

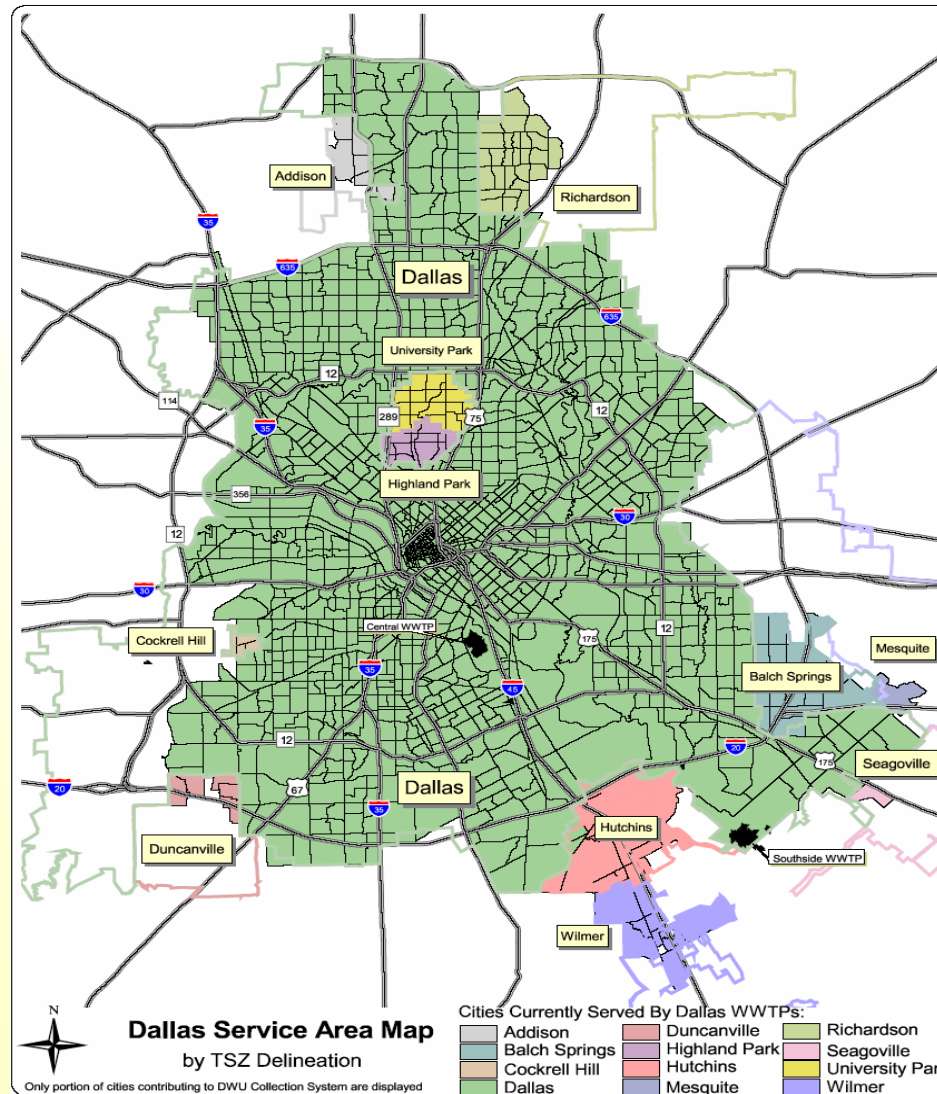
City of Dallas Wastewater Collection System: TCEQ Sanitary Sewer Outreach Agreement

City Council Briefing
January 17, 2007

Briefing Purpose

- Provide update on Wastewater Collection Activities
- Provide Information Regarding Regulatory Issues Associated with TCEQ's Sanitary Sewer Outreach Agreement
- Provide Feedback From QOL Briefing

Dallas Service Area Map



Background Wastewater Collection System

- Key activities essential for effective sanitary sewer system maintenance:
 - Condition Assessment
 - Internal pipe inspection (television investigation)
 - Manhole inspection
 - Flow monitoring
 - Detect and repair sources of inflow and infiltration
 - Regular maintenance of sewer lines through method such as:
 - Mechanical and high velocity pressure cleaning
 - Root Control
 - Point Repairs
 - Rehabilitation and Replacement

