2020 Industry Meeting

September 15, 2020

Where Connections Happen

CARROLLTON
TEXAS

Meeting Agenda

- Welcome – **Sign into the chat window.**
- Pretreatment Year 2019 – 2020 Review
- Consistently Compliant Industries
- Environmental Distinction Awards
- Reporting Requirements
- Pretreatment Sampling
- Surcharges
- TRA CRWS Major Modifications
- Streamlining Updates
- Pretreatment Year 2020 – 2021 Milestone Completion Dates
- What is Stormwater?
- Stormwater Permits
- Common Stormwater Issues
- Volunteer Opportunities

Definitions

- BMP – Best Management Practice
- BMR – Baseline Monitoring Report
- BOD – Biochemical Oxygen Demand
- CFR – Code of Federal Regulations
- COD – Chemical Oxygen Demand
- CRWS – Central Regional Wastewater System
- DCO – Designated City Official
- DMR – Discharge Monitoring Report
- ERP – Enforcement Response Plan
- IU – Industrial User
- MSGP – Multi-Sector General Permit
- POTW – Publicly Owned Treatment Works
- SDMR – Semiannual Discharge Monitoring Report
- SIU – Significant Industrial User
- SNC – Significant Noncompliance
- TBLL – Technically Based Local Limits
- TCEQ – Texas Commission on Environmental Quality
- TOMP – Toxic Organic Management Plan
- TRA – Trinity River Authority
- TSS – Total Suspended Solids

Pretreatment Year 2019-2020 Review

- Twenty-four (24) SIU pretreatment/stormwater inspections
- Sixty-nine (69) IU pretreatment/stormwater inspections
- City of Carrollton recorded ninety (90) sampling events for SIUs/IUs
  - Does not include industry resamples
- One (1) One Time Compliance Report
- Four (4) SIUs/IUs participated in the stormwater Adopt-A-Spot program
- Submitted City of Carrollton Annual Report to TRA

Pretreatment Year 2019-2020 Consistently Compliant Industries

- Electro Plate Circuitry – Capital
- Electro Plate Circuitry – Century
- Halliburton Energy Services
- Illes Foods – McKenzie
- Image Industries
- International Flavors & Fragrances
- International Paper – Belt Line Road
- MI Windows & Doors
- QPC
- Rudy’s Tortillas
- Ruskin Rooftop Systems
- Texas Finishing Company
- United 1 Laboratories
- Wash Solutions
- WMC Industries

Pretreatment Year 2019-2020 Environmental Distinction Awards

Compliance Awards History

- Established during the 2002 – 2003 Pretreatment Year
  - Pollution Prevention Achievements, Environmental Sustainability, Environmental Leadership
- All regulated industries that are consistently compliant with the City of Carrollton regulation programs, are invited to apply.
  - Electronic questionnaire due by **November 20, 2020**.
- Awards ceremony held during the December City Council Meeting.
- Published on the City of Carrollton main webpage, and the Pretreatment Program webpage.

Reporting Reminders

Semiannual & Quarterly Discharge Monitoring Reports

- Submit **all** sampling data (city sampling / self monitoring) for the reporting timeframe.

Timeframe	Deadline	Report
June – August	September 25th	DMR (if required)
September – November	December 25th	SDMR
December – February	March 25th	DMR (if required)
March – May	June 25th	SDMR

- SDMR and/or DMR forms **must** be submitted electronically prior to mailing.
  - Mail or deliver sampling data, water bills, and original wet signatures to City Hall.
- Use updated fillable forms.

