



Control Number: 42961



Item Number: 29

Addendum StartPage: 0

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REQUEST OF GREENWOOD WATER §
CORPORATION FOR APPROVAL OF §
WATER UTILITY STOCK TRANSFER §
CCN NO. 11792 §

PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

Permian Basin Water Resources, LLC's
Petition for Release of Financial Assurance

To: The Executive Director of the Public Utility Commission:

COMES NOW Permian Basin Water Resources, LLC ("Permian"), and files this Petition for Release of Financial Assurance and would show the following:

The Order entered in this proceeding on June 19, 2015, provides, that within 45 days of the date of the Order, Permian shall post a letter of credit with the Commission in the amount of \$20,000.00 as financial assurance to ensure the remediation of the issues arising from the Texas Commission on Environmental Quality's comprehensive compliance investigation. Permian posted the letter of credit on July 27, 2015, as required by the Order.

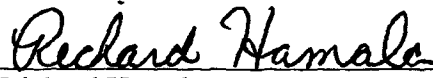
The Order also provided that Permian shall file a report with the Commission upon Greenwood or Permian receiving written confirmation from the TCEQ that the comprehensive compliance investigation issues have been completely resolved. The Order further provided that Permian shall maintain any letter of credit required under the Order until Permian petitions the Commission's Executive Director, and receives approval from the Commission's Executive Director to release the letter of credit.

Attached to this Petition is the affidavit of Richard M. Oller, engineer for Greenwood Water Corporation, along with a letter dated April 14, 2017, from the Texas Commission on Environmental Quality regarding the Greenwood Water System. In the affidavit, Mr. Oller reports that the wells and reverse osmosis treatment units that were listed in the investigation report have been approved for use. Mr. Oller also confirms that the comprehensive compliance investigation issues have been resolved as evidenced by the April 14, 2017 letter from the Texas Commission on Environmental Quality.

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Wherefore, premises considered, Permian respectfully requests that the Commission's Executive Director grant approval for the release of the letter of credit that was posted by Permian on July 27, 2015.

Respectfully submitted,

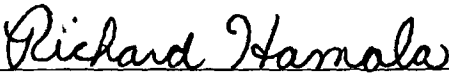


Richard Hamala
Richard Hamala
State Bar No. 08810750
TIEMANN, SHAHADY & HAMALA, P.C.
102 N. Railroad Ave.
Pflugerville, Texas 78660
(512) 251-1920 (telephone)
(512) 251-8540 (facsimile)

ATTORNEY FOR PERMIAN BASIN
WATER RESOURCES, LLC

Certificate of Service

I certify that a copy of this document was served on all parties of record in this proceeding on June 1, 2017, by regular mail, facsimile transmission, or hand delivery.



Richard Hamala

PUC DOCKET NO. 42961

REQUEST OF GREENWOOD WATER § PUBLIC UTILITY COMMISSION
CORPORATION FOR APPROVAL OF §
WATER UTILITY STOCK TRANSFER § OF TEXAS
CCN NO. 11792 §

AFFIDAVIT OF ENGINEER

THE STATE OF TEXAS §
§
COUNTY OF LUBBOCK §

BEFORE ME, the undersigned authority, on this day personally appeared Richard M. Oller, who being by me first duly sworn, on oath, deposed and stated as follows:

1. My name is Richard M. Oller. I am a Registered Professional Engineer, State of Texas # 61831. I have been retained as an engineering consultant for Greenwood Water Corporation, and in such capacity, I have worked to resolve the compliance issues resulting from the Comprehensive Compliance Investigation of Public Water Supply at: Greenwood Water System, Midland County, Texas, RN101439040, TCEQ Public Water Supply: 1650078. The comprehensive compliance investigation was conducted by the Texas Commission on Environmental Quality (TCEQ) during February 2014.
2. I am competent to make this affidavit, I have personal knowledge of the statements made herein, and all statements made and matters set forth herein are true and correct.
3. The compliance issues stated in the report of the February 2014 comprehensive compliance investigation are as follows: **“Submittal of completion paperwork for new wells A and B and associated reverse osmosis treatment systems and request for final samples for new wells A and B.”**
4. I am personally familiar with the information and requests for exceptions that have been submitted to the TCEQ on behalf of Greenwood Water Corporation to address and resolve the compliance issues resulting from the February 2014 comprehensive compliance investigation.

