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To: <bill.roberts@twdb.state.tx.us>
Date: 9/15/2006 10:14:56 AM
Subject: COMMENTS - STATE WATER PLAN, WATER FOR TEXAS 2007 - REVISED
VERSION

Mr. Roberts

Please disregard the previous email message dated September 14, 2006, transmitting my comments on the draft state water plan.

I inadvertently sent an unedited version.

Sorry for the inconvenience.

Wendell Moody

COMMENTS ON

DRAFT

WATER FOR TEXAS 2007

August 2006

On September 12, 2006, I attended the Public Hearing on the draft State Water Plan, Water For Texas 2007, held in San Angelo, Texas.

I appreciate the presentations made by Mr. David Massey and Mr. Kevin Kluge on the State plan and Region F plan, respectively.

In Mr. Kluge's presentation, he identified two Region F policy recommendations: 1) EPA allowing small, rural communities to use bottled water and 2) requesting EPA to develop rules for disposing of radionuclide waste residuals. I am greatly concerned that these and other water quality recommendations are not incorporated into the state plan, particularly Volume I. Volume I will probably be the document most read.

The Legislature should be made aware of and have the opportunity to address costs and problems associated with implementing water standards for naturally occurring elements in sparsely populated, rural Texas. The Region F plan has made an effort to do so. That effort should be incorporated into the state plan. If relief is not forth coming, rural water suppliers will be forced to raise prices causing users to leave the systems and revert to shallow, undependable wells with poor quality water. Rural Texans, particularly those in agricultural areas, cannot afford "distilled" or "de-mineralized" water being required by USEPA and TCEQ. Potable water has served West Texans for generations.

I recommend that the following be included in Water For Texas 2007.

Volume I -

Page 9, "Increasing cost burdens on local water providers and governments", first paragraph, following the second sentence, add the following sentence: Meeting USEPA and TCEQ's water quality standards for naturally occurring elements such as arsenic, radionuclides, and fluorides are greatly increasing costs, particularly in rural West Texas.

Page 24 and following, add the following "Issue" -

Issue: Water Quality

The Legislature should instruct TCEQ to:

- 1) Authorize small, rural water suppliers who currently cannot afford the necessary capital improvements to their existing water systems and who have no reasonable available alternative water source to utilize bottled water options to the fullest extent possible and apart from the threat of TCEQ enforcement.
- 2) Develop rules for the disposal of constituent residuals that result from water treatment processes for radionuclides and other naturally occurring elements.
- 3) Sponsor oral ingestion studies to determine the epidemiology of radium and other naturally occurring elements in potable water before enforcing minimum MCLs of radium.
- 4) Develop rules for disposal wells that would allow for the disposal of reject water from a membrane treatment plant through a well that is not classified as a "Hazardous Disposal Well".
- 5) Revise its policy on requiring the use of secondary water standards, particularly TDS, when granting permits.

The above instructions are based on the Legislative Recommendations found in Region F Regional Water Plan, Section 8.3.10, pages 8-13 and 8-14. They deal with radionuclides, but have application to other naturally occurring elements such as arsenic and fluorides. Short explanations for each recommendation are given in Section 8.3.10.

Volume II, Edwards-Trinity (Plateau) Aquifer, page 197 -

The water yield ranging from 50 to 1,000 gallons per minute is very misleading. For example, in Concho County, yields range from 1 to 50 gallons per minute with 50 gallons per minute wells being rare. Most wells range from 2 to 10 gpm. I recommend that the wells yield read 5 to 1,000 gallons per minute.

Comments Prepared By:

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