

Evaluating Regionalization for Proposed Wastewater Systems

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Table of Contents

| What Is Wastewater Regionalization? | | | |
|---|----|--|--|
| Benefits of Regionalization | | | |
| Is a Regionalization Analysis Required? | | | |
| How Do I Evaluate Regionalization? | | | |
| Step 1: Identify nearby WWTPs and Collection Systems | .3 | | |
| Step 2: Request Service from the Existing WWTP Owner/Operator | .4 | | |
| Step 3: Conduct a Financial, Managerial, and Technical Analysis | .5 | | |
| Step 4: Request a Pre-Application Meeting | .5 | | |
| Step 5: Submit Regionalization Documentation | .5 | | |
| Where Can I Get More Information? | .5 | | |
| | | | |
| Figure 1. Evaluating Regionalization Flowchart7 | | | |

What Is Wastewater Regionalization?

Regionalization of wastewater collection or treatment systems is the consolidation of multiple service areas (such as subdivisions) into a regional service facility or collection system that serves a large part of the population over a broad geographic area. More simply, regionalization is connecting new subdivisions or housing units to an existing wastewater collection system and its associated wastewater treatment plant rather than constructing a new wastewater treatment plant (WWTP). The regional system may be owned or operated by a public or private entity that provides wastewater service by means of physically connecting new systems to the existing regional system.

Benefits of Regionalization

Regionalization promotes a long-term solution to wastewater management by consolidating wastewater collection, treatment, and disposal into larger service providers. 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. Find more information online about regional certification for wastewater service providers.¹

Is a Regionalization Analysis Required?

Texas Water Code Section 26.081 requires TCEQ to implement a policy to "encourage and promote the development and use of regional and areawide 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."

To implement the policy, TCEQ requires owners/operators of proposed new WWTPs to evaluate regionalization and document those efforts before applying to TCEQ for a discharge permit for a new WWTP. Applicants for a Texas Land Application Permit (TLAP) are not required to evaluate regionalization.

How Do I Evaluate Regionalization?

Step 1: Identify nearby WWTPs and Collection Systems

Perform a search and identify all permitted domestic WWTPs 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 Certificate of Convenience and Necessity (CCN) area. Compile a list of these facilities and create a map of their locations with respect to your proposed facility.

Here are a few tips that can make your research more productive:

¹ www.tceq.texas.gov/waterdistricts/regional-provider-certification

- Use the online resources in Table 1.
- Drive through the area. Wastewater systems must have identification at all plant sites.
- Contact city and county offices to find out about subdivision plats on file. This information may be available online.
- Contact each wastewater system's owner or operator to find the limit of its service area and if they are aware of other WWTPs in the area.

If there are no WWTPs within a three-mile radius and no portion of your service area is within another utility's sewer CCN area, proceed to Step 4.

| Provided by | Online Resource | Available Information |
|------------------------|--|--|
| PUC | <u>CCN Map Viewer</u> ² | Find the wastewater service provider for a specific address or property. |
| TCEQ | Wastewater Outfall Map Viewer ³ | 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. |
| Cities and Counties | Subdivision plats/property information | Access subdivision plat maps. Information available online varies by city/county. |

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

Step 2: Request Service from the Existing WWTP Owner/Operator

If your proposed facility is within a three-mile radius of a 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 to connect 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.

You are not required to send correspondence requesting service to owners/operators of unconstructed facilities; however, these facilities must be included in the list of facilities and located on the map in Step 1.

If a request for service was approved, you must either connect to the system or continue to Step 3.

If you have documented one of the following, skip to Step 4:

- no response received from the permitted system owner or operator within 30 days of the date your request(s) for service was mailed,
- your request for service was denied, or
- service(s) offered are based on special conditions, such as annexation.

² www.puc.texas.gov/industry/water/utilities/map.aspx

³ www.tceq.texas.gov/goto/wastewater_outfalls

Step 3: Conduct a Financial, Managerial, and Technical Analysis

If a request for service was approved but you have reason to believe that connecting to the existing system is unfeasible, cost prohibitive, or otherwise not a viable option, you must provide supporting information with your wastewater discharge permit application. Supporting information can include an evaluation of the financial, managerial, and technical aspects of your proposed facility and the existing system. Factors for consideration may include the following.

Financial

- Evaluate the cost-benefit analysis of regionalization compared to the construction, maintenance, and operation of a stand-alone system. TCEQ recommends that the cost-benefit analysis be prepared by a professional engineer licensed to practice in Texas.
- Evaluate the affordability of rates proposed by a regional or areawide system compared to the projected rates of your stand-alone system.
- Consider other financial factors specific to your case (i.e., projected development schedule, costs of obtaining easements, etc.).

Technical

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

Managerial

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

The above factors for consideration are not exhaustive. TCEQ staff may consider other factors not mentioned above, as appropriate.

Step 4: Request a Pre-Application Meeting

Request a pre-application meeting with TCEQ staff to assess whether a stand-alone system is the right option for you based on your evaluation.

Step 5: Submit Regionalization Documentation

If you have determined that regionalization is not a viable option for your project, the information you've gathered must be submitted with your permit application to complete the "Justification of Permit" section in the Domestic Technical Report 1.1 of the permit application (TCEQ-10054).

Where Can I Get More Information?

If you have additional questions, you can contact the TCEQ Municipal Permits Team at 512-239-4671 or email <u>WQAP@tceq.texas.gov</u>.



