



Texas Commission on Environmental Quality

Protecting Texas by Reducing and Preventing Pollution

June 1, 2016

Mr. Randy Turner, Technical Director
Swan Analytical USA, Inc.
225 Larkin Drive, Unit 4
Wheeling, IL 60090

Re: City of Houston - PWS ID No. 1010013
Request for an Exception to Turbidimeter Calibration Requirement
Southeast Water Plant (TP14837)
Harris County, Texas
RN 101388668 | CN 600128995

Dear Mr. Turner,

On February 29, 2016, the Texas Commission on Environmental Quality (TCEQ) received your letter requesting an exception to the requirement that on-line turbidimeters must be calibrated using a primary standard every 90 days as specified in Title 30 of the Texas Administrative Code (30 TAC) §290.46(s)(2)(B)(iii). This request is for the City of Houston public water system (PWS ID No. 1010013). We received the following information for our review:

- Special Pilot Study conducted at Hurst Creek MUD (PWS ID 2270172);
- Trial Data for Filter effluent at the City of Houston which included:
 - Primary Calibration Data,
 - Secondary Verification Data, and
 - Process Data.

Based on our review, the TCEQ is **granting your request** for an exception to the turbidimeter calibration requirement under the conditions outlines below.

Condition 1:

- **The approved exception only applies to the Swan AMI Turbidiwell WLED (Turbidiwell) turbidimeters, Product Number: A-25.411.700.1, installed at the City of Houston's Southeast Water Plant (TP14837).**

Condition 2:

- **The accuracy of each Turbidiwell unit must be verified at least once every 7 days in accordance with requirements of 30 TAC §290.46(s)(2)(B)(iv).**
 - If the weekly comparison produces a difference greater than 0.10 NTU or 10%, whichever is greater, the operators must verify the accuracy of the instrument(s), secondary standards, and proprietary device (as applicable) with a primary standard.
 - If the primary standard verification indicates there is more than a 0.10 NTU or 10% error, the instrument(s) must be recalibrated with primary standards and the secondary standards or proprietary device must be restandardized.

Condition 3:

- **The accuracy of each Turbidiwell unit must be verified with a primary standard at least once every 12 months. If the primary standard verification indicates there is more than a 0.10 NTU or 10% error, whichever is greater, the instrument must be recalibrated.**

A copy of this letter must be maintained with the water system's records for as long as this exception is in effect. All exceptions are subject to periodic review and may be revoked or amended if warranted as specified in 30 TAC §290.39(l)(2). Noncompliance with any condition stated in this exception letter may result in enforcement action as specified in 30 TAC §290.39(l)(5). This exception is not intended to waive compliance with any other TCEQ requirement in 30 TAC Chapter 290. This exception cannot be used as a defense in any enforcement action resulting from noncompliance with any other requirement of 30 TAC Chapter 290.

If you have questions concerning this letter, or if we can be of additional assistance, please contact Matthew Garrett Heathman by email at matthew.heathman@tceq.texas.gov, by telephone at (512) 239-4006, or by correspondence at the following address:

Technical Review and Oversight Team (MC 159)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Sincerely,



Tamira Konkin-Garcia, Team Leader
Technical Review and Oversight Team
Plan and Technical Review Section
Water Supply Division
Texas Commission on Environmental Quality

TKG/mgh

Cc: Dale A. Rudick, PO Box 1562, Houston, TX 77251-1562
Kira S. Smith, 611 Walker Street FL 21, Houston, TX 77002-4903