

Wastewater Treatment Facility Work Group DRAFT Meeting Notes Thursday, February 28, 2013 10:00 AM to noon H-GAC Conference Room C, Second Floor

#### **Attendees**

Frank Green (Montgomery County), Jonathan Holley (Harris County FCD), Steve Hupp (Bayou Preservation Association), Tom Ivy (Texas Stream Team), Carol Labreche on phone (City of Houston), Alisa Max (Harris County), Scott Nichols (Montgomery County), Ray Pavlovich (Nottingham Country MUD), Rachel Powers (H-GAC), Mary Purzer (AECOM), Kathy Richolson (Gulf Coast Waste Disposal Authority),

#### Call to Order/Welcome/Introductions

Rachel called the meeting to order and initiated self-introductions.

#### **Review Notes from Last Year**

Rachel provided the notes from last year in case they were needed for reference.

# **Update on I-Plan Approval Process**

The TCEQ unanimously approved the BIG I-Plan on January 30, 2013. The approved version included the changes to the I-Plan that had been discussed at previous BIG meetings. None of the changes were in the references sections.

#### **Review Annual Report format**

Rachel explained that the conceptual format for the annual report was developed in collaboration by the BIG and agreed to at the BIG mid-year meeting in October 2012. The report will consist of three main components:

- 1) At-a-Glance: The At-a-Glance section will be one 11x17 paper that includes cover page with a photo; a table of implementation activities, proposed milestones, and an evaluation of progress; and a sheet with background information, a map, and high-level review of progress overall.
- 2) A printed report: In addition to a narrative overview, the printed report will include information about progress and goals for each of the strategies in the plan. Each strategy will be described by a narrative description preceded by a tabular summary sheet, which will include recommendations from the workgroup to the BIG regarding progress, achievements, focus for the coming year, and revisions to the I-Plan.
- 3) Web-based support documents: If additional information, such as lengthy tables, are necessary, these will be provided in an on-line format.

**Review Implementation Progress--** The workgroup reviewed progress for each of the implementation activities, as follows.

# Implementation Strategy 1.0: Wastewater Treatment Facilities

- 1.1: Impose More Rigorous Bacteria Monitoring Requirements—Interim Milestones: Within five years, all of the permits should have had renewals initiated.
  - H-GAC will review permits after January 30, 2013, and DMR reports to confirm implementation.
  - The TCEQ tries to renew permits within a basin on the same five-year schedule. The following is a list of the schedule. We are already through many of these, although the West Fork and Clear Creek are both coming up soon. Basin Permitting Schedule (TAC Title 30 §305.71) expiration dates:
    - March 1, 2012: 1017 White Oak Bayou above tidal
    - May 1, 2012: 1014 Buffalo Bayou above tidal
    - June 1, 2012: 1010 Caney Creek, 1011 Peach Creek, 1013 Buffalo Bayou tidal
    - September 1, 2012: 1007 (Brays, Sims, Hunting, metro)
    - March 1, 2012: 1016 Greens Bayou above tidal
    - February 1, 2013: 1009 Cypress Creek
    - March 1, 2013: 1008 Spring Creek
    - May 1, 2013: 1006 (inc. Halls Bayou)
    - July 1, 2013: 1004 West Fork
    - September 1, 2013: 1100 Clear Creek
- 1.2: Impose Stricter Bacteria Limits for WWTF Effluent —Interim Milestones: Within five years, all of the permits should have had renewals initiated.
  - Rachel reported that H-GAC has done some preliminary analysis of DMR data.
    Some highlights of the preliminary studies include the following:
    - There are very few reported values for enterro.
    - Exceedances at small plants was statistically correlated with the percentage of permitted flow—the higher the flow relative to permitted capacity, the more likely an exceedance. This did not apply to medium and large plants.
    - Based on reported flow and bacteria levels in DMRs, the largest loads come from large facilities.
    - H-GAC identified flaws in some of the data that need to be addressed, and so Rachel did not hand out copies of the preliminary analysis.
  - Participants asked that H-GAC look at the following:
    - the age of the plant to see if there was a correlation with exceedences (or bacteria levels in general)
    - Correlation to rainfall events
    - Difference between UV and Chlorination disinfection
  - H-GAC will continue to review permits in the BIG project area for implementation.
    Up to this point, H-GAC has been doing a consistent job of including bacteria
    limits in domestic permits at the appropriate limit.
  - H-GAC will review permits after January 30, 2013, for compliance in Clear Creek watershed, which did not include the reduced limits since the TMDL was approved prior to the TCEQ decision to include bacteria limits.
  - H-GAC will continue to analyze DMR data to confirm implementation.

- 1.3: Increase Compliance and Enforcement by the TCEQ—Interim Milestones: An increase each year in:
  - The number of unannounced inspections conducted each year
  - The number of focused sampling investigations each year
  - The percentage of plans and specifications reviewed
  - The percent of DMRs reviewed
  - The number of other investigations conducted
  - The ability of TCEQ to conduct focused sampling investigations
  - Sources of data:
    - TCEQ's Annual Enforcement Report
    - TCEQ Regional Office data
  - Rachel reported that she had not had the opportunity to dig into this information for this year.
- 1.4: Improve Design and Operation Criteria for New Plants—Interim Milestone: Every five years, 20% of local governments will have considered whether to adopt stricter requirements. Note: the plan indicates that the revision process should start in year six of the plan (2018).
  - Harris County described their new program to review select plans for WWTF in Harris County. When a construction permit is submitted to Harris County for a WWTF, the permit will need to be accompanied by an information sheet about the facility. Based on information on the sheets (and possibly knowledge of the facility, engineer, or operator), a percentage of those plans will be reviewed by Harris County or a contractor to confirm compliance with state and local requirements for WWTF. This will only apply to some domestic WWTF and only in some situations. This program will probably start June 1, 2013.
  - TCEQ Chapter 217 is still open for input, and it still does not reference the old "grandfather" chapter 317. Stakeholders are encouraged to provide input during the process.
- 1.5: Upgrade Facilities—Over 25 years, all facilities requiring upgrades in order to meet bacteria limits in their permits will have been upgraded.
  - Stakeholders suggested that H-GAC track permit amendments to determine if upgrades were made to address bacteria. Harris County Pollution Control enforcement (Denise Hall) may be able to provide assistance.
- 1.6: Consider Regionalization of WWTFs—Interim Milestone: Develop a process of targeting WWTFs that are chronically non-compliant
  - No progress was reported.
- 1.7: Use Treated Effluent for Facility Irrigation—Interim Milestone: One WWTF shall install and use a new irrigation system utilizing treated effluent every five years.
  - Rachel reported that H-GAC had been examining Chapter 210: Use of Reclaimed Water to identify ways to identify facilities that are reusing water.

# **Confirm Recommendations to the BIG for Annual Report**

The work group reviewed the draft Implementation Strategy Cover Sheet for the Animal & Agriculture Strategy.

There were 10 attendees including 4 BIG members and 6 alternates.

The group proposed the following changes to the draft At-a-glance table:

- For IA 1.4, change status to "No information."
- For IA 1.6, change status to green, and to read, "Started, On schedule."

The proposed wording for Progress was appropriate.

The group proposed the following changes to the draft Achievements section:

• Add the number and percentage of facilities that are sampling for bacteria.

The group proposed the following changes to the draft Focus section:

- Provide more training for operators.
- The Harris County plan review initiative.

The group did not recommend revisions to the I-Plan.

# Adjourn

BIG Annual Meeting: Tuesday, May 14, 2013 Proposed WWTF Work Group Meeting: February 14, 2014, at the City of Houston's 69<sup>th</sup> Street Plant.