



Control Number: 46806



Item Number: 9

Addendum StartPage: 0

DOCKET NO. 46806

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CITY OF BRIDGE CITY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

PUBLIC UTILITY COMMISSION
FILING CLERK

- Staff 1-1** Please provide a copy of the most recent Texas Commission on Environmental Quality (TCEQ) Comprehensive Compliance Investigation (CCI) report for Bridge City.
- Staff 1-2** Please describe how Bridge City's TTHM violations are being addressed.
- Staff 1-3** Please review the following violations and provide documentation showing the violations have been resolved or that Bridge City is working towards resolution. Bridge City may contact the TCEQ at 512-239-4691 to discuss how these violations can be resolved.

NOV Date	Citation/Requirement Provision	Allegation
10/26/2016	30 TAC Chapter 290, SubChapter F 290.121(b)(1) (Not applicable to CH)	Failure by the City of Bridge City to have a complete monitoring plan.
10/26/2016	30 TAC Chapter 290, SubChapter D 290.46(m) (Not applicable to CH)	Failure by the City of Bridge City to maintain good working condition and general appearance of the systems facilities and equipment.
10/26/2016	30 TAC Chapter 290, SubChapter D 290.46(m) (Not applicable to CH)	Failure by the City of Bridge City to maintain the liquid level indicator on the ground storage tank.
10/26/2016	30 TAC Chapter 290, SubChapter D 290.46(m) (Not applicable to CH)	Failure by the City of Bridge City to maintain the fence at the Sunnyside 0.500 MG elevated storage tank free of excessive vegetation.
10/26/2016	30 TAC Chapter 290, SubChapter F 290.121(a) (Not applicable to CH)	Failure by the City of Bridge City to maintain a copy of the monitoring plan at each plant.
10/26/2016	30 TAC Chapter 290, SubChapter D 290.42(l) (Not applicable to CH)	Failure by the City of Bridge City to have an adequate plant operations and maintenance manual.

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



Received

NOV 01 2016

City Secretary Office

A handwritten signature in black ink, appearing to be "JH".

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 26, 2016

**CERTIFIED MAIL {7015 0640 0004 7999 4698}
RETURN RECEIPT REQUESTED**

The Honorable David Rutledge
Mayor, City of Bridge City
PO Box 846
Bridge City, Texas 77611

**Re: Notice of Violation for Public Water Supply Comprehensive Compliance Investigation at:
City of Bridge City, Bridge City (Orange County), Texas; PWS ID No.: 1810001; Investigation
No.: 1368556**

Dear Mayor Rutledge:

On September 14, 2016, Ms. Claire Carlton and Ms. Paige Pritchard of the Texas Commission on Environmental Quality (TCEQ) Beaumont Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public water supply. During the investigation, some concerns were noted which were alleged noncompliance's that have been resolved as Areas of Concern based on subsequent corrective action. In addition, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **February 23, 2017**, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for the outstanding alleged violation.

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 Beaumont Region Office at (409)-898-3838 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 Beaumont Region Office within 10 days from the date of this letter. At that time, Ronald Hebert, Water Section Manager, will schedule a violation review meeting to be conducted within 21 days from the date of this letter.

The Honorable David Rutledge

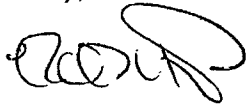
October 26, 2016

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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 enclosed 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. Carlton in the Beaumont Region Office at (409) 898-3838.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ronald Hebert', with a stylized flourish at the end.

Ronald Hebert
Water Section Manager
Beaumont Region Office

RH/CC/cal

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

CITY OF BRIDGE CITY

260 RACHAL AVE

BRIDGE CITY, ORANGE COUNTY, TX 77611

Investigation #

1368556

Investigation Date: 09/14/2016

Additional ID(s): 1810001

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 620835 Compliance Due Date: 02/23/2017

30 TAC Chapter 290.42(l)

Alleged Violation:

Investigation: 1368556

Comment Date: 10/25/2016

Failure by the City of Bridge City to have an adequate plant operations and maintenance manual.

During the investigation, it was noted that the water system does not maintain sufficient detail to provide the operators with routine maintenance and repair procedures in the plant operations and maintenance manual. The system should note any routine maintenance and repairs that take place at the plants. The operations and maintenance manual only discussed required sampling, emergency contacts, and protocols for an event.

Recommended Corrective Action: Update the Plant Operations Manual to include sufficient detail to provide the operators with routine maintenance and repair procedures for each plant. Submit a copy to the Beaumont Regional Office.

