



**Sanitary Sewer System Workgroup  
Meeting Agenda  
Thursday, January 23, 2014  
10:00 AM to 12:00 PM  
H-GAC Conference Room B, Second Floor**

## **Call to Order/Welcome/Introductions**

## **Review Notes from Last Year's Meeting**

### **Discussion: Preparing BIG 2014 Annual Report – I-Plan Strategy 2.0 SSS**

Workgroup will review data source availability and past year BIG implementation activities related to I-Plan Strategy 2.0:

#### **Implementation Activity 2.1: Develop Utility Asset Management Programs for Sanitary Sewer Systems –**

2.1.1: Require a UAMP Plan as part of Wastewater Permit

2.1.2: Develop a series of webcasts and meetings to provide introductory information about UAMPs

#### **Implementation Activity 2.2: Address Fats, Oils, and Grease**

#### **Implementation Activity 2.3: Encourage Appropriate Mechanisms to Maintain Function at Lift Stations**

#### **Implementation Activity 2.4: Improve Reporting Requirements for Sanitary Sewer Overflows –**

2.4.1: Implement Statewide database to record reported SSOs, allowing operators of sanitary sewer systems to enter information directly into State of Texas Environmental Electronic Reporting System

2.4.2: Develop ability for communities to use statewide database to record reported SSOs

2.4.3: Require reporting of SSOs to local programs

#### **Implementation Activity 2.5: Strengthen Controls on Subscriber Systems –**

2.5.1: Identify subscriber systems

2.5.2: Develop model contracts

2.5.3: Provide a circuit rider program to work with WWTF permittees and subscriber systems to strengthen subscription contracts

#### **Implementation Activity 2.6: Restructuring Penalties for Violations**

### **Discussion: Review I-Plan Strategy 2.0 SSS Language**

Workgroup will review approved I-Plan wording. Workgroup will discuss potential editorial changes. Workgroup will agree on any updates and develop recommendations that will be presented at the annual BIG meeting for approval.

## **Adjourn**

### **Upcoming Meeting Schedule**

**May 27, 2014:** BIG Annual Meeting

**February 11, 2014:** Residential & Outreach, Animals & Agriculture

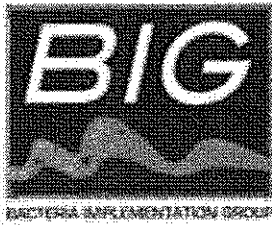
**February 13, 2014:** Illicit Discharges & Dumping, Onsite Sanitary Sewage Facilities

**February 20, 2014:** Stormwater System | Construction & Land Development

**March 11, 2014:** Watershed Outreach

**March 20, 2014:** Monitoring and Plan Revision | Research

**March 25, 2014:** Coordination and Policy



**Sanitary Sewer Systems Work Group  
Meeting Notes  
Friday, March 8, 2013  
2:15 pm to 3:00 pm  
H-GAC Conference Room A, Second Floor**

**Call to Order/Welcome/Introductions**

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

**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. Two of those changes included modifications to Implementation Activities 2.1 and 2.6.

**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 Activity 2.1: Develop Utility Asset Management Programs for Sanitary Sewer Systems**

- Progress
  - March 8, 2013—First annual Asset Management Workshop (CMOM) for Sanitary Sewer Systems in the greater Houston Region. 55 attendees.

- SSOI participation—information requested from the TCEQ.
- Discussion:
  - UAMP plans are not required, but H-GAC plans to survey wastewater permit holders to determine which facilities voluntarily have UAMP plans. H-GAC does not yet have appropriate contact information. Rachel will get phone numbers from Kim, and billing addresses from the TCEQ, and use those to get email addresses. With those three contact forms, H-GAC will work to query the WWTF in the BIG project area.
  - H-GAC, working with the TCEQ, Galveston Bay Foundation, WEAT, and other stakeholders, offered the first annual utility asset management for SSS immediately before the work group meeting. 53 people attended and evaluations were positive. At least six speakers have been identified for next year's workshop, which will be a two-day event. Raj Bhattaranji, who coordinates a similar workshop in Austin, was supportive and enthusiastic about the conference, which will be held in later February so as not conflict with the Austin CMOM conference.

