

US EPA ARCHIVE DOCUMENT

MEMORANDUM

TO: Jim Coulter
Assistant Director of Wastewater Utilities
City of Denton

FROM: Adele Cardenas, P.E.
XL/Reinvention Coordinator
Compliance Assurance and Enforcement Branch

DATE: April 28, 1999

SUBJECT: Comments for the City of Denton Project XL Proposal - Formal Submission -Final Project Agreement

The following are comments compiled from our Project XL team members which include: Region 6, Office of General Counsel, Office of Enforcement & Compliance Assurance, Office of Reinvention and the Office of Water. The Agency would like to acknowledge the City staff who prepared the formal proposal for our review. These comments will be discussed on our conference call scheduled for April 29, 1999.

Page 6, Last Paragraph

This paragraph describes that the proposed XL project would involve the reduction of inspections to a biannual basis instead of the current annual basis. Also, the “four-day duration of monitoring site visits will be reduced to two randomly scheduled days. Please describe and clarify who this criteria and reduction in sampling would apply and be specific.

Page 7, First Full Paragraph

Please provide additional information regarding the Phase II Stormwater Program to understand how it will yield superior environmental performance. How will the City address the Phase II Stormwater Program if it does not work as planned? Please explain addressing the impacts on the environment both positive and negative. What measurements will be used to determine how the Phase II Stormwater Program is working.

Page 11, Sentence Numbers 1 Through 14

Please clarify and explain how the resources will be addressed for purposes of this project. (If sensitive in specifying, please address during our discussions)

Please clarify the details of the expected benefits from the proposed changes for this project

outlined on page 11. It is unclear on how you expect to get to your end point.

Page 11, Paragraph at the Bottom of the Page

Please clarify the first sentence, what are the “additional environmental benefits otherwise unattainable?”

Please clarify in the second sentence, what will constitute the “attempt” to reduce the concentration of the pollutants, and what will be done if the “attempt” is not successful?

Please include a diagram or discuss the locations for the purpose of this project as addressed in the third sentence, where specifically are the lift stations located?

Please clarify in the fourth sentence on how specifically identification and control of pollutants will result in improved influent quality?

Please clarify the nature of the BMPs. Are they existing or new to your program?

Page 12, First Paragraph

Please complete Subpart A and Subpart B with specifics to your project.

Please clarify with regard to how the Phase II Stormwater program will be implemented.

Please clarify further the nature of the “creek side buffer zones”, and how they will reduce the nutrient, pesticide and herbicide levels in receiving streams. Is this a city or county ordinance requirement or policy that the City of Denton has implemented as a result of this XL Project?

Page 13, First Paragraph

Please define “material change” as discussed in this paragraph.

Page 15 - 17

Please note that all [#’s] and [?] need to be discussed and negotiated for timing purposes and noted specific statute sightings also need to be filled in as well.

Page 20 - Section V.

Please clarify the environmental benefit that would be created by this project. A before and after XL diagram would assist anyone who reviews this project proposal. Also note that any referencing should be accommodated throughout the document to ease any information exchange. Adding any information that would assist in explaining or expanding on this project

can be noted in a appendix to the FPA.

Enforcement Screening of Industrial Users:

Please include a statement in the FPA that explains how the City will address enforcement screening of those industrial users participating in this project. Will an agreement of any kind be utilized to address the commitment of those industrial users participating with a notice of how non-compliance will be addressed for purposes of this project.

Additional Historical Perspective-

Please provide in the FPA how much historical information has been collected and how it will be utilized to assist in the development of the baseline for this project. Any additional information on how the City intends to utilize past historical information would be beneficial to those not familiar with your POTW.