

**Bacteria Implementation Group
Meeting Summary**

Tuesday, November 18, 2008

Members Present:

Michael Bloom	Tom Ivy	Linda Pechacek
John Blount	Ron Kelling	Ceil Price
Pat Buzbee	James Tynan Kelly	Kathy Richolson
Marilyn Christian	Helen Lane (by phone)	Jim Robertson
Robert W. Collins	Craig Maske	Brian Shmaefsky
Carol Ellinger	Michael Mooney	Robert Stokes
Catherine Elliott	Mitchell Page	
Joe Ferro	Raymond Pavlovich	

Jason Iken was represented by Richard Chapin.

Jack Murphy was represented by Susie Cavazos.

Becky Olive was represented by Nancy Sullins.

Linda Shead was represented by Carolyn White.

Members Absent:

Mike Garver	Teague Harris	Jim Meley
Melvin Solomon		

Guests Present:

Stephen Archer (Archer Environmental), Steve Barry (Jones & Carter), Amy Branom (TCEQ), Linda Broach (TCEQ), Kimberly Coleman (SWWC), Catarina Cron (Harris County Judge), Jennifer Davis (Parsons), Winston Denton (TPWD-Dickinson), Helen Drummond (GBEP), Ingrid Fairchild (HCFCD), Brian Koch (TSSWCB), Mark Lowry (AECOM), Charles Maguire (TCEQ), Ed Matuszak (URS Corporation), Alisa Max (Harris County Watershed Protection Group), Sarah Metzger (City of Pasadena), Maria Modelska (University of Houston), Chip Morris (TCEQ), Joe Myers (HCFCD), Kerry Niemann (TCEQ), Snehal Patel (HCAO), Allen Peach (URS), Tina Petersen (CDM, Inc.), Mary Purzer (AECOM), Nic Ramirez (AEI Engineering), Nick Russo (Harris County), Scott Saenger (Jones & Carter, Inc.), Robert E. Snoza (HCFCD), Ron Stein (TCEQ), Barbara Sullivan (TCEQ), Michael Thornhill (Southwest Water Company), Ashley K. Wadick (TCEQ)

H-GAC Staff Present:

Jeff Taebel, Carl Masterson, Rachel Powers, Erin Anderson

1. Welcome & Introductions

Rachel Powers welcomed everyone and then thanked everyone for coming. She initiated self-introductions of BIG members, H-GAC staff, and TCEQ staff.

Rachel then reviewed the agenda.

2. Certification of Quorum

Twenty-six members were present, forming a quorum.

3. Approval of October 28, 2008, Meeting Summary

Meeting notes were approved with the following changes:

- Nancy Sullins was representing Becky Olive.
- Tom Ivy was at the meeting not Jim Williams.

4. Approval of Proposed Alternates

In addition to the list of alternates provided in the handout, the following nomination was approved as an alternate:

- Richard Chapin for Jason Iken.

5. Workgroups

Workgroup summaries were verbally provided to the BIG by either the BIG liaison from the workgroup or H-GAC staff if no BIG member had been present at the workgroup meeting. The source workgroups reported that potential sources of bacteria and **implementation activities (IAs)** were discussed at each meeting. Some additional items that developed during the source workgroup meetings were as follows:

- Construction and Land Development decided to meet concurrently, but will still produce two sets of recommendations.
- At the Land Development meeting no actual representatives from the land development community were present. The group discussed outreach to get individuals from this community involved.
- Again at the Land Development meeting the question of whether or not nutrients should be addressed in the IAs was brought up. The group felt that nutrients should be looked at. The BIG concurred and it was decided that all source workgroups should consider nutrients as they apply to each source. TCEQ reported that they are looking at nutrient criteria for the future.
- The Stormwater workgroup, in addition to discussing sources and IAs, created a list of stormwater facilities so that IAs could be directed at the appropriate portions of the stormwater system.
- The Animal workgroup identified transient populations as a potential source of bacteria, but did not know in which group this source should be considered. It was discussed during the BIG meeting and potential workgroups mentioned included: Residential, Stormwater, Illicit Discharges and Dumping (IDD), and Animals (but with a new name for the workgroup). After some consideration it

was determined that transient populations and any instance of public defecation would be included in the IDD workgroup.