#### Implementation Activity 2.2: Address Fats, Oils, and Grease

- Discussion:
  - The City of Dallas program looks great, and the Galveston Bay Foundation in particular is working to encourage adoption in our region.
  - Operators have concerns about rags/wipes, and recommended piggybacking rag/wipe info and programs onto the FOG info and programs.
  - Identifying appropriate contact information will be critical to gathering information identified in this activity (See I.A. 1.1)

#### Implementation Activity 2.3: Encourage Appropriate Mechanisms to Maintain Function at Lift Stations

- Discussion: Chapter 217, which deals with design criteria, is open to suggestions as the TCEQ considers modifications. They may hold a public input meeting in June 2013. Subchapter B includes provisions relating to emergency power requirements. BIG members are encouraged to participate in the process.

#### Implementation Activity 2.4: Improve Reporting Requirements for Sanitary Sewer Overflows

- Discussion
  - Rachel reported that she has been told, by sources at the TCEQ who prefer to remain anonymous, that the TCEQ is working to develop an on-line reporting system. They may also be developing a uniform format for submitting/collecting/compiling SSO information.
  - House Bill 824 / Senate Bill 584: These companion bills would limit SSO reporting requirements to spills 1500 gallons or more. The bills have influential sponsors. In general, participants recognized that such a change would reduce the burden on operators of sanitary sewer systems, but might make it more difficult to track the contributions that overflows make to bacteria loading. The

group discussed whether a lower limit might be beneficial, but did not reach a conclusion.

- Connected Texas has completed its statewide inventory of broadband internet connections. It is now working to expand access to broadband for various purposes such as emergency services and economic development. H-GAC plans to participate in the process for various reasons, including to facilitate electronic SSO reporting.

#### Implementation Activity 2.5: Strengthen Controls on Subscriber Systems

- Discussion:
  - H-GAC will request information about subscriber systems and subscriber system contracts when it contacts WWTF permittees to collect and share other information relating to the BIG, WWTF, SSS, and water quality.

#### Implementation Activity 2.6: Penalties for Violations

- Discussion
  - This section does not include a specific activity. However, as funds are available, H-GAC (or other stakeholders) can track occurrence of and penalties for SSS violations, using data from the TCEQ Region 13 enforcement report data and from the TCEQ's Annual Enforcement Report.
  - The TCEQ inspectors now have the ability to conduct focused SSO investigations. Among other investigations, during rain events they are visiting facilities that have never reported an SSO.
  - In December 2012, the TCEQ released a revised "Enforcement Initiation Criteria." This document includes criteria relating to sanitary sewer systems, grease blockages, power outages, etc. Michelle Bost shared information about the revised criteria during her conference presentation earlier in the day:  
<http://www.tceq.texas.gov/agency/eic.html>.

#### Identify Activities on Which to Focus Efforts

The workgroup recommended focusing on the following:

- Stakeholder participation in the Chapter 217 comment and revision process.
- SSO reporting system.
- H-GAC identifying appropriate contact information for tracking UAMP and identifying subscriber systems
- FOG education (GBF/regional collaboration and Cease the Grease)

#### Identify Possible Revisions to the I-Plan

The work group does not recommend changes to the I-Plan.

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

The work group reviewed the draft Implementation Strategy Cover Sheet for SSS. There were 13 attendees including 2 BIG members and 2 alternates. In addition to the information included

