



Control Number: 44950



Item Number: 24

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A DYNAMIC PERSPECTIVE

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140 East Tyler Street, Suite 600
Longview, TX 75601
903.236.7700

August 1, 2016

Central Records
Public Utility Commission of Texas
1701 N. Congress Ave.
Austin, TX 78701

via email and UPS delivery

Re: **City of Mount Pleasant**
CCN Amendment Application, Docket No. 44950
TCEQ Violation Resolution

To Whom It May Concern:


Transmitted herein is a draft letter from the Texas Commission on Environmental Quality (TCEQ) indicating that all the City of Mount Pleasant's violations (Track No. 561710, Track No. 561723, Track No. 561724) have been resolved.

TCEQ indicated a final letter should be issued soon. Conversations with Public Utility Commission staff indicated that submission of the draft letter is sufficient since the TCEQ database shows that all the violations have been resolved at this time. Enclosed are the original and nine (9) copies of the TCEQ draft letter.

If you have any questions or require additional information, please advise.

Sincerely,

KSA



Jeremy Orr, EIT
Senior Design Engineer

JO/af

Enclosures

pc: Mike Ahrens, CPM, City of Mount Pleasant

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PWS/2250001/CO/05-31-2016/FI

**Texas Commission on Environmental Quality
Investigation Report**

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

**Customer: City of Mount Pleasant
Customer Number: CN600130926**

Regulated Entity Name: CITY OF MOUNT PLEASANT

Regulated Entity Number: RN103728853

Investigation # 1349346

Incident Numbers

Investigator: KEVIN GLANTON

Site Classification SW >10K CONNECTION

Conducted: 05/31/2016 -- 05/31/2016

No Industry Code Assigned

Program(s): PUBLIC WATER SYSTEM/SUPPLY

Investigation Type: Compliance Investigation

Location: LOCATED ON N SIDE OF IH 30 ON LAKEWOOD
DR IN TITUS CO

Additional ID(s): 2250001

Address: ,
, ,

Local Unit: REGION 05 - TYLER

Activity Type(s): PWSFI - PWS FI- Follow-up investigation
for PWS system

Principal(s):

Role	Name
RESPONDENT	CITY OF MOUNT PLEASANT

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	MAYOR	HON PAULO MERIWETHER	Work (903) 575-4000
PARTICIPATED IN	CHIEF OPERATOR	MR SHANE TOWNSON	Work (903) 575-4132

Other Staff Member(s):

Role	Name
QA Reviewer	CARA FISHER
Supervisor	CARA FISHER

Associated Check List

<u>Checklist Name</u>
PWS GENERIC VIOLATIONS

<u>Unit Name</u>
GV

Investigation Comments:

INTRODUCTION

TCEQ Tyler Region Investigator, Mr. Kevin Glanton, conducted a follow-up investigation at the City of Mount Pleasant (PWS ID No. 2250001, CCN No. 10509). Mr. Glanton met with Mr. Shane Townson, Chief Operator.

The investigation was conducted on 05/31/2016. The system was notified of the follow-up investigation on 05/24/2016.

GENERAL FACILITY AND PROCESS INFORMATION

The City of Mount Pleasant water system consists generally of a raw water pump station, a new pre-sedimentation basin with transfer pumps, two surface water treatment plants (SWTP), and a distribution system. More details about the system can be obtained from the most recent Comprehensive Compliance Investigation Report (No. 1227630).

BACKGROUND

At the time of the follow-up investigation, the following violations were active: Track No. 561710, failure to have an appropriate backflow prevention device on the potable water make-up line that serves the LBS Plant; Track No. 561723, a leaking raw water pump; and Track No. 561724, cracks in the walls of the filters at the LBS Plant in which it appeared that water was seeping through the concrete.

ADDITIONAL INFORMATION

During the follow-up investigation, each of the active violations was noted as resolved. Responsible Official: The Honorable Paul O. Meriwether, Mayor, 903-575-4000, 501 N Madison, Mount Pleasant, TX 75455.

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track Number: 561710

Resolution Status Date: 7/19/2016

Violation Start Date: 12/29/2014

Violation End Date: 5/31/2016

30 TAC Chapter 290.42(d)(2)(C)

Alleged Violation:

Investigation: 1227630

Comment Date: 02/16/2015

Failure to provide an air gap or other acceptable backflow prevention device for make-up water supply lines to chemical feeder solution mixing chambers.

During the investigation conducted between 12/15/2014 and 12/29/2014, the investigator observed that the water system only provided a double check valve for the make-up water supply line for the chlorine solution that results from the feeding of chlorine gas into the make-up water. The regulation states that this supply must be protected from either an air gap or other acceptable backflow prevention device. Since the potable water is supplied from the distribution system, the distribution system could be at risk due to the cross-connection with the chlorine solution (if overfeeding could possibly occur) and from the cross-connection where the chlorine solution is injected prior to the filters into the settled water line between the clarifiers and the filters (which results in a cross-connection with pre- and post-filtered water). A cross-connection between unfiltered water and finished water is clearly a health risk, which requires a backflow prevention device that is acceptable for mitigating such health risks. The two options are either an air gap or a reduced pressure principal backflow prevention assembly (RPBA), which is tested upon installation and annually thereafter.

Furthermore, even if there were an RPBA that serves the whole plant, there would be a cross-connection between the chlorine solution line, which ties into the settled water line, and potable water serving the lab, restrooms, and water fountains, etc. It appears that an RPBA is needed for this cross-connection, as well. (Such RPBA on the supply side of the chemical injection point may provide protection for the lab, restrooms, water fountains, etc., and distribution).

