



BIGGS & MATHEWS, INC.

Consulting Engineers

July 29, 2013

Joel Klumpp, Team Leader
Technical Review & Oversight Team MC-159
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

RE: City of Wichita Falls
PWS ID No. 2430001
Temporary Direct Potable Reuse Project
Response to TCEQ Pretreatment Comments

Dear Mr. Klumpp:

On July 23, 2013, as part of their continuing DPR review process, the Texas Commission on Environmental Quality (TCEQ) provided us by E-Mail (Attached) comments on the City of Wichita Falls Pretreatment Program. In addition, at our conference call on Thursday, July 25, 2013, we had more detailed discussions regarding this program.

Having reviewed the various comments, we are providing the following responses:

TCEQ COMMENTS:

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.*

Response: The City agrees and will divert all waste haulers to the City's Northside WWTP during the operational period of the DPR Project.

- *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*

Response: The City has never accepted UST waste and we do not intend to change this practice.

- *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.*

Response: The city currently has only one Liquid Waste Processing (LWP) facility that contributes flow to the RRPOTW. The facility has recently undergone an upgrade of all their equipment, added new flow monitors, re-plumbed most of their facility, and added safe guards to prevent untreated waste from escaping the facility. These improvements have given the owners much better control over their processes. The City also requires the company to submit a copy of all manifests of every load of waste delivered to their facility. This information gives the City a better idea as to the volume and type a wastes entering the facility. The facility processes mainly grease trap waste. We have also increased their sampling requirement for BOD. At this point the City has a good handle on the operations of the facility. The facility is located approximately 4 miles from the POTW and the discharge from the facility is significantly diluted with other wastewater flow prior to it entering the POTW.

Even through the City feels that we have a good handle on the operations occurring at the LWP facility, the City will increase informal inspections of the facility during the operations of the DPR project.

- *Do not allow new users to discharge to River Road WWTF during the operation of the temporary direct portable reuse facility.*

Response: All new industrial development is required to complete a Baseline Monitoring Report of their wastewater so that the industry can inform the City as to the constituents of their potential waste stream. Any potential industrial flow which may have a potentially negative impact on the City's ability to utilize the DRP project will not be allowed. The City feels this is adequate to ensure any potential new waste streams will not interfere with the DPR project. The city is committed to protecting the wastewater effluent and will take all actions necessary to protect this new raw water supply.

- *Do not allow Significant Industrial Users (SIUs) to substantially increase the volume or change the characteristic of their discharges to the River Road WWTF.*

Response: All industries in the pretreatment program are required to inform the city of any substantial changes in flow volumes, manufacturing process, or changes in pretreatment practices 30 days in advance of making these changes. Notification is a requirement of the Code of Federal Regulations (CFR), City Ordinance, and the City's Industrial User Permit.

- *Reassess the TBLLs before the beginning of the diversion of the effluent to be used as a supply source for the drinking water plant.*

Response: The current TBLLs were established 2002 when the City actually had several other very large industries contributing flow to the POTW. When the TBLLs were established there was a 10% factor of safety built into the limits. With the closure of at least 3 large industries there is an even greater factor of safety built into the TBLL's at this point. If the TBLL's were to be reassessed at this point, they would likely increase rather than decrease, therefore the City does not plan to reassess or change the current TBLLs.

All constituents in the treated effluent are currently well below MCL for drinking water, therefore it would appear the TBLLs are adequate.

- *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.*

Response: An annual inspection of SAFB was performed in November of 2012 and an informal inspection was performed in December 2012. The base has a long standing history of compliance with the City's pretreatment program. Also SAFB has no industrial processes that are regulated under 40 CFR. It should also be noted that flow from the medical clinic on the base is treated at the City's Northside WWTP.

The City makes annual and periodic informal inspections of the base and is well informed of the practices occurring on the base. We have a great working relationship with the Base Civil Engineer, Mr. Mark McBurnett, who is also a member of the City's Water Resources Commission. Mr. McBurnett oversees the pretreatment program on the base and is well aware of the City's DRP project and the implications of any potential upset caused by contributing industrial flow. The City feels that we have full comprehension of the operations of the Base as it relates to the City's pretreatment program and an investigation is unnecessary.