The two non-source related workgroups that met prior to the BIG meeting focused their discussions as follows:

- Watershed Outreach focused their discussion on the development of criteria to prioritize segments geographically for IAs.
- Coordination & Policy developed a recommendation for consideration by the BIG: to have a workgroups liaison meeting composed of a few representatives from each workgroup prior to the January BIG meeting. The objective would be to focus the vision on criteria and activities identified to date. The purpose for the meeting is to help avoid duplication and conflict. No objections were expressed by the BIG and so the meeting will proceed. Each workgroup should discuss prioritization criteria.

Three workgroups--Research, Monitoring and IDD-- had not yet met at the time of the BIG meeting.

6. Report Contents and Structure

Rachel provided an overview of the method used for developing the I-Plan outline. H-GAC staff included items obtained from the EPA that need to be included in the I-Plan. Staff additionally reviewed bacteria Implementation Plans from across the country and other implementation plans not specific to bacteria from within Texas and included appropriate elements from these documents into the outline.

EPA's items to include

- Reasonable assurances that load allocations will be achieved using incentive based non-regulatory or regulatory approaches.
- Public participation process.
- Recognition of other watershed management processes and programs such as local source water protection and urban stormwater management programs as well as the States Section 303(e) continuing planning process.
- The nine elements of a Watershed Protection Plan as these are required to get 319 funding.

A general overview of the document format was then reviewed. Some of the information would be pulled from the TMDL documents, but that the substance of the document would be in the section describing the IAs. Activities would be arranged by source, watershed/segment, and community/stakeholder group. Discussion followed. Several people recommended that information regarding the IAs be sliced only one way in the document and that slicing the IAs in additional ways would be more appropriate in supplemental material or in a web application. When creating the document, we must remember that there will be some IAs that will be implemented through permits and some that will be voluntary for a community. TCEQ staff advised that, while there

will have to be a formal enough document produced so that the bureaucracy can acknowledge and adopt it (a paper document), the group should endeavor to create a product with great communication value, instructive value, and inspirational value.

The idea was introduced that maybe the Coordination and Policy workgroup should work on the outline. Input was given that this group could come up with a list of things to possibly be added, but that the BIG members should ultimately decide on the outline. It was stated that perfecting the document outline is the most important part of the I-Plan process.

Q: Should the EPA be involved in the I-Plan creation process, and if so what degree of involvement is appropriate?

This question produced much discussion. Most felt that the EPA should be involved in some way, but the perceived optimum level of involvement varied.

Reasons for involving the EPA included the fact that, although the EPA does not have to officially approve the I-Plan, as this is done by the TCEQ, the EPA will ultimately need to approve some elements of the I-Plan. One view was that some of the IAs that will be proposed will likely need to be implemented through permits and the EPA has approval powers over some permits. Additionally, some of the IAs will likely become part of TCEQ's Water Quality Management Plan which has to be approved by the EPA. There is some precedence that, although the nine required elements for a Watershed Protection Plan will be included, the EPA will require additional information if funding is to be obtained.

Some cautioned the group on too much EPA involvement and that the development of the I-Plan shouldn't be an EPA driven process. It was stated that the group has the EPA's checklist of items to include and that if something needs to be added later on it can be done. It is still very early in the process and it is not likely that the EPA would give any sort of approval at this time. Additionally, someone from the Region 6 office would not really be speaking for those in Washington, D.C.

Middle of the road comments included the statement that there is a difference between asking for EPA input and asking for EPA approval. Asking for input would not be bad at this point. The question could be phrased to the EPA as follows, "is there anything you can't live with?" Additionally it was stated that asking the EPA to answer specific questions seemed reasonable.

One name that was mentioned as someone from the EPA to possibly invite was Claudia Hosch, as she is in charge of permit conditions and TMDLs at Region 6. It was suggested that this topic should be revisited after there has been more development of the outline and document.

7. Other Business/Roundtable

- Some signatures are still needed on the Ground Rules document.
- The State of the Bay Symposium will be January 12-14, 2009, in Galveston
- Houston Metro TMDL meetings were recently held and went well. It was announced that if there are any groups interested in having a presentation on the TMDL projects H-GAC will be happy to coordinate.
- The National Research Council has published a new book Urban Stormwater Management in the United States. It provides a detailed discussion of what does and doesn't work in regards to the management of urban stormwater. It additionally makes suggestions to the EPA on changes that should be made to the stormwater permitting program. There is currently a link for a free download under EPA publications.
- On December 16, 2008, PBS will be broadcasting a documentary called "Liquid Assets." The program will cover water, wastewater, and stormwater infrastructure and the needs nationwide. The goal of the program is to increase investment in the infrastructure systems.