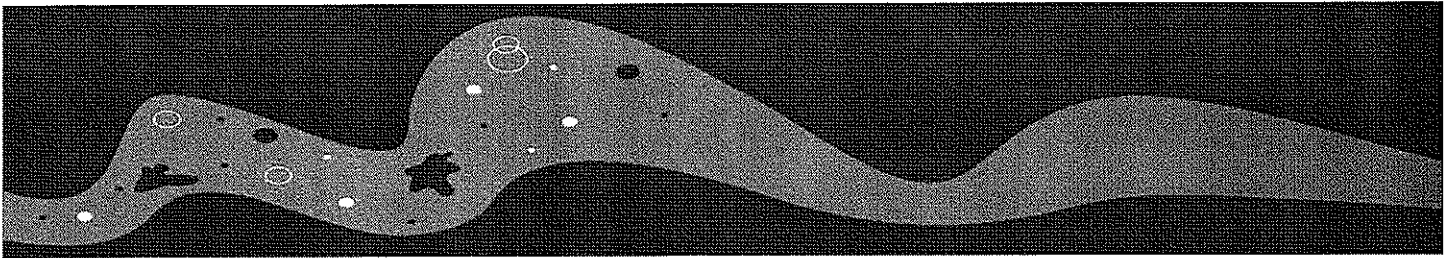
in the handout, the workgroup recommended adding TCEQ's focused SSO investigations to the achievements, and FOG education as a focus.

Rachel will send meeting notes and a draft section for the annual report as soon as they are available, and workgroup members will be able to provide comments. Workgroup recommendations will be reviewed by the Coordination and Policy and Plan Revision Workgroups at the meeting on March 28, 2013.

**Coordination & Policy work group meeting: March 28, 2013, 10:00 AM**

**BIG Annual Meeting: Tuesday, May 14, 2013**

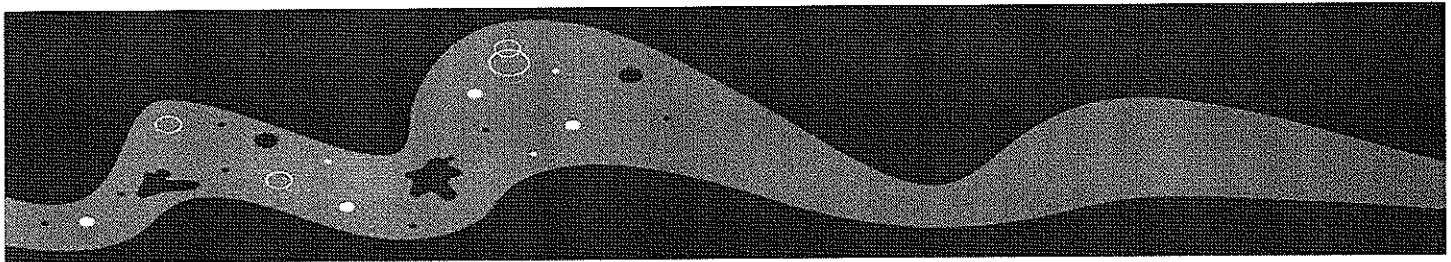
**Tentative 2014 Utility Asset Management (CMOM) for Sanitary Sewer Systems Conference & SSS Workgroup Meeting: February 27 & 28, 2014**



# Implementation Strategy 2.0: Sanitary Sewer Systems

#	Activity	Target/ Objective/ Milestone	Status
2.1	Develop Utility Asset Management Programs (UAMPs) for Sanitary Sewer Systems	-After five years, eight workshops held -After ten years, all WWTF have UAMP plans	In progress, On schedule
2.2	Address Fats, Oils, and Grease	Within five years: -Compile and share all existing regulations within project area -Each community shall examine their regulations and policies -One community shall adopt new regulation -Flyers or other collateral material distributed -Website created and distributed	In progress, On schedule
2.3	Encourage Appropriate Mechanisms to Maintain Function at Lift Stations	Every five years, 10% of SSS shall be compliant with recommendations	No information
2.4	Improve Reporting Requirements for SSOs	Within five years, EPA/TCEQ will have developed appropriate database and technology for collecting and sharing information regarding SSOs	In progress, On schedule
2.5	Strengthen Controls on Subscriber Systems	-By year three, develop model contract language -Within five years, develop list of subscriber systems -As funds are available, initiate circuit rider program	Not started, On schedule
2.6	Penalties for Violations	-Within five years, have appropriate penalty policy in place	Completed, Ahead of schedule

