

Drew Molly

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 the Chief Water Officer for the City of Houston, a Director of the American Water Works Association (AWWA), 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 does not add more hours to the existing 30-hour requirement; rather it replaces four hours with existing hours.

Some may argue that adding ethics hours to the CEU requirement will not change the behavior and mindset of the men and women we trust to operate this critical infrastructure. While that may be true, it is imperative that our organizations devote critical time to ensure that our teams are reminded of the oath they take to protect and uphold public health. Purposeful and/or deceitful practices can have a significant impact on public trust and the safety of our communities.

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; it is time that operators have the same requirement. Given the all-too-frequent occurrences of ethical lapses of judgement in our society, it is imperative that our employees have this reoccurring training.

Please feel free to contact me with any questions.

Regards,

Drew Molly
Chief Water Officer – Houston Public Works
City of Houston

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