Control Number: 42954

Item Number: 7

Addendum StartPage: 0

House Bill (HB) 1600 and Senate Bill (SB) 567 83rd Legislature, Regular Session, transferred the functions relating to the economic regulation of water and sewer utilities from the TCEQ to the PUC effective September 1, 2014.

42954

RECEIVED

2014 SEP 25 PM 1:55

PUBLIC UTILITY COMMISSION
FILING CLERK

Mary Damron

From: Crystal Watkins
Sent: Tuesday, March 04, 2014 8:44 AM
To: Mary Damron
Subject: RE: City of Italy
Attachments: City of Italy Report.pdf

Hi Mary,

Attached is the investigation report for the 2013 CCI I conducted at the City of Italy. I'm available all this morning as well as the afternoon until 3 if you would like to discuss the violations.

Thanks,

Crystal Watkins
Texas Commission on Environmental Quality
Environmental Investigator, Region 4-DFW
Office: (817) 588-5800
Direct: (817) 588-5804
Fax : (817) 588-5701

If you would like to comment on my customer service, you can use the following link:

http://www.tceq.texas.gov/customersurvey., or you can contact my supervisor directly at: charles.l.marshall@tceq.texas.gov.

From: Mary Damron
Sent: Friday, February 28, 2014 11:39 AM
To: Crystal Watkins
Subject: City of Italy

Crystal,

The City of Italy is requesting to ament their CCN. Please call me when you can. I would like to discuss some of the water and wastewater violations. Will you please send me a copy of the latest investigation report?

Thank you,

Mary Damron
(512)239-4667
Texas Commission on Environmental Quality
MC-153, P.O. Box 13087
Austin, Texas 787114-3087

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 14, 2013

E SIGNATURE CONFIRMATION # 91 3408 2133 3931 6219 1443

The Honorable Frank Jackson
Mayor of Italy
PO Box 840
Italy, Texas 76651

COPY

Re: Notice of Violation for Public Water Supply Comprehensive Compliance Investigation at: City of Italy, 101 W. Main St., Italy, Ellis County, Texas
RN101402782, PWS ID No. 0700028, Investigation No. 1053031

Dear Mayor Jackson:

On January 14, 2013, Ms. Crystal Watkins of the Texas Commission on Environmental Quality (TCEQ) Dallas/Fort Worth (D/FW) Regional Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public water supply systems. Enclosed is a summary which lists the investigation findings. Certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **May 13, 2013** a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at http://www.tceq.state.tx.us for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the D/FW Regional Office at (817) 588-5800 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify the D/FW Regional Office within 10 days from the date of this letter. At that time, Mr. Charles Marshall, Public Water Supply Program Team Leader, will schedule a violation review meeting to be conducted

within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Watkins in the D/FW Regional Office at (817) 588-5804.

Sincerely,

Charles Marshall
Team Leader, Public Water Supply Program
D/FW Regional Office
Texas Commission on Environmental Quality

CM/cdw

Enclosure: Summary of Investigation Findings
Exit Interview Forms

Summary of Investigation Findings

CITY OF ITALY PWS 413 CLARK ST ITALY, ELLIS COUNTY, TX 76651 Additional ID(s): 0700028	Investigation # 1053031 Investigation Date: 01/14/2013

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 488853 **Compliance Due Date: 05/14/2013**
30 TAC Chapter 290.41(c)(3)(J)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/30/2013

Failure to provide a concrete sealing block surrounding Well #1 (G0700084A) that extends at least three feet from the well casing in all directions, has a minimum thickness of six inches, and is sloped to drain away, at no less than 0.25 inches per foot. The sealing block should not have any cracks, crevices, breaks, or openings of any kind.

30 TAC 290.41 (c)(3)(J) states that in all cases, a concrete sealing block extending at least three feet from the well casing in all directions, with a minimum thickness of six inches and sloped to drain away at not less than 0.25 inches per foot shall be provided around the wellhead.

On the day of the investigation, the concrete sealing block on both wells was severely cracked. A large gap was present between the well casing and concrete sealing block at Well #2. The water system submitted documentation stating that the sealing blocks will be fixed after release from the insurance company.

Recommended Corrective Action: Once approval from the insurance company for construction has been obtained, submit documentation to the regional office that the system has fixed the concrete sealing block and that there are no cracks, crevices, breaks or openings of any kind.

Track No: 488856 **Compliance Due Date: 05/14/2013**
30 TAC Chapter 290.42(e)(4)(C)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/30/2013

Failure to provide adequate ventilation for all enclosures in which gas chlorine is being stored or fed.

30 TAC 290.42(e)(4)(C) states that adequate ventilation, which includes both high level and floor level screened vents, shall be provided for all enclosures in which gas chlorine is being stored or fed. Enclosures containing more than one operating 150-pound cylinder of chlorine shall also provide forced air ventilation which includes: screened and lowered floor level and high level vents; a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent; and a fan switch located outside the enclosure. Alternately, systems may install negative pressure ventilation as long as the facilities also have gas containment and treatment as prescribed by the current International Fire Code (IFC).

On the day of the investigation, the water system did not have a fan installed inside the chlorine room or a fan switch located outside the enclosure. The water system submitted documentation stating that the chlorine room is under construction and is slated to be moved to a new location.

Recommended Corrective Action: Once construction has completed on the gas chlorine room, submit documentation to the regional office that the system has provided adequate ventilation through a fan that draws air in through the top vent and discharges to the outside atmosphere through the floor level vent.

Track No: 488972 **Compliance Due Date: 05/14/2013**
30 TAC Chapter 290.46(f)(3)(B)(v)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/31/2013

Failure to maintain a copy of the backflow prevention assembly tests.

30 TAC 290.46(f)(3)(B)(v) states that the records of backflow prevention device programs must be retained for at least three years.

On the day of the investigation, the water system did not have copies of the backflow prevention assembly tests available for review.

Recommended Corrective Action: Submit a letter and copies of the backflow prevention assembly tests to the regional office.

ALLEGED VIOLATION(S) NOTED AND RESOLVED ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 488976
30 TAC Chapter 290.41(c)(3)(K)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/31/2013

Failure to properly seal the wellhead.

30 TAC 290.41(c)(3)(K) states that wellheads and pump bases shall be sealed by a gasket or sealing compound to prevent the possibility of contaminating the well water. A well casing vent shall be provided with an opening that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated and located so as to minimize the drawing of contaminants into the well. Wellheads and well vents shall be at least two feet above the highest known watermark or 100-year flood elevation, if available, or adequately protected from possible flood damage by levees.

On the day of the investigation, there were cracks and gaps present in the well head's sealing compound.

Recommended Corrective Action: Submit documentation to the regional office that any holes and gaps present in the wellhead have been sealed by a gasket or sealing compound to prevent the possibility of contaminating the well water.

Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted a photograph verifying that the sealing compound had been removed and replaced with new sealant. This will resolve the alleged violation.

AREA OF CONCERN

Track No: 488973
30 TAC Chapter 290.42(l)

Alleged Violation:
Investigation: 1053031 Comment Date: 02/01/2013

Failure to maintain a complete, thorough, and up-to-date plant operations manual for operator

review and reference.

30 TAC 290.42(l) states that a thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency.

On the day of the investigation, the water system did not have a copy of the plant operations manual available for review..

Recommended Corrective Action: Submit to the regional office a letter and a copy of the water system plant operation manual. This manual should be of sufficient detail to provide the operator with routine maintenance/repair procedures done daily, weekly, monthly and annually, protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency. Maintain a copy of the system's plant operations manual in a central location that is easily available for review.

Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted a copy of the plant operations manual to the regional office. This will resolve the alleged violation.

Track No: 488975

30 TAC Chapter 290.121(a)

Alleged Violation:

Investigation: 1053031 Comment Date: 01/31/2013

Failure to develop and maintain a copy of the monitoring plan.

30 TAC 290.121(a) states that all public water systems shall maintain an up-to-date chemical and microbiological monitoring plan. Monitoring plans are subject to the review and approval of the executive director. A copy of the monitoring plan must be maintained at each water treatment plant and at a central location.

On the day of the investigation, the water system did not have a copy of the monitoring plan available for review.

Recommended Corrective Action: Submit a copy of the monitoring plan to the assigned enforcement coordinator which identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures/laboratories that the public water system will use to comply with the monitoring requirements of TAC 290.121. Maintain a copy of the system's monitoring plant in a central location that is easily available for review.

Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted a copy of the monitoring plan to the regional office. This will resolve the alleged violation.

Track No: 488978

30 TAC Chapter 290.46(m)

Alleged Violation:

Investigation: 1053031 Comment Date: 01/31/2013

Failure to utilize good maintenance and housekeeping practices to ensure the public water system are in good working condition and/or properly upkeep the general appearance of the system's facilities equipment.

