

## **Irrigation Systems Deemed to Be Potential Health Hazards**

The Texas Commission on Environmental Quality (TCEQ) has designated an irrigation system as a potential "health" hazard when installed on a site that has a septic system, whether it is an aerobic or conventional type, if connected to a Public Water Supply (PWS). Because of the "health" designation, all irrigation systems installed after 2009 on sites that have a septic system, must have a Reduced Pressure Back-flow Assembly (RPBA) if the irrigation system is connected to a Public Water Supply (PWS). The same requirement applies to any repairs, upgrades, modifications, etc. that are made to any existing irrigation system regardless of when it was originally installed per Chapter 344.52 (A).

The above requirements are also mandated under Landscape-Irrigation Program Rules outlined in Chapter 344. In Chapter 344.50(A) (Back-flow Prevention Methods) it states: "Any irrigation system that is connected to a public or private potable water supply must be connected through a commission-approved back-flow prevention method". Chapter 344.51(D) states: "If an irrigation system is designed or installed on a property that is served by an on-site sewage facility, as defined in Chapter 285 of this title (relating to on-site sewage facilities), then: under Chapter 344.51(D)(2) it states: "Any connections using a private or public potable water source must be connected to the water source through a reduced pressure principle back-flow prevention assembly as defined in Chapter 344.50 of this title (relating to back-flow prevention methods)".

Under Chapter 344.52(C) it states: "The irrigator shall ensure the back-flow prevention device is tested prior to being placed in service and the test results provided to the local water purveyor and the irrigation system's owner or owner's representative within 10 business days of testing of the back-flow prevention device." Please be advised that Twin Creek WSC has never received any test results for back-flow prevention devices from Licensed Irrigation or Plumbing Contractors, non-licensed contractors, or individuals who may have installed their own systems.

So, what does all the above mean? It means that you, as a Member of Twin Creek WSC, have the responsibility to ensure your irrigation system has a RPBA device installed if your system was installed after 2009 or if it has been repaired/modified regardless of the date of original installation. It also means the RPBA must be tested by a certified Back-flow Prevention Assembly Tester (BPAT) and all TCEQ required/approved documentation sent to Twin Creek WSC. It also means you will have to have the RPBA tested annually with the same documentation as above.

This item is now an integral part of the Customer Service Inspection (CSI) which is required on all new accounts, new construction/additions, or plumbing system alterations. Because TCEQ mandates that all Public Water Supply (PWS) purveyors (such as Twin Creek WSC) must enforce this provision as violations are found, it is imperative that corrections are done timely to prevent mandated disconnection of your water service.

If you used a licensed irrigation contractor, you may want to call them concerning their negligence by not giving Twin Creek WSC the BPAT testing documentation when your system was installed if it was after 2009 or when they performed repairs regardless of when your system was installed. You should have leverage over the licensed irrigator because their license can be revoked for this negligence.

Twin Creek WSC management understands that they will be perceived as the "bad guys" since TCEQ mandates that all PWS be the enforcer. We ask for your cooperation and understanding in rectifying this potential health hazard condition and hope all of the Twin Creek WSC Members will work with us so that disconnection of water service will not be necessary.

TCWSC Management