



PUBLIC WORKS DEPARTMENT

Joel Klumpp, Team Leader
Technical Review & Oversight Team MC-159
Texas commission on Environmental Quality
P.O. Box 13087
Austin, TX, 78711-3087

July 11, 2014

Re City of Wichita Falls – PWS ID No. 2430001 Temporary Direct Potable Reuse Project

Mr. Klumpp,

This letter is submitted in response to our conference call on July 8, 2014 wherein we discussed the items identified and summarized by the City in our letter dated July 2, 2014 regarding your letter dated June 27, 2014. Based on the outcome of the conference call, it is our understanding that the City and the TCEQ have reached consensus regarding the majority of our letter of July 2, 2014, and that the TCEQ will formally respond to memorialize this understanding. However, it is also our understanding that there are a few items that require further consideration before the TCEQ will formally respond. These items are discussed in more detail herein.

The first item we discussed, but yet required additional consideration, is described in the City's letter as: "Page A-5 of A-18, Table 1." Table 1 lists a number of conditions, which would require notification of the City's Retail, and Wholesale customers (as well as the TCEQ). The conditions, 4a thru 4j are related to monitoring and treatment techniques, which if met, do not constitute a threat to the health and safety of the water user. These items are technical in nature and only understood by trained water treatment professionals. To notify a customer of a failed DIT, for example, would only serve to cause unrest and confusion. It is the City's opinion that customers should only be notified if the water is unsafe to drink, poses a threat to the health and safety of the public, and/or does not meet all drinking water standards.

The City agrees with the notification requirements for items 4k, 4l, and 4m as these are specific to the finished water quality entering the distribution system and are also regulated water quality standards. The City requests that items 4a thru 4j in Table 1, however, require notification of only the TCEQ given that these are process technique and operational issues. Upon review of documentation submitted by the City, the TCEQ can determine if customer notification should be considered, and the City and TCEQ can subsequently meet to confer before any formal notification is required..

CITY OF WICHITA FALLS

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The second item that required additional consideration is described in the City's letter as: "Page A-7 of A-18 Item 13". To memorialize our discussions, your staff requested additional revisions to the Full Scale Operations Monitoring Plan. The modified plan is attached hereto for final approval.

The last item that required additional consideration is related to the requirement to bury the pipeline if the Project is to operate longer than 6 months. To memorialize our discussions, your staff indicated that this is a requirement of the Water Quality Division as part of the design criteria for reclaimed water facilities. That said, we will be submitting additional material to that Division confirming final disposition of the matter via a variance pursuant to 30 TAC 217.4.

Again, the City appreciates the due diligence and attention given the Project and all of the hard work expended by you and your staff. As the TCEQ is aware, the Project began operations on July 9, 2014. As such, the City would like to have all final documentation completed as quickly as possible. If additional information is required, please let us know.

Sincerely:



Russell Schreiber P.E.
Director of Public Works

Cc Daniel Nix Utility Operations Manager
Mark Southard Water Treatment Superintended
Brad Castleberry Lloyd Gosselink

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