

Texas Commission on Environmental Quality

Cross-Connection Control Subcommittee

September 6, 2011

Meeting Summary

Welcome/Introductions/Announcements:

- The next subcommittee meeting will take place December 6, 2011. This will be a **special meeting** to discuss proposed revisions to the rules for drinking water, Title 30 of the Texas Administrative Code, Chapter 290. **We invite you to come to this meeting if you have an interest in the implementation of rules related to rainwater harvesting.**

Vote to adopt minutes from last meeting:

The meeting summary from the June 7, 2011 meeting was adopted. A question was raised by Mr. Robert Cross concerning the issue regarding employment requirements for licensed backflow prevention assembly testers raised by Mr. Buddy Heuberger. TCEQ staff told Mr. Cross that they would address his concern. The following change in italics was made to the meeting summary.

~~Since backflow prevention assemblies are classified as appliances, the test and repair of a backflow prevention assembly does not qualify as performing plumbing and does not require one to be a licensed plumber. Per an agreement between the Texas State Board of Plumbing Examiners and TCEQ's predecessor agency, licensed Backflow Prevention Assembly Testers do not need to be licensed plumbers and are authorized to test assemblies and repair assemblies in-line.~~

Rainwater Harvesting/TCEQ Rule Package

Mr. Elston Johnston, Manager, TCEQ Public Drinking Water Section, gave an update on the process of developing rules for Rainwater Harvesting (RWH). Three bills that address RWH, HB3391, HB3372, and SB1073 passed in the last legislative session. Rules will be developed to address the following requirements of the bills:

- If rainwater is to be used for potable purposes, then it must meet drinking water standards.
- If a residence/facility is connected to a public water supply and wishes to harvest rainwater for potable purposes, then a representative for the residence/facility must notify and obtain consent from the Public Water Supplier.

- If a residence/facility is connected to a public water supply and wishes to harvest rainwater for potable purposes, the individual who installs the system must be a licensed plumber who holds a Water Supply Protection Specialist endorsement.
- There must be adequate backflow and cross-connection control measures in place.

There will be 3 upcoming stakeholder meetings to obtain input on the RWH Rules. They will take place on October 25th, December 6th, and January 24th. Notification for these meetings will be on the TCEQ website.

Some topics to be discussed at the stakeholder meetings are:

- Requirements for installers of RWH systems;
- Requirements for designers of RWH systems and distinguishing RWH System designers from installers; and
- Will a licensed plumber be able to install a RWH system?

New Requirements for WSPS and Rainwater Harvesting

Mr. Bob Maxwell, Executive Director of the Texas State Board of Plumbing Examiners (TSBPE), spoke on a bill that impacts requirements to obtain the Water Supply Protection Specialist (WSPS) license in regards to rainwater harvesting. Mr. Maxwell stated that currently the WSPS license requires passing a 24hr course which covers backflow prevention and conservation. The WSPS test for a Master Plumber is not the same as the test for a Journeyman Plumber. Mr. Maxwell stated that currently there are approximately 10,000 Master Plumbers licensed with the TSBPE and 18 – 20,000 Journeyman Plumbers. Of these, approximately 1,000 hold or are eligible for WSPS licenses. As demand for the WSPS endorsement increases as a result of the new rainwater harvesting requirements, so will the number of WSPS endorsement holders. The TSBPE is currently waiting to see what the TCEQ Rainwater Harvesting regulations will be before making changes to the curriculum for the WSPS license.

Recap of Drip Irrigation Systems and Chemical Additives

Mr. Al Fuentes, TCEQ Cross-Connection Control Program, was asked to revisit the issue of the hazard posed by drip irrigation systems and the chemicals used in them to prevent root intrusion. The following points were made in the general discussion:

- Any strip of land less than 48 inches (usually the area between the street curb and the sidewalk) cannot use above ground spray emission devices. In order to irrigate this, the irrigator would most likely resort to drip irrigation.
- Drip irrigation systems can pose a health hazard because of chemical means of root inhibitors. The water purveyor should be aware when drip irrigation systems are installed and should check to see what method of root inhibition is used. Drip irrigation systems which use chemicals to inhibit root intrusion qualify as health hazards and require the appropriate backflow prevention assembly and annual testing of the assembly.

Fire Lines and Backflow Prevention Assembly Testing

Mr. Byron Hardin, Hardin and Associates Consulting, LLC gave a presentation on fire lines and backflow prevention assembly testing. Mr. Hardin pointed out that in the 2011 edition of the National Fire Protection Association's fire code, under section 4.1.1 *Responsibility for Inspection, Testing, Maintenance, and Impairment, the property owner or designated representative shall be responsible for properly maintaining a water-based fire protection system.* If there is no local jurisdiction, then the property owner is the person responsible for their water-based fire protection system. Mr. Hardin went on to say that a Fireline Contractor is allowed to install a Backflow Prevention Assembly per Sec.6003.151(a) of the Texas Insurance Code.

Mr. Hardin also highly recommended that a fire sprinkler inspection and a backflow prevention assembly test should go hand-in-hand. Every time the backflow preventer is tested, the whole fire sprinkler system should be inspected and vice-versa.

Fire Line Regulations and Maintenance

Mr. Josh Lambert, State Fire Marshall's Office, gave a presentation on fire line regulations and maintenance. Mr. Lambert described a system of colored tags which are used to indicate the status of the fire sprinkler system and of the testing of the backflow preventer. Mr. Lambert stated that a "forward flow test" has been added to the testing of a backflow prevention assembly test. He further expressed a need to inform the local Fire Marshall when a backflow prevention assembly installed on a fire sprinkler system does not pass the test.

Navigating Your Utility Infrastructure with Tracer Wire Infrastructure

Mr. Jim McCain, McCain Waterworks, gave a brief presentation on detecting the location of water lines using a color-coded wire system which would be installed underground along the pipeline with access points at pre-determined distances. A leaky water line poses a potential contamination hazard should a backflow event occur. Being able to locate that water line quickly and accurately makes repairing that leak easier. This technology is also used to indicate where a water line is before digging into the ground.

Distribution System Optimization

Mr. Steven Sweirenga, TCEQ Drinking Water Quality Team, gave a presentation on Distribution System Optimization. Mr. Sweirenga provided the following optimization process which could also be used to optimize a Cross-Connection Control Program:

- Set a goal
- Determine where you're at in relation to the goal.
- Determine what factors are keeping you from that goal.
- Address those factors.
- Meet your goal.

Other topics for discussion:

The issue of Carpet Cleaning Vans connecting to a potable water system in order to mix the cleaning chemicals was raised. If a direct connection is made, then there is a high potential for those chemicals being siphoned into the potable water distribution system should a backflow event occur. It was determined that the majority of these connections use an air gap when mixing the chemicals.

If you have any questions, please contact Al Fuentes by email at Alfonso.Fuentes@tceq.texas.gov or by phone at (512) 239-1407.