

# DRAFT FEASIBILITY REPORT FEASIBILITY ANALYSIS OF WATER SUPPLY FOR SMALL PUBLIC WATER SYSTEMS

WHORTON MOBILE HOME PARK  
PWS ID# 1520149

*Prepared for:*

**THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**



*Prepared by:*

**THE UNIVERSITY OF TEXAS BUREAU OF ECONOMIC GEOLOGY**

**AND**

**PARSONS**

*Preparation of this report was financed by the Texas Commission on Environmental Quality through the Drinking Water State Revolving Fund Small Systems Assistance Program*

**AUGUST 2008**

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**AUGUST 2008**

## EXECUTIVE SUMMARY

### INTRODUCTION

The University of Texas Bureau of Economic Geology (BEG) and its subcontractor, Parsons Transportation Group Inc. (Parsons), was contracted by the Texas Commission on Environmental Quality (TCEQ) to conduct a project to assist with identifying and analyzing alternatives for use by Public Water Systems (PWS) to meet and maintain Texas drinking water standards.

The overall goal of this project was to promote compliance using sound engineering and financial methods and data for PWSs that had recently recorded sample results exceeding maximum contaminant levels (MCL). The primary objectives of this project were to provide feasibility studies for PWSs and the TCEQ Water Supply Division that evaluate water supply compliance options, and to suggest a list of compliance alternatives that may be further investigated by the subject PWS for future implementation. This feasibility report provides an evaluation of water supply alternatives for the Whorton Mobile Home Park (MHP) PWS, PWS ID# 1520149, located in Lubbock County. Whorton MHP is a residential mobile home park located within the city limits of Lubbock at 128 E. 86<sup>th</sup> Street, near the intersection of East 86<sup>th</sup> Street and Cedar Avenue. The water supply system serves a population of 60 and has 26 connections. The water sources are two groundwater wells completed to depths of approximately 143 feet in the Ogallala Aquifer. Well #1 (G1520149A) and Well #2 (G1520149B) are both rated at 15 gallons per minute.

The Whorton MHP PWS recorded fluoride concentrations of 4.0 milligrams per liter (mg/L) to 7.7 mg/L from January 2002 to June 2003, which exceeds the MCL of 4 mg/L. Arsenic has been detected at concentrations ranging between 0.0152 mg/L to 0.0202 mg/L from July 2006 through December 2007, which exceeds the MCL of 0.01 mg/L that went into effect on January 23, 2006 (USEPA 2008a; TCEQ 2004). Therefore, Whorton MHP faces compliance issues under the water quality standards for these contaminants.

Basic system information for the Whorton MHP PWS is shown in Table ES.1.

**Table ES.1 Whorton MHP PWS  
Basic System Information**

Population served	60
Connections	26
Average daily flow rate	0.0054 million gallons per day (mgd)
Peak demand flow rate	15.0 gallons per minute
Water system peak capacity	0.072 mgd
Typical arsenic range	0.0152 mg/L – 0.0202 mg/L
Typical fluoride	4.0 mg/L – 7.7 mg/L

### STUDY METHODS

The methods used for this project were based on a pilot project performed in 2004 and 2005 by TCEQ, BEG, and Parsons. Methods for identifying and analyzing compliance options were developed in the pilot project (a decision tree approach).

The process for developing the feasibility study used the following general steps:

- Gather data from the TCEQ and Texas Water Development Board databases, from TCEQ files, and from information maintained by the PWS;
- Conduct financial, managerial, and technical (FMT) evaluations of the PWS;
- Perform a geologic and hydrogeologic assessment of the study area;
- Develop treatment and non-treatment compliance alternatives which, in general, consist of the following possible options:
  - Connecting to neighboring PWSs via new pipeline or by pumping water from a newly installed well or an available surface water supply within the jurisdiction of the neighboring PWS;
  - Installing new wells within the vicinity of the PWS into other aquifers with confirmed water quality standards meeting the MCLs;
  - Installing a new intake system within the vicinity of the PWS to obtain water from a surface water supply with confirmed water quality standards meeting the MCLs;
  - Treating the existing non-compliant water supply by various methods depending on the type of contaminant; and
  - Delivering potable water by way of a bottled water program or a treated water dispenser as an interim measure only.

- 1           • Assess each of the potential alternatives with respect to economic and non-  
2           economic criteria;  
3           • Prepare a feasibility report and present the results to the PWS.

4           This basic approach is summarized in Figure ES.1.

## 5           **HYDROGEOLOGICAL ANALYSIS**

6           The Whorton MHP PWS obtains groundwater from the Ogallala-North Aquifer (total  
7           suspended solids < 500 mg/L). Arsenic and fluoride are commonly found in area wells at  
8           concentrations greater than the MCL. Several unused wells to the north of the PWS wells show  
9           acceptable levels of fluoride and nitrate but have not been sampled for arsenic, selenium, or  
10          uranium. They would need to be sampled before being considered as an alternative supply.

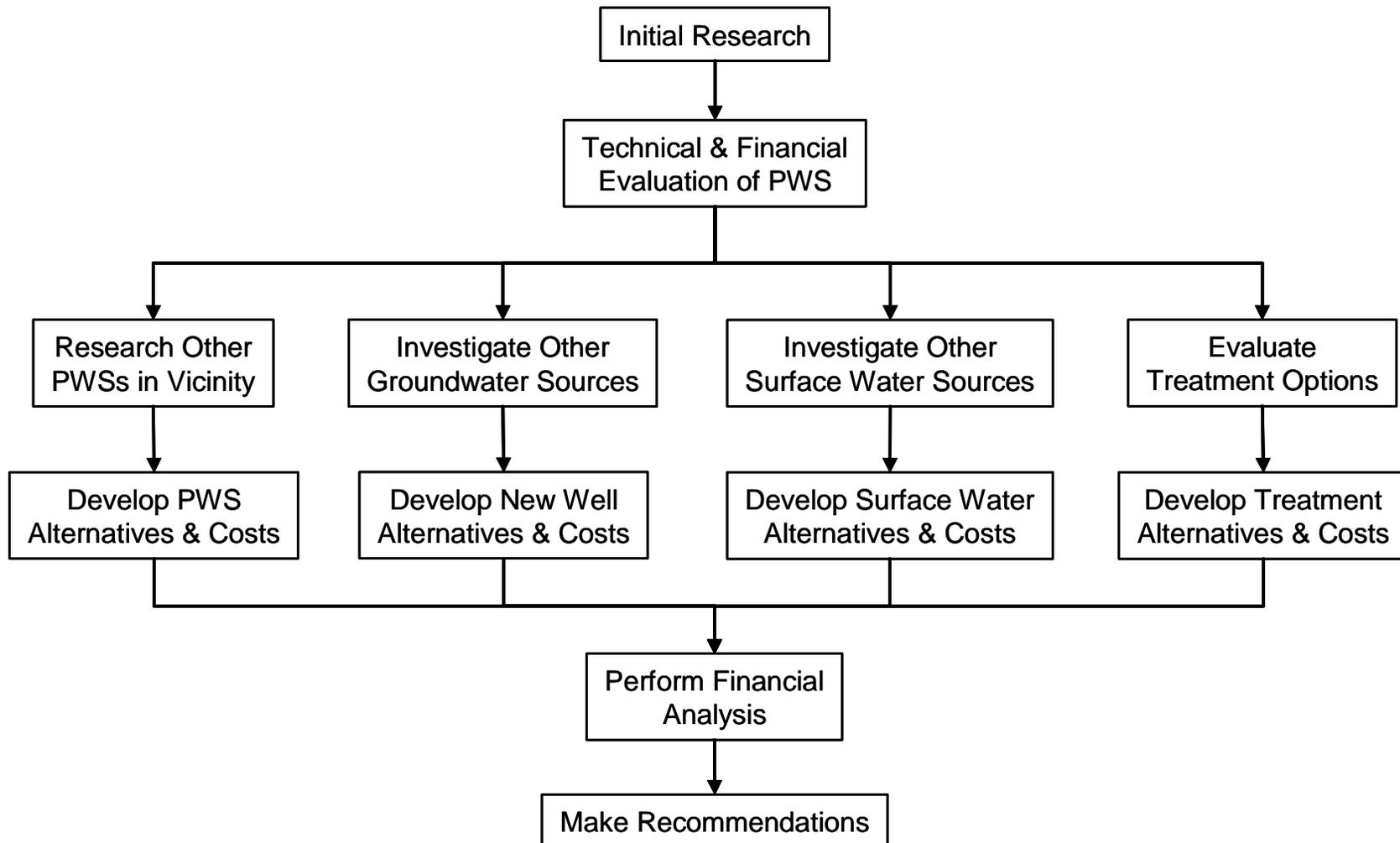
11          The two system wells should be characterized to determine the water quality of each well.  
12          If one of the wells is found to produce compliant water, as much production as possible should  
13          be shifted to that well as a method of achieving compliance. It may also be possible to do  
14          down-hole testing on non-compliant wells to determine the source of the contaminants. If the  
15          contaminants derive primarily from a single part of the formation, that part could be excluded  
16          by modifying the existing well, or avoided altogether by completing a new well.

17          Regional analyses show that water quality tends to improve when wells are greater than  
18          250 feet deep. Therefore, deepening the existing Whorton MHP PWS wells could provide an  
19          additional way to meet water quality standards, provided the aquifer is thick enough.

20

1

Figure ES.1 Summary of Project Methods



## 1 COMPLIANCE ALTERNATIVES

2 Overall, the system had an inadequate level of FMT capacity. The system had some areas  
3 that needed improvement to be able to address future compliance issues; however, the system  
4 does have many positive aspects, including a dedicated owner/manager. Areas of concern for  
5 the system included lack of long-term capital planning, lack of separate accounting for the  
6 water system, lack of compliance with the fluoride and arsenic standards, and lack of  
7 knowledge of SDWA regulations.

8 There are several PWSs within 10 miles of Whorton MHP. Many of these nearby systems  
9 also have problems with arsenic and fluoride. In general, feasibility alternatives were  
10 developed based on obtaining water from the nearest PWSs, either by directly purchasing  
11 water, or by expanding the existing well field. There is a minimum of surface water available  
12 in the area. Obtaining a new surface water source is considered through an alternative where  
13 surface water is obtained from the Canadian River Municipal Water Authority (CRMWA) and  
14 treated by the City of Lubbock prior to distribution. In addition to the CRMWA, the City of  
15 Lubbock is a potential large regional water supplier that could potentially supply water to  
16 Whorton MHP.

17 Centralized treatment alternatives for arsenic and fluoride removal have been developed  
18 and were considered for this report; for example, reverse osmosis and electro dialysis reversal.  
19 Point-of-use (POU) and point-of-entry treatment alternatives were also considered. Temporary  
20 solutions such as providing bottled water or providing a centralized dispenser for treated or  
21 trucked-in water, were also considered as alternatives.

22 Developing a new well close to Whorton MHP is likely to be the best solution if compliant  
23 groundwater can be found. Having a new well close to Whorton MHP is likely to be one of the  
24 lower cost alternatives since the PWS already possesses the technical and managerial expertise  
25 needed to implement this option. The cost of new well alternatives quickly increases with  
26 pipeline length, making proximity of the alternate source a key concern. A new compliant well  
27 or obtaining water from a neighboring compliant PWS has the advantage of providing  
28 compliant water to all taps in the system.

29 Central treatment can be cost-competitive with the alternative of new nearby wells, but  
30 would require significant institutional changes to manage and operate. Similar to obtaining an  
31 alternate compliant water source, central treatment would provide compliant water to all water  
32 taps.

33 POU treatment can be cost competitive, but does not supply compliant water to all taps.  
34 Additionally, significant efforts would be required for maintenance and monitoring of the POU  
35 treatment units.

36 Providing compliant water through a central dispenser is significantly less expensive than  
37 providing bottled water to 100 percent of the population, but a significant effort is required for  
38 clients to fill their containers at the central dispenser.

1 **FINANCIAL ANALYSIS**

2 A financial analysis of the various alternatives for the Whorton MHP PWS was performed  
3 using estimated system expenses. Estimated values were used since complete financial data for  
4 the water system were not available. Table ES.2 provides a summary of the financial impact of  
5 implementing selected compliance alternatives, including the rate increase necessary to meet  
6 current operating expenses. The alternatives were selected to highlight results for the best  
7 alternatives from each different type or category

8 Some of the compliance alternatives offer potential for shared or regional solutions. A  
9 group of PWSs could work together to implement alternatives for developing a new  
10 groundwater source or expanding an existing source, obtaining compliant water from a large  
11 regional provider, or for central treatment. Sharing the cost for implementation of these  
12 alternatives could reduce the cost on a per user basis. Additionally, merging PWSs or  
13 management of several PWSs by a single entity offers the potential for reduction in  
14 administrative costs.

15 **Table ES.2 Selected Financial Analysis Results**

Alternative	Funding Option	Average Annual Water Bill	Percent of MHI
Current	NA	\$180	0.6
To meet current expenses	NA	\$300	1.0
Purchase water from Lubbock	100% Grant	\$1,386	4.5
	Loan/Bond	\$2,707	8.9
Central RO treatment	100% Grant	\$2,461	8.1
	Loan/Bond	\$3,946	12.9
Point-of-use	100% Grant	\$1,135	3.7
	Loan/Bond	\$1,234	4.0
Public dispenser	100% Grant	\$1,631	5.3
	Loan/Bond	\$1,685	5.5

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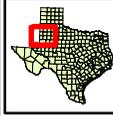
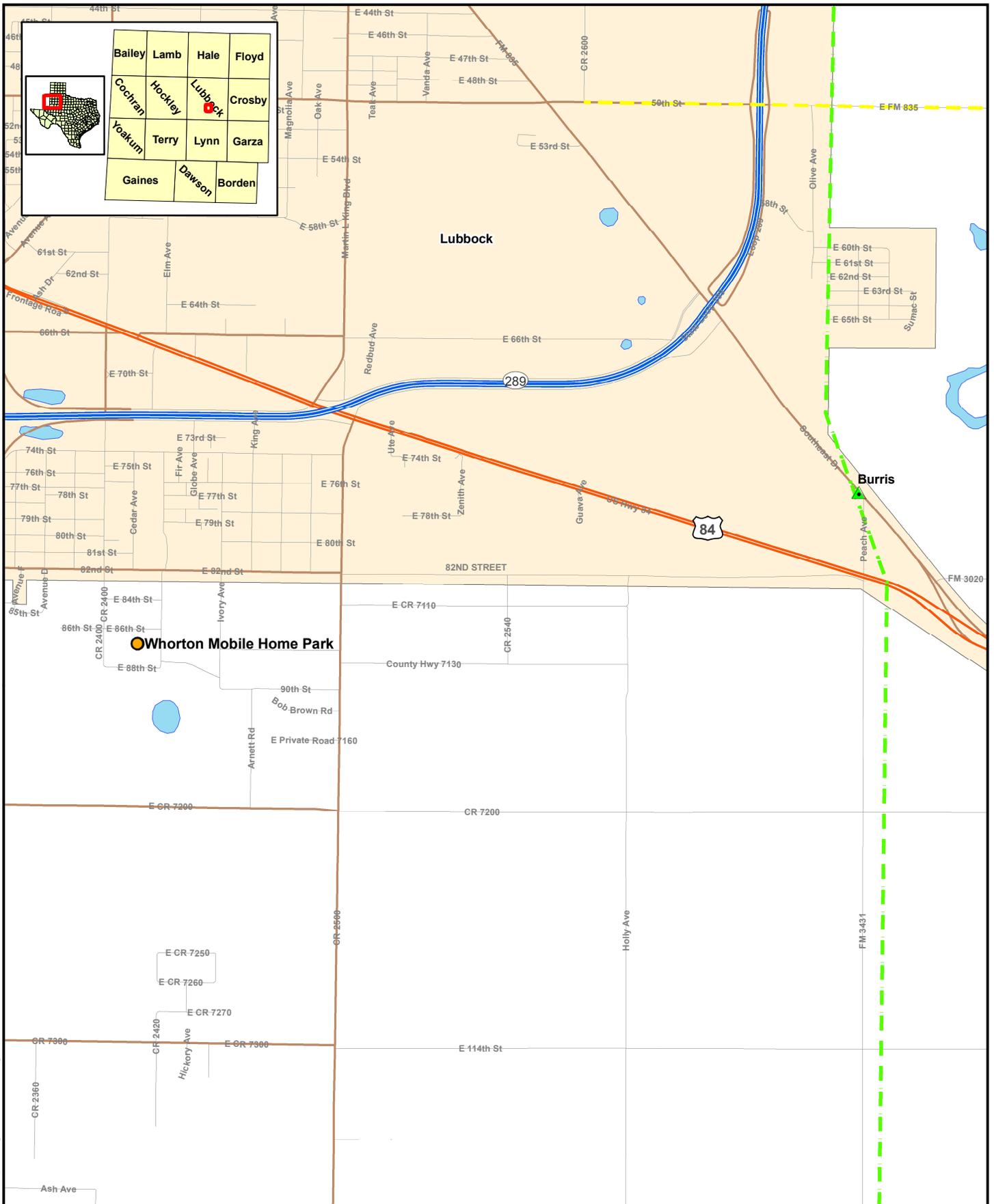
## ACRONYMS AND ABBREVIATIONS

µg/L	Micrograms per liter
°F	Degrees Fahrenheit
ANSI	American National Standards Institute
AFY	acre-foot per year
BAT	Best available technology
BEG	Bureau of Economic Geology
CA	Chemical analysis
CCN	Certificate of Convenience and Necessity
CDBG	Community Development Block Grants
CFR	Code of Federal Regulations
CRMWA	Canadian River Municipal Water Authority
DWSRF	Drinking Water State Revolving Fund
ED	Electrodialysis
EDR	Electrodialysis reversal
FMT	Financial, managerial, and technical
GAM	Groundwater Availability Model
gpd	gallons per day
HUD	U.S. Department of Housing and Urban Development
IX	Ion exchange
LARS	Lubbock Area Regional Solution
MCL	Maximum contaminant level
mgd	Million gallons per day
MHI	Median household income
MHP	Mobile Home Park
NF	nanofiltration
NMEFC	New Mexico Environmental Financial Center
NPDWR	National Primary Drinking Water Regulations
NURE	National Uranium Resource Evaluation
O&M	Operation and Maintenance
ORCA	Office of Rural Community Affairs
Parsons	Parsons Transportation Group, Inc.
POE	Point-of-entry
POU	Point-of-use
PWS	Public water system
RO	Reverse osmosis
SDWA	Safe Drinking Water Act
TAC	Texas Administrative Code

TCEQ	Texas Commission on Environmental Quality
TCF	Texas Capital Fund
TDS	Total dissolved solids
TFC	thin film composite
TWDB	Texas Water Development Board
USC	United States Code
USEPA	United States Environmental Protection Agency
VOC	Volatile organic compound
WAM	Water Availability Model

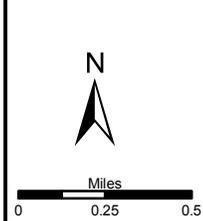
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Bailey	Lamb	Hale	Floyd
Cochran	Hockley	Lubbock	Crosby
Yoakum	Terry	Lynn	Garza
Gaines	Dawson	Borden	

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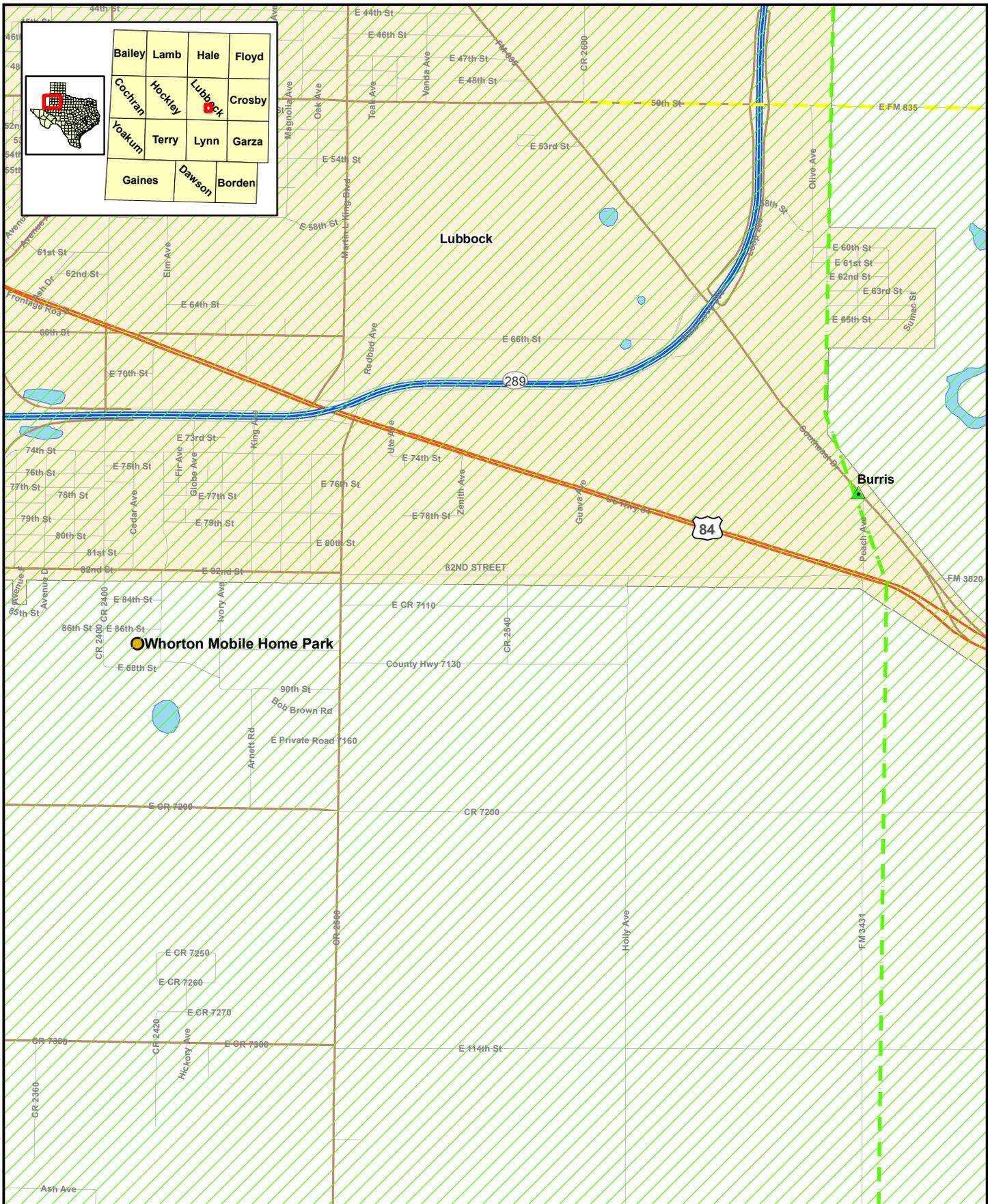


- Legend**
- Study System
  - Interstate
  - PWS's
  - Highway
  - Cities
  - Major Road
  - City Limits
  - Minor Road
  - Counties

**Figure 1.1**

**WHORTON MOBILE HOME PARK**

**Location Map**



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**Legend**

- Study System
- Interstate
- High Plains UWCD No.1
- PWS's
- Highway
- Cities
- Major Road
- City Limits
- Minor Road
- Counties

**Figure 1.2**

**WHORTON MOBILE HOME PARK  
Groundwater Conservation Districts**

## 1.1 PUBLIC HEALTH AND COMPLIANCE WITH MCLs

The goal of this project is to promote compliance for PWSs that supply drinking water exceeding regulatory MCLs. This project only addresses those contaminants and does not address any other violations that may exist for a PWS. As mentioned above, the Whorton MHP water system had recent sample results exceeding the MCL for fluoride and arsenic. In general, contaminant(s) in drinking water above the MCL(s) can have both short-term (acute) and long-term or lifetime (chronic) effects. Health concerns related to drinking water above MCLs for these two chemicals are briefly described below.

Potential health effects from the ingestion of water with levels of fluoride above the MCL (4 mg/L) over many years include bone disease, including pain and tenderness of the bones. Additionally, the U.S. Environmental Protection Agency (USEPA) has set a secondary fluoride standard of 2 mg/L to protect against dental fluorosis, which in its moderate or severe forms may result in a brown staining and/or pitting of the permanent teeth in children under nine years of age (USEPA 2008c).

Potential health effects from long-term ingestion of water with levels of arsenic above the MCL (0.010 mg/L) include non-cancerous effects, such as cardiovascular, pulmonary, immunological, neurological and endocrine effects, and cancerous effects, including skin, bladder, lung, kidney, nasal passage, liver and prostate cancer (USEPA 2008b).

## 1.2 METHOD

The method for this project follows that of a pilot project performed by TCEQ, BEG, and Parsons. The pilot project evaluated water supply alternatives for PWSs that supplied drinking water with contaminant concentrations above USEPA and Texas drinking water standards. Three PWSs were evaluated in the pilot project to develop the method (*i.e.*, decision tree approach) for analyzing options for provision of compliant drinking water. This project is performed using the decision tree approach that was developed for the pilot project, and which was also used for subsequent projects.

Other tasks of the feasibility study are as follows:

- Identifying available data sources;
- Gathering and compiling data;
- Conducting financial, managerial, and technical (FMT) evaluations of the selected PWSs;
- Performing a geologic and hydrogeologic assessment of the area;
- Developing treatment and non-treatment compliance alternatives;
- Assessing potential alternatives with respect to economic and non-economic criteria;
- Preparing a feasibility report; and

- 1 • Suggesting refinements to the approach for future studies.

2 The remainder of Section 1 of this report addresses the regulatory background, and  
3 provides a summary of fluoride and arsenic abatement options. Section 2 describes the method  
4 used to develop and assess compliance alternatives. The groundwater sources of fluoride and  
5 arsenic are addressed in Section 3. Findings for the Whorton Mobile Home Park PWS, along  
6 with compliance alternatives development and evaluation, can be found in Section 4. Section 5  
7 references the sources used in this report.

### 8 **1.3 REGULATORY PERSPECTIVE**

9 The Utilities & Districts and Public Drinking Water Sections of the TCEQ Water Supply  
10 Division are responsible for implementing requirements of the Federal Safe Drinking Water  
11 Act (SDWA) which include oversight of PWSs and water utilities. These responsibilities  
12 include:

- 13 • Monitoring public drinking water quality;
- 14 • Processing enforcement referrals for MCL violators;
- 15 • Tracking and analyzing compliance options for MCL violators;
- 16 • Providing FMT assessment and assistance to PWSs;
- 17 • Participating in the Drinking Water State Revolving Fund program to assist PWSs  
18 in achieving regulatory compliance; and
- 19 • Setting rates for privately owned water utilities.

20 This project was conducted to assist in achieving these responsibilities.

### 21 **1.4 ABATEMENT OPTIONS**

22 When a PWS exceeds a regulatory MCL, the PWS must take action to correct the  
23 violation. The MCL exceedances at the Whorton MHP PWS involve fluoride and arsenic. The  
24 following subsections explore alternatives considered as potential options for  
25 obtaining/providing compliant drinking water.

#### 26 **1.4.1 Existing Public Water Supply Systems**

27 A common approach to achieving compliance is for the PWS to make arrangements with a  
28 neighboring PWS for water supply. For this arrangement to work, the PWS from which water  
29 is being purchased (supplier PWS) must have water in sufficient quantity and quality, the  
30 political will must exist, and it must be economically feasible.

##### 31 **1.4.1.1 Quantity**

32 For purposes of this report, quantity refers to water volume, flowrate, and pressure. Before  
33 approaching a potential supplier PWS, the non-compliant PWS should determine its water

1 demand on the basis of average day and maximum day. Peak instantaneous demands can be  
2 met through proper sizing of storage facilities. Further, the potential for obtaining the  
3 appropriate quantity of water to blend to achieve compliance should be considered. The  
4 concept of blending involves combining water with low levels of contaminants with non-  
5 compliant water in sufficient quantity that the resulting blended water is compliant. The exact  
6 blend ratio would depend on the quality of the water a potential supplier PWS can provide, and  
7 would likely vary over time. If high quality water is purchased, produced or otherwise  
8 obtained, blending can reduce the amount of high quality water required. Implementation of  
9 blending will require a control system to ensure the blended water is compliant.

10 If the supplier PWS does not have sufficient quantity, the non-compliant community could  
11 pay for the facilities necessary to increase the quantity to the extent necessary to supply the  
12 needs of the non-compliant PWS. Potential improvements might include, but are not limited  
13 to:

- 14 • Additional wells;
- 15 • Developing a new surface water supply,
- 16 • Additional or larger-diameter piping;
- 17 • Increasing water treatment plant capacity
- 18 • Additional storage tank volume;
- 19 • Reduction of system losses,
- 20 • Higher-pressure pumps; or
- 21 • Upsized, or additional, disinfection equipment.

22 In addition to the necessary improvements, a transmission pipeline would need to be  
23 constructed to tie the two PWSs together. The pipeline must tie-in at a point in the supplier  
24 PWS where all the upstream pipes and appurtenances are of sufficient capacity to handle the  
25 new demand. In the non-compliant PWS, the pipeline must tie in at a point where no down  
26 stream bottlenecks are present. If blending is the selected method of operation, the tie-in point  
27 must be selected to ensure all the water in the system is blended to achieve regulatory  
28 compliance.

#### 29 **1.4.1.2 Quality**

30 If a potential supplier PWS obtains its water from the same aquifer (or same portion of the  
31 aquifer) as the non-compliant PWS, the quality of water may not be significantly better.  
32 However, water quality can vary significantly due to well location, even within the same  
33 aquifer. If localized areas with good water quality cannot be identified, the non-compliant  
34 PWS would need to find a potential supplier PWS that obtains its water from a different aquifer  
35 or from a surface water source. Additionally, a potential supplier PWS may treat non-  
36 compliant raw water to an acceptable level.

1 Surface water sources may offer a potential higher-quality source. Since there are  
2 significant treatment requirements, utilization of surface water for drinking water is typically  
3 most feasible for larger local or regional authorities or other entities that may provide water to  
4 several PWSs. Where PWSs that obtain surface water are neighbors, the non-compliant PWS  
5 may need to deal with those systems as well as with the water authorities that supply the  
6 surface water.

## 7 **1.4.2 Potential for New Groundwater Sources**

### 8 **1.4.2.1 Existing Non-Public Supply Wells**

9 Often there are wells not associated with PWSs located in the vicinity of the non-compliant  
10 PWS. The current use of these wells may be for irrigation, industrial purposes, domestic  
11 supply, stock watering, and other purposes. The process for investigating existing wells is as  
12 follows:

- 13 • Existing data sources (see below) will be used to identify wells in the areas that  
14 have satisfactory quality. For the Whorton MHP PWS, the following standards  
15 could be used in a rough screening to identify compliant groundwater in  
16 surrounding systems:
  - 17 ○ Nitrate (measured as nitrogen) concentrations less than 8 mg/L (below the MCL  
18 of 10 mg/L);
  - 19 ○ Fluoride concentration less than 2.0 mg/L (below the Secondary MCL of  
20 2 mg/L);
  - 21 ○ Arsenic concentration less than 0.008 mg/L (below the MCL of 0.01 mg/L);
  - 22 ○ Uranium concentration less than 0.024 mg/L (below the MCL of 0.030 mg/L;  
23 and
  - 24 ○ Selenium concentration less than 0.04 mg/L (below the MCL of 0.05 mg/L).
- 25 • The recorded well information will be reviewed to eliminate those wells that appear  
26 to be unsuitable for the application. Often, the “Remarks” column in the Texas  
27 Water Development Board (TWDB) hard-copy database provides helpful  
28 information. Wells eliminated from consideration generally include domestic and  
29 stock wells, dug wells, test holes, observation wells, seeps and springs, destroyed  
30 wells, wells used by other communities, etc.
- 31 • Wells of sufficient size are identified. Some may be used for industrial or irrigation  
32 purposes. Often the TWDB database will include well yields, which may indicate  
33 the likelihood that a particular well is a satisfactory source.
- 34 • At this point in the process, the local groundwater control district (if one exists)  
35 should be contacted to obtain information about pumping restrictions. Also,  
36 preliminary cost estimates should be made to establish the feasibility of pursuing  
37 further well development options.

- 1 • If particular wells appear to be acceptable, the owner(s) should be contacted to  
2 ascertain their willingness to work with the PWS. Once the owner agrees to  
3 participate in the program, questions should be asked about the wells. Many owners  
4 have more than one well, and would probably be the best source of information  
5 regarding the latest test dates, who tested the water, flowrates, and other well  
6 characteristics.
- 7 • After collecting as much information as possible from cooperative owners, the PWS  
8 would then narrow the selection of wells and sample and analyze them for quality.  
9 Wells with good quality water would then be potential candidates for test pumping.  
10 In some cases, a particular well may need to be refurbished before test pumping.  
11 Information obtained from test pumping would then be used in combination with  
12 information about the general characteristics of the aquifer to determine whether a  
13 well at that location would be suitable as a supply source.
- 14 • It is recommended that new wells be installed instead of using existing wells to  
15 ensure the well characteristics are known and the well meets construction standards.
- 16 • Permit(s) would then be obtained from the groundwater control district or other  
17 regulatory authority, and an agreement with the owner (purchase or lease, access  
18 easements, etc.) would then be negotiated.

#### 19 **1.4.2.2 Develop New Wells**

20 If no existing wells are available for development, the PWS or group of PWSs has an  
21 option of developing new wells. Records of existing wells, along with other hydrogeologic  
22 information and modern geophysical techniques, should be used to identify potential locations  
23 for new wells. In some areas, the TWDB's Groundwater Availability Model (GAM) may be  
24 applied to indicate potential sources. Once a general area is identified, land owners and  
25 regulatory agencies should be contacted to determine an exact location for a new well or well  
26 field. Pump tests and water quality tests would be required to determine if a new well will  
27 produce an adequate quantity of good quality water. Permits from the local groundwater  
28 control district or other regulatory authority could also be required for a new well.

#### 29 **1.4.3 Potential for Surface Water Sources**

30 Water rights law dominates the acquisition of water from surface water sources. For a  
31 PWS, 100 percent availability of water is required, except where a back-up source is available.  
32 For PWSs with an existing water source, although it may be non-compliant because of elevated  
33 concentrations of one or more parameters, water rights may not need to be 100 percent  
34 available.

##### 35 **1.4.3.1 Existing Surface Water Sources**

36 "Existing surface water sources" of water refers to municipal water authorities and cities  
37 that obtain water from surface water sources. The process of obtaining water from such a  
38 source is generally less time consuming and less costly than the process of developing a new

1 source; therefore, it should be a primary course of investigation. An existing source would be  
2 limited by its water rights, the safe yield of a reservoir or river, or by its water treatment or  
3 water conveyance capability. The source must be able to meet the current demand and honor  
4 contracts with communities it currently supplies. In many cases, the contract amounts reflect  
5 projected future water demand based on population or industrial growth.

6 A non-compliant PWS would look for a source with sufficient spare capacity. Where no  
7 such capacity exists, the non-compliant PWS could offer to fund the improvements necessary  
8 to obtain the capacity. This approach would work only where the safe yield could be increased  
9 (perhaps by enlarging a reservoir) or where treatment capacity could be increased. In some  
10 instances water rights, where they are available, could possibly be purchased.

11 In addition to securing the water supply from an existing source, the non-compliant PWS  
12 would need to arrange for transmission of the water to the PWS. In some cases, that could  
13 require negotiations with, contracts with, and payments to an intermediate PWS (an  
14 intermediate PWS is one where the infrastructure is used to transmit water from a “supplier”  
15 PWS to a “supplied” PWS, but does not provide any additional treatment to the supplied  
16 water). The non-compliant PWS could be faced with having to fund improvements to the  
17 intermediate PWS in addition to constructing its own necessary transmission facilities.

#### 18 **1.4.3.2 New Surface Water Sources**

19 Communication with the TCEQ and relevant planning groups from the beginning is  
20 essential in the process of obtaining a new surface water source. Preliminary assessment of the  
21 potential for acquiring new rights may be based on surface water availability maps located on  
22 the TWDB website. Where water rights appear to be available, the following activities need to  
23 occur:

- 24 • Discussions with TCEQ to indicate the likelihood of obtaining those rights. The  
25 TCEQ may use the Water Availability Model (WAM) to assist in the determination.
- 26 • Discussions with land owners to indicate potential treatment plant locations.
- 27 • Coordination with U.S. Army Corps of Engineers and local river authorities.
- 28 • Preliminary engineering design to determine the feasibility, costs, and  
29 environmental issues of a new treatment plant.

30 Should these discussions indicate that a new surface water source is the best option, the  
31 community would proceed with more intensive planning (initially obtaining funding),  
32 permitting, land acquisition, and detailed designs.

#### 33 **1.4.4 Identification of Treatment Technologies for Fluoride and Arsenic**

34 Various treatment technologies were also investigated as compliance alternatives for  
35 treatment of fluoride and arsenic to regulatory levels (*i.e.*, MCLs). Numerous options have  
36 been identified by the USEPA as best available technologies (BAT) for non-compliant

1 constituents. Identification and descriptions of the various BATs are provided in the following  
2 sections.

#### 3 **1.4.4.1 Treatment Technologies for Fluoride**

4 Fluoride is a soluble anion and is not removed by particle filtration. The secondary MCL  
5 for fluoride is 2 mg/L and the primary MCL is 4.0 mg/L. The USEPA BATs for fluoride  
6 removal include activated alumina adsorption and reverse osmosis (RO). Other treatment  
7 technologies that can potentially remove fluoride from water include lime softening (modified),  
8 alum coagulation, electrodialysis (ED or EDR), and anion exchange.

#### 9 **1.4.4.2 Treatment Technologies for Arsenic**

10 In January 2001, the USEPA published a final rule in the Federal Register that established  
11 an MCL for arsenic of 0.01 mg/L (USEPA 2008b). The regulation applies to all community  
12 water systems and non-transient, non-community water systems, regardless of size.

13 The new arsenic MCL of 0.01 mg/L became effective January 23, 2006, at which time the  
14 running average annual arsenic level would have to be at or below 0.01 mg/L at each entry  
15 point to the distribution system, although point-of-use (POU) treatment could be instituted in  
16 place of centralized treatment. All surface water systems had to complete initial monitoring for  
17 the new arsenic MCL or have a state-approved waiver by December 31, 2006. All groundwater  
18 systems are to have completed initial monitoring or have a state-approved waiver by December  
19 31, 2007.

20 Various treatment technologies were investigated as compliance alternatives for treatment  
21 of arsenic to regulatory levels (*i.e.*, MCL). According to a recent USEPA report for small  
22 water systems with less than 10,000 customers (EPA/600/R-05/001) a number of drinking  
23 water treatment technologies are available to reduce arsenic concentrations in source water to  
24 below the new MCL of 10 µg/L, including:

- 25 • Ion exchange (IX);
- 26 • Reverse osmosis (RO);
- 27 • Electrodialysis reversal (EDR);
- 28 • Adsorption; and
- 29 • Coagulation/filtration.

#### 30 **1.4.5 Description of Treatment Technologies**

31 RO, EDR, and adsorption are identified by USEPA as BATs for removal of both fluoride  
32 and arsenic. In this case, adsorption is not a feasible technology because of the high TDS and  
33 alkalinity of the groundwater. Also effectiveness of an adsorption media suitable for reduction  
34 of both fluoride and arsenic is relatively low and requires frequent replacement. RO is also a  
35 viable option for point of entry (POE) and POU systems. A description of these technologies  
36 follows.

### 1 1.4.5.1 Reverse Osmosis

2 Process. RO is a physical process in which contaminants are removed by applying  
3 pressure on the feed water to force it through a semi-permeable membrane. RO membranes  
4 reject ions based on size and electrical charge. The raw water is typically called feed; the  
5 product water is called permeate; and the concentrated reject is called concentrate. Common  
6 RO membrane materials include asymmetric cellulose acetate (CA) or polyamide thin film  
7 composite (TFC). The TFC membrane operates at much lower pressure and can achieve higher  
8 salt rejection than the CA membranes, but is less chlorine resistant. Each material has specific  
9 benefits and limitations depending on the raw water characteristics and pre-treatment. A  
10 newer, lower pressure type membrane, similar in operation to RO, is nanofiltration (NF), which  
11 has higher rejection for divalent ions than mono-valent ions. NF is sometimes used instead of  
12 RO for treating water with high hardness and sulfate concentrations. A typical RO installation  
13 includes a high pressure feed pump; parallel first and second stage membrane elements (in  
14 pressure vessels); and valves and piping for feed, permeate, and concentrate streams. Factors  
15 influencing membrane selection are cost, recovery, rejection, raw water characteristics, and  
16 pre-treatment. Factors influencing performance are raw water characteristics, pressure,  
17 temperature, and regular monitoring and maintenance. Depending on the membrane type and  
18 operating pressure, RO is capable of removing 85-95 percent of fluoride, and over 95 percent  
19 of nitrate and arsenic. The treatment process is relatively insensitive to pH. Water recovery is  
20 60-80 percent, depending on raw water characteristics. The concentrate volume for disposal  
21 can be significant. The conventional RO treatment train for well water uses anti-scalant  
22 addition, cartridge filtration, RO membranes, chlorine disinfection, and clearwell storage.

23 Pre-treatment. RO requires careful review of raw water characteristics, and pre-treatment  
24 needs to prevent membranes from fouling, scaling, or other membrane degradation. Removal  
25 or sequestering of suspended solids is necessary to prevent colloidal and bio-fouling, and  
26 removal of sparingly soluble constituents such as calcium, magnesium, silica, sulfate, barium,  
27 *etc.*, may be required to prevent scaling. Pretreatment can include media filters to remove  
28 suspended particles; IX softening to remove hardness; antiscalant feed; temperature and pH  
29 adjustment to maintain efficiency; acid to prevent scaling and membrane damage; activated  
30 carbon or bisulfite to remove chlorine (post-disinfection may be required); and cartridge filters  
31 to remove any remaining suspended particles to protect membranes from upsets.

32 Maintenance. Rejection percentages must be monitored to ensure contaminant removal  
33 below MCLs. Regular monitoring of membrane performance is necessary to determine  
34 fouling, scaling, or other membrane degradation. Use of monitoring equipment to track  
35 membrane performance is recommended. Acidic or caustic solutions are regularly flushed  
36 through the system at high volume/low pressure with a cleaning agent to remove fouling and  
37 scaling. The system is flushed and returned to service. RO stages are cleaned sequentially.  
38 Frequency of membrane replacement is dependent on raw water characteristics, pre-treatment,  
39 and maintenance.

1        Waste Disposal. Pre-treatment waste streams, concentrate flows, and spent filters and  
2 membrane elements all require approved disposal methods. Disposal of the significant volume  
3 of the concentrate stream is a problem for many utilities.

#### 4        **Advantages (RO)**

- 5            • Produces the highest water quality.
- 6            • Can effectively treat a wide range of dissolved salts and minerals, turbidity, health  
7            and aesthetic contaminants, and certain organics. Some highly maintained units are  
8            capable of treating biological contaminants.
- 9            • Low pressure - less than 100 pounds per square inch, compact, self-contained,  
10           single membrane units are available for small installations.

#### 11       **Disadvantages (RO)**

- 12           • Relatively expensive to install and operate.
- 13           • Frequent membrane monitoring and maintenance; pressure, temperature, and pH  
14           requirements to meet membrane tolerances. Membranes can be chemically  
15           sensitive.
- 16           • Additional water usage depending on rejection rate.
- 17           • Concentrate disposal required.

18        A concern with RO for treatment of inorganics is that if the full stream is treated, then  
19 most of the alkalinity and hardness would also be removed. In that event, post-treatment may  
20 be necessary to avoid corrosion problems. If feasible, a way to avoid this issue is to treat a slip  
21 stream of raw water and blend the slip stream back with the raw water rather than treat the full  
22 stream. The amount of water rejected is also an issue with RO. Discharge concentrate flow  
23 can be between 10 and 50 percent of the influent flow.

