**Texas Association of Clean Water Agencies (TACWA)** 

## **BREAKING NEWS**



## PLUMMER

TCEQ DECLARES TDS A SOURCE SUBJECT FOR DISCHARGERS; SAWS RESPONDS WITH A SALTY SOLUTION

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## TCEQ DECLARES TDS A SOURCE SUBJECT FOR DISCHARGERS

The permittee shall conduct a TDS and chloride source identification and reduction study. Within 180 days of permit issuance, the permittee shall submit a TDS and chloride source identification and reduction study work plan to the TCEQ Compliance Monitoring Team (MC-224) and cc the Standards Implementation Team (MC 150). The TCEQ may disapprove or modify the work plan within 60 days of receipt, with no response being equivalent to approval. The work plan shall include identification of influent TDS and chloride sources, control options, (e.g. BMPs, pretreatment requirements), effluent sampling at a minimum frequency of once per week, reduction goals, and annual progress reporting. Sampling shall be conducted during periods representative of typical influent TDS and chloride concentrations. The duration of the study shall be 3 years from the date of implementation and annual progress reports shall be submitted by December 31st of each year to the TCEQ Compliance Monitoring Team (MC-224) and cc the Standards Implementation Team (MC 150).

TCEQ, June 2020

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TCEQ, June 2020

## THE USUAL SUSPECTS ARE ROUNDED UP



## **AWS RESPONDS WITH A SALTY SOLUTION**



Meet SMC WRC TPDES Permit Requirement.



Understand TDS and chloride sources.

Identify contribution by category/user:

- Water supply Commercial
- Industrial
- Residential



Oetermine TDS and chloride concentrations upstream and downstream of WRC outfalls.

Predict future TDS and chloride concentrations.

Identify control options.

## **SAWS RESPONDS WITH A SALTY SOLUTION**



## **SAWS RESPONDS WITH A SALTY SOLUTION**

#### **Sample Location Selection**

- Coordinate with SAWS Staff
- Desktop analysis
- Site visits/field reconnaissance
  - Confirm access, safety, traffic control, flow, depth, configuration, etc.
- Identify alternative sampling locations
- Follow up site visits/field reconnaissance

# TRAFFIC

## SAMPLE LOCATIONS DISTRIBUTED ACROSS SOURCES

10

10

Residential customers likely to use water softeners

53 Total Sampling Locations **10** Residential customers likely to NOT use water softeners

Commercial customers

**11** Industrial customers

**12** Upstream and downstream of outfalls

## SAMPLE LOCATIONS DISTRIBUTED BY LOCATION



## **BOOTS ON THE GROUND FIND SOLUTIONS AMONGST THE ISSUES**

#### Site visits/field reconnaissance

- Confirm access, safety, flow, depth, manhole/channel configuration, etc.
- Unforeseen sample location issue.....



## WEATHER

## CONTINUOUS DATA PROVES TO BE VALUABLE

- Total Number of samples: 228
  - Continuous: 23
  - Grab: 228
- A site-specific conversion factor may be appropriate
  - TDS = Conductivity \* 0.65
  - TDS = Conductivity \* 0.53



default



## **COMMERCIAL STATIONS WEATHER**



### **INDUSTRIAL STATIONS WEATHER**



## **RESIDENTIAL (LIKELY NO SOFTENERS) STATIONS WEATHER**



## **RESIDENTIAL (LIKELY SOFTENERS) STATIONS WEATHER**



### **STREAM STATIONS WEATHER**



## WEATHER RECAP



## ADVICE COLUXIN

## ADVICE COLUMN – ASK PLUMMER

- Continuous data are valuable
- Some manholes go dry
- Significant peaks raise questions and may require further investigations of the watershed
- Determine specific contributors to peaks and troughs
- Continue to collect new data
- Investigate differences between sewersheds
- Investigate seasonal impact on stream and sewer samples
- Investigate first flush
- Flume



## **QUESTIONS?**

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## **PLUMMER**

## WHAT IS FLUME?

- Flume tracks water usage
- 6200 + devices in the SAWS service area
- Water softeners increase water usage in homes and increase the salt concentration in the effluent
- SAWS conducted a study
  - Flume data coupled with survey responses showed 62.3% of homes have water softeners
- Informs SAWS management approach