Background Wastewater Collection System

- The Wastewater Collection Division operates and maintains the sanitary sewer system in order to collect and transport domestic and industrial wastes to the City's two wastewater treatment plants.
- Sanitary System Facts:
 - 350 Square Mile Service Area
 - 4100 miles of mains
 - Sewer mains sizes vary from 3" to 120"
 - 80% under 12"
 - Estimated sewer system age
 - 0 to 25 years : 16.0 %
 - 26 to 50 years : 37.0 %
 - Over 50 years : 47.0 %
 - 14 Lift Stations
 - 35,661 Manholes
 - 51 Wastewater Flow Monitoring Stations
- System operating under basic recommendation of the 1997 Master Plan (10 year update underway)

How do We Fair Against the 1997 Master Plan Recommendation

Master Plan Recommendations- 1997	FY 05-06 10/05 – 09/06
Increase cleaning of collector mains from 900 to 1300 miles each year	1354
Increase the miles of mains rehabilitated or replaced from 20 miles to 30 miles per year	40
Establish an I/I Analysis program to complete the entire City in 21 years (Wastewater Collection System covers 37 sewer shed)	Thirteen (13) I/I study covering sixteen (16) sewer sheds have been conducted from 1991 to 2005 (seven studies done after 1997)
Begin a stream and sewer overflow monitoring program	Over 50 Monitoring stations throughout the system
Develop a program to require improvement of private sewers	N/A

Background What Are We Doing Now

- Operation and Maintenance (FY 05-06: \$14.5 millions; FY 06-07 : \$15.9 Millions)

FY 05-06 Activities

- Condition assessments
 - Cleaned 34% of total system
 - Inspected over 5% of total system manholes
 - Maintenance
 - Performed 6,413 sewer main repair
 - Installed over 1,709 laterals
 - Treated over 70 miles of mains for roots
 - Responded to over 9,900 stop sewer calls
 - Expanded our grease outreach program to residential customers to minimize and reduce the introduction of grease into the sanitary sewer system
-
- Infrastructure Replacement (FY 05-06: \$ 23.0 Millions; FY 06-07: \$ 35.0 Millions)
 - Rehabed and replaced approximately 40 miles of sanitary sewer mains.
 - Awarded an engineering contract to Montgomery Watson in 2003 to conduct a comprehensive wastewater collection system assessment master plan that serves the city of Dallas to the year 2025.
 - Wastewater Collection System Assessment Master Plan underway (Completion estimated 06/07)

Background Current Regulatory Issues

- **January 13, 2005** TCEQ conducted a scheduled Environmental Quality Investigation on DWU's Wastewater Collection System.
- **February 23, 2005** DWU received a post investigation report with the following:
 - Recognition from TCEQ regarding Dallas' efforts to improve the overall performance of the wastewater collection and treatment system
 - Notice of Violation for the discharge of sewage from the collection system.
- **August 19, 2005** DWU received letter from TCEQ extending an invitation to Dallas to participate in a new SSO initiative program that would address sanitary sewer overflows

What is SSO Outreach Initiative?

- SSO Outreach Initiative is a new state program created because of increase in SSOs due to aging systems
- Intended to reduce the number of SSOs that are reported each year in Texas
- Intended to encourage municipalities to develop and implement corrective action plans before:
 - SSOs impact human health or the environment.
 - SSOs become an enforcement issue.

Why Dallas Should Join The SSO Initiative ?

- The Initiative creates cooperative relationship with TCEQ
- Initiative agreement terms and duration are developed by Dallas
- DWU has previous Notice of violation which increases risk of future enforcement and penalties
- Dallas like many other municipalities have been experiencing increased SSO episodes in recent years (according to TCEQ, thirty (30) Texas Cities have sent letters of interest to join the SSO initiative)
- EPA regulators have stated that they will not pursue an enforcement action against POTW's participating in a state sponsored SSO program
- The initiative will provide Dallas the time needed to evaluate the effectiveness of the ongoing grease abatement program
- DWU is currently conducting a Comprehensive Wastewater Collection System Assessment:
 - The Initiative will provide Dallas the time needed to implement the wastewater collection system assessment recommendations

What are the Key Terms of the Initiative?

- Participation is entirely voluntary
- Must enter into a formal Agreement with TCEQ to address SSO problems
 - The Agreement would not protect the City from formal enforcement for SSOs if the City fails to maintain compliance with the provisions of the negotiated Agreement.
- No penalties associated with the Formal Agreement
- Will not affect TCEQ Compliance History

What are the key Components of the Formal Agreement ?