5. In April 2017, I received a letter dated April 14, 2017, from the TCEQ regarding:

Greenwood Water System – Public Water System ID No. 1650078

As built submittal for:

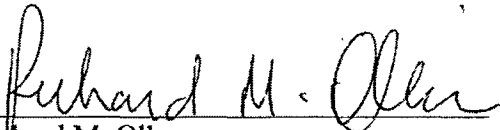
Well "A" Completion and RO Treatment Unit

Well "B" Completion and RO Treatment Unit

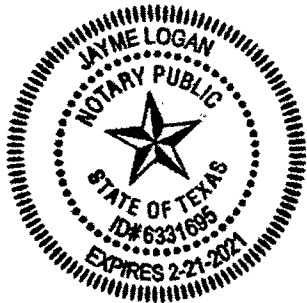
A copy of the April 14, 2017 TCEQ letter is attached to this Affidavit. The April 14, 2017 TCEQ letter summarizes the information and requests for exceptions that have been submitted to the TCEQ to address and resolve the compliance issues resulting from the February 2014 comprehensive compliance investigation. The April 14, 2017 TCEQ letter approves the wells and reverse osmosis treatment units for use in accordance with typical requirements for all public water systems.

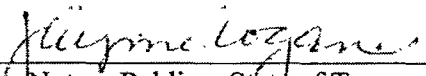
6. The April 14, 2017 TCEQ letter constitutes written confirmation from the TCEQ that the comprehensive compliance investigation issues have been resolved.

FURTHER AFFIANT SAYETH NOT.


Richard M. Oller

SUBSCRIBED AND SWORN TO BEFORE ME ON June 1, 2017,
by Richard M. Oller,




Notary Public – State of Texas

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Nicemann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

PWS_1650078_CO_20170414_Plan Ltr

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 14, 2017

Mr. Rich Oller, P.E.
Oller Engineering, Inc.
1212 13th Street
Lubbock, Texas 79401



Rc: Greenwood Water System - Public Water System ID No. 1650078
As-built submittal for:
Well "A" Completion and RO Treatment Unit
Well "B" Completion and RO Treatment Unit
Engineer Contact Telephone: (806) 993-6226
Plan Review Log No. P-02132017-088
Midland County, Texas

CN600664528; RN101439040

Dear Mr. Oller:

On February 13, 2017, the Texas Commission on Environmental Quality (TCEQ) received as-built material with your letter dated January 9, 2017 for the completion of Wells A & B and as-built reverse osmosis (RO) treatment units at each well. Based on our review of the information submitted, the project generally meets the minimum requirements of Title 30 Texas Administrative Code (TAC) Chapter 290 - Rules and Regulations for Public Water Systems and the constructed well is **approved for use** based on the conditions noted below and may now be **temporarily** placed into service. The well's continued use is contingent upon the following conditions:

1. The chemical analysis report shows that the concentration of **arsenic** in the both Well A and B water samples exceeded the maximum contaminant level (MCL) (see table for Well A and table for Well B). To address the exceedance of the MCL, the Greenwood Water System has provided documentation of an as-built constructed RO treatment system at Well A and one at Well B. A sample of the final blend (see table for blend below) shows compliance with the arsenic MCL. The system is approved for blending 80% RO Permeate from wells A & B with 20% water from previously approved wells 5 & 6.
2. The chemical analysis report shows that the concentration of **gross alpha** in the Well B water sample exceeded the maximum contaminant level (MCL) (see table for Well B). To address the exceedance of the MCL, the Greenwood Water System has provided documentation of an as-built constructed RO treatment system at Well B. A sample of the final blend (see table for blend below) shows compliance with the gross alpha MCL. The system is approved for blending 80% RO Permeate from wells A & B with 20% water from previously approved wells 5 & 6.

