

Wastewater Systems Regionalization – What You Need to Know

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Introduction

- Owners and operators of wastewater systems face an ever-increasing demand on their resources to stay in compliance with federal and state regulations.
- Regionalization promotes an affordable, long-term solution to wastewater management by consolidating wastewater collection, treatment, and disposal into larger service providers for areas or regions.
- Regionalization involves consolidation of wastewater systems when a public or private entity provides wastewater service by means of physically connecting new systems to existing ones.
- The TCEQ strongly encourages owners or operators of proposed new domestic wastewater systems to be proactive by giving serious consideration to joining or connecting to a sound neighboring system.



Statutory and Regulatory Authority for Regionalization



- Texas Water Code (TWC) Section 15.001(13) defines Regionalization as the "development of a water supply or wastewater collection and treatment system that incorporates multiple service areas into an areawide service facility or any such system that serves an area that includes more than a single county, city, special district, or other political subdivision of the state."
- TWC Sections 26.081 through 26.087 provides Texas' regionalization policy for wastewater treatment. It states that TCEQ is to implement a policy to "encourage and promote the development and use of regional and area-wide waste collection, treatment, and disposal systems to serve the waste disposal needs of the citizens of the state and to prevent pollution and maintain and enhance the quality of the water in the state."



Statutory and Regulatory Authority for Regionalization (cont.)

• TWC Section 26.0282 authorizes TCEQ, when considering issuing a permit to discharge waste, to deny or alter the terms and conditions of a proposed permit based on need and the availability of existing or proposed area-wide or regional waste collection, treatment, and disposal systems.



Does Regionalization apply to me?



- If you are considering building a new wastewater treatment plant and are applying for a new TPDES permit, Regionalization applies to you.
- Entities regulated by the TCEQ, including owners/operators of proposed new wastewater systems, should consider connecting to an existing permitted domestic wastewater system or demonstrate that doing so is not feasible.
- You must determine if regionalization is possible before submitting a new permit application to TCEQ.





Benefits of Regionalization

- Typically, existing systems with sufficient treatment capacity can offer wastewater treatment and disposal at a lower cost than constructing, operating, and maintaining a stand-alone system.
- Regional systems can distribute costs for capital improvement projects, like upgrades and repairs, over a larger customer base.
- Existing WWTPs certified by the Texas Commission on Environmental Quality (TCEQ) as regional providers may also be eligible for tax exemption on sponsored equipment, services, or supplies used solely to construct or operate a wastewater system or component of a system.

(https://www.tceq.texas.gov/waterdistricts/regional-provider-certification)



Roles in Evaluating Regionalization

- Role of the New Wastewater Systems
 - If you plan to build a new WWTP system, an important part of the planning process includes evaluating the possibility of regionalization (i.e., connecting the new or proposed system to an existing system) versus building a stand-alone system.
- Role of the Existing Wastewater Systems
 - Existing WWTPs should have accessible information on how they can be contacted
 for purposes of seeking connection to their system and must provide prompt
 responses to requests for service. They should also encourage regionalization by
 treating all applicants fairly, charging reasonable application fees, and charging costbased fees for providing wastewater service to those requesting service.
- Role of TCEQ



Where do I Start?

- Perform a search and identify all existing and constructed permitted domestic wastewater treatment facilities or sanitary sewer collection systems within a three-mile radius of your proposed facility.
- You must also identify if any portion of the service area is within another utility's sewer CCN area.