8. Next Meeting Date

The next regularly scheduled meeting will be on January 20, 2008. The primary items for discussion will be reviewing the outline for the Implementation Plan document and Workgroup summaries.

The December meeting was been canceled to allow the workgroups to further their progress which will assist the BIG members in understanding the format of and information to be included in the Implementation Plan document.

9. Adjourn

The meeting was adjourned at 3:23 PM.

BACTERIA IMPLEMENTATION GROUP

Roster

Name	Representing	Affiliation	Alternate 1	Alternate 2
Michael Bloom	Ag/Business	PBS&J, Greater Houston Partnership	Jason Maldonado	
John Blount	County	Harris County Planning & Operations Division	Alisa Max	
Pat Buzbee	County	Montgomery County Environmental Health	Phil Moore	
Marilyn Christian	County	Harris County Public Health & Environmental Svcs.	Snehal Patel	
Robert W. Collins	County	Montgomery County		
Carol Ellinger	Municipal	City of Houston	Sarah Metzger	Richard Chapin
Catherine Elliott	County	Harris County Flood Control District	Joe Myers	Carolyn White
Joe Ferro	Municipal	City of Webster		
Mike Garver	Buffalo/Whiteoak TMDL	Buffalo Bayou Partnership	Scott Barnes	
Teague Harris	Municipal	Pate Engineers, Inc.		
Jason Iken	Metro TMDL	City of Houston	Alex Van Keuren	
Tom Ivy	Public	Texas Stream Team	Jim Williams	
Ron Kelling	Ag/Business	San Jacinto River Authority		
James Tynan Kelly	Conservation	Bayou Preservation Association	Bruce Heiberg	Mary Ellen Whitworth
Helen Lane	Conservation	Houston Audubon	Gina Donovan	
Craig Maske	Metro TMDL	Dodson & Associates, Inc./HCEC	Scott Saenger	
Jim Meley	Ag/Business	Harris County Soil & Water Conservation Dist. #442	Cathy McCoy	
Michael Mooney	Lake Houston TMDL	The Woodlands Joint Powers Agency		
Jack Murphy	Municipal	City of League City	Susie Cavazos	Brian Craig
Becky Olive	Ag/Business	TCB	Nancy Sullins	Tony Bennett
Mitchell G. Page	Lake Houston TMDL	Schwartz, Page & Harding, LLP	Michael Page	
Raymond Pavlovich	Wildcard	Nottingham Country Municipal Utility District	Michael Thornhill	Mark Stendahl
Linda Pechacek	Public	Citizen, Civil Engineer	*Fred Lazare	
Ceil Price	Buffalo/Whiteoak TMDL	City of Houston	Michael Schaffer	Guyneth Williams
Kathy Richolson	Clear Creek TMDL	Gulf Coast Waste Disposal Authority	Phyllis Frank	
Jim Robertson	Conservation	Cypress Creek Flood Control Coalition	Richard "Dick" Smith	
Linda Shead	Conservation	The Trust for Public Land	Mary Ellen Whitworth	Carolyn White
Brian Shmaefsky	Public	Lone Star College, Kingwood	Dr. John Connolly	
Melvin Solomon	Municipal	City of Conroe	Ron Green	
Robert Stokes	Clear Creek TMDL	Galveston Bay Foundation	Vanessa Mintzer	

*not yet approved

Nine Key Elements of a Watershed Protection Plan

1. An identification of the **causes and sources** or groups of similar sources that will need to be controlled to achieve the load reductions estimated in the watershed plan. Sources that need to be controlled will be identified at the significant subcategory level with estimates of the extent to which they are present in the watershed.
2. An **estimate of the load reductions expected for the management measures** recognizing the natural variability and the difficulty in precisely predicting the performance of management measures over time. Estimates will be provided at the same level as the causes and sources.
3. A description of the **management measures** that will need to be implemented to achieve estimated load reductions, and an identification of the critical areas in which those measures will be needed to implement the plan.
4. An estimate of the amounts of technical and financial **assistance needed**, associated **costs**, and/or the **sources and authorities** that will be relied upon, to implement the plan.
5. An **information/education** component that will be used to enhance public understanding of the project and encourage their early and continued participation in selecting, designing, and implementing the management measures that will be implemented.
6. A **schedule** for implementing management measures identified in the plan that is reasonably expeditious.
7. A description of **interim, measurable milestones** for determining whether management measures or other control actions are being implemented.
8. A **set of criteria that can be used to determine whether loading reductions are being achieved** over time and substantial progress is being made towards attaining water quality standards and, if not, the criteria for determining whether the plan needs to be revised.
9. A **monitoring component** to evaluate the effectiveness of the implementation efforts over time, measured against the criteria established in item (8) immediately above.

