Comprehensive Compliance Investigations

Addendum 5

(Revision 3)

to the

Quality Assurance Project Plan for the Texas Commission on Environmental Quality Public Water System Supervision Program Relating to the Safe Drinking Water Act

Effective:

May 10, 2026

Group A: Project Management and Information/Data Quality Objectives Elements

A2 – Approval Page

The following individuals are signatories on this QAPP Addendum because they are responsible for the management and assurance of the quality of the work described.

A2.1 TCEQ/Office of Compliance and Enforcement (OCE)/Regional Areas

A2.1.1 Central Texas Area

Joel Anderson, Area Director, Central Texas Area

Signature: Joel Anderson Date: 4/2/2026

A2.1.2 Coastal and East Texas Area

Susan Clewis, Area Director, Coastal and East Texas Area

Signature: Susan Clewis Date: 4/2/2026

A2.1.3 North Central and West Texas Area

Randy J. Ammons, Area Director, North Central and West Texas Area

Signature: Randy J Ammons Date: 4/1/2026

A2.1.4 Border and Permian Area

David A. Ramirez, Area Director, Border and Permian Area

Signature: David Ramirez Date: 4/2/2026

A2.2 TCEQ/OCE/Program Support

Melissa Keller, Deputy Director, Program Support & Environmental Assistance Division

Signature: Melissa Keller Date: 03/31/2026

A2.3 TCEQ/Office of Water/Water Supply Division

Jessica Hoch, PWSS Program Lead Quality Assurance Specialist (QAS)

Signature: _____ Date: 03/16/2026

A3 Table of Contents, Document Format, and Document Control

A3.1 Table of Contents

Group A: Project Management and Information/Data Quality Objectives Elements 2

A2 Approval Page 2
A3 Table of Contents, Document Format, and Document Control 8
A4 Project Purpose, Problem Definition, and Background 10
A5 Project Task Description 10
A6 Information/Data Quality Objectives and Performance/Acceptance Criteria 12
A7 Distribution List 14
A8 Project Organization 14
A9 Project Quality Assurance Manager Independence 15
A10 Project Organizational Chart and Communications 15
A11 Personnel Training/Certification 15
A12 Documents and Records 16

Group B: Implementing Environmental Information Operations 18

B1 Identification of Project Environmental Information Operations 18
B2 Methods for Environmental Information Acquisition 18
B3 Integrity of Environmental Information 19
B4 Quality Control 19
B5 Instrument/Equipment Calibration, Testing, Inspection and Maintenance 20
B6 Inspection/Acceptance of Supplies and Services 20
B7 Environmental Information Management 20

Group C: Assessment, Response Actions and Oversight 20

C1 Assessments and Response Actions 20
C2 Oversight and Report to Management 21

Group D: Environmental Information Review and Usability Determination 21

D1 Environmental Information Review 21
D2 Useability Determination 22

A3.2 Table of Figures

Table 1 Eight Elements of a Sanitary Survey 11
Table 2 QAPP Addendum Distribution List 14
Table 3 CCI Documents and Records 16

A3.3 List of Acronyms

CFR	Code of Federal Regulations
CCI	comprehensive compliance investigation
CCEDS	Consolidated Compliance and Enforcement Data System
CA	corrective action
COC	chain of custody
DOC	Demonstration of Capability
DSHS	Department of State Health Services
DWQT	Drinking Water Quality Team
DWSG	Drinking Water Sampling Guide
FB	field blank
IDAC	individual demonstration of analytical capability
ID	identification
LFB	laboratory fortified blank
LFM	laboratory fortified matrix
LIMS	Laboratory Information Management System
LQAS	Laboratory Quality Assurance Section
LRB	laboratory reagent blank
MD	Monitoring Division
NOE	notice of enforcement
NOV	notice of violation
NPDWR	National Primary Drinking Water Regulations
NSDWR	National Secondary Drinking Water Regulations
OSHA	Occupational Safety and Health Administration
OCE	Office of Compliance and Enforcement
OLS	Operator Licensing Section
OW	Office of Water
PDP	personal development plan
PSEAD	Program Support and Environmental Assistance Division
PTRS	Plan and Technical Review Section
PWS	public water system
PWSS	Public Water System Supervision
QA	quality assurance
QAPP	Quality Assurance Project Plan
QC	quality control
QMP	Quality Management Plan
RG	regulatory guidance
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
SOP	standard operating procedure
SWP	source water protection
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
WSD	Water Supply Division

