



TCEQ - MC205 - Office of Legal Services
Texas Commission on Environmental Quality
P.O. Box 13087, Austin, Texas 78711-3087
RE: Rule Project Number 2025-027-030-WS

November 3, 2025

Dear Ms. Ricco,

As President of a company that employs water operators, serving as a Director on the American Water Works Association (AWWA) board, and an active member of the Water Environment Association of Texas (WEAT), I strongly encourage the TCEQ to approve and adopt the proposed license requirement of adding four hours to the existing 30 hours of continuing education units (CEU) required for renewal every three years. This requirement is essential to maintain the integrity and public trust in the water industry.

The men and women currently serving in this industry are some of the most professional and well-trained individuals. However, at times there may be scenarios they face that may test their judgement. Having access to regular ethics training will help them adequately address issues that may arise which could result in adverse public health consequences.

As the potential for adverse public health consequences from water/wastewater noncompliance has become more publicly known, the need for operators who can perform their duties both correctly and ethically has become increasingly critical.

Engineers and other professions require an ethics component for their respective continuing education requirements; the renewal requirement does not add more hours to the existing 30-hour requirement; rather it replaces four hours with existing hours.

Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads 'Elston H. Johnson'.

Elston Johnson,
President
Elston Johnson and Associates