- Formal Agreement must include:
 - Capacity Plan
 - The capacity plan focuses on developing, recommending, and implementing infrastructure renewal plan to eliminate capacity-related SSOs
 - Maintenance Plan
 - The maintenance plan will focus on SSOs most frequently caused by blockages.
 - Management Plan
 - The plan is centered around management strategies to reduce Sanitary Sewer Overflows.

What are the Regulatory Issues

- Section 301 of the Clean Water Act prohibits the discharge of any pollutant to waters of the United States from a point source, unless the discharge is authorized by a permit. One of the Environmental Protection Agency (EPA) and Texas Commission on Environmental Quality (TCEQ) ongoing enforcement priorities the past two years has been to identify and correct raw sewage discharges (Sanitary Sewer overflows, SSOs) to protect public health and the environment.

What is Sanitary Sewer Overflow?

- A Sanitary Sewer Overflow (SSO) is the discharge of sewage regardless of quantity from the wastewater collection system (manholes, cleanout, pipes) before reaching the treatment plant.
- General Causes
 - Growth/Capacity
 - Structural defects (pipe age, design, material)
 - Blockages (grease, tree roots, debris)
 - Extended drought/extreme wet weather conditions leading to settled, cracked and leaky or collapsed pipes
 - Corrosion

Goals and Priorities

- Primary goal to achieve an average 2% per year reduction in Sanitary Sewer Overflows over the next ten years beginning in FY 07-08
- Complete the ongoing Comprehensive Wastewater Collection System Assessment to determine future O&M and replacement needs
- Continue the main replacement/rehabilitation program & update the geographic information system (GIS) to reflect the changes
- Place more emphasis on proactive system maintenance utilizing an aggressive preventive maintenance cycle targeting historically problematic areas.
- Revise Food establishment Ordinance in FY 07 to specify frequency for pumping grease traps
- Establish a measurement system to assess progress

Feedback From the December 11 Briefing to QOL Committee

Issue	DWU Response
Any addition ordinances related to the grease that need to be included in the food establishment ordinance(s)?	We do not believe that additional ordinances will be needed if the proposed grease pumping requirement is fully incorporated, enforced, and augmented with an expanded public grease abatement outreach program.
Is there a down side to SSO Initiative?	Other than our commitment to comply with the SSO Initiative Agreement, there is no downside to joining the initiative
What measures are we taking to control SSO's?	<ul style="list-style-type: none"> ▪Increased the replacement program funding ▪Initiated a grease abatement outreach program to reduce grease related SSOs ▪More efforts has been directed toward predictive maintenance by performing more condition assessment, cleaning, root and grease treatment in a historically problematic areas
Where are we standing with replacing the entire system(collection system) within 21yrs.	The 1997 master plan recommendation called for the entire collection system to be studied (I/I study) in a 21 year cycle. DWU is on track to meet this requirement; Thirteen (13) I/I study covering sixteen (16) sewer sheds have been conducted from 1991 to 2005
Received support from the QOL committee to proceed with DWU recommendations	Scheduled Full Council Briefing for January 17, 2007, and drafted an agenda item for the January 24 th Council meeting seeking Council permission to join the TCEQ initiative

Schedule

- December 11, 2006 , QOL Committee Briefing
- January 17, 2007, Full Council Briefing
- January 24, 2007, Permission to Join the initiative through council resolution
- January 25, 2007, Submit the City of Dallas Sanitary Sewer Action Plan to TCEQ