3. The chemical analysis report submitted shows that for both Well A & B the concentration(s) of **Chloride, Fluoride, Sulfate, and Total Dissolved Solids** exceed the secondary constituent level (SCL) (see table for Well A and table for Well B). To address the exceedance of the SCL, the Greenwood Water System has provided documentation of an as-built constructed RO treatment system at Well A and one at Well B. A sample of the final blend (see table for blend below) shows compliance with the above four SCL's. The system is approved for blending 80% RO Permeate from wells A & B with 20% water from previously approved wells 5 & 6.
4. The system is required to comply with all requirements of the exceptions letters issued by the TCEQ for this facility: Exception for Pressure Cementing Method for Well A & B April 22, 2016; and Exception for RO Membrane Pressure Measuring Rule issued February 16, 2017.
5. Disposal of any waste streams shall comply with state and federal requirements.
6. The radionuclide test results provided for raw wells A & B did not include the results for Uranium. Please provide a sample test of the raw water at Wells A & B for Uranium at the same time the report described in item 9 below is provided for corrosivity.
7. A representative of TCEQ's Drinking Water Quality Team will contact the public water system to arrange for the collection of the official chemical samples. It is the water systems responsibility to contact the **Drinking Water Quality Team at (512) 239-4691** if they have not had the official sample collection within **180 days** of the date of this letter.
8. If official chemical analysis testing confirms that a regulated constituent does not meet primary or secondary standards, additional treatment, blending, or public notice may be required. The Drinking Water Quality Team will notify the water system of any additional special requirements for this public water supply source. Plans for any proposed change in water treatment or adjustment in blending must be reviewed and approved by the Plan Review Team.
9. Water from Well "A" as permeate from the RO treatment system is presently combined with water from Well "B" RO permeate and untreated water from wells 5 and 6. The blended water samples from October 20, 2016 appear to be corrosive according to our calculations using four corrosive indices (Modified Larson's Ratio Langelier Saturation Index, Ryznar Stability Index and the Aggressive Index). Corrosive or aggressive water could result in aesthetic problems, increased levels of toxic metals, and deterioration of household plumbing and fixtures. The system installed caustic treatment at Well A & B following RO treatment in January of 2017 to address the corrosivity. This submittal constitutes notification of the addition of a new source as required by 30 TAC Section 290.117(i)(9)(B). In accordance with 30 TAC Section 290.117(d)(2)(E) systems that change treatment or have the addition or deletion of a source of water may be required by the TCEQ to conduct additional monitoring to ensure that the system maintains minimal levels of corrosion. Based upon this addition of a new source and caustic treatment, the TCEQ is removing any previous approvals for reduced Lead and Copper Rule monitoring frequency and requiring your system to return to routine sampling for two consecutive six-month periods. **The new two consecutive six-month sampling schedule will be changed to the next viable sampling period by a TCEQ lead and copper program coordinator.** If you have any questions or concerns about the new sampling schedule please contact the lead and copper program at 512-239-4691. Required monitoring is:

- a) **Routine Tap Sampling:** Lead and copper tap sampling during two consecutive six-month periods [290.117(c)(2)(A)(ii)].
- b) **Water Quality Parameter Sampling:** Water quality parameters (WQPs) monitoring at the frequency and locations in the following table and during the same timeframe as the two consecutive 6-month lead and copper tap sampling noted above.

| WQP List | Location | Frequency |
|--|---|-----------|
| <ul style="list-style-type: none"> • pH • Total Alkalinity (as CaCO₃) • Calcium • Calcium (as CaCO₃) • Chloride • Iron • Manganese • Sodium • Sulfate • Conductivity • TDS • temperature • orthophosphate or silica | Routine number of distribution sites and all entry points | Quarterly |

Note: Orthophosphate (measured as phosphate-phosphorous (PO₄-P)) must be measured only when an inhibitor containing a phosphate compound is used; inhibitors that contain phosphate include orthophosphate and polyphosphate. Silica must be measured only when an inhibitor containing silicate compound is used.

After successful monitoring with no Action Levels Exceedances you will eligible to have a reduced monitoring schedule again if new sources or new treatment are not added.

