

From: [Linda Brookins](#)
To: [Joel Klumpp](#); [James Weddell](#); [Ada Lichaa](#); [Vera Poe](#)
Cc: [Cari-Michel Lacaille](#); [Justin Taack](#); [Emily Young](#)
Subject: FW: City of Wichita Falls / Real Time Crypto/Giardia Testing
Date: Wednesday, August 14, 2013 6:40:26 PM

For your eyes only.

We will need to make an appointment with the ED soon to brief him on the situation per L'Oreal. When do you anticipate we will be ready to brief with our draft letter in hand? I know you need quality time to develop the letter. I do not want to pressure you, because I know you are working as hard as you can. Just an estimate.

From: Isaac Jackson
Sent: Wednesday, August 14, 2013 1:54 PM
To: James Frank (jfrank@sharpirongroup.com)
Subject: City of Wichita Falls / Real Time Crypto/Giardia Testing

Representative Frank,

Thank you for the opportunity to discuss the City of Wichita Falls and the TCEQ's efforts on the project. The latest communication with the City of Wichita Falls we discussed is included. The TCEQ is committed to working with the City to expedite the project while protecting public health and the environment.

Thanks,
Isaac

Isaac Jackson
Intergovernmental Relations
TCEQ
(512) 239-3508

From: Linda Brookins
Sent: Wednesday, August 14, 2013 9:53 AM
To: 'Russell Schreiber'
Cc: Joel Klumpp; Ada Lichaa; James Weddell; Jack Schulze; Vera Poe; Alicia Diehl; Cari-Michel Lacaille; Justin Taack; Emily Young
Subject: RE: Real Time Crypto/Giardia Testing

Russell,

The TCEQ project team has discussed your email comments from 7/29. We have the following responses to your comments:

Your comment: Isolation of the DPR water during the FSV from ground storage facilities and any

structure containing potable water on site will be achieved by removing the 42" 90 degree elbow on the 2010 transfer pump station. This will create the desired air gap and isolate the DPR from all potable water facilities.

Response: This proposal sounds generally acceptable to TCEQ. However, before we can approve the proposal please provide a drawing showing the removal of the 42" 90 degree elbow for my staff to review. We ask that a drawing be submitted to ensure that we fully understand the proposal.

Your comment: In addition to the isolation of the 61 and the 87 plant as described in question set 2, (weir gates closure), the City is prepared to open the drain valves in the parshall flumes of the 87 plant and the drain valves in the 61 plant settling basis. Any water that could unlikely escape the splitter box weir gates would flow directly into the open drain valves and into the Recovery well.

Response: The TCEQ will consider this proposal further after we receive drawings showing the drain valves. Please indicate on the drawings that these drain valves will remain open during the Full-Scale Verification Test. Include the proposed monitoring frequency to verify the weir gates are not leaking, how the absence of leakage will be documented, and how needed corrective actions (in the event of leakage) will be assured to be taken and documented.

Your comment: The [Lake Kemp raw water] line will be isolated by closing the 36" valve at the Flow Control Vault. It is important to note that water in the Lake Kemp raw water line will turn septic in a very short timeframe after it is shut-off; therefore, before it can be brought back on line the entire 15 miles of line will have to be flushed. In the unlikely event that DPR water happened to pass through the valve it will be flushed out prior to the Lake Kemp supply being reinstated.

Response: This proposal could be an acceptable alternative to TCEQ. One of the TCEQ's concerns has been the potential for pathogen growth from seeping WWTP effluent after months of nonuse and this being slugged into the treatment plant after converting back to treating raw surface water. Before we can approve the proposal please provide a standard operating procedure for flushing of the Lake Kemp raw water line. The SOP should include, but not be limited to, procedures for the flow rate during flushing, the target volume to be flushed (i.e. how many pipe volumes to be flushed), what parameter will be monitored to ensure the pipeline has been adequately flushed (e.g. temperature, Sucralose, etc.). Additionally, the TCEQ notes a meter immediately upstream of the shut-off valve. If the TCEQ accepts this alternative, we will require that this meter be read on a periodic basis and the readings recorded during the Full-Scale Verification Test and during the normal operation of the Emergency DPR project to document that no flow is occurring in either direction in the pipeline.