Recommendation and Next Steps

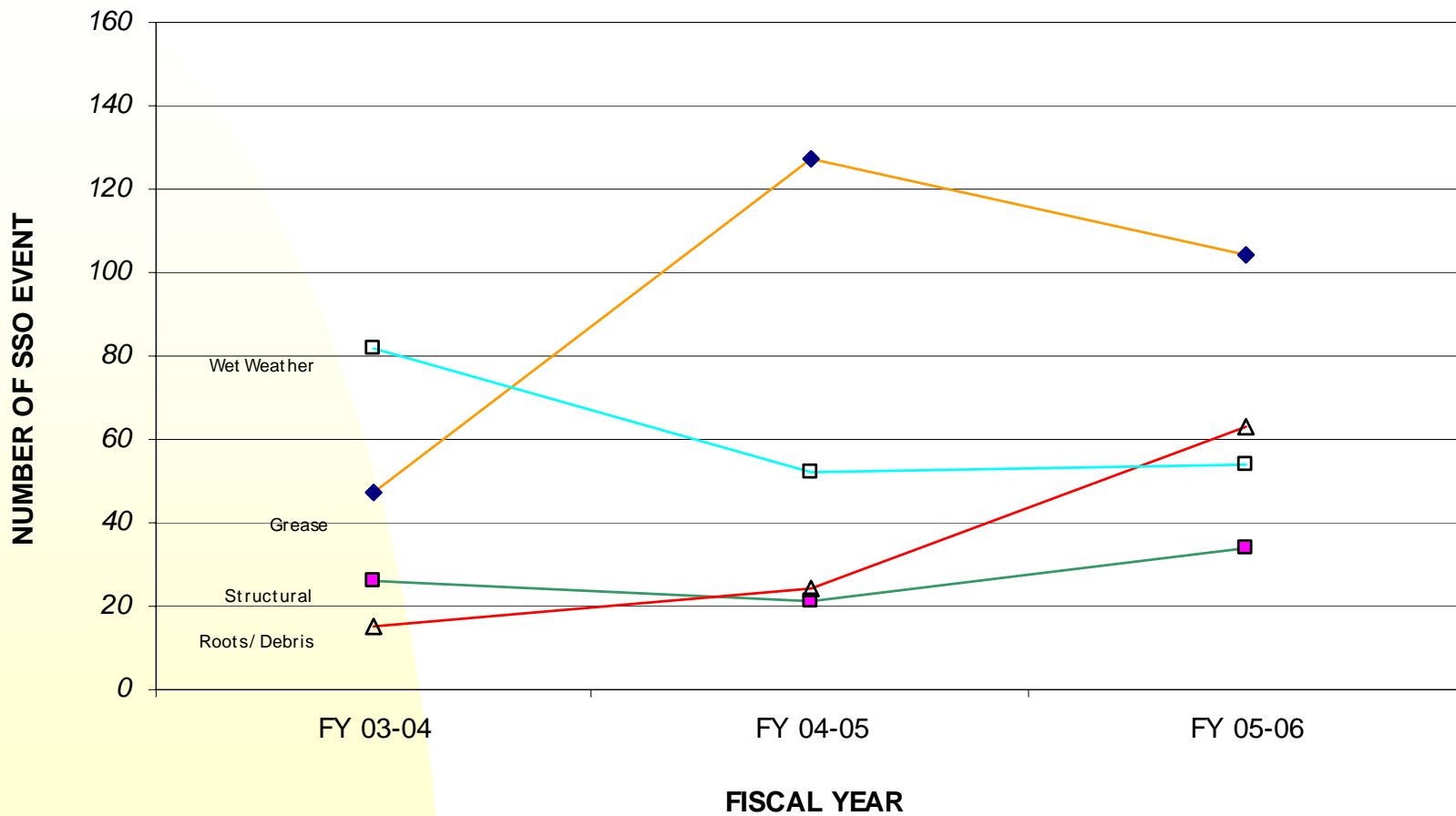
- Seek Full Council feedback on the SSO Initiative Agreement
- Seek Full Council support
- Revise Food Establishment Ordinance to specify frequency for pumping grease traps
- Progress will be monitored and reported
- City Council will be briefed on future updates/plans