The information above was obtained from the Texas A&M AgriLife website at:
<http://watershedplanning.tamu.edu/docs/workplan.pdf>

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources		Implementation Activities and Targeted Critical Areas
Agriculture	Fertilizer		Nutrient Management Plan Create stakeholder groups to consider regulation of use
Agriculture	Poor composting practices		Residue Management Nutrient Management Plan
Agriculture	Mulch	Creation	
Agriculture		Application	Residue Management
Agriculture	Disturbed soil		Erosion Prevention
Agriculture			Tillage Requirements (no-till)
Agriculture			Incentive based programs
Agriculture	Lack of prescribed burns/controlled burns		Residue Management
Agriculture	General		Drop pipes
Agriculture			Grade Stabilization Structures
Agriculture			Erosion Prevention
Agriculture			riparian areas
Agriculture			buffer zones
Agriculture			education, such as flyers at feed stores
Agriculture			Involve parties that are not yet involved
Animals	Migratory birds/wading birds/waterfowl		Create alternative wetland areas Evaporate water as part of crop rotation
Animals	Birds/bats roosting under bridges		move bats; create habitat away from streams and bridges, over grass
Animals	Feral animals	hogs	Reduce numbers
Animals			Set up more programs where hog meat is sold/given away
Animals		dogs/cats	Working to sterilize hogs
Animals			Spay/neuter programs
Animals	Large mammals (deer)		
Animals	Small mammals		
Animals	Livestock show/show animals	Washing down animals in parking lot	More people cleaning up parking lot
Animals		Bedding material (clean-out/storage, fresh material too)	Better containment/better dumpsters (cover roll-off bins)
Animals			More people cleaning up parking lot
Animals		Horse trail riders	
Animals	Livestock not at show	Grazing animals (cattle,horses,goats, sheep)	Cross fencing
Animals			Alternative sources of water and shade
Animals			Proper waste management
Animals			Target those not participating in existing incentive programs
Animals			Minimum grass height
Animals			Livestock pipeline
Animals		Pigs	
Animals		Rabbits	
Animals		Chickens	Education
Animals	Entertainment animals (e.g. parades)		
Animals	Aquaculture/associated birds		Rice farm BMPs

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources	Implementation Activities and Targeted Critical Areas
Animals	Stock ponds	
Animals	Small carnival/circus	
Animals	Petting zoo	
Animals	Turtles	
Animals	Vultures	
Animals	Dog parks	
Animals	Unregulated animal shelters	Get regulatory authority over them
Animals		Education is the only possibility if not regulated
Animals	Ornamental Ponds	
Animals	Dead animals	
Animals	Exotic animals	
Animals	Grackles, starlings, pigeons	
Animals	General	Quantify contributions of various animal populations
Construction	Soil	Soil control
Construction		Silt fence
Construction	Humans (Port-o-potties and direct deposits to the ground)	Make sure they are managed properly
Construction		More inspections
Construction	Nutrients used in soil stabilizers	Ban certain products
Construction		Regulate application rates and timing
Construction	Mulch	Recommend the use of other types of berms, alternatives are cheaper
Construction		Define acceptable types
Construction	Runoff	Mulch used sometimes
Construction		Vegetative buffer: incentivize their use
Construction		Revegetate the buffer as soon as the grading is complete
Construction		Build the detention pond and vegetate it first
Construction	Site dewatering/pumped water	Dewatering bag
Construction	Vehicle tracking	Rock on driveway
Construction		Truck wash downs
Construction	Violations of permits	Enforce existing regulations from TXR 15
Construction	General	TCEQ needs to do more inspections
Construction		Apply the CGP to sites smaller than one acre
Construction		Strengthen and make modifications to the CGP
Construction		Phase II plans can be modified annually. Recommend that certain bacteria levels should force parts of the plan to accelerate.
Construction		EPA is working to propose effluent limitation guidelines for stormwater from a construction site. Eventually could be in the CGP.
Land Develop	Garbage dumpsters	
Land Develop	Grease traps	
Land Develop		Use of and adherence to SWPPPs

