

Kerry D. Maroney

From: Marlo Berg [Marlo.Berg@tceq.texas.gov]
Sent: Tuesday, July 23, 2013 8:07 AM
To: Kerry D. Maroney; Russell Schreiber; Daniel Nix
Cc: Joel Klumpp; James Weddell; Vera Poe; Linda Brookins; Jaya Zyman-Ponebshek; Rebecca Villalba
Subject: Wichita Falls DPR Project - Pretreatment Comments
Attachments: WF Pretreatment questions.docx

Daniel,

Attached are TCEQ's comments on your pretreatment program. We can discuss during our Thursday meeting.

Thank you,

Marlo

From: Kerry D. Maroney [<mailto:kdm@bmiwf.com>]
Sent: Friday, July 19, 2013 10:24 AM
To: Marlo Berg; Joel Klumpp; James Weddell; Vera Poe
Cc: Russell Schreiber; Daniel Nix
Subject: Wichita Falls DPR Project - PDF of Attachments 2nd Set of Responses to TCEQ

Marlo: Based on our conference call yesterday and as requested, please see the PDF Attachments for the 2nd set of Wichita Falls responses. As you are aware, hardcopies were previously sent by Fed-Ex.

Call with questions or comments.

Kerry D. Maroney, P.E.

City of Wichita Falls Pretreatment Program Operations during the DPR Project

In order to increase the measures in place to protect the supply of drinking water, human health, and the environment, the TCEQ recommends that the City of Wichita Falls take the following actions.

- Do not accept hauled waste at the River Road Wastewater Treatment Facility (WWTF) during the operation of the temporary direct portable reuse facility.
- Do not accept Underground Storage Tank (UST) clean up waste at the River Road WWTF during the operation of the temporary direct portable reuse facility
- Do not accept waste streams from the Liquid Waste Processing facility at the River Road WWTF during the operation of the temporary direct potable reuse facility.
 - If liquid waste processing waste must be accepted, please provide a procedure of how the WWTF will assure that there will be no impact of the waste on the operation of the WWTF and the quality of the WWTF effluent. Require any Centralized Waste Treatment (CWT) facility to perform a comprehensive evaluation of each wastestream source for existing wastestreams and evaluate how such wastestreams impact the CWT's treatment process and its ability to comply with local limits. Require the CWT to inform the city of the results of the evaluation and obtain written approval from the city prior to accepting the wastestream. The city should verify the categorical determination of Liquid Waste Processing and revise the industrial discharge permit as necessary to reflect accurate categorization, effluent permit limit limits, and other conditions or requirements. The city needs to pay close attention to the definition of CWT wastewater and CWT wastewater sources.
- Do not allow new users to discharge to River Road WWTF during the operation of the temporary direct portable reuse facility.
- Do not allow Significant Industrial Users (SIUs) to substantially increase the volume or change the characteristic of their discharges to the River Road WWTF.
- Reassess the TBLs before the beginning of the diversion of the effluent to be used as a supply source for the drinking water plant.
- Perform a comprehensive investigation of the Sheppard Air Force Base (SAFB) to identify all the waste streams in each building including those operated by any tenants located at SAFB. Please pay close attention to any medical operations. Coordinate the investigation with Mr. Eric Agnew of TCEQ's Region4 Office. Please provide an inspection report to TCEQ that includes all the waste streams in each building that discharge and how each waste stream is or will be managed before the end of the full scale verification study.
- Require the facilities permitted and regulated under the Metal Finishing Point Source Category (40 CFR Part 433) to submit and implement a Toxic Organics Management Plan (TOMP) and obtain written approval from the city. The industries shall provide required certifications each month during the operation of the temporary direct portable reuse facility. The TOMP will aide to manage toxic organics and prevent their discharge to the sanitary sewer system. During the inspections of these type of industries, the city should also conduct a thorough review of chemicals used to ensure that no chemicals are being used or stored at the facilities that contain any TTOs and verify procedures stated in the TOMP are adequate and are being followed. The city needs to require the industry to make any modifications necessary in order to ensure that toxic organics will not be introduced into the sanitary sewer system. Modifications to the TOMP need to be reviewed and approved by the city before the industries make the changes to their operations.
- Require all permitted SIUs to develop and implement a Slug Discharge Control Plan (SDCP) that includes detailed accidental spill cleanup and notification requirements. For facilities that currently have an approved SDGP, evaluate its effectiveness and require modifications as needed to ensure that slug loads will be prevented and that adequate procedures exist to respond to worst-case accidental spills and notification

procedures to the city's pretreatment program and WWTF personnel if a slug discharge or accidental spill occurs. The city shall approve all SDCPs and revisions to them in writing.

- Notify all permitted or regulated industrial users (IUs) of the project, and require them to notify the City of Wichita Falls of any substantial changes in the discharge volume of a regulated wastestream (e.g., an increase or decrease of 20% or greater) or other changes in characteristics of their discharge, as well as any significant changes in their manufacturing process, facility operations, or wastewater treatment process. The city shall keep documentation of notifications to each regulated IU.
- Encourage all permitted or regulated IUs to seek ways to minimize waste, reduce use of raw materials by increasing the efficiency of their production activities (e.g., maximizing product yield and minimizing by-products), improve the efficiency of their wastewater treatment system, substitute less-toxic chemicals, and implement any other pollution prevention activities that will reduce the volume and concentration of pollutants discharged to the sanitary sewer system.