Appendix

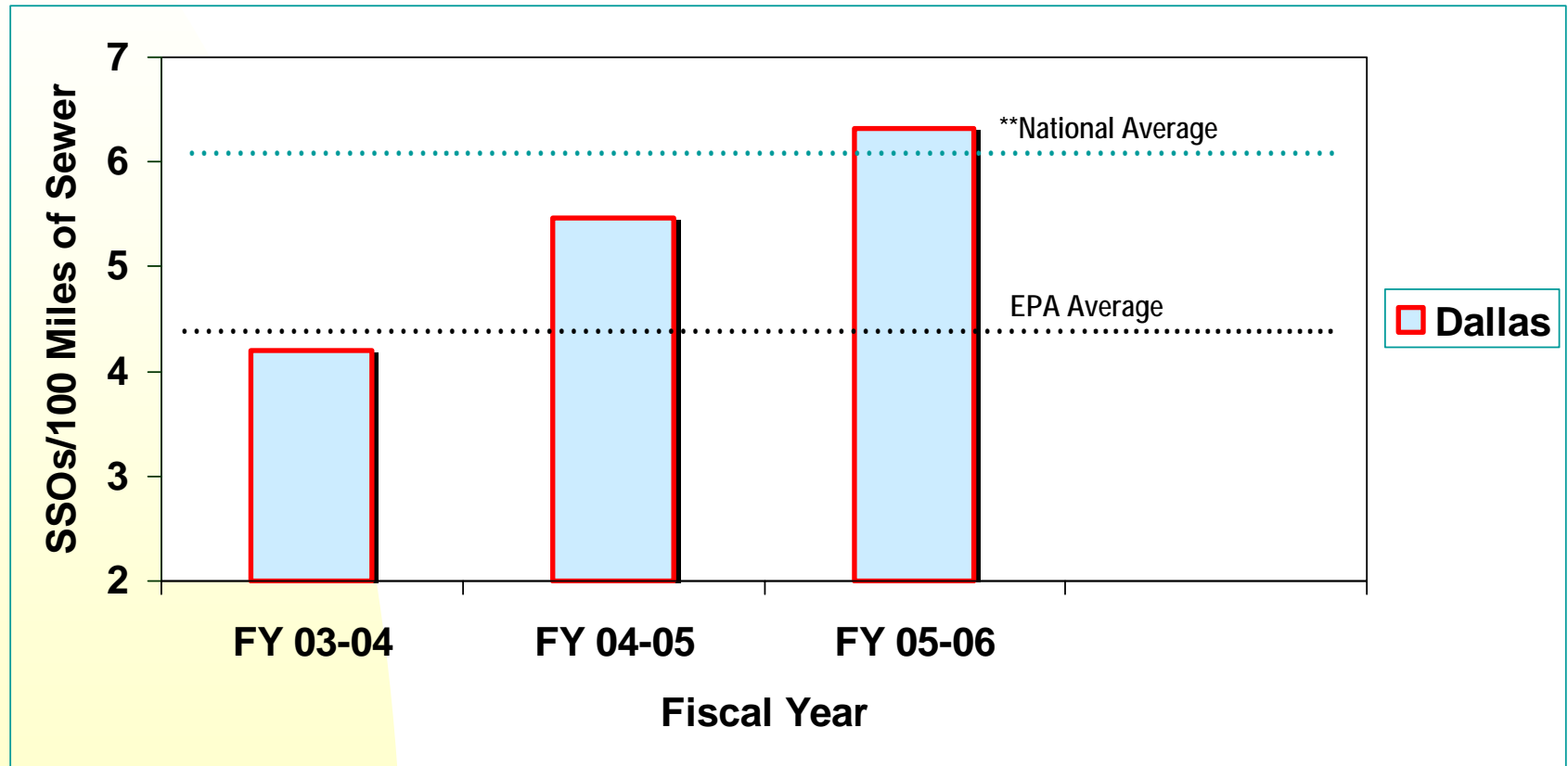
- Benchmark Data
- Proposed Initiative Action Plan
- 1990 Administrative Order Background
- Municipal Grease Programs in Texas

SANITARY SEWER DATA

(October 1, 2003 thru September 30, 2006)



How Dallas Compares to National Benchmark Data



** MWH Wastewater Collection Master Plan Update

What Do the Charts Tell Us ?

In General:

- Based on the previous charts, Dallas is little above the national average for sewer overflows per 100 miles of sewer and shows overall upward trend

Specifically:

- Structural and wet weather related overflows have decreased (***replacement & rehabilitation***) while blockages related overflows have increased (***grease & tree roots***).

Proposed Initiative Action Plan

City Of Dallas Initiative Action Plan

The Maintenance Plan: The maintenance plan will focus on dry weather SSOs and stoppages most frequently caused by debris, grease and roots.

➤The frequency of Maintenance Plan activities depends on factors such as sewer stoppage causing residential flooding, customer odor complains, pipe failure history, pipe size, GIS mapping of sewer main/manhole overflows, and areas with known history of grease problem, such as restaurants and apartment complexes. Also, it is based on criticality index ranking developed by the Comprehensive Wastewater Collection System Assessment Study. Below are our target numbers for each category of cleaning and treatment:

- Perform annual sewer main cleaning of **1300 miles (30% of system)**
- Conduct corrective and preventive mechanical root removal **on an as needed basis**

The Inspection and Monitoring Plan: The Inspection Plan will provide necessary data for scheduling maintenance, repair and rehabilitation actions to prevent possible SSOs, or to detect conditions that would lead to sanitary sewer overflows.

