

From: [Jonathan Walling](#)
To: [Carrie McCreery](#)
Cc: [OCE](#)
Subject: Request for sampling exemption- Macedonia MUD Extension
Date: Monday, June 1, 2020 2:08:15 PM

Good afternoon, Ms. McCreery:

Your request to extend the enforcement discretion for nitrification testing at Macedonia-Eylau Municipal Utility District is approved and will be valid until June 19, 2020. These activities must be conducted as soon as practicable, as conditions allow, before this date. Please note that the summer months are typically when nitrification is at higher risk. The sampling is important to detect the early stages of nitrification so that operational adjustments can be made, if needed. The sooner the testing can be conducted, the better. Should an extension beyond this be needed, please submit a new request for consideration.

This approval remains contingent on your system continuing with appropriate disinfection and residual monitoring.

Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: Carrie McCreery <[REDACTED]>
Sent: Friday, May 29, 2020 9:41 AM
To: Jonathan Walling <jonathan.walling@tceq.texas.gov>
Subject: Re: Request for sampling exemption- Macedonia MUD

Request for sampling exemption:

We are a small utility, with 2 Office Clerks, 3 Service Technicians, and 1 Manager. We previously asked for exemption for fire hydrant flushing because we were working with a skeleton crew. We no longer need the exemption for fire hydrant flushing.

However, as the Manager, I usually do the Nitrification Action Plan testing. 1 of our office clerks just returned from a 2 week quarantine on Tuesday May 26, and then found out on Wednesday that she would have to quarantine for another 2 weeks. I am having to do her job and have very limited time to do the testing. We would like to request an extension to the waiver of Nitrification testing for another month. We have seen no drop in chlorine residuals throughout our system during our daily chloramine testing.

Thank you,

[Carrie McCreery](#)

General Manager
Macedonia-Eylau Municipal Utility District
(903) 832-1691
(903) 824-2559

On Tue, Apr 21, 2020 at 3:24 PM Jonathan Walling <jonathan.walling@tceq.texas.gov> wrote:

Good afternoon, Ms. McCreery:

The TCEQ will continue to exercise enforcement discretion for the required nitrification sampling and fire hydrant flushing. This enforcement discretion will be in effect until May 25, 2020. These activities must be conducted as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please submit a request to extend this deadline. This approval remains contingent on your system continuing with appropriate disinfection and residual monitoring.

There are no changes to other components of the TCEQ's original enforcement discretion dated March 23, 2020.

Regulated entities must maintain records adequate to document activities related to any noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: Carrie McCreery <[REDACTED]>
Sent: Tuesday, April 21, 2020 11:11 AM
To: Jonathan Walling <jonathan.walling@tceq.texas.gov>
Subject: Re: Request for sampling exemption

Mr. Walling,

I would like to submit a second request to temporarily suspend nitrification action plan sampling and fire hydrant flushing. Bowie County is still under a Shelter In Place Order, and we are running with a skeleton crew. Due to the chlorine burn this winter we have seen no indication of nitrification, and all Chloramine samples have been high even at high age sampling sites.

Thank you,

[Carrie McCreery](#)

General Manager
Macedonia-Eylau Municipal Utility District

(903) 832-1691

(903) 824-2559

On Mon, Mar 23, 2020 at 3:54 PM Jonathan Walling <jonathan.walling@tceq.texas.gov> wrote:

Good afternoon, Ms. McCreery.

With the onset of COVID-19 (Coronavirus) and the Governor's Proclamation of a state of disaster in Texas, the TCEQ is aware that regulated entities may be experiencing an impact from a reduced workforce necessary to maintain normal operations at some facilities. All public water systems are encouraged to take all available actions necessary to ensure compliance with environmental regulations and drinking water authorization requirements to protect the health and safety of Texans and the environment.

Based on your current circumstances regarding bacteriological monitoring, the TCEQ's will accept the four samples marked as "special" (based on the microbial reporting form submitted with this request) used for the purpose of lifting the boil water notice to count toward your total of nine "routine" Revised Total Coliform Rule (RTCR) compliance monitoring samples required for the month of March. Normal bacteriological monitoring must resume in April as required by TCEQ's rules. Please collect the nine bacteriological samples for the month of April and mark those as "routine" to fulfill your system's monthly RTCR monitoring requirement. Ms. Jessica Hoch, team leader of the Drinking Water Assessment Team, can assist you in coordinating with the laboratory to ensure sample reporting is accomplished as needed for RTCR monitoring in March. Please contact her at jessica.hoch@tceq.texas.gov.

Concerning alternative sampling locations, you may sample from any site that is designated in your Sample Siting Plan, original, upstream, or downstream to obtain the nine bacteriological samples.

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. 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. Disinfectant residual monitoring is required to be monitored with your bacteriological samples. Your public water system must perform daily disinfectant residual monitoring to ensure adequate disinfectant throughout the entire distribution system. You indicated that there were monitoring locations that have closed or may close that are identified in your monitoring plans. If you cannot access these locations, you may collect disinfectant residual samples from any alternative site that would be considered representative of your system.

Providing that your system continues with disinfection and residual monitoring, the nitrification sampling and flushing may be delayed until April 24, 2020. Should a second extension become necessary, please re-submit your request.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: Carrie McCreery <[REDACTED]>
Sent: Friday, March 20, 2020 11:20 AM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Subject: Request for sampling exemption

Request for sampling exemption.

We are working with a skeleton crew. I have 2 small children, one of whom [REDACTED]
[REDACTED], and they are coming to work with me instead of going to daycare.

This past Sunday, the system we purchase water from experienced a loss of pressure and had to do a boil order. Since we purchase water from them, we did a boil order too, even though we never lost pressure in any parts of our system. That Monday, I took bacteriological samples to clear the boil order. I marked them as Routine samples, because I knew they would be negative, and I was hoping I could use the samples towards my required 9 samples per month. However, the lab told me that I could not use Routine samples to lift a boil order, so I changed it to Special. The results are attached. These samples were taken at the designated sample sites in my system. Could I use these samples as Routine samples to avoid having to re-sample?

A few other sampling exemptions that would be very helpful, I am sure not just to me, but to other utilities:

Permission to use SOP Upstream/Downstream sites for chlorine and bacteriological sampling. This would help, because all of our sites are public areas such as gas stations. It is hard to take samples in a gas station restroom while maintaining the suggested 6 foot distance from others.

Our system, and other systems that purchase water from Texarkana Water Utilities, just did a chlorine burn. Therefore there is no nitrification in our system at this time. In the past, it has taken at least a year after a chlorine burn to detect any nitrification in the system. It would be very helpful if we could suspend nitrification sampling temporarily.

Please, if TCEQ issues any waivers regarding bacteriological sampling, chlorine sampling, nitrification action plan sampling, or fire hydrant flushing, to let us know ASAP. Small systems like us are having a hard time getting meters read and bills out and keeping the systems going during this time.

Thank you,

[Carrie McCreery](#)

General Manager

Macedonia-Eylau Municipal Utility District

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