#### 24       **1.4.5.2 Electrodialysis Reversal**

25        Process. EDR is an electrochemical process in which ions migrate through ion-selective  
26 semi-permeable membranes as a result of their attraction to two electrically charged electrodes.  
27 A typical EDR system includes a membrane stack with a number of cell pairs, each consisting  
28 of a cation transfer membrane, a demineralized flow spacer, an anion transfer membrane, and a  
29 concentrate flow spacer. Electrode compartments are at opposite ends of the stack. The  
30 influent feed water (chemically treated to prevent precipitation) and the concentrated reject  
31 flow in parallel across the membranes and through the demineralized and concentrate flow  
32 spacers, respectively. The electrodes are continually flushed to reduce fouling or scaling.  
33 Careful consideration of flush feed water is required. Typically, the membranes are cation or  
34 anion exchange resins cast in sheet form; the spacers are high density polyethylene; and the  
35 electrodes are inert metal. EDR stacks are tank-contained and often staged. Membrane  
36 selection is based on review of raw water characteristics. A single-stage EDR system usually  
37 removes 40-50 percent of fluoride, nitrate, arsenic, and total dissolved solids (TDS).  
38 Additional stages are required to achieve higher removal efficiency (85-95% for fluoride).

1 EDR uses the technique of regularly reversing the polarity of the electrodes, thereby freeing  
2 accumulated ions on the membrane surface. This process requires additional plumbing and  
3 electrical controls, but it increases membrane life, may require less added chemicals, and eases  
4 cleaning. The conventional EDR treatment train typically includes EDR membranes, chlorine  
5 disinfection, and clearwell storage. Treatment of surface water may also require pre-treatment  
6 steps such as raw water pumps, debris screens, rapid mix with addition of an anti-scalant, slow  
7 mix flocculator, sedimentation basin or clarifier, and gravity filters. Microfiltration could be  
8 used in place of flocculation, sedimentation, and filtration. Additional treatment or  
9 management of the concentrate and the removed solids would be necessary prior to disposal.

10 Pre-treatment. There are pretreatment requirements for pH, organics, turbidity, and other  
11 raw water characteristics. EDR typically requires chemical feed to prevent scaling, acid  
12 addition for pH adjustment, and a cartridge filter for prefiltration. If arsenite [As(III)] occurs,  
13 oxidation via pre-chlorination is required since the arsenite specie at pH below 9 has no ionic  
14 charge and will not be removed by EDR.

15 Maintenance. EDR membranes are durable, can tolerate a pH range from 1 to 10, and  
16 temperatures to 115 degrees Fahrenheit (°F) for cleaning. They can be removed from the unit  
17 and scrubbed. Solids can be washed off by turning the power off and letting water circulate  
18 through the stack. Electrode washes flush out byproducts of electrode reaction. The  
19 byproducts are hydrogen, formed in the cathode space, and oxygen and chlorine gas, formed in  
20 the anode space. If the chlorine is not removed, toxic chlorine gas may form. Depending on  
21 raw water characteristics, the membranes would require regular maintenance or replacement.  
22 EDR requires reversing the polarity. Flushing at high volume/low pressure continuously is  
23 required to clean electrodes. If used, pre-treatment filter replacement and backwashing would  
24 be required. The EDR stack must be disassembled, mechanically cleaned, and reassembled at  
25 regular intervals.

26 Waste Disposal. Highly concentrated reject flows, electrode cleaning flows, and spent  
27 membranes require approved disposal methods. Pre-treatment processes and spent materials  
28 also require approved disposal methods.

### 29 **Advantages (EDR)**

- 30 • EDR can operate with minimal fouling or scaling, or chemical addition.
- 31 • Low pressure requirements; typically quieter than RO.
- 32 • Long membrane life expectancy; EDR extends membrane life and reduces  
33 maintenance.
- 34 • More flexible than RO in tailoring treated water quality requirements.

### 35 **Disadvantages (EDR)**

- 36 • Not suitable for high levels of iron, manganese, and hydrogen sulfide.
- 37 • High energy usage at higher TDS water.

- 1 • Waste of water because of the significant concentrate flows.
- 2 • Generates relatively large saline waste stream requiring disposal.
- 3 • Pre-oxidation required for arsenite (if present).

4 EDR can be quite expensive to run because of the energy it uses. However, because it is  
5 generally automated and allows for part-time operation, it may be an appropriate technology  
6 for small systems. It can be used to simultaneously reduce fluoride, selenium, nitrate, arsenic,  
7 and TDS.

#### 8 **1.4.6 Point-of-Entry and Point-of-Use Treatment Systems**

9 Point-of-entry (POE) and POU treatment devices or systems rely on many of the same  
10 treatment technologies used in central treatment plants. However, while central treatment  
11 plants treat all water distributed to consumers to the same level, POU and POE treatment  
12 devices are designed to treat only a portion of the total flow. POU devices treat only the water  
13 intended for direct consumption, typically at a single tap or limited number of taps, while POE  
14 treatment devices are typically installed to treat all water entering a single home, business,  
15 school, or facility. POU and POE treatment systems may be an option for PWSs where central  
16 treatment is not affordable. Updated USEPA guidance on use of POU and POE treatment  
17 devices is provided in “*Point-of-Use or Point-of-Entry Treatment Options for Small Drinking*  
18 *Water Systems*,” EPA 815-R-06-010, April 2006 (USEPA 2006).

19 Point-of-entry and POU treatment systems can be used to provide compliant drinking  
20 water. These systems typically use small adsorption or reverse osmosis treatment units  
21 installed “under the sink” in the case of POU, and where water enters a house or building in the  
22 case of POE. It should be noted that the POU treatment units would need to be more complex  
23 than units typically found in commercial retail outlets to meet regulatory requirements, making  
24 purchase and installation more expensive. Point-of-entry and POU treatment units would be  
25 purchased and owned by the PWS. These solutions are decentralized in nature, and require  
26 utility personnel entry into houses or at least onto private property for installation,  
27 maintenance, and testing. Due to the large number of treatment units that would be employed  
28 and would be largely out of the control of the PWS, it is very difficult to ensure 100 percent  
29 compliance. Prior to selection of a POE or POU program for implementation, consultation  
30 with TCEQ would be required to address measurement and determination of level of  
31 compliance.

32 The National Primary Drinking Water Regulations (NPDWR), 40 CFR Section 141.100,  
33 covers criteria and procedures for PWSs using POE devices and sets limits on the use of these  
34 devices. According to the regulations (July 2005 Edition), the PWS must develop and obtain  
35 TCEQ approval for a monitoring plan before POE devices are installed for compliance with an  
36 MCL. Under the plan, POE devices must provide health protection equivalent to central water  
37 treatment meaning the water must meet all NPDWR and would be of acceptable quality similar  
38 to water distributed by a well-operated central treatment plant. In addition, monitoring must  
39 include physical measurements and observations such as total flow treated and mechanical  
40 condition of the treatment equipment. The system would have to track the POE flow for a

1 given time period, such as monthly, and maintain records of device inspection. The monitoring  
2 plan should include frequency of monitoring for the contaminant of concern and number of  
3 units to be monitored. For instance, the system may propose to monitor every POE device  
4 during the first year for the contaminant of concern and then monitor one-third of the units  
5 annually, each on a rotating schedule, such that each unit would be monitored every three  
6 years. To satisfy the requirement that POE devices must provide health protection, the water  
7 system may be required to conduct a pilot study to verify the POE device can provide treatment  
8 equivalent to central treatment. Every building connected to the system must have a POE  
9 device installed, maintained, and properly monitored. Additionally, TCEQ must be assured  
10 that every building is subject to treatment and monitoring, and that the rights and  
11 responsibilities of the PWS customer convey with title upon sale of property.

12 Effective technology for POE devices must be properly applied under the monitoring plan  
13 approved by TCEQ and the microbiological safety of the water must be maintained. TCEQ  
14 requires adequate certification of performance, field testing, and, if not included in the  
15 certification process, a rigorous engineering design review of the POE devices. The design and  
16 application of the POE devices must consider the tendency for increase in heterotrophic  
17 bacteria concentrations in water treated with activated carbon. It may be necessary to use  
18 frequent backwashing, post-contactor disinfection, and Heterotrophic Plate Count monitoring  
19 to ensure that the microbiological safety of the water is not compromised.

20 The SDWA [§1412(b)(4)(E)(ii)] regulates the design, management and operation of POU  
21 and POE treatment units used to achieve compliance with an MCL. These restrictions, relevant  
22 to MCL compliance are:

- 23 • POU and POE treatment units must be owned, controlled, and maintained by the  
24 water system, although the utility may hire a contractor to ensure proper operation  
25 and maintenance (O&M) and MCL compliance. The water system must retain unit  
26 ownership and oversight of unit installation, maintenance and sampling; the utility  
27 ultimately is the responsible party for regulatory compliance. The water system  
28 staff need not perform all installation, maintenance, or management functions, as  
29 these tasks may be contracted to a third party-but the final responsibility for the  
30 quality and quantity of the water supplied to the community resides with the water  
31 system, and the utility must monitor all contractors closely. Responsibility for  
32 O&M of POU or POE devices installed for SDWA compliance may not be  
33 delegated to homeowners.
- 34 • POU and POE units must have mechanical warning systems to automatically notify  
35 customers of operational problems. Each POU or POE treatment device must be  
36 equipped with a warning device (e.g., alarm, light) that would alert users when their  
37 unit is no longer adequately treating their water. As an alternative, units may be  
38 equipped with an automatic shut-off mechanism to meet this requirement.
- 39 • If the American National Standards Institute (ANSI) issued product standards for a  
40 specific type of POU or POE treatment unit, only those units that have been

1 independently certified according to those standards may be used as part of a  
2 compliance strategy.

3 The following observations with regard to using POE and POU devices for SDWA  
4 compliance were made by Raucher, *et al.* (2004):

- 5 • If POU devices are used as an SDWA compliance strategy, certain consumer  
6 behavioral changes will be necessary (e.g., encouraging people to drink water only  
7 from certain treated taps) to ensure comprehensive consumer health protection.
- 8 • Although not explicitly prohibited in the SDWA, USEPA indicates that POU  
9 treatment devices should not be used to treat for radon or for most volatile organic  
10 contaminants (VOC) to achieve compliance, because POU devices do not provide  
11 100 percent protection against inhalation or contact exposure to those contaminants  
12 at untreated taps (e.g., shower heads).
- 13 • Liability – PWSs considering unconventional treatment options (POU, POE, or  
14 bottled water) must address liability issues. These could be meeting drinking water  
15 standards, property entry and ensuing liabilities, and damage arising from improper  
16 installation or improper function of the POU and POE devices.

#### 17 **1.4.7 Water Delivery or Central Drinking Water Dispensers**

18 Current USEPA regulations 40 Code of Federal Regulations (CFR) 141.101 prohibit the  
19 use of bottled water to achieve compliance with an MCL, except on a temporary basis. State  
20 regulations do not directly address the use of bottled water. Use of bottled water at a non-  
21 compliant PWS would be on a temporary basis. Every 3 years, the PWSs that employ interim  
22 measures are required to present the TCEQ with estimates of costs for piping compliant water  
23 to their systems. As long as the projected costs remain prohibitively high, the bottled water  
24 interim measure is extended. Until USEPA amends the noted regulation, the TCEQ is unable  
25 to accept water delivery or central drinking water dispensers as compliance solutions.

26 Central provision of compliant drinking water would consist of having one or more  
27 dispensers of compliant water where customers could come to fill containers with drinking  
28 water. The centralized water source could be from small to medium-sized treatment units or  
29 could be compliant water delivered to the central point by truck.

30 Water delivery is an interim measure for providing compliant water. As an interim  
31 measure for a small impacted population, providing delivered drinking water may be cost  
32 effective. If the susceptible population is large, the cost of water delivery would increase  
33 significantly.

- 34 • Water delivery programs require consumer participation to a varying degree.  
35 Ideally, consumers would have to do no more than they currently do for a piped-  
36 water delivery system. Least desirable are those systems that require maximum  
37 effort on the part of the customer (e.g., customer has to travel to get the water,  
38 transport the water, and physically handle the bottles).

## SECTION 2 EVALUATION METHOD

### 2.1 DECISION TREE

The decision tree is a flow chart for conducting feasibility studies for a non-compliant PWS. The decision tree is shown in Figures 2.1 through 2.4. The tree guides the user through a series of phases in the design process. Figure 2.1 shows Tree 1, which outlines the process for defining the existing system parameters, followed by optimizing the existing treatment system operation. If optimizing the existing system does not correct the deficiency, the tree leads to six alternative preliminary branches for investigation. The groundwater branch leads through investigating existing wells to developing a new well field. The treatment alternatives address centralized and on-site treatment. The objective of this phase is to develop conceptual designs and cost estimates for the six types of alternatives. The work done for this report follows through Tree 1 and Tree 2, as well as a preliminary pass through Tree 4.

Tree 3, which begins at the conclusion of the work for this report, starts with a comparison of the conceptual designs, selecting the two or three alternatives that appear to be most promising, and eliminating those alternatives that are obviously infeasible. It is envisaged that a process similar to this would be used by the study PWS to refine the list of viable alternatives. The selected alternatives are then subjected to intensive investigation, and highlighted by an investigation into the socio-political aspects of implementation. Designs are further refined and compared, resulting in the selection of a preferred alternative. The steps for assessing the financial and economic aspects of the alternatives (one of the steps in Tree 3) are given in Tree 4 in Figure 2.4.

### 2.2 DATA SOURCES AND DATA COLLECTION

#### 2.2.1 Data Search

##### 2.2.1.1 Water Supply Systems

The TCEQ maintains a set of files on public water systems, utilities, and districts at its headquarters in Austin, Texas. The files are organized under two identifiers: a PWS identification number and a CCN number. The PWS identification number is used to retrieve four types of files:

- CO – Correspondence,
- CA – Chemical analysis,
- MOR – Monthly operating reports (quality/quantity), and
- FMT – Financial, managerial and technical issues.

Figure 2.1  
TREE 1 – EXISTING FACILITY ANALYSIS

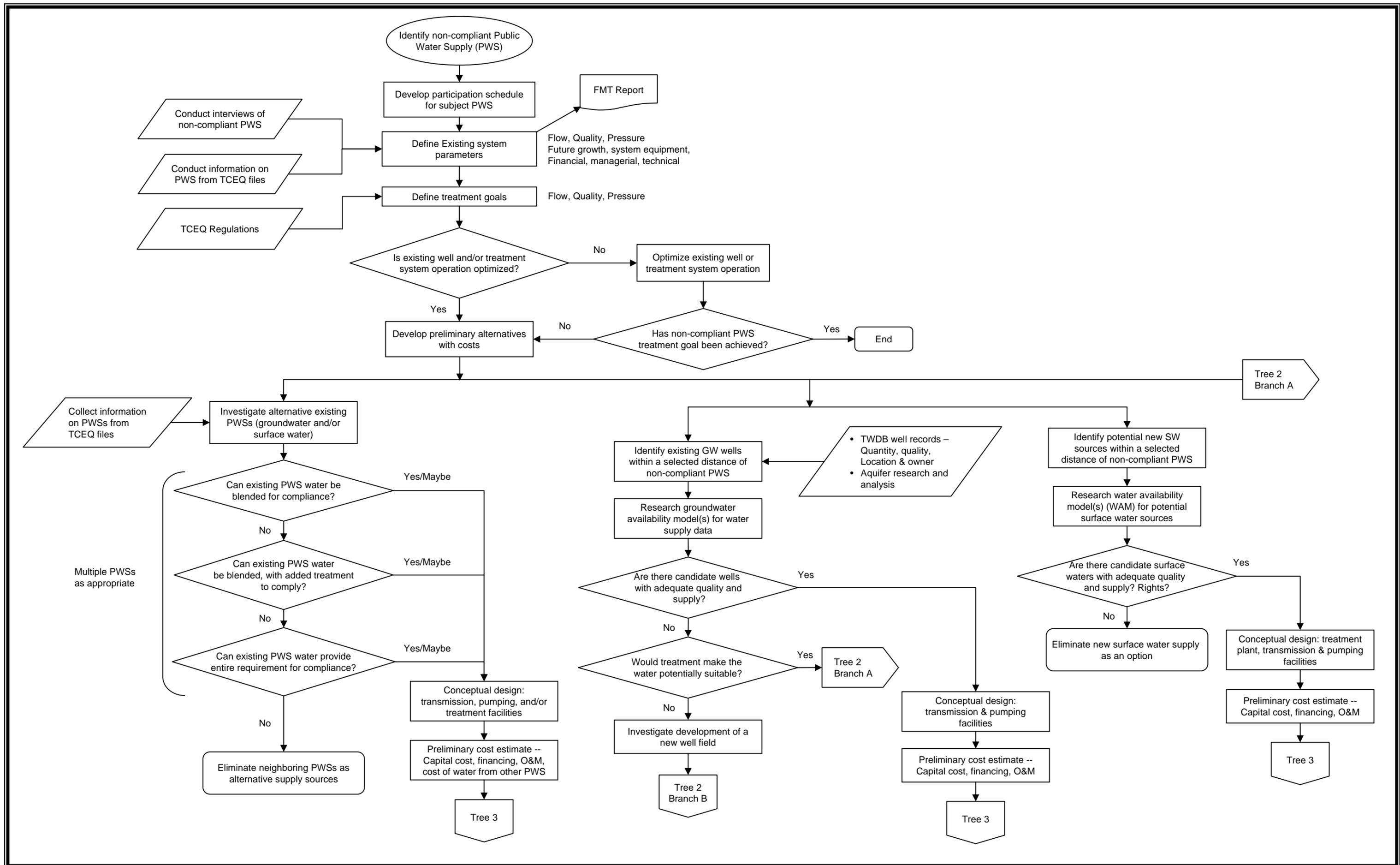


Figure 2.2  
TREE 2 – DEVELOP TREATMENT ALTERNATIVES

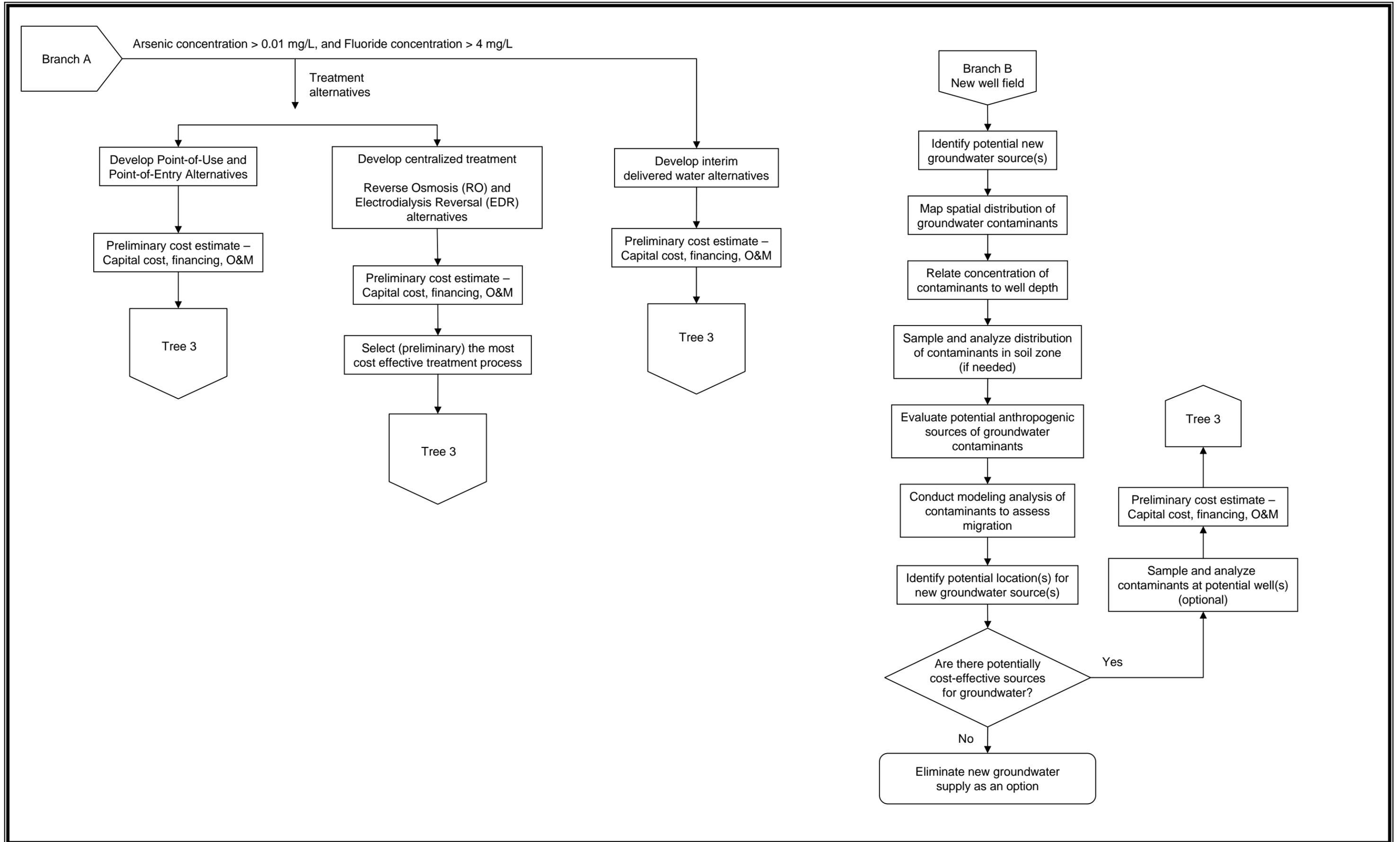
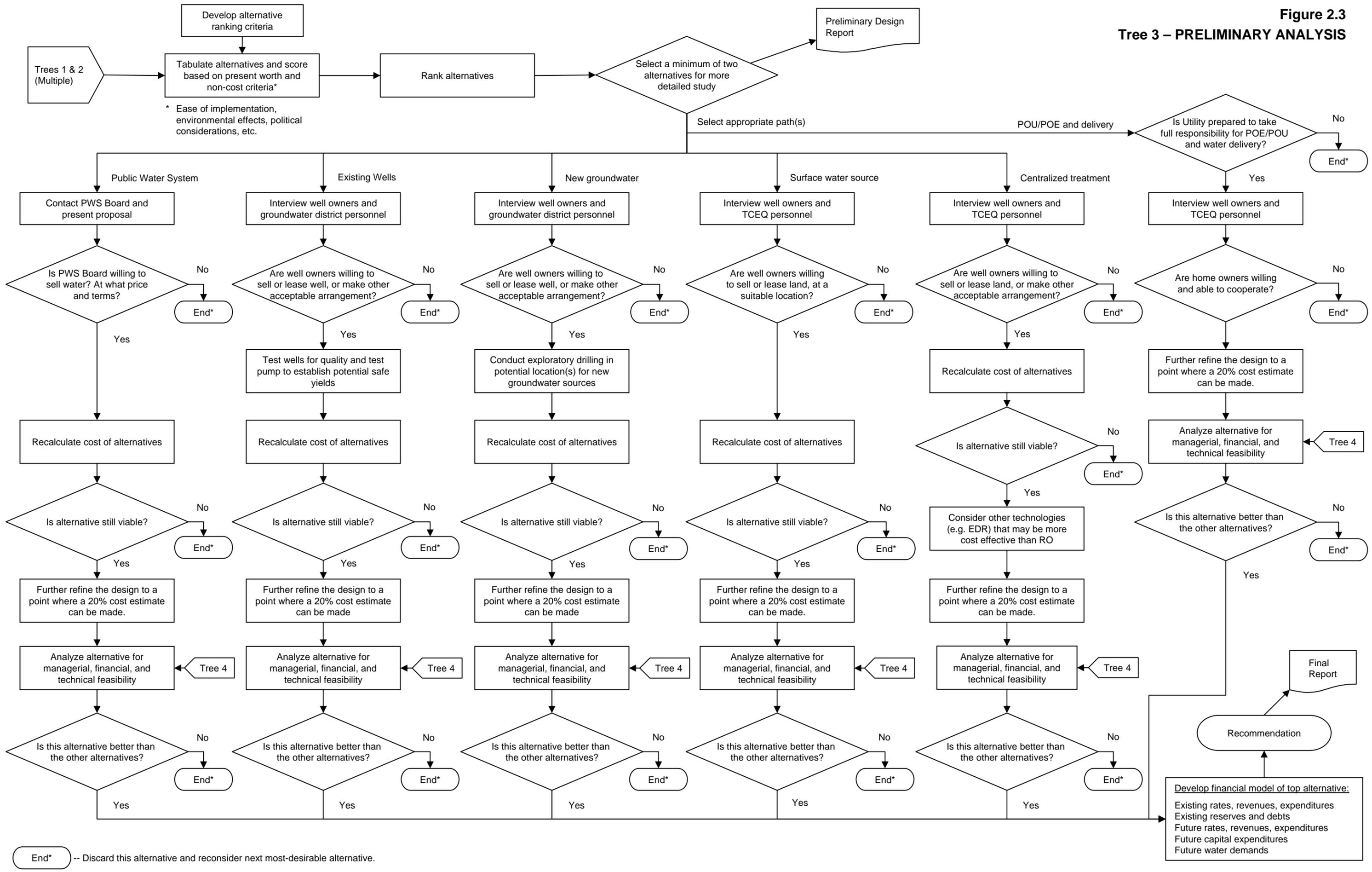


Figure 2.3

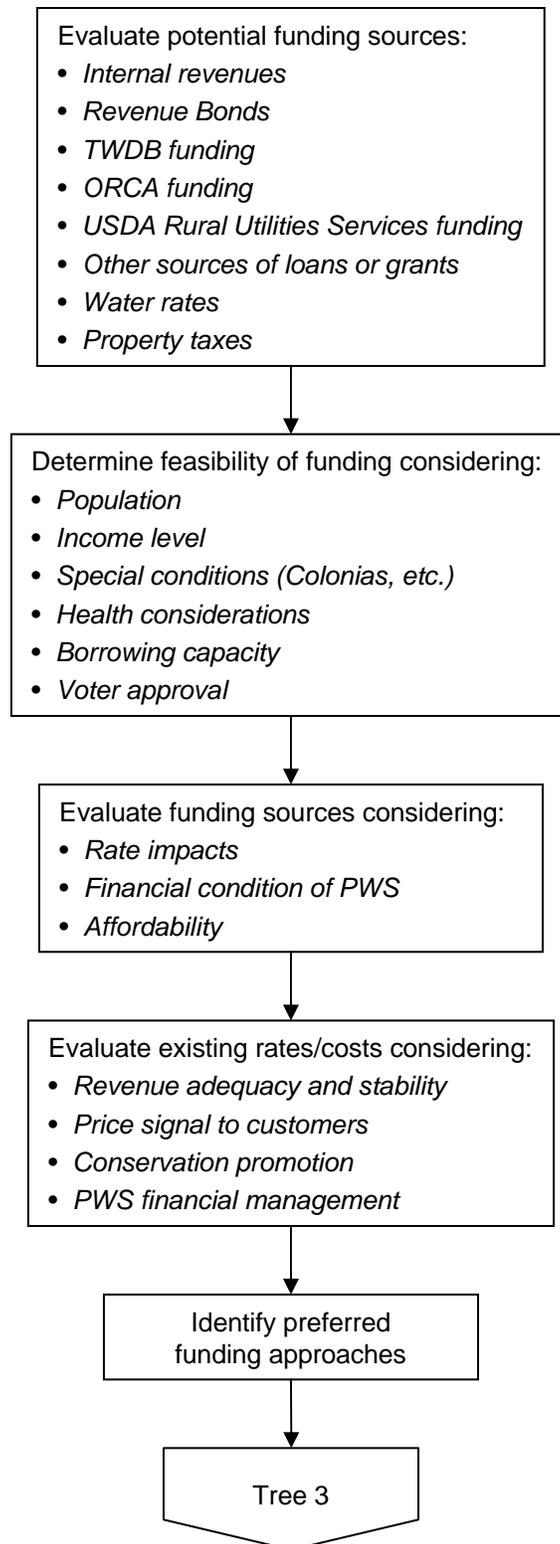
Tree 3 – PRELIMINARY ANALYSIS



End\* -- Discard this alternative and reconsider next most-desirable alternative.

Develop financial model of top alternative:  
 Existing rates, revenues, expenditures  
 Existing reserves and debts  
 Future rates, revenues, expenditures  
 Future capital expenditures  
 Future water demands

**Figure 2.4**  
**TREE 4 – FINANCIAL**



1 The CCN files generally contain a copy of the system’s Certificate of Convenience and  
2 Necessity, along with maps and other technical data.

3 These files were reviewed for the PWS and surrounding systems.

4 The following websites were consulted to identify the water supply systems in the area:

- 5 • Texas Commission on Environmental Quality  
6 [www3.tceq.state.tx.us/iwud/](http://www3.tceq.state.tx.us/iwud/).
- 7 • USEPA Safe Drinking Water Information System  
8 [www.epa.gov/safewater/data/getdata.html](http://www.epa.gov/safewater/data/getdata.html)

9 Groundwater Control Districts were identified on the TWDB web site, which has a series  
10 of maps covering various groundwater and surface water subjects. One of those maps shows  
11 groundwater control districts in the State of Texas.

### 12 **2.2.1.2 Existing Wells**

13 The TWDB maintains a groundwater database available at [www.twdb.state.tx.us](http://www.twdb.state.tx.us) that has  
14 two tables with helpful information. The “Well Data Table” provides a physical description of  
15 the well, owner, location in terms of latitude and longitude, current use, and for some wells,  
16 items such as flowrate, and nature of the surrounding formation. The “Water Quality Table”  
17 provides information on the aquifer and the various chemical concentrations in the water.

### 18 **2.2.1.3 Surface Water Sources**

19 Regional planning documents were consulted for lists of surface water sources.

### 20 **2.2.1.4 Groundwater Availability Model**

21 GAMs, developed by the TWDB, are planning tools and should be consulted as part of a  
22 search for new or supplementary water sources. The GAM for the Ogallala Aquifer was  
23 investigated as a potential tool for identifying available and suitable groundwater resources.

### 24 **2.2.1.5 Water Availability Model**

25 The WAM is a computer-based simulation predicting the amount of water that would be in  
26 a river or stream under a specified set of conditions. WAMs are used to determine whether  
27 water would be available for a newly requested water right or amendment. If water is  
28 available, these models estimate how often the applicant could count on water under various  
29 conditions (e.g., whether water would be available only one month out of the year, half the  
30 year, or all year, and whether that water would be available in a repeat of the drought of  
31 record).

32 WAMs provide information that assist TCEQ staff in determining whether to recommend  
33 the granting or denial of an application.

### 1 **2.2.1.6 Financial Data**

2 An evaluation of existing data will yield an up-to-date assessment of the financial  
3 condition of the water system. As part of a site visit, financial data were collected in various  
4 forms such as electronic files, hard copy documents, and focused interviews. Data sought  
5 included:

- 6 • Annual Budget
- 7 • Audited Financial Statements
  - 8 ○ Balance Sheet
  - 9 ○ Income & Expense Statement
  - 10 ○ Cash Flow Statement
  - 11 ○ Debt Schedule
- 12 • Water Rate Structure
- 13 • Water Use Data
  - 14 ○ Production
  - 15 ○ Billing
  - 16 ○ Customer Counts

### 17 **2.2.1.7 Demographic Data**

18 Basic demographic data were collected from the 2000 Census to establish incomes and  
19 eligibility for potential low cost funding for capital improvements. Median household income  
20 (MHI) and number of families below poverty level were the primary data points of  
21 significance. If available, MHI for the customers of the PWS should be used. In addition,  
22 unemployment data were collected from current U.S. Bureau of Labor Statistics. These data  
23 were collected for the following levels: national, state, and county.

## 24 **2.2.2 PWS Interviews**

### 25 **2.2.2.1 PWS Capacity Assessment Process**

26 Capacity assessment is the industry standard term for evaluation of a water system's FMT  
27 capacity to effectively deliver safe drinking water to its customers now and in the future at a  
28 reasonable cost, and to achieve, maintain and plan for compliance with applicable regulations.  
29 The assessment process involves interviews with staff and management who have a  
30 responsibility in the operations and management of the system.

31 Financial, managerial, and technical capacity are individual yet highly interrelated  
32 components of a system's capacity. A system cannot sustain capacity without maintaining  
33 adequate capability in all three components.

1        **Financial capacity** is a water system’s ability to acquire and manage sufficient financial  
2 resources to allow the system to achieve and maintain compliance with SDWA regulations.  
3 Financial capacity refers to the financial resources of the water system, including but not  
4 limited to, revenue sufficiency, credit worthiness, and fiscal controls.

5        **Managerial capacity** is the ability of a water system to conduct its affairs so the system is  
6 able to achieve and maintain compliance with SDWA requirements. Managerial capacity  
7 refers to the management structure of the water system, including but not limited to, ownership  
8 accountability, staffing and organization, and effective relationships with customers and  
9 regulatory agencies.

10       **Technical capacity** is the physical and operational ability of a water system to achieve and  
11 maintain compliance with SDWA regulations. It refers to the physical infrastructure of the  
12 water system, including the adequacy of the source water, treatment, storage and distribution  
13 infrastructure. It also refers to the ability of system personnel to effectively operate and  
14 maintain the system and to otherwise implement essential technical knowledge.

15       Many aspects of water system operations involve more than one component of capacity.  
16 Infrastructure replacement or improvement, for example, requires financial resources,  
17 management planning and oversight, and technical knowledge. A deficiency in any one area  
18 could disrupt the entire operation. A system that is able to meet both its immediate and long-  
19 term challenges demonstrates that it has sufficient FMT capacity.

20       Assessment of FMT capacity of the PWS was based on an approach developed by the New  
21 Mexico Environmental Finance Center (NMEFC), which is consistent with the TCEQ FMT  
22 assessment process. This method was developed from work the NMEFC did while assisting  
23 USEPA Region 6 in developing and piloting groundwater comprehensive performance  
24 evaluations. The NMEFC developed a standard list of questions that could be asked of water  
25 system personnel. The list was then tailored slightly to have two sets of questions – one for  
26 managerial and financial personnel, and one for operations personnel (the questions are  
27 included in Appendix A). Each person with a role in the FMT capacity of the system was  
28 asked the applicable standard set of questions individually. The interviewees were not given  
29 the questions in advance and were not told the answers others provided. Also, most of the  
30 questions are open ended type questions so they were not asked in a fashion to indicate what  
31 would be the “right” or “wrong” answer. The interviews lasted between 45 minutes to  
32 75 minutes depending on the individual’s role in the system and the length of the individual’s  
33 answers.

34       In addition to the interview process, visual observations of the physical components of the  
35 system were made. A technical information form was created to capture this information. This  
36 form is also contained in Appendix A. This information was considered supplemental to the  
37 interviews because it served as a check on information provided in the interviews. For  
38 example, if an interviewee stated he or she had an excellent preventative maintenance schedule  
39 and the visit to the facility indicated a significant amount of deterioration (more than would be  
40 expected for the age of the facility) then the preventative maintenance program could be further

1 investigated or the assessor could decide that the preventative maintenance program was  
2 inadequate.

3       Following interviews and observations of the facility, answers that all personnel provided  
4 were compared and contrasted to provide a clearer picture of the true operations at the water  
5 system. The intent was to go beyond simply asking the question, “Do you have a budget?” to  
6 actually finding out if the budget was developed and being used appropriately. For example, if  
7 a water system manager was asked the question, “Do you have a budget?” he or she may say,  
8 “yes” and the capacity assessor would be left with the impression that the system is doing well  
9 in this area. However, if several different people are asked about the budget in more detail, the  
10 assessor may find that although a budget is present, operations personnel do not have input into  
11 the budget, the budget is not used by the financial personnel, the budget is not updated  
12 regularly, or the budget is not used in setting or evaluating rates. With this approach, the  
13 inadequacy of the budget would be discovered and the capacity deficiency in this area would be  
14 noted.

15       Following the comparison of answers, the next step was to determine which items noted as  
16 a potential deficiency truly had a negative effect on the system’s operations. If a system had  
17 what appeared to be a deficiency, but this deficiency was not creating a problem in terms of the  
18 operations or management of the system, it was not considered critical and may not have  
19 needed to be addressed as a high priority. As an example, the assessment may have revealed an  
20 insufficient number of staff members to operate the facility. However, it may also have been  
21 revealed that the system was able to work around that problem by receiving assistance from a  
22 neighboring system, so no severe problems resulted from the number of staff members.  
23 Although staffing may not be ideal, the system does not need to focus on this particular issue.  
24 The system needs to focus on items that are truly affecting operations. As an example of this  
25 type of deficiency, a system may lack a reserve account which can then lead the system to  
26 delay much-needed maintenance or repair on its storage tank. In this case, the system needs to  
27 address the reserve account issue so that proper maintenance can be completed.

28       The intent was to develop a list of capacity deficiencies with the greatest impact on the  
29 system’s overall capacity. Those were the most critical items to address through follow-up  
30 technical assistance or by the system itself.

### 31 **2.2.2.2 Interview Process**

32       PWS personnel were interviewed by the project team, and each was interviewed  
33 separately. Interview forms were completed during each interview.

## 34 **2.3 ALTERNATIVE DEVELOPMENT AND ANALYSIS**

35       The initial objective for developing alternatives to address compliance issues is to identify  
36 a comprehensive range of possible options that can be evaluated to determine the most  
37 promising for implementation. Once the possible alternatives are identified, they must be  
38 defined in sufficient detail so a conceptual cost estimate (capital and O&M costs) can be  
39 developed. These conceptual cost estimates are used to compare the affordability of

1 compliance alternatives, and to give a preliminary indication of rate impacts. Consequently,  
2 these costs are pre-planning level and should not be viewed as final estimated costs for  
3 alternative implementation. The basis for the unit costs used for the compliance alternative  
4 cost estimates is summarized in Appendix B. Other non-economic factors for the alternatives,  
5 such as reliability and ease of implementation, are also addressed

### 6 **2.3.1 Existing PWS**

7 The neighboring PWSs were identified, and the extents of their systems were investigated.  
8 PWSs farther than 10 miles from the non-compliant PWSs were not considered because the  
9 length of the pipeline required would make the alternative cost prohibitive. The quality of  
10 water provided was also investigated. For neighboring PWSs with compliant water, options for  
11 water purchase and/or expansion of existing well fields were considered. The neighboring  
12 PWSs with non-compliant water were considered as possible partners in sharing the cost for  
13 obtaining compliant water either through treatment or developing an alternate source.

14 The neighboring PWSs were investigated to get an idea of the water sources in use and the  
15 quantity of water that might be available for sale. They were contacted to identify key  
16 locations in their systems where a connection might be made to obtain water, and to explore on  
17 a preliminary basis their willingness to partner or sell water. Then, the major system  
18 components that would be required to provide compliant water were identified. The major  
19 system components included treatment units, wells, storage tanks, pump stations, and pipelines.

20 Once the major components were identified, a preliminary design was developed to  
21 identify sizing requirements and routings. A capital cost estimate was then developed based on  
22 the preliminary design of the required system components. An annual O&M cost was also  
23 estimated to reflect the change in O&M expenditures that would be needed if the alternative  
24 was implemented.

25 Non-economic factors were also identified. Ease of implementation was considered, as  
26 well as the reliability for providing adequate quantities of compliant water. Additional factors  
27 were whether implementation of an alternative would require significant increase in the  
28 management or technical capability of the PWS, and whether the alternative had the potential  
29 for regionalization.

### 30 **2.3.2 New Groundwater Source**

31 It was not possible in the scope of this project to determine conclusively whether new  
32 wells could be installed to provide compliant drinking water. To evaluate potential new  
33 groundwater source alternatives, three test cases were developed based on distance from the  
34 PWS intake point. The test cases were based on distances of 10 miles, 5 miles, and 1 mile. It  
35 was assumed that a pipeline would be required for all three test cases, and a storage tank and  
36 pump station would be required for the 10-mile and 5-mile alternatives. It was also assumed  
37 that new wells would be installed, and that their depths would be similar to the depths of the  
38 existing wells, or other existing drinking water wells in the area.

1 A preliminary design was developed to identify sizing requirements for the required  
2 system components. A capital cost estimate was then developed based on the preliminary  
3 design of the required system components. An annual O&M cost was also estimated to reflect  
4 the change (*i.e.*, from current expenditures) in O&M expenditures that would be needed if the  
5 alternative was implemented.

6 Non-economic factors were also identified. Ease of implementation was considered, as  
7 well as the reliability for providing adequate quantities of compliant water. Additional factors  
8 were whether implementation of an alternative would require significant increase in the  
9 management or technical capability of the PWS, and whether the alternative had the potential  
10 for regionalization.

### 11 **2.3.3 New Surface Water Source**

12 New surface water sources were investigated. Availability of adequate quality water was  
13 investigated for the main rivers in the area, as well as the major reservoirs. TCEQ WAMs were  
14 inspected, and the WAM was run, where appropriate.

### 15 **2.3.4 Treatment**

16 The only common treatment technologies considered potentially applicable for removal of  
17 fluoride and arsenic are RO and EDR. RO and EDR can remove fluoride as well as arsenic,  
18 selenium, nitrate, TDS and other dissolved constituents. RO treatment is considered for central  
19 treatment alternatives, as well as POU and POE alternatives. EDR is considered for central  
20 treatment only. Both RO and EDR treatment produce a liquid waste: a reject stream from RO  
21 treatment and a concentrate stream from EDR treatment. As a result, the treated volume of  
22 water is less than the volume of raw water that enters the treatment system. The amount of raw  
23 water used increases to produce the same amount of treated water if RO or EDR treatment is  
24 implemented. Partial RO treatment and blending treated and untreated water to meet the  
25 fluoride MCL would reduce the amount of raw water used. The EDR operation can be tailored  
26 to provide a desired fluoride effluent concentration by controlling the electrical energy applied.  
27 The treatment units were sized based on flow rates, and capital and annual O&M cost estimates  
28 were made based on the size of the treatment equipment required and the average water  
29 consumption rate, respectively. Neighboring non-compliant PWSs were identified to look for  
30 opportunities where the costs and benefits of central treatment could be shared between  
31 systems.

32 Non-economic factors were also identified. Ease of implementation was considered, as  
33 well as reliability for providing adequate quantities of compliant water. Additional factors  
34 were whether implementation of an alternative would require significant increase in the  
35 management or technical capability of the PWS, and whether the alternative had the potential  
36 for regionalization.

## 1    **2.4    COST OF SERVICE AND FUNDING ANALYSIS**

2       The primary purpose of the cost of service and funding analysis is to determine the  
3   financial impact of implementing compliance alternatives, primarily by examining the required  
4   rate increases, and also the fraction of household income that water bills represent. The current  
5   financial situation is also reviewed to determine what rate increases are necessary for the PWS  
6   to achieve or maintain financial viability.

### 7    **2.4.1   Financial Feasibility**

8       A key financial metric is the comparison of an average annual household water bill for a  
9   PWS customer to the MHI for the area. MHI data from the 2000 census are used at the most  
10  detailed level available for the community. Typically, county level data are used for small rural  
11  water utilities due to small population sizes. Annual water bills are determined for existing  
12  base conditions, including consideration of additional rate increases needed under current  
13  conditions. Annual water bills are also calculated after adding incremental capital and  
14  operating costs for each of the alternatives to determine feasibility under several potential  
15  funding sources. It has been suggested by agencies such as USEPA that federal and state  
16  programs consider several criteria to determine “disadvantaged communities” with one based  
17  on the typical residential water bill as a percentage of MHI.

18       Additionally, the use of standard ratios provides insight into the financial condition of any  
19  business. Three ratios are particularly significant for water utilities:

- 20       • Current Ratio = current assets (items that could be converted to cash) divided by  
21       current liabilities (accounts payable, accrued expenses, and debt) provides insight  
22       into the ability to meet short-term payments. For a healthy utility, the value should  
23       be greater than 1.0.
- 24       • Debt to Net Worth Ratio = total debt (total amount of money borrowed) divided by  
25       net worth (total assets minus total liabilities) shows to what degree assets of the  
26       company have been funded through borrowing. A lower ratio indicates a healthier  
27       condition.
- 28       • Operating Ratio = total operating revenues divided by total operating expenses  
29       show the degree to which revenues cover ongoing expenses. The value is greater  
30       than 1.0 if the utility is covering its expenses.

