

From: [Susan Jablonski](mailto:Susan.Jablonski@tceq.texas.gov)
To: ATucker@killeentexas.gov
Cc: [Cari-Michel Lacaille](#); [David Van Soest](#); [Lori Wilson](#); [Michelle Harris](#); [Rosalind Stockton](#); [Richard Monreal](#); [OCE](#); [Steve Kana](#); [John Wiley](#); [Travis R. Ballard](#); [James Seeger](#)
Subject: RE: Enforcement Discretion Response - City of Killeen PWS
Date: Wednesday, March 25, 2020 9:38:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Alexander Tucker
Superintendent of Water and Sewer Department
City of Killeen
Killeen, Texas

Dear Mr. Tucker:

This is in response to your March 24, 2020 request regarding staffing and sampling impacts to the City of Killeen Water and Sewer Department resulting from the COVID-19 pandemic. You requested a 60-day period of enforcement discretion in regards to chemical analysis monitoring and nitrification sampling. The TCEQ Waco field office reviews monitoring required by Title 30, Texas Administrative Code (TAC) 290.110(c)(5) relating to chloramine effectiveness sampling. Due to the impacts of a reduced workforce in response to the COVID-19 pandemic, the TCEQ will exercise its enforcement discretion for the next 60 days for not conducting the monitoring required by the City of Killeen's Nitrification Actin Plan (NAP).

The TCEQ is aware that regulated entities may be experiencing an impact from a reduced workforce necessary to maintain normal operations at some facilities. Public water systems must take all available actions necessary to ensure compliance with state and federal regulations to minimize the risk of drinking water contaminants to protect public health and especially during the COVID-19 outbreak. Because public water systems are critical to public health and safety, water operators are essential personnel and should be prepared to address potential impacts to supply due to personnel interruptions related to COVID-19.

State and federal regulations have established treatment requirements for public water systems that prevent waterborne pathogens such as viruses from contaminating drinking water. COVID-19 is a type of virus that is particularly susceptible to disinfection and standard treatment and disinfection processes are expected to be effective. All public water systems in Texas must continue to monitor the levels of contaminants present in treated water and to verify that each contaminant does not exceed its maximum contaminant level, disinfectant level, or action level to ensure systems provide safe and adequate drinking water. Chemical and bacteriological sampling must continue to be conducted in accordance with your system's currently scheduled monitoring frequencies. The TCEQ will continue to utilize a third-party contractor to collect all chemical compliance samples for public water systems. If a public water system representative cannot be available at the time that chemical samples are scheduled to be collected at your public water system, please contact the Drinking Water Quality Team at PWSChem@tceq.texas.gov to discuss the issue. All public water systems must continue to provide public notification to consumers when sample results show that drinking water

exceeds a health-based standard and any adverse health effects that may occur.

The TCEQ is emphasizing the importance of maintaining adequate disinfectant treatment at your public water system in accordance with TCEQ's rules (minimum 0.2 mg/L free chlorine or 0.5 mg/L chloramine measured as total chlorine) to ensure continued health protection of drinking water. All public water systems must continue to maintain minimum disinfectant residual monitoring frequencies.

The TCEQ is committed to assisting you if your public water system is impacted by the COVID-19 pandemic. The TCEQ has created a centralized website to provide important information concerning COVID-19 at <https://www.tceq.texas.gov/response/covid-19>. A drinking water related webpage has also been created to provide specific steps that you can take to minimize impacts to your system and can be found at <https://www.tceq.texas.gov/response/covid-19/covid-19-public-water-system-disinfection>. The website contains up-to-date information concerning drinking water compliance, technical assistance, public water system guidance, agency contacts and other available resources related to drinking water.

Please ensure that all required records are maintained during this period. If you have any questions, please feel free to contact Mr. Richard Monreal, TCEQ Region 9 Water Section Manager, at (264) 761-3005..

Sincerely,

Susan Jablonski, P.E.
Area Director for Central Texas
Texas Commission on Environmental Quality
(512) 239-6731

From: Alexander H. Tucker <ATucker@killeentexas.gov>
Sent: Tuesday, March 24, 2020 8:34 AM
To: OCE <OCE@tceq.texas.gov>
Cc: Steve Kana <SKana@killeentexas.gov>; John Wiley <jwiley@killeentexas.gov>; Travis R. Ballard <tballard@killeentexas.gov>; James Seeger <JSeeger@killeentexas.gov>
Subject: City of Killeen Exemption Request

Please be advised, the City of Killeen Water & Sewer Department is requesting an exemption in regards to chemical analysis monitoring, nitrification sampling, and bacteriological sample testing for a period of sixty (60) days in preparation for a potential decrease in staffing due to the COVID-19 pandemic. This request is being sent after direction was given to our department through the TCEQ Central Texas Field Office on 03/23/2020.

Thank you,

| **Alexander Tucker**



Superintendent of SCADA/Facilities




Water & Sewer Dept.

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