



**Coordination & Policy Work Group  
Meeting Agenda  
Wednesday, February 28, 2018  
1:00 PM to 3:00 PM**

**Meeting Location:**

Harris County Delta Building  
10555 Northwest Freeway  
Conference Room 213 (2nd floor)  
North Entry (along 290 feeder)

**Call to Order/Welcome/Introductions**

**Review: 9/25/2017 Meeting Summary**

**Planning for the 2018 Annual Report and I-Plan Revisions**

Work group will be given copies the 2017 Report and will discuss the goals for 2018. In addition to drafting a 2018 Annual Report, the BIG and BIG work groups will be considering potential changes to the I-Plan.

**TCEQ Implementation Letter**

Work group will receive an update on the TCEQ implementation letter effort.

**Spring Meeting**

Work group will discuss topics for the Spring meeting.

**Other Topics/Announcements/Adjourn**

**Upcoming Meeting Schedule**

3/20/2018	BIG WWTF and SSS work group (1:00 PM H-GAC)
3/26/2018	BIG Stormwater work group (1:00 PM H-GAC)
6/5/2018	BIG Spring Meeting (1:00 PM – H-GAC)

***Instructions to call into BIG meetings:***

*To call in, dial 713-481-0090 (or 800-240-3895). You will be asked to enter your pass code, followed by the # sign. The pass code is 1084242. If you dial in before H-GAC, you will hear "music on hold". Once H-GAC dials in, the music will cease and the conference call will begin. During the conference, you may hear beeps. A single beep indicates someone has joined the conference call. A double beep indicates someone has left the conference call. Remember--if you do press hold, everyone will hear your hold music.*



**Coordination & Policy Work Group  
Draft Meeting Summary  
Monday, September 25, 2017  
1:30 PM to 3:30 PM  
H-GAC Conference Room A, Second Floor**

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

Linda Broach (TCEQ), Richard Chapin (COH), Hannah Cruce (TX Forest Service), Denise Ehrlich (Gulf Coast Authority), Sarah Gossett (GBF), David Parkhill (SJRA), Jim Robertson (CCFCC), Scott Saenger (Jones and Carter),

### **Review: 3/6/2017 Meeting Summary**

Attendees reviewed the summary and suggested no changes.

### **2017 Annual Report**

Work group was given copies of the draft 2017 Annual Report. Work group reviewed and discussed the draft annual report. Work group made several suggested changes and edits to the document. Of note, it was suggested that impacts and recovery from Hurricane Harvey be included in the document. The group decided that 2018 would be more appropriate as water quality data, DMRs and other information would be readily available and, the 2018 report covers the 2017 calendar year. A note would be placed in the 2017 Executive Summary to state that at the time of publication, Hurricane Harvey impacted the region and that a portion of the 2018 report will analyze data for any discernable impact. The attendees also suggested that the expansion of the BIG project area that now includes the East and West Fork of the San Jacinto River be added as a Success Story.

The group, including absent members, was given till October 6, 2017 to provide any revisions. A corrected version was to be sent out to the BIG on October 13, 2017. The BIG would then be provided two weeks to review and request any changes by October 27, 2017. The draft with any corrections/revisions made, would then be presented to the BIG at the BIG Fall meeting scheduled for October 31, 2017 for final approval.

### **TCEQ Implementation Letter**

Work group reviewed the latest version of the TCEQ implementation letter. Attendees suggested only a few minor changes to the document.

### **Draft Fall Meeting Agenda**

Work group reviewed the draft Fall Meeting Agenda. Attendees had no major comments on the agenda.