A4 Project Purpose, Problem Definition, and Background

The State of Texas has primacy for implementing the SDWA of 1974 and its associated federal regulations. As part of this, the TCEQ conducts sanitary surveys (see note below) pursuant to the SDWA. A sanitary survey is defined in 30 TAC §290 Subchapter D as an onsite review of a public water system's (PWS) adequacy for producing and distributing safe drinking water by evaluating the following elements.

- water source
- treatment
- distribution system
- finished water storage
- pump, pump facilities, and controls
- monitoring, reporting, and data verification
- system management, operation, and maintenance
- operator compliance

Note: In Texas, TCEQ uses the term PWS Comprehensive Compliance Investigation (CCI) in place of PWS Sanitary Survey. For federal reporting, the term "sanitary survey" is used.

PWS CCIs are conducted to determine a facility's capacity to deliver drinking water on a sustainable basis. They are also conducted to identify and correct water facilities' physical and operational weaknesses. CCIs are a proactive public health measure that can identify deficiencies in PWSs before contamination of public drinking water occurs. CCIs are carried out to achieve the following goals:

- Identify systems needing technical or capacity development assistance.
- Reduce the risk of waterborne disease by identifying significant deficiencies.
- Provide an opportunity to educate system operators.
- The EPA requires that the primacy agency (TCEQ) perform sanitary surveys (CCIs) of PWSs. CCIs must be performed every three years on community water systems and every five years on non-community water systems.

Activities conducted as part of CCIs are environmental data operations as defined in the Programmatic QAPP. As such, the QA processes regarding organization, planning, implementation, and assessment are documented in this QAPP Addendum which is reviewed and approved by the EPA. This document is written as an addendum to the PWSS Programmatic QAPP to facilitate its management, review, and future revision.

A5 Project Task Description

TCEQ regional investigators complete a CCI report with every inspection of a PWS that includes the data and information collected during the investigation. This information is stored in the Comprehensive Compliance and Enforcement Data System (CCEDS).

Investigations capture the inventory components required by the EPA, including sources of raw water, type of public water system, population, connections, capacity, responsible official, and responsible official's address. Inventory data are also received directly from PWSs or from the Sampling Contractor in the form of a field report.

Prior to the start of each fiscal year, the TCEQ OCE PSEAD generates each Region's list of active PWSs. The list identifies the PWSs that need to be investigated in the next fiscal year and PWSs that have never had an investigation performed because of their activity dates. Each OCE Regional Office Water Section Manager develops the Region's work plan for PWSs that are scheduled to be investigated that fiscal year. Community PWSs are generally inspected every three years and non-community PWSs are inspected every five years. PWSs are inspected sooner if there are complaints or other deficiencies.

Field investigators notify PWSs 1 to 14 days prior to the CCI investigation. Each CCI is designed to address the components described above. During the CCI, the assigned field investigator reviews, examines, verifies, and analyzes records to ensure the proper procedures are being met according to TCEQ's 30 TAC §290 rules and regulations. This includes calibration records that ensure all equipment meets laboratory equipment rules. The eight components of a sanitary survey, incorporated into a CCI, are defined in Table 1.

Along with a review of records, the field investigator physically inspects the:

- intruder-resistant fence
- well and storage tank
- pressure tank
- service pumps
- treatment system

At the end of the onsite investigation, the field investigators conduct an exit interview with the PWS Responsible Party or Representative. During this exit interview, previous and current deficiencies are discussed, and an exit interview form is provided to the PWS. The TCEQ CCIs typically take up to 60 days to conduct from start to finish.

Based on the findings, a notice of violation (NOV), notice of enforcement (NOE), or a compliance letter is written by the field investigator within roughly 60 days of the CCI. The letter is sent to the Region's assigned QA/QC staff for review. Once the report and letter are reviewed and approved, the Region's water section manager, team leader, or work leader signs and sends it to the PWS via mail or email. Implementation of CCI corrective action (CA) is outside the QAPP scope.