Investigation: 1349346

Comment Date: 07/19/2016

Please see violation comments.

Resolution: An RPBA was installed for the make-up water supply lines to the chemical feeders.

Track Number: 561723

Resolution Status Date: 7/19/2016

Violation Start Date: 12/29/2014

Violation End Date: 5/31/2016

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 1227630

Comment Date: 02/16/2015

Failure to maintain the raw water pumps in a watertight condition.

During the investigation conducted between 12/15/2014 and 12/29/2014, the investigator observed that the system failed to repair the leaking raw water pump.

Investigation: 1349346

Comment Date: 07/19/2016

Please see violation comments.

Resolution: During the follow-up investigation, the raw pump was no longer leaking.

Track Number: 561724

Resolution Status Date: 7/19/2016

Violation Start Date: 12/29/2014

Violation End Date: 5/31/2016

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 1227630

Comment Date: 02/16/2015

Failure to maintain in a watertight condition all water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances.

During the investigation conducted between 12/15/2014 and 12/29/2014, the investigator observed that the water system failed to maintain the walls of some of the filters. Some of the filter walls in the filter pipe gallery were leaking. (An engineer should certify that no pre-filtered water could bypass the filter media during the current state of the filters.)

Investigation: 1349346

Comment Date: 07/19/2016

Please see violation comments.

Resolution: During the follow-up investigation, correspondence from the city's contract engineer, Mr. John Ringler PE, with KSA Engineers, was reviewed. Mr. Ringler certified that no pre-filtered water could bypass the filter media and enter the underdrain. Based on this certification, this violation is being resolved. However, the investigator observed that some water may still be seeping through the filter walls. TCEQ will continue to evaluate the condition of the walls during subsequent investigations.

Signed

Date _____

Environmental Investigator

Signed

Date _____

Supervisor

Attachments: (in order of final report submittal)

____ Enforcement Action Request (EAR)

____ Maps, Plans, Sketches

____ Letter to Facility (specify type) : _____

____ Photographs

Investigation Report

____ Correspondence from the facility

____ Sample Analysis Results

____ Other (specify) : _____

____ Manifests

____ Notice of Registration

Investigation Quality Assurance Appendix

Investigation Number: 1349346 Regulated Entity Number: RN103728853 County: TITUS

Regulated Entity Name: CITY OF MOUNT PLEASANT

Physical Address: LOCATED ON N SIDE OF IH 30 ON LAKEWOOD DR IN TITUS CO

Conducted: 05/31/2016 00:00 To 05/31/2016 00:00

Notification Date: 05/24/2016

No Associated Incidents

Staff Tasks

LEAD INVESTIGATOR KEVIN GLANTON

Tasks: 1 hrs. INVEST
4 hrs. POSTINVEST
1 hrs. PREINVEST
3.5 hrs. TRAVEL

QA REVIEWER CARA FISHER

Tasks: 3 hrs. QA

Documents Received

<u>Submitted By</u>	<u>Document Type</u>	<u>Received Dt</u>	<u>Activity Dt</u>	<u>Document Dt</u>
Mr. Shane Townsend	CORRESPONDENCE FROM REGULATED ENTITY	03/30/2015		Document date is 03/27/2015

Communication History

FINALLETTE	07/29/2016
PHOEMALFAX	05/24/2016

<u>Fiscal Year</u>	<u>WP Local Unit</u>	<u>Activity Type</u>	<u>Event Quantity</u>
2016	REGION 05 - TYLER	PWSFI - PWS FI- Follow-up investigation for PWS system	1

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ASSOCIATED TO A NOTICE OF VIOLATION

Checklist: NO ASSOCIATED CHECKLIST

Checklist Item:

Allegation: Failure to provide an air gap or other acceptable backflow prevention device for make-up water supply lines to chemical feeder solution mixing chambers.

Violation Comment:

Citations: 30 TAC Chapter 290.42(d)(2)(C)

Principal: CITY OF MOUNT PLEASANT

Program: PUBLIC WATER SYSTEM/SUPPLY

Track Number: 561710

Classification: MODERATE

Self Reported: YES

Status Code & Date: RESOLVED,05/31/2016

Immunity Granted: NO

Compliance Plan Requested: NO

Repeat Violation: NO

Category and Sub Category Code: B,

EPA Class: N/A

Violation Start Date: 12/29/2014

Refer to Investigation: YES

Violation End Date: 05/31/2016

Compliance Due Date: Not Entered

Violation Comment:

Citations: 30 TAC Chapter 290.46(m)(4)

Principal: CITY OF MOUNT PLEASANT

Program: PUBLIC WATER SYSTEM/SUPPLY

Track Number: 561723

Classification: MODERATE

Self Reported: NO

Status Code & Date: RESOLVED,05/31/2016

Immunity Granted: NO

Compliance Plan Requested: NO

Repeat Violation: NO

Category and Sub Category Code: B,

EPA Class: N/A

Violation Start Date: 12/29/2014

Refer to Investigation: YES

Violation End Date: 05/31/2016

Compliance Due Date: Not Entered

Violation Comment:

Citations: 30 TAC Chapter 290.46(m)(4)

Principal: CITY OF MOUNT PLEASANT

Program: PUBLIC WATER SYSTEM/SUPPLY

Track Number: 561724

Classification: MODERATE

Self Reported: NO

Status Code & Date: RESOLVED,05/31/2016

Immunity Granted: NO

Compliance Plan Requested: NO

Repeat Violation: NO

Category and Sub Category Code: B,

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EPA Class: N/A

Violation Start Date: 12/29/2014

Violation End Date: 05/31/2016

Refer to Investigation: YES

Compliance Due Date: Not Entered