



City of San Antonio

Agenda Memorandum

File Number:21-2462

Agenda Item Number: 16.

Agenda Date: 4/29/2021

In Control: City Council A Session

DEPARTMENT: Public Works

DEPARTMENT HEAD: Razi Hosseini, P.E., R.P.L.S.

COUNCIL DISTRICTS IMPACTED: Citywide

SUBJECT:

City Code Amendment: Modifications to Chapter 34 (Water and Sewers)

SUMMARY:

Public Works requests, on behalf of the San Antonio Water System (SAWS), City Council's approval of an ordinance adopting amendments to Chapter 34, Article V, Division 3 of the City Code. These amendments to SAWS' industrial wastewater pretreatment program are required to meet new federal and state requirements, modify and streamline program processes and clarify existing wording for regulatory purposes.

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 sanitary sewer system. The program is intended to protect the operational integrity of the wastewater treatment plants and without its regulations, excessive concentrations of pollutants, corrosives and toxins could interfere with sewage treatment.

Chapter 34, Article V, Division 3 of the City Code describes SAWS' pretreatment program which seeks to reduce or eliminate the discharge of harmful pollutants into the sanitary sewer system by permitted discharges. The proposed ordinance amends this section of the city code to comply with federal and state requirements.

ISSUE:

Chapter 34 of the City Code is required to be amended to meet new Federal and State requirements, modify and streamline program processes and clarify existing wording for regulatory purposes.

The SAWS Board of Trustees approved resolution No. 2021-047 on February 2, 2021, approving modifications to the SAWS' pretreatment program to include the required updates to existing regulations and requirements. The proposed changes are summarized below.

Chapter 34, Article V, Division 3 (Industrial Waste)

- Update references to include additional ordinances
- Update abbreviations (e.g., IU- industrial user)
- Update verbiage and definitions (e.g., authorized representative of an industrial user)
- Require users in specific cases to submit documentation on pretreatment standard sampling to SAWS to determine compliance
- Revise baseline monitoring report requirements to include the time, date and place of sampling, method of analysis and certification of sampling and analysis
- Require significant industrial users submit a report on discharge pollutants limited by pretreatment standards
- Change the timeline to submit a repeated sampling and analysis to SAWS following a violation from forty-five (45) days to thirty (30) days
- Update sample collection requirements to include preservation and compositing techniques
- Require sampling collection techniques be documented in the industrial user discharge permit
- Require total residual chlorine be included in sample monitoring
- Require prior notification and approval by SAWS for changes to permitted sampling locations
- Require a minimum of four grab samples for new industrial users
- Emphasize the importance of reporting information as soon as possible to determine compliance

These amendments to Chapter 34 of the City Code will ensure compliance with state and federal regulations. Additionally, the requested action is in accordance with the City's and SAWS's policy of environmental responsibility and the development and implementation of the appropriate regulations to maintain wastewater pretreatment and treatment effectiveness.

ALTERNATIVES:

City Council could choose not to approve these city code amendments; however, the SAWS pretreatment program would not comply with federal and state regulations. Violation of these regulations could result in a state administrative order and/or penalties. These could affect the City's compliance history and future permitting.

FISCAL IMPACT:

Approval of this ordinance has no fiscal impact on the City of San Antonio and there are no fee increases associated with this ordinance. All expenses related to the operation of the established pretreatment program are included in the operating budget of the Resource Compliance Division of the SAWS Resource Protection and Compliance Department.

RECOMMENDATION:

Staff recommends approval of this ordinance to modify Chapter 34, Article V, Division 3.