Table 1 Eight Elements of a Sanitary Survey

EPA Sanitary Survey Required Element	CCI Element	Other TCEQ Functionality
Confirm existence of and describe all active and inactive sources under control of PWS	Yes	Locational data gathered and maintained by WSD. Technical assistance related to SWP provided by WSD

EPA Sanitary Survey Required Element	CCI Element	Other TCEQ Functionality
Review and record all treatment used by the PWS	Yes	Disinfection zones established, tracked by WSD. Training modules on treatment provided by OLS, WSD
Review geographic extent of and records related to the distribution system, including population served	Yes	Distribution sample sites approved, tracked by WSD. Compliance with standards tracked, acted on by WSD
Review finished water storage facilities throughout system	Yes	Special assistance provided by WSD for alternate capacity requirements, exceptions.
Review pumps, pump facilities, and controls at systems	Yes	Special assistance provided by WSD for alternate capacity requirements, exceptions.
Review monitoring and reporting and perform data verification for system	Yes	WSD provides primary review of documentation of primary drinking water standards. WSD provides compliance and technical assistance related to standards
Review system management and operation	Yes	Financial, managerial, and technical assistance managed under the WSD.
Review operator compliance with state requirements	Yes	OLS is primarily responsible for establishing record of licensed operators, assigning license numbers.

A6 Information/Data Quality Objectives and Performance/Acceptance Criteria

TCEQ's objective for CCI activities is to produce data/information consistent with the overall objective of the SDWA to protect drinking water and public health. Consequently, as the state's environmental agency, the TCEQ can provide better protection of the health of all Texas citizens currently served by the PWSs and all those who consume water from the systems.

The specific objectives related to CCIs as described below reflect the objectives specified in the Programmatic QAPP. The PWSS Program's goal for quality objectives related to activities taken by the TCEQ for CCIs, is to produce data and information of a known and verifiable quality that will meet the overall objectives of the SDWA.

The following data quality objectives apply to activities related to CCIs. Data quality objectives are met through a combination of the following: management oversight, peer review and management review of letters and reports, staff training, experience, and coordination, TCEQ guidance documents available to the public, TCEQ SOPs, data security processes, standardized review processes pursuant to the SDWA, CCI checklists, reporting protocols, corrective action procedures, and strict adherence to schedules and allotted timeframes. TCEQ relies on data of this quality and sets requirements and performance standards accordingly to ensure it makes valid, fair, and defensible compliance conclusions.

A6.1 Accuracy

Accuracy is a reflection of correctness. To be accurate, CCIs must be unique to each PWS, logical, and representative of the real world. This ensures corrective actions are targeted to actual problems within the PWS.

A6.2 Comparability

Comparability refers to the degree in which methods or data sets are considered to be similar under similar circumstances. CCIs must be comparable to ensure consistent CCIs over time so that changes in results reflect changes in the environment and problems within the PWS.

A6.3 Completeness

The completeness of the data is basically a relationship of how much of the data or information is available for use compared to the total potential data. CCIs must be complete and contain all the requisite data (including water quality data) to produce a meaningful report and target valid CAs.

A6.4 Representativeness

Representativeness refers to the degree to which the data and information accurately represent a specific variable in the population—how well the data reflects the conditions where it was collected.

A6.5 Data Integrity

CCI data and information are managed in such a way to ensure the confidentiality, integrity, and availability of data and information. Data management policies and procedures ensure data and information are recoverable and only used for their intended purposes.

A6.6 Compliance

All TCEQ requirements associated with CCIs have been developed to be consistent with state rules and federal regulations pursuant to the SDWA. This ensures all compliance and enforcement actions taken by the TCEQ are fair and justifiable.

Note: CCIs often involve the collection of measurement data from at least one sample site within the distribution system. This is accomplished by collecting independent chlorine residual measurements or side-by-side measurement comparisons to ensure that PWS operators calibrate equipment and take measurements according to 30 TAC §290.46(s)(2)(C). This is to ensure that minimum chlorine residuals in each finished water storage tank and throughout the distribution system are measured, maintained, and always reported appropriately.

See Section B4 for measurement performance and data acceptance criteria as they pertain to side-by-side comparisons of PWS measurements during CCIs.

