

March 21, 2013

The Honorable (Representative Name)
Address
Capitol Station
Austin, Texas 78711

Re: House Bill 2179 and or SB 1456

On behalf of (your organization), I appeal to you to reconsider HB 2179 and companion SB 1456. If any version of these bills come before you for consideration, I urge you to vote NO. Cross-Connection Control (CCC) and Backflow Prevention are complex water quality concerns; and typically not an area where most plumbers have expertise.

The intent of HB 2179 & SB 1456 is to transfer administration and oversight of the Backflow Prevention Assembly Tester (BPAT) licensing program from TCEQ to the Texas State Board of Plumbing Examiners (TSBPE). The Backflow Prevention program is an integral component of the EPA mandated Cross-Connection Control Program; which is a requirement of the Safe Drinking Water Act, and thereby should be administered and enforced by TCEQ.

The purpose of a BPAT program is to compliment the Cross-Connection program and protect public health by preventing contamination of the public water supplies. The existing BPAT program has been very effective in preventing water contamination and related health outbreaks, as well as training thousands of water utility professional in the state of Texas in the capacity of backflow prevention and cross connection control.

The ramifications of these bills are not in the best interest of public health and safety for the citizens of Texas. We as licensed operators have worked for decades, with the Texas Commission on Environmental Quality (TCEQ) and its predecessor regulatory agencies, to preserve and protect the public health in Texas. There is an outstanding Backflow Program in place at TCEQ, which functions well. Public Water Supplies and Water Professionals today are faced with a multitude of challenges. They know their systems and know what industry standards are. They know what acceptable practices are and how they relate to protecting public health from the hazards of cross connections and backflow incidents. Approval of HB 2179 or SB 1456 would prove detrimental to the current BPAT program and the years of effort to grow and enhance the program to where it is today.

We adamantly oppose the transfer of this BPAT program to the TSBPE. Since the TCEQ has the rule making authority and enforcement responsibilities, it is critical that this BPAT licensing program remain under their control and administration in order to ensure a strong, sound technical training and licensing program.

Thank you for your consideration and for assisting us in protecting the public water supply for the citizens of the State of Texas.

Sincerely,