

Texas Commission on Environmental Quality Cross-Connection Control Subcommittee

September 5, 2019

Building F, Room 2210

Time: 9:00 – 3:00

Note: This draft meeting summary is posted for review and comment by meeting attendees. It will be available for comment at the next meeting of the TCEQ Cross-Connection Control Subcommittee at which time it will be voted on for adoption.

Draft Meeting Summary

Commencement

Mr. Charlie Middleton

The meeting commenced on time with the general announcements and introductions by meeting participants.

The motion was then made to adopt the meeting summary. A second to the motion was heard and the vote to adopt was unanimous.

The next meeting of this Subcommittee will be held on December 5, 2019.

Update from Cross-Connection Control Program

Mr. Charlie Middleton

Mr. Charlie Middleton, TCEQ Cross-Connection Control Program, provided an update on this program.

Cross-Connection Control Program surveys have continued at public water systems that have been identified by TCEQ regional investigators as benefitting from this form of technical assistance. Approximately 30 surveys were conducted over the summer, focusing on the Dallas/Fort Worth, Abilene, and San Angelo regions. A new list of survey candidates is currently being arranged. Suggestions for systems to receive surveys can be submitted to the TCEQ for issues such as: staff turnover, customer complaints, a lack of a Cross Connection Control Program, and others.

Mr. Shannon Frazier, TCEQ, recently left the Cross-Connection Control Program. Ms. Katherine McGlaughlin is now the Program Coordinator and TCEQ contact for this program.

Update from Landscape Irrigation

Mr. Al Fuentes

Mr. Al Fuentes, TCEQ Office of Compliance and Enforcement, provided an update on the Landscape Irrigation Program (LIP).

The program is currently replacing a member on the Irrigation Council. The LIP continues to receive a high volume of calls and emails. Calls and complaints continue to get more complex and specific to a system.

IAC Rule Petition

Mr. Al Fuentes

Mr. Al Fuentes also provided an update on the IAC rule petition. All landscape irrigation rules have been thoroughly reviewed and the LIP is dealing with the new rules now.

Preamble language to the rule is being worked on by Mr. Fuentes. The rule language is set to be sent to the Office of Legal Services for review. At this time, the proposal is set to be completed by January 15, 2020. The public comment period will be open from January 31, 2020, and will end on March 3, 2020. The proposed adoption date following the public comment period is set for July 7, 2020.

Update from Occupational Licensing

Ms. Tamara Calhoun

Ms. Linda Saladino and Ms. Tamara Calhoun, TCEQ Occupational Licensing (OL), provided an update from the OL section.

OL discussed BPAT and CSI experience considerations and the process for licensing. Current rule language allows for laying water lines and water sampling to count as experience, although this does not pertain to maintain nor controlling backflow. Language changes in the rules were proposed to narrow this from the 2 years of Water Experience requirement. OL has thoughts about opening rules, but there are no immediate changes forthcoming.

Current listed qualifications related to the 2-years of Water Experience requirement include:

- Disinfection;
- Pressure adjustments;
- Inspecting the distribution system;
- Identifying and correcting hazards; and
- Operating/maintaining potable treatment.

Smart Metering AMI

Mr. Byron Hardin

Mr. Byron Hardin, Hardin & Associates Consulting, LLC, presented information on Advanced Metering Infrastructure (AMI).

AMI refers to the system of digital smart meters, data management systems, and communication between customers and utilities. These systems offer advantages over traditional meters, including the ability to automatically detect tampering, identify outages, or track daily consumption. Another advantage to using smart meters is that backflow can be detected and communicated to the utility immediately.

This smart technology and quick communication create new challenges for responding to backflow incidents. Water purveyors should research and identify actions levels: what level of flow generates a backflow response? What is an appropriate level of response? Reference materials to make this determination include reviewing rates and flow history. At this time, there is no guidance from manufacturers on backflow response. TCEQ does not have a set rule that defines a backflow event that is triggered by a certain number of gallons.

Working Lunch Discussion

Directed Assistance Module (DAM) 12 through the TCEQ's Financial, Managerial, and Technical (FMT) Assistance Program was recently approved for Continuing Education Units (CEUs). 8 hours of CEUs are available to licensed Customer Service Inspectors and Backflow Prevention Assembly Testers. For more information or to sign up for DAM 12 training, contact the TCEQ.

The matter of bench testing was discussed by the Subcommittee. Bench testing is when a backflow prevention assembly is removed from its original place of service, tested on a separate line, then reinstalled. This practice does not ensure pressure and conditions remain the same on the original

water line. It was discussed that if an assembly is moved and changes address, it would need it to be retested. Bench testing is not permissible in the State of Texas.

Possible Topics for Next Meeting

Suggested topic for the following Subcommittee meeting were discussed. The Subcommittee members discussed license suspension, and whether the responsibility lies on the TCEQ or public water supplies to enforce. A talk regarding whether water service should be stopped due to a failed assembly test occurred. TCEQ leaves the decision and judgement to the public water supply. New digital test kits to test backflow prevention assemblies are in development. These include a new test kit, a phone app, and tie-ins with recordkeeping software. As more tests are conducted and cross connection control programs expand, new technologies may be beneficial to tracking and testing assemblies.

Group Discussion: Paperwork 101

Mr. Charles Middleton

The TCEQ Cross Connection Control Program frequently receives questions on filling out Form TCEQ-20699 (Customer Service Inspection Certificate). The Subcommittee was given the questions: how do we teach to Form TCEQ-20699? And how can the TCEQ make it easier understood?

It was noted by Subcommittee members that there is not enough training in the 10-hr Customer Service Inspection (CSI) course. Every line item is required to be filled out and tested before delivering the form to the water purveyor. Properly filling out the CSI form is a topic that needs to be addressed in the 10-hr CSI course. It was determined that an improperly filled out CSI form with missing/incorrect information may result in a violation for the water purveyor. Overall, certain licensed customer service inspectors are lacking in their understanding on correct CSI practices, thus resulting in common form issues.

The Subcommittee explored ideas on addressing the CSI training shortcomings. The Subcommittee identified a need for better supplemental training, with a focus on real life applications. This could be delivered through affordable, online classes taught in tandem with the current 10-hr CSI course. Recalling, revising, and reapproving the currently approved training would involve a lengthy rule making process.

To address these shortcomings, a CSI Training Workgroup was established to discuss additional training ideas and improvements.

Porch Potty

Mr. James Garvin

Mr. James Garvin, New Braunfels Utilities (NBU), introduced a discovered product that may pose as a hazard to distribution facilities.

The device uses an automatic sprayer connected to a hose to wash animal wastes into a receptacle. A direct cross connection between the product and waste was identified. It was deemed that a functioning hose bibb vacuum breaker would be sufficient protection to protect from back siphonage on this product.