30 TAC 290.46(m) states that good maintenance and housekeeping practices should be utilized to ensure the public water system are in good working condition and/or properly upkeep the general appearance of the system's facilities equipment. The maintenance and

condition and general appearance of the system's facilities and equipment. The grounds and facilities shall be maintained in a manner so as to minimize the possibility of the harboring of rodents, insects, and other disease vectors, and in such a way as to prevent other conditions that might cause the contamination of the water.

On the day of the investigation, there was a large dirt mound underneath the fencing around well site.

Recommended Corrective Action: Submit documentation to the regional office that the area around the facility has been cleared of all brush and leaf piles and that the facility is being kept in good working condition. Please ensure that all service pumps are kept in watertight condition.

Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted a photograph verifying that the grounds around the well sites were being maintained. The area is also being prepared for an upgrade in the water system facilities. This will resolve the alleged violation.

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name	City of Italy				TCEQ Add. ID No. RN No. (optional)	0700028	
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Routine		
Regulated Entity Contact	Dean Carrell			Telephone No.	972.483.7329	Date Contacted	1/14/13
Title	Public Works Director			Fax No.		Date Faxed	

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue — For Records Request: identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully descr

No.	Type[1]	Rule Citation (if known)	Description of Issue
1	AV	30 TAC 290	Failure to maintain a plant operations manual ✓
2	AV	30 TAC 290	Failure to maintain a monitoring plan ✓ ✓
3	AV	30 TAC 290	Failure to maintain the backflow prevention test results ✓
4	AV	30 TAC 290	Failure to maintain calibration records for the Hach colorimete
5	AV	30 TAC 290	Failure to properly seal the wellhead on well #3.
6	AV	30 TAC 290	Failure to properly maintain the concrete sealing block on well #2 &
7	AV	30 TAC 290	Failure to maintain functioning upper fan in gas chlorine roor

[1]ue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	☐ Yes	☒ No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	☐ Yes	☒ No

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JAN 30 2013
DFW REGION-4

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and assoc continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Crystal D. Watkins	1-14-13	Dean W Carrell	1-14-1
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.
Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512-239-3282.

White Copy: Regulated Entity Representative Yellow Copy: TCEQ
TCEQ-20085 (Rev. 6/07)

(Note: Use additional pages as necessary) Page 1 o

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name	City of Italy				TCEQ Add. ID No. RN No. (optional)	0700028	
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Routine		
Regulated Entity Contact	Dean Carrell			Telephone No.		Date Contacted	1/14/13
Title	Public Works Director			Fax No.		Date Faxed	

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCE findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue — For Records Request: identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully describe

No.	Type[1]	Rule Citation (if known)	Description of Issue
8	AV	30 TAC 290	Failure to have a working well meter on Wells #1 & 2
9	AV	30 TAC 290	Failure to properly maintain the grounds.
10	RR		Please provide a copy of the NSF Certification for gas chlori
11	RR		Please provide a copy of the most recent well meter calibratic records.
12	AI		Please update the drought contingency plan.

[1] Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	☐ Yes	☒ No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	☐ Yes	☒ No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associat continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date
Crystal Watkins	1-14-13	Dean Carrell / Dean Carrell	1-14-1

If you have questions about any information on this form, please contact your local TCEQ Regional Office.
Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512-239-3282.

White Copy: Regulated Entity Representative Yellow Copy: TCEQ

TCEQ-20085 (Rev. 6/07)

(Note: Use additional pages as necessary) Page 2 of

PWS/0700028/CO

Texas Commission on Environmental Quality
Investigation Report
City of Italy
CN600460026

CITY OF ITALY PWS

RN101402782

Investigation # 1053031

Incident #

Investigator: CRYSTAL WATKINS

Site Classification
GW 251-1K CONNECTION

Conducted: 01/14/2013 -- 01/14/2013

SIC Code: 4941

Program(s): PUBLIC WATER SYSTEM/SUPPLY

Investigation Type : Compliance Investigation

Location : INTERSECTION OF HWY 34 AND HWY 77

Additional ID(s) : 0700028

Address: 413 CLARK ST; ITALY, TX 76651

Activity Type : REGION 04 - DFW METROPLEX PWSCCIGWCM - PWSCCOGWCM PWS CCI Discretionary Groundwater, Purchase, Community

COPY

Principal(s) :

Role	Name
RESPONDENT	CITY OF ITALY

Contact(s) :

Role	Title	Name	Phone	
Notified	CONTRACT OPERATOR	MR DEAN CARRELL	Fax Work	(972) 483-2800 (972) 483-7329
Participated in Investigation	CONTRACT OPERATOR	MR DEAN CARRELL		
Regulated Entity Contact	MAYOR	HON FRANK JACKSON	Work	(972) 483-7329
Regulated Entity Mail Contact	MAYOR	HON FRANK JACKSON	Work	(972) 483-7329
Participated in Investigation	EMPLOYEE	MR SHEDRIC WALKER	Work	(972) 843-7329
Participated in Investigation	EMPLOYEE	MR CLINTON MCCASLAND	Work	(972) 483-7329

Other Staff Member(s) :

Role	Name
Investigator	ARIEL YEH
Supervisor	CHARLES MARSHALL
QA Reviewer	CHARLES MARSHALL

Associated Check List

Checklist Name	Unit Name
PWS EMERGENCY POWER INITIATIVE	CITY OF ITALY
PWS INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING	CITY OF ITALY

PWS STANDARD FIELD CITY OF ITALY

Investigation Comments :

INTRODUCTION

Dean Carrell, Public Works Director for the City of Italy, received prior notification of the Comprehensive Compliance Investigation (CCI) from Ms. Crystal Watkins, Texas Commission on Environmental Quality (TCEQ) Dallas/Fort Worth (D/FW) Regional Investigator, on January 7, 2013. A list of records required for the investigation was emailed to Mr. Carrell on January 7, 2012. On January 14, 2013, Ms. Watkins and Ms. Ariel Yeh, TCEQ D/FW Regional Investigator, conducted the investigation and exit interview was conducted with Mr. Carrell, Clinton McCasland, and Shedric Walker, employees for the City of Italy.

Several alleged violations were noted during the investigation and a Notice of Violation was sent to the system.

GENERAL FACILITY AND PROCESS INFORMATION

The City of Italy is a community water system located in Ellis County, Texas. The water system serves 731 connections with an approximate population of 2193 based on three person per connection. The water system consists of three groundwater wells that supply one water plant and one pressure plane.

Water from the groundwater wells enter two cooling tower and then are disinfected with gas chlorine before entering a ground storage tank. Water is then transferred via three transfer pumps to another ground storage tank. Two service pumps pump water from storage to the distribution system and an elevated storage tank provide storage and pressure maintenance for the system.

****Specific facility information and capacity calculations such as tank volumes pump capacities, etc. can be found in the Public Water System Database Sheet attached to this CCI report. *****

EXCEPTION/ALTERNATIVE CAPACITY REQUIREMENT
N/A

BACKGROUND

The last compliance investigation at the City of Italy PWS was conducted March 18, 2010. Several alleged violations had been cited and have since been resolved.

ADDITIONAL INFORMATION

Records Review

During the investigation, the following records were requested for review: well completion data, plant operations manual, monitoring plan, drought contingency plan, distribution map, customer service agreements, NSF certifications, equipment calibration records, public notices, monthly operating reports, disinfectant level quarterly operating reports, flushing records, disinfectant residual monitoring records, customer complaint records and bacteriological sampling records for the previous twelve months.

All records were readily available for review.

Capacity

During the investigation, the water system capacities were evaluated. During the investigation, the well meters on Wells #1 and #2 were out of service; therefore estimates from the well calibration

tests were used. The system is required to provide 438.6 gallons per minute (GPM) of water and produce 607 GPM. See the investigation attachments for a copy of the Water System Diagram, Water System Data Sheet, and PWS Database Printout for further information.

Sampling

The disinfectant residual and distribution pressure were measured at 409 Venice with a residual of 0.3 milligrams per liter (mg/L) free chlorine and a pressure of 73 pounds per square inch (psi).

NOV Date	Method
02/14/2013	WRITTEN

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 488853 **Compliance Due Date: 05/14/2013**
Violation Start Date: 1/14/2013

30 TAC Chapter 290.41(c)(3)(J)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/30/2013

Failure to provide a concrete sealing block surrounding Well #1 (G0700084A) that extends at least three feet from the well casing in all directions, has a minimum thickness of six inches, and is sloped to drain away, at no less than 0.25 inches per foot. The sealing block should not have any cracks, crevices, breaks, or openings of any kind.

30 TAC 290.41 (c)(3)(J) states that in all cases, a concrete sealing block extending at least three feet from the well casing in all directions, with a minimum thickness of six inches and sloped to drain away at not less than 0.25 inches per foot shall be provided around the wellhead.

