



General Office

November 3, 2025

Ms. Gwen Ricco
MC 205, Office of Legal Services
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: Stakeholder Input on Upcoming Rulemaking Related to Occupational Licensing
Rule Project Number 2025-027-030-WS
Comments of the Trinity River Authority of Texas

To Whom It May Concern:

The Trinity River Authority of Texas (Authority) appreciates the opportunity to provide its written stakeholder comments on the upcoming rulemaking related to occupational licensing RULE PROJECT NUMBER 2025-027-030-WS. This rulemaking is the result of two related petitions approved at the November 20, 2024 (Non-Rule Project Number 2025-005-PET-NR) Commissioner's Agenda, legislative updates from the 89th legislative session, and staff recommended changes.

The Authority's mission is to promote conservation, reclamation, protection, and development of the natural resources of the river basin for the benefit of the public. The Authority owns and operates four water treatment and distribution facilities that help bring clean drinking water to residents throughout the Trinity River Basin. The Authority recognizes the vital role clean water plays in the health and well-being of the communities it serve, and strives to maintain the highest treatment standards using the latest available technology to deliver clear, clean water that meets or exceeds regulatory standards.

The Authority is committed to providing clean water for residents of the Trinity River Basin. Doing so not only meets the immediate water needs of the basin's population, but also helps sustain the overall environmental health of the nearly 18,000-square-mile geographic area. The Authority provides clean water for human, environmental, and economic well-being through the wastewater treatment process. Every year, the Authority's wastewater treatment effluent improves the water quality of the Trinity River, transforming a water body once referred to as a "river of death" into a valuable resource.

The Authority's treatment facilities continue to be recognized by peers in the industry for going above and beyond the call of duty in areas of leadership, management, and operations. The Authority's water and wastewater facilities are staffed with TCEQ licensed operators, and the Authority understands the unique responsibilities of its operators for the treatment of source water to deliver safe, clean drinking water. In addition, Authority operators treat raw wastewater to protect public health.

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The question before us is whether water and wastewater operators should be required to take an ethics course as part of their occupational license renewal hours. Professional engineers and accredited laboratory staff are required to take one hour of ethics training every year. The ethics that we should be considering for these types of licenses should revolve around the aspects that influence the performance of the system. Ethics determinations for these licenses concern making ethical decisions revolving around public health, the safety of Authority employees, and overall water quality. Examples of this include the impacts of making risky decisions, importance of understanding feedback mechanisms in place the quality of sampling/data interpretation, and other specific examples of how decision-making impacts risk. While some associate ethics with strictly a moral code on right/wrong, ethics can be violated by simply not knowing how decisions impact results.

The Authority agrees that an ethics requirement for water and wastewater operators is necessary. It emphasizes just how important operators are on the front lines of protecting public health and safety and the quality of water and wastewater services. The Authority would like to see a requirement similar to professional engineers and laboratory staff and supports the hours of ethics training during each three-year license renewal cycle.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Kevin Ward", is positioned above a horizontal line.

J. KEVIN WARD
General Manager