As stated above, WQPs will be required for all entry points and distributions sites during four quarters during the two consecutive 6-month lead and copper tap sampling. Please provide a signed and sealed engineering report (see attached engineering report outline guidance) within 4 months of the start date of the first six month period on the results of the first quarter of WQP samples and the first six-month tap sample results and a discussion on the corrosiveness of the treated water from the change in treatment. The report shall be submitted to:

Vera Poe, P.E.
 Plan Review Team, MC-159
 Texas Commission on Environmental Quality
 P.O. Box 13087
 Austin, Texas 78711-3087

The well completion data for Well "A" and RO system consisted of the following:

- Texas Department of Licensing and Regulations Well Report
- Well Latitude and Longitude: Lat. 31°59'44" N; Long. 101°53'44" W
- Driller's log (geologic log and material setting report);
- TCEQ Exception dated 4/22/2016 with reference to well cementation;
- 82-hour pumping test results;
- Documentation of ownership of all property within 150 feet of Well "A";
- U. S. Geological Survey 7.5 minute map showing the well location;
- Three bacteriological sampling results showing no coliform contamination from City of Odessa Laboratory on Feb 25, 2013, Feb 26, 2013, and Feb 27, 2013;
- Chemical analysis results from Environmental Laboratory Services for Well "A" dated July 18, 2016 (sample results are enclosed); and,
- Radionuclide test results from Trace Analysis, Inc. for Well "A" dated April 6, 2017.

| Primary Contaminants | | |
|-----------------------------|-------------------|----------------|
| Contaminant | MCL (mg/L) | Results |
| Arsenic | 0.01 | 0.021 |
| Fluoride | 4.0 | 3.06 |
| Nitrate | 10 (as N) | 9.27 |
| Nitrite | 1 (as N) | <0.1 |

| Secondary Contaminants | | |
|-------------------------------|--------------------|----------------|
| Contaminant | SCL (mg/L) | Results |
| Aluminum | 0.2 | <0.01 |
| Chloride | 300 | 493 |
| Copper | 1.0 | 0.00134 |
| Fluoride | 2.0 | 3.06 |
| Iron | 0.3 | <0.05 |
| Manganese | 0.05 | <0.001 |
| pH | ≥7 (Standard Unit) | 7.4 |
| Sulfate | 300 | 681 |
| Total Dissolved Solids | 1,000 | 1780 |
| Zinc | 5.0 | 0.0263 |

| Radionuclide Contaminants | | |
|----------------------------------|------------|----------------|
| Contaminant | MCL | Results |
| Gross alpha | 15 pCi/L | 2.94 |
| Beta Particle | 50 pCi/L | 9.69 |
| Radium-226/228 | 5 pCi/l. | 0.649 |
| Uranium | 30 µg/L | Not included |

The well completion data for Well "A" and RO system describes construction of the following:

- One (1) as-built public water supply well drilled to 182 feet with 92 linear feet (lf) of 8-inch diameter Polyvinyl Chloride (PVC) casing and pressure-cemented 92 lf, and 10 foot bentonite seal;
- 60 lf of 8-inch PVC slot screen, 20 lf of 8-inch blank PVC liner, with 80 lf gravel pack;
- The well is rated for 148 gallons per minute (gpm) yield with a 20 horsepower submersible pump. The design capacity of the pump is 148 gpm at 375 feet total dynamic head;
- One (1) as-built 5 Micron cartridge filter after well;
- One (1) as-built GE Hypersperse MSI410 anti-scalant system (NSF 60 approved) with 0.5 gallon per hour pump and 55 gallon mixing tank;
- Two (2) as-built 5 micron cartridge filters after anti-scalant injection and prior to RO skid;
- One (1) as-built 1 micron cartridge filter on RO skid;
- One (1) as-built skid mounted, three stage (3:2:2 array) single pass, 108,000 gallon per day GE E8 Series 60 Hz RO system with three GE AG8040F-400 membranes per vessel (112 gpm feed, 37 gpm concentrate, 75 gpm permeate);
- The submittal documents show a "Clean in Place" (CIP) system as part of the installed RO skid. The engineer has stated that this CIP system has been disconnected. Fowled RO membranes are returned to the manufacturer for cleaning;
- One (1) as-built caustic feed system consisting of a diaphragm 2 gallon per hour chemical feed pump (with one standby pump) and a 55 gallon mixing tank;
- One (1) as-built 1,000 gallon permeate tank;
- One (1) as-built 80 gpm service pump;
- One (1) as-built 200,000 gallon waste tank to store concentrate from wells A & B;
- 3,400 linear feet of as-built AWWA C900 DR 18 235 psi 6-inch PVC transmission main from well field to intersection of County Road 120 and FM 1379 (blending point);
- As-built connection to blending water from Wells 5 and 6 (70% from well A & B RO systems, 30% from untreated well 5 & 6);
- 10,600 linear feet of as-built AWWA C900 DR 18 235 psi 6-inch PVC transmission main from blend connection to water plant ground storage tank; and,
- Various valves, fittings, and related appurtenances.

