



WWTF Workgroup

May 6, 2010 9:30 AM

Workgroup Members Present: Ray Mayo (City of La Porte), Leonard Levine (GCWDA), Eloy Mendoza Jr. (CLCWA), Kim Laird (TCEQ), Sarah Metzger (City of Pasadena), Lisa Miller-Marshall (GBF)

Discussion: Leonard Levine reviewed the possible management measures that the workgroup came up with during the last meeting. As the measures were discussed, five new measures were added to the list (in bold at the end) and one was taken off. "Review the frequency of watershed data" was removed from the list because it was not clear of the intent. Regionalization and collection systems were also discussed.

Possible management measures:

1. Confirm that existing facilities are meeting the discharge permit limit.
2. TMDL recommends setting the limit at the water quality standard.
3. Increase the monitoring frequency, especially for the smaller facilities.
4. Establish training and better guidance for permittees with new bacterial monitoring requirements, particularly in the areas of sampling techniques and disinfection equipment and preventative maintenance programs.
5. Prioritize the facilities that are coming up for renewal and provide pre-permitting support to help them prepare for the process.
6. Offer assistance to small facilities that have discharge violations to help them get back on track.
7. Set up compliance agreements for the facilities that are preparing for the permit renewal. Offer funding for pre-testing early enough that the facilities can get into compliance before the new permit limits take effect.
8. Encourage discharges to sample and test for bacteria before actual permit renewal to ensure the facility is in compliance and testing for the correct species.
9. Funding for more frequent unannounced TMDL sampling. Information would be fed back to the TMDL team to be used in the evaluation of the implementation plan.
10. Require higher minimum of a C License for operators of facilities impacted by the TMDL. Offer funding for the extra training if it is necessary.
11. Offer classes covering bacteria issues closer to the entities and make sure the class is relevant.
12. Find and apply for a grant to have TEEX give two classes a year to the operators to keep their knowledge and practices current in terms of bacterial compliance issues.
- 13. As part of the permit renewal or issuance, TCEQ would provide a detailed guidance document to help the facilities comply with the new bacterial sampling.**

14. After a specified number of bacteria violations, the facility will be required to seek assistance to reach compliance. It would be up to the facility to decide the type of assistance to pursue. Options might be to ask for help from TCEQ, neighboring cities, a qualified engineer, or from the recommended peer group (a list of qualified professionals chosen by the workgroup.)
15. Require training for bacterial sampling and operations and maintenance if the facility is in a TMDL.
16. Require redundancy in the chlorine feed system and auto switch over capabilities. Include this training in basic operator training class curriculum. Offer training classes in the TMDL area on a regular basis.
17. Require redundancy in the chlorine feed system and auto switch over capabilities.

Regionalization was discussed as a possible management measure. The group will look at the BIG language for regionalization but in general would like to encourage facilities to consider it.

Collection Systems: Encourage the facilities to participate in the Sanitary Sewer Overflow Initiative (SSOI). Monitor and collect data to figure out if this is a major problem and source of bacteria in the Bay. When the TMDL comes up for review, if the data indicates that collection systems are a problem, then participation in the SSOI would be required.

Action Items:

1. Lisa will look at how the BIG is addressing the regionalization issue; look at the language the BIG is using in their plan.
2. Kim will check to see if all of the facilities within this TMDL are testing for fecal yet.
3. Lisa will look at the BIG language for SSOs.
4. Sam will check the DMR for the Pasadena facilities.
5. Lisa will forward the violations and DMR out to everyone in the group.
6. Lisa will begin putting these ideas into the matrix so that we can begin to prioritize the management ideas during the next meeting.
7. Lisa will email the revised WWTF map to the workgroup members.

Next meeting: June 3, 2010 at 9:30 AM