Texas Commission on Environmental Quality
Cross-Connection Control Subcommittee
September 3, 2020
Microsoft Teams Webinar
Time: 9:00 – 12:30

Commencement — Ms. Katherine McGlaughlin

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 3, 2020.

Update from Cross-Connection Control Program — Ms. Katherine McGlaughlin

Ms. Katherine McGlaughlin, TCEQ Cross-Connection Control Program, provided program updates.

Cross-Connection Control Program surveys continue at public water systems that have been identified by TCEQ regional investigators as benefitting from this form of technical assistance. At this time, there are 4 candidates identified that would benefit from program surveys. 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. Upcoming surveys will be done remotely through Microsoft Teams.

The program conducted a presentation to TCEQ Wastewater Investigators on Cross Connections at Wastewater Treatment Plants, with a focus on backflow prevention assemblies and the use of reduced pressure principle backflow prevention assemblies. In addition, Ms. McGlaughlin conducted a presentation to the Mickey Leland Internship program in conjunction with the FMT and At-Risk programs. The presentation introduced interns to cross connection control and common backflow hazards.

Mr. Peter Reitmeyer, Contractor with University of Texas at Arlington joined the Response and Capacity Development Team in August 2020. He will be assisting with the Cross-Connection Control Program and the Financial, Managerial, and Technical Assistance program.

Regulatory guidance (RG) documents are in the process of being revised. The program will be reaching out to the previously established RG revision teams.

Mr. Charles Middleton, TCEQ Cross-Connection Control Program, provided follow-up information from a previous meeting topic towards the end of the meeting. Previous meeting discussions revolved around certain testers utilizing nonpotable gauges on potable lines that led to fire suppression systems. Certain testers are teaching that stagnant water downstream of a backflow prevention assembly supplied by potable water requires the use of a nonpotable gauge. Stagnant water is undesirable but remains potable water. The program is drafting an email in tandem with the TCEQ Occupational Licensing section to clarify TCEQ's rule requirements and to discourage the use of nonpotable gauges on potable water lines.

Update from Landscape Irrigation — Mr. Peter Abel

Mr. Peter Abel and Ms. Chelsea Atkinson, TCEQ Office of Compliance and Enforcement, provided an update on the Landscape Irrigation Program (LIP).

The LIP continues to receive a high volume of calls and emails. Specifically, the program fielded 11 new complaints focused mainly around Central Texas and metropolitan areas. Mr. Abel stressed the importance of utilizing Landscape Irrigation General Complaint Form (TCEQ Form 10380). The form streamlines the investigation process and provides information regarding the complaint process. TCEQ Form 10380 is available on the TCEQ LIP website or directly at:

- www.tceq.texas.gov/assets/public/compliance/compliance_support/regulatory/irrigation/forms_li/10380.pdf

Ms. Chelsea Atkinson also provided an update on the IAC rule petition. The rule petition was posted on the Texas Register and passed through the TCEQ Commissioner's Agenda. The rule changes went into effect July 23, 2020. Discussion on the IAC rule changes included:

- The labeling all irrigation systems as health hazards did not pass, though restrictions listed in Texas Administrative Code Chapter 290 remain in effect;
- Atmospheric vacuum breakers (AVBs) are no longer allowed in landscape irrigation systems;
- Removal of the requirement for a Y-type strainer before certain assemblies; and
- Language clarifications to bring 344 rule language to match 290, such as replacing "device" with "assembly" through the rule.

At this time, LIP staff is drafting a summary of the Texas Administrative Code Chapter 344 changes for the general public. The document is being reviewed by legal staff to ensure accuracy. The summary will be posted to the TCEQ Landscape Irrigation webpage once reviewed and approved. The rule package sent to the commissioner's agenda was shared with the Subcommittee for further reading.

Update from Occupational Licensing — Ms. Tamara Calhoun

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

In the 4th Quarter (June 1, 2020 - August 31, 2020), 102 new Backflow Prevention Assembly Tester (BPAT) license applications were received along with 527 renewal applications. Out of the 142 tests administered, 64 passed., resulting in a 45.1% passing rate. This brings the total number of BPAT licenses in the State of Texas to 5,526.

In the 4th Quarter, OL Received 48 new Customer Service Inspector (CSI) applications and 165 renewal applications. 52 tests were administered with 30 having passed, resulting in a 57.7% pass rate. This brings the number of total licensed CSIs to 2,101.

At this time, the OL Section is in the process of offering paper exams for licenses. Priority for students lies with those who have otherwise not had access to other forms of testing. The Section is focusing on other programs, including Petroleum Storage Tank and Wastewater licensees. For BPAT licenses, the 8 hours hands-on requirement may be waived for renewals through December, since hands-on requirement cannot be done remotely/online. At this time, there are 28 testing centers open across the State.

