by the TCEQ in the SWSAs. May become a requirement that water system implement recommendation contained in the report. Regulatory compliance monitoring to be performed by the TWDB or the TCEQ.
- Good Health Company (GHC) provides seminars for communities and townships on potable water filters, bottled water alternatives. GHC will send e-mail brochure to DWA WG member list. Example, fluoridation, what to do when . . . , How or when to boil water, emergency care for water systems. Website is to be up shortly @ [www.thegoodhealthcompany.com](http://www.thegoodhealthcompany.com) .

### **Additional seminars, meetings, or event notices announced:**

- February 11, 2005 Seminar.
  - Derailing rule petition raised by Houston area
- Water Protection Seminar
  - AWWA Water Sustainability: November 4, 2004
  - Alternative Treatment Process in the Distribution System : December 3, 2004

- Texas Water, Moody Gardens, Galveston, TX., April 4 - 8, 2005
- Community Resolution Group
  - Federally funded for small rural water and wastewater utilities.
- WHEAT Conference, Joe C. Thompson Center, September 21, 2004: Water reuse and environmental controls issues.
- Association of State Drinking Water Administrators (ASDWA) Annual Conference Hyatt Regency, Austin, TX., October 4 - 6, 2004.
  - EPA, top national water organizations, and state drinking water administrators

Next DWAAG Meeting:

- December 7, 2004
  - Texas Commission on Environmental Quality  
12100 Park 35 Circle, Bldg F, Rm 2202  
Austin, Texas
  - 9:00 a.m. to 12:00 p.m.