

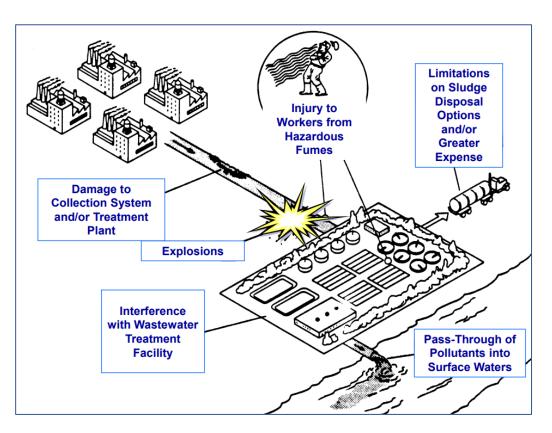
## Agenda

- Goals and Objectives
- Sewer Use Ordinance
- Collection System Sampling
- Odor and Corrosion Control
- Consent Order
- Next Steps

## SEWER USE ORDINANCE

## Background

### National Pretreatment Program Objectives – 40 CFR § 403.2



- Prevent introduction of pollutants that interfere with operation of Wastewater Treatment Plant (WWTP)
  - Sanitary Sewer Stoppages / Overflows
  - Exposure to pollutants result in causing harm to workers and / or the public
  - WWTP Upsets
- Prevent introduction of pollutants that pass through the WWTP
  - Results in a violation of the WWTP Discharge Permit (NPDES)
- Improve opportunities to reuse wastewater and biosolids

### **EPA Pretreatment Program Requirements**

- WWTP Design Flows greater than 5 Million Gallons per Day (MGD)
  - Potential to receive pollutants from industrial users that result in pass through or interference
  - Significant Industrial Users (SIU) that are identified by EPA as Categorical Industrial Users\*
- WWTP Design Flow Less than 5 MGD
  - If KDHE or EPA determines a program is required to prevent pass through or interference
  - Has SIU contribution or chronic NPDES violations due to non-domestic dischargers

\* KDHE assumes responsibility of regulating Categorical SIUS in non-pretreatment cities.

Semi-Conductor manufactures are classified as a Categorial SIU – 40 CFR Part 469 –Electrical and Electronic Components

# Approved Pretreatment Program Components: 40 CFR § 403.8 (f)

- 1. Sewer Use Ordinance procedures to protect WWTP from pollutants that cause interference or pass-through
- 2. Industrial Waste Survey mechanism to identify Significant Industrial Users (SIU) in service area
- 3. Develop and Monitor technically based local limits
- 4. Legal Authority
- 5. Enforcement Response Plan (ERP)
- 6. Funding Mechanism in place to finance pretreatment program implementation
- Bel Aire to complete first 2 components for non-program City.

# Recommended Regulatory Standards For "Non-pretreatment City"

ITEM	PURPOSE
General Provisions	Purpose and Policy of the SUO
Definitions	Defines terms and phrases in the SUO
Wastewater Discharge Prohibitions	Applicable to commercial and industrial facilities (collectively referred to as Industrial Users: IUs)
Right of Entry	Establishes ability to inspect nondomestic sources and collect wastewater samples
Industrial Waste Surveys	Authority to gather information used to characterize IU contributions
<ul> <li>Additional Considerations:         <ul> <li>Implementation Procedures</li> <li>EPA Streamlining Initiatives</li> <li>Notification, Reporting and Recordkeeping</li> <li>Enforcement</li> <li>Trucked, Hauled, RV Waste Controls in the service area</li> </ul> </li> </ul>	Provides the ability to address discharge or regulatory requirements unique to the City

## **Industrial Waste Surveys**

- Compiles a list of IUs contributing pollutants that potentially have an adverse impact of the WWTP and/or collection system
  - Reduction in WWTP efficiencies
  - Damage to WWTP or collection system
  - Causes NPDES Permit violation
  - Fish Kill
- Re-evaluate any current Permitted IUs
- Communicate with business community any applicable pretreatment requirements



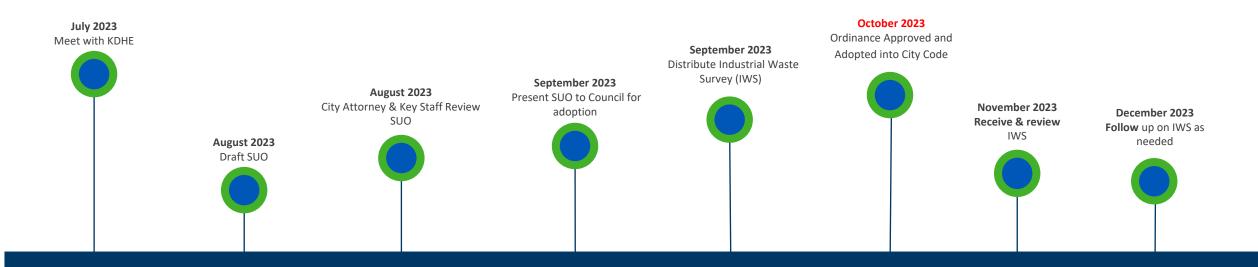
## **Bel Aire Program Goals**

 Develop mechanism to control discharges from non-domestic sources in the form of a Sewer Use Ordinance which establishes that authority