- Conduct CCTV inspection of **120 miles sewer(3% of the system)** annually to help identify defects
- Inspect all Collection System **14 Lift Stations** on a weekly basis and remotely monitor the stations 24 hours a day
- Inspect at least **1800 manholes (5% of the manhole in the system)** annually
- Conduct of smoke testing of sewer mains on as needed bases
- Conduct **120 miles(3% of the system)** of creek walking annually in selected sewer basins and areas where sewer mains have become exposed due to creek/stream erosion to identify and correct system defects
- Use existing **permanent flow metering sites** which are equipped with data acquisition radio telemetry equipment for early detection of restriction and/or possible failures throughout the collection system that could result in wet weather SSOs

City Of Dallas Initiative Action Plan (cont'd)

The Management Plan: The major component of the Management Plan is record keeping of information captured regarding age, condition and capacity of the main to be used for planning purposes and to comply with regulatory requirements.

- Complete on-going Comprehensive Wastewater Collection System Assessment (the Wastewater Master Plan) for the entire system
- Develop a computer model for the identification of system capacity issues related to wet-weather SSOs
- GIS population of the entire 4,000 miles of wastewater mains which include information regarding age (when available), size and type of material for each of the pipe segments based on best available information
- Develop a GIS based data management strategies to capture, store, and update SSO related information. Utilize this information to develop a map of cluster areas where majority of SSOs are concentrated. Add these locations to a more frequent “hotspot” cleaning/maintenance list
- Conduct a study to evaluate the most effective treatment products for the Fats, Oils, and Grease (FOG) in the collection system
- Develop a grease ordinance change to modify cleaning frequency of grease traps and submit it to the Dallas City Council for consideration
- Inspect 1000 grease generating establishments annually
- Promote grease education by attending 12 public outreach events annually. Provide proper grease disposal information to all residential customers through residents’ water bill insert
- Set up an annual grease educational workshops with the Apartment Association of Greater Dallas and the Dallas Restaurant Association regarding grease education
- Evaluate the effectiveness of the program by comparing the number of grease-related SSOs to the historical grease-related SSO data

City Of Dallas Initiative Action Plan (cont'd)

The Capacity Plan: The Capital Improvement Plan develops, recommends, and implements infrastructure renewal plan to eliminate capacity-related SSOs as well as SSOs caused by deteriorating pipe condition

- Use trench-less technology to rehabilitate mainlines in emergency situations to avoid SSOs caused by structural failures.
- Continue replacement of the existing deteriorated sewer mains based on the finding and/or recommendations of the Inspection Plan
- Establish a sewer replacement program based on the criticality ranking developed by the Comprehensive Wastewater Collection System Assessment.
- The Comprehensive Wastewater Collection System Assessment (CWWCSA) is developing CIP recommendations to integrate capacity and renewal needs. The hydraulic model being completed as part of the CWWCSA projects capacity needs based on population projections through the year 2050.

The following list details funding allocations for FY 06-07:

- \$15.3 millions O & M Budget
- \$ 20.0 millions for main replacements
- \$800,000.00 for trench-less technology, to rehabilitate mainlines in emergency situations to avoid structural failure and possible SSOs as a result
- \$900,000.00 for additional main cleaning and televising
- \$300,000.00 for root treatment

Previous EPA Administrative Order (A.O.) for Sanitary Sewer Overflows

- EPA issued An Administrative Order (A.O.) to DWU for Sanitary Sewer Overflows on January 1990
- The A.O. focused on the elimination of several sanitary sewer overflows associated with storm water runoff and groundwater that enters the sanitary sewer system during a storm through cracks in sewers (Infiltration & Inflow-I/I).
- DWU Commissioned CH2M HILL in 1991 to update the Wastewater System Master Plan and recommend remedial measures to improve the efficiency of the wastewater collection and treatment system.
- The plan involved a series of collection system capacity evaluations, new construction, major pipeline replacement projects, and other associated work for a total cost of \$117 Millions.
- DWU received an official letter from the EPA confirming the closing of the Administrative Order on March 23, 2000

EPA Administrative Order Cost of Completed Projects

- Manhole Rehabilitation
 - ◆ 2 Projects
 - ◆ \$669,200
- Pipeline Rehabilitation
 - ◆ 10 Projects
 - ◆ \$50,224,657
- Inflow and Infiltration Studies (Master Plan)
 - ◆ 10 Projects
 - ◆ \$13,866,329
- Pipeline Replacement
 - ◆ 14 Project
 - ◆ \$11,786,937
- New Pipeline Construction
 - ◆ 8 Projects
 - ◆ \$40,447,110



Wastewater Master Plan Program *Implementation Phase (Cont'd)*

- DWU has started a sewer-replacement program to reach the target the 50 years average life for sewers and followed that with an aggressive maintenance program to extend main age to 75 years or beyond.