On the day of the investigation, the concrete sealing block on both wells was severely cracked. A large gap was present between the well casing and concrete sealing block at Well #2. The water system submitted documentation stating that the sealing blocks will be fixed after release from the insurance company.

Recommended Corrective Action: Once approval from the insurance company for construction has been obtained, submit documentation to the regional office that the system has fixed the concrete sealing block and that there are no cracks, crevices, breaks or openings of any kind.

Track No: 488856 **Compliance Due Date: 05/14/2013**
Violation Start Date: 1/14/2013

30 TAC Chapter 290.42(e)(4)(C)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/30/2013

Failure to provide adequate ventilation for all enclosures in which gas chlorine is being stored or fed.

30 TAC 290.42(e)(4)(C) states that adequate ventilation, which includes both high level and floor level screened vents, shall be provided for all enclosures in which gas chlorine is being stored or fed. Enclosures containing more than one operating 150-pound cylinder of chlorine shall also provide forced air ventilation which includes: screened and lowered floor level and high level vents; a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent; and a fan switch located outside the enclosure. Alternately, systems may install negative pressure

ventilation as long as the facilities also have gas containment and treatment as prescribed by the current International Fire Code (IFC).

On the day of the investigation, the water system did not have a fan installed inside the chlorine room or a fan switch located outside the enclosure. The water system submitted documentation stating that the chlorine room is under construction and is slated to be moved to a new location.

Recommended Corrective Action: Once construction has completed on the gas chlorine room, submit documentation to the regional office that the system has provided adequate ventilation through a fan that draws air in through the top vent and discharges to the outside atmosphere through the floor level vent.

Track No: 488972 **Compliance Due Date: 05/14/2013**
Violation Start Date: 1/14/2013

30 TAC Chapter 290.46(f)(3)(B)(v)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/31/2013

Failure to maintain a copy of the backflow prevention assembly tests.

30 TAC 290.46(f)(3)(B)(v) states that the records of backflow prevention device programs must be retained for at least three years.

On the day of the investigation, the water system did not have copies of the backflow prevention assembly tests available for review.

Recommended Corrective Action: Submit a letter and copies of the backflow prevention assembly tests to the regional office.

ALLEGED VIOLATION(S) NOTED AND RESOLVED ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 488976 **Resolution Status Date: 1/31/2013**
Violation Start Date: 1/14/2013 **Violation End Date:1/30/2013**

30 TAC Chapter 290.41(c)(3)(K)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/31/2013

Failure to properly seal the wellhead.

30 TAC 290.41(c)(3)(K) states that wellheads and pump bases shall be sealed by a gasket or sealing compound to prevent the possibility of contaminating the well water. A well casing vent shall be provided with an opening that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated and located so as to minimize the drawing of contaminants into the well. Wellheads and well vents shall be at least two feet above the highest known watermark or 100-year flood elevation, if available, or adequately protected from possible flood damage by levees.

On the day of the investigation, there were cracks and gaps present in the well head's sealing compound.

Recommended Corrective Action: Submit documentation to the regional office that any holes and gaps present in the wellhead have been sealed by a gasket or sealing compound to prevent the possibility of contaminating the well water.

Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted

a photograph verifying that the sealing compound had been removed and replaced with new sealant. This will resolve the alleged violation.

AREA OF CONCERN

Track No: 488973 **Resolution Status Date: 2/1/2013**
Violation Start Date: 1/14/2013 **Violation End Date:1/30/2013**

30 TAC Chapter 290.42(l)

Alleged Violation:
Investigation: 1053031 Comment Date: 02/01/2013

Failure to maintain a complete, thorough, and up-to-date plant operations manual for operator review and reference.

30 TAC 290.42(l) states that a thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency.

On the day of the investigation, the water system did not have a copy of the plant operations manual available for review.

Recommended Corrective Action: Submit to the regional office a letter and a copy of the water system plant operation manual. This manual should be of sufficient detail to provide the operator with routine maintenance/repair procedures done daily, weekly, monthly and annually, protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency. Maintain a copy of the system's plant operations manual in a central location that is easily available for review.

Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted a copy of the plant operations manual to the regional office. This will resolve the alleged violation.

Track No: 488975 **Resolution Status Date: 1/31/2013**
Violation Start Date: 1/14/2013 **Violation End Date:1/30/2013**

30 TAC Chapter 290.121(a)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/31/2013

Failure to develop and maintain a copy of the monitoring plan.

30 TAC 290.121(a) states that all public water systems shall maintain an up-to-date chemical and microbiological monitoring plan. Monitoring plans are subject to the review and approval of the executive director. A copy of the monitoring plan must be maintained at each water treatment plant and at a central location.

On the day of the investigation, the water system did not have a copy of the monitoring plan available for review.

Recommended Corrective Action: Submit a copy of the monitoring plan to the assigned enforcement coordinator which identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures/laboratories that the public water system will use to comply with the monitoring requirements of TAC 290.121. Maintain a copy of the system's monitoring plant in

a central location that is easily available for review.
Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted a copy of the monitoring plan to the regional office. This will resolve the alleged violation.

Track No: 488978 **Resolution Status Date: 1/31/2013**
Violation Start Date: 1/14/2013 **Violation End Date:1/30/2013**

30 TAC Chapter 290.46(m)

Alleged Violation:
Investigation: 1053031 Comment Date: 01/31/2013

Failure to utilize good maintenance and housekeeping practices to ensure the public water system are in good working condition and/or properly upkeep the general appearance of the system's facilities equipment.

30 TAC 290.46(m) states that good maintenance and housekeeping practices should be utilized to ensure the public water system are in good working condition and/or properly upkeep the general appearance of the system's facilities equipment. The maintenance and housekeeping practices used by a public water system shall ensure the good working condition and general appearance of the system's facilities and equipment. The grounds and facilities shall be maintained in a manner so as to minimize the possibility of the harboring of rodents, insects, and other disease vectors, and in such a way as to prevent other conditions that might cause the contamination of the water.

On the day of the investigation, there was a large dirt mound underneath the fencing around well site.

Recommended Corrective Action: Submit documentation to the regional office that the area around the facility has been cleared of all brush and leaf piles and that the facility is being kept in good working condition. Please ensure that all service pumps are kept in watertight condition.
Resolution: On January 30, 2013, Mr. Dean Carrell, Public Works Director for City of Italy, submitted a photograph verifying that the grounds around the well sites were being maintained. The area is also being prepared for an upgrade in the water system facilities. This will resolve the alleged violation.

Signed Crystal D. Watkins **Date** 2/1/13
Environmental Investigator

Signed _____ **Date** 2/8/13
Supervisor

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
X Letter to Facility (specify type) : NOV
Investigation Report
___Sample Analysis Results
___Manifests
___NOR

X Maps, Plans, Sketches
X Photographs
X Correspondence from the facility
___Other (specify) :
- Updated IWUD
- Operator's Certification
- Water System Data Sheet

PUBLIC WATER SYSTEM DATA

Name of System:	City of Italy		
CCN Number:	10885	**PWS ID:**	700028
Classification:	Not Applicable	**Type:**	Community
Region Number:	4		

Interconnect with Other PWS:	No	**Name of PWS I/C:**	
Type I/C:			

Retail Service Connections:		**Retail Meters:**	731
Retail Population:	2193		

Wholesale Master Meters:		**Wholesale Service Connections:**	
Wholesale Population:			

Total Well Capacity:	607 GPM 0.874 MGD
Raw Capacity:	GPM MGD

Total Elevated Storage:	0.300 MG	**Total Storage Capacity:**	1.25 MG
Pressure Tank Capacity:	0.0		

Maximum Daily Usage:	0.362 MGD	**Date:**	07/04/2012
Average Daily Usage:	0.168 MGD	**Time Period:**	01/01/2012to 12/31/2012
Wholesale Contract:	No	**Maximum Purchase Rate :**	
No. of Samples Required:	2	**No. of Samples Submitted:**	2
No. of Raw Samples Required:	0	**No. of Raw Samples Submitted:**	
Non-Comm Dates of Operation:	09/09/9999 to 09/09/9999		

WATER STORAGE TANKS

Type	Capacity	Material	Location
EL	0.3 MG	ST	104 Harpold
GR	0.2 MG	ST	Simms Street(PS#2)
GR	0.075 MG	CC	413 Clark Street (PS#1)

WATER SOURCES

EP No	Source Code	Owner's Des	Location	Status	Pump Type	Tst. GPM	Est. GPM	Tst/Est GPM Date
1	G0700028B	Well#2	600 Clark	O	Submersible	303		04/26/2007
1	G0700028C	Well#3	600 Clark	O	Submersible	160		04/26/2007
1	G0700028A	Well#1	101 Houston St.	O	Submersible	144		04/26/2007

