

Reunion Ranch BWN Debrief

During the recent boil water notice event we received the standard notification from the WTCPUA that all residents/customers also receive. This was the first issue we came across. Wholesale suppliers, in the past, have always been notified first before the generic notification that everyone receives, goes out.

Improvement made: **We have checked with the WTCPUA to understand why that did not happen. It was later determined that Jennifer Riechers, the PUA General Manager, did not have all the proper contact information. We have given her a list of names with email addresses that include myself, all other account managers, as well as several additional managers within Inframark to insure we are informed first in the future. This notice will list all districts affected by the pressure loss – so there should be no confusion.**

When the initial generic notification came out, it was unclear if Reunion Ranch WCID was affected by the pressure loss in the WTCPUA system. I both emailed and called Ms. Riechers to verify if RRWCID was affected. She then confirmed that the district was, so we began the proper steps of a boil water notice. Those steps include:

- Internal call with account management, operations, compliance, and senior level personnel
 - o From this call we make it clear, to all parties, what their next steps/responsibilities are.
- Compliance begins with notifying TCEQ, producing the formal boil water notice, notifying local news stations, etc.
- Account management notifies the full board and any other communication related entities for e-blasts, etc. This in the case of Reunion Ranch is the HOA, in addition to the WCID board.
- Operations immediately sends staff to take in district samples and those samples are then taken directly to the nearest lab. When the operator arrived at the lab, he asked the lab to provide the PWS number for Reunion Ranch WCID (this is common) and they did. It wasn't until after the samples had been tested that the lab caught they gave the operator the incorrect PWS number and the chain of custody form was no longer valid. This then requires a new sample to be taken and a new COC to be filled out. Once we received the call, again, the operator immediately pulled another sample and delivered it back to the lab and filled out a new chain of custody form.

Improvement made: **Moving forward, all operators now have a list of all PWS numbers in their vehicles with them at all times, as well as stored on their phones and tablets to insure they will be the one supplying the PWS number on the COC forms for all samples (not limited to BWN sampling) to mitigate this issue from happening in the future.**

- After the sample is received at the lab, we await the results to come in. During this process we also await the WTCPUA's rescind notice. When their notice is received before our sample results come back, we must await our sample results (per TCEQ) UNLESS we can obtain written approval from TCEQ to lift the notice prior to our sample results coming back. In this

particular event, I gave the WTCPUA a call to understand how they determine those affected by loss of tank pressure (which is what happened in this instance) and they stated it was strictly based off of pressure planes and Reunion Ranch WCID did fall below the pressure plane of the WTCPUA plant tanks that lost pressure (below 20 PSI).

- o Note: During a boil water notice pressure plays a key role in who will be affected. If at any point in time, if any one portion of the system in Reunion Ranch WCID drops below 20 PSI, that can and will trigger a boil water notice. Additionally, if any portion of the WTCPUA system that feeds water to RRWCID has a pressure loss below 20 PSI, that also trigger's a boil water notice (which is what happened this time).
- In the event we receive our results back prior to the WTCPUA receiving theirs, we then pre-draft our formal and official BWN rescind notice and prepare it for distribution. That way, once the WTCPUA sends theirs out (again, the wholesale suppliers will be notified first in this instance as well), we can immediately issue ours once receiving the WTCPUAs. In the event we cannot obtain written approval from TCEQ to rescind prior to receiving our samples back, we would then have to wait for our sample results to arrive prior to being able to distribute a BW rescind notice.
- Once both the WTCPUA rescind notice has been released and either TCEQ written approval or RRWCID samples come back negative, we then distribute the formalized rescind notice to all the same parties initially notified.

Some things that we (Inframark and the district) are at the mercy of during events like this are:

- Lab hours: Most labs in our area close at 4 PM. This can often make it difficult to get samples to the lab in time to insure testing it performed as timely as possible. There are no labs in our area that are open on weekends. This can be troublesome if the sample was taken to the lab at 7 AM on a Friday, the typical sample turnaround time is 24 hours. This means we would receive results back on Monday morning, at the earliest.
- TCEQ hours and availability for events where their written approval is needed to allow BW rescind notices. While we do have contacts with TCEQ that are available most weekends, it can still be difficult to receive guidance from TCEQ on situations similar to the one recently experience.