

TCEQ Cross-Connection Control Subcommittee

June 5, 2013

Building F, Room 2210

9:00 am - 2:00 pm

Meeting Summary

Announcements & Introductions:

- Mr. Kenny Dykes, TCEQ Cross-Connection Control Program opened the meeting with introductions of those attending.
- A Motion was made to approve minutes from Mar. 6th meeting as-is, a second motion was heard and the vote was in favor of adopting the minutes. The minutes will be posted to the TCEQ Website.
- Mr. Kenny Dykes discussed the contents of his Cross-Connection Control presentation which he will give at the Public Drinking Water Conference being held in Austin on August 6th and 7th. For more information on the conference please go to: <http://www.tceq.texas.gov/drinkingwater/conference.html>

Key Revisions to RG-206, “A Public Water System Guide to Customer Service Inspections.”

Mr. Kenny Dykes proposed revising RG-206 to address the following issues:

- Who can perform a Customer Service Inspection (CSI)?
- The inclusion of a CSI in a comprehensive plumbing inspection. Is the lead test captured?
- In light of a Plumbing Inspector or a Water Supply Protection Specialist being qualified to conduct CSIs, are there any situations where using a form other than the official CSI form is acceptable?
- How critical is a CSI and the record keeping requirement to a Public Water Supplier’s Cross-Connection Control Program?
- Is a CSI required when installing an irrigation system?
- Should there be any exemptions to conducting a CSI?
- When is a CSI reinspection needed? Once a CSI has been conducted, then when should another be conducted?
- Is electronic record keeping an option for CSI forms?
- A workgroup must be formed to revise RG-206.

Inspection of Atmospheric Vacuum Breakers (AVB)/ Changes to 290.47 (f)

The TCEQ's Backflow Prevention Assembly Test and Maintenance Report (BPAT form) does not provide for the inspection of AVBs or the recording of the observations made during the inspection.

- Changing the form is an option but, would prove challenging.
- The option to use training opportunities should be used to educate Backflow Prevention Assembly Testers (BPATs) on the importance of inspecting AVBs to make sure they are working.
- Is there an approved method for inspecting AVBs? If not, what effect does this have on a BPAT recording his results?
- Can AVBs be excluded from being used on health hazards?
- Is inspecting AVBs required by rule?

Rainwater Harvesting Rules

The rainwater harvesting rules are addressed in House Bill 2781. HB2781, on the day of this meeting, was on the Governor's desk for signature. Changes made to the bill will require the current rule package to be revised, or be dismissed and start over. Currently, the bill requires appropriate cross-connection control if the establishment is also connected to a public water supply.

Topics for Upcoming Meetings

- Homeland Security Issues for water purveyors and backflow prevention.
- Infrastructure deficit by 2030
- Center for Disease Control (CDC) requirements for recording and tracking communicable disease outbreaks.
- Swimming pool backwash and filtering systems
- Testing for accuracy of gauges used to test backflow prevention assemblies

Key Revisions to RG-478, "Establishing and Managing an Effective Cross-Connection Control Program." Internal Protection vs Containment

Mr. Kenny Dykes proposed revising RG-478 to clarify the following issues:

- Do the regulations support a requirement for internal protection?
- In regard to backflow prevention, what responsibilities does a Public Water Supplier (PWS) who serves a rural area where they are not required to adopt a plumbing code have in preventing backflow downstream of the meter?
- Many recommendations were made for changes to RG-478.

Many of the questions raised during this meeting required input from the TCEQ's Environmental Law Division. Members of the TCEQ's Cross-Connection Control Program along with input from this Subcommittee will contact the Environmental Law Division regarding the issues discussed at this meeting. Further discussion on the agenda topics for this meeting will be held during upcoming Cross-Connection Control Subcommittee meetings.