SERVICE PUMPS

Pump Number	Output	Location
1	75 HP(1500 GPM)	Simms Street(PS#2)
2	75 HP(1500 GPM)	Simms Street(PS#2)

SYSTEM CAPACITIES

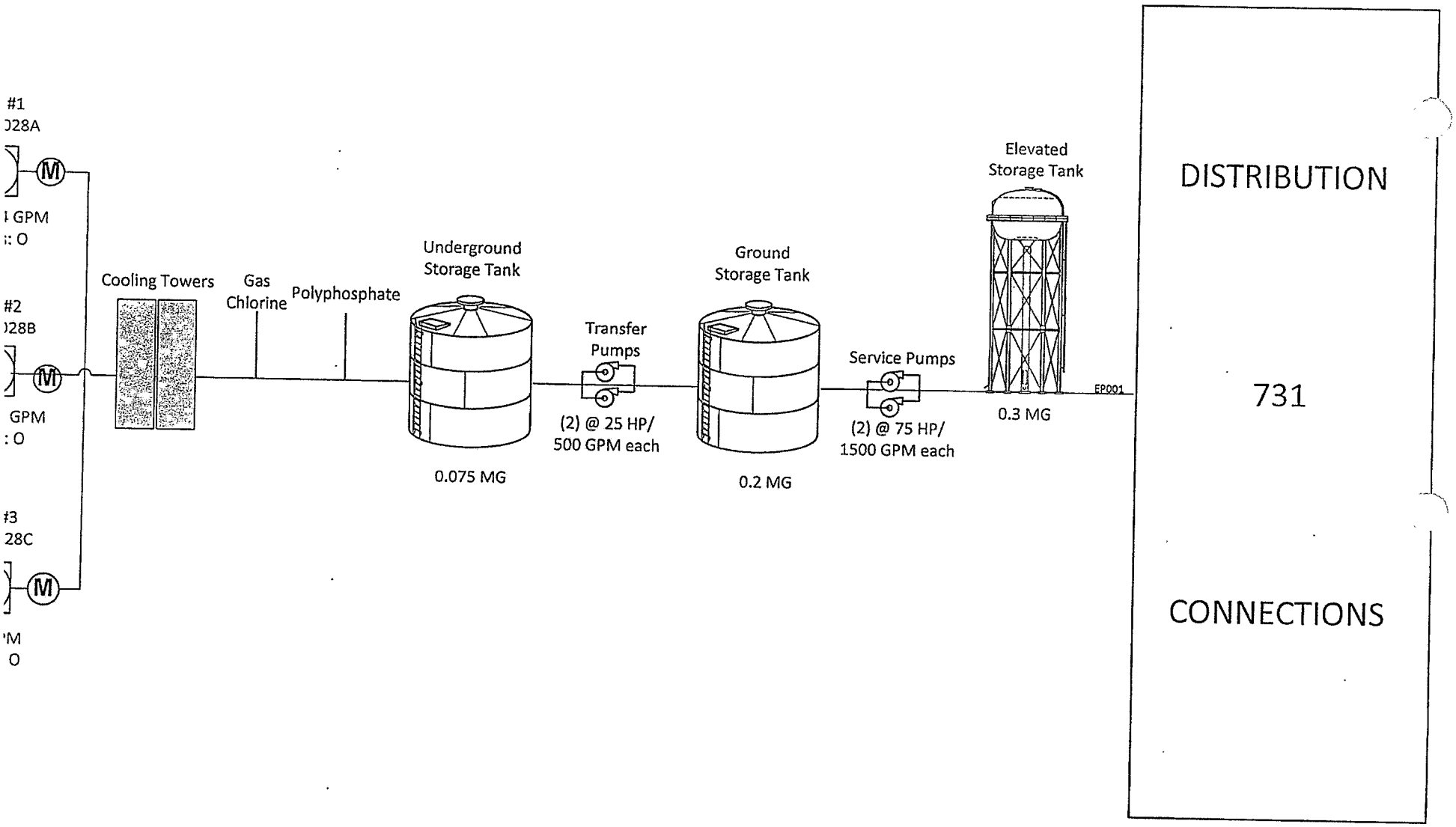
Pressure Plane Number: 1 **Name:** Pressure Plane #1

System Capacities					Required		Provided
Well Production	0.6	GPM Conn	X	731	Conn = 438.6	GPM	607
Elevated Pressure Storage	200	Gal/Conn	X	731	Conn = 0.1462	MG	0.300
Ground/Total Storage	200	Gal/Conn	X	731	Conn = 0.1462	MG	1.25
Service Pump Capacity	0.6**	GPM/Conn	X	731	Conn = 438.6	GPM	3000
Service Pump Peaking Factor		MDD/1440	X		**	GPM	

Tested PSI: 73 Tested CL2: 0.3 Free Location: 409 Venice

' of Italy
S ID# 0700028
estigation Date: 01/14/2013
estigator: Crystal Watkins

Texas Commission on Environmental Quality
Public Water System Diagram
TCEQ Region 4



Mary Damron

From: Crystal Watkins
Sent: Monday, March 31, 2014 9:44 AM
To: Mary Damron
Subject: City of Italy Exit Interview Response
Attachments: City of Italy Exit Interview Response.pdf

Hi Mary,

Please see the attached exit interview response from the City of Italy. The city has three outstanding violations. After further review, I would say that the most serious is the well sealing block, followed by the backflow test reports and finally the ventilation in the gas chlorine room.

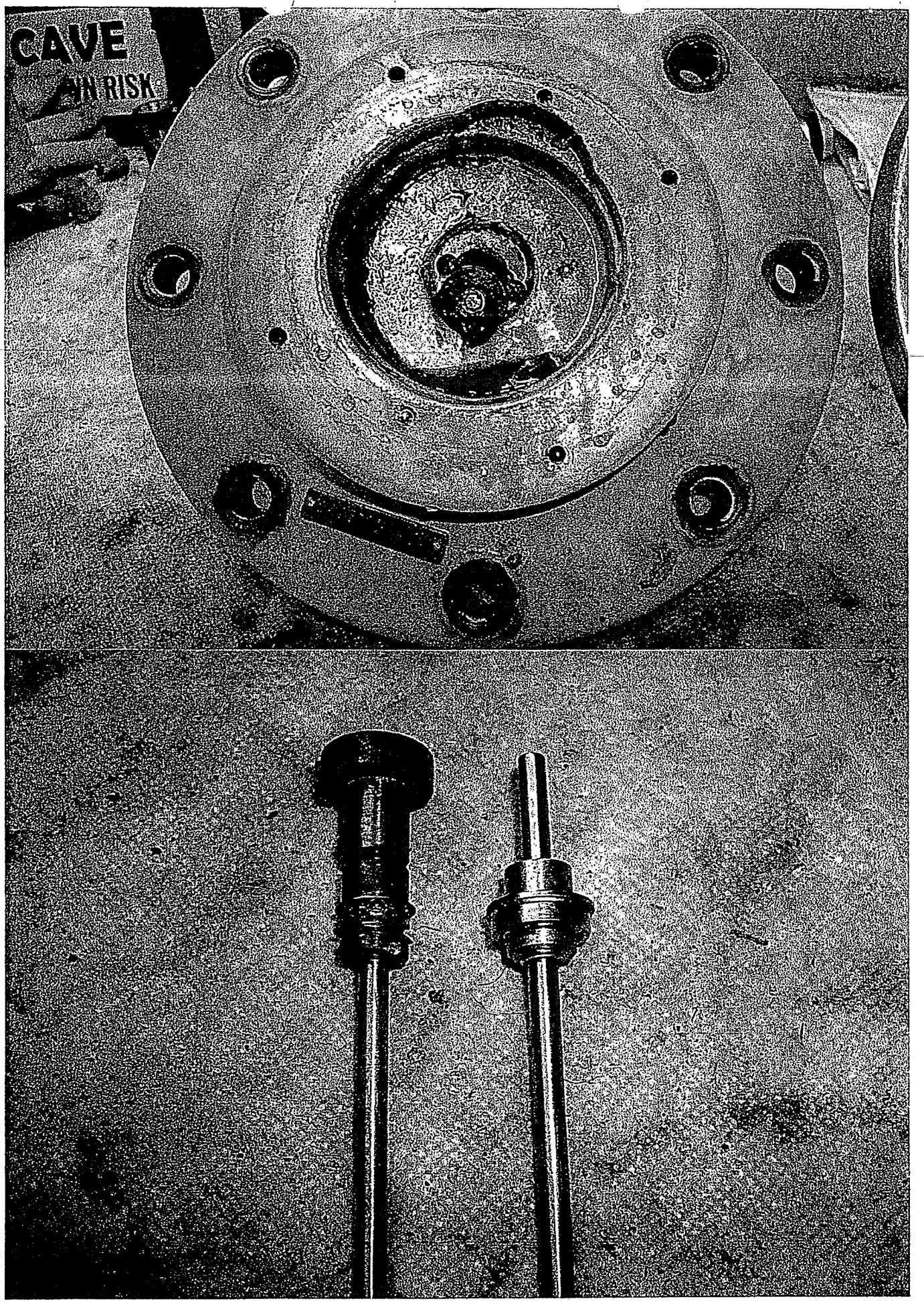
Let me know if you have any additional questions.

