

Texas Commission on Environmental Quality Cross-Connection Control Subcommittee

December 5, 2024

Microsoft Teams

Time: 9:00 – 10:00

Commencement

Mrs. Katherine McGlaughlin

The meeting commenced on time with the general announcements, reminders, and introductions by meeting participants. This meeting was held virtually on Microsoft Teams.

The next meeting of this Subcommittee will be held on March 6, 2025.

Cross-Connection Control Program

Mrs. Katherine McGlaughlin

Mrs. Katherine McGlaughlin, TCEQ Cross-Connection Control Program (CCCP), provided an update on this program.

The TCEQ CCCP conducted one program survey in the San Antonio region this past quarter. Interested systems Program surveys are technical assistance visits where TCEQ sits down with the water supplier and go over the different elements of a CCCP and assess areas of improvement.

Since the previous subcommittee meeting in September, one new staff member has joined, University of Texas-Arlington (UTA) contractor Deborah Carballo. She is tasked with reviewing alternate form approval requests as they come in and is receiving technical training.

Mrs. McGlaughlin discussed a potential change to the backflow test and maintenance form to be presented in the near future. Since the last meeting, TCEQ's Texas Optimization Program (TOP) staff conducted two technical presentations and responded to one emergency response backflow event. One of the presentations was with the Department of State Health Services and the other presentation was an internal TCEQ presentation for new investigators.

Landscape Irrigation Program

Mr. Thomas Minucci

Mr. Thomas Minucci, from the Landscape Irrigation Program (LIP) provided updates.

LIP conducted two outreach trips, one to the San Antonio Irrigation Association and the second to the Houston Gulf Coast Irrigation Association. Irrigator Advisory Council (IAC) was able to fill membership slots and the new appointees are expected to start their time on the council in February.

IAC's next meeting for the new calendar year will take place on February 6, 2025. If anyone is interested in these meetings, it is highly encouraged for anyone to reach out to join. Investigations continue to be handled as they come in. The LIP asks if there are events, questions, or information that may be of interest to the program, they can be contacted at:

- install@tceq.texas.gov

Occupational Licensing

Mr. Paul Munguia

Mr. Paul Munguia with Occupational Licensing (OL) provided updates for occupational licensing. Mr. Munguia reports pass rates for the Backflow Prevention Assembly Tester (BPAT) test is 41% and for the Customer Service Inspector (CSI) test is 49%. There are currently 6,155 licensed BPATs, with 151 being new. There are also 2,309 licensed CSIs with 75 being new in the state.

Mr. Munguia mentions legislative bills that are being tracked, some from previous legislative sessions and some from the current legislative session, those bills are:

- [HB710](#)
- [HB1237](#)
- [HB794](#)

OL will be releasing the revised irrigator technician exam in January once it's finalized. OL will also be sending all the training providers for irrigation a revised addendum since there is new material on the exam. Lastly, the training search page on the website will also be updated in order to become more user-friendly and to reduce the amount of scrolling and make it easier to search for approved training.

Technical Manual Discussion

Mr. Paul Munguia

Mr. Paul Munguia's next topic involves an ongoing discussion to potentially review a new manual for testing and training. Currently, the TCEQ uses the University of Southern California's (USC) Manual of Cross Connection Control, 10th edition which has undergone extensive testing and review, and remains the industry standard.

The request is from the author of the submitted manual was told initially by the TCEQ that his manual contained several inconsistencies following a preliminary review. Therefore, the TCEQ's review was concluded per TCEQ rules [§30.28(n)(1)], which states that the TCEQ is not responsible for reviewing material with multiple mistakes. This responsibility belongs to the training provider and while the author has corrected some of the mistakes, he asks the TCEQ to continue the review process so that he can continue addressing the remaining inconsistencies. The author expressed concern with the low pass rates and believes his manual can be beneficial to trainers and can provide the opportunity to increase knowledge of testing. Mr. Munguia then opens the topic up for discussion to the Texas subject matter experts in attendance.

Mr. Byron Hardin provided background as to why the USC manual was adopted. In the 1990s at the beginning of TCEQ's CCCP, training protocols were open which allowed several manuals to be used which led to confusion. It was during this time that the TCEQ was looking for a process that would be standardized and bring everyone on the same page in terms of training and testing materials. Per industry experts, USC's manual is still considered one of the better methodologies.

Mr. Fred Baird mentions that in the past, many different test methods as well as their technical terminologies varied greatly, which is not suitable for consistency. Mr. Baird brings up the possibility of several manuals being used, it may lead to purveyors potentially challenging testers to demonstrate all methodologies. It is suggested that an subject matter expert group or a workgroup should be established that would look into and review new manuals being written. The goal is to not review for approval, but instead provide guidance and clarity on what the expectations are for a manual. After more discussion, the idea of a workgroup being established will be followed up on after the meeting. Subject matter experts who are interested in volunteering will need to have at least three years of hands-on experience as a backflow operator.

Other Topics of Discussion

Mr. Byron Hardin requested a fire suppression systems discussion during the next meeting. Mr. Kelley Stalder expresses interest in coordinating with Mr. Hardin and asks if there is a database where backflow incidents that are linked to fire suppression systems can be shown. There is no database that shows that, but Mr. Kelley will use other sources to investigate this information.