### **Announcements/Adjourn**

### **Upcoming Meeting Schedule**

10/31/2017 BIG Fall Meeting (1:00 PM)

# DRAFT

Number	Activity	Assessment Measure	Target	Assessment Support Target	Meet Goal	Suggested Action
1.1	More Rigorous Monitoring	TCEQ Letter, DMR, Permit	Within 5 years, increased monitoring requirements within permit renewals.	Yes	No. TCEQ letter seeks response. Currently not planned. If required then DMR/Permit would be sufficient.	Waiting on response.
1.2	Stricter Limits	DMR, Permit	Within 5 years, all of the WWTF should meet stricter limit.	Yes	No. Clear Creek was not included.	Completed action. Continue to track.
1.3	Increased Compliance and Enforcement	Harris County Compliance	The number of unannounced inspections conducted – The number of focused sampling investigations – The percent of plans and specifications reviewed – The percent of DMIs reviewed – The number of other investigations conducted – The ability of the TCEQ to conduct focused sampling investigations. Every five years, at least 20% of local governments should consider whether to adopt stricter requirements. Note: The I-Plan indicates the revision process should start in year six of implementation.	No	No. Action requires data from TCEQ not currently available. TCEQ letter requests data. Currently TCEQ cannot conduct focused sampling investigations.	Waiting on response.
1.4	Improved Design and Operation Criteria	Harris County Design Express Reviews	WWTFs not meeting effluent limits should upgrade or repair their facilities to comply with individual permits. Over 25 years, WWTFs requiring upgrades in order to meet bacteria limits in their permits will have been upgraded.	No	No. HC reviews and comments based on TCEQ Design Spec. Will local governments consider anything more strict?	Are current TCEQ designee specifications sufficient and is TCEQ's review process sufficient?
1.5	Upgrade Facilities	TCEQ Website - Engineer Plans and Specifications	WWTFs not meeting effluent limits should upgrade or repair their facilities to comply with individual permits. Over 25 years, WWTFs requiring upgrades in order to meet bacteria limits in their permits will have been upgraded.	No	Maybe, with better data. While website notes different upgrades, there is a lack of detail readily available to determine if the upgrade was due to bacteria. Would like need to come from operator/owner. Data at county level.	Survey to determine if WWTFs are upgrading due to poor bacteria performance.
1.6	Consider Regionalization	HC Community Services Department, TCEQ reporting	Regulators should develop criteria for identifying chronically non-compliant WWTFs – Regulators should document the number of non-compliant WWTFs identified using said criteria – Regulators should document the number of chronically non-compliant WWTFs that have considered regionalization	Partially	Maybe, HC provides information on the # of WWTFs that have been merged with other WWTFs, though not always due to non-compliance. EPA/TCEQ have criteria and have identified chronically non-compliant. Not been shared. Permit review has guidelines that permittees should follow to consider regionalizing vs. upgrade/new plant.	Acquire list or adjust action knowing TCEQ/EPA have the list. Track blind number on list over time to determine if list is being addressed.
1.7	Use Treated Effluent for Facility Irrigation	TCEQ Website - Engineer Plans and Specifications	Every five years, one WWTF in the project area shall install a new irrigation system that uses treated effluent.	Yes	Yes, though Plans and Specifications does note the number of submitted plans. It does not provide detail as to specific locations. Data at county level.	Survey location of reuse.
2.1	Develop Utility Asset Management Programs	H-GAC tracks workshops. TCEQ tracks SSOI Initiative	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 WWTF permits will have UAMPs.	Partially	No, not likely to meet the ten year target. H-GAC tracks workshops targeting WWTF operators and options for maintaining collection system. TCEQ maintains list of SSOI participants. No formal list of those with UAMPs.	Survey # UAMPs, SSOIs or some other maintenance plan. #, location and dollars spent to address collection system.

