

Sunset Advisory Commission—Hearing on TCEQ, December 15, 2010

To: Mr. Chairman-Senator Hegar, Mr. Vice Chairman-Rep. Bonnen,
Members of the Commission, Ladies and Gentlemen.

On behalf of: Martin Luther Lutheran Church, Coletoville—PWS #2350060
And all of the small rural churches which have not yet come to the
attention of TCEQ.

I am Sharon Wiggins and have served as Pastor at Martin Luther Lutheran Church since 2003.

In July of this year we submitted a package to the Sunset Advisory Commission describing our experience and making suggestions to help alleviate the undue burden placed on small rural churches when they come to the attention of TCEQ.

In May of 2007 we received a letter from TCEQ stating that if we served 25 people at least 60 days in one year we may be a public water system. TCEQ subsequently determined that we were indeed a public water system.

We are requesting a re-evaluation of the interpretation and application of the 25people/60 days rule as it relates to small rural churches.

At the present time this is based on the number of members and the number of services a year without regard to the usage of water or purpose of gathering.

Basically, if 25 people attend Sunday morning worship 52 wks in the year plus 8 special services during the year and the church has indoor plumbing, it qualifies as a public water system. Even though the people have only come in, sang hymns, prayed, read the Bible and listened to a sermon for an hour or so. Mostly, we come to church to worship and go home to eat.

If, small rural churches must be considered as potential public water systems, we would like the 25/60 rule to be applied only to the times when a small rural church has a congregational meal and thus provides water to people in a way that might actually affect the public health.

If a small rural church is deemed to be a Public Water System, we respectfully request the following three things:

1. The grandfathering in of the existing domestic well.

Note: The cost of retro-actively bringing an existing domestic well into compliance is very high (it easily runs between \$7,000 and \$10,000) with no improvement of the water quality or safety.

2. Bacteria and chlorine water samples to be taken without needing a class D water license
3. and no other testing be required that is not required of domestic wells in the area.

We believe these steps are sufficient to protect our water supplies and safe guard the public health.

An unintended consequence of deeming a small rural church to be Public Water System is to jeopardize the very existence of the congregations TCEQ is trying to protect, with no significant improvement to public health.

We thank you for your attention to this matter.

The Rev. Sharon Wiggins