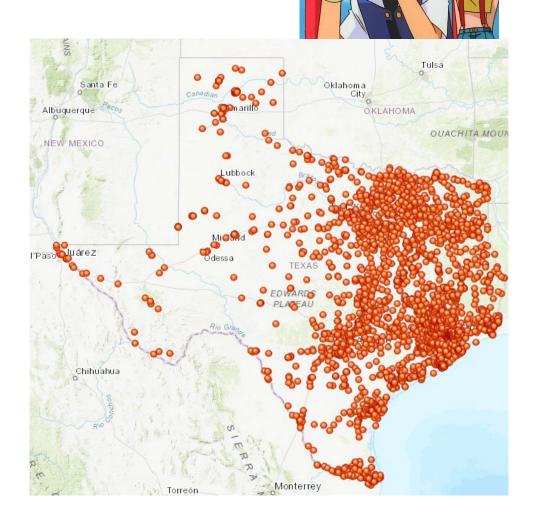


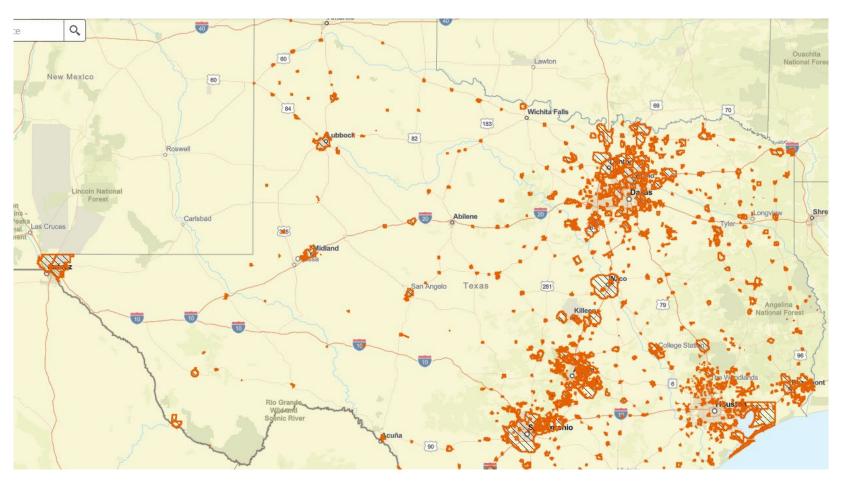


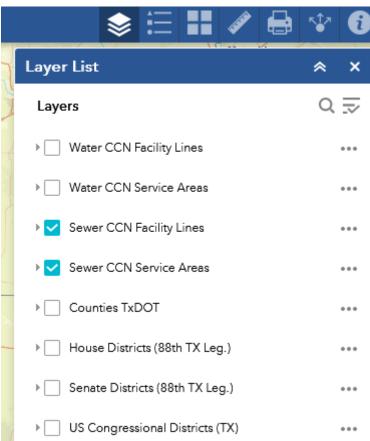
Table 1. Online resources for identifying and locating nearby wastewater systems.

Provided by	Online Resource	Available Information
PUC	CCN Map Viewer	Find the wastewater service provider for a specific address or property.
TCEQ	Wastewater Outfall Map Viewer (Updated Link)	Find the outfall locations of nearby wastewater treatment plants. Clicking on an outfall reveals the name of the permittee as well as an abbreviated version of the permit number.
Counties and Cities	Subdivision plats / property information	Access subdivision plat maps. Information available varies by city/county.