### 31  **2.4.2   Median Household Income**

32       The 2000 U.S. Census is used as the basis for MHI. In addition to consideration of  
33  affordability, the annual MHI may also be an important factor for sources of funds for capital  
34  programs needed to resolve water quality issues. Many grant and loan programs are available  
35  to lower income rural areas, based on comparisons of local income to statewide incomes. In  
36  the 2000 Census, MHI for the State of Texas was \$39,927, compared to the U.S. level of  
37  \$41,994. The census broke down MHIs geographically by block group and ZIP code. The  
38  MHIs can vary significantly for the same location, depending on the geographic subdivision

1 chosen. The MHI for each PWS was estimated by selecting the most appropriate value based  
2 on block group or ZIP code based on results of the site interview and a comparison with the  
3 surrounding area.

### 4 **2.4.3 Annual Average Water Bill**

5 The annual average household water bill was calculated for existing conditions and for  
6 future conditions incorporating the alternative solutions. Average residential consumption is  
7 estimated and applied to the existing rate structure to estimate the annual water bill. The  
8 estimates are generated from a long-term financial planning model that details annual revenue,  
9 expenditure, and cash reserve requirements over a 30-year period.

### 10 **2.4.4 Financial Plan Development**

11 The financial planning model uses available data to establish base conditions under which  
12 the system operates. The model includes, as available:

- 13 • Accounts and consumption data
- 14 • Water tariff structure
- 15 • Beginning available cash balance
- 16 • Sources of receipts:
  - 17 ○ Customer billings
  - 18 ○ Membership fees
  - 19 ○ Capital Funding receipts from:
    - 20 ❖ Grants
    - 21 ❖ Proceeds from borrowing
- 22 • Operating expenditures:
  - 23 ○ Water purchases
  - 24 ○ Utilities
  - 25 ○ Administrative costs
  - 26 ○ Salaries
- 27 • Capital expenditures
- 28 • Debt service:
  - 29 ○ Existing principal and interest payments
  - 30 ○ Future principal and interest necessary to fund viable operations
- 31 • Net cash flow

- 1           • Restricted or desired cash balances:
  - 2                   ○ Working capital reserve (based on 1-4 months of operating expenses)
  - 3                   ○ Replacement reserves to provide funding for planned and unplanned
  - 4                   repairs and replacements

5           From the model, changes in water rates are determined for existing conditions and for  
6           implementing the compliance alternatives.

## 7   **2.4.5   Financial Plan Results**

8           Results from the financial planning model are summarized in two areas: percentage of  
9           household income and total water rate increase necessary to implement the alternatives and  
10          maintain financial viability.

### 11   **2.4.5.1   Funding Options**

12          Results are summarized in a table that shows the following according to alternative and  
13          funding source:

- 14           • Percentage of the median annual household income the average annual residential  
15           water bill represents.
- 16           • The first year in which a water rate increase would be required
- 17           • The total increase in water rates required, compared to current rates

18          Water rates resulting from the incremental capital costs of the alternative solutions are  
19          examined under a number of funding options. The first alternative examined is always funding  
20          from existing reserves plus future rate increases. Several funding options were analyzed to  
21          frame a range of possible outcomes.

- 22           • Grant funds for 100 percent of required capital. In this case, the PWS is only  
23           responsible for the associated O&M costs.
- 24           • Grant funds for 75 percent of required capital, with the balance treated as if revenue  
25           bond funded.
- 26           • Grant funds for 50 percent of required capital, with the balance treated as if revenue  
27           bond funded.
- 28           • State revolving fund loan at the most favorable available rates and terms applicable  
29           to the communities.
- 30           • If local MHI > 75 percent of state MHI, standard terms, currently at 3.8 percent  
31           interest for non-rated entities. Additionally:
  - 32                   ○ If local MHI = 70-75 percent of state MHI, 1 percent interest rate on loan.
  - 33                   ○ If local MHI = 60-70 percent of state MHI, 0 percent interest rate on loan.

- 1           ○ If local MHI = 50-60 percent of state MHI, 0 percent interest and
- 2           15 percent forgiveness of principal.
- 3           ○ If local MHI less than 50 percent of state MHI, 0 percent interest and
- 4           35 percent forgiveness of principal.
- 5           • Terms of revenue bonds assumed to be 25-year term at 6.0 percent interest rate.

#### 6   **2.4.5.2 General Assumptions Embodied in Financial Plan Results**

7       The basis used to project future financial performance for the financial plan model  
8 includes:

- 9           • No account growth (either positive or negative).
- 10          • No change in estimate of uncollectible revenues over time.
- 11          • Average consumption per account unchanged over time.
- 12          • No change in unaccounted for water as percentage of total (more efficient water use  
13 would lower total water requirements and costs).
- 14          • No inflation included in the analyses (although the model has provisions to add  
15 escalation of O&M costs, doing so would mix water rate impacts from inflation  
16 with the impacts from the alternatives being examined).
- 17          • Minimum working capital fund established for each district, based on specified  
18 months of O&M expenditures.
- 19          • O&M for alternatives begins 1 year after capital implementation.
- 20          • Balance of capital expenditures not funded from primary grant program is funded  
21 through debt (bond equivalent).
- 22          • Cash balance drives rate increases, unless provision chosen to override where  
23 current net cash flow is positive.

#### 24   **2.4.5.3 Interpretation of Financial Plan Results**

25       Results from the financial plan model are presented in a Table 4.4 which shows the  
26 percentage of MHI represented by the annual water bill that results from any rate increases  
27 necessary to maintain financial viability over time. In some cases, this may require rate  
28 increases even without implementing a compliance alternative (the no action alternative). The  
29 table shows any increases such as these separately. The results table shows the total increase in  
30 rates necessary, including both the no-action alternative increase and any increase required for  
31 the alternative. For example, if the no action alternative requires a 10 percent increase in rates  
32 and the results table shows a rate increase of 25 percent, then the impact from the alternative is  
33 an increase in water rates of 15 percent. Likewise, the percentage of household income in the  
34 table reflects the total impact from all rate increases.

#### 2.4.5.4 Potential Funding Sources

A number of potential funding sources exist for rural utilities, which typically provide service to less than 50,000 people. Both state and federal agencies offer grant and loan programs to assist rural communities in meeting their infrastructure needs. Most are available to “political subdivisions” such as counties, municipalities, school districts, special districts, or authorities of the state with some programs providing access to private individuals. Grant funds and lower interest rates are made more available with demonstration of economic stress, typically indicated with MHI below 80 percent that of the state. The funds may be used for planning, design, and construction of water supply construction projects including, but not limited to, line extensions, elevated storage, purchase of well fields, and purchase or lease of rights to produce groundwater. Interim financing of water projects and water quality enhancement projects such as wastewater collection and treatment projects are also eligible. Some funds are used to enable a rural water provider to obtain water or wastewater service supplied by a larger utility or to finance the consolidation or regionalization of neighboring utilities. Of the three Texas agencies that offer financial assistance for water infrastructure the TWDB is the primary agencies that offers financing for privately owned water systems.

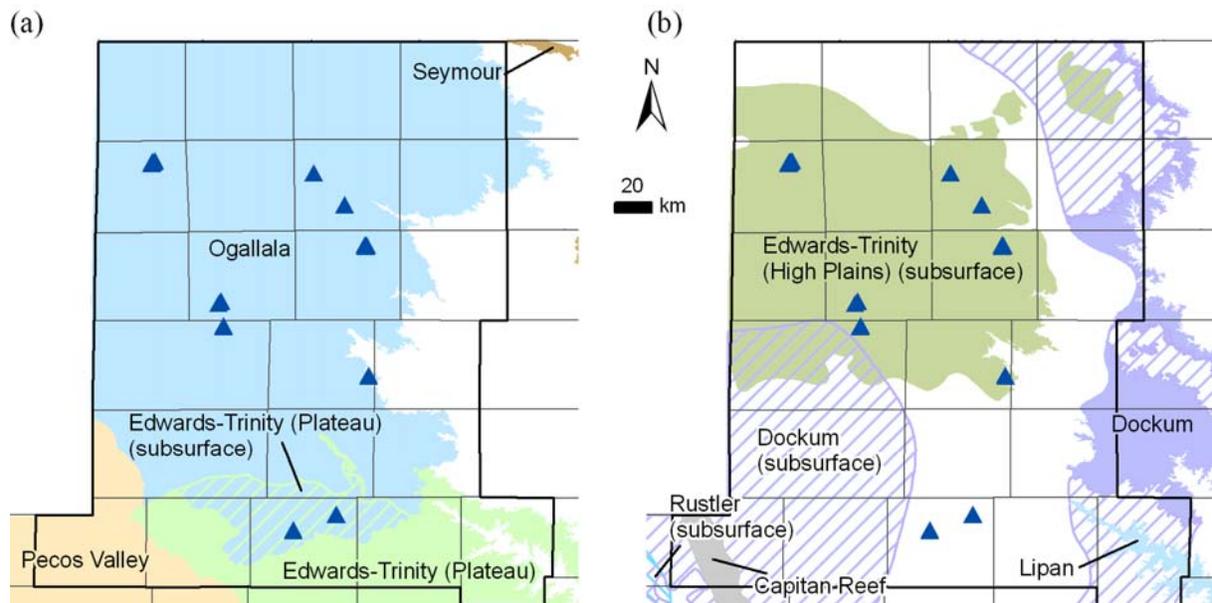
TWDB has several programs that offer loans at interest rates lower than the market offers to finance projects for drinking water systems that facilitate compliance with primary drinking water regulations. Additional subsidies may be available for disadvantaged communities. Low interest rate loans with short and long-term finance options at tax exempt rates for water or water-related projects give an added benefit by making construction purchases qualify for a sales tax exemption. Generally, the program targets customers with eligible water supply projects for all political subdivisions of the state and Water Supply Corporations with projects, but Drinking Water State Revolving Fund (DWSRF) is available to privately owned systems. Other programs with agencies such as Office of Rural Community Affairs (ORCA) and the U.S. Department of Agriculture Rural Development Texas (Texas Rural Development) coordinates federal assistance to rural Texas to help rural Americans improve their quality of life. Although, the programs with these agencies are for public systems special cases have been addressed where in need communities can receive funds by way of public entities (e.g., county). A public entity can apply for state funds and private water system be the recipient of the services (all agency criteria would still have to be met by the benefiting community).

The application process, eligibility requirements, and funding structure vary for each of these programs. There are many conditions that must be considered by each agency to determine eligibility and ranking of projects. The principal factors that affect this choice are population, percent of the population under the state MHI, health concerns, compliance with standards, Colonia status, and compatibility with regional and state plans.



1 aquifer of Triassic age, and undifferentiated Permian aquifers (not shown). Other aquifers in  
2 the area, including the Capitan Reef, Lipan, Pecos Valley, Rustler, and Seymour aquifers, are  
3 not located near any of the wells in this analysis.

4 **Figure 3.2 Major (a) and Minor (b) Aquifers in the Study Area**

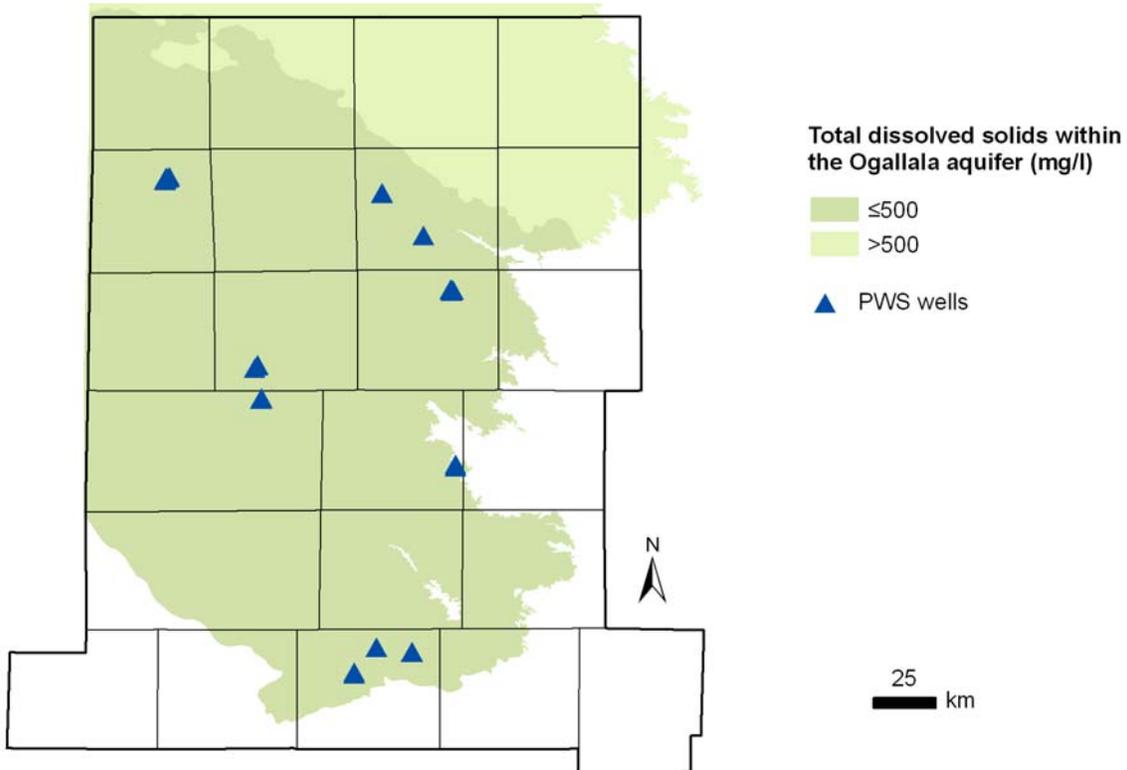


5 "Subsurface" indicates a portion of an aquifer that underlies other formations. All other labels indicate a  
6 portion of an aquifer that lies at the land surface.

7 Water quality in the Ogallala aquifer is distinctively different in the northern portion of the  
8 study area. Thus, this study analyzes the Ogallala aquifer in two parts: Ogallala-North (TDS  $\leq$   
9 500 mg/L) and Ogallala-South (TDS  $>$  500 mg/L) (Figure 3.3).

1

**Figure 3.3 Water Quality Zones in the Study Area**



2

3 Data used for this study include information from three sources:

- 4 ■ Texas Water Development Board groundwater database available at  
5 [www.twdb.state.tx.us](http://www.twdb.state.tx.us). The database includes information on the location and  
6 construction of wells throughout the state as well as historical measurements of water  
7 chemistry and levels in the wells.
- 8 ■ Texas Commission on Environmental Quality Public Water Supply database (not  
9 publicly available). The database includes information on the location, type, and  
10 construction of water sources used by PWS in Texas, along with historical  
11 measurements of water levels and chemistry.
- 12 ■ National Uranium Resource Evaluation (NURE) database available at:  
13 [tin.er.usgs.gov/nure/water](http://tin.er.usgs.gov/nure/water). The NURE dataset includes groundwater quality data  
14 collected between 1975 and 1980. The database provides well locations and depths  
15 with an array of analyzed chemical data. The NURE dataset covers only the eastern  
16 part of the study area.

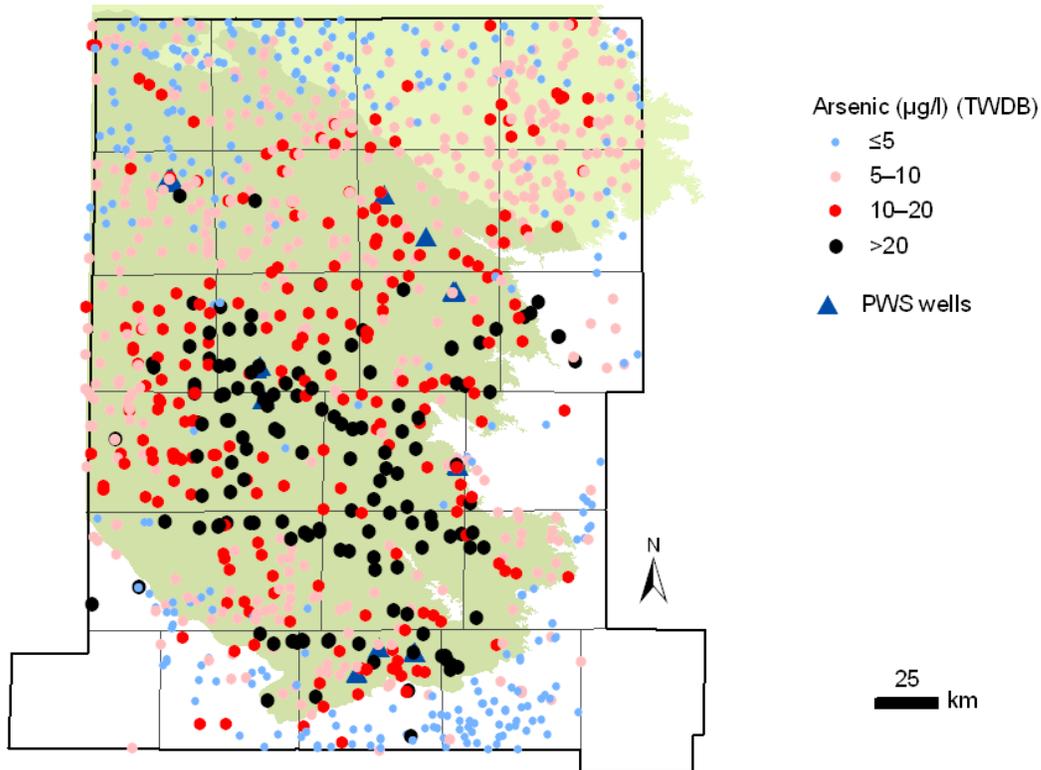
### 3.1.2 Contaminants of Concern in the Study Area

Contaminants addressed include arsenic, fluoride, nitrate, selenium, and uranium. In PWSs in the area, water sampling shows that one or more of these solutes exceeds the USEPA’s MCL.

#### Arsenic

Arsenic concentrations exceed the USEPA’s MCL (10 µg/L) throughout the study area, especially in the Ogallala-South area (Figure 3.4). Half of the wells in the Ogallala-South aquifer and one-fifth of wells in the Edwards-Trinity (High Plains) aquifer contain arsenic levels above the MCL. In contrast, only 10 percent or less of wells in the Ogallala-North, Edwards-Trinity (Plateau), and Dockum aquifers exceed the MCL for arsenic.

**Figure 3.4 Spatial Distribution of Arsenic Concentrations**



12

Data presented here are from the TWDB database. The most recent sample for each well is shown. Table 3.1 gives the percentage of wells with arsenic exceeding the MCL (10 µg/L) in each of the major aquifers in the study area.

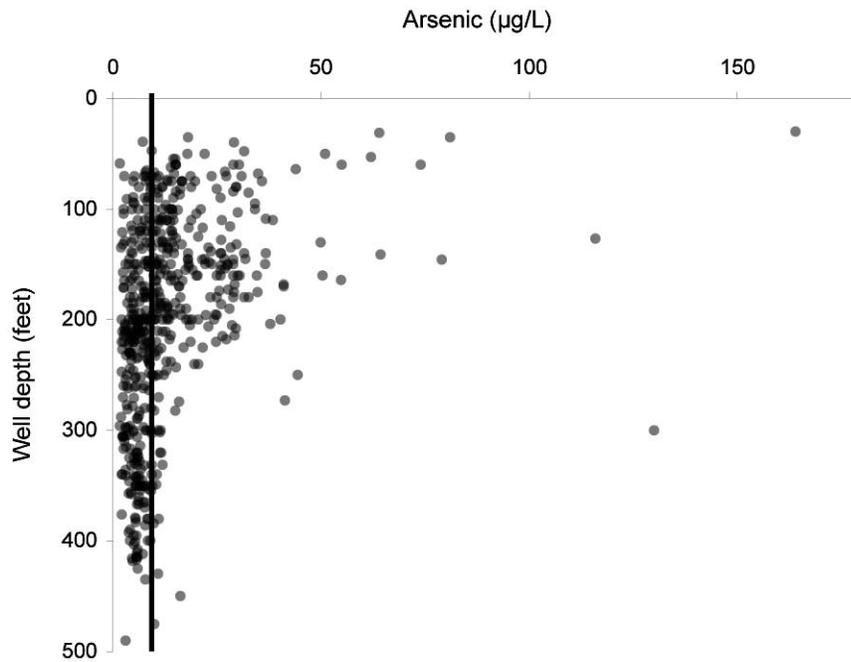
15

1 **Table 3.1 Summary of Wells that Exceed the MCL for Arsenic, by Aquifer**

Aquifer	Wells with measurements	Wells that exceed 10 µg/L	Percentage of wells that exceed 10 µg/L
Ogallala-North	228	15	7%
Ogallala-South	642	323	50%
Edwards-Trinity (Plateau)	127	13	10%
Edwards-Trinity (High Plains)	16	3	19%
Dockum	70	4	6%
Other	5	0	0%

2 There is a clear stratification of arsenic concentrations with depth in the study area (Figure  
3 3.5), with arsenic concentrations decreasing with depth. This suggests that tapping deeper  
4 water by deepening shallow wells or casing off shallower parts of wells might decrease arsenic  
5 concentrations.

6 **Figure 3.5 Arsenic Concentrations and Well Depths in the Ogallala Aquifer**

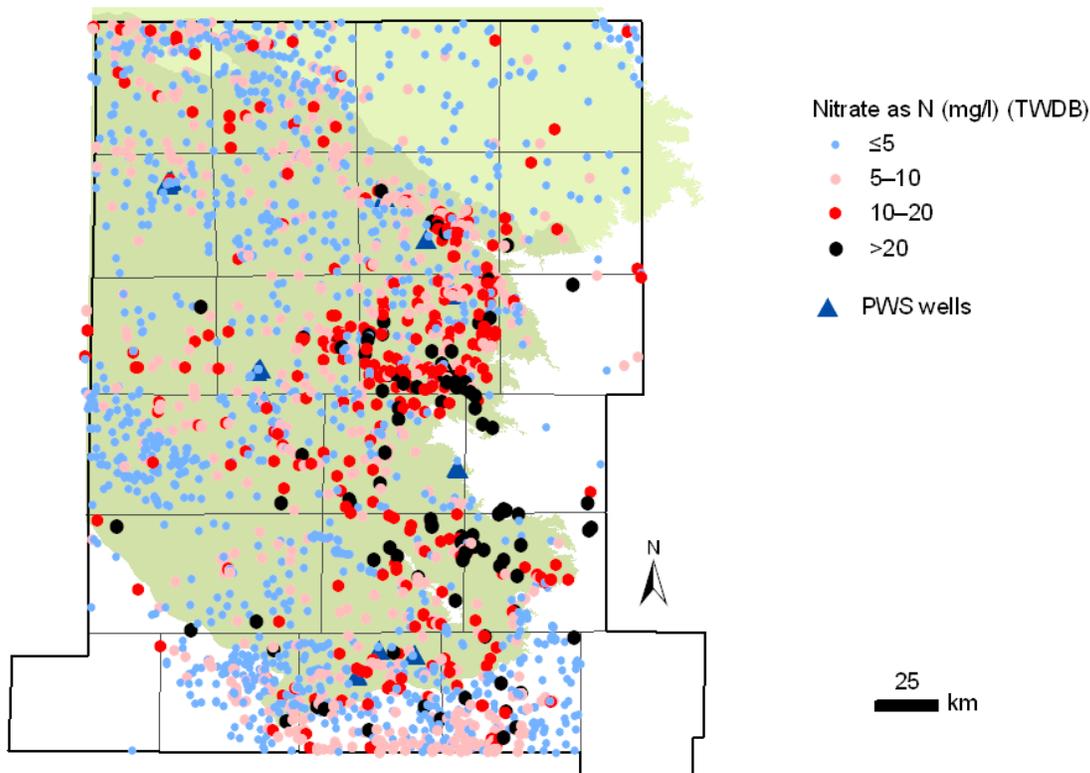


7

1 **Nitrate**

2 Nitrate concentrations exceed the MCL (10 mg/L) throughout the study area, especially in  
3 the eastern part of the Ogallala-South aquifer (Figure 3.6). In the Ogallala-North, only one  
4 percent of wells have nitrate concentrations above the MCL.

5 **Figure 3.6 Spatial Distribution of Nitrate Concentrations**



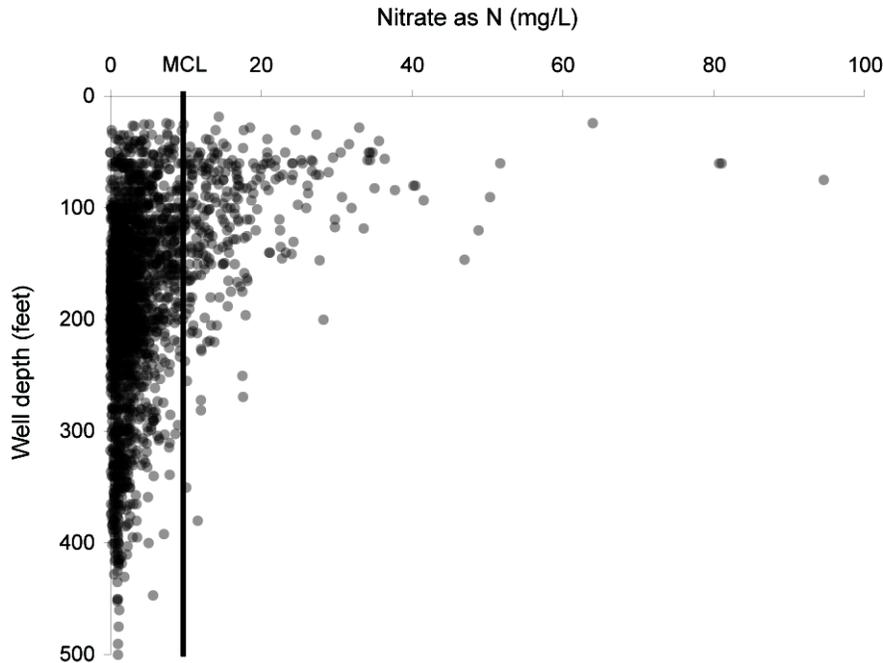
6  
7 Data presented here are from the TWDB database. The most recent measurement from  
8 each well is shown. Table 3.2 shows the percentage of wells with nitrate as N exceeding the  
9 MCL (10 mg/L).

1 **Table 3.2 Summary of Wells that Exceed the MCL for Nitrate, by Aquifer**

Aquifer	Wells with measurements	Wells that exceed 10 mg/L	Percentage of wells that exceed 10 mg/L
Ogallala-North	590	6	1%
Ogallala-South	2826	370	13%
Edwards-Trinity (Plateau)	642	39	6%
Edwards-Trinity (High Plains)	76	3	4%
Dockum	149	9	6%
Seymour	1	1	100%
other	40	5	13%

2 Within the study area, the concentration of nitrate as N tends to decrease with well depth  
3 (Figure 3.7). Nearly all wells in the Ogallala aquifer deeper than 250 feet have acceptable  
4 nitrate levels. Therefore, deepening shallow wells or casing the upper portions of problematic  
5 wells might decrease nitrate concentrations.

6 **Figure 3.7 Nitrate as N Concentrations and Well Depths in the Ogallala Aquifer**  
7 **within the Study Area**

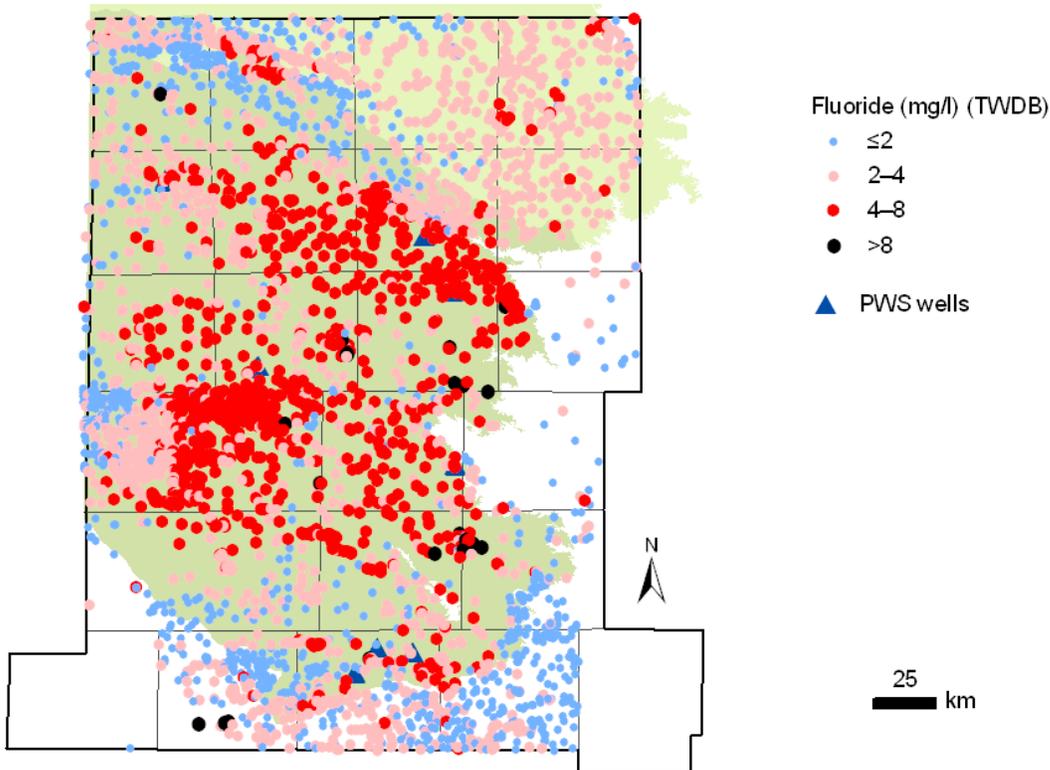


8

1 **Fluoride**

2 Fluoride concentrations above the MCL (4 mg/L) are widespread in the Ogallala-South  
3 area (42% of wells) and relatively rare in the Ogallala-North area (2% of wells) (Figure 3.8,  
4 Table 3.3). Fluoride levels are also high in the Edwards-Trinity (High Plains) aquifer, with  
5 over half of wells in the aquifer containing fluoride in excess of the MCL.

6 **Figure 3.8 Spatial Distribution of Fluoride Concentrations**



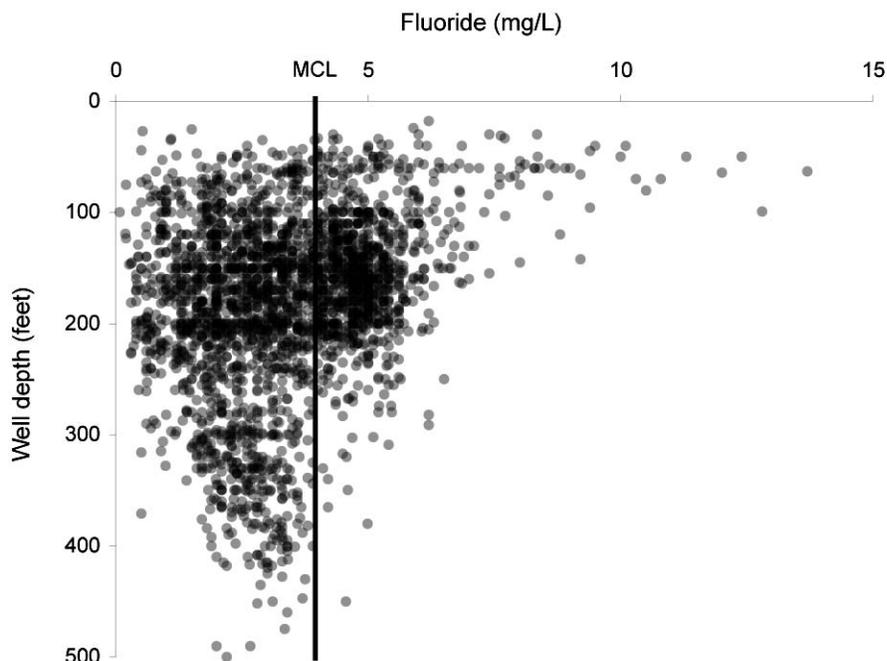
7  
8 Data presented here are from the TWDB database. The most recent measurement from  
9 each well is shown. Table 3.3 shows the percentage of wells with fluoride exceeding the MCL  
10 (4 mg/L).

11 **Table 3.3 Summary of Wells that Exceed the MCL for Fluoride, by Aquifer**

Aquifer	Wells with measurements	Wells that exceed 4 mg/L	Percentage of wells that exceed 4 mg/L
Ogallala-North	588	13	2%
Ogallala-South	2622	1098	42%
Edwards-Trinity (Plateau)	626	5	1%
Edwards-Trinity (High Plains)	76	40	53%
Dockum	144	10	7%
other	29	5	17%

1 Comparing fluoride levels with well depth, it is clear that the highest fluoride  
2 concentrations occur in wells shallower than about 100 feet and that concentrations tend to  
3 decrease with well depth (Figure 3.9). However, fluoride levels above the MCL are common  
4 in wells 100–200 feet deep. Based on this trend, deepening shallow wells or casing the  
5 shallower portions of wells could lead to decreased fluoride concentrations in produced  
6 groundwater.

7 **Figure 3.9 Fluoride Concentrations and Well Depths in the Ogallala Aquifer within**  
8 **the Study Area**

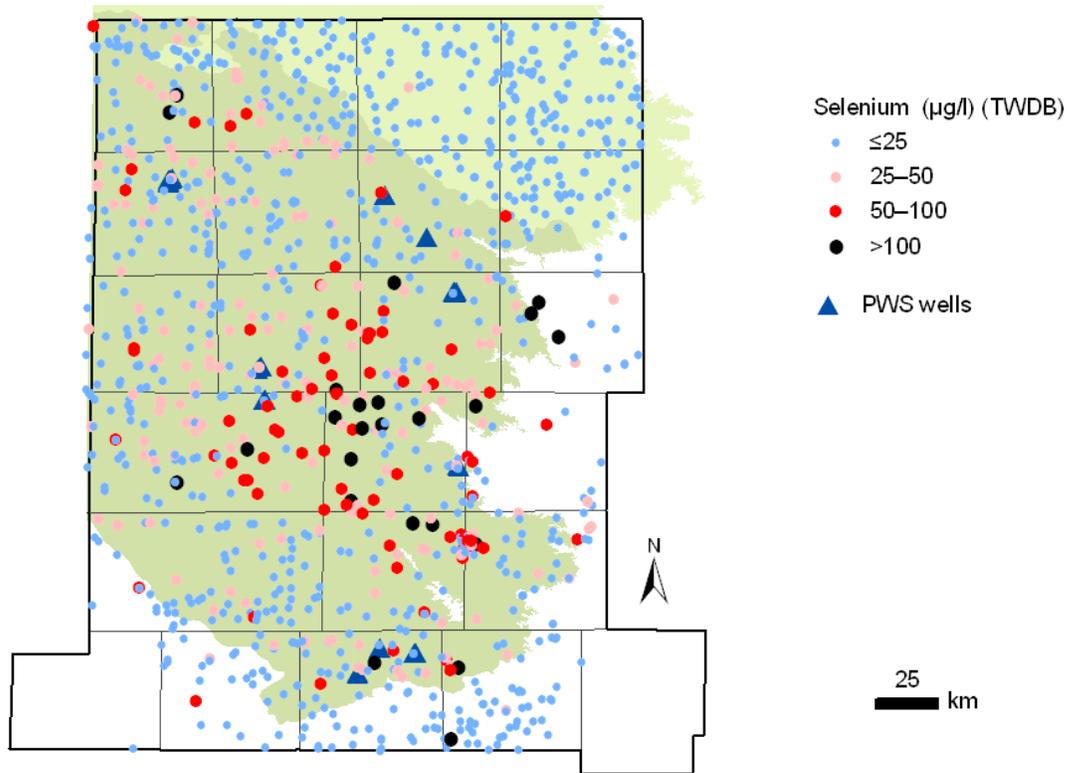


9

1 **Selenium**

2 Selenium concentrations in the study area are generally below the MCL (50 µg/L).  
3 However, some wells with excess selenium occur in the Dockum and Ogallala-South aquifers,  
4 particularly in the eastern part of the study area (Figure 3.10, Table 3.4).

5 **Figure 3.10 Spatial Distribution of Selenium Concentrations**



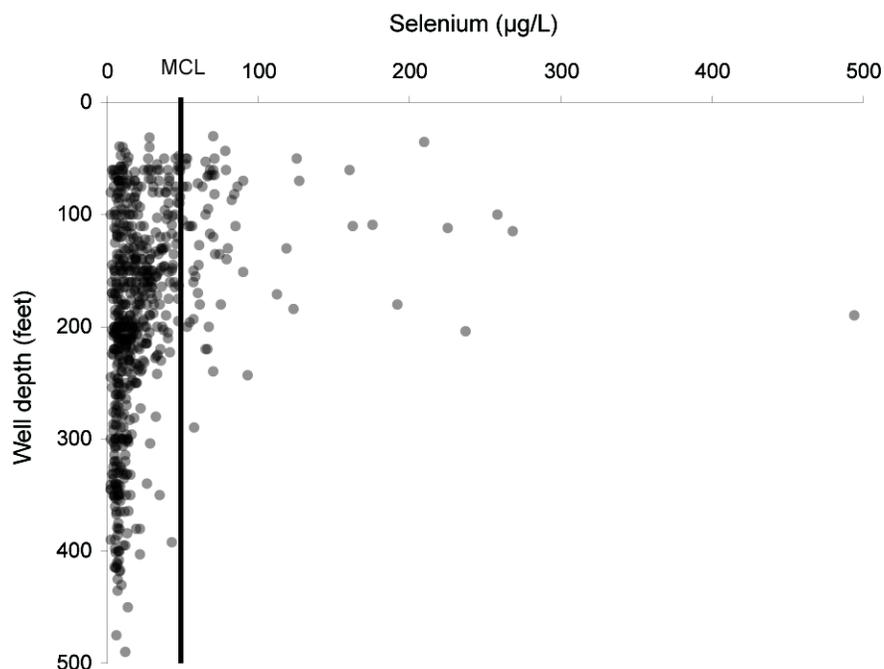
6  
7 Data presented here are from the TWDB database. The most recent sample for each well  
8 is shown. Table 3.4 shows the percentage of wells with selenium concentrations exceeding the  
9 selenium MCL (50 µg/L).

1 **Table 3.4 Summary of Wells that Exceed the MCL for Selenium, by Aquifer**

Aquifer	Wells with measurements	Wells that exceed 50 µg/L	Percentage of wells that exceed 50 µg/L
Ogallala-North	233	0	0%
Ogallala-South	693	84	12%
Edwards-Trinity (Plateau)	104	1	1%
Edwards-Trinity (High Plains)	16	1	6%
Dockum	74	10	14%
Other	5	1	20%

2 Selenium shows a trend with well depth similar to that of the other constituents discussed  
3 (Figure 3.11). Most wells with selenium concentrations above the MCL are shallower than  
4 200 feet. Thus, deepening a well to more than 200 feet or casing the shallower portion of  
5 deeper wells could lead to reduced selenium concentrations.

6 **Figure 3.11 Selenium Concentrations and Well Depths in the Ogallala Aquifer within**  
7 **the Study Area**

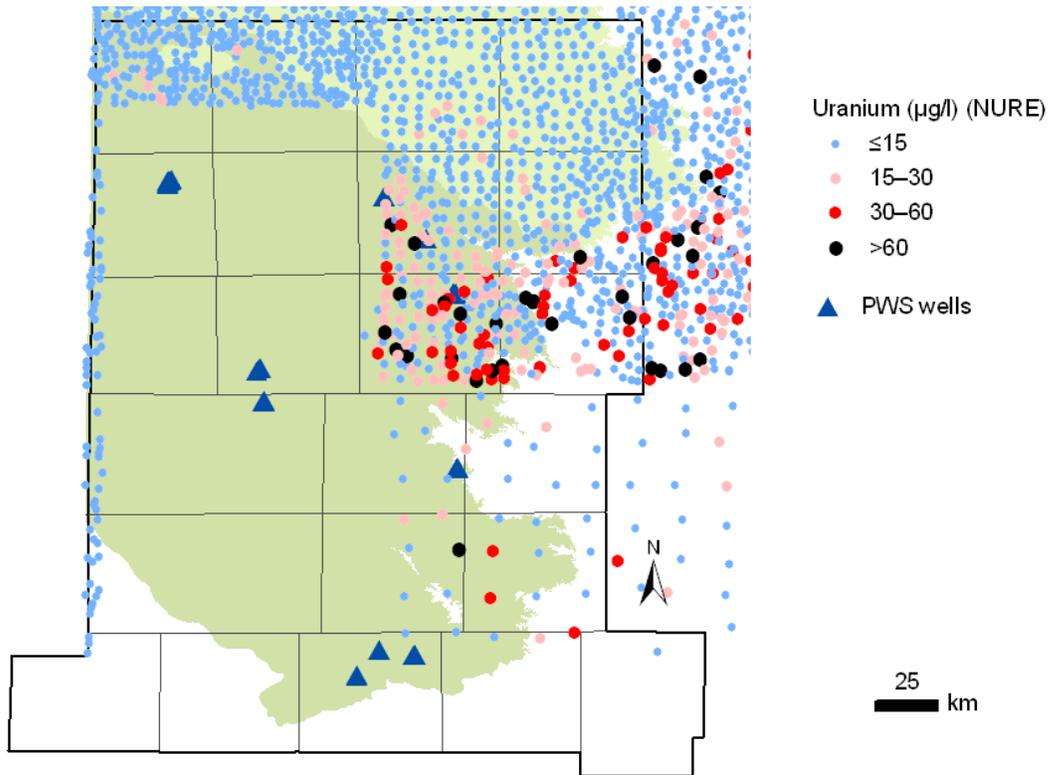


8

1 **Uranium**

2 The TWDB rarely tests wells for uranium content in water samples, but the NURE  
3 database provides a large dataset of uranium levels in the area. This database only includes  
4 wells from part of the study area, as shown in Figure 3.12. Even with this limited distribution  
5 of measurements, it is clear that uranium concentrations are much higher in the Ogallala-South  
6 aquifer than the Ogallala-North aquifer. However, the NURE database does not include  
7 information about which aquifer the sampled wells are from, so a quantitative comparison of  
8 uranium levels by aquifer is not available.

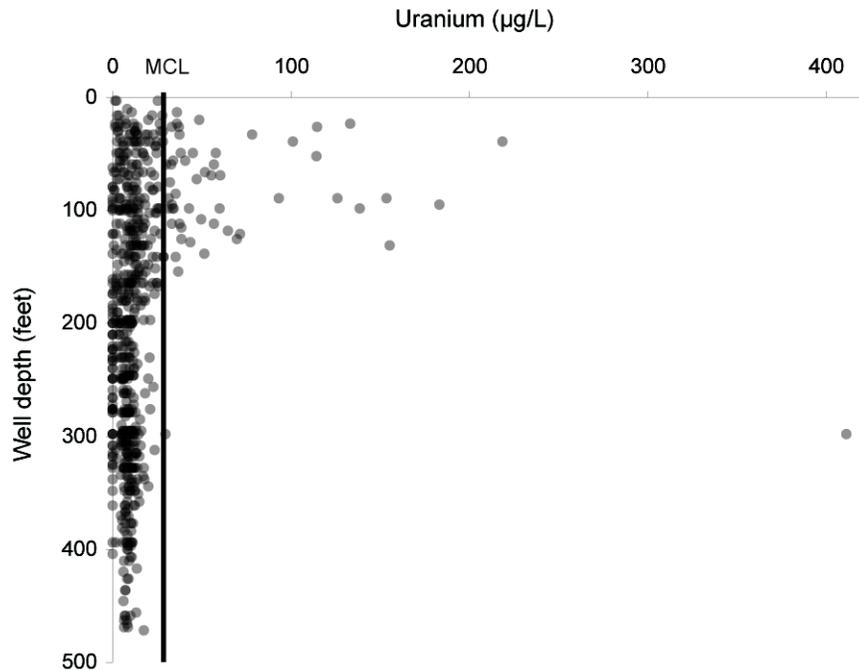
9 **Figure 3.12 Spatial Distribution of Uranium Concentrations in the Study Area**



10

11 A comparison of uranium concentrations and well depths shows that nearly all wells with  
12 uranium levels above the MCL are less than about 150 feet deep (Figure 3.13). Therefore,  
13 deepening or casing wells to access water from greater depths might reduce uranium levels.

