



Control Number: 44523



Item Number: 36

Addendum StartPage: 0

PUC Docket No. 44523

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PUBLIC UTILITY COMMISSION  
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**APPLICATION OF THE CITY OF  
DRIPPING SPRINGS TO AMEND ITS  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY IN HAYS COUNTY**

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**THE CITY OF DRIPPING SPRINGS'  
RESPONSE TO ORDER NO. 11**

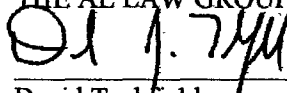
COMES NOW, The City of Dripping Springs (the "City") to respond to Order No. 11.

The City hereby supplements its application with this Response.

Attached to this response is the approval letter from the Texas Commission on  
Environmental Quality for a Public Water System.

Respectfully submitted,

THE AL LAW GROUP, PLLC



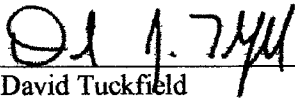
David Tuckfield  
State Bar No. 00795996  
12400 Highway 71 West  
Suite 350-150  
Austin, TX 78738  
(512) 576-2481  
(512) 366-9949 Facsimile  
[david@allawgrp.com](mailto:david@allawgrp.com)  
Counsel for the City of Dripping Springs

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on the following via facsimile in accordance with P.U.C. Proc. R. § 22.74 on this, the 31<sup>st</sup> day of August, 2016.

**For The Public Utilities Commission:**

Alexander Petak  
512-936-7377 (phone)  
512-936-7268 (facsimile)  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
Austin, Texas 78711-3326

  
\_\_\_\_\_  
David Tuckfield

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



PWS\_1050187\_CO\_20160815\_Plan Ltr  
PWS\_2270235\_CO\_20160815\_Plan Ltr

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 15, 2016

Mr. Robert P. Callegari, P.E.,  
CMA Engineering, Inc.  
235 Ledge Stone Drive  
Austin, TX 78737

Re: Blue Blazes - Public Water System ID No. 1050187  
Proposed Water Distribution System and Interconnect with West Travis County  
Regional PWS - ID No. 2270235  
Engineer Contact Telephone: (512) 432-1000  
Plan Review Log No. P-06162016-132  
Hays County, Texas

CN602491284; RN 109260885

Dear Mr. Callegari:

On June 16, 2016, the Texas Commission on Environmental Quality (TCEQ) received planning material with your letter dated August 15, 2016 for the proposed water distribution system and Interconnect with West Travis County Regional -PWS ID No. 2270235. Based on our review of the information submitted, the project generally meets the minimum requirements for a new Public Water System of Title 30 Texas Administrative Code (TAC) Chapter 290 - Rules and Regulations for Public Water Systems and is **conditionally approved for construction** if the project plans and specifications meet the following requirement(s):

According to our calculations using four corrosive indices (Modified Larson's Ratio Langelier Saturation Index, Ryznar Stability Index and the Aggressive Index), the source water from West Travis County Regional Water Supply (WTCRWS) appears to be slightly corrosive. Corrosive or aggressive water could result in aesthetic problems, increased levels of toxic metals, and deterioration of household plumbing and fixtures.

WTCRWS has conducted a corrosion control study (TCEQ letter enclosed) that addresses corrosivity issues particular to this water system. The report included recommendations for treatment with orthophosphates and requires additional monitoring.

As a new PWS, Blue Blazes is required to comply with the EPA lead and copper rule sampling protocols. You can contact Ms. Laurie Gehlsen at 512-239-4660 at TCEQ for additional information about this program.

**The Blue Blazes PWS may be required to provide additional treatment for their purchased water if monitoring indicates that the proposed WTCRWS treatment is not effective in providing acceptable corrosion control.**

Mr. Robert P. Callegari, P.E.  
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The submittal consisted of 40 sheets of engineering drawings and technical specifications. The approved project consists of:

- 660 linear feet (lf) of 12" American Water Works Association (AWWA) Standard C900 Dimension Ratio (DR) 14 polyvinyl chloride (PVC) temporary bypass water line;
- 240 lf 20" Class 250 AWWA Standard C 151 ductile iron water line;
- 85 lf AWWA Standard C900 6" DR 14 PVC water line; and
- 2,361 lf AWWA Standard C900 8" DR 14 PVC water line; and
- Various valves, fittings, and related appurtenances.

This approval is for the construction of the above listed items only. Any wastewater components contained in this design were not considered.

The Blue Blazes public water supply system purchases treated water from the West Travis County Regional Water System.

The project is located at the intersection of Blue Blazes Drive and U.S. Highway 290 West in Hays County, Texas.

An appointed engineer must notify the TCEQ's Region 11 Office in Austin at (512) 239-2929 when construction will start. Please keep in mind that upon completion of the water works project, the engineer or owner will notify the commission's Water Supply Division, in writing, as to its completion and attest to the fact that the completed work is substantially in accordance with the plans and change orders on file with the commission as required in 30 TAC §290.39(h)(3).

