



## AGENDA MEMORANDUM

First Reading for the City Council Meeting of January 18, 2024  
Second Reading for the City Council Meeting of January 30, 2024

**DATE:** January 18, 2024

**TO:** Peter Zaroni, City Manager

**FROM:** Drew Molly, Chief Operating Officer, CCW  
[DrewM@cctexas.com](mailto:DrewM@cctexas.com)  
(361) 826-1853

Nicholas Winkelmann, P.E., Interim Director, CCW  
[NickW@cctexas.com](mailto:NickW@cctexas.com)  
361-826-1796

**Ordinance amending the City's wastewater pretreatment program for updates to the  
Technically Based Local Limits as required by the Texas Commission on  
Environmental Quality**

**CAPTION:**

Ordinance amending the City Code relating to the Technically Based Local Limits for discharge of wastewater into the City's wastewater treatment plants in accordance with Texas Commission on Environmental Quality regulations and providing for penalties in accordance with City Code.

**SUMMARY:**

The amendment to the Ordinance will update the Technically Based Local Limits (TBLLs) of the City's wastewater treatment program. The TBLLs are required by the Texas Commission on Environmental Quality (TCEQ) as part of the City's wastewater discharge permits.

**BACKGROUND AND FINDINGS:**

The Clean Water Act was established by Congress in 1972 and provides the Environmental Protection Agency (EPA) the authority to implement pollution control programs. The Clean Water Act requires the City to maintain a wastewater pretreatment program which is monitored and audited by TCEQ.

The program is designed to protect both the environment and the City's infrastructure from industrial discharges into the wastewater system. This is done by the enforcement of TBLLs for numerous pollutants such as arsenic, cyanide, lead, mercury, and others. TBLLs are a required part of the pretreatment program. TBLLs are developed by determining wastewater plant efficiency, history of compliance, and specific conditions of the body of water receiving the discharged effluent. TBLLs must protect the integrity of the receiving wastewater treatment plants (WWTPs) as well as the bays, creeks, and streams which receive the effluent waters. The receiving bodies of water for each of the City's six WWTPs are identified in each facility's specific

permit.

As part of the City's discharge permit renewal process, TCEQ has requirements related to the wastewater pretreatment program and the TBLLs. Each of the City's six WWTPs have a specific permit and each of the five permits have a respective duration of five years. The City's current Ordinance has concentration-based limits that apply to all industries that discharge their wastewater into a wastewater system within City limits. TCEQ has required the City to redevelop and re-submit its current TBLL calculations to TCEQ for review. The TBLL redevelopment is based upon the review of current data and a detailed analysis that was conducted by the City's consulting engineer, Plummer Associates, Inc. The analysis was submitted to TCEQ, and approval of the analysis was provided by TCEQ in November 2023.

During the redevelopment process, samples were taken at three different points: the influent of the wastewater plant, the effluent of the wastewater plant, and at selected points in the wastewater collection system. The sample data was then used to establish criteria for each wastewater plant to ensure the appropriate operational parameters are achieved. These parameters primarily consist of water quality of the receiving water, sludge quality, and any factors that may affect the biological processes of the plant.

TCEQ has determined that the modifications are technically complete, and the TCEQ agrees with the City of Corpus Christi on the proposed TBLLs for the Allison and Greenwood WWTPs (the proposed TBLLs for the Allison and Greenwood WWTPs are shown in the table below). These limits will be identified and referenced in Chapter 55 (Sections 55-141 and 55-163) of the City Code, which applies to pollutant generators and transporters. The operation of the WWTPs remains the same but the limits have been adjusted to fall within the developed parameters of the analysis and TCEQ recommendations. Industrial users are required to self-monitor and report the results, in addition to the sampling that is conducted by CCW.

Pollutant of Concern	TBLLs Proposed by the City and Accepted by the TCEQ (mg/L)
	Allison & Greenwood WWTPs
Arsenic	0.634
Cadmium	0.134
Chromium, (T)	2.98
Copper	0.630
Cyanide, (T)	0.130
Lead	0.5118
Mercury	0.0036
Nickel	0.590
Phenol	126.34
Silver	0.170
Zinc	1.48

TCEQ notified CCW in early January 2024 that the newly calculated limits are approved and

required to be put in place through the City Council amending the existing Ordinances. TCEQ has requested that the Ordinance approval be completed by February 13, 2024.

CCW has notified its local industrial water users about this process with TCEQ. Upon City Council approval of this item, CCW will issue official City correspondence to each industrial water user of the new TBLLs that have been reviewed and approved by TCEQ. which is how they will be enforced. The local industrial users will be required to self-monitor and provide their results to CCW on a quarterly basis. CCW also does, and will continue to do, its own wastewater sampling along with the reviews of each industrial water user's self-reported results.

**ALTERNATIVES:**

The alternative is to not approve the proposed Ordinance amendment; however, this would be in violation of TCEQ requirements which would jeopardize the City's TCEQ-approved pretreatment program as well as the City's Wastewater Discharge permits.

**FISCAL IMPACT:**

N/A

**Funding Detail:**

N/A

**RECOMMENDATION:**

Staff recommends amending the Ordinance, as presented.

**LIST OF SUPPORTING DOCUMENTS:**

Ordinance