1 **Figure 3.13 Uranium Concentrations and Well Depths in the Study Area**



2

### 3 **3.1.3 Regional Geology**

4 The major aquifer in the study area is the Ogallala aquifer, which is equivalent to the  
5 Ogallala Formation, the predominant geologic unit that makes up the High Plains aquifer. The  
6 Ogallala Formation is late Tertiary (Miocene–Pliocene, or about 2–12 million years ago)  
7 (Nativ 1988). It consists of coarse fluvial sandstone and conglomerates that were deposited in  
8 the paleovalleys of a mid-Tertiary erosional surface and eolian sand deposited in intervening  
9 upland areas (Gustavson and Holliday 1985). In the Ogallala-North area, the Ogallala  
10 Formation consists largely of sediments within a paleovalley. In this region, the saturated  
11 thickness of the aquifer is greater and the water table is deeper. In contrast, the formation is  
12 composed of deposition on top of a paleoupland in the Ogallala-South area. Here the formation  
13 is thinner, resulting in a smaller saturated thickness and shallower water table. The top of the  
14 Ogallala Formation is marked in many places by a resistant calcite layer known as the “caprock  
15 caliche.”

16 Within much of the study area, the Ogallala Formation is overlain by Quarternary-age  
17 (Pleistocene–Holocene) eolian, fluvial, and lacustrine sediments, collectively called the  
18 Blackwater Draw Formation (Holliday 1989). The texture of the formation ranges from sands  
19 and gravels along riverbeds to clay-rich sediments in playa floors.

20 In much of the southern High Plains, the Ogallala Formation lies on top of Lower  
21 Cretaceous (Comanchean) strata. The top of the Cretaceous sediments is marked by an uneven  
22 erosional surface that represents the end of the Laramide orogeny. Cretaceous strata are absent  
23 beneath the thick Ogallala paleovalley fill deposits because they were removed by prior

1 erosion. The Cretaceous sediments were deposited in a subsiding shelf environment and  
2 consist of the Trinity Group (including the basal sandy, permeable Antlers Formation); the  
3 Fredericksburg Group (limey to shaley formations, including the Walnut, Comanche Peak, and  
4 Edwards Formations, as well as the Kiamichi Formation); and the Washita Group (low-  
5 permeability, shaley sediments of Duck Creek Formation) (Nativ 1988). The sequence results  
6 in two main aquifer units: the Antlers Sandstone (also termed the Trinity or Paluxy sandstone,  
7 about 49 feet thick) and the Edwards Limestone (about 98 feet thick). These aquifer units  
8 constitute the Edwards-Trinity (High Plains) aquifer (Ashworth and Flores 1991). The  
9 limestone decreases in thickness to the northwest and transitions into the Kiamichi and Duck  
10 Creek formations.

11 The Ogallala Formation also overlies the Triassic Dockum Group in much of the southern  
12 High Plains. The Dockum Group is generally about 492 feet thick and is exposed along the  
13 margins of the High Plains. The uppermost sediments consist of red mudstones that generally  
14 form an aquitard. Underlying units (Trujillo Sandstone [Upper Dockum] and Santa Rosa  
15 Sandstone [lower Dockum]) form the Dockum aquifer. Water quality in the Dockum is  
16 generally poor (Dutton and Simpkins 1986). The sediments of the Dockum were deposited in a  
17 continental fluvio-lacustrine environment that included streams, deltas, lakes, and mud flats  
18 (McGowen et al. 1977) and included alternating arid and humid climatic conditions. The  
19 Triassic rocks reach up to 1,956 feet thick in the Midland Basin.

### 20 **3.2 DETAILED ASSESSMENT FOR WHORTON MOBILE HOME PARK PWS**

21 The Whorton Mobile Home Park PWS has two wells, G1520149A and G1520149B. Both  
22 wells are recorded to be 143 feet deep and within the Ogallala aquifer. Each well has its own  
23 sampling tap, and well G1520149A also has a vended entry point. Samples taken from the  
24 vended entry point are most likely treated groundwater and so do not represent actual  
25 groundwater quality. Table 3.5 summarizes fluoride and arsenic concentrations measured from  
26 the Whorton Mobile Home Park PWS.

1 **Table 3.5 Fluoride and Arsenic Concentrations in the Whorton Mobile Home Park**  
2 **PWS**

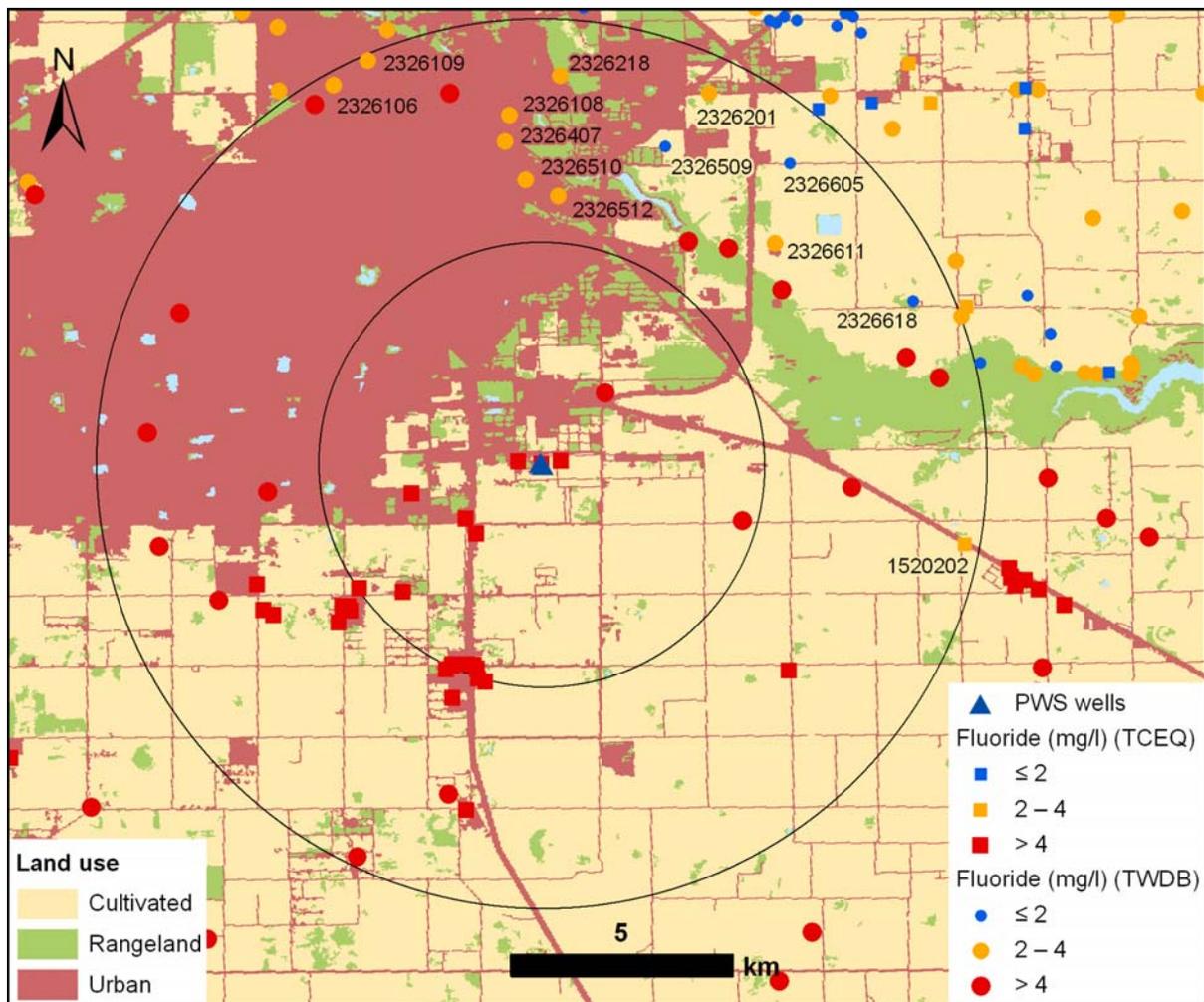
Date	Fluoride (mg/L)	Arsenic (µg/L)	Well sampled
6/23/98	7.0	-	G1520149A
3/13/01	6.7	19.5	G1520149A
6/27/02	7.7	-	G1520149A
3/17/03	0.2	-	G1520149A (vended entry)
3/17/03	7.4	-	G1520149A
3/17/03	7.5	-	G1520149B
9/3/03	0.1	-	G1520149A (vended entry)
9/3/03	7.2	-	G1520149A
9/3/03	6.7	-	G1520149B
12/1/03	0.2	-	G1520149A (vended entry)
12/1/03	6.9	-	G1520149A
12/1/03	6.8	-	G1520149B
1/28/04	-	14.4	G1520149A, G1520149B, G1520149A (vended entry)
1/28/04	7.3	-	G1520149A
1/28/04	7.9	-	G1520149B
4/12/04	6.7	-	G1520149A
9/30/04	7.0	-	G1520149A
10/21/04	7.3	-	G1520149A
3/28/05	7.6	18.4	G1520149A
3/28/05	-	19.3	G1520149B
6/6/05	7.3	20.6	G1520149A
6/6/05	-	21.1	G1520149B
6/21/05	1.0	21.6	G1520149A (vended entry)
9/19/05	6.9	19.5	G1520149A
9/19/05	6.5	14.3	G1520149A (vended entry)
12/1/05	7.4	20.5	G1520149A
12/1/05	7.3	-	G1520149A
12/1/05	7.2	21.0	G1520149B
12/1/05	7.1	-	G1520149B
12/1/05	0.6	<2.0	G1520149A (vended entry)
12/1/05	0.6	-	G1520149A (vended entry)
3/6/06	7.4	20.5	G1520149A
3/6/06	7.3	20.3	G1520149B
3/6/06	0.3	<2.0	G1520149A (vended entry)
6/20/06	7.3	20.7	G1520149A
6/20/06	7.4	20.5	G1520149B
6/20/06	6.9	-	G1520149A (vended entry)
9/7/06	7.2	19.5	G1520149A
9/7/06	7.7	19.6	G1520149B
9/7/06	7.1	-	G1520149A (vended entry)
12/12/06	6.7	19.8	G1520149A
12/12/06	6.7	20.1	G1520149B
12/12/06	6.8	-	G1520149 (vended entry)
3/6/07	6.6	17.0	G1520149A
3/6/07	6.7	17.1	G1520149B
3/6/07	0.9	-	G1520149 (vended entry)

Data from the TCEQ PWS Database

1 The wells have been tested several times for fluoride and arsenic concentrations between  
2 1998 and 2007. Thirty-five of 43 fluoride measurements and 21 of 23 arsenic measurements  
3 exceed the MCLs (4 mg/L and 10 µg/L for fluoride and arsenic, respectively). The  
4 distributions of fluoride and arsenic concentrations in nearby wells are shown in Figures 3.14  
5 and 3.15.

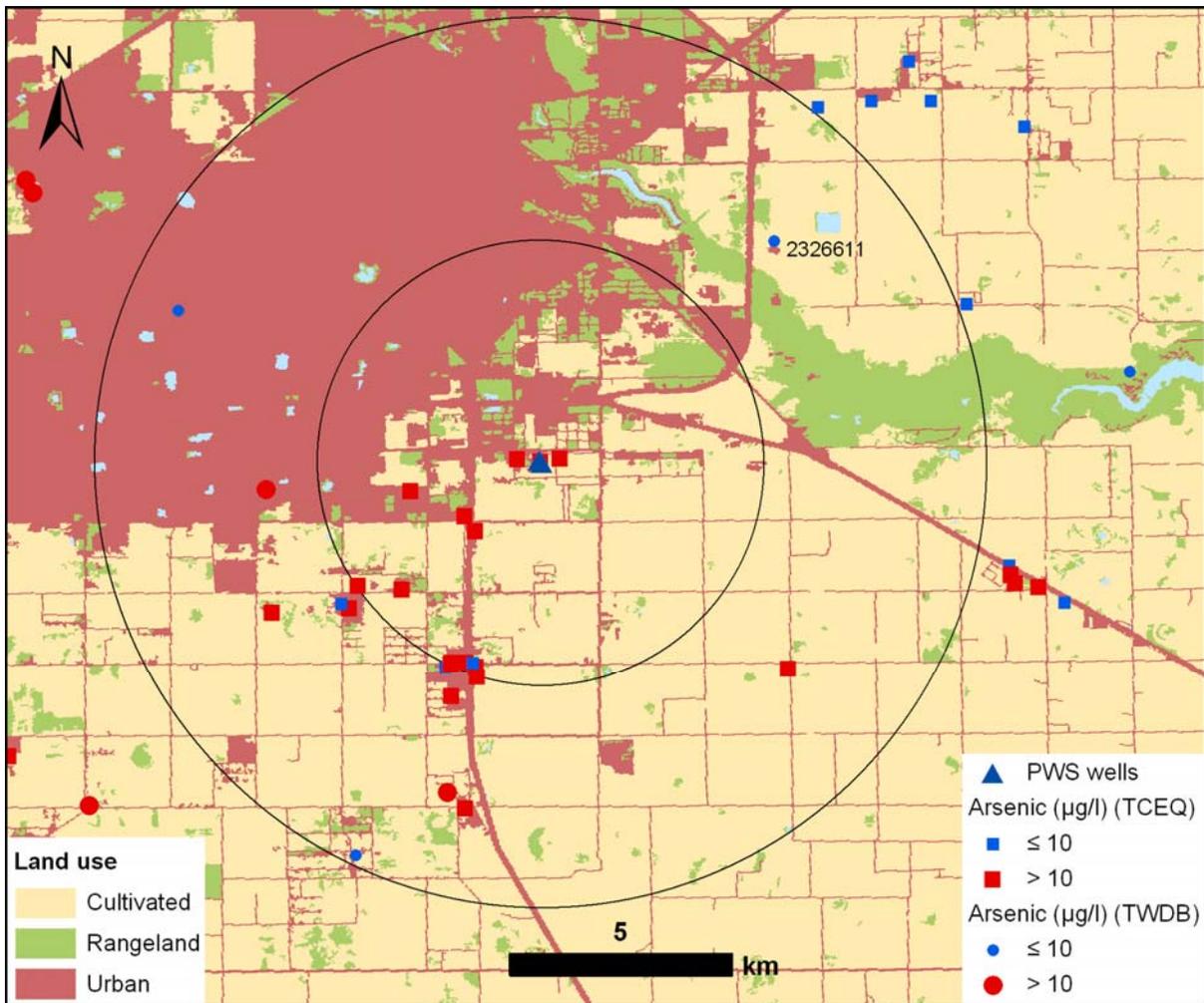
6 Most but not all measurements from the vended entry point show acceptable levels of both  
7 constituents. Pumping and treatment records could help to indicate under what conditions  
8 these levels were measured. Continuing these same treatment and pumping procedures might  
9 provide more consistently good water quality.

10 **Figure 3.14 Fluoride Concentrations within 5- and 10-km Buffers around the Whorton**  
11 **Mobile Home Park PWS Wells**



12

1 **Figure 3.15 Arsenic Concentrations within 5- and 10-km Buffers around the Whorton**  
2 **Mobile Home Park PWS Wells**



3  
4 Data are from the TCEQ and TWDB databases. Two types of samples were included in  
5 the analysis. Samples from the TCEQ database (shown as squares on the map) represent the  
6 most recent sample taken at a PWS, which can be raw samples from a single well or entry point  
7 samples that may combine water from multiple sources. Samples from the TWDB database are  
8 taken from single wells (shown as circles in the map). Where more than one measurement has  
9 been made in a well, the most recent concentration is shown.

10 Figures 3.14 and 3.15 show several wells between 3.1 and 6.2 miles to the north of the  
11 PWS wells that have shown acceptable fluoride and nitrate levels in the past. Additional  
12 information about these wells is listed in Table 3.6. None of these wells have been sampled in  
13 the last 20 years, and none have been sampled for arsenic, selenium, or uranium. Many of the  
14 wells are currently unused and so might be available as an alternative supply. However,  
15 updated measurements should be obtained to ensure that they meet water quality standards.

**Table 3.6 Most Recent Concentrations of Select Constituents in Potential Alternative Water Sources**

Well	Owner	Depth (ft)	Aquifer	Use	Date	Arsenic (µg/L)	Fluoride (mg/L)	Nitrate as N (mg/L)	Selenium (µg/L)
2326106	City of Lubbock	122	Ogallala	unused	9/22/1944	-	3.4	0.9	-
2326108	South Plains Fair	142	Ogallala	unused	9/22/1944	-	3.3	0.9	-
2326109	City of Lubbock	145	Ogallala	unused	9/22/1944	-	3.5	0.7	-
2326201	Exp. Station #8	185	Ogallala	irrigation	9/30/1937	-	2.5	0.7	-
2326218	City of Lubbock	135	Ogallala	unused	9/22/1944	-	2.2	0.4	-
2326407	City of Lubbock	155	Ogallala	unused	9/25/1944	-	3.4	1.2	-
2326509	unknown	unknown	Ogallala	irrigation	4/13/1988	-	2	24.4	-
2326510	City of Lubbock	148	Ogallala	unused	9/25/1944	-	3.5	1.2	-
2326512	City of Lubbock	151	Ogallala	unused	9/25/1944	-	3.4	2.3	-
2326605	unknown	unknown	Ogallala	irrigation	4/11/1988	-	1.9	12.5	-
2326618	City of Lubbock	115	Ogallala	recreation irrigation	4/12/1988	-	1.7	3.4	-

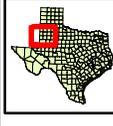
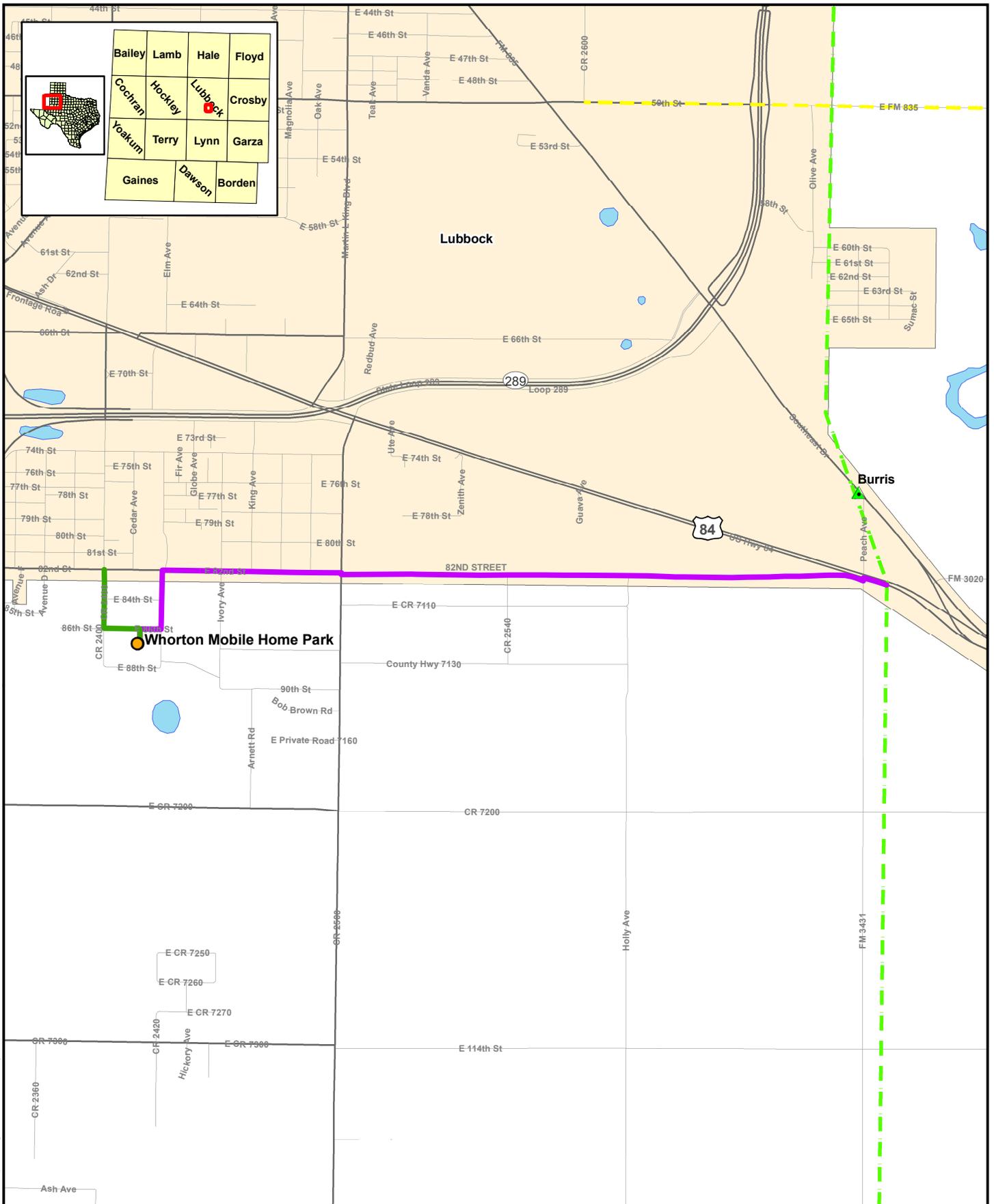
**3.2.1 Summary of Alternative Groundwater Sources for the Whorton Mobile Home Park PWS**

Several unused wells to the north of the PWS wells show acceptable levels of fluoride and nitrate but have not been sampled for arsenic, selenium, or uranium. They should be resampled before being chosen as an alternative supply.

Historical sampling from the existing PWS wells shows that a vended entry point (probably indicating treated groundwater) often contains acceptable levels of fluoride and arsenic. A review of pumping and treatment records might indicate specific procedures that resulted in improved water quality and that could be continued to maintain this solute concentrations.

While the nearby wells with acceptable solute concentrations are similar in depth to the PWS wells, regional analyses show that water quality tends to improve when wells are greater than 250 feet deep. Therefore, deepening the existing PWS wells could provide an additional way to meet water quality standards.

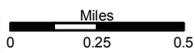




Bailey	Lamb	Hale	Floyd
Cochran	Hockley	Lubbock	Crosby
Yoakum	Terry	Lynn	Garza
Gaines	Dawson	Borden	

**Legend**

- Study System
- PWS's
- Cities
- City Limits
- Counties
- Major Road
- Minor Road
- CRMWA Pipeline
- Lubbock Pipeline
- Grass Valley Pipeline
- WT-1 City of Lubbock - 0.5 Miles
- WT-2 CRMWA Line Lubbock to Tahoka - 3.5 Miles



**Figure 4.1**

**WHORTON MOBILE HOME PARK  
Pipeline Alternative**

- 1           • Total production capacity: 0.072 mgd
- 2           Basic system raw water quality data is as follows:
- 3           • Typical arsenic range: 0.0152 mg/L to 0.0202 mg/L
- 4           • Typical fluoride range: 4.0 mg/L to 7.7 mg/L
- 5           • Typical calcium range: 23.6 mg/L to 35.0 mg/L
- 6           • Typical chloride range: 36 mg/L to 67.0 mg/L
- 7           • Typical iron range: 0.010 mg/L to 0.018 mg/L
- 8           • Typical magnesium range: 26.0 mg/L to 39.5 mg/L
- 9           • Typical manganese range: < 0.008 mg/L
- 10          • Typical nitrate range: 0.43 mg/L to 2.75 mg/L
- 11          • Typical selenium range: 0.0059 to 0.0076 mg/L
- 12          • Typical sodium range: 67.8 mg/L to 90.6 mg/L
- 13          • Typical sulfate range: 48 to 90 mg/L
- 14          • Total hardness as CaCO<sub>3</sub> range: 180 to 248 mg/L
- 15          • Typical pH range: 7.4 to 8.0
- 16          • Total alkalinity as CaCO<sub>3</sub> range: 225 to 247 mg/L
- 17          • Typical bicarbonate range: 275 mg/L to 301 mg/L
- 18          • Typical total dissolved solids range: 367 to 487 mg/L

19           The typical ranges for water quality data listed above are based on a TCEQ database that  
20           contains data updated through the beginning of 2005.

21           Alternative that replace the two existing wells will require in the installation of a storage  
22           tank and service pump set at each well entry point to the distribution system. It may be  
23           possible to eliminate one of the on-site pump stations and tanks through a more detailed  
24           hydraulic study, which is out-side the scope of this study.

#### 25   **4.1.2 Capacity Assessment for Whorton Mobile Home Park Water System**

26           The project team conducted a capacity assessment of the Whorton Mobile Home Park  
27           water system on July 16, 2008. Results of this evaluation are separated into four categories:  
28           general assessment of capacity, positive aspects of capacity, capacity deficiencies, and capacity  
29           concerns. The general assessment of capacity describes the overall impression of FMT  
30           capability of the water system. The positive aspects of capacity describe the strengths of the  
31           system. These factors can provide the building blocks for the system to improve capacity  
32           deficiencies. The capacity deficiencies noted are those aspects creating a particular problem  
33           for the system related to long-term sustainability. Primarily, those problems are related to the

1 system's ability to meet current or future compliance, ensure proper revenue to pay the  
2 expenses of running the system, and ensure proper operation of the system. The last category,  
3 capacity concerns, consists of items not causing significant problems for the system at this  
4 time. However, the system may want to address them before they become problematic.

5 Because of the challenges facing very small water systems, it is increasingly important for  
6 them to develop the internal capacity to comply with all state and federal requirements for  
7 public drinking water systems. For example, it is especially important for very small water  
8 systems to develop long-term plans, set aside money in reserve accounts, and track system  
9 expenses and revenues because they cannot rely on increased growth and economies of scale to  
10 offset their costs. In addition, it is crucial for the owner, manager, and operator of a very small  
11 water system to understand the regulations and participate in appropriate training. Providing  
12 safe drinking water is the responsibility of every public water system, including those very  
13 small water systems that face increased challenges with compliance.

14 The project team interviewed Barbara Whorton, Owner and Manager. Mrs. Whorton's son  
15 also sat in on the interview.

#### 16 **4.1.2.1 General Structure of the Water System**

17 The Whorton Mobile Home Park water system is owned and managed by Barbara  
18 Whorton. She has hired Darrel Davis of the Bob Johnson Company as the certified operator.  
19 There are currently 26 lots connected to the water system. Four additional lots are not  
20 currently rented. The owner has no plans to expand the MHP. The lots currently rent for \$175  
21 per month. This is an increase from the previous year when lots rented for \$125 per month.  
22 The lot rental includes water, sewer, and trash pickup. The owner is only able to estimate a  
23 portion of expenses for the water system such as \$132 a month for the operator and \$54 a  
24 month for the water dispenser using a reverse osmosis system. The system exceeds the arsenic  
25 and fluoride standards. The owner has a contract with Culligan to maintain a reverse osmosis  
26 system at Lot #1 for anyone at the MHP to use.

#### 27 **4.1.2.2 General Assessment of Capacity**

28 Based on the team's assessment, this system has an inadequate level of capacity. Although  
29 there is a positive aspect of capacity, there are some areas that need improvement, such as the  
30 FMT aspects of the water system.

#### 31 **4.1.2.3 Positive Aspects of Capacity**

32 In assessing a system's overall capacity, it is important to look at all aspects – positive and  
33 negative. It is important for systems to understand those characteristics that are working well,  
34 so those activities can be continued or strengthened. In addition, these positive aspects can  
35 assist the system in addressing the capacity deficiencies or concerns. The factor particularly  
36 important for Whorton MHP is listed below.

- 1 • **Dedicated Owner/Manager** – Ms. Whorton has lived on site since 1978. She plans  
2 to continue managing the MHP water system.

#### 3 **4.1.2.4 Capacity Deficiencies**

4 The following capacity deficiencies were noted in conducting the assessment and seriously  
5 impact the ability of the water system to comply with current and future regulations to ensure  
6 long-term sustainability.

- 7 • **Lack of Long Term Capital Planning for Compliance and Sustainability** –  
8 There appears to be no long term plan in place to achieve and maintain compliance  
9 and ensure the long-term sustainability of the water system. Although the owner  
10 has been aware of the fluoride and arsenic compliance problem, she has not  
11 developed a long-term plan for achieving compliance at some point into the future.  
12 Without some type of planning process, the owner is not able to plan for the revenue  
13 needed to make system improvements or add treatment processes. The system can  
14 also use the long-term planning process to help identify financing strategies to pay  
15 for long-term needs.
- 16 • **Lack of separate accounting for water systems** – The owner stated that she  
17 believes the lot fees cover expenses of the water system. Without a separate  
18 accounting method for the water system, it is not possible to know how much of the  
19 rent collected is set aside for water operations. The owner stated that she does not  
20 have a reserve fund and any additional expenses for the water system she pays for  
21 personally. Without knowing exactly what amount of the rent is dedicated to the  
22 water system, it is difficult to know the true impact of adding additional treatment to  
23 meet compliance. It is also hard to know whether the new treatment is affordable  
24 for the owner and customers. The owner should have sufficient revenue for the  
25 operation, maintenance, and future replacements. The system should operate on its  
26 own revenues and should have a reserve fund for major equipment replacement.  
27 This lack may pose risks if insufficient funding results in an inability to maintain  
28 and upgrade the facility or maintain sufficient stocks of spare parts, chemicals, or  
29 equipment.
- 30 • **Lack of Compliance with Fluoride and Arsenic Standards** – The water system is  
31 not in compliance with the fluoride and arsenic standards.

#### 32 **4.1.2.5 Potential Capacity Concerns**

33 The following item is a concern regarding capacity but no specific operational, managerial,  
34 or financial problems can be attributed to this item at this time. The system should address the  
35 items listed below to further improve FMT capabilities to improve the system’s long-term  
36 sustainability.

- 37 • **Lack of Knowledge of SDWA Regulations** – The owner indicated that she is not  
38 familiar with SDWA regulations, and that she relies on the operator to operate the  
39 system in compliance with TCEQ regulations. Although the contract operator is

1 certified and trained, it is still a good practice for the system owner/manager to be  
2 familiar with the SDWA requirements that apply to their system, because the owner  
3 is ultimately responsible for regulatory compliance.

## 4 **4.2 ALTERNATIVE WATER SOURCE DEVELOPMENT**

### 5 **4.2.1 Identification of Alternative Existing Public Water Supply Sources**

6 Using data drawn from the TCEQ drinking water and TWDB groundwater well databases,  
7 the PWSs surrounding the Whorton MHP PWS were reviewed with regard to their reported  
8 drinking water quality and production capacity. PWSs that appeared to have water supplies  
9 with water quality issues were ruled out from evaluation as alternative sources, while those  
10 without identified water quality issues were investigated further. Systems were only  
11 considered if they were 10 miles of the Whorton MHP PWS. Table 4.1 is a list of the selected  
12 PWSs based on these criteria for large and small PWSs within 10 miles of the Whorton MHP.  
13 If it was determined these PWSs had excess supply capacity and might be willing to sell the  
14 excess, or might be a suitable location for a new groundwater well, the system was taken  
15 forward for further consideration and identified with “EVALUATE FURTHER” in the  
16 comments column of Table 4.1.

17 **Table 4.1 Selected Public Water Systems within 10 Miles of the**  
18 **Whorton MHP**

PWS ID	PWS Name	Distance from Whorton MHP (miles)	Comments/Other Issues
1520192	TERRELLS MOBILE HOME PARK	0.23	Smaller GW system. WQ issues: arsenic, fluoride, gross alpha
1520002	CITY OF LUBBOCK	0.25	Larger SW/GW system. No WQ issues. <b>Evaluate Further</b>
1520231	CENTRAL FREIGHT LINES	0.28	Larger GW system. WQ issue: arsenic and fluoride
1520130	MCLAIN OIL CO STATION 39	0.95	Larger GW system. WQ issues: arsenic and fluoride
1520147	BECKER PUMP & PIPE WATER SUPPLY	1.04	Larger GW system. WQ issues: arsenic and fluoride
1520009	BIG Q MOBILE HOME ESTATES	1.38	Larger GW system. WQ issues: arsenic, combined uranium, fluoride and gross alpha
1520067	114TH STREET MOBILE HOME PARK	2.27	Smaller GW system. WQ issues: arsenic, and fluoride
1520236	PRATERS FOODS INC	2.55	Larger GW system. WQ issues: arsenic and fluoride
1520142	COUNTRY SQUIRE MHP 1	2.65	Larger GW system. WQ issue: arsenic, fluoride, gross alpha and nitrate
1520184	PETES DRIVE IN 4	2.72	Smaller GW system. WQ issue: fluoride
1520036	GREEN MOBILE HOME PARK	2.76	Smaller GW system. WQ issues: arsenic and fluoride
1520163	ADVENTURES USA	2.76	Larger GW system. WQ issues: fluoride, nitrate
1520179	TOWN AND COUNTRY INC	2.8	Smaller GW system. WQ issues: arsenic ,fluoride and nitrate
1520103	RUDD COUNTRY INC	2.81	Smaller GW system. WQ issues: arsenic and fluoride
1520064	FORT JACKSON MOBILE ESTATES	2.83	Smaller GW system. WQ issues: arsenic , combined uranium, fluoride, gross alpha, nitrate, and sulfate

PWS ID	PWS Name	Distance from Whorton MHP (miles)	Comments/Other Issues
1520180	RIVER SMITHS OUTPOST	2.83	Smaller GW system. WQ issues: arsenic and fluoride
1970003	CRMWA LINE LUBBOCK TO TAHOKA	3	Larger GW/SW system. No WQ issues. <b>Evaluate Further</b>
1520047	WESTERN TERRACE MOBILE HOME PARK	2.85	Smaller GW system. WQ issues: arsenic , combined uranium, fluoride, gross alpha, nitrate, sulfate, and selenium
1520242	LUBBOCK STOCKYARD	3.05	Larger GW system. WQ issues: fluoride
1520155	COUNTRY SQUIRE MHP 2	3.34	Larger GW system. WQ issues: arsenic , fluoride, gross alpha and nitrate
1520239	STONEGATE GOLF COURSE	3.51	Smaller GW system. WQ issue: fluoride
1520222	COOPER DRIVE IN	3.53	Smaller GW system. WQ issues: arsenic and fluoride
1520243	TALENT PLUS	3.64	Smaller GW system. WQ issues: fluoride, nitrate and total nitrate
1520025	BUSTERS MOBILE HOME PARK	4.04	Smaller GW system. WQ issues: arsenic, fluoride and nitrate
1520122	LUBBOCK COOPER ISD	4.75	Larger GW system. WQ issues: arsenic and fluoride
1520203	SUN COUNTRY FOOD MART 1599	5.37	Smaller GW system. WQ issues: fluoride and nitrate
1520135	PINKIES MINI MART 53	5.61	Smaller GW system. WQ issues: nitrate and sulfate
1520128	COUNTY LINE BAR B Q	5.73	Smaller GW system. WQ issues: arsenic and nitrate
1520138	XPOSE CLUB	5.78	Smaller GW system. WQ issues: arsenic, fluoride and nitrate
1520211	TEXIN ENTERPRISES	5.79	Larger GW system. WQ issues: arsenic, fluoride, gross alpha and nitrate
1520027	WAGON WHEEL MOBILE VILLAGE HOME PR	5.9	Larger GW system. WQ issues: arsenic and fluoride
1520245	NIBBLES	6.2	Smaller system. WQ issues: arsenic, fluoride and nitrate
1520022	SYCAMORE PARK MOBILE ESTATES	6.21	Smaller GW system. WQ issue: arsenic
1520232	FULLER MOBILE HOME PARK	6.57	Larger GW system. WQ issues: arsenic (M)
1520006	LUBBOCK COUNTY WCID 1	6.93	Larger GW system. WQ issues: nitrate and sulfate
1520208	BERNARDS LIQUOR STORE	6.95	Smaller GW system. WQ issues: arsenic, fluoride and sulfate
1520217	SOUTHWEST GARDEN WATER	7.15	Larger GW system. WQ issues: arsenic and fluoride
1520046	WILDWOOD MOBILE HOME VILLAGE	7.25	Larger GW system. WQ issues: arsenic, gross alpha and nitrate
1520204	PINKIES MINI MART 51	7.44	Smaller GW system. WQ issues: nitrate
1520026	FAMILY COMMUNITY CENTER MHP	7.66	Smaller GW system. WQ issues: gross alpha, nitrate and sulfate
1520148	LONE STAR MHP	7.96	Larger GW system. WQ issues: arsenic, gross alpha, nitrate and sulfate
1520210	APPLES PIZZA DELI	7.96	Smaller GW system. WQ issues: nitrate and sulfate
1520227	SOUTHWEST SPORTS PLEX	8.02	Larger GW system. WQ issue: fluoride
1520080	FRANKLIN WATER SERVICE COMPANY	8.1	Larger GW system. WQ issues: arsenic, nitrate and sulfate
1520157	TEXAS WATER RAMPAGE INC	8.16	Larger GW system. WQ issues: arsenic and fluoride
1520056	RANSOM CANYON TOWN OF	8.45	Larger GW system. WQ issues. Lack of adequate WQ data.

PWS ID	PWS Name	Distance from Whorton MHP (miles)	Comments/Other Issues
1520235	GOULDS PUMPS INC	8.95	Larger GW system. WQ issues: arsenic, fluoride, nitrate, selenium and sulfate
1520238	ALL AMERICAN CHEVROLET	9.01	Smaller GW system. WQ issues: arsenic and fluoride
1520219	CHRISTIAN LIFE CENTER	9.08	Larger GW system. WQ issues: gross alpha and sulfate
1520185	LUBBOCK RV PARK	9.19	Smaller GW system. WQ issue: nitrate
1520199	WOLFFORTH PLACE	9.45	Larger GW system. WQ issues: Arsenic, fluoride and selenium
1520072	TEXAS BOYS RANCH INC	9.83	Larger GW system. WQ issues: arsenic, gross alpha, selenium

1 WQ = water quality  
2 GW = groundwater  
3 SW = surface water

4 After the PWSs in Table 4.1 with water quality problems were eliminated from further  
5 consideration, the remaining PWSs were screened by proximity to Whorton MHP PWS and  
6 sufficient total production capacity for selling or sharing water. Based on the initial screening  
7 summarized in Table 4.1, two alternatives were selected for further evaluation. These  
8 alternatives are summarized in Table 4.2. The first alternative is a connection to the City of  
9 Lubbock distribution system that is within a half-mile of the study system. The second  
10 alternative is a direct connection to the Canadian River Municipal Water Authority (CRMWA)  
11 pipeline that runs between Lubbock and Tahoka. Descriptions of both the City of Lubbock and  
12 the CRMWA follow Table 4.2.

13 **Table 4.2 Public Water Systems within the Vicinity of the**  
14 **Whorton MHP PWS Selected for Further Evaluation**

PWS ID	PWS Name	Pop	Connections	Total Production (mgd)	Avg Daily Usage (mgd)	Approx. Dist. from Whorton MHP (miles)	Comments/Other Issues
1520002	CITY OF LUBBOCK	223838	81893	156.34	37.979	0.25	Larger SW/GW system. No WQ issues
1970003	CRMWA LINE LUBBOCK TO TAHOKA	199,144	72,750	57.938	35.666	3.0	Large SW/GW system that has limited excess capacity. Option involves connecting to an aqueduct located between Lubbock and Tahoka. Would require CRMWA approval before considering.

15 WQ = water quality  
16 GW = groundwater  
17 SW = surface water

18

#### 1 **4.2.1.1 City of Lubbock Water System**

2 The City of Lubbock PWS produces an average of 38 to 40 mgd for the City of Lubbock  
3 and five surrounding small municipalities with a total production capacity of 156 mgd. The  
4 service pump capacity can meet a peak demand of over 291 mgd. In addition to treating water  
5 for the City of Lubbock distribution system, the Lubbock water treatment plant treats about 6  
6 MGD on average for the six CRMWA member cities receiving treated water from the City of  
7 Lubbock.

8 The City of Lubbock receives water from two sources, the CRMWA and the Bailey  
9 County well field. Additional details on the CRMWA are provided in a separate description.  
10 As a member of the 11-City agreement with the CRMWA, the City of Lubbock is responsible  
11 for receiving raw water from the Lake Meredith/Roberts County well field located 160 miles  
12 north of Lubbock and treating the water. In 2008, Lake Meredith was at 8 percent of capacity.

13 A CRMWA aqueduct distributes the treated water to six other PWSs: Levelland,  
14 Brownfield, Slaton, Tahoka, O'Donnell, and Lamesa. The majority of City of Lubbock water  
15 supply comes from the CRMWA with the secondary supply being the Bailey County well field  
16 located 60 miles northwest of Lubbock. The city has water rights to 82,000 surface acres at the  
17 Bailey County well field. The water received from Bailey County is treated at the central  
18 station in Bailey County before it enters the pipeline leading to Lubbock. As the water reaches  
19 Lubbock, it enters directly into the distribution system predominantly in the northwest section  
20 of Lubbock. It should be noted that the City of Lubbock normally utilizes its total annual water  
21 allocation from CRMWA. If Lubbock needs additional water, its supply is supplemented with  
22 water from the Bailey County well field. The well field consists of 150 wells capable of  
23 producing 50 MGD total (pipeline is limited to 40 mgd). In 2006, the City of Lubbock pumped  
24 an average of 9.3 MGD from the Bailey County well field. However, most of this water was  
25 pumped during the summer months. At peak flows, the pipeline is at near capacity.

26 In addition to the population of Lubbock, five cities are connected to the City of Lubbock  
27 distribution system. Shallowater and Reese Redevelopment Authority, located northwest and  
28 west of Lubbock, have had contracts with the city for more than 30 years to receive water  
29 predominantly originating in Bailey County. The contract allows up to the equivalent of 5  
30 percent of what the city consumes each year. After determining that city wastewater disposal  
31 practices had contaminated Buffalo Springs and Ransom Canyon groundwater supplies, the  
32 City of Lubbock dedicated another half billion gallons of water per year to each of those  
33 communities. Buffalo Springs and Ransom Canyon are located east of Lubbock and receive  
34 water mostly originating from Lake Meredith and the Roberts County well field. A fifth city,  
35 Littlefield, located northwest of the city has a water line connected to the Bailey County  
36 pipeline for an emergency supply of water over a 72-hour period. Additionally, Lubbock-  
37 Cooper Independent School District can buy up to 18.3 million gallons a year, and the City  
38 Council just approved certain supplies for residents around Lake Alan Henry. The decision to  
39 add these five cities to the City of Lubbock water supply was a decision made by the Lubbock  
40 City Council.

1 Future plans for the City of Lubbock water supply system call for construction of the  
2 necessary infrastructure to supply water to Lubbock from Lake Alan Henry located 65 miles  
3 southeast of Lubbock and construction of a new reservoir through the permit held by the White  
4 River Water Supply Corporation. Lake Alan Henry is the largest project undertaken by the city  
5 at \$230 million. Both projects are still in the preliminary engineering phase. The amount of  
6 water available from this system will be staged into the existing Lubbock system over several  
7 years to match Lubbock’s needs. The system is estimated to be operating in 2012.

8 Only government entities that choose to be incorporated under the strictest guidelines or  
9 for which Lubbock is responsible for their adverse water conditions will be considered at this  
10 time. Although Lubbock currently does not have water to share, it may be part of a regional  
11 solution where it may play the largest role.

#### 12 **4.2.1.2 Canadian River Municipal Water Authority**

13 The CRMWA was formed over 50 years ago by a group of Panhandle communities to  
14 provide drinking water from Lake Meredith. The CRMWA currently has contracts to provide  
15 water to 11 member cities in west Texas, including Amarillo, Borger, Brownfield, Lamesa,  
16 Levelland, Lubbock, O’Donnell, Pampa, Plainview, Slaton, and Tahoka. A pipeline ranging in  
17 size from 8 feet to 1.5 feet is used to convey raw water approximately 160 miles from Lake  
18 Meredith and a well field in Roberts County (40 miles northeast of Lake Meredith) to the  
19 Lubbock water treatment plant. Along the pipeline route, four cities (Amarillo, Borger, Pampa,  
20 and Plainview) receive their allocated water supply and each of these four cities treats their  
21 own water. The rest of the untreated water for the other seven member cities goes to the City  
22 of Lubbock water treatment plant. The treated water is pumped into the City of Lubbock  
23 distribution system and to the other six member cities. The raw water line flows by gravity  
24 from Amarillo to the Lubbock treatment plant. The treated water leaving the City of Lubbock  
25 water treatment plant flows by gravity in the east leg pipeline to Lamesa; however, the water in  
26 the west leg to Levelland and Brownfield is pumped.

