



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

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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

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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 MI-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:

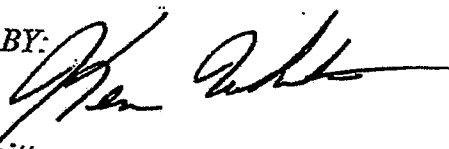
HIGH FLOW: 176gpm

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: 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

DeAnn C.

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: January 16, 2013

TO: City of Avalon

METER LOCATION: Wastewater Plant

METER BRAND: Sensus

SIZE: 1 1/2"

TYPE: Turbine

SERIAL NUMBER: 46386435

START READING: 25435800

END READING: 25435900

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: 14gpm

QUANTITY: 100gal

ACCURACY: 99.5%

COMMENTS: This Meter is within AWWA Standards.

TESTED BY:


Ken Whitsitt

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20 20

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Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



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

The Honorable Frank Jackson
Page 2
February 14, 2013

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

Investigation #

1053031

Investigation Date: 01/14/2013

Additional ID(s): 0700028

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(I)

Alleged Violation:
Investigation: 1053031

Comment Date: 02/01/2013

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

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 plan 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 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.

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

Regulated Entity/Site Name	City of Dallas			TCEQ Add. ID No. RN No. (optional)	07000028
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Relating
Regulated Entity Contact	Dean Carroll			Telephone No.	972.483.7327
Title	Public Works Director			Fax No.	
				Date Contacted	1/14/13
				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 TCEQ 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.	Description of Issue
No.	Type ¹	Rule Citation (if known)	
1	AV	30 TAC 290	Failure to maintain a plant operations manual. ✓
2	AV	30 TAC 250	Failure to maintain a monitoring plan. ✓
3	AV	30 TAC 310	Failure to maintain the backflow prevention test results. ✓
4	AV	30 TAC 290	Failure to maintain calibration records for the Hatch colorimeter. ✓
5	AV	30 TAC 290	Failure to properly seal the wellhead on well #3.
6	AV	30 TAC 250	Failure to properly maintain the concrete sealing block on well #2 & 3.
7	AV	30 TAC 290	Failure to maintain functioning upper fan in gas chlorine room.

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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	RECEIVED
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

JAN 30 2013

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated 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 Carroll	1-14-13

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-2006 (Rev. 6/07)

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

Regulated Entity/Site Name		City of Ataly		TCEQ Add. ID No.	0700028
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Routine
Regulated Entity Contact	Dean Carroll	Telephone No.		Date Contacted	4/4/13
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 TCEQ 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
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 gauges ✓
10	PR Please provide a copy of the most recent well meter calibration ✓
11	PR Please provide a copy of the most recent well meter calibration ✓
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 associated 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) Dean Carroll Date 4-4-13

Regulated Entity Representative Name (Signed & Printed) Dean Carroll Date 4-4-13

Texas Commission on Environmental Quality Investigation Report

PWS/0700028/CO

City of Italy
CN600460026

CITY OF ITALY PWS

Investigation # 1053031
Investigator: CRYSTAL WATKINS

RN101402782

Incident #

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

Principal(s) :

Role	Name
RESPONDENT	CITY OF ITALY

Contact(s) :

Role	Title	Name	Phone
Notified	CONTRACT OPERATOR	MR DEAN CARRELL	Fax (972) 483-2800 Work (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

PWS EMERGENCY POWER INITIATIVE
PWS INVESTIGATION - EQUIPMENT MONITORING
AND SAMPLING

Unit Name

CITY OF ITALY
CITY OF ITALY

COPY

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 02/14/2013 Method 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(I)

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(I) 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 plan 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
Environmental Investigator

Date 2/1/13

Signed [Signature]
Supervisor

Date 2/8/13

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : NDV

☐ Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ NOR

☒ Maps, Plans, Sketches

☒ Photographs

☒ Correspondence from the facility

☐ Other (specify) :

- Updated IWWO

- 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: 01/01/2012 to 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	Ts/Est. 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			