Thanks,

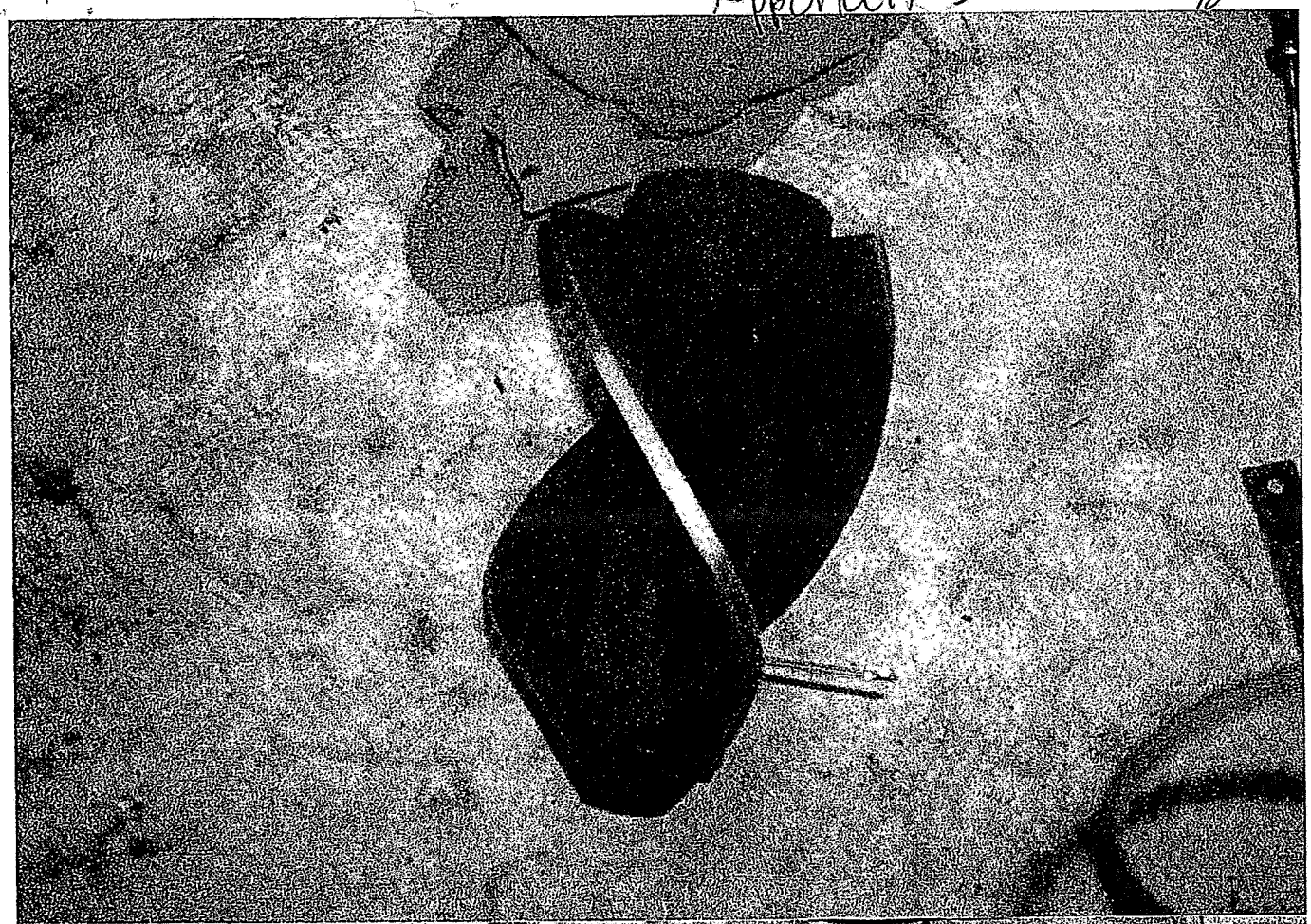
Crystal Watkins
Texas Commission on Environmental Quality
Environmental Investigator, Region 4-DFW
Office: (817) 588-5800
Direct: (817) 588-5804
Fax : (817) 588-5701