A related topic was discussed during the conference call on 7/25/13. TCEQ staff had questions regarding the air gaps for the water line from the RO membrane facility to the storage lagoon and from the 2010 clearwell's transfer pumps to the manhole. Please note that per the definition of air gap in TCEQ's regulations, an air gap is a physical separation equal to two times the diameter of the outlet pipe above the overflow elevation of the basin. Your proposal does not meet this distance, therefore we will have to consider this as an exception to 30 TAC 290.42(d). We request that a minimum physical separation of nine (9) inches be implemented. Please submit revised drawings

which show a minimum separation distance of nine inches for these two water lines.

Another related topic was discussed during the conference call on 8/1/13. TCEQ staff questioned what the source of backwash water will be for the conventional filters during the Full-Scale Verification Test. City staff indicated that the backwash source water will be from the three existing ground storage tanks at the Cypress plant. However, these tanks will not be isolated from the treatment process during the Full-Scale Verification Test. Please provide the applicable detailed engineering drawings, size and type of valves, and a complete description, including a hydraulic model, of how the City is proposing to backwash the conventional filters during the Full-Scale Verification Test. Include the minimum water level the City is proposing to maintain in the three GSTs and each filter's overflow elevation. Please also describe the procedure that will be used to replenish these tanks.

Your response (received 07/25/13 via email) to our third set of questions included multiple outputs from the TCEQ CT Study template. Please respond to this email and provide an **electronic copy of the Excel CT Study template that you used** to generate these outputs. TCEQ staff needs to make a minor adjustment for the required log inactivations for the Secondary Reservoir's raw surface water.

Your 7/31/2013 response indicated that none of the data that the TCEQ had requested for the "reverse transcription Polymerase Chain Reaction" (rtPCR) onsite monitoring was available. Specifically, the TCEQ requested:

1. Detailed information on the analytical method and quality assurance/quality control methods being used;
2. Test equipment required;
3. Staff training required; and
4. Laboratory accreditation (such as EPA, NELAC, etc.) available for the analytical method.

Your response stated that since the method was not approved by EPA, none of the above data was available and that the City was continuing to evaluate the rtPCR method. Since the City has been using this analytical method and is continuing to evaluate it, the City would have access to the requested information on Item Nos. 1, 2 and 3 above. In addition, the EPA is not the only organization having an accreditation program and Item No. 4 ask for any available accreditation for this analytical method. As noted, it is very important that the City provide this information so that TCEQ staff's review can proceed.

Thank you for all of the information that the City has provided to this point.

If you have questions regarding our responses above or regarding any of the items we have requested in this email, please give me a call or you can call Joel at 512-239-4453.

Sincerely,

Linda Brookins, Director
Water Supply Division

Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087
(512) 239-4625

From: Russell Schreiber [<mailto:russell.schreiber@wichitafallstx.gov>]
Sent: Tuesday, August 13, 2013 8:17 AM
To: Linda Brookins
Subject: Re: Real Time Crypto/Giardia Testing

Linda

Hope the Drinking water conf went well last week.

I'm just checking in to see where we stand with the review and the potential meeting in Austin to work out any issues. The CM is pressing me on this so we are ready when you are.

Please let us know.

Thanks

Russell Schreiber P.E
Director of Public Works
City of Wichita Falls Texas
940 761 7477

On Thu, Aug 1, 2013 at 7:48 AM, Russell Schreiber <russell.schreiber@wichitafallstx.gov> wrote:
Sounds good
Looking forward to our discussion today.

Russell Schreiber P.E
Director of Public Works
City of Wichita Falls Texas
[940 761 7477](tel:9407617477)

On Wed, Jul 31, 2013 at 5:23 PM, Linda Brookins <linda.brookins@tceq.texas.gov> wrote:
Russell,

Thank you for your email with additional information about isolation of the DPR water at the Cypress facilities during the FSV test and normal operation. Your comments are under discussion by the TCEQ project team. We will respond to you via email or during a regularly scheduled conference call; however, at this time we are not ready to discuss this matter tomorrow. Joel will send you an agenda for tomorrow's conference call.

