

**CITY OF SAN ANTONIO
INTERDEPARTMENTAL MEMORANDUM**

SAN ANTONIO WATER SYSTEM

TO: Mayor and City Council

FROM: Leonard D. Young, P.E., Interim President/Chief Executive Officer, San Antonio Water System, and Thomas G. Wendorf, P.E., Director of Public Works, City of San Antonio

THROUGH: Terry M. Brechtel, City Manager

COPIES: Melissa Byrne Vossmer, Assistant City Manager, and File

SUBJECT: Ordinance Approving Amendments to Modify the San Antonio Water System's Industrial Wastewater Pretreatment Program and Liquid Waste Transportation and Disposal Regulations.

DATE: July 22, 2004

SUMMARY AND RECOMMENDATIONS

This Ordinance (1) amends Chapter 34 of the City, modifying local regulations to implement the San Antonio Water System's (SAWS) Pretreatment Program, and (2) further amends provisions of Chapter 34, making appropriate administrative changes to Liquid Waste Transportation and Disposal Regulations.

By resolution, the SAWS board of Trustees has reviewed and approved these modifications and recommends amendment of the City Code, Chapter 34, Water and Sewers, accordingly.

BACKGROUND INFORMATION

- The Industrial Wastewater Pretreatment Program is a federally mandated system of protocols, pollutant limits, and regulations intended to control the types and concentrations of pollutants discharged by commercial and industrial sources into the SAWS sanitary sewer system. The controls are intended to protect the operational integrity of the wastewater treatment plants (POTWs). Without such controls, excessive concentrations of pollutants, corrosives, toxins, etc., could interfere with SAWS' sewage treatment and possibly result in damage to the system and /or wastewater treatment plants as well as create a hazardous working environment for SAWS personnel working in or around the collection system.

- The Pretreatment amendments proposed here are adjustments to the limits (concentrations) of various pollutants received by the treatment plants. Under state and federal regulations, such concentrations must be periodically reviewed and adjusted as necessary. The Ordinance at hand is a response to the periodic review schedule, updating pollutant loading limits for SAWS' sanitary sewer collection and treatment facilities.
- The Resource Compliance Division of the San Antonio Water System (SAWS) has received Texas Commission on Environmental Quality (TCEQ) approval of certain modifications to the Pretreatment Program
- A statement of endorsement or approval of the Pretreatment Program from the SAWS Board of Trustees and San Antonio City Council must be included in the Program documents on file with TCEQ pursuant to 40 CFR §403.9 (b) (2).
- TCEQ and the United States Environmental Protection Agency (EPA) require local limits reevaluation and program modification (as necessary) or at least every five years.
- SAWS Board of Trustees is responsible for funding the Pretreatment Program, as modified and approved by TCEQ and that said funding of the operations of the required Pretreatment Program is supported by the general fund of the SAWS as part of the Resource Protection and Compliance Department annual operating budget with no additional funding required.
- The SAWS Board of Trustees approved the proposed modifications to the current Pretreatment Program in an open meeting of the Board on September 16, 2003.
- In addition to amendments needed to update the Pretreatment Program, this Ordinance includes changes to provisions of Liquid Waste Transportation and Disposal Regulations. These changes update nomenclature, appropriately naming and identifying regulatory agencies and responsible personnel.

POLICY ANALYSIS

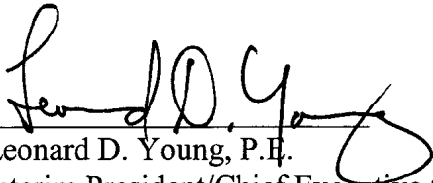
The requested action is in accordance with the City of San Antonio's and San Antonio Water System's policy of environmental responsibility and the development and implementation of the appropriate regulations to maintain wastewater pretreatment and treatment effectiveness. The requested action is also required by and in accordance with the requirements of the City's NPDES (National Pollutant Discharge Elimination System) permits.

FISCAL IMPACT

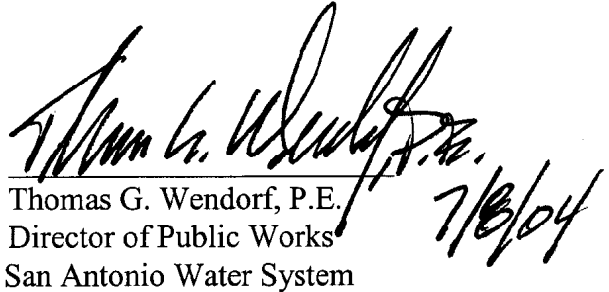
There will be no financial impact to either the San Antonio Water System or the City of San Antonio. All expenses related to the operation of the approved established Pretreatment Program are included in the normal operating budget of the Resource Compliance Division of the SAWS' Resource Protection and Compliance Department.

SUPPLEMENTARY COMMENTS

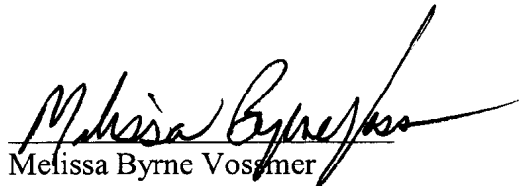
This ordinance will provide the necessary changes to the San Antonio Water System Pretreatment Program and will allow the City and SAWS to remain compliant with NPDES permit requirements. SAWS staff has worked with representatives of the San Antonio Manufacturers' Association and other interested entities in developing the program changes as required by the Texas Commission on Environmental Quality (TCEQ) and the United States Environmental Protection Agency (EPA).



Leonard D. Young, P.E.
Interim President/Chief Executive Officer
San Antonio Water System



7/16/04

Thomas G. Wendorf, P.E.
Director of Public Works
San Antonio Water System



Melissa Byrne Vosmer
Assistant City Manager
City Manager

Approved:


Terry M. Brechtel
City Manager