

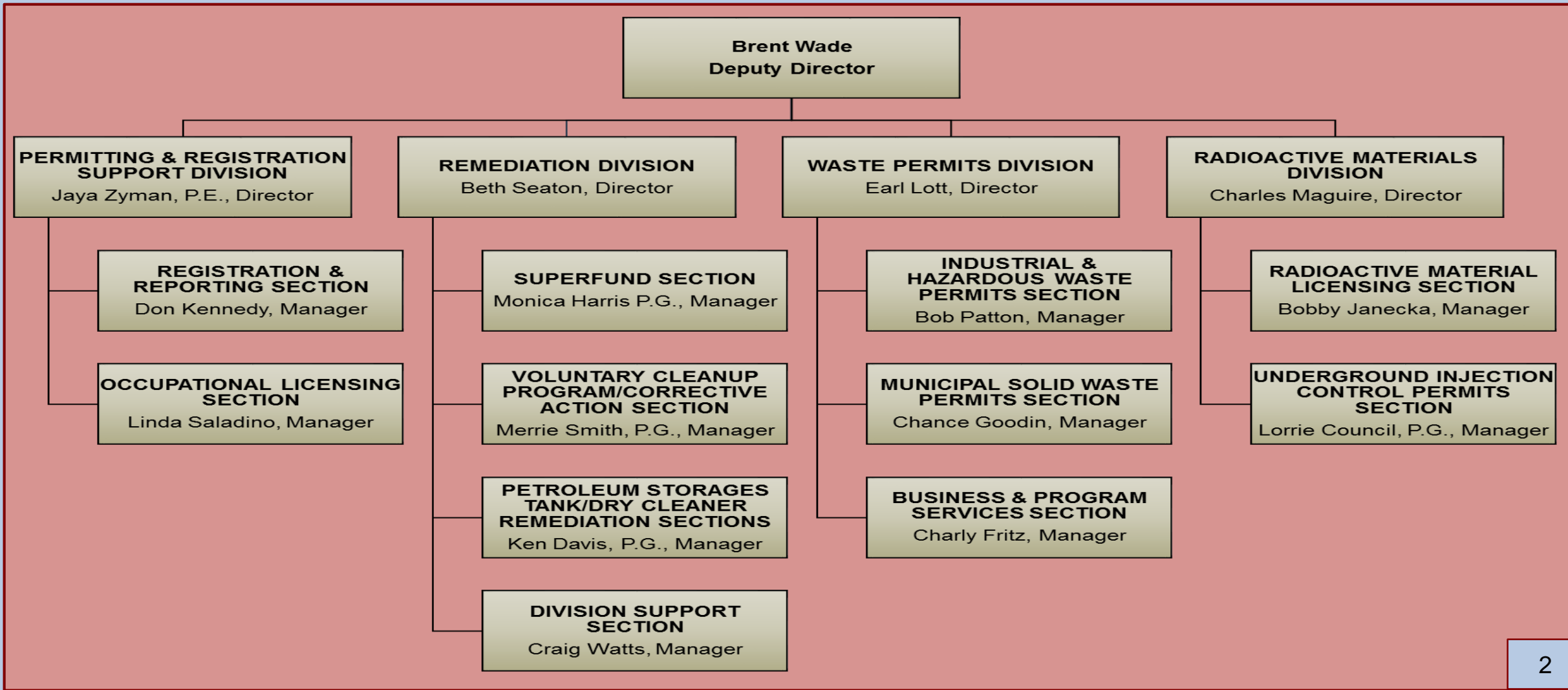
# TCEQ Industrial and Hazardous Waste Program Update

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# Office of Waste



# I&HW Sites

- Permits: 181
  - Commercial: 53
  - Non-Commercial: 128
- Post-Closure Orders: 6
- Notifications, reports, etc.



# Combustion

- 23 sites, 57 combustion units
  - 14 Incinerators
  - 34 Liquid-Fired Boilers
  - 8 Halogen Acid Furnaces
  - 1 Sulfuric Acid Furnace





# Technical Analysis Group

Items Processed & Reviewed	FY16 Numbers
Audits	557
Recycling Activity Notifications	118
DSW & HSM Exclusions	11
QA/QC Data Sets	44



# Program Updates



# Topics Covered Today

- EPA Hazardous Waste Generator Improvement Rule
  - Other potential changes in the rule package
- Definition of Solid Waste Vacatur
- Coal Combustion Residuals Program
- Hazardous Waste Combustion Tools
- Revised 00002 form





# Continued Topics Covered

- Closure Cost Estimates
- Other Updates
  - Copies of Checks
  - Permit Transfers – website updated
  - Construction or Closure Plan accepted
  - Planning for 2020
  - Posted positions





# EPA Hazardous Waste Generator Improvement Rule

- 60+ changes
- Reorganize the rules based on generator status
- Clarify areas in the rule where ambiguity existed
- Add flexibility for generators managing hazardous wastes under certain conditions
- Improve efficiency and effectiveness
- Non-compliance rate 10 to 30%



# EPA Generator Improvement Rule - continued

- More stringent
  - SQG re-notification
  - Labeling requirements
  - Reference guide for contingency plans



# EPA Generator Improvement Rule - continued

- Less Stringent
  - VSQG consolidation
  - Episodic generation
  - 50' rule waivers
  - Academic labs- 12 months for accumulation
- Rulemaking Team





# Other potential rule changes

- Import/Export rule
- Comparable Fuels Vacatur
- 40 CFR 261.4 Coal Combustion Residuals (CCR) beneficial use rule



# DSW Vacatur

- July 7, 2017 DC court of appeals issued opinion
- Mandate goes into effect after all of motions are filed and responded to
- EPA won't have details on implementing court decision till October
- TCEQ status – rule is currently in place



