



## Upper Gulf Coast Oyster Waters TMDL Implementation Plan

**WWTF Workgroup Meeting Minutes  
Wednesday, December 11, 2013 11:00 AM  
GBF Conference Room**

**Participants:** Charlene Bohanon (GBF); Steven Johnston (H-GAC); Kim Laird (TCEQ); Ray Mayo (City of La Porte); Leonard Levine (GCWDA); Linda Broach (TCEQ)

**2013 Activities:** Ms. Bohanon provided stakeholders with a summary of management measure implementation that took place over the course of 2013. This included 2 TEEX Microbial Effluent Loading workshops (one H-GAC/one GBF hosted); first annual CMOM Houston (H-GAC); creation of guidance document – Troubleshooting Bacteria Levels at Wastewater Treatment Plants, RG-515 and accompanying photo gallery (TCEQ); received grant funding and began planning for regional Cease the Grease campaign (GBF); and GBF will be overhauling website including addition of resource page for WWTFs. The stakeholders recommended several outlets for distributing FOG materials including city and county citizen and employee newsletters, Take Care of Texas and other TCEQ newsletters, industry groups (Bayport Association, Ship Channel, Texas City, CAPs); Great Day Houston (Channel 11). Ms. Laird reminded group that permit holders with a FOG program will not be penalized if they have FOG-related SSOs, but TCEQ has not defined what qualifies as a FOG program in order to take advantage of this benefit. Anyhow, it is a good way to get municipalities to tie into the campaign. She also shared that TCEQ has been sending out postcards notifying all permit holders of the compliance regulations and association fines if there are violations. She is not sure if they will begin enforcing in December or early 2014. She shared that they have seen problems with smaller plants using pool chlorine tabs instead of WWTF grade tablets and they are issuing violations. She recommends a fact sheet on this topic and asked if it can be posted to GBF's WWTF resource page. The group also recommended posting these and other outreach materials on health district and county websites, if possible. Mr. Johnston shared that the H-GAC Bacteria Implementation Group workgroups will be meeting soon – WWTF workgroup meeting will be on January 16<sup>th</sup>, and they are launching the Jarboe Bayou TMDL and have a public meeting on December 12<sup>th</sup>. He is working on figuring out what activities he needs to continue on since he took over Rachel Powers' projects (CMOM Houston, etc.).

**I-Plan Comments to Address:** Ms. Bohanon updated the stakeholders on major content additions made to the I-Plan draft and went over questions she needed their input on in order to respond to TCEQ and TSSWCB comments.

- Section 1.0 – WWTFs
  - Added in status of whether or not each facility had been issued bacteria limits yet
    - Stakeholders were OK with this addition
- MM 1.1 – Guidance and Training
  - Added in specifics on guidance documents and workshops (titles, agencies responsible, etc.)
    - Stakeholders were OK with this addition

- Should we add method of evaluation of this MM?
    - Stakeholders recommended keeping workshop attendance records; carrying out 10% follow up calls to ask effectiveness of workshop and application at plants; written evaluations for knowledge change; request data on number of outreach materials distributed by various groups, calls, website hits, etc.
- MM 1.2 – Pre-Permit Renewal Sampling
  - Omit this section because almost all plants in project area already have their bacteria limit?
    - Stakeholders want to leave this section in the I-Plan because they feel it is a very good idea for future groups to model their management measures off of. They recommend adding a paragraph in explaining why it is being left in and a summary of what was done in this project area to complete this measure.
- MM 1.3
  - Best way to share effluent compliance history?
    - Stakeholders recommend wording in terms of compliance versus exceedance or violation – more positive. They would like to see it broken down by year and have columns for the number of samples taken and number of samples compliant, and then totaled at the bottom for overall number and % compliance for project area each year.
    - Mr. Levine recommended analyzing the compliance data for improvements in terms of how much the bacteria limit was exceeded. For example, if the plant went from exceeding by a lot to a little, then that is an improvement. Stakeholders recommended that this is something to be included in the annual report.
- MM 1.4
  - Best way to share SSO history?
    - Stakeholders discussed how to accurately describe the overall status on SSOs in the project area considering that many facilities do not have any reported SSOs in ten years, which is not likely accurate. The group recommended adding a statement that discusses, in general, it is expected that there will be some SSOs due to aging infrastructure, that it can be difficult to report them because it is very staff dependent (ex. – Galveston inspection team) so they may not always observe them even though they are taking place. In terms of the data, the group recommended displaying it similar to the compliance history for MM 1.3.
- MM 1.4a
  - Added number of SSOI participants
    - Stakeholders were OK with this addition
- MM 1.4b
  - Added specifics on Cease the Grease
    - Stakeholders were OK with this addition
  - Best way to assess who already has FOG ordinances?
    - Mr. Mayo recommended talking to public works managers, don't try to find on their websites.
    - Determine which WWTFs in project area have to deal with FOG and if it is municipal, has restaurants or just an on-site cafeteria.
    - Add in wording to say “ordinance or other control” because some WWTFs might not have ordinances (not a city, etc.).
  - Separate roots from FOG because of Cease the Grease focus on FOG alone?
    - Stakeholders were OK with this addition

- Load reductions
  - Agencies recommend concentration limits/targets vs. reductions
    - Stakeholders are OK with this change. Ms. Broach believes this is more accurate because at this point it would be impossible to measure the load reductions over time in this project area. Stakeholders recommended emphasizing our efforts to measure improvements by concentrations, in addition to all of the other non-water quality tracking methods in the plan.

### **Summary**

- Bravos for the Bay – January 16<sup>th</sup>, 6:30-8:30pm, Texas Corinthians Yacht Club
- Action items
- Next meeting – TBD

### **Adjourn**