Reporting Reminders

Industry: _____ Reporting Period: _____
Permit No: _____

CARROLLTON TEXAS

ENVIRONMENTAL SERVICES DEPARTMENT
PRETREATMENT SEMI-ANNUAL REPORT

Reporting Period: _____

INDUSTRY PERMIT NO.: _____ **SIC CODE:** _____
PROCESS: _____

SECTION A - GENERAL INFORMATION

Industry Name: _____
Street Address: _____
Phone: _____ Fax: _____
Industry Representative: _____ Email Address: _____
Authorized Signatory: _____
Name on Water Bill: _____

Part 1. Monthly water use figures per account, as shown on water bills for reporting period:
(Please include copies of water bills)

Account No.	Month	Consumption (in gals)

Total Consumption: _____
No. of work days in report period: _____ Avg. daily water use: _____
Avg. no. of employees in report period: _____
Production volume in report period: _____ Avg. daily production: _____

Part 2. List water usage on premises - list by account(s) and base calculations on no. of work days

Account No.	Type	Average Water Usage (gal/day)	Estimated (E) / Measured (M)
	a. Contact cooling water		
	b. Non-contact cooling water		
	c. Boiler feed		
	d. Process		
	e. Sanitary		
	f. Air pollution control		
	g. Contained in product		

CARROLLTON TEXAS

CITY OF CARROLLTON
ENVIRONMENTAL SERVICES DEPARTMENT
DISCHARGE MONITORING REPORT

FIRM NAME / PERMITEE _____ PERMIT NO. _____
FACILITY ADDRESS _____ SAMPLE DATE _____
NAME OF WASTE STREAM _____ SAMPLE TYPE _____
SAMPLING TIME AND INTERVAL _____
REPORTING PERIOD: From ___/___/___ to ___/___/___

POLLUTANT OR POLLUTANT PROPERTY	CONCENTRATION (mg/L) Permit Limit / Lab Result	POLLUTANT OR POLLUTANT PROPERTY	CONCENTRATION (mg/L) Permit Limit / Lab Result
	/		/
	/		/
	/		/
	/		/
	/		/
	/		/
	/		/
	/		/

Name of laboratory conducting analyses _____
Name of personnel who collected samples _____
CERTIFIED STATEMENT: Pretreatment standards for this waste stream are ___ are not ___ being met on a consistent basis.
Additional operation and maintenance required to ensure compliance is as follows or is attached _____
Max daily wastewater flow _____ (gpd) Avg daily wastewater flow _____ (gpd)
Avg daily production volume _____ Number of production days _____

AUTHORIZED REPRESENTATIVE CERTIFICATIONS:

A. **REPORT CERTIFICATION:** "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

_____ Date _____
A. Signature of authorized representative attesting to the **Report Certification** as shown above.

B. **TOXIC ORGANIC MANAGEMENT CERTIFICATION:** Applies only to industries subject to Total Toxic Organic (TTO) monitoring requirements and having an approved TTO management plan: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation (or pretreatment standard) for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting (or control) authority."

_____ Date _____
B. Signature of authorized representative attesting to the **Toxic Organic Management Statement** as shown above.

Reporting Reminders

Changes in Flow

- Section 171.33(A) Each user must notify the DCO of any planned significant changes to the user's operations or system which might alter the nature, quality, or volume of its wastewater before a change is made.
- Section 171.33(D) Significant changes include, but are not limited to, flow increases of 20 percent or greater, and the discharge of any previously unreported pollutant that are determined to be of concern.
  - After completion of the CRWS major modification, **all** flow changes greater than 20% will have to be reported to both the City of Carrollton and the TRA

Pretreatment Sampling

- If sampling indicates a violation, the SIU/IU must repeat the sampling and submit analytical results within 30 days after becoming aware of the violation.
  - Three resamples must be taking in response to a permit effluent violation.
  - If resampling shows a violation, the process must be repeated until three clean samples are recorded.
- If the SIU/IU performed the initial sampling, the SIU/IU must notify the POTW within 24 hours of becoming aware of the violation in addition to performing follow-up sampling and analysis.

Pretreatment Sampling

- All local limits must be sampled at least once per permit cycle.
- All categorical limits must be sampled at least semiannually.
- Surcharge parameters can be sampled semiannually or quarterly (depending on past trends).
- Currently reviewing and updating permits to ensure there is no unnecessary sampling.