Linda Brookins, Director
Water Supply Division
Texas Commission on Environmental Quality

P.O. Box 13087
Austin, Texas 78711-3087
[\(512\) 239-4625](tel:5122394625)

From: Russell Schreiber [mailto:russell.schreiber@wichitafallstx.gov]
Sent: Wednesday, July 31, 2013 2:17 PM

To: Linda Brookins
Subject: Re: Real Time Crypto/Giardia Testing

Linda

Just checking in with you to make sure you received my last e-mail related to the air-gap issue and was interested in your thoughts.

Also was wondering if you had an agenda for tomorrow's conf call. Any particular issue we needed to discuss.

I know Kerry has our response to Question set 4 and should be getting that down to your team either today or tomorrow.

Thanks

Russell Schreiber P.E
Director of Public Works
City of Wichita Falls Texas
[940 761 7477](tel:9407617477)

On Mon, Jul 29, 2013 at 8:23 AM, Russell Schreiber <russell.schreiber@wichitafallstx.gov> wrote:

Linda

Good talking to you and your team Thursday. I feel like we moved in a positive direction.

During our conf call on 7/18 the TCEQ stated their position for isolation of the DPR water from all facilities at Cypress was to cut the lines and create an air gap in all piping connecting the DPR water to any other facilities at Cypress. The City has responded to this particular topic in Question set #2, on 7/16, however, due to the difficulty of not only removing valves to create an air gap, but re-installation of the valves at a later date, our response to these questions did not include creating an air gap. Therefore we suspect our response will be considered inadequate.

You and I have had additional conversations related to this issue and it was discussed during our most recent conf call on 7/25. To summarize our discussions related to isolation of the DPR water from the remainder of the Cypress facilities during the FSV and normal operations of the DPR the City's position is as follows:

The purpose for the isolation is to protect the health and safety of the public.

A threat to the health and safety of the public only exists if the DPR treatment process fails. Isolation of the DPR water during the FSV from ground storage facilities and any structure containing potable water on site will be achieved by removing the 42" 90 degree elbow on the 2010 transfer pump station. This will create the desired air gap and isolate the DPR from all potable water facilities.

Also all treatment facilities at the Cypress WTP will be off-line during the FSV. During normal operations of the DPR project, the 87 and 61 plants will remain off-line.

In addition to the isolation of the 61 and the 87 plant as described in question set 2, (weir gates closure), the City is prepared to open the drain valves in the parshall flumes of the 87 plant and the drain valves in the 61 plant settling basis. Any water that could unlikely escape the splitter box weir gates would flow directly into the open drain valves and into the Recovery well.

The TCEQ has not formally required the City to create an air gap on the Lake Kemp raw water line, but it was mentioned during the conf call on 7/18. Since this is a raw water line and has no impact on the health and safety of the public water supply, it is planned to remain in place and no air-gap created. The line will be isolated by closing the 36" valve at the Flow Control Vault. It is important to note that water in the Lake Kemp raw water line will turn septic in a very short timeframe after it is shut -off, therefore, before it can be brought back on line the entire 15 miles of line will have to be flushed. In the unlikely event that DPR water happened to pass through the valve it will be flushed out prior to the Lake Kemp supply being reinstated.

We feel these actions will serve to preserve and protect the health and safety of the public drinking water and could be implemented with the very least amount of disruption or modifications to the Cypress WTP. I ask that you and your team please take this e-mail into consideration when evaluating the City's response to Question set # 2.

We will submit a revised plan sheet with these modifications once approved by the TCEQ. Kerry will also follow-up this e-mail with a formal letter response.

Russell Schreiber P.E
Director of Public Works
City of Wichita Falls Texas
[940 761 7477](tel:9407617477)