# CCR Rule

- Positions
- Self implementing rule until a permit is granted
  - EPA encouraging adoption by states
  - EPA has to approve a state program





# Hazardous Waste Combustion

- Standardized Combustion Program submittals
  - CPT Plans and Reports
  - Cover Sheet
  - Checklists (January goal)
- Future standardization of other industrial and hazardous waste reports



# **Hazardous Waste Combustion Program**

- **Example Comprehensive Performance Test (CPT) Plan Cover Sheet**
- **Example CPT Plan Checklist**
- **Example Notification of Compliance (NOC) Report QA/QC Checklist**
- **Example CPT/RCRA Test Report Draft Format**

— Related content —

# New TCEQ Form 00002

- One form instead of three (no 8700-12 or 10400)
- Fillable pdf
- Updated instructions
- Submit only the pages pertaining to updates





# Closure Cost Estimates

- Technical Guidance No. 10 – status update
- Cost Estimating Tools
  - CostPro no longer supported by EPA
  - IHW Permits will begin using RACER
  - Bids from third party contractors



# Other Updates

- Changed instructions on copies of checks
  - following information in regards to the application fee:
  - check number,
  - date of check, and check amount.
- Please do not submit a photocopy of the actual check (or equivalent transaction submittal) with your application



# Other Updates

- Permit transfer webpage updated
  - (Class 1 or 1.1)
  - Clarifies if owned but operated by another party
- Encourages pre-application meetings
- Updates instructions for submitting a class 1.1 modification





# Other Updates

- Permit modification after Construction or Closure Plan accepted
- Status of posted positions



# Process Improvements

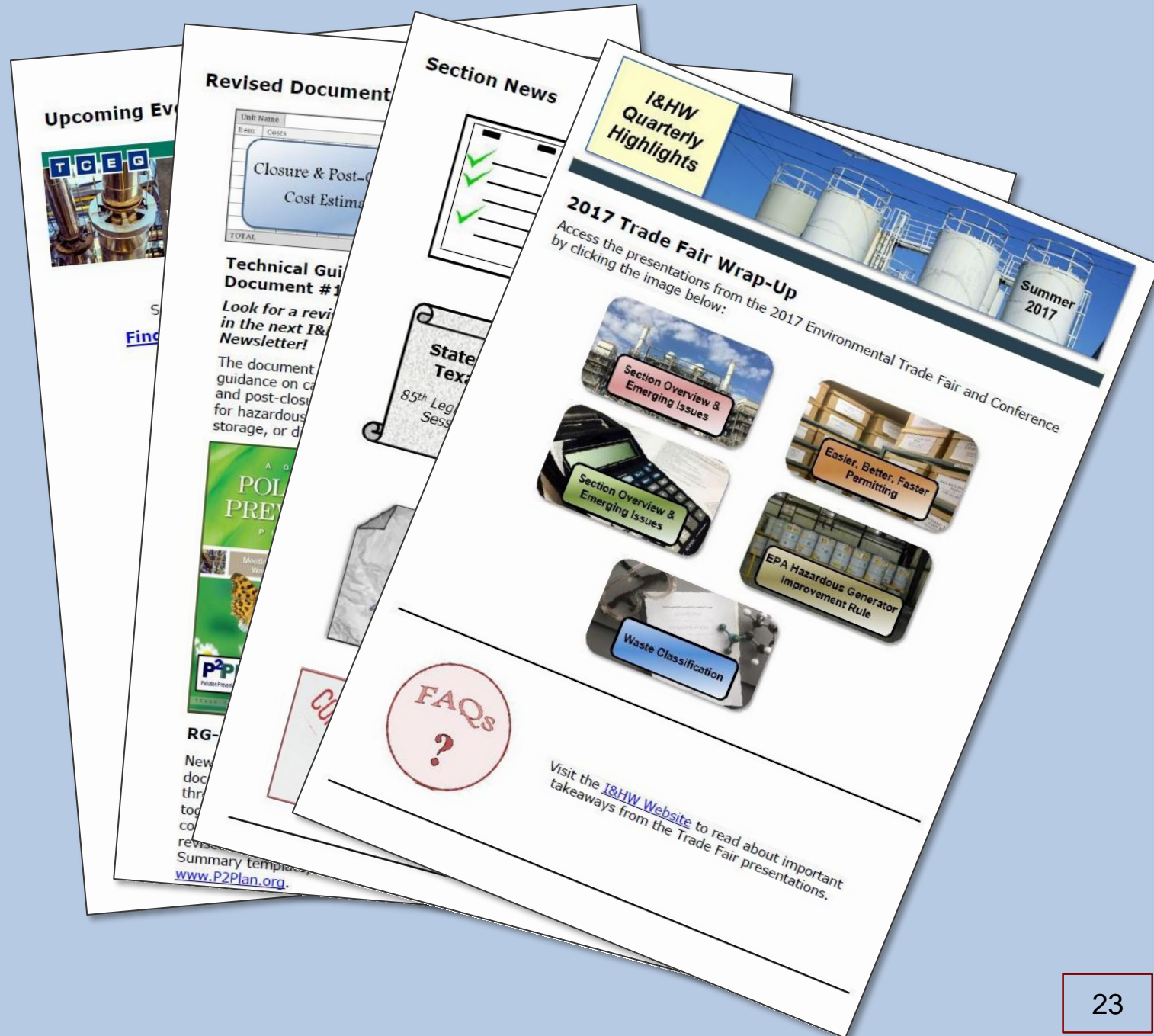
- Risk Assessment
  - Evaluated all lines in Part B
  - Risk grading in 4 areas including technical complexity, risk to human health & the environment
- 2020 Workload Reduction Planning
- Strategy Planning
- Internal electronic sign off



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# How to Contact Us

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