Please refer to the Plan Review Team's Log No. P-06162016-132 in all correspondence for this project.

**Please Note:** 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 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>

Mr. Robert P. Callegari, P.E.

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August 15, 2016

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:

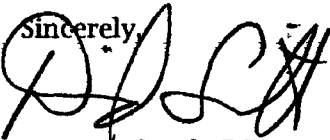
<https://www.tceq.texas.gov/drinkingwater/planrev.html/#status>

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 Smith at 512-239-4703 or by email at David.Smith@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 T. Smith, P.E.  
Plan Review Team  
Plan and Technical Review Section  
Water Supply Division  
Texas Commission on Environmental Quality



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

VP/DS/av

Enclosure: TCEQ letter dated December 9, 2015

cc: Blue Blazes PWS, Attn: Mr. Todd Purcell, P.O. Box 384, Dripping Springs, TX 78620-0384  
Mr. David Tuckfield, 12400 W. Hwy 71, Bee Cave, TX, 78746-6517  
Ms. Jacy Warwick, 3101 Bee Cave Road, Austin, TX, 78746  
Mr. Don Rauschuber, WTCPUA, 12117 Bee Cave Road, Building 3, Suite 130, Bee Cave, TX 78738

**Mr. Robert P. Callegari, P.E.**  
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**August 15, 2016**

**bcc: TCEQ Central Records PWS File 1050187 (Blue Blazes)**  
**TCEQ Central Records PWS File 2270235**  
**TCEQ Region No. 11 Office - Austin**  
**TCEQ PWSINV, MC-155**  
**TCEQ Leila Terada MC-159**

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



PWS\_2270235\_CO\_2015129\_CorrosionRept

**Texas Commission on Environmental Quality**  
*Protecting Texas by Reducing and Preventing Pollution*

December 9, 2015

Mr. Scott Wetzel, P.E.  
The Wallace Group, Inc., A CP & Y Company  
1 Chisolm Trail, Suite 130  
Round Rock, Texas 78681

Re: West Travis County Regional Water System – PWS ID No. 2270235  
Corrosion Control Study (CCS)  
Travis County, Texas

RN 102646585 | CN 604021980

Dear Mr. Wetzel:

We are responding to your corrosion control study submittal dated July 30, 2015, for the West Travis County Regional WS public water system (PWS) officially notifying the Texas Commission on Environmental Quality (TCEQ) of your corrosion control analysis in accordance with Title 30 of the Texas Administrative Code (30 TAC) §290.42(n) and 30 TAC §290.117(f). Your submittal was received by the Public Drinking Water Section on July 31, 2015. The TCEQ's Technical Review and Oversight Team (TROT) in the Water Supply Division has been charged with the review of corrosion control studies. Corrosion control treatment is considered innovative/alternative treatment under 30 TAC §290.38(36) and must be approved on a case-by-case basis in accordance with 30 TAC §290.42(g). Also, 30 TAC §290.39(j) requires prior TCEQ approval of any long-term change in water treatment impacting water corrosivity.

In accordance with 30 TAC §290.117(b), the action level (AL) for lead is 0.015 milligrams per liter (mg/L) and the AL for copper is 1.3 mg/L. The lead AL is exceeded if the 90<sup>th</sup> percentile lead level exceeds 0.015 mg/L in any monitoring period, and the copper AL is exceeded if the 90<sup>th</sup> percentile copper level exceeds 1.3 mg/L during any monitoring period. Sample results received for the calendar year 2013 compliance period from West Travis County Regional WS exceeded the AL for lead and copper. Sample results received for the calendar year 2014 compliance period from the West Travis County Regional WS exceeded the AL for copper. West Travis County Regional WS is currently on a 6-month sampling schedule for lead and copper tap water monitoring. Based on West Travis County Regional WS' current sampling results, the PWS has exceeded the copper AL for drinking water since August 2013.

The West Travis County Regional WS corrosion control study indicates the planned use of inhibitor passivation with either a phosphate or silica-based inhibitor for corrosion control treatment. The submitted corrosion control study indicates that entry point pH levels ranged from 7.6 to 7.9 and corresponding alkalinities ranged from 134 to 155 mg/L.



Based on review of the corrosion control study provided, the TCEQ is **granting the use** of a phosphate inhibitor (not silica-based inhibitor) for corrosion control with the following conditions:

1. In accordance with 30 TAC §290.117(b), the copper content in the drinking water shall be at or below the copper AL of 1.3 mg/L, unless otherwise approved for a reduced value of at or below 0.65 mg/L. The rules under 30 TAC §290.117(b) state that the lead content in the drinking water shall be at or below the lead AL of 0.015 mg/L, unless otherwise approved for a reduced value of at or below 0.005 mg/L.

Since approval of use of a phosphate inhibitor is intended to ensure compliance of the facility, the West Travis County Regional WS must monitor their chemical feed and storage equipment to ensure successful corrosion control and to ensure compliance with the copper and lead ALs.