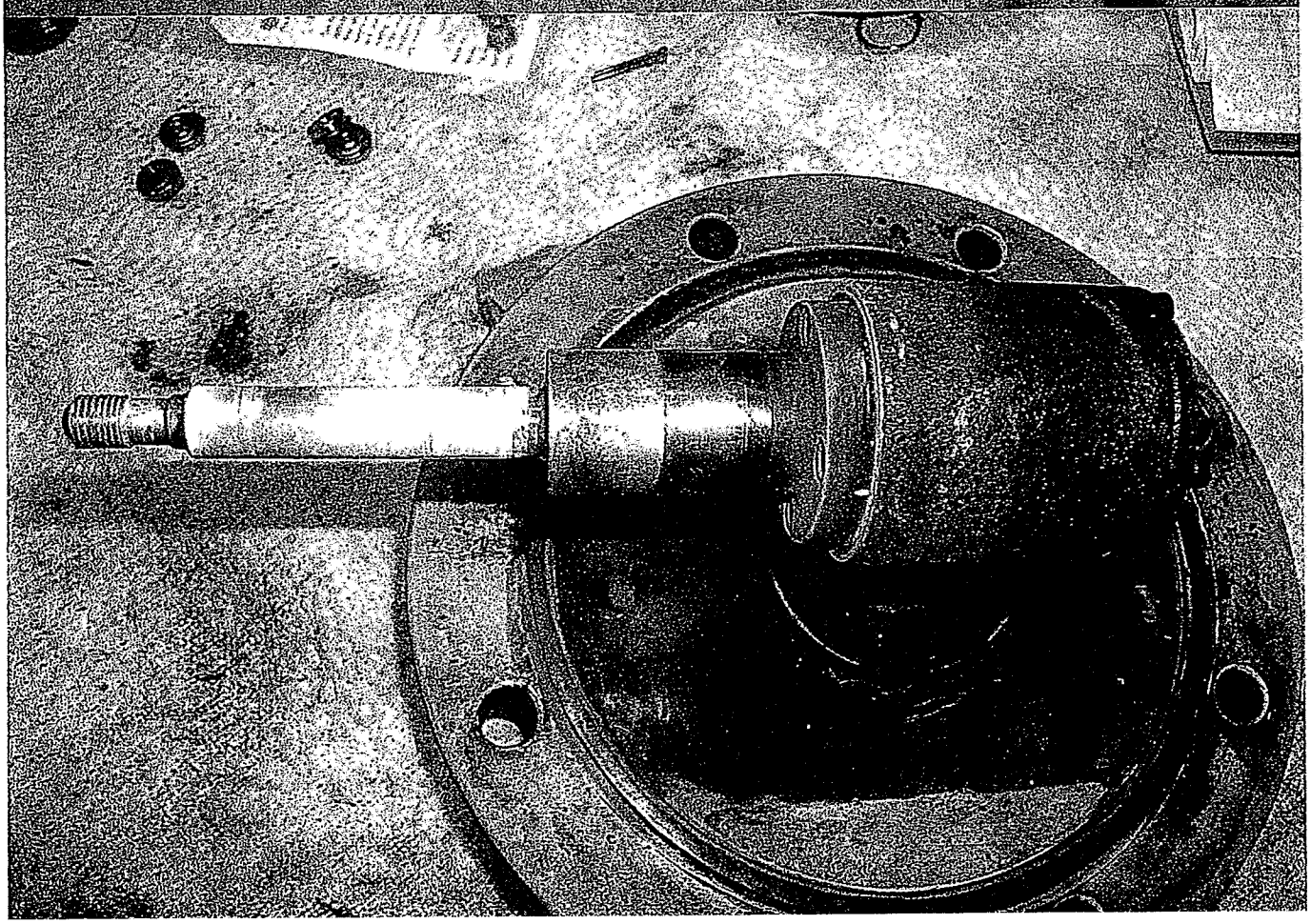
CAT
DEMOLITION

Appendix 84

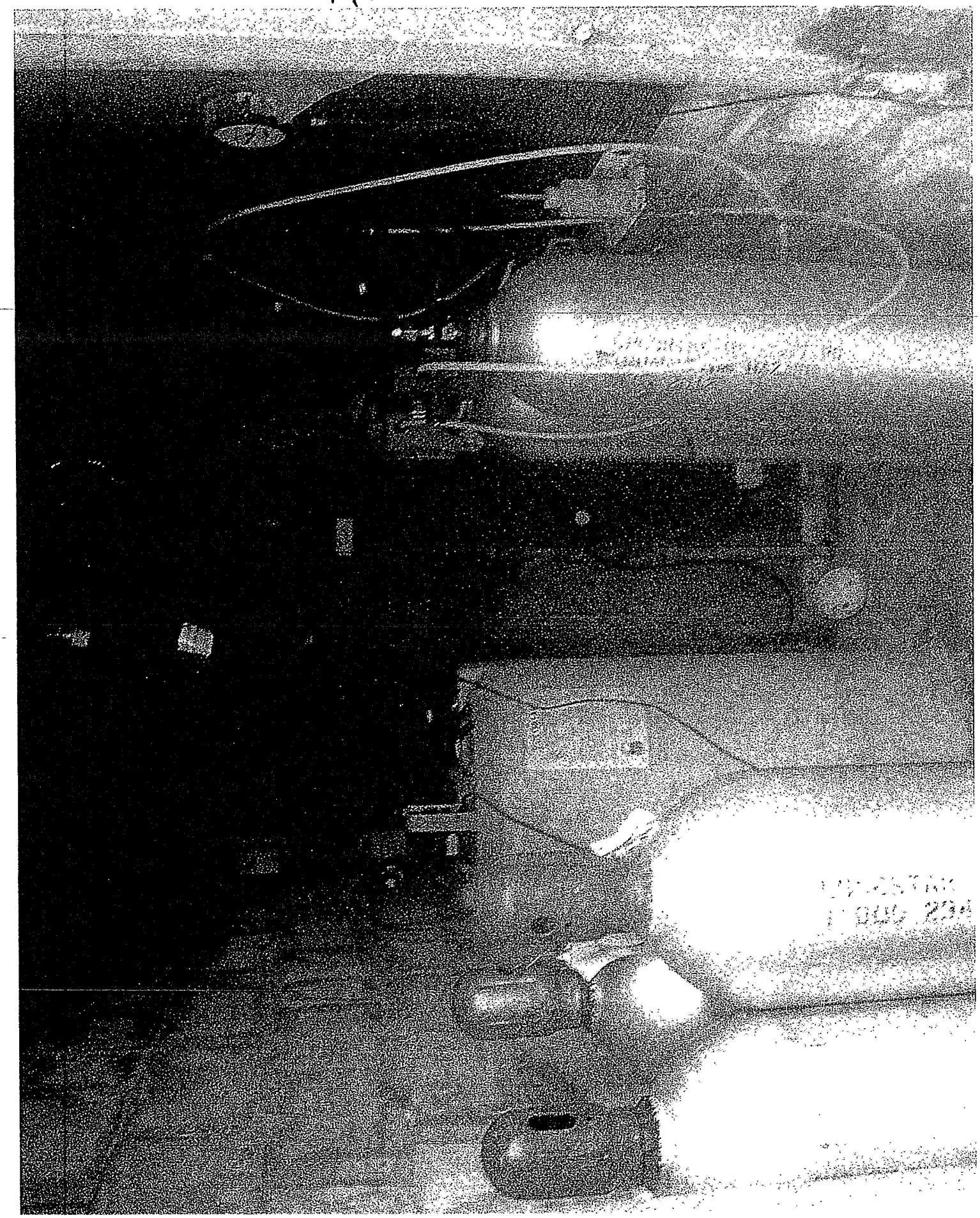

CAVE
AN RISK

Appendix 3

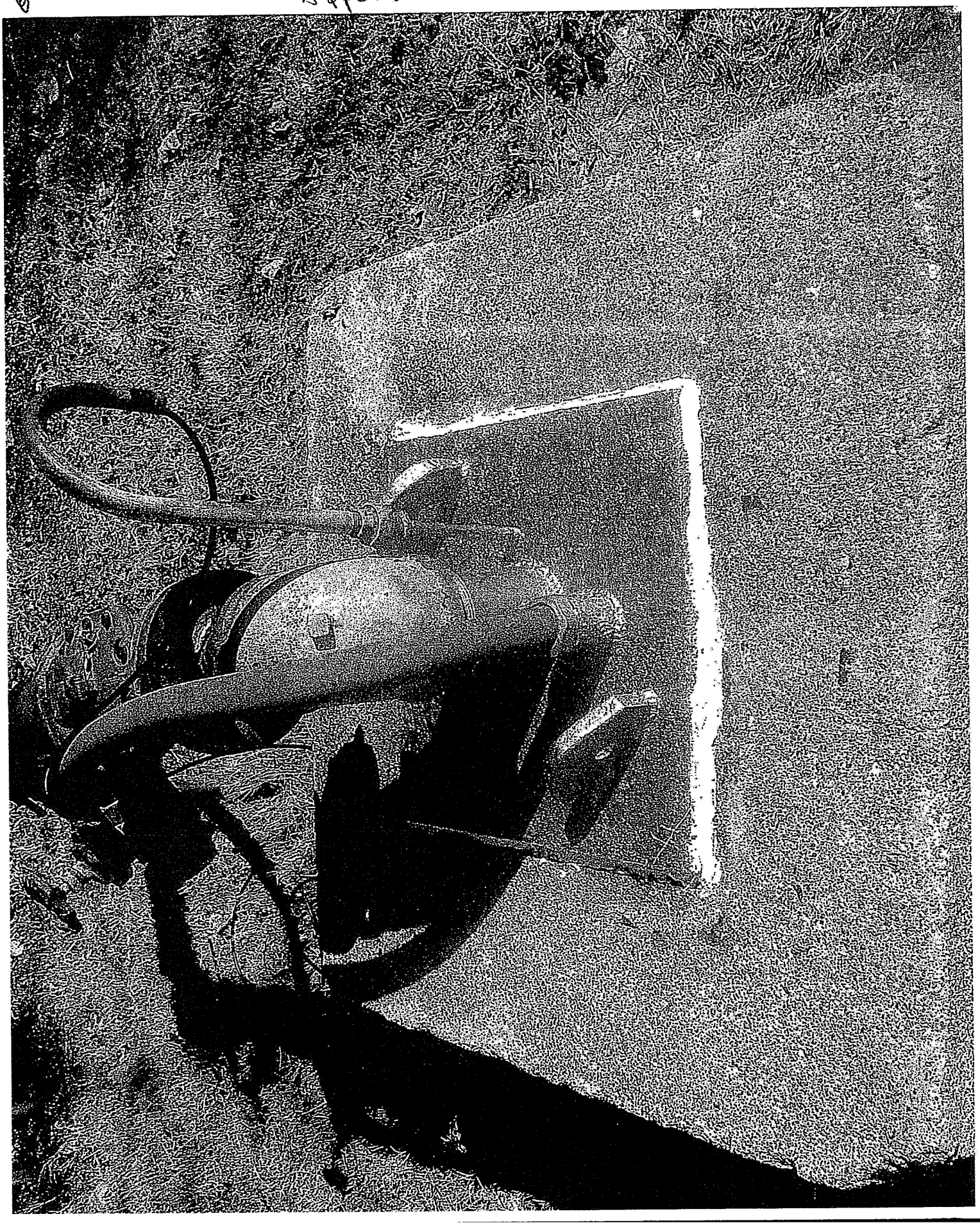




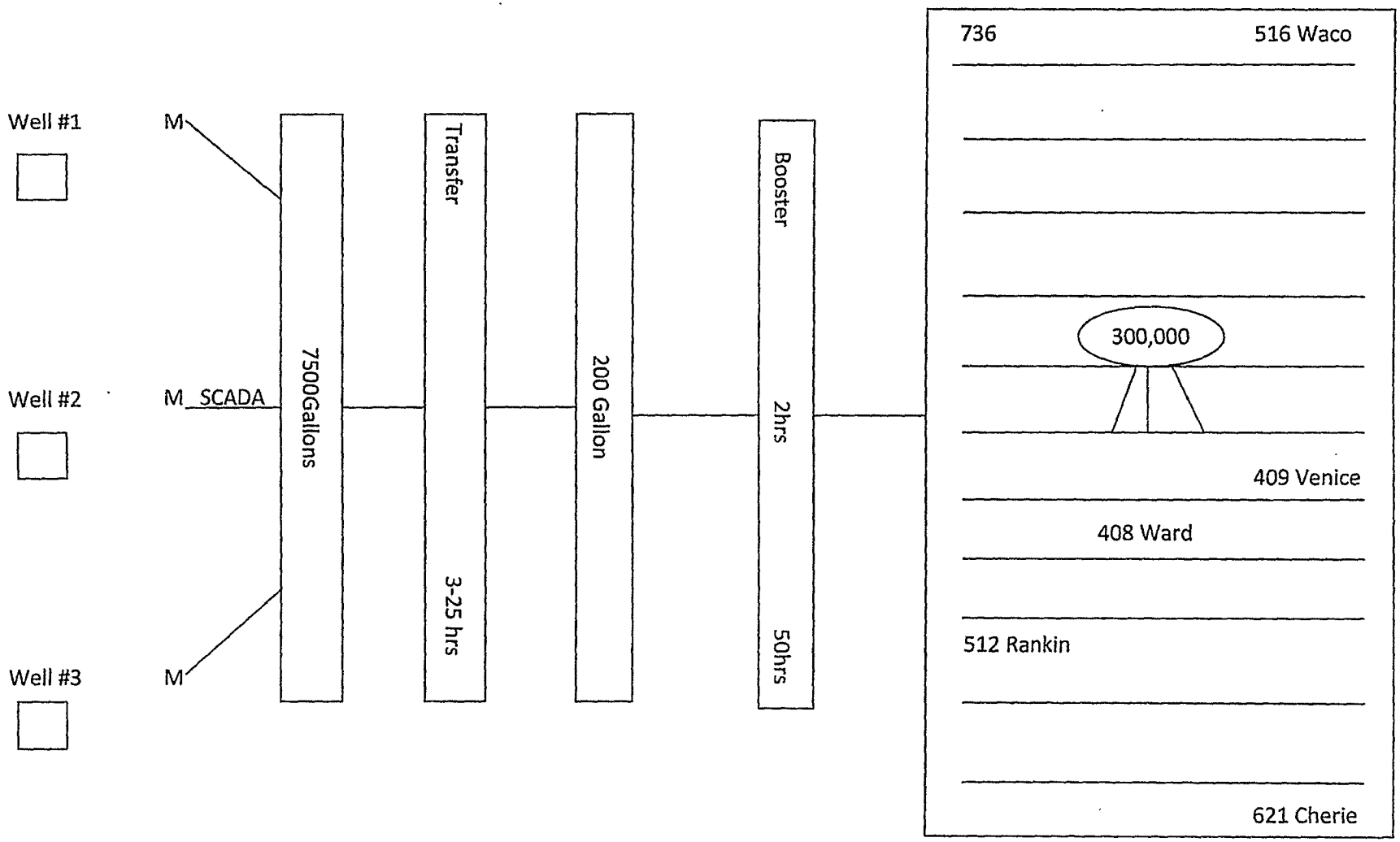
Appendix 2



Appendix 1



Appendix 1. Distribution Sampling System



K W UTILITIES

"THE WATER METER PEOPLE"

4793 FM 639
FROST, TEXAS 76641

PHONE - 254 678 1129
FAX - 254 678 9071

EMAIL - KWMETERS@MYWAY.COM

"WE APPRECIATE YOUR BUSINESS" *"HUB" MEMBER OWNED BUSINESS*

METER TESTING - REPAIR - SALES

DATE: March 4, 2011

TO: City of Italy

METER LOCATION: City Hall Well #1

METER BRAND: Hersey *SIZE: 4"*

TYPE: Turbine *SERIAL: 7053832*

START READING: 11963500 *END READING: 11965600*

CERTIFICATION OF CALIBRATION

This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards (NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.

LOW FLOW: *QUANTITY:* *ACCURACY:*

MEDIUM FLOW: *QUANTITY:* *ACCURACY:*

HIGH FLOW: 144gpm *QUANTITY: 1000gal* *ACCURACY: 99.6%*

COMMENTS: This Meter is within AWWA Standards.

TESTED BY:

Ken Whitsitt

II

K W UTILITIES

"THE WATER METER PEOPLE"

4793 FM 639
FROST, TEXAS 76641

PHONE - 254 678 1129
FAX - 254 678 9071

EMAIL: KWMETERS@MYWAY.COM

"WE APPRECIATE YOUR BUSINESS" **"HUB" MEMBER OWNED BUSINESS**

METER TESTING - REPAIR - SALES

DATE: April 26, 2012

TO: City of Italy

METER LOCATION: Hwy 77 Storage

METER BRAND: Water Specialties SIZE: 6"

TYPE: Propeller Ml-03 SERIAL NUMBER: 20053938

START READING: 442741000 END READING: 442742000

CERTIFICATION OF CALIBRATION

This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards (NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.