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2.2 Address Fats, Oils and Grease	SSO reporting, Track Education	Compile and share all existing regulations within the project area - Examine each community's regulations and policies - Distribute flyers or other collateral material - Develop and promote website - Within five years, one community shall adopt new regulations	Partially	Maybe, likely a local community has adopted new regulations, but data is not available. Data available to track the number of SSOs. H-GAC is able to track education initiatives. Challenge to track regulations.	Survey to address MS4 outreach efforts and changes to regulations.
2.3 Encourage Appropriate Mechanisms to Maintain Function at Lift Stations	TCEQ Website - Engineer Plans and Specifications, SSO reporting	Every five years, 10% of SSSs shall be compliant with recommendations Within five years, the U.S. Environmental Protection Agency (EPA) and TCEQ will develop appropriate database structure and technology for collecting and sharing information regarding SSOs	Yes	Likely, Data available to track the number of SSOs which reports on the number of lift stations/power failures. Emergency Power requirement latest Ch. 217 revision. Reported lift station upgrades and electric power generation in applications.	Survey location of upgrades.
2.4 Improve Reporting Requirements for Sanitary Sewer Overflows	Electronic Reporting Rule	By year three, H-GMC will work with attorneys for WWTFs, municipal utility districts, and stakeholders to develop model contract language. - Within five years, H-GMC will develop a list of subscriber systems. - As funds are available, H-GMC will initiate a circuit rider program	Yes	Yes, structure has been developed, all MS4 Phase II will be required to report by Dec. 2020.	Completed action. Continue to track.
2.5 Strengthen Controls on Subscriber Systems	Survey	Within five years, the TCEQ will have an appropriate penalty policy in place	Partially	H-GAC reached out to WWTFs and gathered sampled contracts. There is no formal list of subscriber systems and this is not a permit requirement.	Survey to build list, though likely will not be complete. Potentially complete, track future changes.
2.6 Restructure Penalties for Violations	TCEQ	H-GAC will work with the TCEQ, authorized agents, and other interested parties to create an inventory of OSSFs with a focus on identifying known or suspected failing systems - Within one year, H-GMC and local authorized agents will create an initial map. - Within two years, H-GMC and local authorized agents will identify target areas. - Every five years, owners will repair or replace 500 failing OSSFs. - Authorized agents will continue to collect and share OSSF data on an ongoing basis.	Yes	Yes, only missing data for San Jacinto County and Grimes County.	Continue
3.1 Identify and Address Failing Systems	AA data	- Each community will examine its regulations and policies. - Existing regulations will be compiled and shared among Big stakeholders. - Flyers or collateral material will be distributed among Big stakeholders	Yes	Yes, regulations and education are being shared. HC reports addressing systems including some that are likely failing. SEP available to address failing systems.	Continue
3.2 Address Inadequate Maintenance	AA data	- The TCEQ should host biennial meetings to review OSSF regulations. - Local authorized agents will meet annually. - Every five years, one community shall revise or adopt new regulations	Yes	TCEQ reported hosting meetings. OSSF work group meets annually.	Continue
3.3 Legislation and Other Regulatory Actions	AA data, TCEQ communication				
4.1 Continue Existing Programs					
4.2 Model Best Practices					

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Encourage Expansion of Stormwater Management Activities					
Promote Recognition Program for Developments					
4.5 Provide a Circuit Rider Program					
Petition TCEQ to Facilitate Reimbursement of Bacteria					
4.6 Reduction Measures					
Increase Compliance with and Enforcement of Storm Water Management Permits					
Detect and Eliminate Illicit Discharges					
6.1 Discharges					
Improve Regulation and Enforcement of Illicit Discharges					
6.2 Enforcement of Illicit Discharges					
Monitor and Control Waste					
6.3 Hauler Activities					
Promote Increased Participation in Existing Programs for Erosion Control, Nutrient Reduction, and Livestock Management					
7.1 Livestock Management					
Promote the Management of Feral Hog Populations					
7.2 Feral Hog Populations					
Expand Homeowner Education Efforts Throughout the BIG Project Area					
8.1 Project Area					
Continue to Utilize Ambient Water Quality Monitoring and Data Analysis					
9.1 Data Analysis					
Conduct and Coordinate Non-Ambient Water Quality Monitoring					
9.2 Monitoring					
Create and Maintain a Regional Implementation Activity Database					
9.3 Database					
Assess Monitoring Results and Modify I-Plan					
9.4 Modify I-Plan					
Evaluate the Effectiveness of Storm Water Implementation Activities					
10.1 Activities					
Further Evaluate Bacteria Persistence and Regrowth					
10.2 Persistence and Regrowth					
Determine Appropriate Indicators					
10.3 Indicators					
10.4 Additional Research Topics					

DRAFT

11.1	Consider recommended criteria when selecting geographic locations for projects					
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November 7, 2017

Mr. Chris Loft, Program Lead  
Total Maximum Daily Load Program  
Texas Commission on Environmental Quality  
MC-203  
P.O. Box 13087  
Austin, TX 78711-3087

Subject: TCEQ Implementation of the Implementation Plan for Seventy-Two Total Maximum Daily Loads for Bacteria in the Houston-Galveston Region (I-Plan).