Ms. Jaya Zyman, OL Section, indicated the extension of 30 day through August was done to allow trainers to develop online classes, as at beginning of pandemic, few online classes were available. License extensions continue to be looked at on a case by case basis. The Subcommittee expressed appreciation for the OL Section for keeping the program afloat and active during the pandemic and work-at-home situations.

T&M Exercise Mrs. Alicia Diehl

Mrs. Alicia Diehl, Altamira Water LLC, presented training materials to the Subcommittee for review. She is currently revising Directed Assistance Module 12: How to Develop and Manage an Effective Cross-Connection Control Program for the TCEQ's Financial, Managerial, and Technical (FMT) Assistance Program. The Directed Assistance Module is a training program to assist public water suppliers develop a cross connection control program. The training materials for this meeting focus on identifying problematic BPAT tests to help train administrators and water supply personnel identify a bad or failing BPA test.

The trainer materials provide what each section of the BPAT form is for. Five sample forms are included in the exercise. Each sample form addresses a variety of issues for students to analyze, including test values, expired licenses, incomplete test results, and others.

. The Subcommittee provided feedback to improve the training materials:

- Ensure the most recent and correct approved form is used;
- Reviewers should develop a familiarity and basic understanding of how backflow preventers work;
- Address digital signatures, which are not acceptable;
- Utilize actual assemblies and information;
- Present results in decimal formant (ie, 5.0 and not 5); and
- Provide sample assemblies not approved by USC.

Failed Lead Testing: Follow-up to CSIs Group Discussion

Ms. Katherine McGlaughlin introduced the concerns regarding failed lead testing following CSIs. The TCEQ Cross-Connection Control program received customer calls seeking assistance with lead-positive CSIs,

Upon a failed lead test, it remains important to note that the Customer Service Inspector does not have the authority to grant or deny water service. This is the responsibility of the water purveyor, who must consider what options are available to rectify the situation, if any are available. Some options that a water purveyor may explore:

- Consider replacing lines that are feeding to home;
- Install a backflow prevention assembly on lead-positive homes for premises isolation;
- Determine if the wetted surface exposes water to lead, as an inner coating may prevent lead leeching;
- Document the presence of lead lines;

- Determine if remediation or replumbing is required at the connection;
- Incorporate the connection into the lead copper sampling program; or
- Identify any water quality changes that may impact lead leaching, such as corrosivity and pH.

Copper leachate, present in older home piping, remains a health hazard to the public water supply and deserving of attention. The Subcommittee inquired about a potential presentation from the Lead Copper program to explore the testing process. Alternatives and resolutions on how to best approach lead-positive testing may be explored to create guidance for future inquiring public water suppliers.

Hardin and Associates CSI Video — Mr. Byron Hardin

Mr. Byron Hardin, Hardin and Associates, presented the CSI walk-along video produced by Hardin and Associates Consulting, LLC. This presentation was first provided during the TCEQ Public Drinking Water Conference in August 2020.

The video supplements the 10-hour CSI course and provides examples of potential hazards an inspector may encounter during a residential Customer Service Inspection. Common potential hazards such as hose bibbs, irrigation systems, sinks, swimming pools and sources of lead are explored. Suggested tools for a successful CSI are presented, as well as personal protective equipment for CSIs conducted during the COVID-19 pandemic. Post-consumer products, including bidets reverse osmosis units, automatic pool fill valves, amongst others, are discussed as hazards to be aware of during a CSI.

The video remains publicly available for viewing:

- www.youtube.com/watch?v=5hMPkFMzzq8

New Backflow Prevention Assemblies — Mr. Brian Fiorisi

Mr. Brian Fiorisi, Test Gauge and Backflow Supply, provided a presentation to the Subcommittee on newly approved assemblies. New Deringer, Magnum, Wilkins, Watts, ARI, and Conbraco assemblies, as well as their uses and popularity, were discussed.

Following the presentation, Mr. Fiorisi provided a tour of USC's list of Approved Backflow Prevention Assemblies via Excel. Assemblies can be searched via lead content, approved orientations, approval sate, sizes, manufactures, types of shutoffs, etc. Special notices are tabbed off and easily searchable, in addition to manufacturer contact information. The list is updated quarterly with new and approved assemblies.

The most up-to-date Excel sheet is available on the USC's website:

- fccchr.usc.edu/list.html

Mr. Paul Schwartz, former USC employee, provided an additional tool to navigate through USC-approved assemblies. USC maintains an interactive website that immediately lists details on approved assemblies. This information is available at:

- www.usclist.com

Possible Topics for Next Meeting

Suggested topic for the following Subcommittee meeting were discussed. The Subcommittee members discussed receiving information from the TCEQ's Lead Copper Rule program to establish knowledge and guidance for lead-positive CSI tests.

Some Subcommittee members indicated concern regarding water haulers. The situation described indicated that concern that some kidney dialysis facilities are receive emergency potable water via Water Tanker Trucks with quick connect capability. A pump pushes water into facilities, which can create a backpressure situation. The program should consider reaching out to permitters to clarify backflow rules and restrictions on water haulers.