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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 2, 2014

Mr. John Grant, General Manager
Colorado River Municipal Water District
P. O. Box 869
Big Spring, TX 79721-0869

Re: Summary of findings during the July 31, 2014 TCEQ site Visit:
Big Spring Regional Water Reclamation Plant, Howard County, Texas
RN105692891, TCEQ Public Water Supply: 1140038

Dear Mr. Grant:

On July 31, 2014, Mr. Lindsey Buckner, Ms. Jenifer Okey and Ms. Heather Moore of the Texas Commission on Environmental Quality (TCEQ) Midland Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. Colorado River Municipal Water District's (CRMWD) Big Spring Water Reclamation Plant had received an exception to the TCEQ requirement for a raw water source. The exception allows the use of the City of Big Spring Wastewater Treatment Plant (WWTP) effluent to be treated at the CRMWD reclamation facility by hollow fiber (HF) microfiltration (MF) membranes followed by reverse osmosis (RO) membranes and ultraviolet light (UV) reactors. The treated water will be used as a raw water source for the City of Big Spring (PWS ID 1140001), City of Snyder (PWS ID 2080001, City of Odessa (OWS ID 0680002), City of Stanton (PWS ID 1590001) and City of Midland (PWS ID 1650001) surface water treatment plants (SWTPs). This letter is to summarize the items that were found during the site visit. All references are to Enclosure A in the April 11, 2013 exception letter.

1. **Direct Integrity Test frequency** – As stated in item 3a, a direct integrity test (DIT) must be performed every day. There was no DIT conducted on June 19, 2014. Pall Corporation had reloaded operational programming. Plant started up at 1600 hours. DIT ran after midnight which would be June 20, 2014. Programming was corrected. DITs have been performed daily when plant is in production since then.
2. **Compliance with Notification Requirements** – As stated in item 2, adequate notification must be conducted if the plant shut down is required. Sample taken on November 27, 2013 and reported to CRMWD on December 10, 2013 tested positive for e-coli. Water had been produced November 27, December 5 and December 9, 2013. 0.54 MG produced water left the plant on December 9, 2013. PWSs and TCEQ were notified. Plant shutdown and plant processes tested. DIT performed on MF skids and conductivity monitored on RO process. Subsequent sample showed zero CFU/L. Plant was then restarted. Reference cell was rotated through UV reactors confirming UV performance and hydrogen peroxide dose confirmed. Actions by CRMWD operations personnel appear adequate.
3. **Design Requirements** – As stated in item 38, CRMWD must notify TCEQ plant changes, in this case, antifoulant and chloramine use. The facility now uses

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chloramines for initial disinfection and as substitute for the antifoulant. This change has been submitted for review by TCEQ. If approved, appropriate modifications must be made to the operation and maintenance manual.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Buckner in the Midland Region Office at (432) 570-1359.

Sincerely,

A handwritten signature in cursive script that reads "Wm. Michael Edmiston".

Wm. Michael Edmiston, P.E.
Section Manager
Midland Region

WME/ldb