

Ground Water Rule: Reporting, Recordkeeping, and Compliance

Alex Briceno Roberts
Drinking Water Protection Team

Overview

- Reporting
- Recordkeeping
- Compliance issues - summary of violations

Reporting Requirements

PWS Reporting Requirements

- Must notify TCEQ if the system fails to meet 4-log treatment of viruses by next day
- Must notify TCEQ within 30 days of completion of any corrective action

Recordkeeping Requirements

3-Year Record Retention

- Public notice documentation
- Records of TCEQ-specified minimum residual disinfectant concentration
- Records of lowest daily residual with date and duration of failure to meet specified minimum
 - specific to chemical disinfection

5-Year Record Retention

- Invalidation records of fecal indicator positive sample results
- Documentation of notification to supplier regarding distribution coliform positive
- Records of lowest daily residual with date and duration of failure to meet specified minimum

5-Year Record Retention (cont'd)

- Documentation of compliance with state approved corrective action plan and schedules required to be completed by groundwater systems that must take corrective actions
- Records of compliance for membrane filtration
- CT Study (if applicable)

10-Year Record Retention

- Documentation of corrective actions
- Groundwater monthly operating reports under general MOR statement

Recordkeeping for TCEQ

- Notices of significant deficiencies
- Corrective action plans, schedule approvals, & interim measures
- Notice of corrected significant deficiency
- Documentation of TCEQ's determination that the GWS had a significant distribution deficiency

Recordkeeping for TCEQ

- Invalidation of source sample results
- Triggered Source Water Monitoring Plan approvals
- Notice of minimum residual concentration required

Summary of Violations

Fecal Indicator Related

- Failure to monitor for fecal indicator at source after a distribution positive
- Purchaser of ground water from wholesaler fails to notify provider of a positive distribution sample
- Provider fails to collect source sample for fecal indicator after purchaser reports a positive in their distribution system

Source Related

- Failure to sample all sources providing water to a distribution system after a distribution positive has occurred in that system
- Failure to test source because provider intends to seek an invalidation on a distribution positive, but invalidation isn't granted

Source Related

- Failure to test source because provider intends to claim a distribution deficiency for a distribution positive, but deficiency is rejected
- Wholesaler of ground water gets a fecal positive at the source but fails to inform purchasers within 24 hours
 - Also applies to non-wholesalers not informing customers

Notification and Corrective Action Related

- Failure to notify TCEQ of fecal positive at the source within 24 hours
- Water system fails to do corrective action
- Water system is not in complete compliance with corrective action plan and schedule within 120 days of written notice