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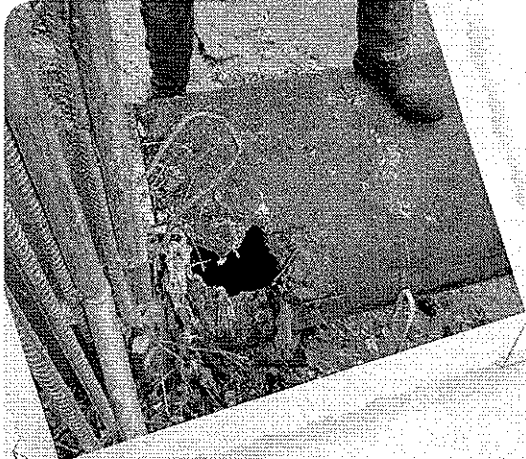
# Implementation Strategy 2.0: Sanitary Sewer Systems

*Continued*

## Work Group Recommendations

*Meeting March 8, 2013. 13 attendees, including 2 BIG members and 2 alternates.*

<p><b>Progress</b></p> 	<p>Progress has been adequate. Activity has begun and is ongoing for several implementation activities.</p>
<p><b>Achievements</b></p> 	<p>H-GAC hosted the first annual Asset Management for Sanitary Sewer Systems , and planning has begun for the 2014 conference. Galveston Bay Foundation has been in talks with the City of Dallas's to share its award-winning Cease the Grease program. TCEQ has begun conducting focused investigations to identify SSOs.</p>
<p><b>Focus</b></p> 	<p>Chapter 217 is "open" and the TCEQ is considering making changes to the Design Criteria for Domestic Wastewater Treatment Systems; stakeholders are encouraged to participate in the comment process. Stakeholders shall work with the TCEQ to develop the SSO reporting system. H-GAC shall work to identify appropriate contact information for tracking UAMP and identifying subscriber systems. Stakeholders will work to develop a coordinated FOG education program for the project area and region.</p>
<p><b>Revisions</b></p> 	<p>The work group does not recommend changes to the I-Plan.</p>



# SANITARY SEWER SYSTEMS

## 2

### Main Summary

Failure of sanitary sewer systems (SSSs) often results in sanitary sewer overflows (SSOs). SSOs result in discharge of untreated sewage into the watershed system before the sewage reaches a treatment facility. The microbial pathogens and other pollutants present in SSOs can cause or contribute to contamination of drinking water supplies, water quality impairments, beach closures, shellfish bed closures, and other environmental and human health problems. Based on estimates in total maximum daily load (TMDL) reports and/or draft technical documents, an average of 77 overflows were reported in the project area each month. These SSOs occurred in all but two of the project area's watersheds and represented a monthly average of over 700,000 gallons discharged without treatment.

To address these infrastructure deficiencies, BIG stakeholders recommend improvements to SSSs and lift stations, increased reporting of (and potential penalties for) SSO violations, and stronger controls on subscriber systems. Efforts in the past year have focused on developing capacity to increase both education and data collection activities that support implementation.

### Work Group Activities

Meeting March 8, 2013. 13 attendees, including two BIG members and two alternates.

#### Progress

Progress has been adequate. Activity has begun and is ongoing for several implementation activities.

#### Achievements

- H-GAC hosted a conference on asset management for SSSs. Planning has already begun for the 2014 conference.
- The Galveston Bay Foundation initiated coordination with the City of Dallas to share information about its award-winning "Cease the Grease" program.
- The Texas Commission on Environmental Quality (TCEQ) began conducting focused investigations to identify SSOs.

#### Focus

- H-GAC and BIG stakeholders aim to:
  - Work with the TCEQ to develop the SSO reporting system.
  - Participate in the comment process for Title 30, Chapter 217 of the Texas Administrative Code, which proposes changes to the Design Criteria for Domestic Wastewater Treatment Systems.
  - Identify appropriate contact information for tracking utility asset management programs (UAMPs) and identifying subscriber systems.
  - Develop a coordinated fats, oils, and grease (FOG) education program for the project area and region.

#### Revisions

The work group does not recommend changes to the I-Plan.



