From: Russell Schreiber
Sent: Wed, 4 Mar 2015 18:43:09 -0600
To: David Sloan
Cc: Daniel Nix (Wichita Falls); Mark Southard (mark.southard@wichitafallstx.gov); Shawn Garcia
Subject: Re: Proposed Changes to DPR Conditions

David
These are ones I selected as well. Daniel and I,are planning a quick review of his suggestions in the morning and we will send you something tomorrow.

Sent from my iPad

> On Mar 4, 2015, at 5:45 PM, David Sloan <DWS@freese.com> wrote:
>
> Russell, et al:
>
> I prepared the attached list of proposed modifications to the DPR conditions prior to our meeting with TCEQ in January. These were focused on changes related to the incorporation of raw water from Lake Kemp. As we discussed yesterday, this is probably the ideal time to ask for any other changes we think are appropriate, based on the 8 months of operational history and the addition of UV disinfection. I made another pass through Enclosure A and identified a few areas for consideration. I think we should be selective in adding things to the list, focusing on those items we think TCEQ might be in a position to accept, and which make life easier or cheaper for the City. I would suggest consideration of the following items:
>
> 4.f. E. coli at RRWWTP effluent. I understand this was the reason for a shutdown earlier this year, and some relief on this requirement may have avoided the problem. Although we can definitely argue this is mitigated by the addition of the UV disinfection, I think it will be a tough sell to TCEQ.
>
> 4.h. Salt rejection reduction. I propose this wording be adjusted in the second sentence to read "...until the salt rejection returns to within 10% of the unit's acceptable..." not to change the requirement but to address what I consider to be confusing wording.
>
> 4.m. Fast response lab testing for Crypto/Giardia. The City is paying a premium for the fast response on this testing, but this does not prevent release of tainted water to the distribution system as even the fast response will come after the water is distributed. The protection comes from the multiple barriers which have been provided against Crypto/Giardia cysts, to which we have now added UV disinfection. These tests only document after the fact that these organisms do not exist in the finished water, and they never will as long as the systems are functioning properly, which is verified by a number of means. It seems reasonable to relax this to "normal response" and forgo the premium.
>
> 15. Daily pipeline inspections. Given the lack of problems with the pipeline to date (I assume) is there any desire to reduce the frequency of the pipeline inspections, perhaps to once or twice per week?
>
> 25. p. Additional reference to fast-response Crypto/Giardia.
>
> Please let me know if any of these or other items should be added to the list of requested changes. Weather permitting, I should be available to discuss on Thursday.
>
>

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