Pretreatment Charges and Fees - Surcharges

- Section 171.59(c)(1) The city may surcharge users for the treating of abnormal strength wastes, either as a single user surcharge or as a class surcharge.
- Section 171.59(c)(2) The DCO shall have the authority to review and approve the discharge of all water or wastes having high strength concentrations of:
  - A five-day BOD greater than 250 mg/l; or
  - Containing more than 250 mg/l of TSS; or
  - A COD greater than 625 mg/l.

Pretreatment Charges and Fees - Surcharges

- Section 171.59(3) Where the DCO has approved the admission of high strength BOD, TSS, or COD into the POTW that discharge may be subject to a surcharge as determined by the DCO. The surcharge may be calculated on BOD and TSS values different from the normal concentrations of 250 mg/l, or a COD concentration of 2.5 times that of the BOD concentration.
- Section 171.59(6) The surcharge will be billed monthly, in addition to the usual monthly sewer service user fees.

Pretreatment Charges and Fees - Surcharges

- Section 171.59(7) The surcharge shall be calculated according to the following formula:

  Surcharge = [Q] [a (BOD – x) + b (TSS – y)] [8.34] [c]

- Or, for those abnormal wastes having a COD concentration 2.5 or more times that of the BOD concentration, the surcharge may, at the discretion of the DCO, be based on the COD category in lieu of the BOD category. Thus the surcharge shall be calculated according the following formula:

  Surcharge = [Q] [a (COD – Z) + b (TSS – y)] [8.34] [c]

Pretreatment Charges and Fees - Surcharges

- Section171.59(7) Where the value of BOD, COD, and/or TSS will be an average of values determined by testing procedures, as defined in this chapter, on samples collected and/or accepted by the DCO. If the average of these concentrations is less than the value for the respective x, y, or z, that term of the equation shall be dropped from the surcharge calculation.

Pretreatment Charges and Fees - Surcharges

Q	Wastewater flow in million gallons per month
8.34	Weight in pounds of one gallon of water
x	Level of BOD in mg/l, above which a surcharge is assessed
y	Level of TSS in mg/l, above which a surcharge is assessed
z	Level of COD in mg/l, above which a surcharge is assessed
a	Unit cost in dollars, of treatment per pound of BOD or COD
b	Unit cost in dollars, of treatment per pound of TSS
c	Administrative overhead recovery factor in dollars
BOD	Measured amount of BOD, mg/l
COD	Measured amount of COD, in mg/l
TSS	Measured amount of TSS, in mg/l

Pretreatment Charges and Fees - Surcharges

Surcharge =	(Q) {Surcharge Multiplier}		
Surcharge =	(Q) {(0.001) (8.34) [a(BOD-250) + b(TSS-250)] (c)}		
	or		
Surcharge =	(Q) {(0.001) (8.34) [a(COD-625) + b(TSS-250)] (c)}		
Q	Wastewater Flow, Mgal/mo		
0.001	Conversion Factor, Mgal/mo to MMgal/mo		
8.34	Conversion Factor, mg/L to lb/MMgal		
0.08162	a = $/lb BOD or COD Unit Charge		
0.12381	b = $/lb TSS Unit Charge		
1.3	c = CoC Admin Overhead Factor		
COD	Averaged from Sample Testing	625	
BOD	Averaged from Sample Testing	250	
TSS	Averaged from Sample Testing	250	

Date	COD (mg/L)	BOD (mg/L)	TSS (mg/L)	Data
1/21/20	3050	1090	590	City
04/14/2020	5820	3870	2080	City
AVERAGES:	4435.00	2480.00	1335.00	

BOD/TSS:

Surcharge = (Q) {(0.001) (8.34) [0.08162*(2480.00-250) + 0.12381*(1335.00-250)] (1.3)}

3.430

COD/TSS:

Surcharge = (Q) {(0.001) (8.34) [0.08162*(4435.00-625) + 0.12381*(1335.00-250)] (1.3)}

4.828

- COD is not 2.5 times the BOD; therefore, COD will not be used in the equation.
- Both BOD and TSS are above 250 mg/l and will be included in the surcharge calculation.

