



Wright Environmental
Environmental Compliance
Municipal & County Environmental Health Services
P. O. Box 332 Iola, TX 77861
817-739-7192
Wrightenvironmental11c@gmail.com

October 22, 2025

Texas Commission On Environmental Quality (TCEQ)
Attn: Office of Occupational Licensing & Registration
12100 Park 35 Circle
Building D
Austin, TX 78753

RE: Comments on Proposed Expansion of Ethics Training

Dear Office of Occupation Licensing & Registration,

The TCEQ is proposing to expand the four (4) hours of ethic training requirement proposed for water and wastewater operators to all licenses issued by the TCEQ. I am opposed to the expansion for the following reasons:

- 1) Many license holders, such as Onsite Sewage Facility (OSSF) Designated Representatives already receive ethics training from the cities, counties, health districts that employ them and therefore proposed ethics training by TCEQ would be redundant and placing additional training costs on government and the private sector. During my thirty (30) year career in government, I took over one hundred continuing education courses including many ethic courses. I am not opposed to training. However, as a small business owner with five (5) licenses over (3) different agencies, adding additional nonessential training requirements impacts the time and cost expended by small businesses, such as mine;
- 2) In the era of promoting small businesses in Texas and providing an environment free of burdensome government regulation, adding additional regulation is not needed or prudent in this instance. The TCEQ is required, in many instances, to provide a cost/benefit analyses of any new proposed regulations. To my knowledge, this process has not been done. In this instance, there will be

additional costs to TCEQ to implement the requirement and for the training providers to create the ethics training that would be reviewed and approved by the TCEQ. Even if the TCEQ argues that it is not an additional cost to the Agency, additional human resources and time will be required. Ultimately, all of the costs associated with the additional ethics training will be passed on to the taxpayers of Texas and to the license holders through higher license and training fees;

- 3) TCEQ received two (2) petitions on September 25, 2024. One from the Water Environment Association of Texas (WEAT) and the other from the Texas Section of the American Water Works Association asking the TCEQ to require the four (4) hours of ethics training for water and wastewater operators. The intent was not to expand to all TCEQ license holders;
- 4) The proposed ethics training impacts TCEQ license holders well beyond water and wastewater operators. It would encompass OSSF, Underground Storage Tank Contractors, Backflow Prevention, and Landscape Irrigation, among others. Most of these license holders are NOT represented by the two associations that petitioned the TCEQ for the ethics training;
- 5) I hold licenses from other State of Texas Agencies, including the Texas Department of Agriculture and the Texas Department of Licensing and Regulation. None of these agencies require ethics training;
- 6) Twenty-Four (24) hours of continuing education is required for the two (2) licenses I hold with the TCEQ. The courses are usually 8-hour courses, which allows me to take three (3) courses to meet the minimum requirements. TCEQ may consider including the four (4) hours of ethics training as part of the twenty-four (24) hours of continuing education. However, the requirement, given the current training provider format, would still result in license holder taking an additional (4) hours of training; and
- 7) Continuing education courses in OSSF currently focus on the OSSF rules and current technology and engineering practices. New OSSF rules are coming in 2026 and courses should focus on education of the new rules and current/emerging technology.

On October 20, 2025, the TCEQ held a stakeholder meeting for water and wastewater operators. During the meeting, comments were made that if water and wastewater operators are required to have four (4) hours of ethics training, then everyone should be required to have the ethics training. The TCEQ responded by sending out an email on October 21, 2025, giving license holders until November 3, 2025 to respond to a

proposed rule change. Many of the thousands of potentially impacted license holders will never see the email (if they have an email registered with TCEQ) and will be unaware of the proposed rule. There is nothing on the TCEQ licensing website on the proposed ethics training requirement expansion. A total lack of transparency by the TCEQ and a failed opportunity for input for a large and diverse group of impacted license holders.

Several important facts related to the proposed ethics training. First, the two associations representing water and wastewater operators ASKED, through petition, for the additional ethics training. None of my associations ASKED or petitioned the TCEQ for the ethics training. Many of the potentially impacted license holders did not participate in the stakeholder meeting as they were not considered stakeholders and would not be impacted by the proposed rule for water and wastewater operators.

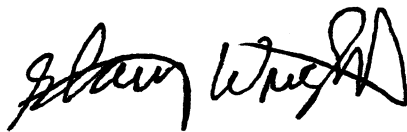
Second, many of us have already had many ethics courses. To attend another ethics course, instead of attending rules and technology courses, is not a prudent use of the limited time and resources that many small businesses allocate.

The last argument against the ethics training is that a State Government Agency, such as the TCEQ, requiring ethics training of private businesses, is a government overreach and is an intrusion into the operation of such businesses.

Having worked for over thirty (30) years in local, county, and state government, including the TCEQ, and having served on the TCEQ Dallas Small Business Advisory Committee for several years, I appreciate the need for fair and reasonable environmental regulation. However, on multiple occasions, I have observed the proposal and/or implementation of environmental regulations that provided little or no benefit to the health, safety, and welfare of Texans.

In closing, it is my hope that the TCEQ will focus on more meaningful and prudent education opportunities for its license holders. Staying current on the regulations and technologies should be the goal of the TCEQ and its license holders. Ultimately, ethics is driven by our morale compass and faith in God. A determination not to be made by a government agency. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacy Wright", with a stylized flourish at the end.

Stacy Wright, MS, RS, REM
Professional Registered Sanitarian #3165
TCEQ Designated Representative #OS0032498
TCEQ Site Evaluator #OS0034586
Licensed Code Enforcement Officer #7905
Registered Environmental Manager #11256