27 The current volume of water delivered annually by the CRMWA to the member cities is  
28 85,000 acre-feet (35,000 acre-feet from Lake Meredith and 50,000 acre-feet from the well field  
29 in Roberts County). The available water volume is set by the CRMWA and may fluctuate  
30 during the year, but the volume is based on water levels in the well field and in the lake. The  
31 provision for each member city is based on a contracted percentage of the available acre-feet.  
32 The City of Lubbock is under contract to receive 41.6 mgd from the CRMWA, and the City of  
33 Lubbock water treatment plant treats an additional 5.4 mgd for the other six member cities  
34 receiving treated water from the City of Lubbock water treatment plant. When the CRMWA  
35 program was established in the 1960s, the system was designed to accommodate the 11  
36 member cities at the time and there were no plans to add additional member cities.

37 If a member city has excess water, that particular city can decide through its city  
38 council how much water it would like to allocate to a non-member PWS. If the non-member  
39 city is to receive water directly from a member city’s distribution system, then the CRMWA  
40 would not be involved. However, if a non-member is requesting to receive the water  
41 (essentially a portion of a member city’s allocation) via a direct line from the CRMWA line,

1 then the non-member city must get approval from the CRMWA and the 11 member cities for  
2 distribution of water to the non-member PWS. The non-member PWS would be responsible  
3 for financing the installation of the pipeline to the CRMWA treated water line from Lubbock.  
4 The CRMWA would be involved throughout the process of a non-member PWS applying for,  
5 securing access to, and eventually receiving water through the CRMWA system.

#### 6 **4.2.2 Potential for New Groundwater Sources**

##### 7 **4.2.2.1 Installing New Compliant Wells**

8 Developing new wells or well fields is recommended, provided good quality groundwater  
9 available in sufficient quantity can be identified. Since a number of water systems in the area  
10 have water quality problems, it should be possible to share in the cost and effort of identifying  
11 compliant groundwater and constructing well fields.

12 Installation of a new well in the vicinity of the system intake point is likely to be an  
13 attractive option provided compliant groundwater can be found, since the PWS is already  
14 familiar with operation of a water well. As a result, existing nearby wells with good water  
15 quality should be investigated. Re-sampling and test pumping would be required to verify and  
16 determine the quality and quantity of water at those wells.

17 The use of existing wells should probably be limited to use as indicators of groundwater  
18 quality and availability. If a new groundwater source is to be developed, it is recommended  
19 that a new well or wells be installed instead of using existing wells. This would ensure well  
20 characteristics are known and meet standards for drinking water wells.

21 Some of the alternatives suggest new wells be drilled in areas where existing wells have  
22 acceptable water quality. In developing the cost estimates, Parsons assumed the aquifer in  
23 these areas would produce the required amount of water with only one well. Site investigations  
24 and geological research, which are beyond the scope of this study, could indicate whether the  
25 aquifer at a particular site and depth would provide the amount of water needed or if more than  
26 one well would need to be drilled in separate areas.

##### 27 **4.2.2.2 Results of Groundwater Availability Modeling**

28 In Lubbock County, groundwater is available from two sources, the relatively shallow  
29 Ogallala aquifer, and the underlying Edwards-Trinity (High Plains) aquifer. The Ogallala  
30 provides drinking water to most of the communities in the Texas panhandle, as well as  
31 irrigation water. The Edwards-Trinity (High Plains) is a lower yield aquifer used almost  
32 exclusively as an irrigation water source.

33 Two wells operated by the PWS are completed in the southern Ogallala Aquifer, both at a  
34 depth of 143 feet. A search of registered wells was conducted using TCEQ's Public Water  
35 Supply database to assess groundwater sources utilized within a 10-mile radius of the PWS.  
36 The search indicated that all domestic and public supply wells located within a 10 miles from  
37 the Whorton MHP PWS also withdraw groundwater from the Ogallala; this aquifer is also

1 extensively used in the PWS vicinity as a source of irrigation water and industrial use. A few  
2 active irrigation and industrial wells are also completed in the Edwards-Trinity (High Plains)  
3 aquifer. No domestic or public supply wells pump water from this aquifer.

#### 4 *Groundwater Supply*

5 The Ogallala is the largest aquifer in the United States. The aquifer outcrop underlies  
6 eastern New Mexico and much of the Texas High Plains region, extending eastward over the  
7 entire Lubbock County. The Ogallala provides significantly more water for users than any  
8 other aquifer in the state, and is used primarily for irrigation. The aquifer saturated thickness  
9 ranges up to an approximate depth of 600 feet. Supply wells have an average yield of  
10 approximately 500 gal/min, but higher yields, up to 2,000 gal/min, are found in previously  
11 eroded drainage channels filled with coarse-grained sediments (TWDB 2007).

12 Water level declines in excess of 300 feet have occurred in several aquifer areas over the  
13 last decades. Over a 50-year planning period, the 2007 Texas Water Plan anticipates a water  
14 supply depletion of more than 40 percent, from 5,968,260 AFY projected for the year 2010, to  
15 3,534,124 AFY by the year 2060. Nearly 95 percent of the groundwater pumped from the  
16 Ogallala Aquifer is used for irrigated agriculture.

#### 17 *Groundwater Availability*

18 Regional groundwater withdrawal in the Texas High Plains region is extensive and likely  
19 to remain near current levels over the next decades. The 2007 State Water Plan indicates that  
20 in Lubbock County, without implementation of additional water management strategies, the  
21 increasing water demand will exceed projected water supply estimates. For the 50-year  
22 planning period ending in 2060, the additional water need will be 112,370 AFY. Most  
23 additional water needs would be for irrigation, but a substantial component, 16,063 AFY by the  
24 year 2060, would be associated with municipal supplies and other uses.

25 A GAM developed for the Ogallala aquifer simulated historical conditions and provided  
26 long-term groundwater projections (Blandford et al., 2003). Predictive simulations using the  
27 GAM model indicated that, if estimated future withdrawals are realized, aquifer water levels  
28 could decline to a point at which significant regions currently practicing irrigated agriculture  
29 could be essentially dewatered by 2050. The 2007 State Water Plan, however, indicates that  
30 the rate of decline has slowed relative to previous decades, and water levels have risen in a few  
31 areas.

32 The GAM model predicted the most critical conditions for Cochran, Hockley, Lubbock,  
33 Yoakum, Terry, and Gaines Counties where the simulated drawdown could exceed 100 feet.  
34 For Lubbock County, the simulated drawdown by the year 2050 would be within a typical 50 to  
35 100 feet range (Blandford et al., 2003). The Ogallala aquifer GAM was not run for the PWS  
36 because anticipated use would represent a minor addition to regional withdrawal conditions,  
37 beyond the spatial resolution of the GAM model.

### 1 **4.2.3 Potential for New Surface Water Sources**

2 There is a minimum potential for development of new surface water sources for the PWS  
3 because water availability is very limited at the county level, and within the site vicinity.

4 The PWS is located in the upper reach of the Brazos Basin which has the largest average  
5 annual flow of any river in the State. The Texas State Water Plan, updated in 2007 by the  
6 TWDB, estimates that the average yield over the entire basin is 3.2 inches per year. Water  
7 rights are assigned primarily to municipal and industrial uses (49% and 31%, respectively). In  
8 the upper basin, a significant increase demand for surface water use is anticipated due to the  
9 decline in groundwater supply from the Ogallala Aquifer. Despite the increasing demand, the  
10 2007 State Water Plan anticipates a steadily increase of basin water supply (1,595,000 acre-feet  
11 per year [AFY] in the year 2010) over the next 50 years, as several proposed long-term  
12 management strategies are implemented along the Brazos Basin.

13 In Lubbock County, where the PWS is located, over 90 percent of the water supply is used  
14 for irrigation, largely supported by groundwater from the Ogallala Aquifer, and to a lesser  
15 extent municipal water use. The 2007 State Water Plan indicates that in Lubbock County,  
16 without implementation of additional water management strategies, the increasing water  
17 demand will exceed projected water supply estimates. For the 50-year planning period ending  
18 in 2060, the additional water need will be 112,370 AFY. Most additional water needs would be  
19 for irrigation, but a substantial component, 16,063 AFY by the year 2060, would be associated  
20 with municipal supplies and other uses.

21 The TWDB developed a surface water availability model for the Brazos Basin as a tool to  
22 determine, at a regional level, the maximum amount of water available during the drought of  
23 record over the simulation period (regardless of whether the supply is physically or legally  
24 available). For the PWS vicinity, simulation data indicate that there is a low availability of  
25 surface water for new uses. Surface water availability maps were developed by TCEQ for the  
26 Brazos Basin, illustrating percent of months of flow per year. Availability maps indicate that in  
27 the site vicinity, and over all of Lubbock County, unappropriated flows for new applications  
28 are typically available between 25 and 50 percent of the time. This availability is inadequate  
29 for development of new municipal water supplies as a 100 percent year-round availability is  
30 required by TCEQ for new surface water source permit applications.

### 31 **4.2.4 Options for Detailed Consideration**

32 The initial review of alternative sources of water results in the following options for more-  
33 detailed consideration:

- 34 1. Lubbock Public Water System. A pipeline would be constructed from the City of  
35 Lubbock to Whorton MHP (Alternative WT-1).
- 36 2. CRMWA Water Line from Lubbock to Tahoka. A pipeline would be constructed  
37 from the CRMWA main pipeline that conveys treated water from the Lubbock  
38 treatment plant to the City of Tahoka to Whorton MHP (Alternative WT-2).

- 1           3. New Wells at 10, 5, and 1 mile. Installing a new well within 10, 5, or 1 mile of the  
2           Whorton MHP PWS that may produce compliant water in place of the water  
3           produced by the existing active wells (Alternatives WT-3, WT-4, and WT-5).

#### 4   **4.3    TREATMENT OPTIONS**

##### 5   **4.3.1   Centralized Treatment Systems**

6           Centralized treatment of the well water is identified as a potential option. Both RO and  
7           EDR could be potentially applicable. The central RO treatment alternative is Alternative WT-  
8           6, and the central EDR treatment alternative is Alternative WT-7.

##### 9   **4.3.2   Point-of-Use Systems**

10          POU treatment using RO technology is valid for arsenic and fluoride removal. The POU  
11          treatment alternative is WT-8.

##### 12   **4.3.3   Point-of-Entry Systems**

13          POE treatment using RO technology is valid for arsenic and fluoride removal. The POE  
14          treatment alternative is WT-9.

#### 15   **4.4    BOTTLED WATER**

16          Providing bottled water is considered an interim measure to be used until a compliance  
17          alternative is implemented. Even though the community is small and people know each other;  
18          it would be reasonable to require a quarterly communication advising customers of the need to  
19          take advantage of the bottled water program. An alternative to providing delivered bottled  
20          water is to provide a central, publicly accessible dispenser for treated drinking water.  
21          Alternatives addressing bottled water are WT-10, WT-11, and WT-12.

#### 22   **4.5    ALTERNATIVE DEVELOPMENT AND ANALYSIS**

23          A number of potential alternatives for compliance with the MCL for arsenic and fluoride  
24          have been identified. Each of the potential alternatives is described in the following  
25          subsections. It should be noted that the cost information given is the capital cost and change in  
26          O&M costs associated with implementing the particular alternative. Appendix C contains cost  
27          estimates for the compliance alternatives. These compliance alternatives represent a range of  
28          possibilities, and a number of them are likely not feasible. However, all have been presented to  
29          provide a complete picture of the range of alternatives considered. It is anticipated that a PWS  
30          will be able to use the information contained herein to select the most attractive alternative(s)  
31          for more detailed evaluation and possible subsequent implementation.

##### 32   **4.5.1   Alternative WT-1: Purchase Treated Water from the City of Lubbock**

33          This alternative involves purchasing potable water from the City of Lubbock, which will  
34          be used to supply the Whorton MHP PWS. The City of Lubbock currently has sufficient

1 excess capacity for this alternative to be feasible, although current City policy only allows  
2 drinking water to be provided to areas annexed by the City. It is assumed that Whorton MHP  
3 would obtain all its water from the City of Lubbock.

4 This alternative would require construction of a pipeline from a City of Lubbock water  
5 main to two new 5,000-gallon storage tanks and service pump sets at the existing intake points  
6 for Whorton MHP. The required pipeline would be 4-inches in diameter, approximately  
7 0.5 miles long, starting from the City of Lubbock water line at the intersection of East 82<sup>nd</sup>  
8 Street and County Road 2400.

9 By definition this alternative involves regionalization, since Whorton MHP would be  
10 obtaining drinking water from an existing larger supplier. Also, other PWSs near Whorton  
11 MHP are in need of compliant drinking water and could share in implementation of this  
12 alternative.

13 The estimated capital cost for this alternative includes constructing the pipeline, storage  
14 tanks, building, and distribution pumps. The estimated O&M cost for this alternative includes  
15 the purchase price for the treated water minus the cost related to current operation of the  
16 Whorton MHP's wells, plus maintenance cost for the pipeline, and power and O&M labor and  
17 materials for the pump station. The estimated capital cost for this alternative is \$439,200, with  
18 an estimated annual O&M cost of \$28,200. If the purchased water was used for blending rather  
19 than for the full water supply, the annual O&M cost for this alternative could be reduced  
20 because of reduced pumping costs and reduced water purchase costs. However, additional  
21 costs would be incurred for equipment to ensure proper blending, and additional monitoring to  
22 ensure the finished water is compliant.

23 The reliability of adequate amounts of compliant water under this alternative should be  
24 good. The City of Lubbock provides treated surface water on a large scale, facilitating  
25 adequate O&M resources. From the perspective of the Whorton MHP PWS, this alternative  
26 would be characterized as easy to operate and repair, since O&M and repair of pipelines and  
27 pumps are well understood. If the decision were made to perform blending then the operational  
28 complexity would increase.

29 The feasibility of this alternative is dependent on an agreement being reached with the City  
30 of Lubbock to purchase treated drinking water.

#### 31 **4.5.2 Alternative WT-2: Purchase Treated Water from the CRMWA**

32 This alternative involves purchasing compliant water from the CRMWA, which would be  
33 used to supply Whorton MHP. As previously stated, Whorton MHP must get approval from  
34 the CRMWA and 11 member cities to purchase water.

35 This alternative would require construction of a pump station and a 5,000-gallon feed tank  
36 at a point adjacent to CRMWA's main distribution line, and a pipeline from the feed tank to the  
37 existing intake point for Whorton MHP, where two new 5,000-gallon storage tanks and service  
38 pumps set would be installed.

1 A pump station would be required to overcome pipe friction and the elevation differences  
2 between the feed tank and Whorton MHP. The required pipeline would be 4 inches in diameter  
3 and would follow E. 82<sup>nd</sup> Street west from the CRMWA pipeline crossing, near Peach Avenue,  
4 then CR2400 south to E. 86<sup>th</sup> Street and continuing to the Whorton MHP. Using this route, the  
5 length of pipe required would be approximately 3.5 miles. The pipeline would terminate at the  
6 new storage tanks at each Whorton MHP entry points.

7 The pump stations would include two pumps, including one standby, and would be housed  
8 in a building. It is assumed the pumps and piping would be installed with capacity to meet all  
9 water demand for the Whorton MHP.

10 By definition this alternative involves regionalization, since Whorton MHP would be  
11 obtaining drinking water from an existing larger supplier. Also, other PWSs near Whorton  
12 MHP are in need of compliant drinking water and could share in implementation of this  
13 alternative.

14 The estimated capital cost for this alternative includes constructing the pipeline, pump  
15 station and feed tank, storage tanks, and pump houses. The estimated O&M cost for this  
16 alternative includes the purchase price for the treated water minus the cost the Whorton MHP  
17 currently pays to operate its well field, plus maintenance cost for the pipeline, and power and  
18 O&M labor and materials for the pump station. The estimated capital cost for this alternative is  
19 \$766,100, with an estimated annual O&M cost of \$54,600. If the purchased water was used for  
20 blending rather than for the full water supply, the annual O&M cost for this alternative could  
21 be reduced because of reduced pumping costs and reduced water purchase costs. However,  
22 additional costs would be incurred for equipment to ensure proper blending, and additional  
23 monitoring to ensure the finished water is compliant.

24 The reliability of adequate amounts of compliant water under this alternative should be  
25 good. The CRMWA has adequate O&M resources. From the perspective of the Whorton  
26 MHP PWS, this alternative would be characterized as easy to operate and repair, since O&M  
27 and repair of pipelines and pump stations is well understood, and Whorton MHP personnel  
28 currently operate pipelines and pump stations. If the decision were made to perform blending  
29 then the operational complexity would increase.

30 The feasibility of this alternative is dependent on an agreement being reached between  
31 Whorton MHP, the CRMWA, and 11 member cities to purchase compliant drinking water.

### 32 **4.5.3 Alternative WT-3: New Well at 10 miles**

33 This alternative consists of installing one new well within 10 miles of the Whorton MHP  
34 that would produce compliant water in place of the water produced by the existing wells. At  
35 this level of study, it is not possible to positively identify an existing well or the location where  
36 a new well could be installed.

37 This alternative would require constructing one new 300-foot well, a new pump station  
38 with a 5,000-gallon feed tank near the new well, an additional two pump stations and 5,000

1 gallon feed tanks along the pipeline, and a pipeline from the new well/feed tank to two new  
2 5,000-gallon storage tanks with two service pumps installed within pump houses near the  
3 existing intake points for the Whorton MHP system. The pump stations and feed tanks would  
4 be necessary to overcome pipe friction and changes in land elevation. For this alternative, the  
5 pipeline is assumed to be approximately 10 miles long, and would be a 4-inches in diameter.

6 Depending on well location and capacity, this alternative could present some options for a  
7 more regional solution. It may be possible to share water and costs with another nearby  
8 system.

9 The estimated capital cost for this alternative includes installing the well, constructing the  
10 pipeline, the pump stations, the storage and feed tanks, service pumps and pump houses. The  
11 estimated O&M cost for this alternative includes O&M for the pipeline and pump stations. The  
12 estimated capital cost for this alternative is \$2.29 million, and the estimated annual O&M cost  
13 for this alternative is \$91,300.

14 The reliability of adequate amounts of compliant water under this alternative should be  
15 good, since water wells, pump stations and pipelines are commonly employed. From the  
16 perspective of the Whorton MHP PWS, this alternative would be similar to operate as the  
17 existing system. Whorton MHP personnel have experience with O&M of wells, pipelines, and  
18 pump stations.

19 The feasibility of this alternative is dependent on the ability to find an adequate existing  
20 well or success in installing a well that produces an adequate supply of compliant water. It is  
21 likely that an alternate groundwater source would not be found on land owned by Whorton  
22 MHP, so landowner cooperation would likely be required.

#### 23 **4.5.4 Alternative WT-4: New Well at 5 miles**

24 This alternative consists of installing one new well within 5 miles of the Whorton MHP  
25 that would produce compliant water in place of the water produced by the existing wells. At  
26 this level of study, it is not possible to positively identify an existing well or the location where  
27 new wells could be installed.

28 This alternative would require constructing one new 300-foot well, a new pump station  
29 with a 5,000 gallon feed tank near the new well, an additional pump station and 5,000 gallon  
30 feed tank along the pipeline, and a pipeline from the new well/feed tank to two new  
31 5,000-gallon storage tanks with two service pumps sets installed within a pump houses near the  
32 existing intake points for the Whorton MHP system. The pump station and feed tank would be  
33 necessary to overcome pipe friction and changes in land elevation. For this alternative, the  
34 pipeline is assumed to be 4-inches in diameter, approximately 5 miles long.

35 Depending on well location and capacity, this alternative could present some options for a  
36 more regional solution. It may be possible to share water and costs with another nearby  
37 system.

1 The estimated capital cost for this alternative includes installing the well, constructing the  
2 pipeline, the pump stations, the storage and feed tanks, service pumps and pump houses. The  
3 estimated O&M cost for this alternative includes O&M for the pipeline and pump station. The  
4 estimated capital cost for this alternative is \$1.28 million, and the estimated annual O&M cost  
5 for this alternative is \$65,200.

6 The reliability of adequate amounts of compliant water under this alternative should be good,  
7 since water wells, pump stations and pipelines are commonly employed. From the perspective  
8 of the Whorton MHP PWS, this alternative would be similar to operate as the existing system.  
9 Whorton MHP personnel have experience with O&M of wells, pipelines and pump stations.

10 The feasibility of this alternative is dependent on the ability to find an adequate existing  
11 well or success in installing a well that produces an adequate supply of compliant water. It is  
12 likely an alternate groundwater source would not be found on land owned by Whorton MHP,  
13 so landowner cooperation would likely be required.

#### 14 **4.5.5 Alternative WT-5: New Well at 1 mile**

15 This alternative consists of installing one new well within 1 mile of the Whorton MHP  
16 PWS that would produce compliant water in place of the water produced by the existing wells.  
17 At this level of study, it is not possible to positively identify an existing well or the location  
18 where a new well could be installed.

19 This alternative would require constructing one new 300-foot well and a pipeline from the  
20 new well to two new 5,000-gallon storage tanks with two service pump sets installed within  
21 pump houses near the existing intake points for the Whorton MHP system. Since the new well  
22 is relatively close, a pump station would not be necessary. For this alternative, the pipeline is  
23 assumed to be 4 inches in diameter, and approximately 1 mile long.

24 Depending on well location and capacity, this alternative could present some options for a  
25 more regional solution. It may be possible to share water and costs with another nearby  
26 system.

27 The estimated capital cost for this alternative includes installing the well, constructing the  
28 pipeline, the storage tanks, and service pumps. The estimated O&M cost for this alternative  
29 includes O&M for the pipeline. The estimated capital cost for this alternative is \$464,200, and  
30 the estimated annual O&M cost for this alternative is \$39,400.

31 The reliability of adequate amounts of compliant water under this alternative should be  
32 good, since water wells and pipelines are commonly employed. From the perspective of the  
33 Whorton MHP PWS, this alternative would be similar to operate as the existing system.  
34 Whorton MHP personnel have experience with O&M of wells, pipelines and pump stations.

35 The feasibility of this alternative is dependent on the ability to find an adequate existing  
36 well or success in installing a well that produces an adequate supply of compliant water. It is

1 possible an alternate groundwater source would not be found on land owned by Whorton MHP,  
2 so landowner cooperation may be required.

#### 3 **4.5.6 Alternative WT-6: Central RO Treatment**

4 This system would continue to pump water from the existing wells, and would treat the  
5 water through two RO systems (one for each entry point) prior to distribution. For this option,  
6 100 percent of the raw water would be treated to obtain compliant water. The RO process  
7 concentrates impurities in the reject stream which would require disposal. It is estimated the  
8 total RO reject generation would be approximately 2,500 gallons per day (gpd) when the  
9 system is operated at the average daily consumption (0.01 mgd).

10 This alternative consists of constructing the RO treatment plants near each of the existing  
11 wells. Each plant is composed of a 350 square foot building with a paved driveway; a skid  
12 with the pre-constructed RO plant; two transfer pumps, a 7,000-gallon tank for storing the  
13 treated water, and a 37,000-gallon pond for storing reject water. The treated water would be  
14 chlorinated and stored in the new treated water tank prior to being pumped into the distribution  
15 system. The existing pressure tanks would continue to be used to accumulate feed water from  
16 the well field. The entire facilities would be fenced.

17 The estimated capital cost for this alternative is \$493,300, and the estimated annual O&M  
18 cost is \$56,200.

19 The reliability of adequate amount of compliant water under this alternative is good, since  
20 RO treatment is a common and well-understood treatment technology. However, O&M efforts  
21 required for the central RO treatment plant may be significant, and O&M personnel would  
22 require training with RO. The feasibility of this alternative is not dependent on the  
23 cooperation, willingness, or capability of other water supply entities.

#### 24 **4.5.7 Alternative WT-7: Central EDR Treatment**

25 The system would continue to pump water from the existing wells, and would treat the  
26 water through two EDR systems (one for each entry point) prior to distribution. For this option  
27 the EDR units would treat the full flow without bypass as the EDR operation can be tailored for  
28 desired removal efficiency. It is estimated the total EDR reject generation would be  
29 approximately 1,600 gpd when the system is operated at the average daily consumption  
30 (0.01 mgd).

31 This alternative consists of constructing the EDR treatment plant near the existing well.  
32 Each EDR plant is composed of a 300 square foot building with a paved driveway; a skid with  
33 the pre-constructed EDR system; two transfer pumps; a 7,000-gallon tank for storing the  
34 treated water, and a 24,000-gallon pond for storing concentrated water. The treated water  
35 would be chlorinated and stored in the new treated water tank prior to being pumped into the  
36 distribution system. The existing pressure tanks would continue to be used to accumulate feed  
37 water from the wells. The entire facility is fenced.

1 The estimated capital cost for this alternative is \$539,600 and the estimated annual O&M  
2 cost is \$54,000.

3 The reliability of adequate amounts of compliant water under this alternative is good, since  
4 EDR treatment is a common and well-understood treatment technology. However, O&M  
5 efforts required for the central EDR treatment plant may be significant, and O&M personnel  
6 would require training with EDR. The feasibility of this alternative is not dependent on the  
7 cooperation, willingness, or capability of other water supply entities.

#### 8 **4.5.8 Alternative WT-8: Point-of-Use Treatment**

9 This alternative consists of the continued operation of the Whorton MHP well field, plus  
10 treatment of water to be used for drinking or food preparation at the point of use to remove  
11 fluoride and arsenic. The purchase, installation, and maintenance of POU treatment systems to  
12 be installed “under the sink” would be necessary for this alternative. Blending is not an option  
13 in this case.

14 This alternative would require installing the POU treatment units in residences and other  
15 buildings that provide drinking or cooking water. Whorton MHP staff would be responsible for  
16 purchase and maintenance of the treatment units, including membrane and filter replacement,  
17 periodic sampling, and necessary repairs. In houses, the most convenient point for installation  
18 of the treatment units is typically under the kitchen sink, with a separate tap installed for  
19 dispensing treated water. Installation of the treatment units in kitchens will require the entry of  
20 Whorton MHP or contract personnel into the houses of customers. As a result, cooperation of  
21 customers would be important for success implementing this alternative. The treatment units  
22 could be installed for access without house entry, but that would complicate the installation and  
23 increase costs.

24 Treatment processes would involve RO. Treatment processes produce a reject waste  
25 stream. The reject waste streams result in a slight increase in the overall volume of water used.  
26 POU systems have the advantage that only a minimum volume of water is treated (only that for  
27 human consumption). This minimizes the size of the treatment units, the increase in water  
28 required, and the waste for disposal. For this alternative, it is assumed the increase in water  
29 consumption is insignificant in terms of supply cost, and that the reject waste stream can be  
30 discharged to the house septic or sewer system.

31 This alternative does not present options for a regional solution.

32 The estimated capital cost for this alternative includes purchasing and installing the POU  
33 treatment systems. The estimated O&M cost for this alternative includes the purchase and  
34 replacement of filters and membranes, as well as periodic sampling and record keeping as  
35 required by the Texas Administrative Code (TAC) (Title 30, Part I, Chapter 290, Subchapter F,  
36 Rule 290.106). The estimated capital cost for this alternative is \$33,000, and the estimated  
37 annual O&M cost for this alternative is \$21,700. For the cost estimate, it is assumed that one  
38 POU treatment unit will be required for each of the 26 connections in the Whorton MHP  
39 system. It should be noted that the POU treatment units would need to be more complex than

1 units typically found in commercial retail outlets to meet regulatory requirements, making  
2 purchase and installation more expensive. Additionally, capital cost would increase if POU  
3 treatment units are placed at other taps within a home, such as refrigerator water dispensers, ice  
4 makers, and bathroom sinks. In school settings, all taps where children and faculty receive  
5 water may need POU treatment units or clearly mark those taps suitable for human  
6 consumption. Additional considerations may be necessary for preschools or other  
7 establishments where individuals cannot read.

8 The reliability of adequate amounts of compliant water under this alternative is fair, since  
9 it relies on the active cooperation of the customers for system installation, use, and  
10 maintenance, and only provides compliant water to single tap within a house. Additionally, the  
11 O&M efforts (including monitoring of the devices to ensure adequate performance) required  
12 for the POU systems will be significant, and the current personnel are inexperienced in this  
13 type of work. From the perspective of the Whorton MHP PWS, this alternative would be  
14 characterized as more difficult to operate owing to the in-home requirements and the large  
15 number of individual units.

16 The feasibility of this alternative is not dependent on the cooperation, willingness, or  
17 capability of other water supply entities.

#### 18 **4.5.9 Alternative WT-9: Point-of-Entry Treatment**

19 This alternative consists of the continued operation of the Whorton MHP well field, plus  
20 treatment of water as it enters residences to remove fluoride and arsenic. The purchase,  
21 installation, and maintenance of the treatment systems at the point of entry to a household  
22 would be necessary for this alternative. Blending is not an option in this case.

23 This alternative would require the installation of the POE treatment units at houses and  
24 other buildings that provide drinking or cooking water. Every building connected to the system  
25 must have a POE device installed, maintained, and adequately monitored. TCEQ must be  
26 assured the system has 100 percent participation of all property and or building owners. A way  
27 to achieve 100 percent participation is through a public announcement and education program.  
28 Example public programs are provided in the document “*Point-of-Use or Point-of-Entry*”  
29 *Treatment Options for Small Drinking Water Systems*” published by USEPA. The property  
30 owner’s responsibilities for the POE device must also be contained in the title to the property  
31 and “run with the land” so subsequent property owners understand their responsibilities  
32 (USEPA 2006).

33 Whorton MHP would be responsible for purchase, operation, and maintenance of the  
34 treatment units, including membrane and filter replacement, periodic sampling, and necessary  
35 repairs. It may also be desirable to modify piping so water for non-consumptive uses can be  
36 withdrawn upstream of the treatment unit. The POE treatment units would be installed outside  
37 the residences, so entry would not be necessary for O&M. Some cooperation from customers  
38 would be necessary for installation and maintenance of the treatment systems.

1 POE treatment for fluoride and arsenic would involve RO. Treatment processes produce a  
2 reject stream that requires disposal. The reject water stream results in a slight increase in  
3 overall volume of water used. POE systems treat a greater volume of water than POU systems.  
4 For this alternative, it is assumed the increase in water consumption is insignificant in terms of  
5 supply cost, and that the backwash reject waste stream can be discharged to the house septic or  
6 sewer system.

7 This alternative does not present options for a regional solution.

8 The estimated capital cost for this alternative includes purchasing and installing the POE  
9 treatment systems. The estimated O&M cost for this alternative includes the purchase and  
10 replacement of filters and membranes, as well as periodic sampling and record keeping. The  
11 estimated capital cost for this alternative is \$395,800, and the estimated annual O&M cost for  
12 this alternative is \$55,800. For the cost estimate, it is assumed that one POE treatment unit will  
13 be required for each of the 26 existing connections to the Whorton MHP system.

14 The reliability of adequate amounts of compliant water under this alternative are fair, but  
15 better than POU systems since it relies less on the active cooperation of the customers for  
16 system installation, use, and maintenance, and compliant water is supplied to all taps within a  
17 house. Additionally, the O&M efforts required for the POE systems will be significant, and the  
18 current personnel are inexperienced in this type of work. From the perspective of the Whorton  
19 MHP PWS, this alternative would be characterized as more difficult to operate owing to the on-  
20 property requirements and the large number of individual units.

21 The feasibility of this alternative is not dependent on the cooperation, willingness, or  
22 capability of other water supply entities.

#### 23 **4.5.10 Alternative WT-10: Public Dispenser for Treated Drinking Water**

24 This alternative consists of the continued operation of the Whorton MHP wells, plus  
25 dispensing treated water for drinking and cooking at a publicly accessible location.  
26 Implementing this alternative would require purchasing and installing a treatment unit where  
27 customers would be able to come and fill their own containers. This alternative also includes  
28 notifying customers of the importance of obtaining drinking water from the dispenser. In this  
29 way, only a relatively small volume of water requires treatment, but customers would be  
30 required to pick up and deliver their own water. Blending is not an option in this case. It  
31 should be noted that this alternative would be considered an interim measure until a compliance  
32 alternative is implemented.

33 Whorton MHP personnel would be responsible for maintenance of the treatment unit,  
34 including media or membrane replacement, periodic sampling, and necessary repairs. The  
35 spent media or membranes will require disposal. This alternative relies on a great deal of  
36 cooperation and action from the customers in order to be effective.

37 This alternative does not present options for a regional solution.

1 The estimated capital cost for this alternative includes purchasing and installing the  
2 treatment system to be used for the drinking water dispenser. The estimated O&M cost for this  
3 alternative includes purchasing and replacing filters and media or membranes, as well as  
4 periodic sampling and record keeping. The estimated capital cost for this alternative is  
5 \$17,800, and the estimated annual O&M cost for this alternative is \$34,600.

6 The reliability of adequate amounts of compliant water under this alternative is fair,  
7 because of the large amount of effort required from the customers and the associated  
8 inconvenience. Whorton MHP has not provided this type of service in the past. From Whorton  
9 MHP's perspective this alternative would be characterized as relatively easy to operate, since  
10 these types of treatment units are highly automated, and there is only one unit.

11 The feasibility of this alternative is not dependent on the cooperation, willingness, or  
12 capability of other water supply entities.

#### 13 **4.5.11 Alternative WT-11: 100 Percent Bottled Water Delivery**

14 This alternative consists of the continued operation of the Whorton MHP wells, but  
15 compliant drinking water will be delivered to customers in containers. This alternative  
16 involves setting up and operating a bottled water delivery program to serve all customers in the  
17 system. It is expected that Whorton MHP would find it most convenient and economical to  
18 contract a bottled water service. The bottle delivery program would have to be flexible enough  
19 to allow the delivery of smaller containers should customers be incapable of lifting and  
20 manipulating 5-gallon bottles. Blending is not an option in this case. It should be noted that  
21 this alternative would be considered an interim measure until a compliance alternative is  
22 implemented.

23 This alternative does not involve capital cost for construction, but would require some  
24 initial costs for system setup, and then ongoing costs to have the bottled water furnished. It is  
25 assumed for this alternative that bottled water is provided to 100 percent of the Whorton MHP  
26 PWS customers.

27 This alternative does not present options for a regional solution.

28 The estimated initial capital cost is for setting up the program. The estimated O&M cost  
29 for this alternative includes program administration and purchase of the bottled water. The  
30 estimated capital cost for this alternative is \$27,000, and the estimated annual O&M cost for  
31 this alternative is \$53,600. For the cost estimate, it is assumed that each person requires one  
32 gallon of bottled water per day.

33 The reliability of adequate amounts of compliant water under this alternative is fair, since  
34 it relies on the active cooperation of customers to order and utilize the water. Management and  
35 administration of the bottled water delivery program will require attention from Whorton MHP.

36 The feasibility of this alternative is not dependent on the cooperation, willingness, or  
37 capability of other water supply entities.

#### 4.5.12 Alternative WT-12: Public Dispenser for Trucked Drinking Water

This alternative consists of continued operation of the Whorton MHP wells, plus dispensing compliant water for drinking and cooking at a publicly accessible location. The compliant water would be purchased from the City of Lubbock, and delivered by truck to a tank at a central location where customers would be able to fill their own containers. This alternative also includes notifying customers of the importance of obtaining drinking water from the dispenser. In this way, only a relatively small volume of water requires treatment, but customers are required to pick up and deliver their own water. Blending is not an option in this case. It should be noted that this alternative would be considered an interim measure until a compliance alternative is implemented.

Whorton MHP would purchase a truck suitable for hauling potable water, and install a storage tank. It is assumed the storage tank would be filled once a week, and that the chlorine residual would be tested for each truckload. The truck would have to meet requirements for potable water, and each load would be treated with bleach. This alternative relies on a great deal of cooperation and action from the customers for it to be effective.

This alternative presents limited options for a regional solution if two or more systems share the purchase and operation of the water truck.

The estimated capital cost for this alternative includes purchasing a water truck and construction of the storage tank to be used for the drinking water dispenser. The estimated O&M cost for this alternative includes O&M for the truck, maintenance for the tank, water quality testing, record keeping, and water purchase. The estimated capital cost for this alternative is \$127,700, and the estimated annual O&M cost for this alternative is \$29,600.

The reliability of adequate amounts of compliant water under this alternative is fair because of the large amount of effort required from the customers and the associated inconvenience. Current personnel have not provided this type of service in the past. From the perspective of Whorton MHP, this alternative would be characterized as relatively easy to operate, but the water hauling and storage would have to be done with care to ensure sanitary conditions.

The feasibility of this alternative is not dependent on the cooperation, willingness, or capability of other water supply entities.

#### 4.5.13 Summary of Alternatives

Table 4.3 provides a summary of the key features of each alternative for Whorton MHP PWS.

1 **Table 4.3 Summary of Compliance Alternatives for Whorton Mobile Home Park PWS**

Alt No.	Alternative Description	Major Components	Capital Cost <sup>1</sup>	Annual O&M Cost	Total Annualized Cost	Reliability	System Impact	Remarks
WT-1	Purchase Water from Lubbock	- 2 storage tanks/service pumps - 0.5-mile pipeline	\$439,200	\$27,100	\$65,400	Good	N	Agreement must be successfully negotiated with the City of Lubbock. Blending may be possible. Costs could possibly be shared with small systems along pipeline route.
WT-2	Purchase Water from CRMWA Lubbock - Tahoka	- Pump station / feed tank - 2 storage tanks/service pumps - 3.5-mile pipeline	\$670,000	\$29,000	\$87,400	Good	N	Agreement must be successfully negotiated with the CRMWA. Blending may be possible. Costs could possibly be shared with small systems along pipeline route.
WT-3	Install new compliant well within 10 miles	- New well - Two new pump stations / feed tanks - 2 storage tanks/service pumps - 10-mile pipeline	\$2,286,200	\$91,300	\$290,600	Good	N	May be difficult to find well with good water quality. Costs could possibly be shared with small systems along pipeline route.
WT-4	Install new compliant well within 5 Miles	- New well - Two storage tanks/service pumps - 5-mile pipeline	\$1,284,300	\$65,200	\$177,200	Good	N	May be difficult to find well with good water quality. Costs could possibly be shared with small systems along pipeline route.
WT-5	Install new compliant well within 1 Mile	- New well - 2 storage tanks/service pumps - 1-mile pipeline	\$464,200	\$39,400	\$79,800	Good	N	May be difficult to find well with good water quality.
WT-6	Continue operation of Whorton MHP well field with central RO treatment	- Central RO treatment plant	\$493,300	\$56,200	\$99,200	Good	T	Costs could possibly be shared with nearby small systems.
WT-7	Continue operation of Whorton MHP well field with central EDR treatment	-Central EDR treatment plant	\$539,600	\$54,000	\$101,100	Good	T	Costs could possibly be shared with nearby small systems.
WT-8	Continue operation of Whorton MHP well field, and POU treatment	- POU treatment units.	\$33,000	\$21,700	\$24,600	Fair	T, M	Only one compliant tap in home. Cooperation of residents required for installation, maintenance, and testing.
WT-9	Continue operation of Whorton MHP well field, and POE treatment	- POE treatment units.	\$395,800	\$55,800	\$90,300	Fair (better than POU)	T, M	All home taps compliant and less resident cooperation required.

Alt No.	Alternative Description	Major Components	Capital Cost <sup>1</sup>	Annual O&M Cost	Total Annualized Cost	Reliability	System Impact	Remarks
WT-10	Continue operation of Whorton MHP well field, but furnish public dispenser for treated drinking water	- Water treatment and dispenser unit	\$17,800	\$34,600	\$36,200	Fair/interim measure	T	Does not provide compliant water to all taps, and requires a lot of effort by customers.
WT-11	Continue operation of Whorton MHP well field, but furnish bottled drinking water for all customers	- Set up bottled water system	\$27,000	\$53,600	\$55,900	Fair/interim measure	M	Does not provide compliant water to all taps, and requires customers to order and use. Management of program may be significant.
WT-12	Continue operation of Whorton MHP well field, but furnish public dispenser for trucked drinking water	- Construct storage tank and dispenser - Purchase potable water truck	\$127,700	\$29,600	\$40,700	Fair/interim measure	M	Does not provide compliant water to all taps, and requires a lot of effort by customers.

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  - 4
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  - 6
- Notes: N – No significant increase required in technical or management capability  
T – Implementation of alternative will require increase in technical capability  
M – Implementation of alternative will require increase in management capability  
1 – See cost breakdown in Appendix C  
2 – 20-year return period and 6 percent interest

## 1    **4.6    DEVELOPMENT AND EVALUATION OF A REGIONAL SOLUTION**

2        A concept for a regional solution to provide compliant drinking water to PWSs near  
3 Lubbock and surrounding counties was developed and evaluated to investigate whether a large-  
4 scale regional approach might be more cost-effective than each PWS seeking its own solution.  
5 The development and evaluation of the Lubbock Area Regional Solutions is described in  
6 Appendix E. It was found that a regional solution to serving non-compliant PWSs in the  
7 Lubbock area presents a potentially viable solution to an existing problem. A regional system  
8 could be implemented within a cost-per-connection range of \$61/month (\$738/year) to  
9 \$173/month (\$2,079/year), with the actual cost depending on the source and costs of capital  
10 funds needed to build a regional system.

## 11   **4.7    COST OF SERVICE AND FUNDING ANALYSIS**

12        To evaluate the financial impact of implementing the compliance alternatives, a 30-year  
13 financial planning model was developed. This model can be found in Appendix D. The  
14 financial model is based on estimated cash flows, with and without implementation of the  
15 compliance alternatives. Data for such models are typically derived from established budgets,  
16 audited financial reports, published water tariffs, and consumption data. Whorton MHP is a  
17 facility with 26 connections, serving a population of approximately 60. Information that was  
18 used to complete the financial analysis was based on estimated revenues and expenses. Water  
19 usage for the Whorton MHP was estimated using a usage rate of 90 gallons per day per capita.

20        This analysis will need to be performed in a more detailed fashion and applied to  
21 alternatives deemed attractive and worthy of more detailed evaluation. A more detailed  
22 analysis should include additional factors such as:

- 23        • Cost escalation,
- 24        • Price elasticity effects where increased rates may result in lower water consumption,
- 25        • Costs for other system upgrades and rehabilitation needed to maintain compliant  
26        operation.

### 27   **4.7.1   Whorton Mobile Home Park Financial Data**

28        Expense records for Whorton MHP were reviewed, and revenue was estimated based on  
29 the annual maintenance fee of similar size PWS.

### 30   **4.7.2   Current Financial Condition**

#### 31   **4.7. 2.1 Cash Flow Needs**

32        For the analysis, average annual water bill residential customers of Whorton MHP is  
33 estimated to be \$180, or approximately 0.6 per cent of the annual household income of  
34 \$30,524. It is unclear whether revenues are sufficient to fund operations. Rates will likely  
35 need to be raised to implement a compliance alternative.

## 1 **4.7.2.2 Ratio Analysis**

### 2 *Current Ratio*

3 The Current Ratio for the Whorton MHP water system could not be determined due to lack  
4 of necessary financial data.

### 5 *Debt to Net Worth Ratio*

6 A Debt-to-Net-Worth Ratio also could not be determined owing to lack of the necessary  
7 financial data.

### 8 *Operating Ratio*

9 The Operating Ratio could not be determined due to lack of necessary financial data.

## 10 **4.7.3 Financial Plan Results**

11 Each compliance alternative for the Whorton MHP PWS was evaluated, with emphasis on  
12 the impact on affordability (expressed as a percentage of household income), and the overall  
13 increase in water rates necessary to pay for the improvements. Each alternative was examined  
14 under the various funding options described in Section 2.4.

15 Results of the financial impact analysis are provided in Table 4.4 and Figure 4.2.  
16 Table 4.4 and Figure 4.2 present rate impacts assuming that revenues match expenses, without  
17 funding reserve accounts, and that operations and implementation of compliance alternatives  
18 are funded with revenue and are not paid for from reserve accounts. Figure 4.2 provides a bar  
19 chart that, in terms of the yearly billing to an average customer, shows the following:

- 20 • Current annual average bill,
- 21 • Projected annual average bill including rate increase, if needed, to match existing  
22 expenditures, and
- 23 • Projected annual bill including rate increases needed to fund implementation of a  
24 compliance alternative (this does not include funding for reserve accounts).