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources		Implementation Activities and Targeted Critical Areas	
Land Develop	Prior land use	Animals	Soil control such as silt fences and vegetative buffers	
Land Develop		Residential septic/drain fields	Properly remove and remediate	
Land Develop		General		Remediate
Land Develop				Do a study
Land Develop				Avoid existing, heavily used wildlife areas
Land Develop				Require bacteria sampling in a Phase II
Land Develop				Add bacteria loading component to Phase I
Land Develop		Soil		Minimize soil disturbance
Land Develop	Ponds with waterfowl			
Land Develop	Poor solid waste management	Storage		
Land Develop		Pick-up		
Land Develop	Pavement washing/building washing			
Land Develop	Fertilizer/lawn care		Long term management plan (like Bridgeland)	
Land Develop	Runoff		Use detention ponds	
Land Develop			Regulate berm siting and size	
Land Develop			Incentivize developers to include more open areas by changing TCEQs view of them. Currently the only see a very small portion around the detention pond as a BMP. They consider the open area around a pond as a recreational facility. How the area is viewed by TCEQ affects funding.	
IDD	Direct discharge to ground/channel	Toilets	Walking channels and mapping direct dischargers (HCFCD doing this - Outfield data program)	
IDD			Make repairs	
IDD		Homeless	Walk channels and map camps	
IDD			Port-o-potties conveniently located	
IDD			Housing, shelter	
IDD		Other people	Port-o-potties conveniently located	
IDD	Grease traps tied into stormwater system		FOG education	
IDD			Walking channels and mapping direct dischargers (HCFCD doing this - Outfield data program)	
IDD			Dry weather outfall monitoring (Harris County, doesn't seem effective)	
IDD	Unpermitted/permitted facilities' stormwater runoff		Proactive inspection program, make sure they have appropriate permits	
IDD			Add nutrient sampling requirement to permits	
IDD			Walk channels	
IDD	Improperly stored nutrients			
IDD	Turf farms/nurseries			

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources		Implementation Activities and Targeted Critical Areas
IDD	Dumping of waste		Provide convenient and cost effective method of collecting HHW to encourage proper disposal/permanent facility
IDD			Better control of waste haulers
IDD			Monitor trip tickets
IDD	Hauling of waste		Better control of waste haulers
IDD			Monitor trip tickets
IDD	Leaking dumpsters		
IDD	Cosmetic washing sources		
IDD	General		More inspections, perhaps by TCEQ, are needed
IDD			Penalties need to happen faster and be more certain
IDD			Judges need to be on board, understand the rules more so that they won't throw violations out
IDD			educational program or upgrade your system in lieu of paying a fine
IDD			Set up an environmental court
IDD			Give citations with associated fines, could choose to pay the fine or fight it in court
IDD			High enough fine to deter future violations, but low enough so that they will pay it
OSSF	General		<ul style="list-style-type: none"> -Spend money on existing programs -Educate owner/operators -Cluster systems -Create inventory for prioritization -Inspect existing facilities -BMPs for new permits -Underwrite installation, replacement, maintenance, connections -Require maintenance agreements -Create regional authority to address issue -Obtain additional authorities for counties and cities to maintain OSSFs -Create cluster systems in existing neighborhoods (would require creation of responsible party)
OSSF	Surface discharge and runoff		
OSSF	Lack of maintenance		Electronic monitoring of maintenance
OSSF		Increase in compliance inspections	
OSSF	System overloading		Find grant funds to repair failing systems or hook up to sanitary
OSSF		Increase in compliance inspections	