Post A.O. Pipeline Replacement Spending

◆ FY 99 – 00	\$10,076,286
◆ FY 00 – 01	\$18,562,911
◆ FY 01 – 02	\$15,892,523
◆ FY 02 – 03	\$21,028,460
◆ FY 03 – 04	\$23,172,028
◆ FY 04 – 05	\$22,106,932
◆ FY 05 – 06	\$23,000,000

List of Other Texas Cities SSO Initiative Activities

City	Action
Garland	Joining
Rowlett	Joined
Mesquite	Joined
Grand Praire	Joined
Irving	Joined
Farmers Branch	Joined
Arlington	Joining
Fort Worth	Action Plan due in January
Trinity River Authority	Action Plan due in January
Odessa	Joined
Laredo	Joined

Municipal Grease Programs In Texas

Fort Worth Water Department Grease Program

- Fort Worth Water Department Grease Program
 - Started in 1999
 - After 7 years of efforts, program is operational and yielding dramatic results
 - Grease-related SSOs have been steadily *decreasing*
 - Positive recognition of TCEQ

Fort Worth Water Department Grease Program

- Fort Worth Water Department Grease Program
 - Close coordination with Development Dept.
 - Review and approval of grease trap design for new restaurants
 - Close coordination with Health Department
 - Comprehensive list of all restaurants
 - Extensive public outreach
 - Proactive efforts with restaurants
 - Food Establishment Facilities have a minimum grease trap cleaning interval
 - Permitted waste haulers submit manifest to city
 - City uses database to cross-reference waste hauler activity with restaurants to identify restaurants that violated their cleaning interval
 - Non-compliance notices to restaurants has resulted in 85% compliance and significant reduction in grease-related SSOs
 - Enforcement action for remaining non-compliant restaurants

Dallas Grease Program

- Grease Abatement Program
 - ◆ Public outreach activities started in October 2005
 - ◆ Participated in over 30 public outreach activities in 2005/06
 - ◆ After 1 year, a decrease of grease related SSO has been observed
 - ◆ Drafted revisions to Chapters 19 Article X and 49 Article IV of the Dallas City Code to incorporate the Model Liquid Waste Ordinance of Texas House Bill 1979
 - ◆ Created a full time grease abatement public outreach position

Dallas Grease Program

- Grease Abatement Program
 - ◆ Purchased XC2 software to track inspections of Food Service Establishments (FSEs)
 - ◆ Grease Abatement Pilot Program for Apartments
 - ◆ Conducted Apartment Managers training with Stormwater, Water Conservation and Sanitation
 - ◆ Meetings with Stakeholders - Greater Dallas Restaurant Association and Apartment Association of Greater Dallas (AAGD)
 - ◆ Developed brochures and water bill inserts on grease abatement best management practices
 - ◆ Developed the first book cover on Grease Abatement and had 80,000 delivered to DISD schools, grades 1-8, for the fall of 2006

Let's Tackle the Grease in This Kitchen!

Why should I help?

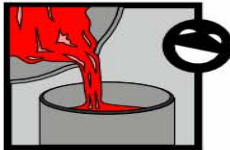


Do



Don't

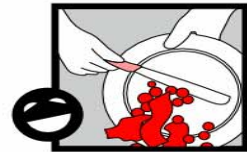
- Prevent grease buildups from blocking sewer lines.
- Stop sewer overflows into streets and storm drains.
- Reduce the number of times you have to clean your grease trap (food services)
- Save money spent on costly cleanups of sewage spills.
- Protect the quality of our water.



Put oil and grease in covered collection containers.



Don't run water over dishes, pans, fryers, and griddles to wash oil and grease down the drain. Don't rinse off oil and grease with hot water.



Scrape food scraps from dishes into trash cans and garbage bags and dispose of properly. Avoid using your garbage disposal.



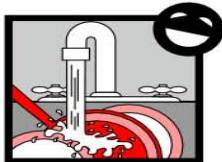
Don't pour oil and grease down the drain.