The well completion data for Well B consisted of the following:

- Texas Department of Licensing and Regulations Well Report;
- Well Latitude and Longitude: Lat. 31° 59' 44" N; Long. 101° 53' 40" W
- Driller's log (geologic log and material setting report);
- TCEQ Exception dated 4/22/2016 with reference to well cementation;
- 80-hour pumping test results;
- Documentation of ownership of all property within 150 feet of Well "A";
- U.S. Geological Survey 7.5 minute map showing the well location;
- Three bacteriological sampling results showing no coliform contamination from City of Odessa Laboratory on June 9, 2014; June 10, 2014 and June 11, 2014;
- Chemical analysis results from Environmental Laboratory Services dated July 28, 2016 (sample results are enclosed); and,
- Radionuclide test results from Trace Analysis, Inc. for Well "B" dated April 6, 2017.

| Primary Contaminants | | |
|-----------------------------|-------------------|----------------|
| Contaminant | MCL (mg/L) | Results |
| Arsenic | 0.01 | 0.0227 |
| Fluoride | 4.0 | 3.28 |
| Nitrate | 10 (as N) | 9.18 |
| Nitrite | 1 (as N) | <0.1 |

| Secondary Contaminants | | |
|-------------------------------|--------------------|----------------|
| Contaminant | SCL (mg/L) | Results |
| Aluminum | 0.2 | <0.01 |
| Chloride | 300 | 467 |
| Copper | 1.0 | 0.001 |
| Fluoride | 2.0 | 3.28 |
| Iron | 0.3 | <0.05 |
| Manganese | 0.05 | <0.001 |
| pH | ≥7 (Standard Unit) | 7.44 |
| Sulfate | 300 | 627 |
| Total Dissolved Solids | 1,000 | 1700 |
| Zinc | 5.0 | 0.0151 |

| Radionuclide Contaminants | | |
|----------------------------------|------------|----------------|
| Contaminant | MCL | Results |
| Gross alpha | 15 pCi/L | 15.3 |
| Beta Particle | 50 pCi/L | 14.4 |
| Radium-226/228 | 5 pCi/L | 0.964 |
| Uranium | 30 µg/L | Not included |

The well completion data for Well "B" and RO system describes construction of the following:

- One (1) as-built public water supply well drilled to 179 feet with 95 linear feet (lf) of 6-inch PVC casing, pressure-cemented 95 lf and 10 foot bentonite seal;
- 40 lf of 6-inch PVC slot screen, 44 lf of 6-inch blank PVC liner, with no underream and 74 lf gravel pack;
- The well is rated for 120 gallons per minute (gpm) yield with a 15 horsepower 5.5-inch 8 stage submersible pump. The design capacity of the pump is 120 gpm at 375 feet total dynamic head;
- Two (2) as-built 5 micron cartridge filters;
- One (1) as-built GE Hypersperse MSI410 anti-scalant system (NSF 60 approved) with 0.5 gallon per hour pump and 55 gallon tank;
- One (1) as-built 1 micron cartridge filter on RO skid;
- One (1) as-built skid mounted, three stage (3:2:2 array) single pass, 108,000 gallon per day GE E8 Series 60 Hz RO system with three GE AG8040F-400 membranes per vessel (112 gpm feed, 37 gpm concentrate, 75 gpm permeate);
- The submittal documents show a "Clean in Place" (CIP) system as part of the installed RO skid. The engineer has stated that this CIP system has been disconnected. Fowled RO membranes are returned to the manufacturer for cleaning;
- One (1) as-built caustic feed system consisting of one (1) diaphragm 2 gallon per hour chemical feed pump (with one standby pump) and a 55 gallon mixing tank;
- One (1) as-built 1,000 gallon permeate tank;
- One (1) as-built 80 gpm service pump;
- 3,400 linear feet of as-built AWWA C900 DR 18 235 psi 6-inch PVC transmission main from well field to intersection of County Road 120 and FM 1379 (blending point);
- As-built connection to blending water from Wells 5 and 6 (70% from well A & B RO systems, 30% from untreated well 5 & 6);
- 10,600 linear feet of as-built AWWA C900 DR 18 235 psi 6-inch PVC transmission main from blend connection to water plant ground storage tank; and,
- Various valves, fittings, and related appurtenances.

