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
<table>
<thead>
<tr>
<th>Items Processed &amp; Reviewed</th>
<th>FY16 Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Audits</td>
<td>557</td>
</tr>
<tr>
<td>Recycling Activity Notifications</td>
<td>118</td>
</tr>
<tr>
<td>DSW &amp; HSM Exclusions</td>
<td>11</td>
</tr>
<tr>
<td>QA/QC Data Sets</td>
<td>44</td>
</tr>
</tbody>
</table>
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
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
Sign Up for GovDelivery

Receive the I&HW Quarterly update, and notification of IHW forms, rule, guidance, and procedure updates:

http://www.tceq.texas.gov/permitting/waste_permits/ihw_permits/signupihw
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