Remove oil and grease from dishes, pans, fryers, and griddles. Cool first before you skim, scrape, or wipe off excess grease.



Don't put food scraps down the drain.



Prewash dishes and pans with cold water before putting them in the dishwasher.



Cover kitchen sink with catch basket and empty into garbage can as needed.



Cover floor drain with fine screen and empty into garbage can as needed.

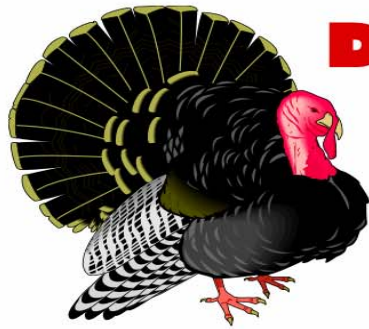
More Ways to Tackle Grease

Use environmentally safe cleaning products instead of harsh detergents or cleaners that can damage sewer lines.

If you generate large amounts of used cooking oil, recycle it. To find a recycler, check the phone book under "recyclers" or "rendering companies."

If you generate small amounts of used cooking oil, pour it into a container you can throw away. Never pour it down the drain.

Start a compost pile at your home with scraps that are not meat. Find out about composting in the TCEQ publication, "A Green Guide to Yard Care" (G1-028)



Don't be a Turkey!

Kitchen Grease is Everybody's Problem!

Why should I help?

- Prevent grease buildups from blocking sewer lines.
- Stop sewer overflows into streets and storm drains.
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- Protect the quality of our water.

Do



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This flyer was made possible thanks to information taken from the TCEQ's Flyer #GI-290.

City of Dallas Publication 06/07:07

Let's Tackle the Grease in This Kitchen!

Why should I help?

- ✓ Prevent grease buildups from blocking sewer lines.
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City of Dallas Publication #04/05-27



Seasons Greetings

Austin Grease Program

■ City of Austin

◆ Implemented aggressive grease program



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Special Services Division

Industrial Waste Control / Pretreatment

Grease Trap Maintenance

Grease traps are designed to separate out the Fats, Oils and Greases (FOGs) and solids normally found in food preparation waste from the rest of the wastewater being discharged to the City's sanitary sewer system (View our Grease Trap Presentation in [English](#) or in [Español](#) [Adobe PDF]). The FOGs and solids have to be removed on a regular basis in order for these grease traps to work properly.



Recent amendments made to [Chapter 15-10 of the Austin City Code](#) (Exit to American Legal) include a requirement that all grease traps be cleaned at least once every three months. Furthermore, the requirement states that all traps must be cleaned when grease and solids accumulation in the final compartment reaches 60% or more of the wetted height of the grease trap, meaning that many traps will have to be cleaned more often than the once every three months minimum.

acwcp
FAT FREE SEWERS

Grease clogs your arteries AND the sewer system!
Dear Home Owner: The Environmental Protection Agency has ordered Austin to eliminate sewage overflows caused by grease and aging sewer lines or face serious fines. The Austin Clean Water Program (ACWP) oversees the repair and replacement of old sewer lines. You can help ACWP protect creeks, yards and homes from sewage overflows by keeping sewers Fat Free.

- Grease comes from meats, butter and margarine, lard, food scraps, sauces and dairy products. NEVER pour grease down sink drains or into toilets.
- Put grease and food scraps in a sealed container or bag to prevent odor and bug problems and place in the garbage cart. Large amounts of cooking oil can go to a grease recycler listed in the Yellow Pages.
- Place a basket/strainer in sink drains to prevent food scraps from going into the garbage disposal. Empty contents of the basket/strainer into a sealed container or bag before placing in the garbage cart.

Remember: Many of Austin's sewage overflows are caused by grease blockage. Eliminating grease from your drains will help control utility rates by preventing expensive sewer line repairs. Best of all, Austin's environment will benefit.

The Austin Clean Water Program is sponsored by the City of Austin Water and Wastewater Utility.
To report sewer overflows, call 972-1000.

To contact ACWP, call 684-3204 or e-mail lisa.rhodes@ci.austin.tx.us.
www.ci.austin.tx.us/acwp/

Si Ud. necesita información en español, por favor llame al 684-3204.
For large print copies, call 684-3204
Information provided by the Water Environment Federation

Austin Clean Water Program

Houston Grease Program

- City of Houston
 - TCEQ issued NOV and Compliance Plan
 - City developing aggressive grease program