



WWTF Workgroup

June 3, 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), Linda Broach (TCEQ), Scott Jones (GBF), Lisa Miller-Marshall (GBF)

Public Meetings

Three public meetings will be held in July to update the TMDL stakeholders on the progress of the workgroups. The list of management measures from each workgroup will be discussed as well as the timeline for the next year. Members were asked to notify people about the meetings. The schedule for the meetings is:

July 20, 2010 at Flower Garden (NOAA) in Galveston at 7:00 pm

July 21, 2010 at American Legion Hall in Anahuac at 7:00 pm

July 22, 2010 at Clear Lake Park Meeting Room in Seabrook at 7:00 pm

Discussion: The suggested management measures were reviewed and discussed in order to refine and prioritize each measure. Some minor changes and additions (in bold) were made to the list. The list of management measures were then divided into four broad categories that will eventually be refined to develop management measures with sub-measures.

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. Offer funding for pre-testing early enough that the facilities can get into compliance before the new permit limits take effect.

8. Encourage dischargers 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 sampling of bacteria in discharges to the TMDL area.
10. Require 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 TEEEX 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. Recommend that an alternate group establish a better communication mechanism for more prompt response (or feedback) to complaints or irregular samples.**
- 18. More unannounced focused inspections to address potential bacterial issues.**
- 19. More unannounced inspections in general.**

Regionalization - Encourage WWTF regionalization.

Collection Systems: Recommend the facilities participate in the Sanitary Sewer Overflow Initiative (SSOI) at the time they renew their permit. Pursue funding for evaluations to get entities into the SSOI.

Measures Divided by Category: See Attached

Action Items:

1. Lisa will put the management measures into categories and email to the workgroup.

Next meeting: July 1, 2010 at 9:30 AM

Categorized Measures

Set Standards:

2. TMDL recommends setting the limit at the water quality standard.

Give WWTFs the tools to meet the standards:

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.
6. Offer assistance to small facilities that have discharge violations to help them get back on track.
7. Offer funding for pre-testing early enough that the facilities can get into compliance before the new permit limits take effect.
8. Encourage dischargers to sample and test for bacteria before actual permit renewal to ensure the facility is in compliance and testing for the correct species.
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.
17. **Recommend that an alternate group establish a better communication mechanism for more prompt response (or feedback) to complaints or irregular samples.**

Standards Upgrades – Operating and Maintenance Standards Upgrades:

16. Require minimum of a C License for operators of facilities impacted by the TMDL. Offer funding for the extra training if it is necessary.
18. 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.

Agency Action Improvements:

1. Confirm that existing facilities are meeting the discharge permit limit.
3. Increase the monitoring frequency, especially for the smaller facilities.
5. Prioritize the facilities that are coming up for renewal and provide pre-permitting support to help them prepare for the process.
9. Funding for more frequent unannounced sampling of bacteria in discharges to the TMDL area.
- 18. More unannounced focused inspections to address potential bacterial issues.**
- 19. More unannounced inspections in general.**

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