2. All chemicals used in treatment of water supplied by public water systems must conform to NSF International (ANSI/NSF) Standard 60 for direct additives. Under no circumstance should the dosing of the phosphate inhibitor exceed the NSF-published maximum concentration level.
3. The chemical storage and feed facilities must comply with TCEQ requirements specified in 30 TAC §290.42(f)(1) and (2), regardless of the water source. These requirements include adequate chemical bulk storage, bulk storage spill containment, proper chemical storage labeling, chemical transfer/control systems spill containment, and chemical feed and metering design. The chemical feed system must be adequate to ensure that overfeeding of the corrosion control chemical does not occur.
4. The PWS must maintain accurate analytical equipment, and the calibration records of this equipment, for monitoring the corrosion control chemical as required in 30 TAC §290.46(s).
5. The PWS must maintain adequate safety equipment for the operators as required in 30 TAC §290.42(k)(1).
6. To evaluate the performance of the corrosion control system, the PWS is required by 30 TAC §290.42(b)(4) and §290.42(d)(15)(C)(vii) to monitor and record the daily quantity of chemicals used [30 TAC 46(f)(3)(A)(i)].
7. The PWS shall maintain records of the quantity of chemicals used for a period of five years and these records shall be made available upon request to the TCEQ as required in 30 TAC §290.46(f)(3)(G).

Corrosion control studies should be submitted within the timeframe described within 30 TAC §290.117(f)(1)(A)(ii) for systems serving populations fewer than 50,000, which states that a study must be conducted within 12 months after the end of the monitoring period in which the system exceeded the lead or copper AL. The West Travis County Regional WS' original AL lead and copper exceedance occurred August 2013 of which the monitoring period ended December 2013, and the corrosion control study was received by TCEQ in July 2015. It is noted that West Travis County Regional WS met with TCEQ in January 2015 to discuss corrosion control requirements and alternatives.

Mr. Scott Wetzel, P.E.  
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December 9, 2015

Your corrosion control submittal states that the West Travis County Regional WS recently modified the chlorine residual leaving the plant and installed two chloramine booster stations in the far reaches of distribution. The TCEQ did not receive plans and specifications for those projects per 30 TAC §290.39(j). Please submit as-built plans and specifications for the project to the TCEQ's Plan Review Team (PRT) at the following address:

Plan Review Team (PRT)  
Water Supply Division MC -159  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

After installing source water lead or copper treatment, the PWS must certify in writing that the PWS has completed installation within 24 months after the date of this approval letter, per 30 TAC §290.117(i)(8). Also, after installation the PWS must conduct entry point lead and copper sampling during two consecutive six-month periods within 36 months after treatment begins in accordance with 30 TAC §290.117(d)(2)(C).

Please update your system's monitoring plan to reflect the additional disinfectant monitoring and mail to the TCEQ Monitoring Plan Coordinator at the following address:

Monitoring Plan Coordinator (MC 155)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711

Additional information is available in TCEQ's Regulatory Guidance No. 384 (RG-384), **HOW TO DEVELOP A MONITORING PLAN FOR A PUBLIC WATER SYSTEM**, or on our website at:

[www.tceq.texas.gov/permitting/water\\_supply/pdw/monitoring\\_plans/monitoring\\_plans.html](http://www.tceq.texas.gov/permitting/water_supply/pdw/monitoring_plans/monitoring_plans.html)

All public water system monitoring plans are required to be kept up-to-date and on file at the system at all times and must be presented to TCEQ staff upon request.

All approvals are subject to periodic review and may be revoked or amended if warranted. Please note that this approval is not intended to waive compliance with any other TCEQ requirement in 30 TAC Chapter 290. This approval cannot be used as a defense in any enforcement action resulting from noncompliance with any requirement of 30 TAC Chapter 290, including the lead or copper action level.

This letter does not address compliance with the public education, action level compliance, scheduling, or sampling requirements for your system. Questions regarding compliance with any of those items should be forwarded to the TCEQ's Public Drinking Water Section. You can contact the Public Drinking Water Section by telephone at (512) 239-4691 or by correspondence at the following address:

Public Drinking Water Section (MC 155)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Mr. Scott Wetzel, P.E.

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December 9, 2015

If you have questions concerning this letter, or if we can be of additional assistance, please contact Jennifer K. Dorsey, P.E. by e-mail at [jennifer.dorsey@tceq.texas.gov](mailto:jennifer.dorsey@tceq.texas.gov), or by telephone at (512) 239-4635, or by correspondence at the following address:

Technical Review & Oversight Team (MC 159)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Sincerely,



Joel Klumpp, Manager  
Plan and Technical Review Section  
Water Supply Division  
Texas Commission on Environmental Quality

JPK/jkd

cc: Don Rauschuber, P.E., WTCPUA General Manager, WTCPUA - West Travis County  
Regional WS, 12117 Bee Cave Road, Bldg. 3, Suite 130, Bee Cave, TX 78738