Track No: 620837 Compliance Due Date: 02/23/2017

30 TAC Chapter 290.121(a)

Alleged Violation:

Investigation: 1368556

Comment Date: 10/25/2016

Failure by the City of Bridge City to maintain a copy of the monitoring plan at each plant.

During the investigation, it was noted that the water system is not maintaining the monitoring plan at each plant site.

Recommended Corrective Action: Place a copy of the monitoring plan at each plant. Submit photographic documentation to the Beaumont Regional office.

Track No: 620838 Compliance Due Date: 02/23/2017

30 TAC Chapter 290.46(m)

Alleged Violation:

Investigation: 1368556

Comment Date: 10/13/2016

Failure by the City of Bridge City to maintain the fence at the Sunnyside 0.500 MG elevated storage tank free of excessive vegetation.

During the investigation, it was noted that the fence at the Sunnyside 0.500 MG elevated storage tank had vegetation on the back section.

Recommended Corrective Action: Remove the excessive vegetation from the fence and submit photographic documentation to the Beaumont Regional Office.

Track No: 620840 Compliance Due Date: 02/23/2017

30 TAC Chapter 290.46(m)

Regional Office.

Resolution: During the investigation, it was noted that the RPZ located at the Raceway gas station and Dr. Messers Dentist Office were tested in 2015.

Track No: 620843

30 TAC Chapter 290.41(c)(3)(K)

Alleged Violation:

Investigation: 1368556

Comment Date: 10/24/2016

Failure by the City of Bridge City to maintain the 16-mesh vent screen for well no. 3.

During the investigation, it was noted that the vent screen on well no. 3 was no longer sealed with a 16-mesh or finer corrosion resistant screen.

Recommended Corrective Action: Cover the well vent with an adequate 16-mesh screening material. Submit photographic documentation to the Beaumont Regional Office.

Resolution: During the investigation, the water system installed a 16-mesh or finer corrosion resistant screen on the well vent.

ADDITIONAL ISSUES**Description****Additional Comments**

Item 9

During the investigation, it was noted that there are minor rust spots on the outside of the Sunnyside 0.500 GM elevated tank. These were also noted on the system tank inspection forms.

Item 11

During the investigation, it was noted that the ground storage tanks inlet pipe terminates just above halfway in the tank at plant no. 2. Please note that it is a best practice to maintain inlet pipes at the top of ground storage tanks to prevent short circuiting of water within the tank.

Item 12

During the investigation, it was noted that the contract to sell water to the Community Water System, Cherry Hills Subdivision (PWS ID No. 1810018) only states the minimum purchase rate of 80 gpm. The purchaser contract is required to state the maximum purchase rate.

Item 13

The following additional sampling was conducted during the investigation: Calcium (Ca), Sodium (Na), Alkalinity, Chloride, Total Dissolved Solids (TDS), Sulfate, pH, and Temperature. Sampling was conducted at all three entry points for the system in addition to a complainant's residence. All of the sample results were forwarded to the Water Supply Division for evaluation. It was determined that based on the sample results, the water entering the distribution may be potentially corrosive. It is suggested that the water system take precautionary measures, including but not limited to, performing a corrosion control study to ensure subsequent issues do not arise as a result of corrosion. The Public Drinking Water Section in Austin has been made aware of the potentially corrosive nature of the water for further tracking and monitoring. Please be aware that pH and corrosivity are secondary constituents and do not pose a direct health threat to the consumer.



Texas Department of State Health Services

PO BOX 149347
AUSTIN, TEXAS 78714-9347
1-888-963-7111
www.dshs.state.tx.us

LABORATORY SERVICES SECTION, MC-1947
1100 W. 49th St., Austin, Tx. 78756 (512)458-7587

Trihalomethanes by GC/MS Analysis Report

Submitter Identification Number: 1810001

CITY OF BRIDGE CITY
RUTLEDGE, DAVID, E
PO BOX 846
BRIDGE CITY, TX 77611-0846

Date Reported : 12/13/2016
Report ID# : 20161213094430AD59024

Lab Sample ID# : AD59024
Sample Priority : NORMAL
TCEQ ID#(s) : 1656894

Water Source :
Entry Point(s) : DBP2-01

Date Collected : 11/22/2016 10:29
Date Received : 11/23/2016
Date Analyzed : 11/28/2016

Conc. Units : µg/L
Method : EPA 524.2
Analyst : DM
Sample Cond. : Acceptable

Trihalomethanes	Result	Qualifier
Chloroform	2.3	
Bromodichloromethane	5.3	
Dibromochloromethane	13.2	
Bromoform	39.0	
Total Trihalomethanes ¹	59.8	

Comments:

The test results on this report relate only to the sample identified on this report. The test results for analytes noted(') meet all TNI (2009 Standard) requirements.

