



Control Number: 44028



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# GARCIA & WRIGHT

CONSULTING ENGINEERS, INC.

Registration No. F-1802

January 18, 2016

2016 JAN 19 AM 9:37

PUBLIC UTILITY COMMISSION  
FILING CLERK


Filing Clerk  
Public Utility Commission of Texas  
P.O. Box 13326  
Austin, TX 78711-3326

Re: Docket No. 44028  
Application of the City of Three Rivers  
to Amend Certificate of Convenience and Necessity  
in Live Oak County (3700-C)  
CCN# 12642

On behalf of the City of Three Rivers and in response to the staff comments of Docket No. 44028, Commission Staff's 3<sup>rd</sup> RFI, attached are an original and three (3) copies to staff question 3-1 with attachments.

Please let us know should you need any further information.

Sincerely,



Raul H. Garcia P.E

RHG/vl

Encl: As

cc: Rosie Forehand, City Administrator w/encl.  
City of Three Rivers

39

407 W. RHAPSODY

SAN ANTONIO, TEXAS 78216-3111

(210) 349-5253  
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**DOCKET NO. 44028**

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO THE CITY OF THREE RIVERS  
QUESTION NO. STAFF 3-1**

Staff 3-1

Please provide documentation demonstrating that compliance can be achieved with the Texas Commission on Environmental Quality (TCEQ) enforcement action concerning failure to initiate maintenance and housekeeping practices to ensure the good working condition of the automatic valve controlling the supplemental backwash, outstanding since August 12, 2011. Such documentation should include the following:

- a) A compliance plan, including both the "rule exception request" submitted to TCEQ and the City's plan to replace the valve in question if necessary, and

**Thomas Salazar, Water Plant Supervisor, City of Three Rivers has sent a letter to TCEQ requesting an exemption to 30 TAC 290.46 (f)(3)(A)(vi) to allow to manually backwash in lieu of replacing the automatic valve. Should TCEQ not allow the exemption, the City will have a contractor furnish and install the automatic valve. (See Copy of letter from Thomas Salazar attached)**

- b) Estimates of associated costs and the source of funding to pay those cost.

**Thomas Salazar's letter includes an estimate of cost in the amount of \$50,000.00 to replace the automatic valve.**

**Attached is a letter from Rocky Mendez, Director of Public Work, City of Three Rivers stating the Water Department would look in the possibility of funding the cost out of the City General Fund.**

# *CITY OF THREE RIVERS*

P.O. BOX 398  
THREE RIVERS, TX 78071  
(361)786-2528  
FAX (361)786-3281

Technical Review and Oversight Team  
Public Drinking Water Section, MC - 155  
Texas Commission on Environmental Quality  
Po Box 13087  
Austin, Texas 78711-3084

Dear TRO Team ,

At this time the City of Three Rivers is asking for an exemption for not replacing the automatic control valve. The valve failed open and the operators use an isolation valve on the storage tank manually to open and close the valve depending on the amount of supplemental water needed to perform a proper backwash. The valve in question has been manually operated for at least the last 15 years and we have not had any problems with backwashing the filters this way. We continue to meet the finished water NTU requirements through this process.

In May of 2007, Mr. Jack Schults and his team performed a filter performance and backwash profile study on our filters. At that time the automatic valve was not working and the operators would open the valve manually to perform the filters backwashing.

In May of 2010, the Corpus Christi Region Office conducted its yearly investigation of the Three Rivers Water Treatment Plant (PWS 1490002). We were cited for no meter devise to measure the treated water used to backwash the filters and to replace the automatic control valve. So the City installed a flow meter devise to measure the amount of water used. We spoke to the manufacture and they informed us that we could use the following formula to get the total number of gallons being used. We were told to calculate the water being used to backwash by multiplying the total gallons going thru the filter times the total minutes it takes to backwash the filter and that gives you the total gallons used.

On August 9, 2011 Public Works Director, Rocky Mendez and Retired Water Plant Supervisor Steven Bernal, met with Jack Schults to discuss the automatic valve. They spoke with him since he and his team had performed a filter performance and backwash profile study on our filters back in 2007. Mr. Schults agreed with us that based on our filter dimensions as long as we increase the raw water flow to guarantee 1,800 gpm or 12.5 gpm/ft 2 during a backwash or open the supplemental valve manually every time we backwashed and wrote a SOP to be kept in our Operation and Maintenance Manuel and that this would be enough to correct the violation.

We also now keep a log for the backwash flow rate and treated water volume that is calculated for each backwash. This log also contains the name of the operator, date, time, and the filter that was backwashed. These logs are kept on hand for a minimum period of two years from date of backwash as specified in 30TAC 290.46(f)(3)(A)(vi). The estimated cost to replace and correct the Automated Valve would exceed over \$50,000, and this is why the City is asking for an exemption to continue to use the valve on the storage tank manually to backwash. The \$50,000.00 could be used on other more important issues that the water department is facing at

this time. Any help you could provide us with on this matter is greatly appreciated. Thank you for your continued support on past and ongoing matters.

Sincerely

A handwritten signature in black ink, reading "Thomas Salazar". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

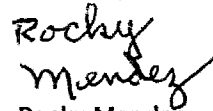
Thomas Salazar  
Water Plant Supervisor  
City of Three Rivers  
PO Box 398  
Three Rivers, TX 78071  
(361) 786 2528

City of Three Rivers  
PO Box 398  
Three Rivers, TX 78071  
Phone (361) 786-2528  
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Mr. Garcia

Should TCEQ deny our request for an exception to the replacement of the automatic filter backwash supplemental water valve, the water department would look in the possibility of funding the cost out of the City's General Fund.

Sincerely,

  
Rocky Mendez

Public Works Director

City of Three Rivers