## Implementation Strategies

### 2.1 Develop Utility Asset Management Programs for Sanitary Sewer Systems

- Within five years, H-GAC, the TCEQ, or another appropriate entity shall offer at least eight educational workshops for owners, operators, and engineers.
- After 10 years, all wastewater treatment facility (WWTF) permits will have UAMPs.

- Not Started
- Initiated
- In Progress
- Completed
- Behind Schedule
- On Schedule
- Ahead of Schedule

#### Annual Progress and Applicable Programming:

- **UAMP Requirements.** The BIG suggests that all permits for new WWTFs discharging to a project area stream include a UAMP plan, and all permit renewals for WWTFs discharging to a project area stream include a UAMP plan starting five years from the approval of the I-Plan. As such, the TCEQ is not expected to require UAMP plans of existing facilities for SSSs until 2018.
- **TCEQ's Voluntary SSOI.** The TCEQ's voluntary Sanitary Sewer Overflow Initiative (SSOI) allows eligible municipalities to direct resources toward corrective actions rather than paying enforcement penalties. Program participation has more than doubled since program implementation in 2008.
- **EPA Listening Sessions.** In 2012, the U.S. Environmental Protection Agency (EPA) held listening sessions to seek stakeholder input to help determine whether and how to modify the National Pollutant Discharge Elimination System (NPDES) regulations as they apply to municipal sanitary sewer collection systems (MS4s) and SSOs.
- **CUPSS.** The EPA's voluntary "Check Up Program for Small Systems" (CUPSS) is a simple asset management tool for small drinking water and wastewater facilities. Desktop computer programs and training modules are available for free download from the Internet. The program provides a tailored asset management program based on a record of assets, schedule of required tasks, and financial management strategies.

### 2.2 Address Fats, Oils, and Grease

- Within five years, H-GAC and other local entities will:
  - Compile and share all existing regulations within the project area;
  - Examine each community's regulations and policies;
  - Distribute flyers or other collateral material; and
  - Develop and distribute a website.
- Within five years, one community shall adopt new regulations.

- Not Started
- Initiated
- In Progress
- Completed
- Behind Schedule
- On Schedule
- Ahead of Schedule

#### Annual Progress and Applicable Programming:

- **Model FOG Programs.** H-GAC staff and BIG stakeholders identified the following programs or entities as model programs or resources:
  - San Antonio Water System's "Don't Feed the Grease Monster" program ([www.saws.org/our\\_water/ResourceProtComp/FOG/index.shtml](http://www.saws.org/our_water/ResourceProtComp/FOG/index.shtml)).
  - City of Dallas' "Cease the Grease" program ([www.dallascityhall.com/dwu/Pretreatment/grease\\_abatement.html](http://www.dallascityhall.com/dwu/Pretreatment/grease_abatement.html)).
  - City of Houston's FOG ordinance that passed in 2007.
  - Clean Waterways' "Fats, Oil and Grease & the Environment" brochure.

### 2.3 Encourage Appropriate Mechanisms to Maintain Function at Lift Stations

- Every five years, 10 percent of SSSs shall be compliant with recommendations.

- Not Started
- Initiated**
- In Progress
- Completed

- Behind Schedule
- On Schedule**
- Ahead of Schedule

#### Annual Progress and Applicable Programming:

- Emergency Power Requirements.** The TCEQ is in the process of upgrading portions of Title 30, Chapter 217 (previously Chapter 317) of the Texas Administrative Code. Of importance to SSSs is Subchapter B, which addresses emergency power requirements.

### 2.4 Improve Reporting Requirements for SSOs

- Within five years, the EPA and TCEQ will develop appropriate database structure and technology for collecting and sharing information regarding SSOs.

- Not Started
- Initiated
- In Progress**
- Completed

- Behind Schedule
- On Schedule**
- Ahead of Schedule

#### Annual Progress and Applicable Programming:

- SSO Reporting Requirements.** H-GAC and BIG stakeholders have been tracking House Bill (HB) 824 and Senate Bill (SB) 584, two companion bills from the 83rd legislative session\* that would limit SSO reporting requirements to spills involving 1,500 gallons or more. This change would reduce the burden on operators of SSSs, but it might make it more challenging to track the impact of SSOs on bacteria loading.