LOW FLOW:	QUANTITY:	ACCURACY:
MEDIUM FLOW:	QUANTITY:	ACCURACY:
HIGH FLOW: 176gpm	QUANTITY: 1000gal	ACCURACY: 98.6%

COMMENTS: This Meter is within AWWA Standards.

TESTED BY:

Ken Whitsitt

K W UTILITIES

"THE WATER METER PEOPLE"

4793 FM 639
FROST, TEXAS 76641

PHONE - 254 678 1129 -
FAX - 254 678 9071

EMAIL: KWMETERS@MYWAY.COM

"WE APPRECIATE YOUR BUSINESS" ***"HUB" MEMBER OWNED BUSINESS***

METER TESTING - REPAIR - SALES

DATE: April 26, 2012

TO: City of Italy

METER LOCATION: Clark St.. Woodbine #3

METER BRAND: Sensus *SIZE: 3"*

TYPE: Turbine *SERIAL NUMBER: 66904529*

START READING: 18467600 *END READING: 18466500*

CERTIFICATION OF CALIBRATION

This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards (NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.

LOW FLOW: *QUANTITY:* *ACCURACY:*

MEDIUM FLOW: *QUANTITY:* *ACCURACY:*

HIGH FLOW: 157gpm *QUANTITY: 1000gal* *ACCURACY: 98.7%*

COMMENTS: This Meter is within AWWA Standards.

TESTED BY:

Ken Whitsitt

8/2 repair

K W UTILITIES

"THE WATER METER PEOPLE"

4793 FM 639
FROST, TEXAS 76641

PHONE - 254 678 1129-
FAX - 254 678 9071

EMAIL: KWMETERS@MYWAY.COM

"WE APPRECIATE YOUR BUSINESS" **"HUB" MEMBER OWNED BUSINESS**

METER TESTING - REPAIR - SALES

DATE: April 26, 2012

TO: City of Italy

METER LOCATION: Clark st. Trinity #2

METER BRAND: Water Specialties *SIZE: 4"*

TYPE: Propeller MI-03 *SERIAL NUMBER: 20061737*

START READING: 9598200 *END READING: 9599400*

CERTIFICATION OF CALIBRATION

This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards (NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.