Authorized by Chemist III AVINYARD on 12/08/2016

Received
DEC 28 2016
City Secretary Office

**TEXAS**Department of
State Health Services**Texas Department of State Health Services**

LABORATORY SERVICES SECTION, MC-1947

1100 W. 49th St., Austin, Tx. 78756 (512)458-7587

PO BOX 149347
AUSTIN, TEXAS 78714-9347
1-888-963-7111
www.dshs.state.tx.us**Trihalomethanes by GC/MS
Analysis Report**

Submitter Identification Number: 1810001

CITY OF BRIDGE CITY
RUTLEDGE, DAVID, E
PO BOX 846
BRIDGE CITY, TX 77611-0846

Date Reported : 12/13/2016

Report ID# : 20161213094430AD59027

Lab Sample ID# : AD59027
Sample Priority : NORMAL
TCEQ ID#(s) : 1656895Water Source :
Entry Point(s) : DBP2-02Date Collected : 11/22/2016 10:45
Date Received : 11/23/2016
Date Analyzed : 11/28/2016Conc. Units : µg/L
Method : EPA 524.2
Analyst : DM
Sample Cond. : Acceptable

Trihalomethanes	Result	Qualifier
Chloroform	2.3	
Bromodichloromethane	5.5	
Dibromochloromethane	17.0	
Bromoform	43.8	
Total Trihalomethanes ¹	68.6	

Comments:

The test results on this report relate only to the sample identified on this report. The test results for analytes noted(') meet all TNI (2009 Standard) requirements.

Authorized by Chemist III AVINYARD on 12/08/2016

THM Violations

We have currently taken well #3 out of service. The well casing was in bad shape and was allowing water in from surface area and shallow waters. Weisinger Incorporated is installing a liner 450' and replacing concrete and well block to eliminate in surface water intrusion. The well will be cleaned and tested before it is put back into service. I have added the last THM results from lab and they are well within the limits.

Monitoring Plan for the City of Bridge City

Date of Monitoring Plan: September 12, 2016

PWSID: 1810001 Orange County, Texas

Responsible Official: Jerry Jones, City Manager

Water Supply Contact: Mike Lund, Superintendent, 409-735-6801

The City of Bridge City owns and operates 4 wells, purchases treated groundwater from Orangefield Water Supply, and sells water to Regal Point Addition. The system serves 8651 people, 3596 connections.

A. Raw Water Sampling

The City of Bridge City has 4 wells and is not required by TCEQ to collect any raw water sampling.

B. Entry Point Sampling

1. List of Entry Points

Entry Point	Sample Site	Source	Plant Name
001	Outside Faucet	Gulf Coast	Well #4
002	Outside Faucet	Gulf Coast	Well #3
003	Faucet on tank	Gulf Coast	Well #5
004	Outside Faucet	Gulf Coast	Well #2

2. Disinfectant Entering the Distribution System

The City of Bridge City uses chlorine gas for its disinfection in the distribution system. The chlorine is measured as free chlorine.

- a. Frequency: Although we are not required to do so by the TCEQ, disinfectant residual is measured Monday-Friday.
- b. Location: At each well site.
- c. Method: The Hach colorimeter is used to measure the chlorine at each site.
- d. Compliance calculations: The system is in compliance if the free chlorine entering the distribution system is 0.2 mg/l. We maintain a residual of at least 2.0 mg/l at each entry point.

Organic Chemicals, Inorganic Chemicals, and Radiological Chemicals

Entry Points---001, 002, 003, 004

- 001 Located at 290 Rachal Ave. (closest to CL2 room)
- 002 Located at 290 Rachal Ave. (closest to Nitche)
- 003 Located at 615 Romero
- 004 Located at 2575 FM 408

Samples taken and frequency:

- Nitrate and Nitrite: Every 3 years
- Minerals and Metals: Every 3 years
- Asbestos Fibers: Every 9 years
- Radiochemicals: Taken when asbestos fibers test taken

The following samples are taken by TCEQ through a process called Vulnerability Assessment:

Synthetic Organic Chemicals (SOCs)

Volatile Organic Chemicals (VOCs)

Compliance calculations: If the concentrations of contaminants are less than the regulatory maximum contaminate levels, the system is in compliance. The TCEQ will inform us of any violations.