Meet City's responsibilities for pretreatment under Consent Order

Measure and Document Bel Aire sewer use contributions to CCUA

## Sewer Use Ordinance (SUO) Schedule



#### Key Assumptions:

- Does not require EPA review and approval
- Use of standard Sewer Use Ordinance template recommended by KDHE
- City Attorney and Staff Review is 4 weeks
- Council Approval and Adoption into Code is 4 weeks
- Establishes the basic framework to protect the Wastewater Treatment Plant and its workers against impacts from pollutants of non-domestic wastewater to assure compliance with all NPDES Permit requirements

## Long-Term Program Management

- A plan for long-term sewer use program management will set the City up for success
  - Economic Development Support
  - Continuous Industrial Waste Survey Procedures
  - Other Considerations
    - Hauled Waste
    - Restaurants



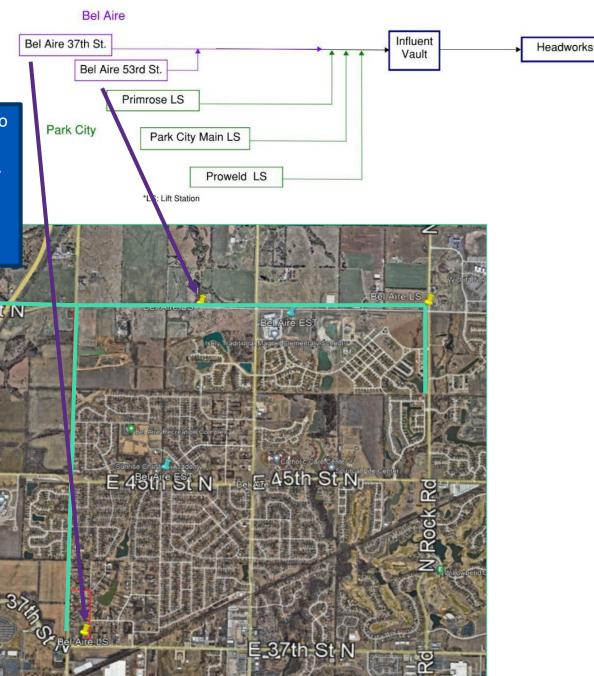
## **Collection System Sampling & Support**

## **Sampling Locations**

- Proposed locations collect majority of wastewater from Bel Aire prior to introduction of wastewater from Park City
- Major Lift Stations selected due to available power and fenced security

E 45th St N

Flow Monitoring available at both sites (37<sup>th</sup> Street flow monitor currently out of service)



## Sampling Activities



Autosampler on order for Harding Lift Station monitoring. Wastewater is currently collected by using a portable autosampler borrowed from the City of Wichita.



New Autosampler at 53<sup>rd</sup> Street N Lift Station

## **Odor & Corrosion Control**

### Areas of Odor and Corrosion Detected

- Odor Complaints from residents near the 53<sup>rd</sup> St.
   Lift Station (LS)
   53<sup>rd</sup> Street N Substantial grease build-up in LS wetwell
- Significant corrosion of manhole vaults and lids on sanitary sewer line serving 53<sup>rd</sup> St N LS
- Odors and corrosion result of excess hydrogen sulfide (H<sub>2</sub>S) present in the sewage likely due to extended mean residence time of wastewater in the collection system







## **KDHE Consent Order**

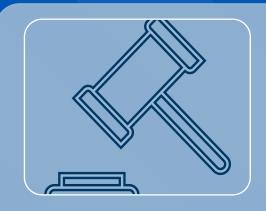
### Consent Order Objectives

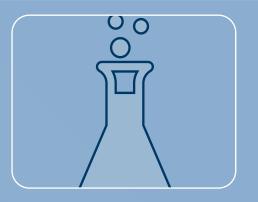
The Chisholm Creek Utility Authority entered into a Consent Order with KDHE in November 2022. The Consent Order includes the following directives:

- Submit Expansion Project Plan for CCUA WWTP October 31, 2023 (Original date of May 31, 2023 extension granted by KDHE at request of CCUA)
- Complete Expansion Construction Project September 30, 2025
- Submit Quarterly Progress reports describing progress made on expansion project and/or maintaining interim Permit Compliance

Burns & McDonnell shall assist the City in developing and reviewing KDHE correspondence applicable to the Consent Order

## NEXT STEPS







Sewer Use Ordinance Development and Approval

Sampling Program Assistance Odor and Corrosion Control Assistance



CREATE AMAZING.