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources		Implementation Activities and Targeted Critical Areas
OSSF	Poor design and construction		
OSSF	Old systems before permitting		Inventory and strategize to replace or hook up to sanitary
OSSF	Pipes to the ditch		
OSSF	Transport of solids from OSSFs/illegal dumping		Better tracking of pick-ups and drop-offs
OSSF	Household behaviors (too many chemicals, too much water at once)		Education
OSSF	Inadequate disposal area		Have developers and government put in WWTF as appropriate (targeted areas, could be a package plant until larger plant constructed)
OSSF			Make treatment plants take on new customers if they have the capacity
OSSF			Inventory and strategize to replace or hook up to sanitary
OSSF	Inadequate treatment		Inventory and strategize to replace or hook up to sanitary
OSSF	Falsification of maintenance records		Electronic monitoring of maintenance
OSSF	Improper switch to sanitary system		
OSSF	Some property owners don't have the funds to maintain		Find grant funds to repair failing systems or hook up to sanitary
OSSF	Mobile home parks		Have developers and government put in WWTF as appropriate (targeted areas, could be a package plant until larger plant constructed)
Residential	Pet waste	dog	Education; laws outside of cities Enforcement; train enforcement officers Public Education through 4H, Feed Stores, etc.
Residential		cat	
Residential		rabbit	
Residential		horse	
Residential		pig	
Residential		chicken	

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources		Implementation Activities and Targeted Critical Areas
Residential		cattle	
Residential	Koi ponds/decorative ponds		Census & Study to quantify; education regarding cleaning
Residential	Fertilizers lead to growth		Plant native species/vegetation
Residential			"Yard-Wise" classes
Residential			Outlaw certain fertilizers (those with high phosphorus levels)
Residential			Provide education regarding overuse
Residential	Yard Waste & Grass clippings		Education Enforcement
Residential	Mulch		Education
Residential	Manure		Education
Residential	Compost		Promote master composting program
Residential	Poor maintenance of septic system		Water conservation; Refer to OSSF group for education regarding maintenance & pumping
Residential	Litter		Education & Enforcement
Residential	Overwatering		Promote xeriscaping
Residential			"Yard-Wise" classes
Residential			Support existing conservation programs
Residential			Raise water rates
Residential			Plant native species/vegetation
Residential			Commercial lawn care
Residential	FOG		Education
Residential			Recycling Program; drop-offs
Residential	General		Increase appreciation for the waterways
Residential			Expand Harris County's program to other communities with impaired waterways
Residential			GBEP has a great Public Participation and Education program
Residential			Pasadena has a WPG
SSS	Power outages at lift stations		Generators (requirements to have them for a certain % of lift stations) Increase required storage capacity require quick-connects Promote conservation after events Require dual feeds
SSS	Aging system	Infiltration and Inflow	Periodic televising of lines/inspection plan and cleaning
SSS			Require inspection of the collection system
SSS			-Voluntary: CEMOM (Capacity Management of Maintenance Systems) -Continue existing penalty programs
SSS		Exfiltration	Require inspection of the collection system
SSS			Periodic televising of lines/inspection plan and cleaning
SSS			Require quicker reporting

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources		Implementation Activities and Targeted Critical Areas
SSS		SSO	Require reporting to local authorities in addition to TCEQ and require them to be more accurate
SSS			TCEQ SSO initiative plan
SSS			Require inspection of the collection system
SSS			Swale condition in lines
SSS			Optimize screening based on past history where SSOs have been and focus efforts there
SSS	Illicit connections/illegal dumping		Walking channel/dry weather outfall identification
SSS			Screening of illicit connections (dry and wet weather)
SSS	Fats, oils, and grease	Restaurants	Proper grease trap sizing
SSS			Inspections of grease traps
SSS			Maintenance of grease traps
SSS			Look at FOG transport logs
SSS		Apartment complexes	-Public education of FOG -Apartment scale grease interceptors
SSS	Swale conditions in lines		Periodic televising of lines/inspection plan and cleaning
SSS	Slime growth in lines		
SSS	Lack of topographic relief		
SSS	Private laterals		Incentive program for private landowners to upgrade Identify and prioritize areas with high density of problem laterals
SSS	Improperly installed/maintained air relief		
SSS	Inadequate lift station capacity		Better lift station design/maintenance -Require lift stations wherever a line crosses a waterway
SSS	Subscriber systems do not adequately create incentives for appropriate level of maintenance		-Require subscriber systems to be permitted (perhaps a general permit) -
SSS	Permitted non-compliance		-Increase penalties so that it is less expensive to fix a problem instead of pay the penalty
SSS	New system design and construction requirements are not stringent enough		Improve specifications; increase resources for review and inspection
SSS	Lift stations in floodplain		Different regulations on placement
SSS	General		Meetings between TCEQ and permittees to explain what is expected
SSS			TCEQ show up at association meetings to educate
SSS			Accurate, up-to-date maps of the system
Stormwater	Detention Controls	Slime	

