



SANITARY SEWER SYSTEM SOURCES WORK GROUP MEETING

Meeting Notes
May 12, 2009

- **Individuals Present**

Jason Iken (City of Houston), Jennifer Elms (EHRA), Alisa Max (HC), Steven Johnston (GBEP)

- **H-GAC Staff Present**

Erin Livingston, Rachel Powers, Ayo Jibowu

- **Call to Order/Welcome/Introductions**

Rachel welcomed attendees, initiated self-introductions, and reviewed the agenda.

- **Discussion**

Mapping

A small percentage of our region is under an SSO initiative, H-GAC is working on the GIS map.

Are collection system areas mapped? Harris County has done this. Harris County Precinct 2 also has maps of collection areas overlaid with developed areas.

A Certificate of Convenience and Necessity (CCN) defines the service area, water CCN and sanitary CCN. Part of the document is a legal description, which sometimes includes a map. These maps can be found on the TCEQ website, but they are not great.

The City of Houston knows of all their subscriber systems, but they might not be mapped. The City's systems are in GIMS. (H-GAC has the GIMS)

Boundaries of MUDs might indicate collection system areas. H-GAC obtained MUD boundary info from TCEQ, but they are not great. H-GAC has tried to clean up the data.

SSOs

TCEQ has SSO data in an access database but only 20% of communities are reporting.

Do we really need to know where overflows have historically occurred? They are supposed to fix them when they find them. System operators would know where they are more likely to occur.



On the other hand it would be good to know about constructed overflows: when raw wastewater can purposefully overflow into a storm sewer. This number will be very small. The other overflows are mostly due to pipes clogging.

TCEQ offers the SSO initiative to systems they have inspected and found to have problems *and* when permitting notes I/I issues. To make this initiative mandatory TCEQ would need more employees.

The fact that the SSO initiative is voluntary is what the municipalities like. It is good for public relations. Maybe we could make some parts mandatory and others voluntary.

Put in the permit that you are only allowed 4Q flow from I/I. This is already in the design standards. (4Q = 4 times annual avg. flow) Might have to be something other than 4Q though.

Kim can get a list of those in the official SSO initiative and the list.

Subscriber systems

Subscriber systems are not permitted at all. All other collection systems are permitted through the WWTF permit. Nationwide, 20% are subscriber systems, but we don't know if this is accurate for this area. If we promote/pursue regionalization we will have more subscriber systems. It would be easier to have a general permit for subscriber systems rather than individual permits. Subscriber systems can be enforced without a permit, but they don't get routinely inspected.

How do you regulate SSOs without creating a permit? Regulate through the WWTF permit.

CMOM

CMOM works, but it needs to be a proactive approach. Communities need to control it themselves.

We should promote it as a way to meet requirements of the Stormwater permit and WWTF permit. Bring it to them as a solution to the problem. (Dallas has a higher participation rate)

To get CMOM in a permit would require rulemaking. TCEQ might not do it without rulemaking. Implementation activities in a TMDL can cause permits to be opened and revised.

It would be easiest to require everyone to have a CMOM, but it won't work for MUDs because they don't have the staff.

The construction regulations were approved because those that would be affected were involved. We need to do this with CMOM. AWDB, Operators, GHBA, Texas Public Works Association, HCEC, communities that voluntarily do CMOMs, Southwest Water, Severn Trent and other groups need to be here for this conversation.

Require an end but don't specify the means. Determine which parts of CMOM reduce bacteria.

Incentivize CMOM: smaller fines, grants for implementation, reduced inspections

TCEQ - 12 inspectors, 1100 systems, some facilities are inspected every five years, others every two years

- **Wrap-up**

Next meeting date: Monday, July 20, 2009, 9:30 am to 11:30 am, H-GAC Conference Room B

Tasks:

Alisa will give Harris County GIS contact info to Ayo.

H-GAC to research where CMOMs have been mandated.

DRAFT