Blend Chemical Results:

- Chemical analysis results from Environmental Laboratory Services dated July 18, 2016 for the blend of water from Wells "A" and "B" and from wells 5 and 6. (sample results are enclosed);
- Radionuclide test results from Pace Analytical for Blend dated October 31, 2016.

| Primary Contaminants | | |
|----------------------|------------|----------|
| Contaminant | MCL (mg/L) | Results |
| Arsenic | 0.01 | <0.00536 |
| Fluoride | 4.0 | 0.766 |
| Nitrate | 10 (as N) | 1.79 |
| Nitrite | 1 (as N) | <0.0325 |

| Secondary Contaminants | | |
|------------------------|--------------------|-----------|
| Contaminant | SCL (mg/L) | Results |
| Aluminum | 0.2 | <0.00469 |
| Chloride | 300 | 62 |
| Copper | 1.0 | 0.018 |
| Fluoride | 2.0 | 0.766 |
| Iron | 0.3 | <0.007 |
| Manganese | 0.05 | <0.000382 |
| pH | ≥7 (Standard Unit) | 7.26 |
| Sulfate | 300 | 42.8 |
| Total Dissolved Solids | 1,000 | 222 |
| Zinc | 5.0 | 0.008 |

| Radionuclide Contaminants | | |
|---------------------------|----------|---------|
| Contaminant | MCL | Results |
| Gross alpha | 15 pCi/L | 1.11 |
| Beta Particle | 50 pCi/L | 1.12 |
| Radium-226/228 | 5 pCi/L | 0.0867 |
| Uranium | 30 µg/L | <17 |

| Corrosive Water Parameters | |
|---------------------------------|---------------|
| Parameter | Result (mg/L) |
| Alkalinity as CaCO ₃ | 42.3 |
| Calcium as CaCO ₃ | 59.4 |
| Sodium | 37.6 |
| Lead | <0.00276 |

The Greenwood Water System public water system provides water treatment.

The project is located 0.5 miles west of the intersection of County Road 120 and FM 1379 in Midland County, Texas.

Texas Water Code Section 36.0015 allows for the creation of groundwater conservation districts (GCDs) as the preferred method of groundwater management. GCDs manage groundwater in many counties and are authorized to regulate production and spacing of water wells. **Public water systems drilling wells within an existing GCD are responsible for meeting the GCD's requirements.** The authorization provided in this letter does not affect GCD authority to manage groundwater or issue permits.

The well was approved for construction in our August 27, 2012 letter (Plan Review Log No. P-07232012-109).

It appears that this well, by its location, geological attributes and/or construction details, may meet the definition of "groundwater under the direct influence of surface water (GUI)". The public water system is required to submit raw water samples for bacteriological analysis once a month for twenty-four (24) months. This monitoring requirement will be in effect beginning the month the well is put into use and continue for twenty-four (24) months. If the well is offline for any given month during the required monitoring period please submit an email along with documentation (well production logs, repair reports, etc.) to GWRdata@tceq.texas.gov. A sample is required for 24 consecutive months even if the well is offline and not in service. Samples must be collected prior to disinfection, identified as sample type "Raw Well", and submitted to a TCEQ laboratory accredited to perform the required analysis in accordance with 30 TAC §25 of the TCEQ rules. The sampling procedure should be the same as the one used when collecting routine distribution samples. Please ensure that the sample is delivered to the laboratory clearly labeled with the well's TCEQ Source Code and marked as sample type "Raw Well". The TCEQ source code should be entered in the Sample Identification/Location box (the same area where an address is entered on the lab form for a regular distribution sample). The well's TCEQ Source Code can be found in TCEQ's Drinking Water Watch database at:

