



The Oaks Water Supply Corporation

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We have previously advised you that TCEQ (Texas Commission on Environmental Quality) **requires** us to implement **annual testing** for all backflow prevention devices. In our case, these devices are required anytime there is a landscape irrigation system installed, since all of our properties use some type of on-site sewage facility (OSSF) disposal system. The current TCEQ policy for irrigation systems is contained in Chapter 8 of TCEQ Publication RG-478. The test requirements are specified in 30 TAC 290.44(h)(4). A verbatim extraction of the applicable parts of chapter 8 and 30 TAC 290 are printed on the reverse of this letter. TCEQ has designated the combined use of OSSF's and irrigation systems as a health and safety issue. Therefore, accomplishment by all members who have irrigation systems is mandatory.

After considering all aspects of this requirement and all options available to us, the Board has decided to implement a one year program to bring our water system into compliance. We have approximately 250 installed backflow devices. This has developed into a workload too large for our staff of one to accomplish.

It is mandatory that you contact any licensed contractor of your choice and arrange for testing and service as required, for any backflow prevention device installed on your property. A link to a list of companies employing accredited testers of backflow prevention assemblies cited on the San Antonio Water System web site is available on our web site. This list may not be complete. Since employees change over time and licenses expire, it is your responsibility to assure that the contractor currently employs a licensed BPAT (Backflow Prevention Assembly Tester) employee. This action must be completed before 1 Sep 2018. When testing and any repair has been completed, the (BPAT) licensed contractor is required to furnish a test report to TOWSC. A printable PDF version of this form is available on our web site.

We strongly suggest that you not delay starting your part of the program. Depending on the age and design of your unit(s), required repairs or replacement with a currently approved device may be expensive.

Failure to provide a certified passing test report before 1 Sep 2018, and yearly thereafter, will result in termination of water service.

Kay Day
President

8. Landscape Irrigation

Rules for landscape irrigation in 30 TAC 344 may have an impact on a PWS's cross-connection control program because they have requirements for backflow prevention as well as detailed installation requirements for backflow prevention assemblies. Typically, irrigation systems are a direct cross-connection to the potable-water supply, which requires backflow prevention. Some typical hazards posed by an irrigation system are:

Organisms (parasites, insect larvae, pathogens) living in the water of the irrigation system.

Exposure of the sprinkler heads to fertilizers, herbicides, or pesticides in the yard.

Exposure of the sprinkler heads to fecal matter from animals living on the site (dogs, cats, rodents, farm animals).

Direct connection of chemical additives to the irrigation system.

Connection of alternative water sources (creeks, rainwater harvesting systems, lakes, private wells, stock tanks, etc.).

Backflow will introduce these elements into the potable-water supply at the site and possibly into the water main. Backflow is especially problematic when pathogenic organisms are introduced into the potable-water supply and may propagate to produce waterborne illness.

Many irrigation systems are installed on sites that have an on-site sewage facility (such as a septic tank). The existence of the OSSF elevates the classification of the irrigation system to a health hazard requiring the installation of an RP. Before 2009, a Double-Check Valve Assembly was allowed on irrigation systems installed on sites that also had an OSSF. As a result, there are currently installed irrigation systems that do not have the correct backflow prevention assembly. To address this, the current version of the landscape irrigation rules states:

If an irrigation system is connected to a potable water supply and requires major maintenance, alteration, repair, or service, the system must be connected to the potable water supply through an approved, properly installed backflow prevention method as defined in this title before any major maintenance, alteration, repair, or service is performed. [30 TAC 344.52 (a)]

Licensed irrigators may install backflow prevention assemblies on irrigation systems. Though a licensed irrigator may install the device, it must be tested by a licensed BPAT.

Texas Administrative Code 30 TAC 290.44(h)(4)

Public Drinking Water

All backflow prevention assemblies that are required according to this section and associated table located in 290.47(f) of this title shall be tested upon installation by a licensed backflow prevention assembly tester and certified to be operating within specifications. Backflow prevention assemblies which are installed to provide protection against health hazards must be tested and certified to be operating within specifications at least annually by a licensed backflow prevention assembly tester.