A7 Distribution List

The PWSS Program Lead Quality Assurance Specialist ensures the QAPP main document, this QAPP Addendum, and any subsequent revisions are distributed to the project participants listed in Table 2.

The OCE Public Drinking Water Liaison ensures all other project participants, including Water Section Managers and PWS Field Investigators in all Regions, receive this QAPP Addendum.

Table 2 QAPP Addendum Distribution List

QAPP Recipients	Title	Contact Information
Melissa Keller	Program Support and Environmental Assistance Division Deputy Director	melissa.keller@tceq.texas.gov
Renae DiGuardi-Yates	Team Leader, Field Support Team	renae.diguardi@tceq.texas.gov
Kelli Sleger	OCE Public Drinking Water Liaison	Kelli Sleger@tceq.tceq.gov
Joel Anderson	Area Director, Central Texas Area	joel.anderson@tceq.texas.gov
Susan Clewis	Area Director, Coastal and East Texas Area	Susan.Clewis@tceq.texas.gov
Randy J. Ammons	Area Director, North Central and West Texas Area	Randy.Ammons@tceq.texas.gov
David A. Ramirez	Area Director, Border and Permian Area	David.Ramirez@tceq.texas.gov

The current version of the Programmatic QAPP and all addenda are on the TCEQ PWSSP[1] webpage.

A8 Project Organization

Section A8 of the QAPP main document describes roles and responsibilities of TCEQ individuals in WSD management positions, including the PWSS Program Lead Quality Assurance Specialist, Deputy Directors, etc.

The individual/groups listed below manage, administer, and participate directly in the stated activities related to CCIs.

A8.1 Field Support Team, Team Leader, OCE PSEAD

Ensures consistency of OCE Region Water Programs activities with EPA requirements for inventory data generation and CCIs in the Border and Permian Basin, Central Texas, Coastal and East Texas, and North Central and West Texas Areas.

A8.2 OCE Public Drinking Water Liaison

Serves as the Liaison between the TCEQ/OCE/PSEAD and OW/WSD staff by providing

[1] https://www.tceq.texas.gov/drinkingwater/pwss.html

the WSD with OCE procedural updates; providing the OCE with sample collection and PWS data requirement updates from the WSD; participating in rule changes related to the SDWA; conveying SDWA rule changes to regional staff; negotiating appropriate procedural and policy changes as programmatic needs require; and coordinating corrective action between the PWSS Program Lead Quality Assurance Specialist and OCE.

A8.3 OCE PSEAD Training Coordinator

Responsible for coordinating OCE Region PWS training along with the PWS Committee to ensure consistency across the regions.

A8.5 Water Section Managers, Sixteen Regional Field Offices

Responsible for monitoring the work associated with conducting CCIs at PWSs. This includes the schedule, activities, field investigator reports, and corrective actions.

A8.6 Field Investigators

The TCEQ OCE field investigators perform CCIs and actions including, but not limited, to entering inspection data/information into the Consolidated Compliance and Enforcement Data System (CCEDS), preparing investigation reports, compliance determinations, corresponding with the PWSs, and referring PWSs for enforcement, as necessary.

A9 Project Quality Assurance Manager Independence

The Project Quality Assurance Manager (QAM) is the PWSSP Lead QAS. The project QAM independence is described within the Programmatic QAPP.

A10 Project Organizational Chart and Communications

Described within the Programmatic QAPP.

A11 Personnel Training/Certification

TCEQ personnel performing work on this project are qualified/trained to perform their assigned work per the TCEQ QMP and Section A11 of the Programmatic QAPP document.

A11.1 PWS Field Investigator Training

Training programs and qualification requirements specific to field investigators are specified in the most recent version of the PWS Investigator's Manual (See Table 3). Depending on the level (basic or senior), professional development plans (PDP) require a combination of safety training and health monitoring, on the job training, formal training courses, and required demonstrations of proficiency with sampling and monitoring equipment. Training includes, but is not limited to the following items:

- Agency training including Effective Time Management, Emotional Intelligence, etc.