4. Chlorine Dioxide

The City of Bridge City **does not** use this chemical.

5. Chlorite

The City of Bridge City **does not** use chlorine dioxide, so the requirement **does not** apply to the City of Bridge City.

6. Bromate

The City of Bridge City **does not** use ozone, so the requirement **does not** apply to the City of Bridge City.

7. Other Chemicals

Another additive added to the water is a polyphosphate called NAPCO 214, added at each entry point 001, 002, 003, and 004. NAPCO 214 is a liquid polyphosphate inhibitor designed to be used in potable water systems to minimize the occurrences of "red water". The polyphosphate used in NAPCO 214 is the most stable form of polyphosphate available. Due to the stability, NAPCO 214 is uniquely able to sequester both iron and manganese and prevent discoloration from occurring and then reoccurring again due to time and heat.

Company Information: NAPCO Chemical Company Inc.

PO Box 1239

Spring, TX 77383-1239

Phone: 1-800-929-5976

Fax: 1-281-651-6868

C. Distribution System Sampling

Frequency: The City of Bridge City takes one sample of free chlorine daily.

Location: Address taken and days taken.

A. Monday	313 Bell Ave.
B. Tuesday	5010 Stately Dr.
C. Wednesday	135 Blueberry
D. Thursday	405 Nevils
E. Friday	195 Ridgewood
F. Saturday	105 Parkside
G. Sunday	2865 Texas Ave.

Method: The City of Bridge City uses the Hach Colorimeter to measure the free chlorine.

Compliance Calculations: As long as the free residual is above a 0.2 mg/l and below a 4.0 mg/l the system is in compliance.

D. Bacteriological Samples

Frequency: The City of Bridge City collects the samples once per month.

Location: The bacteriological samples are taken from residents house faucet.

Location address of samples taken:

H. 385 Lake St

I. 135 Blueberry

J. 405 Nevils

K. 200 Bower Dr.

L. 195 Sewer Plant Rd.

M. 2865 Texas Ave.

N. 150 W. Roundbunch Rd.

O. 105 Parkside

P. 313 Bell Ave.

Q. 195 Ridgewood

R. 5010 Stately Dr.

Method: Samples are sent to a certified lab (Sabine River Authority)

Laboratory Information: Sabine River Authority

An Agency of the State of Texas

Environmental Services Division

Water Quality Laboratory

1895 Owens-Illinois Road

Orange TX 77632

Phone: 409-746-3284

Fax: 409-746-2249

Compliance Calculations: As long as samples come back absent of E. Coli and/or Total Coliform the system is in compliance. If a sample is found present of E. Coli and/or Total Coliform then repeat samples must be taken. Take one sample

within five upstream, take one sample within five downstream, take one at original sample site, and take a raw sample at each active well for this month. If sample comes back absent of E. Coli and/or Total Coliform the system is in compliance. If a sample is found present of E. Coli and/or Total Coliform then call local TCEQ (409-898-3838) and issue a boil water notice.

E. Lead and Copper Rule

Frequency: The City of Bridge City collects twenty samples once every three years.

Location: Address of samples taken:

1. 206 Meadowcrest
2. 324 Farm
3. 108 Robin
4. 204 Live Oak
5. 179 Live Oak
6. 107 Woodsong
7. 1306 Arthur Dr.
8. 980 Highland
9. 425 Lake
10. 204 Meadowcrest
11. 170 Shadowdale
12. 1000 Rebecca
13. 555 Osborne
14. 420 David
15. 104 Woodsong

16. 111 Woodsong

17. 260 Roberts

18. 105 Skylark

19. 102 Robin

20. 106 Robin

Method: Samples are taken to Sabine River Authority.

Compliance Calculations: The city is in compliance if the result is less than the maximum contaminant level. The TCEQ will notify us of any violations.

E. Disinfection Byproducts (DBPs)---TTHM and HAA5

Frequency: The TCEQ's sampling contractor collects the samples.

Location:

21. 135 Blueberry

22. 2865 Texas Ave.

23. 195 Ridgewood

24. 880 Norbert

Method: Samples are taken to a certified lab by TCEQ's sampling contractor.

Compliance calculations: The system is in compliance if the running annual average of all samples is less than the maximum contaminant level. The TCEQ will notify us of any violation.