25 The two bars shown for each compliance alternative represent the rate changes necessary  
26 for revenues to match total expenditures assuming 100 percent grant funding and 100 percent  
27 loan/bond funding. Most funding options will fall between 100 percent grant and 100 percent  
28 loan/bond funding, with the exception of 100 percent revenue financing. Establishing or  
29 increasing reserve accounts would require an increase in rates. If existing reserves are  
30 insufficient to fund a compliance alternative, rates would need to be raised before  
31 implementing the compliance alternative. This would allow for accumulation of sufficient  
32 reserves to avoid larger but temporary rate increases during the years the compliance  
33 alternative was being implemented.

**Whorton MHP**  
**Table 4.4 Financial Impact on Households**

Alternative	Description		All Revenue	100% Grant	75% Grant	50% Grant	SRF	Bond
1	Purchase Water from Lubbock	Maximum % of MHI	56.3%	4.5%	5.6%	6.7%	8.2%	8.9%
		Percentage Rate Increase Compared to Current	9451%	670%	854%	1037%	1295%	1404%
		Average Annual Water Bill	\$17,191	\$1,386	\$1,716	\$2,047	\$2,511	\$2,707
2	Purchase Water from CRA Lub-Tahoka	Maximum % of MHI	97.5%	7.9%	9.7%	11.6%	14.3%	15.4%
		Percentage Rate Increase Compared to Current	16437%	1233%	1553%	1873%	2323%	2513%
		Average Annual Water Bill	\$29,766	\$2,399	\$2,975	\$3,551	\$4,361	\$4,704
3	New Well at 10 Miles	Maximum % of MHI	301.2%	15.6%	21.5%	27.3%	35.6%	39.1%
		Percentage Rate Increase Compared to Current	50971%	2543%	3539%	4534%	5933%	6525%
		Average Annual Water Bill	\$91,927	\$4,757	\$6,549	\$8,341	\$10,859	\$11,925
4	New Well at 5 Miles	Maximum % of MHI	174.9%	12.3%	15.7%	19.1%	23.9%	25.9%
		Percentage Rate Increase Compared to Current	29562%	1985%	2562%	3139%	3950%	4293%
		Average Annual Water Bill	\$53,392	\$3,753	\$4,792	\$5,830	\$7,289	\$7,907
5	New Well at 1 Mile	Maximum % of MHI	59.5%	5.9%	7.1%	8.2%	9.8%	10.5%
		Percentage Rate Increase Compared to Current	9985%	908%	1102%	1296%	1569%	1684%
		Average Annual Water Bill	\$18,153	\$1,814	\$2,164	\$2,513	\$3,003	\$3,211
6	Central Treatment - RO	Maximum % of MHI	63.1%	8.1%	9.3%	10.5%	12.2%	12.9%
		Percentage Rate Increase Compared to Current	10607%	1267%	1474%	1680%	1969%	2092%
		Average Annual Water Bill	\$19,273	\$2,461	\$2,832	\$3,203	\$3,725	\$3,946
7	Central Treatment - EDR	Maximum % of MHI	69.0%	7.8%	9.1%	10.5%	12.3%	13.1%
		Percentage Rate Increase Compared to Current	11597%	1221%	1447%	1672%	1989%	2123%
		Average Annual Water Bill	\$21,055	\$2,378	\$2,784	\$3,190	\$3,760	\$4,002
8	Point-of-Use Treatment	Maximum % of MHI	5.1%	3.7%	3.8%	3.9%	4.0%	4.0%
		Percentage Rate Increase Compared to Current	772%	531%	544%	558%	578%	586%
		Average Annual Water Bill	\$1,570	\$1,135	\$1,160	\$1,185	\$1,220	\$1,234
9	Point-of-Entry Treatment	Maximum % of MHI	50.8%	8.0%	9.0%	10.0%	11.3%	11.9%
		Percentage Rate Increase Compared to Current	8523%	1258%	1424%	1589%	1821%	1920%
		Average Annual Water Bill	\$15,521	\$2,445	\$2,743	\$3,040	\$3,459	\$3,636
10	Public Dispenser for Treated Drinking Water	Maximum % of MHI	5.3%	5.3%	5.4%	5.4%	5.5%	5.5%
		Percentage Rate Increase Compared to Current	806%	806%	814%	821%	832%	836%
		Average Annual Water Bill	\$1,631	\$1,631	\$1,645	\$1,658	\$1,677	\$1,685
11	Supply Bottled Water to 100% of Population	Maximum % of MHI	7.7%	7.7%	7.8%	7.9%	8.0%	8.0%
		Percentage Rate Increase Compared to Current	1211%	1211%	1222%	1234%	1250%	1256%
		Average Annual Water Bill	\$2,360	\$2,360	\$2,380	\$2,401	\$2,429	\$2,441
12	Central Trucked Drinking Water	Maximum % of MHI	17.1%	4.7%	5.0%	5.3%	5.8%	6.0%
		Percentage Rate Increase Compared to Current	2795%	699%	752%	806%	881%	912%
		Average Annual Water Bill	\$5,212	\$1,438	\$1,534	\$1,630	\$1,765	\$1,822



#### 1 **4.7.4 Evaluation of Potential Funding Options**

2 There are limited funding programs available to entities as described in Section 2.4.  
3 Whorton MHP PWS is most likely to obtain funding from programs administered by the  
4 TWDB. This report contains information that would be used for an application for funding.  
5 Information such as financial analyses, water supply assessment, and records demonstrating  
6 health concerns, failing infrastructure, and financial need, may be required by these agencies.  
7 This section describes the candidate funding agencies and their appropriate programs as well as  
8 information and steps needed to begin the application process.

9 This report should serve to document the existing water quality issues, infrastructure need  
10 and costs, and water system information needed to begin the application process with the  
11 TWDB. Although this report is at the conceptual level, it demonstrates that significant funding  
12 will be needed to meet Safe Drinking Water Standards. The information provided in this report  
13 may serve as the needed documentation to justify a project that may only be possible with  
14 significant financial assistance.

15 The program most available to the privately owned system is the Drinking Water State  
16 Revolving Fund. The DWSRF offers net long-term interest lending rates below the rate the  
17 borrower would receive on the open market for a period of 20 years. A cost-recovery loan  
18 origination charge is imposed to cover the administrative costs of operating the DWSRF, but an  
19 additional interest rate subsidy is offered to offset the charge. The terms of the loan typically  
20 require a revenue or tax pledge. Depending on how the origination charge is handled, interest  
21 rates can be as low as 0.95 percent below market rates with the possibility of additional federal  
22 subsidies for total interest rates 1.95 percent below market rates. Disadvantaged communities  
23 may obtain loans at interest rates between 0 percent and 1 percent.

24 The loan application process has several steps: pre-application, application and  
25 commitment, loan closing, funding and construction monitoring, and any other special  
26 requirements. In the pre-application phase, prospective loan applicants are asked to submit a  
27 brief DWSRF Information Form to the TWDB that describes the applicant’s existing water  
28 facilities, additional facility needs and the nature of projects being considered for meeting those  
29 needs, project cost estimates, and “disadvantaged community” status. The TCEQ assigns a  
30 priority rating that includes an applicant’s readiness to proceed. TWDB staff notify  
31 prospective applicants of their priority rating and encourage them to schedule a pre-planning  
32 conference for guidance in preparing the engineering, planning, environmental, financial, and  
33 water conservation portions of the DWSRF application.

34 Additional information can be found online at the TWDB website under the Assistance  
35 tab, Financial Assistance section, Public Works Infrastructure Construction subsection, and  
36 under the link “Clean Water State Revolving Fund Loan Program.”

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**SECTION 5**  
**REFERENCES**

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**APPENDIX A  
PWS INTERVIEW FORM**

# CAPACITY DEVELOPMENT ASSESSMENT FORM

Prepared By \_\_\_\_\_

Date \_\_\_\_\_

## Section 1. Public Water System Information

1. PWS ID #	<input type="text"/>	2. Water System Name	<input type="text"/>
3. County	<input type="text"/>		
4. Owner	<input type="text"/>	Address	<input type="text"/>
Tele.	<input type="text"/>	E-mail	<input type="text"/>
Fax	<input type="text"/>	Message	<input type="text"/>
5. Admin	<input type="text"/>	Address	<input type="text"/>
Tele.	<input type="text"/>	E-mail	<input type="text"/>
Fax	<input type="text"/>	Message	<input type="text"/>
6. Operator	<input type="text"/>	Address	<input type="text"/>
Tele.	<input type="text"/>	E-mail	<input type="text"/>
Fax	<input type="text"/>	Message	<input type="text"/>
7. Population Served	<input type="text"/>	8. No. of Service Connections	<input type="text"/>
9. Ownership Type	<input type="text"/>	10. Metered (Yes or No)	<input type="text"/>
11. Source Type	<input type="text"/>		
12. Total PWS Annual Water Used	<input type="text"/>		
13. Number of Water Quality Violations (Prior 36 months)			
Total Coliform	<input type="text"/>	Chemical/Radiological	<input type="text"/>
Monitoring (CCR, Public Notification, etc.)	<input type="text"/>	Treatment Technique, D/DBP	<input type="text"/>

**A. Basic Information**

1. Name of Water System:
2. Name of Person Interviewed:
3. Position:
4. Number of years at job:
5. Number of years experience with drinking water systems:
6. Percent of time (day or week) on drinking water system activities, with current position (how much time is dedicated exclusively to the water system, not wastewater, solid waste or other activities):
7. Certified Water Operator (Yes or No):  
  
    If Yes,  
    7a. Certification Level (water):  
  
    7b. How long have you been certified?
8. Describe your water system related duties on a typical day.

**B. Organization and Structure**

1. Describe the organizational structure of the Utility. Please provide an organizational chart. (Looking to find out the governance structure (who reports to whom), whether or not there is a utility board, if the water system answers to public works or city council, etc.)

2. If not already covered in Question 1, to whom do you report?
3. Do all of the positions have a written job description?

3a. If yes, is it available to employees?

3b. May we see a copy?

<b>C. Personnel</b>
---------------------

1. What is the current staffing level (include all personnel who spend more than 10% of their time working on the water system)?
  
2. Are there any vacant positions? How long have the positions been vacant?
  
3. In your opinion, is the current staffing level adequate? If not adequate, what are the issues or staffing needs (how many and what positions)?
  
4. What is the rate of employee turnover for management and operators? What are the major issues involved in the turnover (e.g., operator pay, working conditions, hours)?
  
5. Is the system staffed 24 hours a day? How is this handled (on-site or on-call)? Is there an alarm system to call an operator if an emergency occurs after hours?

**D. Communication**

1. Does the utility have a mission statement? If yes, what is it?
  
2. Does the utility have water quality goals? What are they?
  
3. How are your work priorities set?
  
4. How are work tasks delegated to staff?
  
5. Does the utility have regular staff meetings? How often? Who attends?
  
6. Are there separate management meetings? If so, describe.
  
7. Do management personnel ever visit the treatment facility? If yes, how often?
  
8. Is there effective communication between utility management and state regulators (e.g., NMED)?
  
9. Describe communication between utility and customers.

**E. Planning and Funding**

1. Describe the rate structure for the utility.
2. Is there a written rate structure, such as a rate ordinance? May we see it?
  - 2a. What is the average rate for 6,000 gallons of water?
3. How often are the rates reviewed?
4. What process is used to set or revise the rates?
5. In general, how often are the new rates set?
6. Is there an operating budget for the water utility? Is it separate from other activities, such as wastewater, other utilities, or general city funds?
7. Who develops the budget, how is it developed and how often is a new budget created or the old budget updated?
8. How is the budget approved or adopted?

9. In the last 5 years, how many budget shortfalls have there been (i.e., didn't collect enough money to cover expenses)? What caused the shortfall (e.g., unpaid bills, an emergency repair, weather conditions)?  
  
9a. How are budget shortfalls handled?
10. In the last 5 years how many years have there been budget surpluses (i.e., collected revenues exceeded expenses)?  
  
10a. How are budget surpluses handled (i.e., what is done with the money)?
11. Does the utility have a line-item in the budget for emergencies or some kind of emergency reserve account?
12. How do you plan and pay for short-term system needs?
13. How do you plan and pay for long- term system needs?
14. How are major water system capital improvements funded? Does the utility have a written capital improvements plan?
15. How is the facility planning for future growth (either new hook-ups or expansion into new areas)?
16. Does the utility have and maintain an annual financial report? Is it presented to policy makers?

17. Has an independent financial audit been conducted of the utility finances? If so, how often? When was the last one?
18. Will the system consider any type of regionalization with any other PWS, such as system interconnection, purchasing water, sharing operator, emergency water connection, sharing bookkeeper/billing or other?

<b>F. Policies, Procedures, and Programs</b>
--

1. Are there written operational procedures? Do the employees use them?
2. Who in the utility department has spending authorization? What is the process for obtaining needed equipment or supplies, including who approves expenditures?
3. Does the utility have a source water protection program? What are the major components of the program?
4. Are managers and operators familiar with current SDWA regulations?
5. How do the managers and operators hear about new or proposed regulations, such as arsenic, DBP, Groundwater Rule? Are there any new regulations that will be of particular concern to the utility?
6. What are the typical customer complaints that the utility receives?
7. Approximately how many complaints are there per month?

8. How are customer complaints handled? Are they recorded?
9. (If not specifically addressed in Question 7) If the complaint is of a water quality nature, how are these types of complaints handled?
10. Does the utility maintain an updated list of critical customers?
11. Is there a cross-connection control plan for the utility? Is it written? Who enforces the plan's requirements?
12. Does the utility have a written water conservation plan?
13. Has there been a water audit of the system? If yes, what were the results?
14. (If not specifically answered in 11 above) What is the estimated percentage for loss to leakage for the system?
15. Are you, or is the utility itself, a member of any trade organizations, such as AWWA or Rural Water Association? Are you an active member (i.e., attend regular meetings or participate in a leadership role)? Do you find this membership helpful? If yes, in what ways does it help you?

<b>G. Operations and Maintenance</b>
--------------------------------------

1. How is decision-making authority split between operations and management for the following items:
  - a. Process Control
  - b. Purchases of supplies or small equipment
  - c. Compliance sampling/reporting
  - d. Staff scheduling
  
2. Describe your utility's preventative maintenance program.
  
3. Do the operators have the ability to make changes or modify the preventative maintenance program?
  
4. How does management prioritize the repair or replacement of utility assets? Do the operators play a role in this prioritization process?
  
5. Does the utility keep an inventory of spare parts?
  
6. Where does staff have to go to buy supplies/minor equipment? How often?
  - 6a. How do you handle supplies that are critical, but not in close proximity (for example if chlorine is not available in the immediate area or if the components for a critical pump are not in the area)

7. Describe the system's disinfection process. Have you had any problems in the last few years with the disinfection system?

7a. Who has the ability to adjust the disinfection process?

8. How often is the disinfectant residual checked and where is it checked?

8a. Is there an official policy on checking residuals or is it up to the operators?

9. Does the utility have an O & M manual? Does the staff use it?

10. Are the operators trained on safety issues? How are they trained and how often?

11. Describe how on-going training is handled for operators and other staff. How do you hear about appropriate trainings? Who suggests the trainings – the managers or the operators? How often do operators, managers, or other staff go to training? Who are the typical trainers used and where are the trainings usually held?

12. In your opinion is the level of your on-going training adequate?

13. In your opinion is the level of on-going training for other staff members, particularly the operators, adequate?

14. Does the facility have mapping of the water utility components? Is it used on any routine basis by the operators or management? If so, how is it used? If not, what is the process used for locating utility components?
15. In the last sanitary survey, were any deficiencies noted? If yes, were they corrected?
16. How often are storage tanks inspected? Who does the inspection?
  - 16a. Have you experienced any problems with the storage tanks?

<b>H. SDWA Compliance</b>
---------------------------

1. Has the system had any violations (monitoring or MCL) in the past 3 years? If so, describe.
2. How were the violations handled?
3. Does the system properly publish public notifications when notified of a violation?
4. Is the system currently in violation of any SDWA or state regulatory requirements, including failure to pay fees, fines, or other administrative type requirements?
5. Does the utility prepare and distribute a Consumer Confidence Report (CCR)? Is it done every year? What type of response does the utility get to the CCR from customers?

<b>I. Emergency Planning</b>
------------------------------

1. Does the system have a written emergency plan to handle emergencies such as water outages, weather issues, loss of power, loss of major equipment, etc?
2. When was the last time the plan was updated?
3. Do all employees know where the plan is? Do they follow it?
4. Describe the last emergency the facility faced and how it was handled.

## Attachment A

### A. Technical Capacity Assessment Questions

1. Based on available information of water rights on record and water pumped has the system exceeded its water rights in the past year?      YES                       NO

In any of the past 5 years?      YES                       NO       How many times? \_\_\_\_\_

2. Does the system have the proper level of certified operator? *(Use questions a – c to answer.)*  
 YES                       NO

a. What is the Classification Level of the system by NMED? \_\_\_\_\_

b. Does the system have one or more certified operator(s)? [20 NMAC 7.4.20]

YES                       NO

c. If YES, provide the number of operators at each New Mexico Certification Level. [20 NMAC 7.4.12]

\_\_\_\_\_ NM Small System                      \_\_\_\_\_ Class 2

\_\_\_\_\_ NM Small System Advanced                      \_\_\_\_\_ Class 3

\_\_\_\_\_ Class 1                      \_\_\_\_\_ Class 4

3. Did the system correct any sanitary deficiency noted on the most recent sanitary survey within 6 months of receiving that information? [20 NMAC 7.20.504]

YES                       NO                       No Deficiencies

What was the type of deficiency? *(Check all that are applicable.)*

Source                       Storage

Treatment                       Distribution

Other \_\_\_\_\_

From the system’s perspective, were there any other deficiencies that were not noted on the sanitary survey?  
 Please describe.

4. Will the system’s current treatment process meet known future regulations?

Radionuclides                      YES                       NO                       Doesn’t Apply

Arsenic                      YES                       NO                       Doesn’t Apply

Stage 1 Disinfectants and Disinfection By-Product (DBP)

YES                       NO                       Doesn’t Apply

Surface Water Treatment Rule      YES                       NO                       Doesn’t Apply

5. Does the system have a current site plan/map? [20 NMAC 7.10.302 A.1.]

YES                       NO

6. Has the system had a water supply outage in the prior 24 months?

YES  NO

What were the causes of the outage(s)? (Include number of outages for each cause.)

Drought \_\_\_\_\_ Limited Supply \_\_\_\_\_

System Failure \_\_\_\_\_ Other \_\_\_\_\_

7. Has the system ever had a water audit or a leak evaluation?

YES  NO  Don't Know

If YES, please complete the following table.

Type of Investigation	Date Done	Water Loss (%)	What approach or technology was used to complete the investigation?	Was any follow-up done? If so, describe

8. Have all drinking water projects received NMED review and approval? [20 NMAC 7.10.201]

YES  NO

If NO, what types of projects have not received NMED review and approval.

Source  Storage

Treatment  Distribution

Other  \_\_\_\_\_

9. What are the typical customer complaints that the utility receives?

10. Approximately how many complaints are there per month? \_\_\_\_\_

11. How are customer complaints handled? Are they recorded?

12. What is the age and composition of the distribution system? *(Collect this information from the Sanitary Survey)*

Pipe Material	Approximate Age	Percentage of the system	Comments
			Sanitary Survey Distribution System Records Attached

13. Are there any dead end lines in the system?  
 YES  NO

14. Does the system have a flushing program?  
 YES  NO   
 If YES, please describe.

15. Are there any pressure problems within the system?  
 YES  NO   
 If YES, please describe.

16. Does the system disinfect the finished water?  
 YES  NO   
 If yes, which disinfectant product is used? \_\_\_\_\_

Interviewer Comments on Technical Capacity:
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**B. Managerial Capacity Assessment Questions**

17. Has the system completed a 5-year Infrastructure Capital Improvement Plan (ICIP) plan?  
 YES  NO

If YES, has the plan been submitted to Local Government Division?  
 YES  NO

18. Does the system have written operating procedures?  
 YES  NO

19. Does the system have written job descriptions for all staff?  
 YES  NO

20. Does the system have:
- A preventative maintenance plan?  
YES  NO
  - A source water protection plan?  
YES  NO  N/A
  - An emergency plan?  
YES  NO
  - A cross-connection control program?  
YES  NO
  - An emergency source?  
YES  NO
  - System security measures?  
YES  NO
21. Does the system report and maintain records in accordance with the drinking water regulations concerning:
- Water quality violations  
YES  NO
  - Public notification  
YES  NO
  - Sampling exemptions  
YES  NO
22. Please describe how the above records are maintained:
23. Describe the management structure for the water system, including board and operations staff. Please include examples of duties, if possible.
24. Please describe type and quantity of training or continuing education for staff identified above.
25. Describe last major project undertaken by the water system, including the following: project in detail, positive aspects, negative aspects, the way in which the project was funded, any necessary rate increases, the public response to the project, whether the project is complete or not, and any other pertinent information.

26. Does the system have any debt? YES  NO

If yes, is the system current with all debt payments?

YES  NO

If no, describe the applicable funding agency and the default.

27. Is the system currently contemplating or actively seeking funding for any project?

YES  NO

If yes, from which agency and how much?

Describe the project?

Is the system receiving assistance from any agency or organization in its efforts?

28. Will the system consider any type of regionalization with other PWS? (Check YES if the system has already regionalized.)

YES  NO

If YES, what type of regionalization has been implemented/considered/discussed? (Check all that apply.)

System interconnection

Sharing operator

Sharing bookkeeper

Purchasing water

Emergency water connection

Other: \_\_\_\_\_

29. Does the system have any of the following? (Check all that apply.)

Water Conservation Policy/Ordinance  Current Drought Plan

Water Use Restrictions  Water Supply Emergency Plan

Interviewer Comments on Managerial Capacity:

**C. Financial Capacity Assessment**

30. Does the system have a budget?  
 YES  NO   
 If YES, what type of budget?  
 Operating Budget   
 Capital Budget
31. Have the system revenues covered expenses and debt service for the past 5 years?  
 YES  NO   
 If NO, how many years has the system had a shortfall? \_\_\_\_\_
32. Does the system have a written/adopted rate structure?  
 YES  NO
33. What was the date of the last rate increase? \_\_\_\_\_
34. Are rates reviewed annually?  
 YES  NO   
 IF YES, what was the date of the last review? \_\_\_\_\_
35. Did the rate review show that the rates covered the following expenses? *(Check all that apply.)*
- |                                     |                          |
|-------------------------------------|--------------------------|
| Operation & Maintenance             | <input type="checkbox"/> |
| Infrastructure Repair & replacement | <input type="checkbox"/> |
| Staffing                            | <input type="checkbox"/> |
| Emergency/Reserve fund              | <input type="checkbox"/> |
| Debt payment                        | <input type="checkbox"/> |
36. Is the rate collection above 90% of the customers?  
 YES  NO
37. Is there a cut-off policy for customers who are in arrears with their bill or for illegal connections?  
 YES  NO   
 If yes, is this policy implemented?
38. What is the residential water rate for 6,000 gallons of usage in one month. \_\_\_\_\_
39. In the past 12 months, how many customers have had accounts frozen or dropped for non-payment? \_\_\_\_\_  
 [Convert to % of active connections  
 Less than 1%  1% - 3%  4% - 5%  6% - 10%   
 11% - 20%  21% - 50%  Greater than 50%  ]

40. The following questions refer to the process of obtaining needed equipment and supplies.

a. Can the water system operator buy or obtain supplies or equipment when they are needed?

YES  NO

b. Is the process simple or burdensome to the employees?

c. Can supplies or equipment be obtained quickly during an emergency?

YES  NO

d. Has the water system operator ever experienced a situation in which he/she couldn't purchase the needed supplies?

YES  NO

e. Does the system maintain some type of spare parts inventory?

YES  NO

If yes, please describe.

41. Has the system ever had a financial audit?

YES  NO

If YES, what is the date of the most recent audit? \_\_\_\_\_

42. Has the system ever had its electricity or phone turned off due to non-payment? Please describe.

Interviewer Comments on Financial Assessment:

43. What do you think the system capabilities are now and what are the issues you feel your system will be facing in the future? In addition, are there any specific needs, such as types of training that you would like to see addressed by NMED or its contractors?

## APPENDIX B COST BASIS

This section presents the basis for unit costs used to develop the conceptual cost estimates for the compliance alternatives. Cost estimates are conceptual in nature (+50%/-30%), and are intended to make comparisons between compliance options and to provide a preliminary indication of possible rate impacts. Consequently, these costs are pre-planning level and should not be viewed as final estimated costs for alternative implementation. Capital cost includes an allowance for engineering and construction management. It is assumed that adequate electrical power is available near the site. The cost estimates specifically do not include costs for the following:

- Obtaining land or easements.
- Surveying.
- Mobilization/demobilization for construction.
- Insurance and bonds

In general, unit costs are based on recent construction bids for similar work in the area; when possible, consultations with vendors or other suppliers; published construction and O&M cost data; and USEPA cost guidance. Unit costs used for the cost estimates are summarized in Table B.1.

Unit costs for pipeline components are based on 2008 RS Means Site Work & Landscape Cost Data. The number of borings and encasements and open cuts and encasements is estimated by counting the road, highway, railroad, stream, and river crossings for a conceptual routing of the pipeline. The number of air release valves is estimated by examining the land surface profile along the conceptual pipeline route. It is assumed that gate valves and flush valves would be installed, on average, every 5,000 feet along the pipeline. Pipeline cost estimates are based on the use of C-900 PVC pipe. Other pipe materials could be considered for more detailed development of attractive alternatives.

Pump station unit costs are based on experience with similar installations. The cost estimate for the pump stations include two pumps, station piping and valves, station electrical and instrumentation, minor site improvement, installation of a concrete pad, fence and building, and tools. The number of pump stations is based on calculations of pressure losses in the proposed pipeline for each alternative. Back-flow prevention is required in cases where pressure losses are negligible, and pump stations are not needed. Construction cost of a storage tank is based on consultations with vendors and 2008 RS Means Site Work & Landscape Cost Data.

Labor costs are estimated based on 2008 RS Means Site Work & Landscape Cost Data specific to the Lubbock County region.

1 Electrical power cost is estimated to be \$0.097 per kWh, as supplied by South Plains  
2 Electric. The annual cost for power to a pump station is calculated based on the pumping head  
3 and volume, and includes 11,800 kWh for pump building heating, cooling, and lighting, as  
4 recommended in USEPA publication, *Standardized Costs for Water Supply Distribution*  
5 *Systems* (1992).

6 In addition to the cost of electricity, pump stations have other maintenance costs. These  
7 costs cover: materials for minor repairs to keep the pumps operating; purchase of a  
8 maintenance vehicle, fuel costs, and vehicle maintenance costs; utilities; office supplies, small  
9 tools and equipment; and miscellaneous materials such as safety, clothing, chemicals, and  
10 paint. The non-power O&M costs are estimated based on the USEPA publication,  
11 *Standardized Costs for Water Supply Distribution Systems* (1992), which provides cost curves  
12 for O&M components. Costs from the 1992 report are adjusted to 2008 dollars based on the  
13 ENR construction cost index.

14 Pipeline maintenance costs include routine cleaning and flushing, as well as minor repairs  
15 to lines. The unit rate for pipeline maintenance is calculated based on the USEPA technical  
16 report, *Innovative and Alternate Technology Assessment Manual MCD 53* (1978). Costs from  
17 the 1978 report are adjusted to 2008 dollars based on the ENR construction cost index.

18 Storage tank maintenance costs include cleaning and renewal of interior lining and exterior  
19 coating. Unit costs for storage tank O&M are based on USEPA publication *Standardized Costs*  
20 *for Water Supply Distribution Systems* (1992). Costs from the 1992 report are adjusted to 2008  
21 dollars based on the ENR construction cost index.

22 The purchase price for point-of-use (POU) water treatment units is based on vendor price  
23 lists for treatment units, plus installation. O&M costs for POU treatment units are also based  
24 on vendor price lists. It is assumed that a yearly water sample would be analyzed for the  
25 contaminant of concern.

26 The purchase price for point-of-entry (POE) water treatment units is based on vendor price  
27 lists for treatment units, plus an allowance for installation, including a concrete pad and shed,  
28 piping modifications, and electrical connection. O&M costs for POE treatment units are also  
29 based on vendor price lists. It is assumed that a yearly water sample would be analyzed for the  
30 contaminant of concern.

31 Central treatment plant costs include pricing for buildings, utilities, and site work. Costs  
32 are based on pricing given in the various R.S. Means Construction Cost Data References, as  
33 well as prices obtained from similar work on other projects. Pricing for treatment equipment  
34 was obtained from vendors.

35 Well installation costs are based on 2008 RS Means Site Work & Landscape Cost Data.  
36 Well installation costs include drilling, a well pump, electrical and instrumentation installation,  
37 well finishing, piping, and water quality testing. O&M costs for water wells include power,  
38 materials, and labor. It is assumed that new wells located more than 1 mile from the intake  
39 point of an existing system would require a storage tank and pump station.

1 Purchase price for the treatment unit dispenser is based on vendor price lists, plus an  
2 allowance for installation at a centralized public location. The O&M costs are also based on  
3 vendor price lists. It is assumed that weekly water samples would be analyzed for the  
4 contaminant of concern.

5 Costs for bottled water delivery alternatives are based on consultation with vendors that  
6 deliver residential bottled water. The cost estimate includes an initial allowance for set-up of  
7 the program, and a yearly allowance for program administration.

8 The cost estimate for a public dispenser for trucked water includes the purchase price for a  
9 water truck and construction of a storage tank. Annual costs include labor for purchasing the  
10 water, picking up and delivering the water, truck maintenance, and water sampling and testing.  
11 It is assumed the water truck would be required to make one trip each week, and that chlorine  
12 residual would be determined for each truck load.

13

**Table B.1**  
**Summary of General Data**  
**Whorton Mobile Home Park**  
**1520149**  
**General PWS Information**

<b>Service Population</b> 60	<b>Number of Connections</b> 26
<b>Total PWS Daily Water Usage</b> 0.005 (mgd)	<b>Source</b> Site visit list

**Unit Cost Data**

General Items	Unit	Unit Cost	Central Treatment Unit Costs	Unit	Unit Cost
Treated water purchase cost	<i>See alternative</i>		<b>General</b>		
Water purchase cost (trucked)	\$/1,000 gals	\$ 2.61	Site preparation	acre	\$ 4,000
Contingency	20%	n/a	Slab	CY	\$ 1,000
Engineering & Constr. Management	25%	n/a	Building	SF	\$ 60
Procurement/admin (POU/POE)	20%	n/a	Building electrical	SF	\$ 8.00
			Building plumbing	SF	\$ 8.00
			Heating and ventilation	SF	\$ 7.00
			Fence	LF	\$ 15
			Paving	SF	\$ 2.00
<b>Pipeline Unit Costs</b>	<b>Unit</b>	<b>Unit Cost</b>	<b>General O&amp;M</b>		
PVC water line, Class 200, 04"	LF	\$ 12	Building power	kwh/yr	\$ 0.097
Bore and encasement, 10"	LF	\$ 240	Equipment power	kwh/yr	\$ 0.097
Open cut and encasement, 10"	LF	\$ 130	Labor, O&M	hr	\$ 40
Gate valve and box, 04"	EA	\$ 710	Analyses	test	\$ 200
Air valve	EA	\$ 2,050			
Flush valve	EA	\$ 1,025	<b>Reject Pond</b>		
Metal detectable tape	LF	\$ 2.00	Reject pond, excavation	CYD	\$ 3
			Reject pond, compacted fill	CYD	\$ 7
Bore and encasement, length	Feet	200	Reject pond, lining	SF	\$ 1.50
Open cut and encasement, length	Feet	50	Reject pond, vegetation	SY	\$ 1.50
			Reject pond, access road	LF	\$ 30
			Reject water haulage truck	EA	\$ 100,000
<b>Pump Station Unit Costs</b>	<b>Unit</b>	<b>Unit Cost</b>	<b>Reverse Osmosis</b>		
Pump	EA	\$ 8,000	Electrical	JOB	\$ 20,000
Pump Station Piping, 04"	EA	\$ 550	Piping	JOB	\$ 5,000
Gate valve, 04"	EA	\$ 710	RO package plant Wells 4, 7 and 8	UNIT	\$ 35,000
Check valve, 04"	EA	\$ 755	RO package plant Wells 2, 5 and 6	UNIT	\$ 35,000
Electrical/Instrumentation	EA	\$ 10,250	Transfer pumps (2 hp)	EA	\$ 2,000
Site work	EA	\$ 2,560	Permeate tank	gal	\$ 3
Building pad	EA	\$ 5,125	RO materials and chemicals	kgal	\$ 0.75
Pump Building	EA	\$ 10,250	RO chemicals	year	\$ 2,000
Fence	EA	\$ 6,150	Backwash disposal mileage cost	miles	\$ 1.50
Tools	EA	\$ 1,025	Backwash disposal fee	1,000 gal/yr	\$ 5.00
5,000 gal feed tank	EA	\$ 10,000			
Backflow preventer, 4"	EA	\$ 2,295	<b>EDR</b>		
Backflow Testing/Certification	EA	\$ 105	Electrical	JOB	\$ 25,000
			Piping	JOB	\$ 5,000
<b>Well Installation Unit Costs</b>	<b>Unit</b>	<b>Unit Cost</b>	Product storage tank	gal	\$ 3.00
Well installation	<i>See alternative</i>		EDR package plant - Well 1	UNIT	\$ 42,000
Water quality testing	EA	\$ 1,280	EDR package plant - Well 2	UNIT	\$ 42,000
5HP Well Pump	EA	\$ 2,750	EDR materials	kgal	\$ 0.48
Well electrical/instrumentation	EA	\$ 5,635	EDR chemicals	kgal	\$ 0.40
Well cover and base	EA	\$ 3,075	Backwash disposal mileage cost	miles	\$ 1.50
Piping	EA	\$ 3,075	Backwash disposal fee	1,000 gal/yr	\$ 5.00
5,000 gal ground storage tank	EA	\$ 10,000	Transfer pumps (2 hp)	EA	\$ 2,000
Electrical Power	\$/kWH	\$ 0.097			
Building Power	kWH	11,800			
Labor	\$/hr	\$ 60			
Materials	EA	\$ 1,540			
Transmission main O&M	\$/mile	\$ 275			
Tank O&M	EA	\$ 1,025			
<b>POU/POE Unit Costs</b>					
POU treatment unit purchase	EA	\$ 615			
POU treatment unit installation	EA	\$ 155			
POE treatment unit purchase	EA	\$ 5,125			
POE - pad and shed, per unit	EA	\$ 2,050			
POE - piping connection, per unit	EA	\$ 1,025			
POE - electrical hook-up, per unit	EA	\$ 1,025			
POU Treatment O&M, per unit	\$/year	\$ 230			
POE Treatment O&M, per unit	\$/year	\$ 1,540			
Treatment analysis	\$/year	\$ 205			
POU/POE labor support	\$/hr	\$ 40			
<b>Dispenser/Bottled Water Unit Costs</b>					
POE-Treatment unit purchase	EA	\$ 7,175			
POE-Treatment unit installation	EA	\$ 5,125			
Treatment unit O&M	EA	\$ 2,050			
Administrative labor	hr	\$ 45			
Bottled water cost (inc. delivery)	gallon	\$ 1.25			
Water use, per capita per day	gpcd	1.0			
Bottled water program materials	EA	\$ 5,125			
5,000 gal ground storage tank	EA	\$ 10,000			
Site improvements	EA	\$ 3,075			
Potable water truck	EA	\$ 75,000			
Water analysis, per sample	EA	\$ 205			
Potable water truck O&M costs	\$/mile	\$ 3.00			

1  
2

## **APPENDIX C COMPLIANCE ALTERNATIVE CONCEPTUAL COST ESTIMATES**

3        This appendix presents the conceptual cost estimates developed for the compliance  
4 alternatives. The conceptual cost estimates are given in Tables C.1 through C.12. The cost  
5 estimates are conceptual in nature (+50%/-30%), and are intended for making comparisons  
6 between compliance options and to provide a preliminary indication of possible water rate  
7 impacts. Consequently, these costs are pre-planning level and should not be viewed as final  
8 estimated costs for alternative implementation.

**Table C.1**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Purchase Water from Lubbock*  
**Alternative Number** *WT-1*

**Distance from Alternative to PWS (along pipe)** 0.5 miles  
**Total PWS annual water usage** 1.971 MG  
**Treated water purchase cost** \$ 0.83 per 1,000 gals  
**Pump Stations needed w/ 1 feed tank each** 0  
**On site storage tanks / pump sets needed** 2

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline Construction</i>				
Number of Crossings, bore	-	n/a	n/a	n/a
Number of Crossings, open cut	20	n/a	n/a	n/a
PVC water line, Class 200, 04"	2,510	LF	\$ 12	\$ 30,120
Bore and encasement, 10"	-	LF	\$ 240	\$ -
Open cut and encasement, 10"	1,000	LF	\$ 130	\$ 130,000
Gate valve and box, 04"	1	EA	\$ 710	\$ 356
Air valve	1	EA	\$ 2,050	\$ 2,050
Flush valve	1	EA	\$ 1,025	\$ 515
Metal detectable tape	2,510	LF	\$ 2	\$ 5,020
<b>Subtotal</b>				<b>\$ 168,061</b>

*Pump Station(s) Installation*

Pump	4	EA	\$ 8,000	\$ 32,000
Pump Station Piping, 04"	2	EA	\$ 550	\$ 1,100
Gate valve, 04"	8	EA	\$ 710	\$ 5,680
Check valve, 04"	4	EA	\$ 755	\$ 3,020
Electrical/Instrumentation	2	EA	\$ 10,250	\$ 20,500
Site work	2	EA	\$ 2,560	\$ 5,120
Building pad	2	EA	\$ 5,125	\$ 10,250
Pump Building	2	EA	\$ 10,250	\$ 20,500
Fence	2	EA	\$ 6,150	\$ 12,300
Tools	2	EA	\$ 1,025	\$ 2,050
5,000 gal feed tank	-	EA	\$ 10,000	\$ -
5,000 gal ground storage tank	2	EA	\$ 10,000	\$ 20,000
Backflow Preventor	1	EA	\$ 2,295	\$ 2,295
<b>Subtotal</b>				<b>\$ 134,815</b>

**Subtotal of Component Costs** \$ 302,876

Contingency 20% \$ 60,575  
 Design & Constr Management 25% \$ 75,719

**TOTAL CAPITAL COSTS** **\$ 439,170**

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline O&amp;M</i>				
Pipeline O&M	0.5	mile	\$ 275	\$ 131
<b>Subtotal</b>				<b>\$ 131</b>
<i>Water Purchase Cost</i>				
From PWS	1,971	1,000 gal	\$ 0.83	\$ 1,636
<b>Subtotal</b>				<b>\$ 1,636</b>

*Pump Station(s) O&M*

Building Power	23,600	kWH	\$ 0.097	\$ 2,289
Pump Power	296	kWH	\$ 0.097	\$ 29
Materials	2	EA	\$ 1,540	\$ 3,080
Labor	730	Hrs	\$ 60.00	\$ 43,800
Tank O&M	2	EA	\$ 1,025	\$ 2,050
Backflow Test/Cert	1	EA	\$ 105	\$ 105
<b>Subtotal</b>				<b>\$ 51,353</b>

*O&M Credit for Existing Well Closure*

Pump power	2,082	kWH	\$ 0.097	\$ (202)
Well O&M matl	2	EA	\$ 1,540	\$ (3,080)
Well O&M labor	360	Hrs	\$ 60	\$ (21,600)
<b>Subtotal</b>				<b>\$ (24,882)</b>

**TOTAL ANNUAL O&M COSTS** **\$ 28,238**

**Table C.2**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Purchase Water from CRMWA Lub - Tahoka*  
**Alternative Number** *WT-2*

**Distance from Alternative to PWS (along pipe)** 3.5 miles  
**Total PWS annual water usage** 1.971 MG  
**Treated water purchase cost** \$ 1.32 per 1,000 gals  
**Pump Stations needed w/ 1 feed tank each** 1  
**On site storage tanks / pump sets needed** 2

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline Construction</i>				
Number of Crossings, bore	-	n/a	n/a	n/a
Number of Crossings, open cut	8	n/a	n/a	n/a
PVC water line, Class 200, 04"	18,490	LF	\$ 12	\$ 221,880
Bore and encasement, 10"	-	LF	\$ 240	\$ -
Open cut and encasement, 10"	400	LF	\$ 130	\$ 52,000
Gate valve and box, 04"	4	EA	\$ 710	\$ 2,626
Air valve	6	EA	\$ 2,050	\$ 12,300
Flush valve	4	EA	\$ 1,025	\$ 3,790
Metal detectable tape	18,490	LF	\$ 2	\$ 36,980
<b>Subtotal</b>				<b>\$ 329,576</b>

*Pump Station(s) Installation*

Pump	6	EA	\$ 8,000	\$ 48,000
Pump Station Piping, 04"	3	EA	\$ 550	\$ 1,650
Gate valve, 04"	12	EA	\$ 710	\$ 8,520
Check valve, 04"	6	EA	\$ 755	\$ 4,530
Electrical/Instrumentation	3	EA	\$ 10,250	\$ 30,750
Site work	3	EA	\$ 2,560	\$ 7,680
Building pad	3	EA	\$ 5,125	\$ 15,375
Pump Building	3	EA	\$ 10,250	\$ 30,750
Fence	3	EA	\$ 6,150	\$ 18,450
Tools	3	EA	\$ 1,025	\$ 3,075
5,000 gal feed tank	1	EA	\$ 10,000	\$ 10,000
5,000 gal ground storage tank	2	EA	\$ 10,000	\$ 20,000
Backflow Preventor	-	EA	\$ 2,295	\$ -
<b>Subtotal</b>				<b>\$ 198,780</b>

**Subtotal of Component Costs** \$ 528,356

Contingency 20% \$ 105,671  
 Design & Constr Management 25% \$ 132,089

**TOTAL CAPITAL COSTS** **\$ 766,116**

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline O&amp;M</i>				
Pipeline O&M	3.5	mile	\$ 275	\$ 963
<b>Subtotal</b>				<b>\$ 963</b>
<i>Water Purchase Cost</i>				
From PWS	1,971	1,000 gal	\$ 1.32	\$ 2,602
<b>Subtotal</b>				<b>\$ 2,602</b>

*Pump Station(s) O&M*

Building Power	35,400	kWH	\$ 0.097	\$ 3,434
Pump Power	899	kWH	\$ 0.097	\$ 87
Materials	3	EA	\$ 1,540	\$ 4,620
Labor	1,095	Hrs	\$ 60.00	\$ 65,700
Tank O&M	2	EA	\$ 1,025	\$ 2,050
Backflow Test/Cert	0	EA	\$ 105	\$ -
<b>Subtotal</b>				<b>\$ 75,891</b>

*O&M Credit for Existing Well Closure*

Pump power	2,082	kWH	\$ 0.097	\$ (202)
Well O&M matl	2	EA	\$ 1,540	\$ (3,080)
Well O&M labor	360	Hrs	\$ 60	\$ (21,600)
<b>Subtotal</b>				<b>\$ (24,882)</b>

**TOTAL ANNUAL O&M COSTS** **\$ 54,574**

**Table C.3**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *New Well at 10 Miles*  
**Alternative Number** *WT-3*

**Distance from PWS to new well location** 10.0 miles  
**Estimated well depth** 300 feet  
**Number of wells required** 1  
**Well installation cost (location specific)** \$151 per foot  
**Pump Stations needed w/ 1 feed tank each** 2  
**On site storage tanks / pump sets needed** 2