- Occupational Safety and Health Administration (OSHA), 29 Code of Federal Regulations (CFR) Section §1910.120 40-hour certification, and current 8-hour refresher training.
- Driving safety.
- Annual PWS Programmatic Training (see Section A11.2).
- Comprehensive OCE Equipment Training (see Section A11.3).
- Continuing education classes offered by the Texas Rural Water Association, Texas Water Utilities Association, Texas A&M Engineering Extension Service, etc.

A11.2 Annual PWS Programmatic Training

OCE hosts programmatic training on even numbered years for advanced field investigators and on odd numbered years for all investigators. The WSD participates as requested. These training courses are very comprehensive and involve both general and break-out sessions, as well as field trips. Training agendas vary year-to-year but may include the following types of topics.

- pre-investigation planning
- groundwater CCIs
- surface water CCIs
- pressure complaints
- backflow and cross-connection control
- water quality complaints
- corrosivity evaluation
- PWSS Program updates on rules

A11.3 Comprehensive OCE Equipment Training

All field investigators take OCE equipment training to ensure that they can collect valid and defensible environmental measurement data and demonstrate proficiency in the use of equipment by successfully completing an Initial Demonstration of Capability/Continuing Demonstration of Capability (IDC/CDC) as specified in the Field Operation SOP Investigation Guidance (see Table 3).

Field investigator PDPs documenting basic and senior level training are maintained by the OCE PSEAD.

A12 Documents and Records

The documents and records that describe, specify, report, or certify field and laboratory activities are listed in Table 3. Official state records produced as a part of work under this addendum are retained as described within the Programmatic QAPP.

Table 3 CCI Documents and Records

Document or Record	Purpose	Format/Location
Guidance Document for Field Operations Investigations of Complaints	Guidance for TCEQ staff when there is an event which the complainant alleges a possible environmental, health, and/or regulatory concern and the complainant is requesting action to be taken by the TCEQ	Electronic/FODWEB website maintained by OCE PSEAD
Basic Curriculum: Professional Development Plan for PWS Investigators	TCEQ field operations training requirements for entry level staff	Electronic/FODWEB website maintained by OCE PSEAD
Senior Curriculum: Professional Development Plan for PWS Investigators	TCEQ field operations training requirements for senior level staff	Electronic/FODWEB website maintained by OCE PSEAD
Field Investigator Professional Development Plans	Record of training for all field investigators that conduct CCIs	Hard copy tracking of training maintained by OCE PSEAD
Investigative Checklists	TCEQ webpage that provides criteria used by TCEQ investigators for PWS to prepare for CCIs.	Electronic/ ☐https://www.tceq.texas.gov/compliance/investigation/checklists/waterchecklists
Customer Satisfaction Survey (CSS)	Interactive website to allow customers to comment on TCEQ's customer service to promote continued improvement	Electronic https://www.tceq.texas.gov/customersurvey
RG 344: TCEQ has Inspected Your Business. What does this Mean to You?	TCEQ regulatory guidance that summarizes enforcement processes, basic rights, and responsibilities	Electronic https://www.tceq.texas.gov/downloads/publications/rg/the-tceq-has-inspected-your-business-rg-344.pdf/@@download/file/rg-344.pdf
RG 456: I received a Field Citation. What happens next?	TCEQ regulatory guidance that explains processes to regulated entities when field citations are issued.	Electronic https://www.tceq.texas.gov/downloads/compliance/publications/rg/rg-456.pdf
Field Operations Division Public Water Supply Report Writing Protocol	TCEQ regulatory guidance that explains the process in writing accurate, completed and detailed investigative reports	Electronic FODWEB website maintained by OCE PSEAD
CCI reports and letters	CCI letters and reports summarize the results of CCIs and include notifications of compliance or violations. OCE sends letter to the PWS. OCE sends a copy of the letter and hard copy report to the WSD Inventory Team if information is needed to update SDWIS.	Hardcopy reports and letters are stored in Central Records; digital copies are stored in Webcenter Content (WCC).
CCI data	CCI electronic results of investigations	Electronic data stored in CCEDS, SDWI WCC.