LOW FLOW: *QUANTITY:* *ACCURACY:*

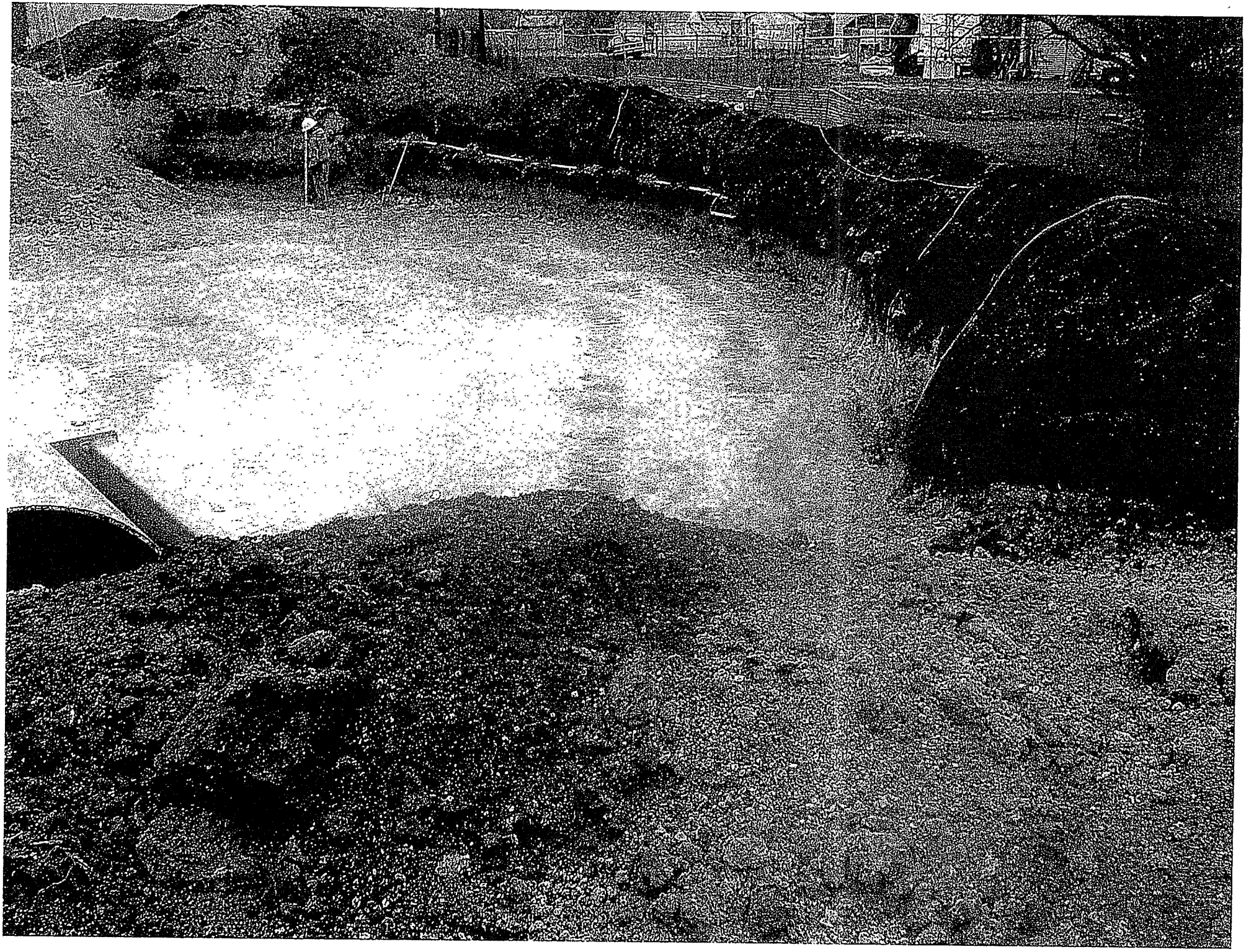
MEDIUM FLOW: *QUANTITY:* *ACCURACY:*

HIGH FLOW: 303gpm *QUANTITY: 1000gal* *ACCURACY: 100.8%*

COMMENTS: This Meter is within AWWA Standards.

TESTED BY:

Ken Whitsitt



CITY OF ITALY

COPY

TCEQ Exit Interview Response

City of Italy
101 W. Main
Italy, Texas 76651

Violations List

The City of Italy is responding to the investigation by TCEQ that took place on January 14, 2013. Chrystal D. Watkins was the investigator and performed the exit interview. The number, type and rule citation are listed below.

1. AV 30 TAC 290 Failure to maintain a plant operations manual.
2. AV 30 TAC 290 Failure to maintain a monitoring plan.
3. AV 30 TAC 290 Failure to maintain backflow prevention test results.
4. AI 30 TAC 290 Failure to maintain calibrations records for the Hach colorimeter.
5. AV 30 TAC 290 Failure to properly seal the well head on well #3.
6. AV 30 TAC 290 Failure to maintain the concrete sealing block on well #2&3.
7. AV 30 TAC 290 Failure to maintain functioning upper fan in gas chlorine room.
8. AV 30 TAC 290 Failure to have working well meter on wells #1&2.
9. AV 30 TAC 290 Failure to properly maintain the grounds.
10. RR Please provide a copy of the NSF certification for gas chlorine.
11. RR Please provide the most recent well meter calibration records.
12. AI Please update drought contingency plan.

City of Italy
101 W. Main
Italy, Texas 76651

Violations Responses

I. Failure to maintain Plant Operations Manual

A. The Plant Operations Manual has been updated and is on file.

II. Failure to maintain a Monitoring Plan

A. The Monitoring Plan has been updated and is on file.

III. Failure to maintain the backflow prevention test results.

A. The Backflow Prevention Assembly Test and Maintenance Report and copies of the letters sent to addresses requiring backflow assemblies are on file with the Director of Public Works.

IV. Failure to maintain calibration records for the Hach Colorimeter.

A. The City of Italy primarily uses a Hach Color Wheel but will start calibrating our Colorimeter and keeping said calibrations on file.

V. Failure to properly seal the well head on well #3

A. See Appendix 1

VI. Failures to properly maintain the concrete sealing block on wells #2 and #3.

A. The sealing block for both wells will be rehabbed after the insurance company releases the city to do so. Well #3 will be done first then Well #2.

VII. Failure to maintain functioning upper fan in gas chlorine room.

A. The gas chlorine room is under construction and is slated to be moved to a new location. See Appendix 2.

VIII. Failure to have a working well meter on Wells #1 and #2.

A. The City has contracted to have the meters repaired. The invoice for these repairs is on file with the Public Works Director. See Appendix 3 for documentation of damage and needed repairs.

IX. Failure to properly maintain the grounds.

A. The City is under construction adding a half million gallon concrete clearwell, SCADA piping, a cooling tower and a chemical room at this location. See Appendix 4. MSDS Sheets on file with Director of Public Works.

X. NSF certification for gas chlorine not available.

A. NSF Sheets on file with Director of Public Works.

XI. No copy available of most recent well meter calibrations.

A. Current well meter calibrations are on file with the Public Works Director.

XII. Updated Drought Contingency Plan

A. The Drought Contingency Plan must be voted on by the City Council. This plan requires penalties be assessed and the City Council must vote on what those penalties will be. An updated plan is being drafted to put before the City Council for a vote. This process may take several months to complete.

The City of Italy

Plant Operations Manual

1/25/2013

The City of Italy serves a population of 2160 with 739 connections with three wells, one in Woodbend and two in the trinity aquifer. The water system is disinfected by a vacuum chlorination system with ISO 150 pound cylinder at a residual of 0.2 mgL of free chlorine. There is one 7500 gallon clear well, one 200,000 gallon ground storage clear well and one 300,000 gallon elevated tank. The pump system includes 3-25 hrs jockey pumps and 2-50 hrs booster pumps. All of the system is operated by SCADA.

1. Daily Rounds

Daily Rounds-Water Department						
Well readings						
Well #1		Time		On		Off
Well #2		Time		On		Off
Well #3		Time		On		Off

Contract Meters #1 _____ #2 _____

Clear well Level _____

Pump Stations

A	413 Clark Ice House				
B	Pump #1	On	_____	Off	_____
C	Pump #2	On	_____	Off	_____
D	Pump #3	On	_____	Off	_____
E	Pump Station Master Meter		_____		
	Pump Station Boosters				
	A #1 Pump	50 Hrs			
	B #2 Pump	50 hrs			

Master Meter Read _____

*All rounds start at 8:00 am. Prior to starting rounds all personnel are required to check the SCADA system for any problems (alarms, pumpage, wells down, storage tank down, elevated down).

2.

a.

	Tank Levels		Residuals	PSI
Barn				
Clear Well				
Ground Storage				
Elevated Tower				

b. Cooling Tower On ☐ Off ☐

c. 413 Clark St

		Weight	Before	After	Use
Chlorine	#1				
Scales	#2				

d. Daily Residual (sample sites)

Chlorine Residual #1 _____ Address _____

Chlorine Residual #2 _____ Address _____

3. Fill in Monthly Water Production Log. Blanks are in the computer and completed files are kept in cabinet marked Monthly Water Production.
4.
   a. Work Orders will be generated from City Hall. Personnel assigned to WO are to complete orders and fill out Work Order Request stating what work was done (i.e., water leak – checked for location and scope of leak, completed repairs to pipe)and file is to be turned in to Public Works Director to be filed.
   b. The City will pull B.T.'s each month using the addressees below:
      i. 516 Waco
      ii. 409 Venice
      iii. 621 Cherie
      iv. 512 Rankin
      v. 400 S. Ward
   c. The sample site map will remain posted. It is important to alternate each site.
   d. B.T.'s will go to:

      Environmental Monitoring Lab
      6145 S. HWY 171
      Hillsboro, Texas, 76645
      254-582-2622

5. Disinfectant Level Quarterly Operating Report (DL-QOR).
6. Keep Mapping up -to -date at all times.
7. Work Values system.
8. Perform flushing on a monthly basis and report.
9. Keep Monitoring Plan up-to-date as a reference.
10. Keep all grounds clean and entrance resistant.
11. Keep all files and paperwork in order and organized on a daily basis.
12. Keep the Department updated to TCEQ's and EPA rules and regulations.

THE CITY OF ITALY

Monitoring Plan

Public Works ID 0706028

Responsible Official Mayor Frank Jackson

Director of Public Works Dean Carrell

I. The City of Italy operates a public water system that is ground water based from the Trinity and Woodbend aquifers. The city has a current population of 2160 with 739 connections.

a. There are three raw water samplings:

i. Well #1

ii. Well #2

iii. Well #3

1. In plant sampling

b. There are no water treatments other than chlorination through the use of ISO cylinders with gas chlorine.

c. Entry point sampling

Entry	Sample Site	Source	Plant Name
001	Sample tap at 75,000 ground clean well	Trinity/Woodbind	Wells 1,2,3
002	Sample site at 2,000 gallon ground storage tank	Trinity/Woodbind	Wells 1,2,3
003	Sample site at 3,000 ths elevated	Trinity/Woodbind	Wells 1,2,3

Table 1

Coli form and Disinfection Monitoring Sites		
A	516 Waco	
B	409 Venice	
C	621 Cherie	
D	512 Rankin	
E	40 S. Ward	

Table 2