\*Note: HB 824/SB584 can be accessed online at: [www.legis.state.tx.us/BillLookup/History.aspx?LegSess=83R&Bill=HB824](http://www.legis.state.tx.us/BillLookup/History.aspx?LegSess=83R&Bill=HB824).

- Electronic SSO Reporting.** Connected Texas completed a statewide inventory of broadband Internet connections. It is now expanding broadband access for various purposes such as emergency services and economic development. H-GAC plans to participate in the process to facilitate electronic SSO reporting and other considerations.

### 2.5 Strengthen Controls on Subscriber Systems

- By year three, H-GAC will work with attorneys for WWTFs, municipal utility districts, and stakeholders to develop model contract language.
- Within five years, H-GAC will develop a list of subscriber systems.
- As funds are available, H-GAC will initiate a circuit rider program.

- Not Started
- Initiated**
- In Progress
- Completed

- Behind Schedule
- On Schedule**
- Ahead of Schedule

#### Annual Progress and Applicable Programming:

- Subscriber System Information Exchange.** H-GAC continued to identify contact information for WWTF permit holders. This information is being used to collect information about individual subscriber systems and subscriber system contracts. H-GAC will also collect and share information relating to the BIG, WWTFs, SSSs, and water quality.

## 2.6 Penalties for Violations

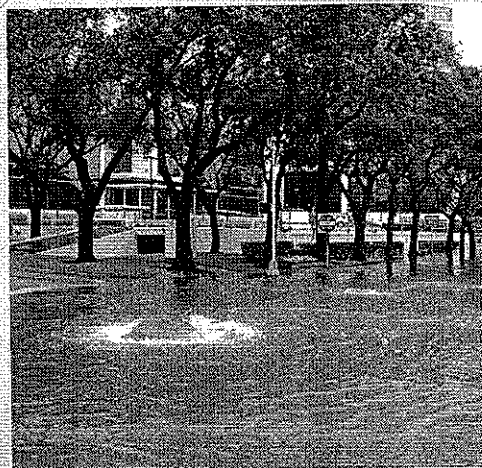
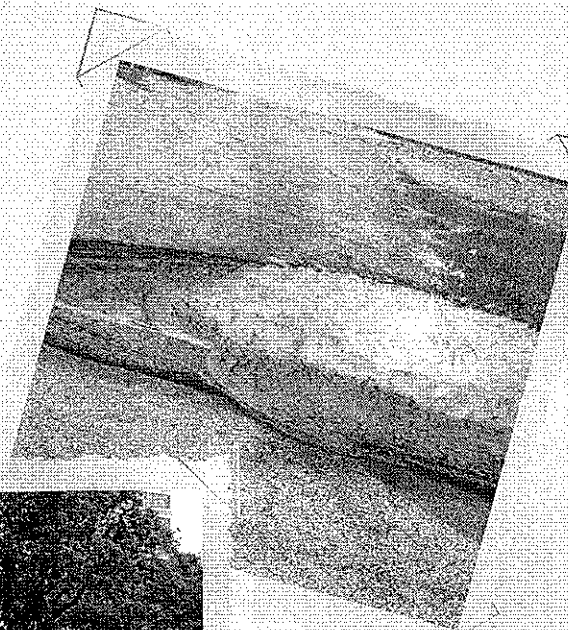
– Within five years, the TCEQ will have an appropriate penalty policy in place.

- Not Started
- Initiated
- In Progress
- Completed

- Behind Schedule
- On Schedule
- Ahead of Schedule

### Annual Progress and Applicable Programming:

- **TCEQ's Revised Criteria.** In December 2012, the TCEQ released a revised version of its "Enforcement Initiation Criteria." This guidance document included criteria relating to SSSs, grease blockages, and power outages, among other considerations.
- **SSO Investigations.** TCEQ inspectors now have the ability to conduct focused SSO investigations. For instance, they can visit SSS facilities during rain events even if the SSS facility has never reported an SSO.
- **Future Tracking.** As funds are available, H-GAC and BIG stakeholders intend to track the occurrence of and penalties for SSS violations. Information will be derived from the TCEQ's annual enforcement reports and other information resources.