Document or Record	Purpose	Format/Location
CCI Checklists and Field Notes	Documentations of items reviewed during a CCI	Hard copy and electronic records retained by investigators
Field Operation Standard Operating Procedure (FOSOP) Investigation Guidance	TCEQ standard operation procedures for pre-investigations, investigations and post investigations	Electronic/FODWEB website maintained by OCE PSEAD
SOP for Hach Pocket Colorimeter ™II Monochloramine + Ammonia	TCEQ regulatory guidance manual when collecting chlorine residual data for regulatory and environmental monitoring purposes	Electronic/FODWEB website maintained by OCE PSEAD
SOP for Potable Water Pressure Gauge	TCEQ regulatory guidance manual for using a pressure gauge to measure water pressures between 0-100 pounds per square inch	Electronic/FODWEB website maintained by OCE PSEAD
SOP for Hach DR/820 Pocket Colorimeter	TCEQ regulatory guidance manual when collecting chlorine residual and iron concentration data for regulatory and environmental monitoring purposes	Electronic/FODWEB website maintained by OCE PSEAD
SOP for DICKSON PR (125 AND 150) PRESSURE DATA LOGGER	TCEQ regulatory guidance manual for logging pressure data	Electronic/FODWEB website maintained by OCE PSEAD
SOP for Hach Color Test Kit Model CO-1	TCEQ regulatory guidance manual for collecting chlorine residual data for regulatory and environmental purposes	Electronic/FODWEB website maintained by OCE PSEAD
SOP for Hach Model 2100 Portable Turbidimeter	TCEQ regulatory guidance manual for collecting turbidity data for regulatory and environmental purposes	Electronic/FODWEB website maintained by OCE PSEAD

Group B: Implementing Environmental Information Operations

B1 Identification of Project Environmental Information Operations

Tests conducted by the PWS field investigators during a CCI (i.e., chlorine residual and pressure measurements) are performed to ensure adequate disinfection and check the PWS operators' ability to perform the tests correctly, see Section B4.

The tests can be performed side-by-side with the PWS operator in situ and do not involve planned sampling processes.

B2 Methods for Environmental Information Acquisition

Field investigators conduct chlorine and pressure measurements according to the SOPs listed in Table 3. SOPs are used by investigators in tandem with the manufacturer's

instruction manual for the equipment used by the individual regions.

During CCIs performed at surface water treatment plants, field investigators confirm PWS operators are utilizing appropriate analytical methods through review and confirmation of TCEQ Laboratory Approval documentation.

B3 Integrity of Environmental Information

Procedures for environmental information operations, including monitoring documentation and sampling requirements, are described within the TCEQ PWS Investigator's Manual and the DWSG. Requirements for PWS monitoring records that may be reviewed during CCI are described in the appliable PWSSP addenda.

B4 Quality Control

CCI project staff ensure adherence to the quality control objectives for CCIs by implementing a combination of management oversight, peer and management review of letters and reports, staff training, experience and coordination with other staff, standardized review processes pursuant to the SDWA, use of CCI checklists, and strict adherence to schedules and allotted timeframes.

The quality control (QC) checks described in this section involve the checks that field investigators perform during a CCI to ensure a PWS operator's performance of chlorine and pressure measurements are performed correctly.

During the CCI, field investigators review calibration and verification records and may do side by side comparisons to determine if PWS operators calibrate disinfection equipment (including both bench top and continuous testing equipment) according to 30 TAC §290.46(s)(2)(C) so that minimum chlorine residuals in each finished water storage tank and throughout the distribution system are always measured and maintained appropriately.

For example, PWS operators must ensure the accuracy of manual disinfectant residual analyzers are verified at least once every 90 days using chlorine solutions of known concentrations. In addition, free chlorine or chloramine residual (measured as total chlorine) must be measured to a minimum accuracy of plus or minus 0.1 milligrams per liter.

Color comparators can be used for distribution system samples only. When used, a color comparator must have current reagents, and an un-faded and clear-color comparator, and a sample cell that is not discolored or stained, and must be properly stored in a cool, dark location where it is not subjected to conditions that would result in staining. The color comparator must be used in the correct range. If a sample reads at the top of the range, the sample must be diluted with chlorine-free water, a reading taken, and the resulting residual calculated.

Field investigators verify these requirements by reviewing calibration/verification records as well as performing side-by-side testing with the PWS operator. PWS operators QC their own chlorine testing equipment in accordance with manufacturer instructions.

