



MEMORANDUM

To: Mayor and City Council

From: Mindi Hurley, Director of Community Development

Date: November 12, 2024

Reference: Consider approval of an Ordinance to amend the Code of Ordinances by repealing Chapter 11, “Industrial Waste and Sewer Use Regulation,” in its entirety and replacing it with a new Chapter 11, “Industrial Waste and Pollution Ordinance,” and authorizing the Mayor to sign.

2040: Sustainable Government

Introduction:

The purpose of this agenda item is to consider approval of an Ordinance to amend the Code of Ordinances by repealing Chapter 11, “Industrial Waste and Sewer Use Regulation,” in its entirety and replacing it with a new Chapter 11, “Industrial Waste and Pollution Ordinance”.

Background:

The City of Coppell contracts with TRA for industrial inspection services, industrial sampling services, analytical services, and treatment services through the Central Regional Wastewater System (CRWS.) This contract protects the City of Coppell’s wastewater collection system and ensures that all industrial uses of the system are properly monitored. It also ensures that the City complies with all applicable state and federal laws, including the Clean Water Act and the General Pretreatment Regulations.

Texas Commission on Environmental Quality (TCEQ) requires Trinity River Authority to continuously evaluate its operation and update its local limits whenever it renews its Central Regional Wastewater System permit. This evaluation ensures that TRA local limits are representative of the current flows, treatment capacities, and overall wastewater pollutant loadings and characteristics.

The City of Coppell operates under Ordinance 2003-1028, adopted in 2003. However, TRA revised its Technically Based Local Limits (TBLL). As a result, Coppell’s local ordinance must be updated to ensure compliance with federal and state standards. This will involve repealing Ordinance No. 2003-1028 and adopting a new ordinance that reflects these improvements. To maintain compliance, Trinity River Authority (TRA) requires that the updated ordinance be adopted by Dec 1, 2024. Failure to adopt these revisions by the deadline could result in the suspension of Coppell's contract with TRA for wastewater treatment services. Key changes to the ordinance include:

- New abbreviations and definitions
- Expanded prohibited discharges, including new local limits.
- Updated Best Management Practices and penalty provisions.

As a customer of TRA, the City of Coppel is required to adopt the new Technically Based Local Limits (TBLL) for wastewater discharges as required by the National Pollutant Discharge Elimination System (NPDES) and the Texas Commission on Environmental Quality (TCEQ). This ensures that the City meets the requirements set forth by the Clean Water Act (33 United States Code §§ 1251 et seq) and the General Pretreatment Regulations (40 Code of Federal Regulations Part 403).

Upon adoption, the City of Coppel will notify TRA to confirm the ordinance update, allowing the City to continue participation in the wastewater pretreatment program. The contract amount with TRA is \$9,500.00. This is the same cost as last fiscal year. All expenses incurred by the Environmental Health Division for inspections and sampling are charged back to the industry.

Benefit to the Community:

This contract protects the City of Coppel’s wastewater collection system and ensures that all industrial uses of the system are properly monitored. It also ensures compliance with applicable state and federal laws.

Legal Review:

The City Attorney has reviewed this item.

Fiscal Impact:

There is no fiscal impact associated with this item. Any costs incurred by staff from inspections, sampling, and monitoring will be charged back to the industrial users.

Recommendation:

The Community Development Department recommends approval of this item.