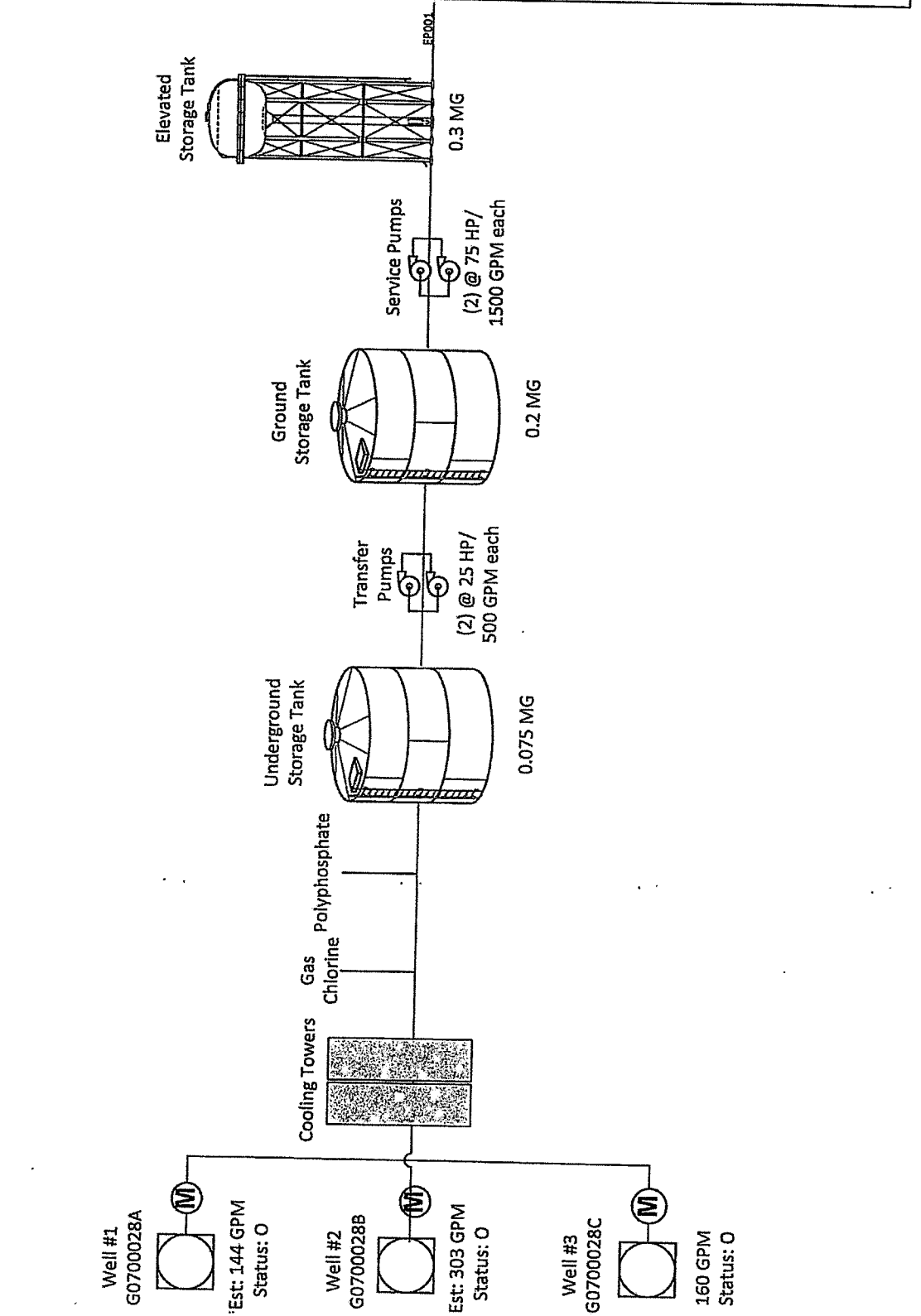
City of Italy

PWS ID# 0700028

Investigation Date: 01/14/2013

Investigator: Crystal Watkins

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

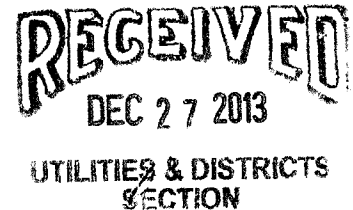


WILLATT & FLICKINGER
ATTORNEYS AT LAW

2001 NORTH LAMAR • AUSTIN, TEXAS 78705 • (512) 476-6604 • FAX (512) 469-9148

December 20, 2013

Ms. Mary Damron
TCEQ, MC 153
Utilities & Districts Section
Water Supply Division
P.O. Box 13087
Austin, Texas 78711-3087



Re: City of Italy Water CCN Amendment

Dear Mary:

Pursuant to your conversation with Jeniffer Concienne in our office, please find enclosed four (4) copies of the revised proposed water CCN area, and four (4) copies of the site location.

Please find also enclosed a CD showing the revised boundary application. *- in map file*

Please consider this to be an amendment to the City's application.

Please advise if anything further is required.

Very truly yours,

A handwritten signature in black ink that reads "Mike Willatt". The signature is written in a cursive, slightly slanted style.

Mike Willatt

MW
Enclosures

cc: Mr. Dean Carrell
Mr. Scott Hoelzle
(w/o enclosures)

(Via Electronic Transmission Only)

NON – SCANABLE

PAGE

MULTIPLE MAPS IN FILE

FOR ANY QUESTIONS

PLEASE CALL CENTRAL RECORDS

MAIN LINE (512) 936-7180

**NON – SCANABLE
PAGE**

MULTIPLE CD'S IN FILE

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