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November 3, 2025

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

Via electronic submission

**Re: Texas Rural Water Association Comments on TCEQ Rule Project Number
2025-027-030-WS**

Dear Ms. Ricco:

The Texas Rural Water Association (TRWA) thanks the Texas Commission on Environmental Quality (TCEQ) for the opportunity to comment on Petitioners' Water Environment Association of Texas (WEAT) and the Texas Section of the American Water Works Association (TAWWA) (petitioners) request that the TCEQ revise 30 Texas Administrative Code (TAC) Sections 30.392 and 30.342 to require continuing education (CE) ethics training as a prerequisite for renewal of all public water system and wastewater operator licenses. Petitioners want to require all TCEQ licensed public water system water and wastewater operators to take four hours of ethics training as part of the 30 CE credits they currently need to renew their operator's license. Requiring four hours of mandatory ethics training will take too much time away from other substantive core elements that operators need to be trained in. Ethics training is also already incorporated into the curriculum of operator certification classes.

I. Introduction.

The TRWA is a nonprofit trade association whose membership includes more than 880 retail water and sewer utilities that collectively provide potable water and wastewater services to approximately 3.5 million Texan residents. Most of our members are non-profit water supply corporations (WSC) and sewer service corporations (SSC), water districts, and small cities. TRWA's knowledge about water and wastewater operator licensing requirements comes from

TRWA's TCEQ certified instructors who teach TCEQ approved operator certification courses. TRWA also relies upon its experience working with many licensed operators through its state and federal technical assistance contracts in making the following observations and comments on this Rule Petition.

II. TRWA Rule Comments.

TRWA appreciates being a partner in this process and supports, and incorporates, ethics training into our current classes. However, TRWA is concerned about the potential adverse impacts on safety and compliance that could be caused by displacing so much of the required core operator training in industry standards and regulations with ethics training. This is especially concerning because 2 credit hours of a water operator's core CE requirements have already recently been replaced by the new resiliency training requirements. Adding another 4 mandatory hours of ethics will essentially reduce a water operator's traditional core technical training by 20%.

Four hours of ethics is too much. Rural water utilities need operators with current knowledge of all the ever-increasing regulations to ensure clean and safe water for the public and to maintain the water infrastructure necessary to keep service areas economically viable. Operators for rural systems are often the only person responsible for complying with all applicable federal and state regulations and for supplying their rural community with safe drinking water and sanitation. Significantly reducing an operator's core technical education is not the path to take to make our communities safer.

Additional ethics training is not needed. Ethics training is already part of the core curriculum of the 20-hour courses for license renewal. There are no separate specific ethics rules for water and wastewater operators to learn. Every time a core curriculum course reviews rules and reporting requirements, ethics are covered. The Water Utility Management 20-hour core curriculum classes have an especially robust ethics section. Moreover, Texas licensed engineers are only required to take one hour of ethical training.

TRWA is also concerned about promulgating regulations to fix a problem that petitioners have provided no evidence pervades the industry. Ethics violations are best dealt with by the utility employer through disciplinary action as opposed to creating a new requirement for all. The

petitioners also don't cite to any state in the United States that currently requires water and wastewater operators to comply with a mandatory ethics training requirement to renew their operator licenses. Ultimately, TRWA is against displacing needed core training with ethics training.

III. TRWA's Proposed Rule Change.

TRWA believes that ethics is important; however, mandatory ethics should not replace four hours of the core curriculum. If TCEQ agrees with the petitioners that ethics training should be required as part of an operator's license renewal, TRWA suggests that one hour is sufficient, which is on par with what is required of Texas licensed engineers. If TCEQ determines that ethics training should be required, TRWA would like to propose the following rule changes to require a one-hour ethics class that counts toward an operator's required CE credits to renew their operator's license. The TCEQ could revise 30 Texas Administrative Code (TAC) Sections 30.392 and 30.342 to include the following language:

(e) Individuals with a license ~~are required~~ shall complete at least ~~four~~ one hours of continuing education in ethics as part of the continuing education requirement to renew a license.

TRWA appreciates the opportunity to comment.

Respectfully submitted 11/03/2025:

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