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline Construction</i>				
Number of Crossings, bore	-	n/a	n/a	n/a
Number of Crossings, open cut	70	n/a	n/a	n/a
PVC water line, Class 200, 04"	52,800	LF	\$ 12	\$ 633,600
Bore and encasement, 10"	-	LF	\$ 240	\$ -
Open cut and encasement, 10"	3,500	LF	\$ 130	\$ 455,000
Gate valve and box, 04"	11	EA	\$ 710	\$ 7,498
Air valve	18	EA	\$ 2,050	\$ 36,900
Flush valve	11	EA	\$ 1,025	\$ 10,824
Metal detectable tape	52,800	LF	\$ 2	\$ 105,600
<b>Subtotal</b>				<b>\$ 1,249,422</b>

*Pump Station(s) Installation*

Pump	8	EA	\$ 8,000	\$ 64,000
Pump Station Piping, 04"	4	EA	\$ 550	\$ 2,200
Gate valve, 04"	16	EA	\$ 710	\$ 11,360
Check valve, 04"	8	EA	\$ 755	\$ 6,040
Electrical/Instrumentation	4	EA	\$ 10,250	\$ 41,000
Site work	4	EA	\$ 2,560	\$ 10,240
Building pad	4	EA	\$ 5,125	\$ 20,500
Pump Building	4	EA	\$ 10,250	\$ 41,000
Fence	4	EA	\$ 6,150	\$ 24,600
Tools	4	EA	\$ 1,025	\$ 4,100
5,000 gal feed tank	2	EA	\$ 10,000	\$ 20,000
5,000 gal ground storage tank	2	EA	\$ 10,000	\$ 20,000
<b>Subtotal</b>				<b>\$ 265,040</b>

*Well Installation*

Well installation	300	LF	\$ 151	\$ 45,150
Water quality testing	2	EA	\$ 1,280	\$ 2,560
Well pump	1	EA	\$ 2,750	\$ 2,750
Well electrical/instrumentation	1	EA	\$ 5,635	\$ 5,635
Well cover and base	1	EA	\$ 3,075	\$ 3,075
Piping	1	EA	\$ 3,075	\$ 3,075
<b>Subtotal</b>				<b>\$ 62,245</b>

**Subtotal of Component Costs** **\$ 1,576,707**

Contingency 20% \$ 315,341  
 Design & Constr Management 25% \$ 394,177

**TOTAL CAPITAL COSTS** **\$ 2,286,225**

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline O&amp;M</i>				
Pipeline O&M	10.0	mile	\$ 275	\$ 2,750
<b>Subtotal</b>				<b>\$ 2,750</b>

*Pump Station(s) O&M*

Building Power	47,200	kWH	\$ 0.097	\$ 4,578
Pump Power	3,003	kWH	\$ 0.097	\$ 291
Materials	4	EA	\$ 1,540	\$ 6,160
Labor	1,460	Hrs	\$ 60.00	\$ 87,600
Tank O&M	2	EA	\$ 1,025	\$ 2,050
<b>Subtotal</b>				<b>\$ 100,680</b>

*Well O&M*

Pump power	4,368	kWH	\$ 0.097	\$ 424
Well O&M matl	1	EA	\$ 1,540	\$ 1,540
Well O&M labor	180	Hrs	\$ 60	\$ 10,800
<b>Subtotal</b>				<b>\$ 12,764</b>

*O&M Credit for Existing Well Closure*

Pump power	2,082	kWH	\$ 0.097	\$ (202)
Well O&M matl	2	EA	\$ 1,540	\$ (3,080)
Well O&M labor	360	Hrs	\$ 60	\$ (21,600)
<b>Subtotal</b>				<b>\$ (24,882)</b>

**TOTAL ANNUAL O&M COSTS** **\$ 91,311**

**Table C.4**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *New Well at 5 Miles*  
**Alternative Number** *WT-4*

**Distance from PWS to new well location** 5.0 miles  
**Estimated well depth** 300 feet  
**Number of wells required** 1  
**Well installation cost (location specific)** \$151 per foot  
**Pump Stations needed w/ 1 feed tank each** 1  
**On site storage tanks / pump sets needed** 2

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline Construction</i>				
Number of Crossings, bore	-	n/a	n/a	n/a
Number of Crossings, open cut	35	n/a	n/a	n/a
PVC water line, Class 200, 04"	26,400	LF	\$ 12	\$ 316,800
Bore and encasement, 10"	-	LF	\$ 240	\$ -
Open cut and encasement, 10"	1,750	LF	\$ 130	\$ 227,500
Gate valve and box, 04"	5	EA	\$ 710	\$ 3,749
Air valve	9	EA	\$ 2,050	\$ 18,450
Flush valve	5	EA	\$ 1,025	\$ 5,412
Metal detectable tape	26,400	LF	\$ 2	\$ 52,800
<b>Subtotal</b>				<b>\$ 624,711</b>

*Pump Station(s) Installation*

Pump	6	EA	\$ 8,000	\$ 48,000
Pump Station Piping, 04"	3	EA	\$ 550	\$ 1,650
Gate valve, 04"	12	EA	\$ 710	\$ 8,520
Check valve, 04"	6	EA	\$ 755	\$ 4,530
Electrical/Instrumentation	3	EA	\$ 10,250	\$ 30,750
Site work	3	EA	\$ 2,560	\$ 7,680
Building pad	3	EA	\$ 5,125	\$ 15,375
Pump Building	3	EA	\$ 10,250	\$ 30,750
Fence	3	EA	\$ 6,150	\$ 18,450
Tools	3	EA	\$ 1,025	\$ 3,075
5,000 gal feed tank	1	EA	\$ 10,000	\$ 10,000
5,000 gal ground storage tank	2	EA	\$ 10,000	\$ 20,000
<b>Subtotal</b>				<b>\$ 198,780</b>

*Well Installation*

Well installation	300	LF	\$ 151	\$ 45,150
Water quality testing	2	EA	\$ 1,280	\$ 2,560
Well pump	1	EA	\$ 2,750	\$ 2,750
Well electrical/instrumentation	1	EA	\$ 5,635	\$ 5,635
Well cover and base	1	EA	\$ 3,075	\$ 3,075
Piping	1	EA	\$ 3,075	\$ 3,075
<b>Subtotal</b>				<b>\$ 62,245</b>

**Subtotal of Component Costs** **\$ 885,736**

Contingency 20% \$ 177,147  
 Design & Constr Management 25% \$ 221,434

**TOTAL CAPITAL COSTS** **\$ 1,284,317**

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline O&amp;M</i>				
Pipeline O&M	5.0	mile	\$ 275	\$ 1,375
<b>Subtotal</b>				<b>\$ 1,375</b>

*Pump Station(s) O&M*

Building Power	35,400	kWH	\$ 0.097	\$ 3,434
Pump Power	1,502	kWH	\$ 0.097	\$ 146
Materials	3	EA	\$ 1,540	\$ 4,620
Labor	1,095	Hrs	\$ 60.00	\$ 65,700
Tank O&M	2	EA	\$ 1,025	\$ 2,050
<b>Subtotal</b>				<b>\$ 75,949</b>

*Well O&M*

Pump power	4,368	kWH	\$ 0.097	\$ 424
Well O&M matl	1	EA	\$ 1,540	\$ 1,540
Well O&M labor	180	Hrs	\$ 60	\$ 10,800
<b>Subtotal</b>				<b>\$ 12,764</b>

*O&M Credit for Existing Well Closure*

Pump power	2,082	kWH	\$ 0.097	\$ (202)
Well O&M matl	2	EA	\$ 1,540	\$ (3,080)
Well O&M labor	360	Hrs	\$ 60	\$ (21,600)
<b>Subtotal</b>				<b>\$ (24,882)</b>

**TOTAL ANNUAL O&M COSTS** **\$ 65,206**

**Table C.5**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *New Well at 1 Mile*  
**Alternative Number** *WT-5*

**Distance from PWS to new well location** 1.0 miles  
**Estimated well depth** 300 feet  
**Number of wells required** 1  
**Well installation cost (location specific)** \$151 per foot  
**Pump Stations needed w/ 1 feed tank each** 0  
**On site storage tanks / pump sets needed** 2

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline Construction</i>				
Number of Crossings, bore	-	n/a	n/a	n/a
Number of Crossings, open cut	7	n/a	n/a	n/a
PVC water line, Class 200, 04"	5,280	LF	\$ 12	\$ 63,360
Bore and encasement, 10"	-	LF	\$ 240	\$ -
Open cut and encasement, 10"	350	LF	\$ 130	\$ 45,500
Gate valve and box, 04"	1	EA	\$ 710	\$ 750
Air valve	2	EA	\$ 2,050	\$ 4,100
Flush valve	1	EA	\$ 1,025	\$ 1,082
Metal detectable tape	5,280	LF	\$ 2	\$ 10,560
<b>Subtotal</b>				<b>\$ 125,352</b>

*Pump Station(s) Installation*

Pump	4	EA	\$ 8,000	\$ 32,000
Pump Station Piping, 04"	2	EA	\$ 550	\$ 1,100
Gate valve, 04"	8	EA	\$ 710	\$ 5,680
Check valve, 04"	4	EA	\$ 755	\$ 3,020
Electrical/Instrumentation	2	EA	\$ 10,250	\$ 20,500
Site work	2	EA	\$ 2,560	\$ 5,120
Building pad	2	EA	\$ 5,125	\$ 10,250
Pump Building	2	EA	\$ 10,250	\$ 20,500
Fence	2	EA	\$ 6,150	\$ 12,300
Tools	2	EA	\$ 1,025	\$ 2,050
5,000 gal feed tank	-	EA	\$ 10,000	\$ -
5,000 gal ground storage tank	2	EA	\$ 10,000	\$ 20,000
<b>Subtotal</b>				<b>\$ 132,520</b>

*Well Installation*

Well installation	300	LF	\$ 151	\$ 45,150
Water quality testing	2	EA	\$ 1,280	\$ 2,560
Well pump	1	EA	\$ 2,750	\$ 2,750
Well electrical/instrumentation	1	EA	\$ 5,635	\$ 5,635
Well cover and base	1	EA	\$ 3,075	\$ 3,075
Piping	1	EA	\$ 3,075	\$ 3,075
<b>Subtotal</b>				<b>\$ 62,245</b>

**Subtotal of Component Costs** **\$ 320,117**

Contingency 20% \$ 64,023  
 Design & Constr Management 25% \$ 80,029

**TOTAL CAPITAL COSTS** **\$ 464,170**

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Pipeline O&amp;M</i>				
Pipeline O&M	1.0	mile	\$ 275	\$ 275
<b>Subtotal</b>				<b>\$ 275</b>

*Pump Station(s) O&M*

Building Power	23,600	kWH	\$ 0.097	\$ 2,289
Pump Power	-	kWH	\$ 0.097	\$ -
Materials	2	EA	\$ 1,540	\$ 3,080
Labor	730	Hrs	\$ 60.00	\$ 43,800
Tank O&M	2	EA	\$ 1,025	\$ 2,050
<b>Subtotal</b>				<b>\$ 51,219</b>

*Well O&M*

Pump power	4,368	kWH	\$ 0.097	\$ 424
Well O&M matl	1	EA	\$ 1,540	\$ 1,540
Well O&M labor	180	Hrs	\$ 60	\$ 10,800
<b>Subtotal</b>				<b>\$ 12,764</b>

*O&M Credit for Existing Well Closure*

Pump power	2,082	kWH	\$ 0.097	\$ (202)
Well O&M matl	2	EA	\$ 1,540	\$ (3,080)
Well O&M labor	360	Hrs	\$ 60	\$ (21,600)
<b>Subtotal</b>				<b>\$ (24,882)</b>

**TOTAL ANNUAL O&M COSTS** **\$ 39,376**

**Table C.6**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Central Treatment - Reverse Osmosis*  
**Alternative Number** *WT-6*

**Capital Costs**

Cost Item	Well 1	Well 2	Total Cost
<i>Reverse Osmosis Unit Purchase/Installation</i>			
Site preparation	\$1,200	\$1,200	\$ 2,400
Slab	\$13,125	\$13,125	\$ 26,250
Building	\$21,000	\$21,000	\$ 42,000
Building electrical	\$2,800	\$2,800	\$ 5,600
Building plumbing	\$2,800	\$2,800	\$ 5,600
Heating and ventilation	\$2,450	\$2,450	\$ 4,900
Fence	\$6,000	\$6,000	\$ 12,000
Paving	\$3,000	\$3,000	\$ 6,000
Electrical	\$20,000	\$20,000	\$ 40,000
Piping	\$5,000	\$5,000	\$ 10,000
Reverse osmosis package including:			
High pressure pumps - 20 hp			
Cartridge filters and vessels			
RO membranes and vessels			
Control system			
Chemical feed systems			
Freight cost			
Vendor start-up services	\$35,000	\$35,000	\$ 70,000
Transfer pumps	\$8,000	\$8,000	\$ 16,000
Permeate tank	\$3,000	\$3,000	\$ 6,000
Feed Tank	\$21,000	\$21,000	
Reject pond:			
Excavation	\$900	\$900	\$ 1,800
Compacted fill	\$1,680	\$1,680	\$ 3,360
Lining	\$900	\$900	\$ 1,800
Vegetation	\$750	\$750	\$ 1,500
Access road	\$1,500	\$1,500	\$ 3,000
<b>Subtotal Design/Construction</b>	<b>\$150,105</b>	<b>\$150,105</b>	<b>\$ 258,210</b>
Contingency	\$30,021	\$30,021	\$ 60,042
Design & Constr Management	\$37,526	\$37,526	\$ 75,053
Reject water haulage truck	\$100,000	\$0	\$ 100,000

<b>\$ 317,652</b>	<b>\$ 217,652</b>	<b>\$ 493,305</b>
<b>Well 1 RO</b>	<b>Well 2 RO</b>	<b>Total Cost</b>

**Annual Operations and Maintenance Costs**

Cost Item	Well 1 RO	Well 2 RO	Total Cost
<i>Reverse Osmosis Unit O&amp;M</i>			
Building Power	\$291	\$291	\$ 582
Equipment power	\$679	\$679	\$ 1,358
Labor	\$24,000	\$16,000	\$ 40,000
RO materials and Chemicals	\$825	\$825	\$ 1,650
Analyses	\$2,400	\$2,400	\$ 4,800
<b>Subtotal</b>	<b>\$ 28,195</b>	<b>\$ 20,195</b>	<b>\$ 48,390</b>
<i>Backwash Disposal</i>			
Disposal truck mileage	\$1,650	\$1,650	\$ 3,300
Backwash disposal fee	\$2,253	\$2,253	\$ 4,505
<b>Subtotal</b>	<b>\$ 3,903</b>	<b>\$ 3,903</b>	<b>\$ 7,805</b>

O&M costs are based on total water production, independent of plant location.

<b>\$ 32,098</b>	<b>\$ 24,098</b>	<b>\$ 56,195</b>
<b>Well 1 RO</b>	<b>Well 2 RO</b>	<b>Total Cost</b>

**Table C.6.1**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *RO - Well 1*  
**Alternative Number** *WT-6*

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Reverse Osmosis Unit Purchase/Installation</i>				
Site preparation	0.30	acre	\$ 4,000	\$ 1,200
Slab	13	CY	\$ 1,000	\$ 13,125
Building	350	SF	\$ 60	\$ 21,000
Building electrical	350	SF	\$ 8	\$ 2,800
Building plumbing	350	SF	\$ 8	\$ 2,800
Heating and ventilation	350	SF	\$ 7	\$ 2,450
Fence	400	LF	\$ 15	\$ 6,000
Paving	1,500	SF	\$ 2	\$ 3,000
Electrical	1	JOB	\$ 20,000	\$ 20,000
Piping	1	JOB	\$ 5,000	\$ 5,000
Reverse osmosis package including:				
High pressure pumps - 20 hp				
Cartridge filters and vessels				
RO membranes and vessels				
Control system				
Chemical feed systems				
Freight cost				
Vendor start-up services	1	UNIT	\$ 35,000	\$ 35,000
Transfer pumps	4	EA	\$ 2,000	\$ 8,000
Permeate tank	1,000	gal	\$ 3	\$ 3,000
Feed Tank	7,000	gal	\$ 3	\$ 21,000
Reject pond:				
Excavation	300	CYD	\$ 3.00	\$ 900
Compacted fill	240	CYD	\$ 7.00	\$ 1,680
Lining	600	SF	\$ 1.50	\$ 900
Vegetation	500	SY	\$ 1.50	\$ 750
Access road	50	LF	\$ 30.00	\$ 1,500
<b>Subtotal of Design/Construction Costs</b>				<b>\$ 150,105</b>
Contingency	20%		\$	30,021
Design & Constr Management	25%		\$	37,526
Reject water haulage truck	1	EA	\$ 100,000	\$ 100,000

**TOTAL CAPITAL COSTS** **\$ 317,652**

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Reverse Osmosis Unit O&amp;M</i>				
Building Power	3,000	kwh/yr	\$ 0.097	\$ 291
Equipment power	7,000	kwh/yr	\$ 0.097	\$ 679
Labor	600	hrs/yr	\$ 40.00	\$ 24,000
RO materials and Chemicals	1,100	kgal	\$ 0.75	\$ 825
Analyses	12	test	\$ 200	\$ 2,400
<b>Subtotal</b>				<b>\$ 28,195</b>
<i>Backwash Disposal</i>				
Disposal truck mileage	1,100	miles	\$ 1.50	\$ 1,650
Backwash disposal fee	451	kgal/yr	\$ 5.00	\$ 2,253
<b>Subtotal</b>				<b>\$ 3,903</b>

**TOTAL ANNUAL O&M COSTS** **\$ 32,098**

**Table C.6.2**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *RO - Well 2*  
**Alternative Number** *WT-6*

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Reverse Osmosis Unit Purchase/Installation</i>				
Site preparation	0.30	acre	\$ 4,000	\$ 1,200
Slab	13	CY	\$ 1,000	\$ 13,125
Building	350	SF	\$ 60	\$ 21,000
Building electrical	350	SF	\$ 8	\$ 2,800
Building plumbing	350	SF	\$ 8	\$ 2,800
Heating and ventilation	350	SF	\$ 7	\$ 2,450
Fence	400	LF	\$ 15	\$ 6,000
Paving	1,500	SF	\$ 2	\$ 3,000
Electrical	1	JOB	\$ 20,000	\$ 20,000
Piping	1	JOB	\$ 5,000	\$ 5,000
Reverse osmosis package including:				
High pressure pumps - 20 hp				
Cartridge filters and vessels				
RO membranes and vessels				
Control system				
Chemical feed systems				
Freight cost				
Vendor start-up services	1	UNIT	\$ 35,000	\$ 35,000
Transfer pumps	4	EA	\$ 2,000	\$ 8,000
Permeate tank	1,000	gal	\$ 3	\$ 3,000
Feed Tank	7,000	gal	\$ 3	\$ 21,000
Reject pond:				
Excavation	300	CYD	\$ 3.00	\$ 900
Compacted fill	240	CYD	\$ 7.00	\$ 1,680
Lining	600	SF	\$ 1.50	\$ 900
Vegetation	500	SY	\$ 1.50	\$ 750
Access road	50	LF	\$ 30.00	\$ 1,500
<b>Subtotal of Design/Construction Costs</b>				<b>\$ 150,105</b>
Contingency	20%		\$	30,021
Design & Constr Management	25%		\$	37,526
Reject water haulage truck	-	EA	\$ 100,000	\$ -
<b>TOTAL CAPITAL COSTS</b>				<b>\$ 217,652</b>

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Reverse Osmosis Unit O&amp;M</i>				
Building Power	3,000	kwh/yr	\$ 0.097	\$ 291
Equipment power	7,000	kwh/yr	\$ 0.097	\$ 679
Labor	400	hrs/yr	\$ 40.00	\$ 16,000
RO materials and Chemicals	1,100	kgal	\$ 0.75	\$ 825
Analyses	12	test	\$ 200	\$ 2,400
<b>Subtotal</b>				<b>\$ 20,195</b>
<i>Backwash Disposal</i>				
Disposal truck mileage	1,100	miles	\$ 1.50	\$ 1,650
Backwash disposal fee	451	kgal/yr	\$ 5.00	\$ 2,253
<b>Subtotal</b>				<b>\$ 3,903</b>
<b>TOTAL ANNUAL O&amp;M COSTS</b>				<b>\$ 24,098</b>

**Table C.7**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Central Treatment - Electro-dialysis Reversal*  
**Alternative Number** *WT-7*

**Capital Costs**

Cost Item	Well 1	Well 2	Total Cost
<i>Electrodialysis Reversal System Purchase/Installation</i>			
Site preparation	\$800	\$800	\$ 1,600
Slab	\$11,250	\$11,250	\$ 22,500
Building	\$18,000	\$18,000	\$ 36,000
Building electrical	\$2,400	\$2,400	\$ 4,800
Building plumbing	\$2,400	\$2,400	\$ 4,800
Heating and ventilation	\$2,100	\$2,100	\$ 4,200
Fence	\$4,500	\$4,500	\$ 9,000
Paving	\$2,000	\$2,000	\$ 4,000
Electrical	\$25,000	\$25,000	\$ 50,000
Piping	\$5,000	\$5,000	\$ 10,000
EDR package including:			
Feed and concentrate pumps			
Cartridge filters and vessels			
EDR membrane stacks			
Electrical module			
Chemical feed systems			
Freight cost			
Vendor start-up services	\$42,000	\$42,000	\$ 84,000
Transfer pumps	\$8,000	\$8,000	\$ 16,000
Permeate tank	\$3,000	\$3,000	\$ 6,000
Feed Tank	\$21,000	\$21,000	\$ 42,000
Reject pond:			
Excavation	\$600	\$600	\$ 1,200
Compacted fill	\$1,120	\$1,120	\$ 2,240
Lining	\$600	\$600	\$ 1,200
Vegetation	\$600	\$600	\$ 1,200
Access road	\$1,500	\$1,500	\$ 3,000
<b>Subtotal Design/Construction</b>	<b>\$151,870</b>	<b>\$151,870</b>	<b>\$ 303,740</b>
Contingency	\$30,374	\$30,021	\$ 60,395
Design & Constr Management	\$37,968	\$37,526	\$ 75,494
Reject water haulage truck	\$100,000	\$0	\$ 100,000

<b>\$ 320,212</b>	<b>\$ 219,417</b>	<b>\$ 539,629</b>
<b>Well 1 EDR</b>	<b>Well 2 EDR</b>	<b>Total Cost</b>

**Annual Operations and Maintenance Costs**

Cost Item	Well 1 EDR	Well 2 EDR	Total Cost
<i>EDR Unit O&amp;M</i>			
Building Power	\$243	\$243	\$ 485
Equipment power	\$873	\$873	\$ 1,746
Labor	\$20,000	\$20,000	\$ 40,000
Materials	\$528	\$528	\$ 1,056
Chemicals	\$440	\$440	\$ 880
Analyses	\$2,400	\$2,400	\$ 4,800
<b>Subtotal</b>	<b>\$ 24,484</b>	<b>\$ 24,484</b>	<b>\$ 48,967</b>
<i>Backwash Disposal</i>			
Disposal truck mileage	\$1,050	\$1,050	\$ 2,100
Backwash disposal fee	\$1,483	\$1,483	\$ 2,965
<b>Subtotal</b>	<b>\$ 2,533</b>	<b>\$ 2,533</b>	<b>\$ 5,065</b>

O&M costs are based on total water production, independent of plant location.

<b>\$ 27,016</b>	<b>\$ 27,016</b>	<b>\$ 54,032</b>
<b>Well 1 EDR</b>	<b>Well 2 EDR</b>	<b>Total Cost</b>

**Table C.7.1**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *EDR - Well 1*  
**Alternative Number** *WT-7*

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Electrodialysis Reversal System Purchase/Installation</i>				
Site preparation	0.20	acre	\$ 4,000	\$ 800
Slab	11	CY	\$ 1,000	\$ 11,250
Building	300	SF	\$ 60	\$ 18,000
Building electrical	300	SF	\$ 8	\$ 2,400
Building plumbing	300	SF	\$ 8	\$ 2,400
Heating and ventilation	300	SF	\$ 7	\$ 2,100
Fence	300	LF	\$ 15	\$ 4,500
Paving	1,000	SF	\$ 2	\$ 2,000
Electrical	1	JOB	\$ 25,000	\$ 25,000
Piping	1	JOB	\$ 5,000	\$ 5,000
EDR package including:				
Feed and concentrate pumps				
Cartridge filters and vessels				
EDR membrane stacks				
Electrical module				
Chemical feed systems				
Freight cost				
Vendor start-up services	1	UNIT	\$ 42,000	\$ 42,000
Transfer pumps	4	EA	\$ 2,000	\$ 8,000
Product Water Tank	1,000	gal	\$ 3.00	\$ 3,000
Feed Tank	7,000	gal	\$ 3.00	\$ 21,000
Reject pond:				
Excavation	200	CYD	\$ 3.00	\$ 600
Compacted fill	160	CYD	\$ 7.00	\$ 1,120
Lining	400	SF	\$ 1.50	\$ 600
Vegetation	400	SY	\$ 1.50	\$ 600
Access road	50	LF	\$ 30.00	\$ 1,500
<b>Subtotal of Design/Construction Costs</b>				<b>\$ 151,870</b>
Contingency	20%		\$	30,374
Design & Constr Management	25%		\$	37,968
Reject water haulage truck	1	EA	\$ 100,000	\$ 100,000
<b>TOTAL CAPITAL COSTS</b>				<b>\$ 320,212</b>

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>EDR Unit O&amp;M</i>				
Building Power	2,500	kwh/yr	\$ 0.097	\$ 243
Equipment power	9,000	kwh/yr	\$ 0.097	\$ 873
Labor	500	hrs/yr	\$ 40.00	\$ 20,000
Materials	1,100	kgal	\$ 0.48	\$ 528
Chemicals	1,100	kgal	\$ 0.40	\$ 440
Analyses	12	test	\$ 200	\$ 2,400
<b>Subtotal</b>				<b>\$ 24,484</b>
<i>Backwash Disposal</i>				
Disposal truck mileage	700	miles	\$ 1.50	\$ 1,050
Backwash disposal fee	297	kgal/yr	\$ 5.00	\$ 1,483
<b>Subtotal</b>				<b>\$ 2,533</b>

**TOTAL ANNUAL O&M COSTS** **\$ 27,016**

**Table C.7.2**

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *EDR - Well 2*  
**Alternative Number** *WT-7*

**Capital Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Re Electrolysis Reversal System Purchase/Installation</i>				
Site preparation	0.20	acre	\$ 4,000	\$ 800
Slab	11	CY	\$ 1,000	\$ 11,250
Building	300	SF	\$ 60	\$ 18,000
Building electrical	300	SF	\$ 8	\$ 2,400
Building plumbing	300	SF	\$ 8	\$ 2,400
Heating and ventilation	300	SF	\$ 7	\$ 2,100
Fence	300	LF	\$ 15	\$ 4,500
Paving	1,000	SF	\$ 2	\$ 2,000
Electrical	1	JOB	\$ 25,000	\$ 25,000
Piping	1	JOB	\$ 5,000	\$ 5,000
EDR package including:				
Feed and concentrate pumps				
Cartridge filters and vessels				
EDR membrane stacks				
Electrical module				
Chemical feed systems				
Freight cost				
Vendor start-up services	1	UNIT	\$ 42,000	\$ 42,000
Transfer pumps	4	EA	\$ 2,000	\$ 8,000
Product Water Tank	1,000	gal	\$ 3.00	\$ 3,000
Feed Tank	7,000	gal	\$ 3.00	\$ 21,000
Reject pond:				
Excavation	200	CYD	\$ 3.00	\$ 600
Compacted fill	160	CYD	\$ 7.00	\$ 1,120
Lining	400	SF	\$ 1.50	\$ 600
Vegetation	400	SY	\$ 1.50	\$ 600
Access road	50	LF	\$ 30.00	\$ 1,500
<b>Subtotal of Design/Construction Costs</b>				<b>\$ 151,870</b>
Contingency	20%		\$	30,374
Design & Constr Management	25%		\$	37,968
Reject water haulage truck	-	EA	\$ 100,000	\$ -
<b>TOTAL CAPITAL COSTS</b>				<b>\$ 220,212</b>

**Annual Operations and Maintenance Costs**

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>EDR Unit O&amp;M</i>				
Building Power	2,500	kwh/yr	\$ 0.097	\$ 243
Equipment power	9,000	kwh/yr	\$ 0.097	\$ 873
Labor	500	hrs/yr	\$ 40.00	\$ 20,000
Materials	1,100	kgal	\$ 0.48	\$ 528
Chemicals	1,100	kgal	\$ 0.40	\$ 440
Analyses	12	test	\$ 200	\$ 2,400
<b>Subtotal</b>				<b>\$ 24,484</b>
<i>Backwash Disposal</i>				
Disposal truck mileage	700	miles	\$ 1.50	\$ 1,050
Backwash disposal fee	297	kgal/yr	\$ 5.00	\$ 1,483
<b>Subtotal</b>				<b>\$ 2,533</b>

**TOTAL ANNUAL O&M COSTS** **\$ 27,016**

## Table C.8

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Point-of-Use Treatment*  
**Alternative Number** *WT-8*

**Number of Connections for POU Unit Installation** 26 connections

### Capital Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>POU-Treatment - Purchase/Installation</i>				
POU treatment unit purchase	26	EA	\$ 615	\$ 15,990
POU treatment unit installation	26	EA	\$ 155	\$ 4,030
<b>Subtotal</b>				<b>\$ 20,020</b>
<b>Subtotal of Component Costs</b>				<b>\$ 20,020</b>
Contingency	20%		\$	4,004
Design & Constr Management	25%		\$	5,005
Procurement & Administration	20%		\$	4,004
<b>TOTAL CAPITAL COSTS</b>				<b>\$ 33,033</b>

### Annual Operations and Maintenance Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>O&amp;M</i>				
POU materials, per unit	26	EA	\$ 230	\$ 5,980
Contaminant analysis, 1/yr per unit	26	EA	\$ 205	\$ 5,330
Program labor, 10 hrs/unit	260	hrs	\$ 40	\$ 10,400
<b>Subtotal</b>				<b>\$ 21,710</b>
<b>TOTAL ANNUAL O&amp;M COSTS</b>				<b>\$ 21,710</b>

## Table C.9

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Point-of-Entry Treatment*  
**Alternative Number** *WT-9*

Number of Connections for POE Unit Installation 26 connections

### Capital Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>POE-Treatment - Purchase/Installat</i>				
POE treatment unit purchase	26	EA	\$ 5,125	\$ 133,250
Pad and shed, per unit	26	EA	\$ 2,050	\$ 53,300
Piping connection, per unit	26	EA	\$ 1,025	\$ 26,650
Electrical hook-up, per unit	26	EA	\$ 1,025	\$ 26,650
<b>Subtotal</b>				<b>\$ 239,850</b>

**Subtotal of Component Costs \$ 239,850**

Contingency	20%	\$ 47,970
Design & Constr Management	25%	\$ 59,963
Procurement & Administration	20%	\$ 47,970

**TOTAL CAPITAL COSTS \$ 395,753**

### Annual Operations and Maintenance Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>O&amp;M</i>				
POE materials, per unit	26	EA	\$ 1,540	\$ 40,040
Contaminant analysis, 1/yr per unit	26	EA	\$ 205	\$ 5,330
Program labor, 10 hrs/unit	260	hrs	\$ 40	\$ 10,400
<b>Subtotal</b>				<b>\$ 55,770</b>

**TOTAL ANNUAL O&M COSTS \$ 55,770**

## Table C.10

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Public Dispenser for Treated Drinking Water*  
**Alternative Number** *WT-10*

Number of Treatment Units Recommended 1

### Capital Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Public Dispenser Unit Installation</i>				
POE-Treatment unit(s)	1	EA	\$ 7,175	\$ 7,175
Unit installation costs	1	EA	\$ 5,125	\$ 5,125
<b>Subtotal</b>				<b>\$ 12,300</b>
<b>Subtotal of Component Costs</b>				<b>\$ 12,300</b>
Contingency	20%			\$ 2,460
Design & Constr Management	25%			\$ 3,075
<b>TOTAL CAPITAL COSTS</b>				<b>17,835</b>

### Annual Operations and Maintenance Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Program Operation</i>				
Treatment unit O&M, 1 per unit	1	EA	\$ 2,050	\$ 2,050
Contaminant analysis, 1/wk per u	52	EA	\$ 205	\$ 10,660
Sampling/reporting, 1 hr/day	365	HRS	\$ 60	\$ 21,900
<b>Subtotal</b>				<b>\$ 34,610</b>
<b>TOTAL ANNUAL O&amp;M COSTS</b>				<b>\$ 34,610</b>

## Table C.11

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Supply Bottled Water to 100% of Population*  
**Alternative Number** *WT-11*

**Service Population** 60  
**Percentage of population requiring supply** 100%  
**Water consumption per person** 1.00 gpcd  
**Calculated annual potable water needs** 21,900 gallons

### Capital Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Program Implementation</i>				
Initial program set-up	500	hours	\$ 45	\$ 22,500
<b>Subtotal</b>				<b>\$ 22,500</b>
<b>Subtotal of Component Costs</b>				<b>\$ 22,500</b>
Contingency	20%			\$ 4,500
<b>TOTAL CAPITAL COSTS</b>				<b>\$ 27,000</b>

### Annual Operations and Maintenance Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Program Operation</i>				
Water purchase costs	21,900	gals	\$ 1.25	\$ 27,375
Program admin, 9 hrs/wk	468	hours	\$ 45	\$ 21,060
Program materials	1	EA	\$ 5,125	\$ 5,125
<b>Subtotal</b>				<b>\$ 53,560</b>
<b>TOTAL ANNUAL O&amp;M COSTS</b>				<b>\$ 53,560</b>

## Table C.12

**PWS Name** *Whorton Mobile Home Park*  
**Alternative Name** *Central Trucked Drinking Water*  
**Alternative Number** *WT-12*

**Service Population** 60  
**Percentage of population requiring supply** 100%  
**Water consumption per person** 1.00 gpcd  
**Calculated annual potable water needs** 21,900 gallons  
**Travel distance to compliant water source** 1 miles

### Capital Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Storage Tank Installation</i>				
5,000 gal ground storage tank	1	EA	\$ 10,000	\$ 10,000
Site improvements	1	EA	\$ 3,075	\$ 3,075
Potable water truck	1	EA	\$ 75,000	\$ 75,000
<b>Subtotal</b>				<b>\$ 88,075</b>
<b>Subtotal of Component Costs</b>				<b>\$ 88,075</b>
Contingency	20%		\$	17,615
Design & Constr Management	25%		\$	22,019
<b>TOTAL CAPITAL COSTS</b>			<b>\$</b>	<b>127,709</b>

### Annual Operations and Maintenance Costs

Cost Item	Quantity	Unit	Unit Cost	Total Cost
<i>Program Operation</i>				
Water delivery labor, 4 hrs/wk	208	hrs	\$ 60	\$ 12,480
Truck operation, 1 round trip/wk	52	miles	\$ 3.00	\$ 156
Water purchase	22	1,000 gals	\$ 2.61	\$ 57
Water testing, 1 test/wk	52	EA	\$ 205	\$ 10,660
Sampling/reporting, 2 hrs/wk	104	hrs	\$ 60	\$ 6,240
<b>Subtotal</b>				<b>\$ 29,593</b>
<b>TOTAL ANNUAL O&amp;M COSTS</b>				<b>\$ 29,593</b>

1  
2  
3

**APPENDIX D  
EXAMPLE FINANCIAL MODEL**

Appendix D  
General Inputs

**Whorton MHP**

Number of Alternatives 12 Selected from Results Sheet

*Input Fields are Indicated by:* [Red Box]

<b>General Inputs</b>		
Implementation Year	2009	
Months of Working Capital	0	
Depreciation	\$ -	
Percent of Depreciation for Replacement Fund	0%	
Allow Negative Cash Balance (yes or no)	No	
Median Household Income	\$ 30,524	Whorton MHP
Median HH Income -- Texas	\$ 39,927	
Grant Funded Percentage	0%	Selected from Results
Capital Funded from Revenues	\$ -	
<b>Base Year</b>		
	Growth/Escalation	2007
<b>Accounts &amp; Consumption</b>		
<b>Metered Residential Accounts</b>		
Number of Accounts	0.0%	26
Number of Bills Per Year		12
Annual Billed Consumption		1,971,000
Consumption per Account Per Pay Period	0.0%	6,317
Consumption Allowance in Rates		100,000
Total Allowance		31,200,000
Net Consumption Billed		(29,229,000)
Percentage Collected		100.0%
<b>Unmetered Residential Accounts</b>		
Number of Accounts	0.0%	0
Number of Bills Per Year		12
Percentage Collected		100.0%
<b>Metered Non-Residential Accounts</b>		
Number of Accounts	0.0%	0
Number of Bills Per Year		12
Non-Residential Consumption		-
Consumption per Account	0.0%	-
Consumption Allowance in Rates		-
Total Allowance		-
Net Consumption Billed		-
Percentage Collected		0.0%
<b>Unmetered Non-Residential Accounts</b>		
Number of Accounts	0.0%	0
Number of Bills Per Year		12
Percentage Collected		100.0%
<b>Water Purchase &amp; Production</b>		
Water Purchased (gallons)	0.0%	-
Average Cost Per Unit Purchased	0.0%	\$ -
Bulk Water Purchases	0.0%	\$ -
Water Production	0.0%	1,971,000
Unaccounted for Water		-
Percentage Unaccounted for Water		0.0%

Appendix D  
General Inputs

**Whorton MHP**

Number of Alternatives

12

Selected from Results Sheet

*Input Fields are Indicated by:*

<b>Residential Rate Structure</b>	Allowance within Tier	
Base Monthly Payment	-	\$ 15.00
		\$ -
<b>Non-Residential Rate Structure</b>		
Estimated Average Water Rate (\$/1000gallons)	-	\$ -
<b>INITIAL YEAR EXPENDITURES</b>	Inflation	Initial Year
<b>Operating Expenditures:</b>		
Salaries & Benefits	0.0%	-
Contract Labor	0.0%	-
Water Purchases	0.0%	-
Chemicals, Treatment	0.0%	-
Utilities	0.0%	-
Repairs, Maintenance, Supplies	0.0%	-
Repairs	0.0%	-
Maintenance	0.0%	-
Supplies	0.0%	-
Administrative Expenses	0.0%	-
Accounting and Legal Fees	0.0%	-
Insurance	0.0%	-
Automotive and Travel	0.0%	-
Professional and Directors Fees	0.0%	-
Bad Debts	0.0%	-
Garbage Pick-up	0.0%	-
Miscellaneous	0.0%	-
Other 3	0.0%	7,799
Other 4	0.0%	-
Incremental O&M for Alternative	0.0%	-
<b>Total Operating Expenses</b>		<b>7,799</b>
<b>Non-Operating Income/Expenditures</b>		
Interest Income	0.0%	-
Other Income	0.0%	-
Other Expense	0.0%	-
Transfers In (Out)	0.0%	-
<b>Net Non-Operating</b>		<b>-</b>
<b>Esisting Debt Service</b>		
Bonds Payable, Less Current Maturities		\$ -
Bonds Payable, Current		\$ -
Interest Expense		\$ -







1       Once the active residential PWSs were identified, they were screened for the common  
2 contaminants in the area: arsenic, selenium, fluoride, nitrate, and uranium. Systems with  
3 concentrations of the identified contaminants greater than MCLs were deemed to have  
4 noncompliant water. It is important to note that this screening was not an official compliance  
5 determination, and a system’s compliance status determined from the screening may not  
6 coincide with a system’s actual compliance status. Discrepancies may result from the data  
7 available not being current, the use of simplified algorithms to give an indication of  
8 compliance, *etc.*

9       The PWSs identified with potential water quality compliance issues are shown in  
10 Table E.1, along with numbers of connections, the population served, and average daily  
11 consumption. For the LARS, the area has been divided into three separate subareas named  
12 LARS–Lubbock, LARS-Lamesa, and LARS-Brownfield. The PWSs, population, connections,  
13 and average daily consumptions for these subareas are shown in Tables E.2, E.3, and E.4.  
14 These systems are also shown in Figure E.1. As can be seen on the figure, these systems are  
15 generally located near Lubbock and south of Lubbock.

### 16 **E.1.3 Existing Drinking Water Supplies and Infrastructure**

17       PWSs in the area typically obtain drinking water from wells, purchase water from the City  
18 of Lubbock, or obtain water from the Canadian River Municipal Water Authority (CRMWA),  
19 either as one of the 11 member cities or as customers of a member city. The City of Lubbock is  
20 a member city of the CRMWA and has the largest water system in the area. As well as getting  
21 water from the CRMWA, Lubbock obtains water from its own well field in Bailey County.  
22 The CRMWA provides surface water and groundwater via a pipeline from the north to a water  
23 treatment plant located at and operated by Lubbock, from which point the treated water is  
24 distributed via transmission mains to the seven member cities west and south of Lubbock.  
25 There are existing CRMWA pipelines that extend to the southeast and west and southwest from  
26 Lubbock. The approximate location and extent of these lines are shown in Figure E.1.

27       The CRMWA production is fully committed to the 11 member cities. In addition, the  
28 transmission mains from Lubbock to the other seven member cities are at capacity during the  
29 summer months. Therefore, the LARS scenario proposed here uses new wells for the water  
30 source and if existing pipeline infrastructure is used for water transmission, allowances are  
31 made to account for any pipeline capacity used.

### 32 **E.2 Description of the LARS**

33       Since existing water supplies and infrastructure do not have sufficient capacity available,  
34 and the existing infrastructure does not cover the entire area projected to be served by the  
35 LARS, the LARS needs to provide both a water source and a means of conveyance. To  
36 accomplish this, the LARS includes several groundwater treatment plants located near clusters  
37 of PWSs with water quality problems. The locations of these treatment plants include one near  
38 the existing water treatment plant in Lubbock, one at Lamesa, and one at Brownfield  
39 (Figure E.2).

40       In addition to the groundwater treatment plants, new well fields would also be required to  
41 feed the groundwater treatment plants. The assumed water quality used to design each

1 groundwater treatment plant is based on water quality data for PWSs near the proposed plant  
2 location. Groundwater treatment will be achieved using RO technology because, of the two  
3 technologies best suited for treating contaminants generally found in the water of the Ogallala-  
4 South aquifer (RO and EDR), RO is typically the most economical option.

5 The plant at Lubbock would tie into the Lubbock distribution system. The water would be  
6 passed through the Lubbock distribution system, and pipelines would be run from the Lubbock  
7 distribution system to the noncompliant PWSs around Lubbock. The location of the treatment  
8 plant, required new pipelines, and potential customers for the Lubbock component of the LARS  
9 are shown on Figure E.3.

10 The plant at Lamesa could tie into the Lubbock distribution system at Lamesa or could be  
11 independent. If tied into the Lamesa system, it could supplement Lamesa’s system to allow the  
12 non-compliant PWSs upstream of Lamesa to withdraw water without impacting existing  
13 customers between Lamesa and Lubbock. If not tied in, the system could serve PWSs outside  
14 the Lamesa area. The location of the treatment plant, required new pipelines, and potential  
15 customers for the Lamesa component of the LARS are shown on Figure E.4.

16 The plant at Brownfield could tie into the Brownfield distribution system at Brownfield or  
17 could be independent. If tied into the Brownfield system, it could supplement Lubbock’s  
18 system to allow the non-compliant PWSs upstream of Brownfield to withdraw water without  
19 impacting existing customers between Brownfield and Lubbock. If not tied in, the system  
20 could serve PWSs outside the Brownfield area. The location of the treatment plant, required  
21 new pipelines, and potential customers for the Brownfield component of the LARS are shown  
22 on Figure E.5.

23 Pipelines could be built to connect the CRMWA lines to the other noncompliant PWSs. In  
24 this way, the Lamesa and Brownfield groundwater treatment plants could provide enough  
25 drinking water to meet the demands of the systems at the ends of the CRMWA lines to offset  
26 water that would be taken out by noncompliant PWSs along the existing CRMWA lines.  
27 Connecting pipelines for the groundwater treatment plants and noncompliant PWSs to the  
28 existing City of Lubbock and CRMWA pipe systems reduces the need for added infrastructure  
29 to implement the regional solution, and would provide operational flexibility.

