

6. REQUESTING A CPE

ATTENTION SWMOR2 USERS

Since you are monitoring CFE turbidity levels instead of IFE turbidity levels, we require you to request a comprehensive performance evaluation based on your CFE readings instead of your IFE readings.

Because the monitoring location for your plant would be the principal difference between the two sets of instructions for SWMOR and SWMOR2 users, this chapter applies to all surface water treatment plants.

If your filters intermittently produce water with an extremely elevated turbidity level, you must participate in an intensive, thorough evaluation called the mandatory comprehensive performance evaluation, or mCPE. This mCPE must be conducted by a third party, that is, a team of individuals who are not employees of your water system. Usually, the mCPE will be conducted by our staff.

You only have to participate in the mCPE if *two consecutive* 15-minute IFE turbidity readings are above 2.0 NTU on two separate occasions during any two consecutive months. For example, you would have to participate in an mCPE if either of the following situations occurs:

1. The IFE turbidity level at the outlet of Filter No. 4 was above 1.0 NTU on August 3 and Sept. 20.
2. The IFE turbidity level at the outlet of Filter No. 1 was above 2.0 NTU on March 20, and the turbidity level at the outlet of Filter No. 8 was above 2.0 NTU on April 30.

As our examples above suggest, there are several different combinations of events that can trigger an mCPE. In order to help you comply with the rules, the SWMOR spreadsheet automatically determines if you need to undergo an mCPE. To initiate the process of getting an mCPE, you must prepare and submit a CPE-request form. An example of a completed CPE-request form is shown in Appendix I.

If your water system serves 10,000 people or more, the mCPE must be conducted within 90 days of the second reading above 2.0 NTU. If your system serves fewer than 10,000 people, there is a 120-day deadline. In either case, you should fax us a copy of the request form as soon as you get the second reading. Once we receive your request, we will contact you to schedule the mCPE.

During the mCPE, a team of trained evaluators will review the design, operation, maintenance, and administration of your treatment plant. The purpose of the CPE is to identify factors that limit the ability of your facility to produce high-quality drinking water. Once the CPE team has completed the evaluation, they will prepare an mCPE Report. Copies of the report will be submitted to both you and us.

If we conduct the mCPE, we will prepare a corrective-action plan (CAP) that sets forth the improvements you must make and a compliance schedule for making them. Usually, you will have the opportunity to review and comment on a draft of the CAP before we issue it.

If a third-party contractor conducted the mCPE, we will notify you of the factors which you must address in a CAP after we review the mCPE Report. You must then prepare a CAP describing the improvements that you propose to make and providing the schedule for making them. You must then submit the CAP to us for review and approval.

IMPORTANT

If you fail to prepare an acceptable CAP following an mCPE, or if you fail to meet the approved improvement schedule it contains, we are required by federal regulations to initiate an enforcement action against your system. In this regard, the CAP that results from an mCPE differs from any corrective-action plan that you prepare after a filter assessment. The improvement plan prepared after a filter assessment is not required by state or federal regulations and, barring other regulatory violations, it is unlikely that an enforcement action will result from failing to prepare or implement such a plan.

6.1 PLANT AND OPERATOR INFORMATION

Public Water System Name

Enter the name of your public water system. The water system name shown on the SWMOR and the one you enter on the CPE-request form must be identical.

PWS ID No.

Enter your water system's seven-digit PWS ID number.

Plant Name or Number

If your water system has more than one treatment plant, enter the name of the treatment plant that collected the data contained in this specific report. You do not have to complete this blank if your water system has only one treatment plant. Again, to avoid confusion, please make sure that the plant name shown on the SWMOR matches the one you enter here.

Signature

After the completed CPE-request form has been printed, a senior official of the water system must sign the bottom of the form. This individual may be:

- The operator who is in charge of the entire treatment plant. This operator may or may not be the same person who is responsible for the daily operation of the plant. Consequently, the individual who signs the CPE-request form may or may not be the same person who signs the SWMOR.
- The utilities director, general manager, or similar water-system official. Since the mCPE process will involve senior water-system officials, it may be useful to have the form signed by a water-system official rather than the operator who is in charge of the plant.