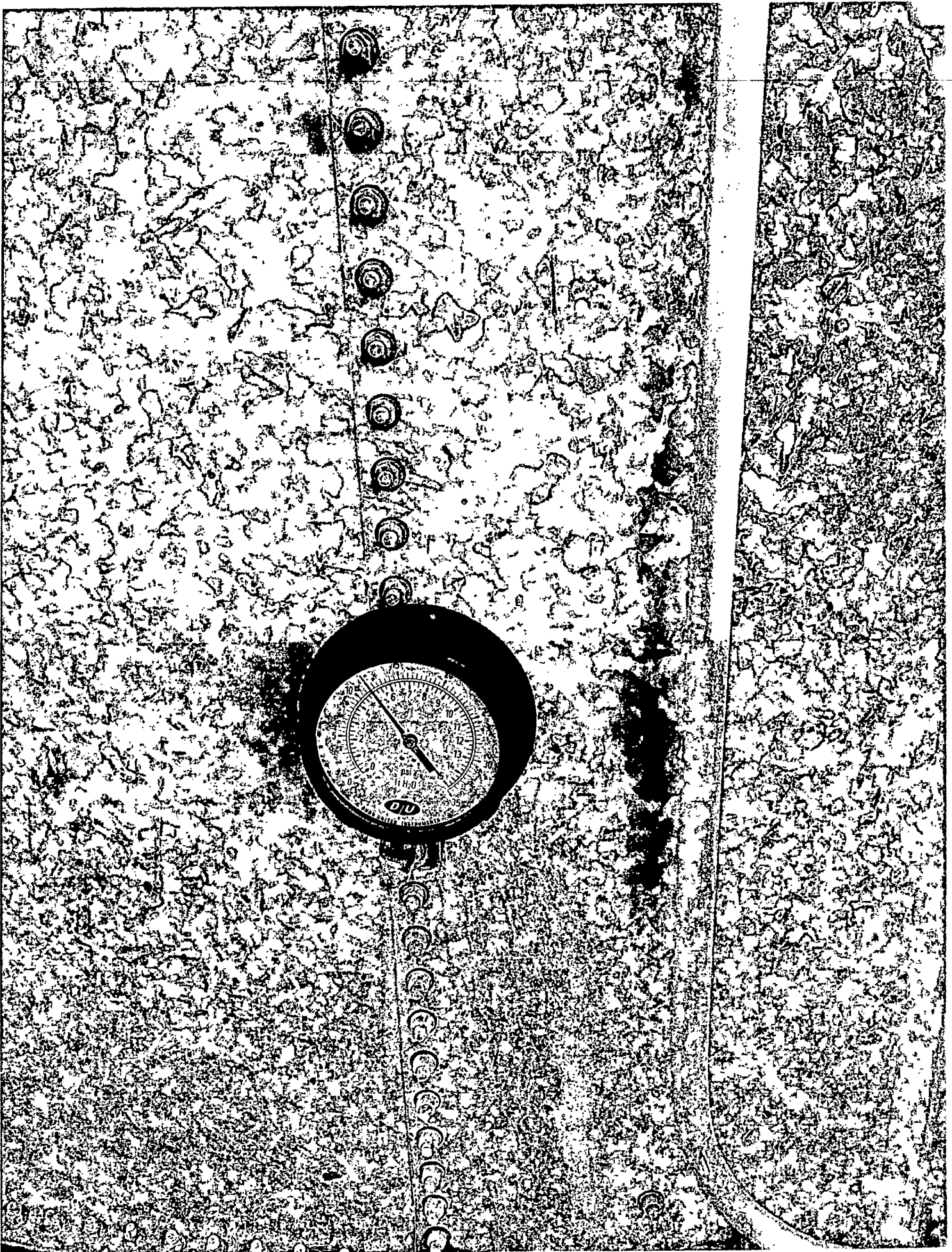
Allegations Not Completed

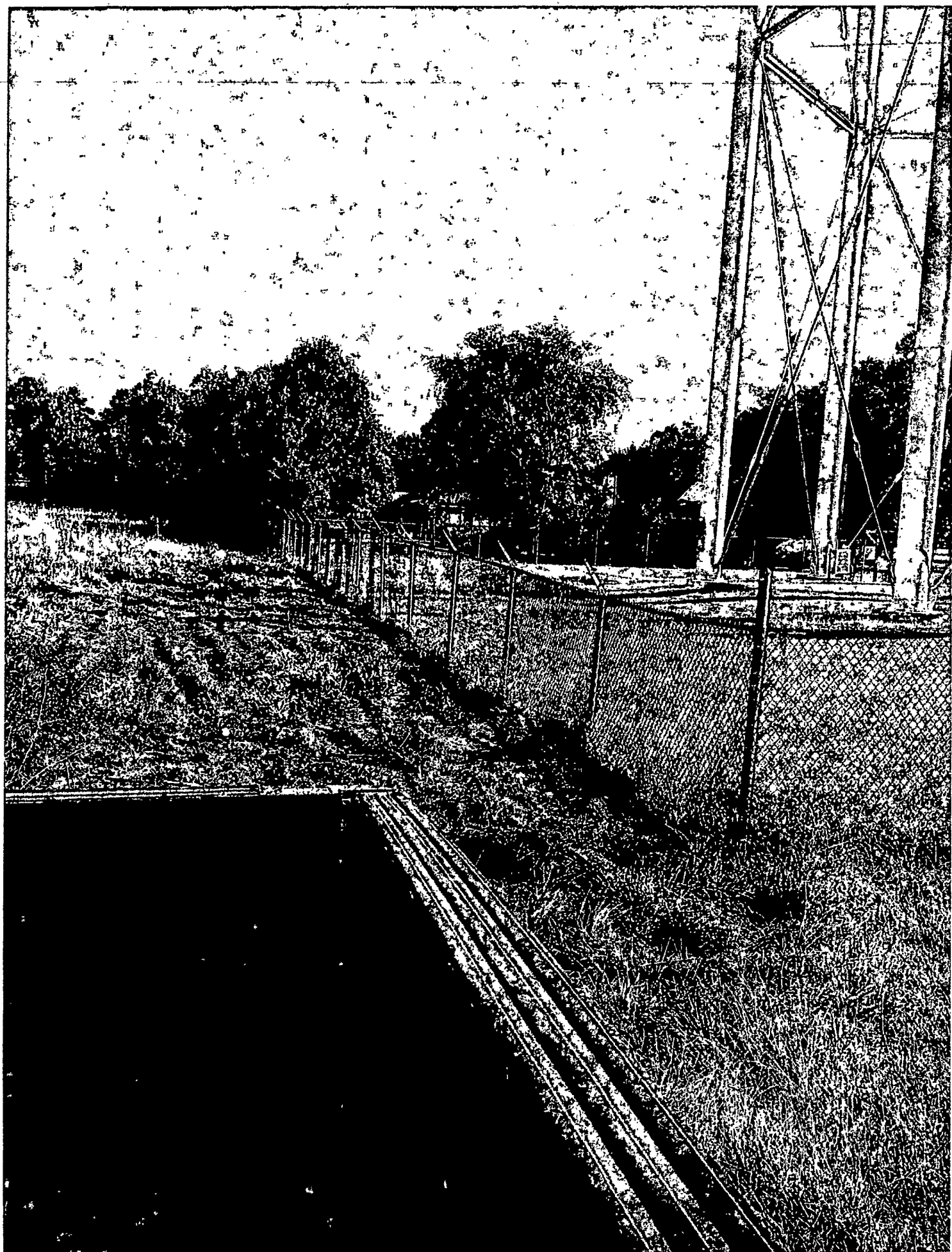
Allegation #2 -Failure by the City of Bridge City to maintain good working condition and general appearance of the system facilities and equipment.

At the time of inspection well #3 was out of service and being worked on by Weisinger Incorporated. The crack in the well sealing block will be repaired before the well is put back into service by Weisinger Incorporated and pictures will be submitted.

Allegation #6- Failure by the City of Bridge City to have an adequate plant operations and maintenance manual.

The City of Bridge City is in the process of adding filters at their well sites and upon completion the plant operation and maintenance manuals will be put together and submitted.





City of Brogo, City

Monitoring Plan Well 2/4

City of Bridge City

Monitoring Plan Well

City of Bridge City

Monitoring Plan Well 5

Allegations Not Completed

Allegation #2 -Failure by the City of Bridge City to maintain good working condition and general appearance of the system facilities and equipment.

At the time of inspection well #3 was out of service and being worked on by Weisinger Incorporated. The crack in the well sealing block will be repaired before the well is put back into service by Weisinger Incorporated and pictures will be submitted.

Allegation #6- Failure by the City of Bridge City to have an adequate plant operations and maintenance manual.

The City of Bridge City is in the process of adding filters at their well sites and upon completion the plant operation and maintenance manuals will be put together and submitted.