### 30 **E.3 Estimated Costs**

31 Costs to implement the LARS were estimated. This includes costs for new wells,  
32 pipelines, pump stations, and treatment plants. A conceptual design was developed for the  
33 main infrastructure components, and was used as the basis for estimating capital and O&M  
34 costs. The estimated capital and O&M costs for the major infrastructure components are  
35 summarized in Table E.5. The annualized costs of these components are also shown in  
36 Table E.5, using a 6 percent discount rate and a 20-year period. Details of the capital costs for  
37 the three subareas are included in Tables E.6, E.7, and E.8.

38 Table E.9 presents an estimate of the cost of service to the LARS customers. If the  
39 customers were to bear the total capital and operating costs of the systems for their subarea or  
40 the system as a whole, the approximate monthly cost per connection would be as follows:

LARS-Lubbock:	\$97/month	\$1,163/year	3% of MHI
LARS-Lamesa:	\$233/month	\$2,794/year	7% of MHI
LARS-Brownfield:	\$190/month	\$2,281/year	6% of MHI
Combined:	\$173/month	\$2,079/year	5% of MHI

1 If the systems would be able to get 100 percent grant funding for the capital costs of  
2 constructing the system, the approximate monthly cost per connection would be as follows:

LARS-Lubbock:	\$43/month	\$519/year	1% of MHI
LARS-Lamesa:	\$61/month	\$732/year	2% of MHI
LARS-Brownfield:	\$80/month	\$962/year	3% of MHI
Combined:	\$61/month	\$738/year	2% of MHI

3 This then forms the approximate range of the cost of service for the customers (per  
4 connection) of a regional solution.

5 Increasing the coverage of the regional solution to include populations served by inactive  
6 PWSs or those that have private wells could have the effect of reducing treatment costs on a per  
7 gallon basis, but increasing the cost for distribution piping. Likewise, other sources of water  
8 with associated quality aspects would affect the cost, including surface water sources, better  
9 groundwater sources, and the use of reclaimed water, either for supplemental potable or non-  
10 potable uses. A more detailed assessment would be required to determine whether the overall  
11 effect would be an increase or decrease on the cost to the customers.

## 12 **E.4 Conclusion**

13 A regional solution to serving non-compliant PWSs in the Lubbock area presents a  
14 potentially viable solution to an existing problem. If suitable groundwater can be found, a  
15 regional system could be implemented within a cost per connection range of \$61/month to  
16 \$173/month, with the actual cost depending on the source and costs of capital funds needed to  
17 build a regional system.

18 A Community Development Block Grant is one possible source of funding the capital  
19 costs for the regional solution. Community Development Block Grants are discussed further in  
20 Attachment E1.

## 21 **E.5 Tables and Figures**

**Table E.1**  
**Active Residential Public Water Systems with Potential Water Quality Problems**  
**Lubbock Area Regional Solution**

<b>PWS ID #</b>	<b>PWS Name</b>	<b>Population</b>	<b>Connections</b>	<b>Avg. Daily Consumption (mgd)</b>	<b>County</b>
0170010	BORDEN COUNTY WATER SYSTEM	150	98	0.012	BORDEN
0580011	CITY OF ACKERLY	230	126	0.004	DAWSON
0580013	WELCH WATER SUPPLY CORP	354	115	0.035	DAWSON
0580025	KLONDIKE ISD	207	11	0.025	DAWSON
0830001	SEAGRAVES CITY OF	2396	931	0.344	GAINES
0830011	LOOP WATER SUPPLY CORP	300	113	0.040	GAINES
0830012	SEMINOLE CITY OF	5916	2540	1.410	GAINES
0850002	SOUTHLAND ISD	190	4	0.019	GARZA
1100004	ROPESVILLE CITY OF	517	196	0.094	HOCKLEY
1100010	SMYER CITY OF	480	180	0.051	HOCKLEY
1100011	WHITHARRAL WATER SUPPLY CORP	275	82	0.043	HOCKLEY
1100030	OPDYKE WEST WATER SUPPLY	140	63	0.018	HOCKLEY
1520005	WOLFFORTH CITY OF	3000	1150	0.439	LUBBOCK
1520009	BIG Q MOBILE HOME ESTATES	200	70	0.013	LUBBOCK
1520025	BUSTERS MOBILE HOME PARK	20	8	0.002	LUBBOCK
1520026	FAMILY COMMUNITY CENTER MHP	88	40	0.011	LUBBOCK
1520027	WAGON WHEEL MOBILE VILLAGE HOME PR	30	21	0.003	LUBBOCK
1520036	GREEN MOBILE HOME PARK	50	28	0.004	LUBBOCK
1520039	PECAN GROVE MOBILE HOME PARK	100	50	0.008	LUBBOCK
1520062	PLOTT ACRES	201	63	0.019	LUBBOCK
1520067	114TH STREET MOBILE HOME PARK	96	43	0.009	LUBBOCK
1520080	FRANKLIN WATER SERVICE COMPANY	152	64	0.011	LUBBOCK
1520094	TOWN NORTH VILLAGE WATER SYSTEM	330	117	0.031	LUBBOCK
1520106	COX ADDITION WATER SYSTEM	133	40	0.014	LUBBOCK
1520122	LUBBOCK COOPER ISD	1900	14	0.190	LUBBOCK
1520123	ROOSEVELT ISD	1600	11	0.048	LUBBOCK
1520149	WHORTON MOBILE HOME PARK	75	26	0.008	LUBBOCK
1520152	TOWN NORTH ESTATES	227	67	0.015	LUBBOCK
1520154	CHARLIE BROWNS LEARNING CENTER	47	3	0.005	LUBBOCK
1520155	COUNTRY SQUIRE MHP 2	75	16	0.008	LUBBOCK
1520156	ELM GROVE MOBILE HOME PARK	24	20	0.002	LUBBOCK
1520158	MILLER MOBILE HOME PARK	60	33	0.005	LUBBOCK
1520185	LUBBOCK RV PARK	133	100	0.009	LUBBOCK
1520188	CASEY ESTATES WATER	312	104	0.026	LUBBOCK
1520192	TERRELLS MOBILE HOME PARK	50	22	0.005	LUBBOCK
1520198	VALLEY ESTATES	70	36	0.007	LUBBOCK
1520199	WOLFFORTH PLACE	411	137	0.041	LUBBOCK
1520211	TEXIN ENTERPRISES	26	7	0.008	LUBBOCK
1520217	SOUTHWEST GARDEN WATER	375	125	0.028	LUBBOCK
1520223	PAUL COBB WATER SYSTEM	11	10	0.003	LUBBOCK
1520225	FAY BEN MOBILE HOME PARK	90	44	0.007	LUBBOCK
1520241	MANAGED CARE CENTER	40	5	0.003	LUBBOCK
1520247	COUNTRY VIEW MHP	76	23	0.004	LUBBOCK
1530001	ODONNELL CITY OF	1011	364	0.257	LYNN
1530003	WILSON CITY OF	532	212	0.050	LYNN
1530004	NEW HOME CITY OF	375	180	0.044	LYNN
1530005	GRASSLAND WATER SUPPLY CORP	85	27	0.008	LYNN
2230002	MEADOW CITY OF	547	230	0.138	TERRY
2230003	WELLMAN PUBLIC WATER SYSTEM	225	97	0.010	TERRY
<b>TOTALS</b>		<b>23,932</b>	<b>8,066</b>	<b>3.586</b>	

**Table E.2  
Public Water Systems associated with LARS-Lubbock Treatment Plant**

PWS ID #	PWS Name	Population	Connections	Avg. Daily Consumption (mgd)	County
0850002	SOUTHLAND ISD	190	4	0.019	GARZA
1100010	SMYER CITY OF	480	180	0.051	HOCKLEY
1100011	WHITHARRAL WATER SUPPLY CORP	275	82	0.043	HOCKLEY
1100030	OPDYKE WEST WATER SUPPLY	140	63	0.018	HOCKLEY
1520005	WOLFFORTH CITY OF	3000	1150	0.439	LUBBOCK
1520009	BIG Q MOBILE HOME ESTATES	200	70	0.013	LUBBOCK
1520025	BUSTERS MOBILE HOME PARK	20	8	0.002	LUBBOCK
1520026	FAMILY COMMUNITY CENTER MHP	88	40	0.011	LUBBOCK
1520027	WAGON WHEEL MOBILE VILLAGE HOME PR	30	21	0.003	LUBBOCK
1520036	GREEN MOBILE HOME PARK	50	28	0.004	LUBBOCK
1520039	PECAN GROVE MOBILE HOME PARK	100	50	0.008	LUBBOCK
1520062	PLOTT ACRES	201	63	0.019	LUBBOCK
1520067	114TH STREET MOBILE HOME PARK	96	43	0.009	LUBBOCK
1520080	FRANKLIN WATER SERVICE COMPANY	152	64	0.011	LUBBOCK
1520094	TOWN NORTH VILLAGE WATER SYSTEM	330	117	0.031	LUBBOCK
1520106	COX ADDITION WATER SYSTEM	133	40	0.014	LUBBOCK
1520122	LUBBOCK COOPER ISD	1900	14	0.190	LUBBOCK
1520123	ROOSEVELT ISD	1600	11	0.048	LUBBOCK
1520149	WHORTON MOBILE HOME PARK	75	26	0.008	LUBBOCK
1520152	TOWN NORTH ESTATES	227	67	0.015	LUBBOCK
1520154	CHARLIE BROWNS LEARNING CENTER	47	3	0.005	LUBBOCK
1520155	COUNTRY SQUIRE MHP 2	75	16	0.008	LUBBOCK
1520156	ELM GROVE MOBILE HOME PARK	24	20	0.002	LUBBOCK
1520158	MILLER MOBILE HOME PARK	60	33	0.005	LUBBOCK
1520185	LUBBOCK RV PARK	133	100	0.009	LUBBOCK
1520188	CASEY ESTATES WATER	312	104	0.026	LUBBOCK
1520192	TERRELLS MOBILE HOME PARK	50	22	0.005	LUBBOCK
1520198	VALLEY ESTATES	70	36	0.007	LUBBOCK
1520199	WOLFFORTH PLACE	411	137	0.041	LUBBOCK
1520211	TEXIN ENTERPRISES	26	7	0.008	LUBBOCK
1520217	SOUTHWEST GARDEN WATER	375	125	0.028	LUBBOCK
1520223	PAUL COBB WATER SYSTEM	11	10	0.003	LUBBOCK
1520225	FAY BEN MOBILE HOME PARK	90	44	0.007	LUBBOCK
1520241	MANAGED CARE CENTER	40	5	0.003	LUBBOCK
1520247	COUNTRY VIEW MHP	76	23	0.004	LUBBOCK
1530003	WILSON CITY OF	532	212	0.050	LYNN
1530004	NEW HOME CITY OF	375	180	0.044	LYNN
<b>TOTALS</b>		<b>11,994</b>	<b>3,218</b>	<b>1.209</b>	

**Table E.3  
Public Water Systems associated with LARS-Lamesa Treatment Plant**

PWS ID #	PWS Name	Population	Connections	Avg. Daily Consumption (mgd)	County
0170010	BORDEN COUNTY WATER SYSTEM	150	98	0.012	BORDEN
0580011	CITY OF ACKERLY	230	126	0.004	DAWSON
0580013	WELCH WATER SUPPLY CORP	354	115	0.035	DAWSON
0580025	KLONDIKE ISD	207	11	0.025	DAWSON
1530001	ODONNELL CITY OF	1011	364	0.257	LYNN
1530005	GRASSLAND WATER SUPPLY CORP	85	27	0.008	LYNN
<b>TOTALS</b>		<b>2,037</b>	<b>741</b>	<b>0.341</b>	

**Table E.4  
Public Water Systems associated with LARS-Brownfield Treatment Plant**

PWS ID #	PWS Name	Population	Connections	Avg. Daily Consumption (mgd)	County
0830001	SEAGRAVES CITY OF	2396	931	0.344	GAINES
0830011	LOOP WATER SUPPLY CORP	300	113	0.040	GAINES
0830012	SEMINOLE CITY OF	5916	2540	1.410	GAINES
1100004	ROPESVILLE CITY OF	517	196	0.094	HOCKLEY
2230002	MEADOW CITY OF	547	230	0.138	TERRY
2230003	WELLMAN PUBLIC WATER SYSTEM	225	97	0.010	TERRY
<b>TOTALS</b>		<b>9,901</b>	<b>4,107</b>	<b>2.036</b>	

**Table E.5**  
**Summary of Cost Components**  
**Lubbock Area Regional Solution (LARS)**

<b>Cost Item</b>	<b>Capital</b>	<b>O&amp;M</b>	<b>Annualized 20yr, 6%</b>
<b><i>LARS - Lamesa</i></b>			
Wells	\$ 783,000	\$ 96,638	\$ 164,904
Treatment Plant	\$ 3,126,200	\$ 318,331	\$ 590,887
Pipeline and Pump Stations	\$ 13,615,339	\$ 127,211	\$ 1,314,258
<b>Subtotal</b>	<b>\$ 17,524,539</b>	<b>\$ 542,180</b>	<b>\$ 2,070,049</b>
<b><i>LARS - Brownfield</i></b>			
Wells	\$ 4,698,000	\$ 579,281	\$ 988,874
Treatment Plant	\$ 14,227,400	\$ 1,677,715	\$ 2,918,125
Pipeline and Pump Stations	\$ 43,189,155	\$ 1,694,814	\$ 5,460,241
<b>Subtotal</b>	<b>\$ 62,114,555</b>	<b>\$ 3,951,810</b>	<b>\$ 9,367,240</b>
<b><i>LARS - Lubbock</i></b>			
Wells	\$ 2,740,500	\$ 339,603	\$ 578,533
Treatment Plant	\$ 7,252,900	\$ 871,540	\$ 1,503,881
Pipeline and Pump Stations	\$ 13,778,461	\$ 460,173	\$ 1,661,442
<b>Subtotal</b>	<b>\$ 23,771,861</b>	<b>\$ 1,671,317</b>	<b>\$ 3,743,856</b>
<b>TOTAL</b>	<b>\$ 103,410,955</b>	<b>\$ 6,165,307</b>	<b>\$ 15,181,146</b>

**Table E.6**  
**Lubbock Area Regional Solution - Treatment Plant at Lubbock**  
**Summary of Cost Components**

Item	Quantity	Unit	Capital	O&M
<i>Wells</i>				
New wells	28	EA	\$ 1,890,000	\$ 339,603
Contingency	20%		\$ 378,000	
Design & Constr Management	25%		\$ 472,500	
<b>Subtotal</b>			<b>\$ 2,740,500</b>	<b>\$ 339,603</b>
<i>Treatment</i>				
RO Treatment Plant	1	EA	\$ 5,002,000	\$ 871,540
Contingency	20%		\$ 1,000,400	
Design & Constr Management	25%		\$ 1,250,500	
<b>Subtotal</b>			<b>\$ 7,252,900</b>	<b>\$ 871,540</b>
<i>Pipeline</i>				
4" Pipeline w/complete installation	49.07	Miles	\$ 5,916,959	\$ 12,385
6" Pipeline w/complete installation	3.66	Miles	\$ 622,107	\$ 856
10" Pipeline w/complete installation	2.17	Miles	\$ 612,761	\$ 542
Contingency	20%		\$ 1,430,365	
Design & Constr Management	25%		\$ 1,787,957	
<b>Subtotal</b>			<b>\$ 10,370,149</b>	<b>\$ 13,783</b>
<i>Pump Stations</i>				
Pump Stations	13	EA	\$ 2,350,560	\$ 446,390
Contingency	20%		\$ 470,112	
Design & Constr Management	25%		\$ 587,640	
<b>Subtotal</b>			<b>\$ 3,408,312</b>	<b>\$ 446,390</b>
<b>TOTAL COSTS</b>			<b>\$ 23,771,861</b>	<b>\$ 1,671,317</b>

**Table E.7**

**Lubbock Area Regional Solution - Treatment Plant at Lamesa  
Summary of Cost Components**

<b>Item</b>	<b>Quantity</b>	<b>Unit</b>	<b>Capital</b>	<b>O&amp;M</b>
<i>Wells</i>				
New wells	8	EA	\$ 540,000	\$ 96,638
Contingency	20%		\$ 108,000	
Design & Constr Management	25%		\$ 135,000	
<b>Subtotal</b>			<b>\$ 783,000</b>	<b>\$ 96,638</b>
<i>Treatment</i>				
RO Treatment Plant	1	EA	\$ 2,156,000	\$ 318,331
Contingency	20%		\$ 431,200	
Design & Constr Management	25%		\$ 539,000	
<b>Subtotal</b>			<b>\$ 3,126,200</b>	<b>\$ 318,331</b>
<i>Pipeline</i>				
4" Pipeline w/complete installation	33.30	Miles	\$ 3,097,199	\$ 9,159
6" Pipeline w/complete installation	15.15	Miles	\$ 1,878,740	\$ 4,166
8" Pipeline w/complete installation	22.89	Miles	\$ 4,064,030	\$ 6,294
Contingency	20%		\$ 1,807,994	
Design & Constr Management	25%		\$ 2,259,992	
<b>Subtotal</b>			<b>\$ 13,107,955</b>	<b>\$ 19,618</b>
<i>Pump Stations</i>				
Pump Stations	5	EA	\$ 349,920	\$ 107,592
Contingency	20%		\$ 69,984	
Design & Constr Management	25%		\$ 87,480	
<b>Subtotal</b>			<b>\$ 507,384</b>	<b>\$ 107,592</b>
<b>TOTAL COSTS</b>			<b>\$ 17,524,539</b>	<b>\$ 542,180</b>

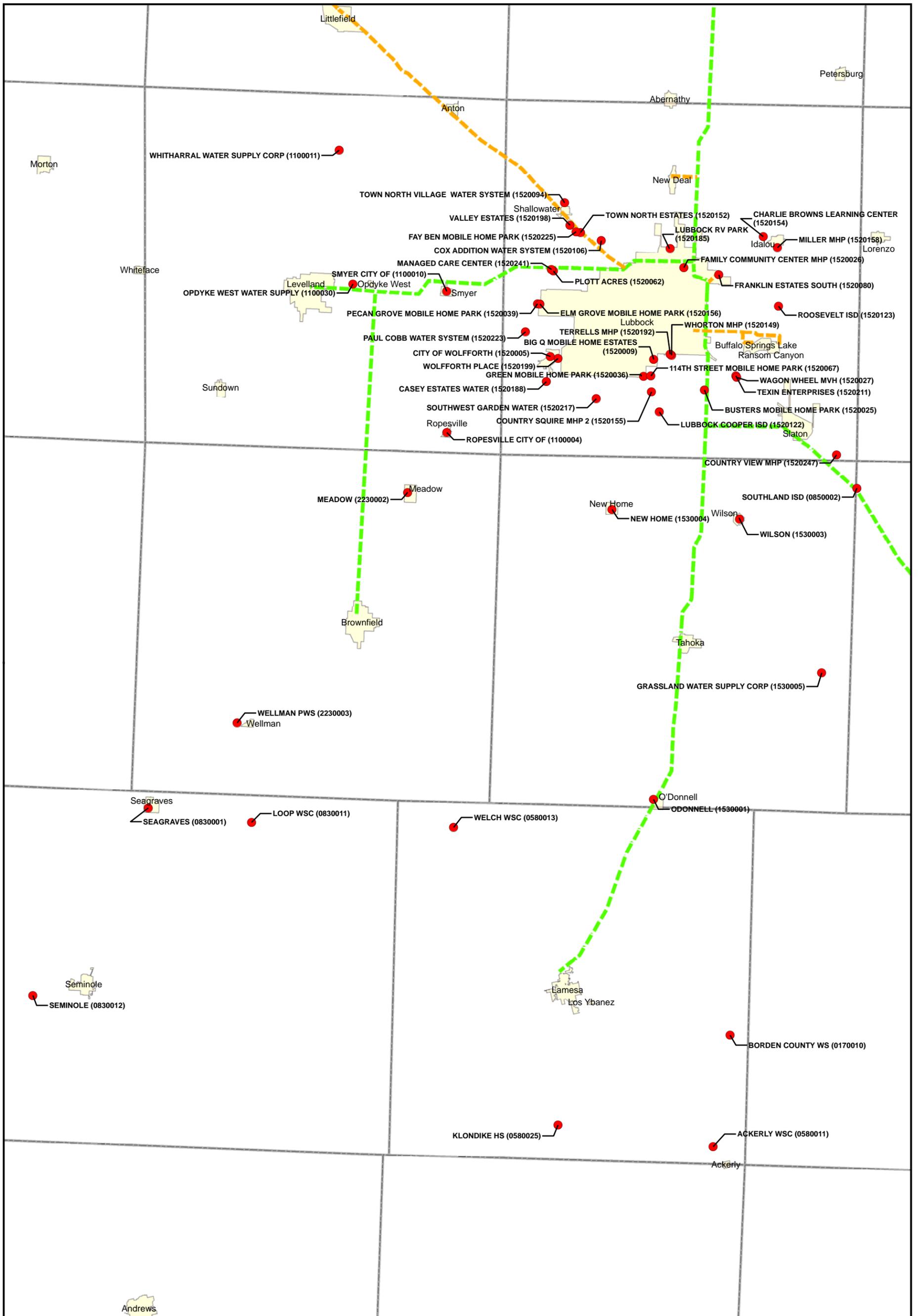
**Table E.8**  
**Lubbock Area Regional Solution - Treatment Plant at Brownfield**  
**Summary of Cost Components**

Item	Quantity	Unit	Capital	O&M
<i>Wells</i>				
New wells	48	EA	\$ 3,240,000	\$ 579,281
Contingency	20%		\$ 648,000	
Design & Constr Management	25%		\$ 810,000	
<b>Subtotal</b>			<b>\$ 4,698,000</b>	<b>\$ 579,281</b>
<i>Treatment</i>				
RO Treatment Plant	1	EA	\$ 9,812,000	\$ 1,677,715
Contingency	20%		\$ 1,962,400	
Design & Constr Management	25%		\$ 2,453,000	
<b>Subtotal</b>			<b>\$ 14,227,400</b>	<b>\$ 1,677,715</b>
<i>Pipeline</i>				
4" Pipeline w/complete installation	3.43	Miles	\$ 294,666	\$ 943
6" Pipeline w/complete installation	16.36	Miles	\$ 2,032,204	\$ 4,499
8" Pipeline w/complete installation	1.01	Miles	\$ 209,900	\$ 276
24" Pipeline w/complete installation	16.66	Miles	\$ 9,251,686	\$ 4,583
30" Pipeline w/complete installation	24.72	Miles	\$ 17,298,093	\$ 6,798
Contingency	20%		\$ 5,817,310	
Design & Constr Management	25%		\$ 7,271,637	
<b>Subtotal</b>			<b>\$ 42,175,496</b>	<b>\$ 17,099</b>
<i>Pump Stations</i>				
Pump Stations	6	EA	\$ 699,075	\$ 192,017
Contingency	20%		\$ 139,815	
Design & Constr Management	25%		\$ 174,769	
<b>Subtotal</b>			<b>\$ 1,013,659</b>	<b>\$ 192,017</b>
<b>TOTAL COSTS</b>			<b>\$ 62,114,555</b>	<b>\$ 2,466,112</b>

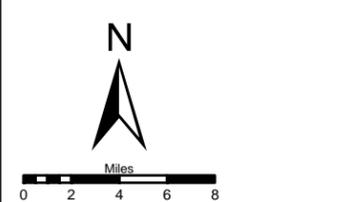
**Table E.9**  
**Lubbock Area Regional Solution (LARS)**  
**Cost of Service**

Component	Lubbock	Lamesa	Brownfield	Combined
Capital Cost	\$ 23,771,860.83	\$ 17,524,538.78	\$ 62,114,554.96	\$ 103,410,954.58
Annual O&M	\$ 1,671,316.90	\$ 542,180.24	\$ 3,951,810.23	\$ 6,165,307.37
Annualized 20 yr., 6%	\$ 3,743,856.06	\$ 2,070,049.39	\$ 9,367,240.19	\$ 15,181,145.64
Population	11,994	2,037	9,901	\$ 23,932.00
Connections	3,218	741	4,107	\$ 8,066.00
Annualized/Population	\$ 312.14	\$ 1,016.22	\$ 946.09	\$ 758.15
Annualized/Connection	\$ 1,163.41	\$ 2,793.59	\$ 2,280.80	\$ 2,079.27
Annualized/Connection as % of MHI*	3.05%	7.36%	6.00%	5.47%
<b>Annualized/Connection/Month</b>	<b>\$ 96.95</b>	<b>\$ 232.80</b>	<b>\$ 190.07</b>	<b>\$ 173.27</b>
Annual O&M/Population	\$ 139.35	\$ 266.17	\$ 399.13	\$ 268.21
Annual O&M/Connection	\$ 519.37	\$ 731.69	\$ 962.21	\$ 737.76
Annual O&M/Connection as % of MHI*	1.35%	1.91%	2.52%	1.93%
<b>Annual O&amp;M/Connection/Month</b>	<b>\$ 43.28</b>	<b>\$ 60.97</b>	<b>\$ 80.18</b>	<b>\$ 61.48</b>

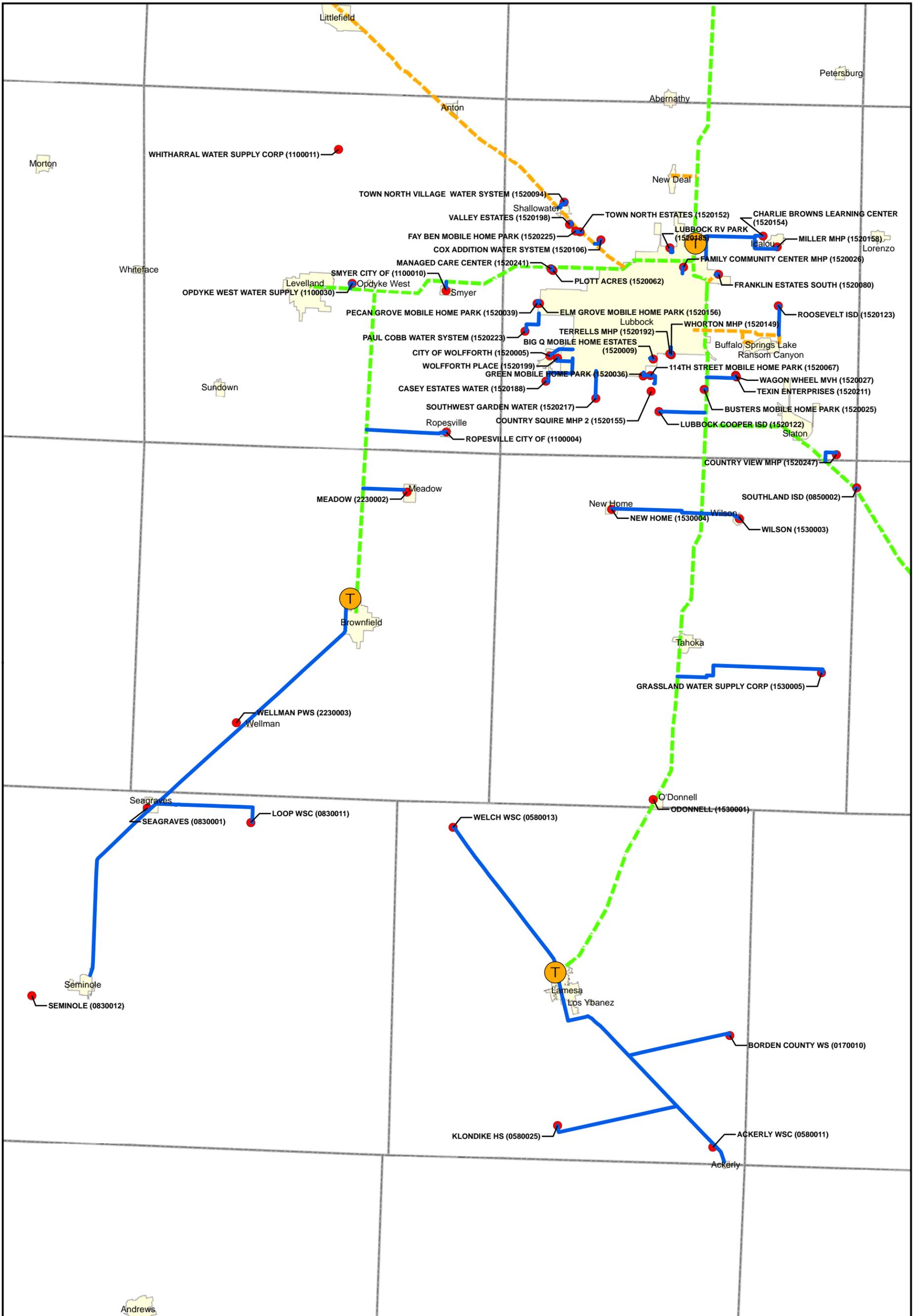
\* The "percentage of MHI" is based on the MHI from the 2000 Census for Lubbock County and the census value has been marked up to reflect 2006 inflation adjusted dollars at \$37,863.



**Figure E.1**  
**EXISTING INFRASTRUCTURE & ACTIVE RESIDENTIAL PWS's WITH POTENTIAL WATER QUALITY PROBLEMS**



- Legend**
- PWS
  - — — CRMWA Pipeline
  - — — Lubbock Pipeline
  - Major Road
  - City Limits
  - Counties

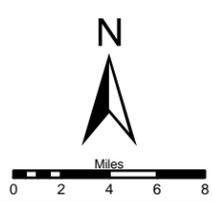


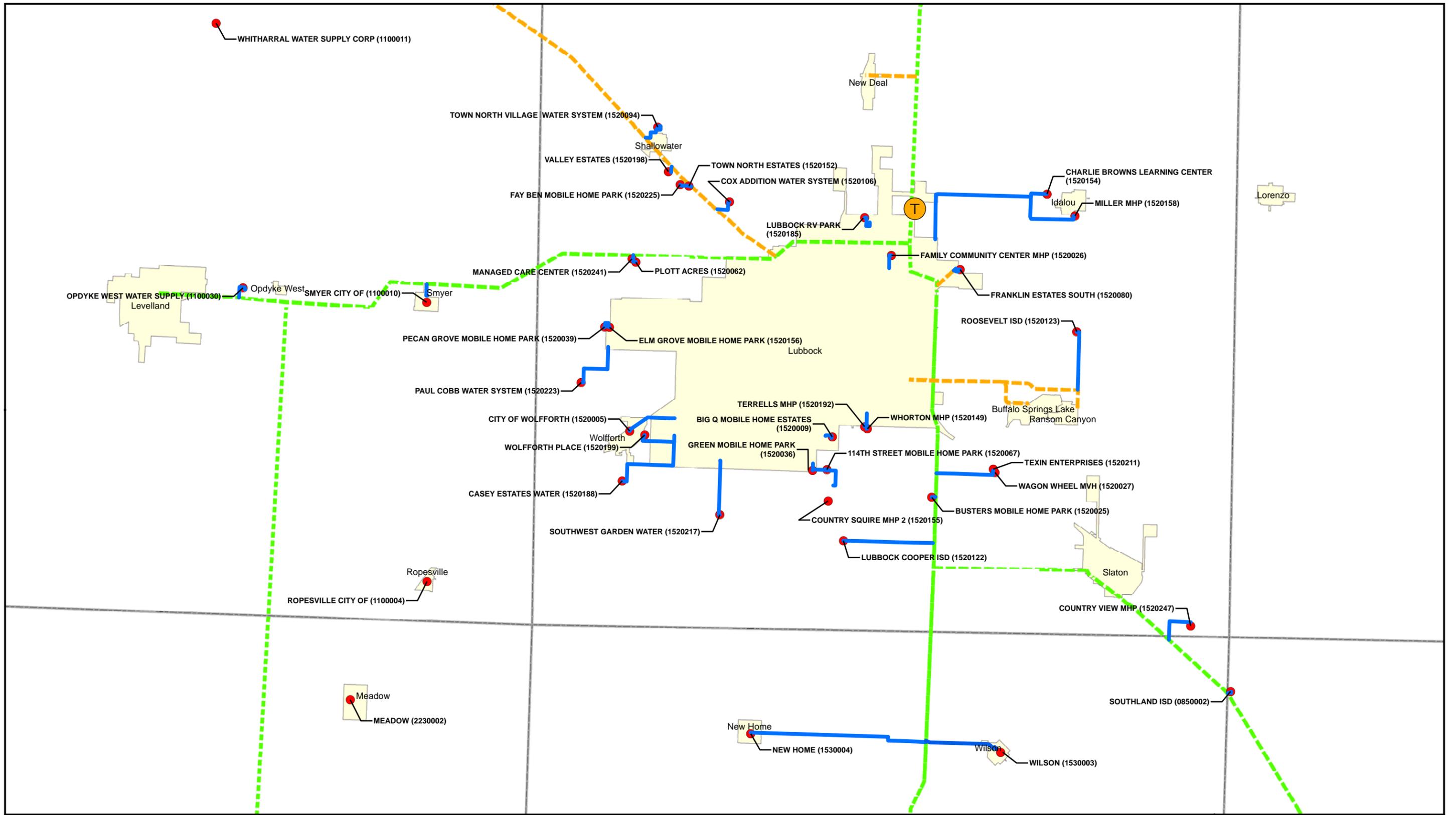
**Figure E.2**

**PROPOSED LUBBOCK AREA REGIONAL SOLUTION**

**Legend**

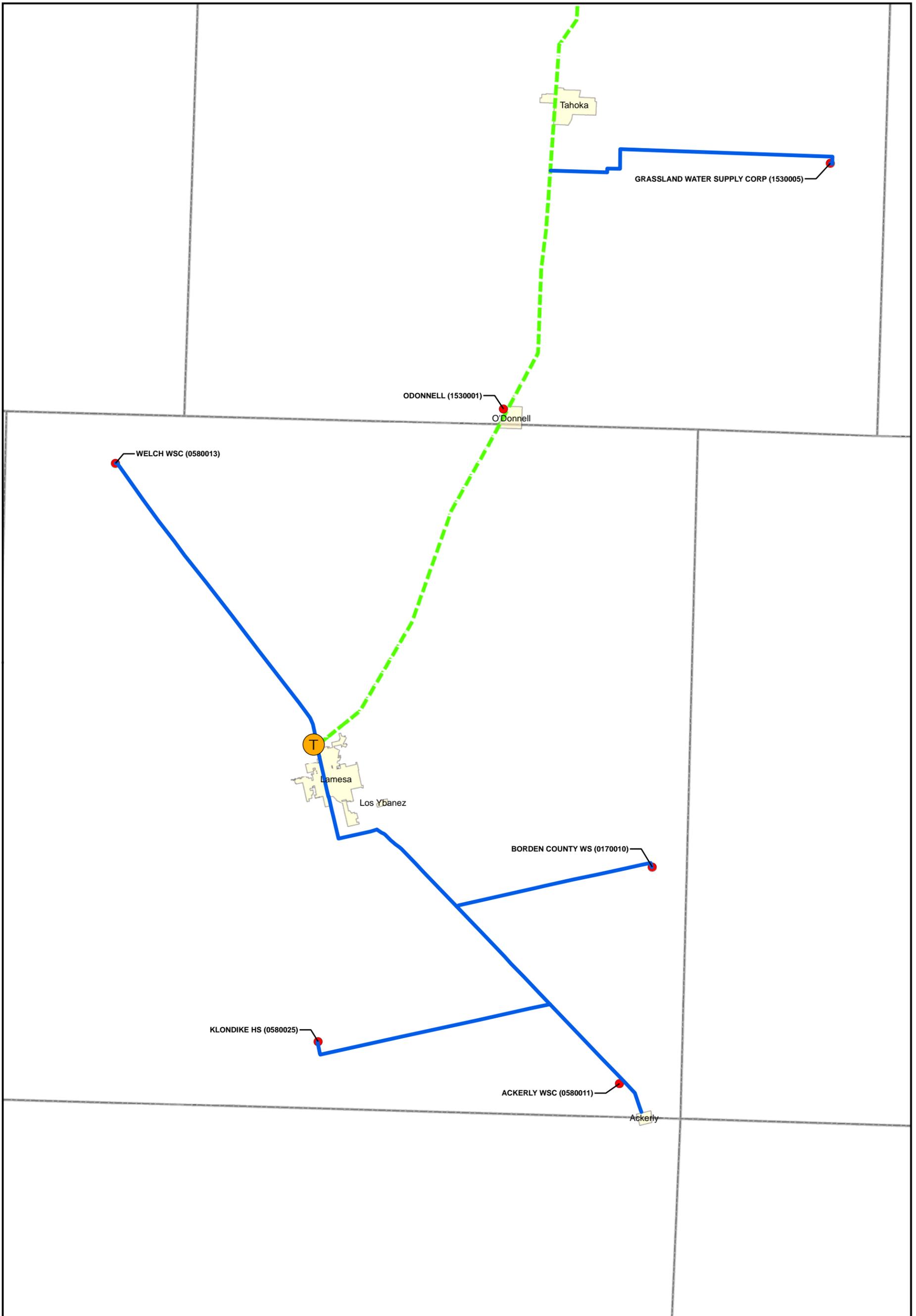
- PWS
- - - CRMWA Pipeline
- - - Lubbock Pipeline
- Major Road
- City Limits
- Counties
- Proposed LARS Pipeline
- T Proposed LARS Treatment Plant



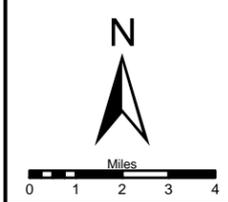


**Figure E.3**

**LUBBOCK PLANT & ASSOCIATED PWS's**  
Lubbock Area Regional Solution



**Figure E.4**  
**LAMESA PLANT & ASSOCIATED PWS's**  
 Lubbock Area Regional Solution



- Legend**
- PWS
  - - - CRMWA Pipeline
  - Lubbock Pipeline
  - Major Road
  - City Limits
  - Counties
  - Proposed LARS Pipeline
  - T Proposed LARS Treatment Plant

Sundown

Ropesville

ROPESVILLE CITY OF (1100004)

Meadow

MEADOW (2230002)

T

Brownfield

Wellman

WELLMAN PWS (2230003)

Seagraves

SEAGRAVES (0830001)

LOOP WSC (0830011)

Seminole

SEMINOLE (0830012)

Figure E.5

BROWNFIELD PLANT & ASSOCIATED PWS's  
Lubbock Area Regional Solution

Legend

- PWS
- CRMWA Pipeline
- Lubbock Pipeline
- Major Road
- City Limits
- Counties
- Proposed LARS Pipeline
- T Proposed LARS Treatment Plant



**Attachment E1**

**Texas Community Development Block Grants**

**Introduction**

Every year, the U.S. Department of Housing and Urban Development (HUD) provides federal Community Development Block Grant (CDBG) funds directly to states, which, in turn, provide the funds to small, rural cities with populations of less than 50,000, and to counties that have a non-metropolitan population under 200,000 and are not eligible for direct funding from HUD. These small communities are called “non-entitlement” areas because they must apply for CDBG dollars through state agencies. The grants may be used for community and economic development activities, but are primarily used for housing rehabilitation, wastewater and drinking water facilities, public works facilities, and economic development. Seventy percent of grant funds must be used for activities that principally benefit low to moderate-income persons.

CDBG funds are administered through the Office of Rural Community Affairs (ORCA) and the Texas Department of Agriculture (TDA). ORCA administers the Texas Community Development Block Grant Program (Texas CDBG) and TDA administers the Texas Capital Fund through an interagency agreement between ORCA and TDA. ORCA was created not only to focus on rural issues, but to monitor government performance, research problems and find solutions, and to coordinate rural programs among state agencies. TDA offers the infrastructure development program as part of the Texas Capital Fund which provides assistance with public infrastructure projects needed to by businesses to create or retain jobs for low and moderate income persons.

ORCA’s CDBG program of Texas is the largest in the nation. The rural-focused program serves approximately 1,017 eligible rural communities, 245 rural counties, and provides services to over 375,000 low- to moderate-income beneficiaries each year. Of the 1,017 communities eligible for CDBG funds, 740 have a population of less than 3,000, and 424 have a population of less than 1,000. The demographics and rural characteristics of Texas have shaped a program that focuses on providing basic human needs and sanitary infrastructure to small rural communities in outlying areas.

**Eligible Applicants**

Eligible applicants are nonentitlement general purpose units of local government, including cities and counties that are not participating or designated as eligible to participate in the entitlement portion of the federal CDBG. Nonentitlement cities that are not participating in urban county programs through existing participation agreements are eligible applicants (unless the city’s population is counted toward the urban county CDBG allocation).

Nonentitlement cities are located predominately in rural areas and are cities with populations less than 50,000 thousand persons; cities that are not designated as a central city of a metropolitan statistical area; and cities that are not participating in urban county programs. Nonentitlement counties are also predominately rural in nature and are counties that generally have fewer than 200,000 persons in the nonentitlement communities and unincorporated areas located in the county.

## 1 **Eligible Activities**

2 Eligible activities under the Texas CDBG Program are listed in 42 United States Code  
3 (USC) Section 5305. The Texas CDBG staff reviews all proposed project activities included in  
4 applications for all fund categories. The Texas Department of Agriculture determines the  
5 eligibility of activities included in Texas Capital Fund (TCF) applications.

6 All proposed activities must meet one of the following three National Program Objectives:

- 7 1. Benefit principally low- and moderate-income persons; or
- 8 2. Aid in the elimination of slums or blight; or
- 9 3. Meet other community development needs of particular urgency that represent  
10 an immediate threat to the health and safety of residents of the community.

## 11 **Ineligible Activities**

12 In general, any type of activity not described or referred to in 42 USC Section 5305 is  
13 ineligible. Specific activities ineligible under the Texas CDBG Program are:

- 14 1. Construction of buildings and facilities used for the general conduct of government  
15 (*e.g.*, city halls, courthouses, *etc.*);
- 16 2. Construction of new housing, except as last resort housing under 49 CFR Part 24 or  
17 affordable housing through eligible subrecipients in accordance with 24 CFR  
18 570.204;
- 19 3. Financing of political activities;
- 20 4. Purchases of construction equipment (except in limited circumstances under the  
21 Small Towns Environment Program);
- 22 5. Income payments, such as housing allowances; and
- 23 6. Most O&M expenses (including smoke testing, televising/video taping line work, or  
24 any other investigative method to determine the overall scope and location of the  
25 project work activities)

26 The TCF will not accept applications in support of public or private prisons, racetracks,  
27 and projects that address job creation/retention through a government supported facility. The  
28 TCF Program may be used to financially assist/facilitate the relocation of a business when  
29 certain requirements, as defined in the application guidelines, are met.

## 30 **Primary Beneficiaries**

31 The primary beneficiaries of the Texas CDBG Program are low to moderate income  
32 persons as defined under HUD, Section 8 Assisted Housing Program (Section 102(c)). Low  
33 income families are defined as those earning less than 50 percent of the area MHI. Moderate

1 income families are defined as those earning less than 80 percent of the area MHI. The area  
2 median family can be based on a metropolitan statistical area, a non-metropolitan county, or the  
3 statewide non-metropolitan MHI figure.

#### 4 **Section 108 Loan Guarantee Program**

5 Section 108 is the loan guarantee provision of the Texas CDBG Program. Section 108  
6 provides communities with a source of financing for economic development, housing  
7 rehabilitation, public facilities, and large-scale physical development projects. This makes it  
8 one of the most potent and important public investment tools that HUD offers to local  
9 governments. It allows these local governments to transform a small portion of their CDBG  
10 funds into federally guaranteed loans large enough to pursue physical and economic  
11 revitalization projects that can renew entire neighborhoods. Such public investment is often  
12 needed to inspire private economic activity, providing the initial resources, or simply the  
13 confidence that private firms and individuals may need to invest in distressed areas.  
14 Section 108 loans are not risk-free; however, local governments borrowing funds guaranteed by  
15 Section 108 must pledge their current and future CDBG allocations to cover the loan amount as  
16 security for the loan.

17 The loan is made by a private lender to an eligible nonentitlement city or county. HUD  
18 guarantees the loan; however, Texas CDBG must pledge the state's current and future CDBG  
19 nonentitlement area funds to cover any losses. To provide eligible nonentitlement communities  
20 an additional funding source, the State is authorizing a loan guarantee pilot program for 2008  
21 consisting of one application up to a maximum of \$500,000 for a particular project. An  
22 application guide containing the submission date and qualifications will be available for  
23 applicants interested in being selected as the pilot project under this program.