## Implementation Strategy 2.0: Sanitary Sewer Systems

This implementation strategy focuses on the underground infrastructure (pipes), ancillary support processes (lift stations), and the management of the network of infrastructure that is connected to the wastewater treatment facility itself. Activities to be implemented in the wastewater treatment facilities are discussed in the previous section.

Sanitary sewers can fail to function properly due to blockages, line breaks, defects that allow stormwater and groundwater to overload the system, lapses in operation, inadequate design and construction, power failures, and vandalism. The EPA has concluded that sanitary sewer overflows (SSOs) contribute to bacteria loading in almost all impaired streams, but may or may not be a primary source of loading. EPA acknowledges that SSO data is difficult to assess.<sup>49</sup>

In a Report to Congress, the EPA addressed the extent and possible solutions to human health and environmental impacts caused by SSOs.<sup>50</sup> In the Houston region, sanitary sewer systems are separate and not intentionally combined with stormwater sewer systems. SSOs are untreated or partially treated discharges from sanitary sewers. "SSOs can range in volume from one gallon to millions of gallons. The microbial pathogens and other pollutants present in SSOs can cause or contribute to water quality impairments, beach closures, shellfish bed closures, contamination of drinking water supplies, and other environmental and human health problems."<sup>51</sup>

Based on estimates presented in the TMDL reports or draft technical documents, an average of 77 overflows were reported each month, representing a monthly average of over 700,000 gallons. Overflows were reported in all but two watersheds.

In general, implementation actions consist of encouraging improvements to sanitary sewers; reducing the amount of fats, oils, and grease entering the systems; addressing lift station inadequacies; improving reporting of violations; strengthening controls on subscriber systems;<sup>52</sup> maintaining an accurate map of sanitary sewer coverage; and evaluating the penalty structure for SSOs and other sanitary sewer violations.

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<sup>49</sup> (U.S. Environmental Protection Agency 2004)

<sup>50</sup> (U.S. Environmental Protection Agency 2004)

<sup>51</sup> (U.S. Environmental Protection Agency 2004)

<sup>52</sup> A subscriber system is a sewer system that conveys flow to a wastewater treatment facility that is owned by a separate entity. The term is not intended to indicate individual private laterals, such as a homeowner's connection to a sewer system.

not subject to permit requirements for UAMP plans. The BIG shall evaluate the adoption of UAMP plans and whether additional actions should be recommended.

These recommendations are intended to reduce bacteria loading by reducing the possibility of malfunctions such as blockages, line breaks, inflow and infiltration of stormwater and groundwater, lapses in operation, inadequate design and construction, power failures, and vandalism. By reducing the possibility of malfunction, the BIG intends that UAMP plans will reduce the possibility of discharges of untreated or partially treated sewage from a sanitary sewer system, at the same time they improve the services provided to customers.

Operators of existing systems are encouraged to develop a UAMP plan prior to the inclusion of these requirements in a permit. In general, components of the UAMP plan will include clearly stated goals, a description of the organization, the permittee's legal authority, an overflow emergency response plan, measures and activities, design and performance standards, a capacity assurance plan, provisions for self-audits, and a communication plan. Activities specified in the plan might include lift station maintenance, provision of alternative power sources such as generators for lift stations, periodic manhole surveys that include cover levels and wall condition, periodic line cleaning, and condition surveys. More details and resources for plan development are provided in Appendix D.

Operators of sanitary sewer systems are encouraged to seek technical assistance from either the TCEQ or the EPA as appropriate, although the oversight of neither agency is a requirement of the program. Owners and operators are encouraged to consider participating in the TCEQ's voluntary SSOI program as a means to improve system performance and to facilitate development of an appropriate UAMP plan. The TCEQ's Small Business and Local Government Assistance program is also a source of technical assistance.<sup>54</sup> Minimum elements of the UAMP plan would include the provision of updated coverage maps, confirmation of subscriber system registration (see Implementation Activity 2.5), and improved reporting requirements (see Implementation Activity 2.4). As resources are available, H-GAC shall collect and make available copies of UAMP, CMOM, and SSOI plans for reference.