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources		Implementation Activities and Targeted Critical Areas
Stormwater	Storm sewers	Slime	
Stormwater	Streets	Vegetative litter	
Stormwater		Dead Animals	
Stormwater	Gutters		
Stormwater		Sediment	
Stormwater		Runoff	
Stormwater	Inlet	Vegetative litter	
Stormwater		Litter/trash/food scraps	
Stormwater	Detention Basin		
Stormwater	Private collections		
Stormwater		Ponding/standing water	
Stormwater	Riparian buffer	Animal direct deposits	
Stormwater	Reservoirs	Animal direct deposits	
Stormwater	Bar ditch	Animal direct deposits	
Stormwater	Channels	Animal direct deposits	
Stormwater		Natural soils/stream beds	
Stormwater	Roadside ditches	Dead Animals	
Stormwater		Vegetative litter	
Stormwater		Animal direct deposits	
Stormwater		Natural soils/stream beds	
Stormwater		Private ponds	
Stormwater		Re-growth	
Stormwater		Vegetation	
Stormwater	General		Submit a bracketed bill to the legislature for the counties involved in the regional TMDL to obtain regulatory powers over stormwater discharges. Counties should have the option to adopt the procedures or not.
WWTF	Treatment process/type of process		Tertiary treatment (Sand filters, tertiary clarifiers, treatment wetlands)
WWTF			Modify plants to meet higher design and operation standards
WWTF	Upsets		Regionalization?
WWTF	Problems from maintenance		Further education of the operators
WWTF	Effluent		Composite sampling; specify flow regimes for sampling requirements
WWTF			Through permit, require monitoring of all plants, including industrial and plants with less than 5 MGD
WWTF			Bacteria disinfection testing program
WWTF			Sampling requirements

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 Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources	Implementation Activities and Targeted Critical Areas
WWTF		Local permitting program with more stringent bacteria-specific requirements
WWTF		Stricter discharge limits, look at parameters for different waterways
WWTF		Greater enforcement
WWTF	Aerosol distribution	
WWTF	Sludge	
WWTF	Non-potable water irrigation	
WWTF	Weather events/power outages	Generator (requirements to have them come on automatically when needed, or a contract to have them readily available)
WWTF		Alternate power source
WWTF	Unauthorized discharges/ splashing over/leaking dumpsters	Greater enforcement
WWTF	Stormwater runoff	
WWTF	Sanitary tied into industrial facility discharges	Include monitoring requirements in permit
WWTF	Inadequate contact time with chlorine	Local permitting program with more stringent bacteria-specific requirements
WWTF		Greater enforcement
WWTF	New plants do not incorporate recommended BMPs and designs	Reinstate reviews of plans by TCEQ
WWTF	New plants not constructed according to plan	Begin WWTF construction inspections (possibly by TCEQ)
WWTF	TCEQ has insufficient enforcement authority	Reinstate 317 rules by TCEQ
WWTF	Unreliable test methodologies (IDEXX)	
WWTF		Reinspection fees

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Partial List of Possible Implementation Activities for Consideration

Workgroup	Causes/Sources	Implementation Activities and Targeted Critical Areas
WWTF	General	Strengthen the ability of TCEQ to conduct "focused investigations"
WWTF		Targeted, unannounced inspections will increase compliance

Bacteria Permit Limits
Rulemaking Stakeholder Meeting
9am, January 23, 2009
TCEQ Bldg F Rm 2210

1. Welcome & Introductions
2. Background
 - EPA Objections
 - TCEQ/EPA Agreement - Short & Long Term
3. Timeline for Rulemaking
4. Issues for Consideration/Discussion
 - Limitations to be placed in permits considering Water Quality Standards revisions
 - Monitoring frequencies - based on permitted flow (chlorination vs ultraviolet)
 - Chlorine & bacteria limitations - both required in permits
 - Bacteria sample holding times
 - Lab availability
 - Implementation - upon permit renewal/next permit action (compliance schedules)
 - Industrial - dedicated domestic outfalls vs. combined
 - Pond systems
 - Wet weather processing plants
 - Undersized chlorine contact chambers
 - Others
5. Questions/Answers
6. Adjournment