<http://dww2.tceq.state.tx.us/DWW/>

If the well is determined to be a GUI, treatment processes shall be designed to achieve at least a 2-log removal of Cryptosporidium oocysts, a 3-log removal or inactivation of Giardia cysts, and a 4-log removal or inactivation of viruses before the water is supplied to any consumer. Based on raw water monitoring results, the executive director may require additional levels of treatment for Cryptosporidium as specified in §290.111 relating to Surface Water Treatment. The public water system must keep the sample reports with their records for review by TCEQ personnel upon request. If these samples suggest additional treatment or testing is necessary, TCEQ will notify the public water system.

Please refer to the Plan Review Team's Log No. P-02132017-088 in all correspondence for this project.

Please Note for future submittals: In order to determine if a new source of water or a new treatment process results in corrosive or aggressive finished water that may endanger human health, we are requesting additional sampling and analysis of lead, alkalinity (as calcium carbonate), calcium (as calcium carbonate) and sodium in addition to the required chemical test results for public water system new sources. We are requiring these additional sampling results as listed in our currently revised checklists (Public Well Completion Data Checklist for Interim Use - Step 2 and Membrane Use Checklist - Step 2) which can be found on TCEQ's website at the following address:

<https://www.tceq.texas.gov/drinkingwater/udpubs.html>

Please include these additional sampling results in well completion submittals, membrane use submittals, and other treatment process submittals.

New surface water sources will need to also include lead, total dissolved solids, pH, alkalinity (as calcium carbonate), chloride, sulfate, calcium (as calcium carbonate) and sodium with the analysis required in 30 TAC Section 290.41(e)(1)(F).

Please complete a copy of the most current Public Water System Plan Review Submittal form for any future submittals to TCEQ. Every blank on the form must be completed to minimize any

Mr. Rich Oller, P.E.
Page 10
April 14, 2017

delays in the review of your project. The document is available on TCEQ's website at the address shown below. You can also download the most current plan submittal checklists and forms from the same address.

<https://www.tceq.texas.gov/drinkingwater/udpubs.html>

For future reference, you can review part of the Plan Review Team's database to see if we have received your project. This is available on TCEQ's website at the following address:

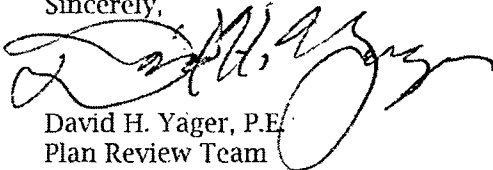
<https://www.tceq.texas.gov/drinkingwater/planrev.html/#status>

You can download the latest revision of 30 TAC Chapter 290 - Rules and Regulations for Public Water Systems from this site.

If you have any questions concerning this letter or need further assistance, please contact David Yager at 512-239-0605 or by email at David.Yager@Tceq.Texas.Gov or by correspondence at the following address:

Plan Review Team, MC-159
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Sincerely,



David H. Yager, P.E.
Plan Review Team
Plan and Technical Review Section
Water Supply Division
Texas Commission on Environmental Quality



Vera Poc, P.E., Team Leader
Plan Review Team
Plan and Technical Review Section
Water Supply Division
Texas Commission on Environmental Quality

VP/DY/kp

Enclosure: Sample Results
TCEQ Exception for Pressure Cementing Method for Well A April 22, 2016
TCEQ Exception for Pressure Cementing Method for Well B April 22, 2016
TCEQ Exception for RO Membrane Pressure Measuring Rule, February 16, 2017

cc: Greenwood Water System, Attn: Mike Zipprich, 7144 East Stetson Drive Suite C-200,
Scottsdale, Arizona 85251-3260