- *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.*

Response: The City only has three industries that fall into the categorical classification of a metal finisher. None of them have toxic organic chemicals on site. Each industry has a current TOMP that is reviewed by the City on an annual basis. Each facility is also inspected for the absence of any toxic organic chemicals as each industry has specified. Also every six months all Metal Finishers submit a certified statement that the TOMP is being implemented. With this TOMP plan the industries are not required to sample for TTO; however, the City samples each permitted metal finisher facility annually for TTO as a check .

- *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 SDCP, 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.*

Response: Howmet, PPG, and IMC currently have a Slug Control Plan in place. Each Slug Control Plan is reviewed during the annual inspection process by the City. All of the other industries Permitted is not needed. Every industry Permitted by the City's Pretreatment Program does have a SPCC plan. by the City have been determined, based on the annual inspection process, that a slug control plan.

- *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.*

Response: All industries in the pretreatment program are required to inform the city of any substantial changes in flow volumes, manufacturing process, or changes in pretreatment practices 30 days in advance of making these changes. Notification is a requirement of the Code of Federal Regulations (CFR), City Ordinance, and the City's Industrial User Permit.

- *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.*
The City's Pretreatment Program follows all rules and regulations set by the EPA and TCEQ and continuously reviews the 40 CFR throughout the year insuring that each industry in the Pretreatment Program is being regulated by the correct standards set out by the CFR.

Response: During annual facility compliance inspections, pollution prevention and waste minimization are specifically discussed during the pre-inspection interview. At this time the City inspectors pass along any information from industry associations, the EPA or the TCEQ. Additionally, users are informed that pollution prevention and waste minimization are important criteria for receiving the City's annual Certificates of Excellence in Pretreatment award. Finally, in all user permits it is noted that implementation of appropriate Best Management Practices to the maximum extent practicable and comprehensive integration of Pollution Prevention in all of its activities shall constitute evidence of Good Faith and MAY result in less stringent enforcement action than otherwise required by the City's Enforcement Response Plan.

The City's current pretreatment program consists of 5 categorical industries and 3 SIUs. The total average daily industrial flow is 0.55 MGD and is approximately 6% of the entire daily average flow being treated at the RRWWTP. The largest percentage of the industrial flow is contributed by SAFB, which is a Significant Industrial user not a Categorical Industrial user. A large percentage of the waste from SAFB is domestic waste contributed by dorms, cafeterias, and other housing facilities with very little waste being produced from industrial process.

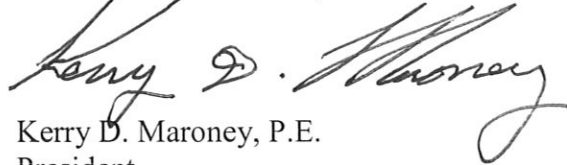
Also due to having so few industries in this program the City is afforded the luxury of staying very involved with each industry and staying abreast of any potential conflict, non-compliance, or other issue that could potentially arise. The City also recently created an Environmental Coordinator position to manage the pretreatment program.

In an effort to safeguard the wastewater effluent, the City will inform all industries in the pretreatment program of the pending DPR project. We will reinforce their need to comply with all pretreatment regulations and make them aware of the potential implications that changes in their process could have on the City's ability to utilize the wastewater effluent as a source water. We will also perform informal inspections of each industry on a monthly basis during the duration of the DPR Project .

As you have additional questions please provide those in a timely manner for our response.

Sincerely,

BIGGS & MATHEWS, INC.

A handwritten signature in black ink, reading "Kerry D. Maroney". The signature is fluid and cursive, with the first name "Kerry" being the most prominent.

Kerry D. Maroney, P.E.
President

Cc: Russell Schreiber, P.E.
Public Works Director
City of Wichita Falls, Texas

Daniel Nix
Public Utilities Operations Manager
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