Pretreatment Charges and Fees - Surcharges

Surcharge =	(Q) {Surcharge Multiplier}	
Surcharge =	(Q) {(0.001) (8.34) [a(BOD-250) + b(TSS-250)] (c)}	
	or	
Surcharge =	(Q) {(0.001) (8.34) [a(COD-625) + b(TSS-250)] (c)}	
Q	Wastewater Flow, Mgal/mo	
0.001	Conversion Factor, Mgal/mo to MMgal/mo	
8.34	Conversion Factor, mg/L to lb/MMgal	
0.08162	a = $/lb BOD or COD Unit Charge	
0.12381	b = $/lb TSS Unit Charge	
1.3	c = CoC Admin Overhead Factor	
COD	Averaged from Sample Testing	625
BOD	Averaged from Sample Testing	250
TSS	Averaged from Sample Testing	250

Date	COD (mg/L)	BOD (mg/L)	TSS (mg/L)	Data
2/20/20	892	540	202	City
05/27/2020	1020	872	174	City
AVERAGES:	956.00	706.00	188.00	

BOD/TSS:

Surcharge = (Q) {(0.001) (8.34) [0.08162*(706.00-250)] (1.3)}

0.404

COD/TSS:

Surcharge = (Q) {(0.001) (8.34) [0.08162*(956.00-625)] (1.3)}

0.293

- COD is not 2.5 times the BOD; therefore, COD will not be used in the equation.
- BOD is above 250 mg/l and will be included in the surcharge calculation.
- TSS is below 250 mg/l and will not be included in the surcharge calculation.

Pretreatment Charges and Fees - Surcharges

Surcharge =	(Q) {Surcharge Multiplier}			
Surcharge =	(Q) {(0.001) (8.34) [a(BOD-250) + b(TSS-250)] (c)}			
	or			
Surcharge =	(Q) {(0.001) (8.34) [a(COD-625) + b(TSS-250)] (c)}			
Q	Wastewater Flow, Mgal/mo			
0.001	Conversion Factor, Mgal/mo to MMgal/mo			
8.34	Conversion Factor, mg/L to lb/MMgal			
0.08162	a = $/lb BOD or COD Unit Charge			
0.12381	b = $/lb TSS Unit Charge			
1.3	c = CoC Admin Overhead Factor			
COD	Averaged from Sample Testing		625	
BOD	Averaged from Sample Testing		250	
TSS	Averaged from Sample Testing		250	

Date	COD (mg/L)	BOD (mg/L)	TSS (mg/L)	Data
12/19/19	652	55	1,120	City
03/19/2020	552	272	151	City
AVERAGES:	602.00	163.50	635.50	

BOD/TSS:		
Surcharge =	(Q) {(0.001) (8.34) [0.12381*(635.50-250)] (1.3)}	
	0.517	
COD/TSS:		
Surcharge =	(Q) {(0.001) (8.34) [0.12381*(635.50-250)] (1.3)}	
	0.517	

- COD is 2.5 times the BOD but is not greater than 625 mg/l; therefore, COD will not be used in the equation.
- BOD is below 250 mg/l and will not be used in the surcharge calculation.
- TSS is above 250 mg/l and will be included in the surcharge calculation.