Dear Mr. Loft,

The Houston-Galveston Area Council, on behalf of the Bacteria Implementation Group (BIG), is writing this letter to request information from the TCEQ in support of actions taken to implement the I-Plan. The BIG notes appreciatively that staff at TCEQ's Region 12 Office have contributed greatly toward documenting TCEQ's implementation efforts and assisting development of the annual reports.

The BIG created the I-Plan to address bacteria impairments and improve water quality in the region. The I-Plan was approved by the Commission on January 30, 2013. A copy of the I-Plan can be found at: <http://www.h-gac.com/community/water/tmdl/BIG/reports.aspx>. As part of the I-Plan, stakeholders are required to draft an annual report that:

- chronicles partner projects carried out during the year which implement plan actions
- highlights successful projects
- documents water quality environmental improvement resulting from stakeholder efforts.

A copy of the most recent annual report can be found at: <http://www.h-gac.com/community/water/tmdl/BIG/reports.aspx>.

The BIG requests TCEQ provide the current status of the I-Plan strategies that directly reference TCEQ, and any data that can assist tracking other I-Plan areas where TCEQ might have additional information. Enclosed with this letter is a list of I-Plan actions that specifically reference TCEQ and for which the BIG lacks information.

The BIG respectfully requests a written response within the next thirty (30) days which outlines the steps TCEQ has taken or plans to take to address these I-Plan activities. Thank you for the opportunity to work together on improving water quality in the greater Houston area. Please contact me, should you need any additional information or have any questions, at [todd.running@h-gac.com](mailto:todd.running@h-gac.com) or 713.993.4549.

Sincerely,

Todd Running  
Manager  
Community and Environmental Planning  
Houston-Galveston Area Council

Cc: Members of the BIG  
Jason Leifester  
Lauren Oertel

Enclosure



## BIG I-PLAN STRATEGIES REFERENCING TCEQ

The BIG is specifically interested in receiving an update on the following TCEQ initiatives:

- **I-Plan Activity 1.1: Impose More Rigorous Bacteria Monitoring Requirements.** The BIG proposed in the I-Plan monitoring at wastewater treatment facilities (WWTFs) at greater frequency than current state permit requirements. The BIG has found since the approval of the I-Plan that the increased monitoring frequency at larger permitted flow WWTFs has helped improve plant function.

*The BIG requests that TCEQ increase the monitoring frequency at the smaller permitted flow WWTFs (<10 MGD) within the BIG project area.*

- **I-Plan Activity 1.3: Increase Compliance and Enforcement by the TCEQ.** Activity 1.3 on page 54, Increase Compliance and Enforcement recommends increasing 'no notice' inspections, allowing TCEQ to utilize focused sampling investigations, and to increase staffing if necessary. The Regional Office has reported that TCEQ has not approved focused sampling investigation.

*The BIG requests any information on implementation efforts or data that addresses increased compliance and enforcement by the TCEQ.*

- **I-Plan Activity 2.5: Strengthen Controls on Subscriber Systems.** Activity 2.5 found on page 62 recommends identifying subscriber systems and recommends the TCEQ consider rulemaking to require registration of subscriber systems. Sanitary sewer overflows have been identified as a contributor to the bacteria concentrations in the project area.

*The BIG requests any information on implementation efforts or data that strengthens controls on subscriber systems.*

- **I-Plan Activity 4.6: Petition the TCEQ to Facilitate Reimbursement of Bacteria Reduction Measures.** Activity 4.6 on page 75, directs the BIG to petition TCEQ to secure letters of commitment from TCEQ that describe the development policies and criteria that facilitate reimbursement for bacteria reduction measures.

The BIG is concerned that the lack of a specific policy to facilitate MUD reimbursement to developers providing stormwater quality structures (i.e. Low Impact Development, Green Infrastructure) creates funding uncertainty and inhibits their broader use due to the risk-adverse development process.

*The BIG requests the TCEQ release a guidance document that includes criteria that will assist in determining the eligibility of a stormwater quality feature for reimbursement.*