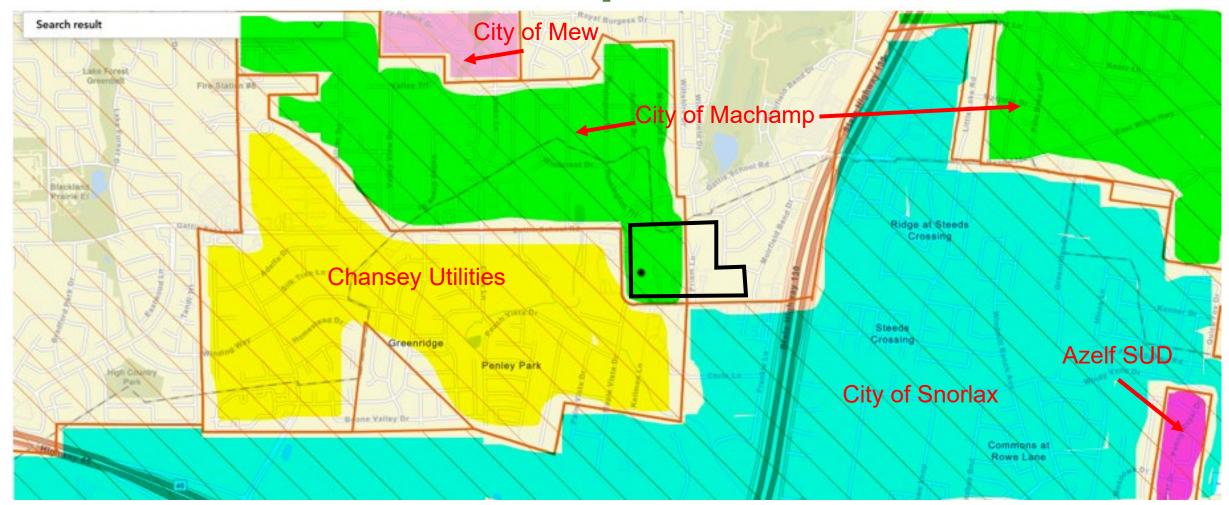
CCN Map Viewer







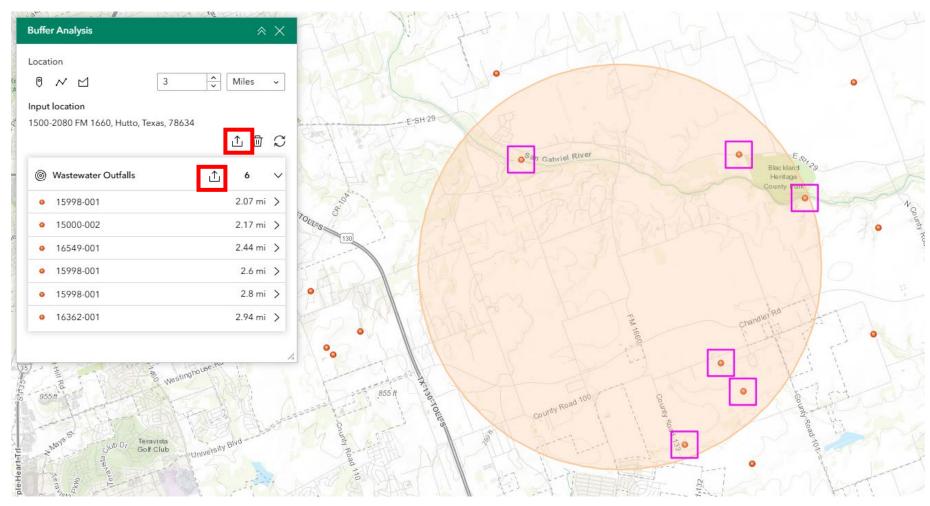
CCN Map Viewer





Wastewater Outfall Map Viewer

- The new ArcGIS map now lets you see the results within the 3 miles radius for ease.
- You can also export the results.





Requests for Service

- If your proposed facility is within a three-mile radius of any existing and constructed permitted domestic wastewater system or a portion of your service area is within another utility's sewer CCN area, you must request service from the existing permitted system owner or operator.
- Your request for service must include your proposed facility's capacity, an inquiry for the total cost assessment of connecting to their sewer system and providing sewer services, as well as any additional conditions for receiving service.
- These requests should be mailed via certified mail for effective response documentation.



Requests for Service (cont.)

 Request for Service Letter Example



Lone Star Wastewater Treatment Plant

10000 Heart of Texas Drive

Townville, Texas 70000

Subject: New Place WWTP Application for New Permit

Dear TCEQ Wastewater Discharge Permit Holder:

The New Place WWTP is preparing an application for a new Texas Pollutant Discharge Elimination System (TPDES) wastewater discharge permit. The facility will serve the proposed New Place residential subdivision consisting of approximately 200 single-family connections. The proposed service area and New Place WWTP locations are provided on the enclosed map. We are in the process of applying for an authorized flow of 0.15 million gallons per day (MGD) and plan to begin construction by January 2019 with wastewater service needing to commence by November 2019.

We are required to contact all existing TPDES permittees within a three-mile radius of the proposed New Place WWTP location to request service. Do you have the capacity and are you willing to provide service for the requested 0.15 MGD? If you do not have the current capacity, but are willing to expand your facility to provide service, will you be able to provide service within the needed time frame? If you are willing to provide service, please provide the estimated costs and service rates in a written response.

Please provide a response indicating if 0.15 MGD of wastewater treatment capacity in your facility is available and, if so, under what terms. A written reply on a copy of this letter will be adequate. You may email your response to Jane.Doe@newplace.com. Please feel free to call me at 555-555-0000.

Sincerely,	
Jane Doe	
Date of Reply:	
Is capacity available to accommodate 0.15 MGD?	
If existing facilities are not adequate, is an expansion feasible?	
If yes to either question, please provide in writing the terms for service.	
Name and Title:	
Signature:Date:	



Conduct a Financial, Managerial, and Technical Analysis

- If a request for service was approved, you are encouraged to evaluate the financial, technical, and managerial aspects of regionalization.
- Financial:
 - Evaluation of the cost-benefit analysis of regionalization compared to the construction, maintenance, and operation of your stand-alone system.
 - Affordability of rates proposed by a regional or area-wide system compared to the projected rates of your stand-alone system.
 - Other financial factors specific to your case (i.e., projected development schedule, costs of obtaining easements, etc.)



Conduct a Financial, Managerial, and Technical Analysis (cont.)

Technical:

- Feasibility of connecting with another collection system.
- Feasibility of obtaining easements (e.g., collection system is across a waterbody, another utility's CCN area must be crossed, etc.)
- The existing facility's capacity to accommodate the projected increase in flow from your development.

Managerial:

- The existing facility's compliance history is in good standing.
- The operation and maintenance of the existing facility is dependable.



Justification of Permit

- Provide a justification for the proposed flows.
- Provide an anticipated construction start date and operation schedule for each phase being proposed.
- If construction is dependent upon housing or commercial development, provide information from the developer such as the size of the development (number of lots), the date construction on the development is scheduled to begin, and the anticipated growth rate of the development (number of houses per month or year).



Justification of Permit (cont.)

- Attach population estimates or projections used to derive the flow estimates and anticipated growth rates for developments.
- Provide the source and basis upon which population figures were derived (census or other methodology).
- Provide population projections at the end of the design life of the treatment facility and the source and basis upon which population figures were derived.