Pretreatment Charges and Fees - Surcharges

Q	Wastewater Flow, Mgal/mo	
0.001	Conversion Factor, Mgal/mo to MMgal/mo	
8.34	Conversion Factor, mg/L to lb/MMgal	
0.08162	a = $/lb BOD or COD Unit Charge	
0.12381	b = $/lb TSS Unit Charge	
1.3	c = CoC Admin Overhead Factor	
COD	Averaged from Sample Testing	625
BOD	Averaged from Sample Testing	250
TSS	Averaged from Sample Testing	250

Date	COD (mg/L)	BOD (mg/L)	TSS (mg/L)	Data
12/20/19	74	23	148	City
03/19/2020	2480	763	775	City
AVERAGES:	1277.00	393.00	461.50	

BOD/TSS:

Surcharge = (Q) {(0.001) (8.34) [0.08162*(393.00-250) + 0.12381*(461.50-250)] (1.3)}

0.410

COD/TSS:

Surcharge = (Q) {(0.001) (8.34) [0.08162*(1277.00-625) + 0.12381*(461.50-250)] (1.3)}

0.861

- COD is 2.5 times the BOD and greater than 625 mg/l; therefore, COD will be used in the equation.
- TSS is above 250 mg/l and will be included in the surcharge calculation.

Trinity River Authority
Central Regional Wastewater System
Major Modifications

- New CRWS permit effective April 15, 2020.
- Updates to program required by October 15, 2021.
  - Ordinances
    - Updates to ensure that the ordinances match pretreatment regulations found in 40 CFR Part 403
  - ERP Modifications
    - Update SNC late report timeframe
  - Program Forms
    - Updates to all forms, ensuring that they follow the approved TRA and TCEQ format
  - TBLL Updates
    - The TRA will be developing the new local limits based on sampling conducted at their treatment plant and within their collection system.

Trinity River Authority
Central Regional Wastewater System
Major Modifications

TBLL Updates

- The following local limits will be added:
  - Quaternary Ammonium Compounds (QAC)
  - Tetrapropyl Ammonia Hydroxide (TPAH)
  - Tetramethyl Ammonia Hydroxide (TMAH)
- Following the inhibition issues at the CRWS plant during the 2018-2019 pretreatment year, site specific permit limits were developed until the local limits are updated.

Parameters	Current Limit
TMAH	2.0 mg/L
TPAH	5.5 mg/L
ILQACs	3.0 mg/L
Total Cresols	8.0 mg/L

Trinity River Authority
Central Regional Wastewater System
Major Modifications

Streamlining Updates – Slug Control Plans

- If a Slug Control Plan is required, it must be specific in the SIU's permit.
- SIUs must notify the POTW of any changes at their facility affecting the potential for a slug discharge.
  - Must be report to both the City of Carrollton and TRA
- Slug Control Plans will be evaluated annually

Trinity River Authority
Central Regional Wastewater System
Major Modifications

Streamlining Updates - Significant Noncompliance (SNC)

- Definition has been expanded to include additional types of Pretreatment Standards and Requirements
- 40 CFR 403.8(f)(2)(viii)(H) Any other violation or group of violation, **which may include a violation of Best Management Practices,** which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.
- SNC criteria is now defined for SIUs and IUs
  - Modified criteria will be implemented for IUs

Trinity River Authority
Central Regional Wastewater System
Major Modifications

Streamlining Updates – Best Management Practices (BMPs)

- Permits must contain any BMPs required by a Pretreatment Standard, local limit, state, or local law.
  - TOMPs
  - Slug Control Plans
  - Pollution Prevention Plan
- SIUs **and POTWs** are required to maintain BMP documentation for three (3) years.
- Modifications to clarify reporting requirements:
  - BMR / Permit Application
  - 90 Day Compliance Report
  - Permit Application Renewals
  - SDMR / DMR

Pretreatment Year 2020 – 2021 Milestone Completion Dates

- Laboratory Standardization
  - October 31, 2020
- TRA CRWS Major Modification
  - April 9, 2021
  - September 17, 2021
- Dental One-Time Compliance Report
  - October 12, 2020
- Annual Inspections (will start planning these soon)
  - May 31, 2021
- TRA's Annual Report
  - June 30, 2021
- Multi-Sector General Permit
  - August 14, 2021
- City of Carrollton Website Updates
  - Ongoing

Questions?

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