Do not forget that the signature must be handwritten in ink. Stamped signatures and typewritten names are not acceptable.

Name (printed)

Type the name of the individual who is signing the CPE-request form.

License No. and Class

If the person who is signing the form is a licensed water-works operator, enter the license number and the type of license held by that person. If the individual who signs the CPE-request form does not hold a license, you may leave the line blank or enter <NA>.

Date

Enter the date the form was signed.

6.2 EVENTS THAT PROMPTED THE CPE REQUEST

This portion of the CPE-request form identifies the events that prompted you to request a CPE, and provides us with some background information on what steps you might have already taken in response to poor filter performance.

Filter Number

Enter the number of the filter that produced two consecutive 15-minute turbidity readings above 2.0 NTU. You must enter the number of the filter as it appears on page 3 of the SWMOR—for example, Filter No. 6. We realize that this filter number may not correspond with the numbering system you use at your plant, so we have left enough space for you to add some information if necessary. For example, if Filter No. 6 corresponds to your Filter 3-West, the completed form might look like this:

FILTER	
NUMBER:	<u>Filter No. 6 (our Filter No. 3-West)</u>

Date of Event

Enter the date when the event occurred.

FAR Prepared?

Using the drop-down list, tell us whether you have completed a filter-assessment report for the filter.

CAP Prepared?

Using the drop-down list, tell us whether you have an approved corrective-action plan for the filter.

6.3 PUBLIC WATER SYSTEM PREFERENCES

This portion of the CPE-request form provides us with some information to help us schedule the CPE at your plant.

Preferred Dates for the CPE

Identify the weeks that would be most convenient for us to conduct the CPE. When you select the dates, be aware of the following requirements:

- If your plant serves 10,000 people or more, the CPE must be conducted within 90 days of the second event that prompted the request.
- If your plant serves fewer than 10,000 people, the CPE must be conducted within 120 days of the second event that prompted the request.
- Key plant personnel must be available during the CPE. These people include the plant superintendent, chief operator, each shift supervisor, and most of the operators.
- Key administrative personnel must be available during the CPE. These people may include the public works director, utilities director, mayor, district president, owner, and financial officer. Whatever their titles, the people with responsibility for high level planning and decision making must be available.
- If capital improvements are planned, the water system's engineer must be available during the CPE.

Contact Information

You must supply us with some critical information about the individuals that you want us to contact when making arrangements for the CPE.

Administrative Contact

The administrative contact will usually be the mayor, chief administrator, utilities director or similar individual who can help us schedule administrative interviews and can make sure that all of the necessary financial and administrative information is compiled before our arrival. You can see who we have on file as the administrative contact on the Web, at Texas Drinking Water Watch:

dww.tceq.texas.gov/DWW/

You can update this and other information related to the points of contact for your system and plant by calling the Public Drinking Water Section at 512-239-4691 and asking for a member of the inventory group, or by e-mailing <PWSINVEN@tceq.texas.gov>.

Plant Contact

The plant contact will usually be the plant superintendent or similar individual who can make sure that the plant staff will be available for the CPE and compile the plant schematics, the engineering plan and specifications, and the operational and maintenance records that we will require during the CPE.

Name

Enter the full name of the administrative and plant contacts.

Title

Enter the title of the position that the contact holds at the public water system. For example, the title could be the water and wastewater utilities director or surface water treatment plant manager.

Phone**Fax**

Enter the telephone number and, if applicable, the fax number for each of the individuals.

Address

Enter the mailing address for each of the individuals. If the mailing address for the administrative and plant contacts are identical, you may enter <Same> on the first line of the address for the plant.

6.4 SUBMITTING THE REQUEST

The completed and signed CPE-request form must be included when you mail your SWMOR to the TCEQ. A copy should also be faxed to the Technical Review and Oversight Team as soon as possible to increase the time available to complete the CPE.