B5 Instrument/Equipment Calibration, Testing, Inspection and Maintenance

B5.1 Equipment Testing, Inspection, and Maintenance

Field investigators are responsible for cleaning and maintaining agency equipment used to conduct CCIs. Equipment testing, inspection, and maintenance is conducted in accordance with manufacturer recommendations and SOPs described in Table 3.

B5.2 Equipment Calibration and Frequency

Field investigators calibrate equipment according to the analytical SOPs listed in Table 3.

B6 Inspection/Acceptance of Supplies and Services

Supplies and consumables used by field investigators are controlled to ensure that analysis results are reliable and consistent. All supplies comply with the criteria and standards designated in the TCEQ PWS Investigator's Manual, Standard Methods for the Examination of Water and Wastewater, the Drinking Water Sampling Guide (DWSG), and applicable EPA Drinking Water Methods or state/federal regulations, as applicable.

B7 Environmental Information Management

After a CCI is conducted, the field investigator enters the investigation data/information into CCEDS in accordance with the CCEDS Online User Guide.

Field investigators incorporate investigation data/information into complete CCI reports for every inspection of a PWS. Once the field investigator completes the draft CCI report and drafts the required letter(s), the investigator assembles the investigation package and submits it to the appropriate Regional staff member for the "Quality Review" procedure, if required.

OCE management review the investigation packages to ensure completeness and accuracy. Once the investigation package meets the quality review requirements, it is signed, approved, copied, and distributed. Reports are routed to CFR and uploaded to WCC. Region updates SDWIS inventory data; any changes to administrative contacts, new sources, or treatment are routed to WSD for data entry.

Group C: Assessment, Response Actions and Oversight

C1 Assessments and Response Actions

Assessments and oversight associated with CCIs are discussed in Section C1 of the Programmatic QAPP. Types of TCEQ audits and oversight applicable to this Addendum include the following activities.

- Project oversight
- Peer review and coordination
- Laboratory accreditation audits

C1.1 Corrective Action (CA)

Descriptions of PWSS Program assessments and corrective action procedures are provided in Section C of the Programmatic QAPP.

C2 Oversight and Report to Management

Descriptions of how PWSSP management and the EPA are kept informed of project oversight and assessment are provided in Section C of the Programmatic QAPP.

Group D: Environmental Information Review and Usability Determination

D1 Environmental Information Review

D1.1 Data Review, Verification, and Validation Requirements

This section defines the review processes to ensure CCI work products, including environmental data and information, are of known and defensible quality consistent with program objectives specified in Section A6. The review of data and information involves verification as defined below.

Verification: Evaluating the completeness, correctness, and conformance/compliance of specific data/information against method and procedural requirements described or referenced in this QAPP Addendum.

Validation: A sample and analyte-specific process that extends the evaluation of data and information beyond method and procedural compliance (i.e., data verification) to determine the quality of specific data sets.

D1.2 Verification and Validation Methods

The post investigative/review phase of the CCI involves the activities conducted by OCE field investigators to verify data, letters, and reports before they are completed. These include, but are not limited to:

- Access Secretary of State, Appraisal District, Central Registry, Westlaw to ensure correct information (as needed)
- Send core data forms, updated forms to Central Office for changes (as needed)
- Update CCEDS report with resolved or active violations, if applicable
- Update the PWS Database of Record (SDWIS) with updated information
- Review the CCI report
- Turn complete report in for peer review

- Turn report in to Water Section Manager for review
- Report discrepancies for sampling sites to the WSD
- Send Report to the inventory group within WSD

The inventory group compares data in reports against SDWIS (e.g., ownership, contact information, source facility, population, connections, and capacity) and updates SDWIS as necessary.

D2 Useability Determination

The final work products of CCIs involve data, letters, and reports which are finalized when the post-investigative/ review and verification steps described in Section D1 are implemented. If a CCI results in a field citation the PWS has options available to them which are addressed in TCEQ RG-456, *I Received a Field Citation, What Happens Next?* One option involves declining the violation if the PWS disagrees with the violation(s) and entering into discussions that may resolve or settle the enforcement matter or lead to litigation for resolution.