The TCEQ is encouraged to make facilities that do not have a UAMP plan, and facilities that are not implementing their UAMP plan, higher priorities for inspections and enforcement.

***2.1.2: Develop a series of webcasts and meetings to provide introductory information about UAMPs***

H-GAC, the TCEQ, or another appropriate entity shall offer a series of meetings geared toward local sanitary sewer owners, operators, and engineers, providing introductory information about UAMPs. Meeting topics may include a description of the problems presented by sanitary sewer systems, a

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<sup>54</sup> See also "Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems" (U.S. Environmental Protection Agency 2005)

### **Implementation Activity 2.3: Encourage Appropriate Mechanisms to Maintain Function at Lift Stations**

Occasionally, lift stations may cease to function and may discharge sewage into waterways, as demonstrated during the extensive power outages following Hurricane Ike in 2008. Lift stations may also fail to function during circumstances other than power outages, such as mechanical failure or repair.

Lift station operators are encouraged to undertake appropriate actions to maintain function of lift stations during power outages and other situations. Operators shall develop a comprehensive plan, possibly part of the UAMP plan, to address such situations. Appropriate mechanisms for inclusion in the plan might include installing underground power lines to lift stations, negotiating with power providers to reclassify lift stations as a higher priority for service restoration, installing solar-powered generators, developing partnerships with transportation partners to allow hybrid vehicles to serve as mobile generators, installing quick-connects if the use of mobile generators is necessary, using by-pass pumps, or using a wireless remote system. Conventional generators, whether fueled by natural gas or diesel fuel, might also be appropriate. Owners and operators are strongly encouraged to install quick-connects at lift stations. Quick-connects allow the quick connection of lift stations to alternative power sources such as mobile generators without the need for time-consuming and expensive facility modifications during a post-storm or other failure.

### **Implementation Activity 2.4: Improve Reporting Requirements for Sanitary Sewer Overflows**

Current EPA regulations specify reporting requirements for noncompliance, including SSOs, in 40 C.F.R. §§ 122.41(1) (6) and (7) (2011).

#### ***2.4.1: Implement statewide database to record reported SSOs, allowing operators of sanitary sewer systems to enter information directly into State of Texas Environmental Electronic Reporting System***

The TCEQ should further develop its system to allow collection, analysis, and dissemination of this information. This action is not intended to increase the data-entry requirements for TCEQ staff; instead, it is intended to streamline reporting and analysis.

#### ***2.4.2: Develop ability for communities to use statewide database to record reported SSOs***

The existing TCEQ database security features require a broadband Internet connection for access. Until all sanitary sewer operators have access to a broadband Internet connection, database reporting should not be required.



metering, and the ability to pass on fines or other financial burdens resulting from violations of permit requirements and for unauthorized discharges.

***2.5.3: Provide a circuit rider program to work with WWTF permittees and subscriber systems to strengthen subscription contracts***

As resources are available, H-GAC shall provide a circuit rider program to review and evaluate subscription contracts and implement terms identified in this section. This program would proceed on a voluntary basis by watershed, using the geographic prioritization framework recommended by the BIG and described later in this I-Plan. As part of the program, education on UAMP, metering, and UAMP development assistance could be provided. Appropriate WWTFs, MUDs, and their attorneys and accountants would be expected to participate.

**Implementation Activity 2.6: Penalties for Violations**

The TCEQ recently revised its Penalty Policy #3 to address concerns raised during its most recent Sunset review. The legislature added Texas Water Code Section 7.067 to allow the TCEQ discretion to approve a Supplemental Environmental Project (SEP) that would assist local governments that are respondents in enforcement actions to come into compliance with environmental laws or to remediate the harm caused by those violations. The Statute requires the TCEQ to review the penalty policy regularly.