

Guide for TBLs Submittal and Pretreatment Program Package

The publicly owned treatment works (POTW) should submit the technically based local limits (TBLs) package to the Approval Authority (*i.e.* U.S. Environmental Protection Agency (EPA) or NPDES delegated State) as part of the entire pretreatment program modifications submittal. Please note that for development of a new pretreatment program the permit requires submittal of the various components as separate activities.

The complete pretreatment program submittal must include, at a minimum, the following information in draft form according to 40 CFR §§403.8(f)(1)-(6) and 403.9(b)(1)-(4):

- Legal Authority (*i.e.* Ordinance) language (showing what will be changed) and any applicable multijurisdictional customer agreements/contracts and ordinances
- Enforcement Response Plan (ERP) / Enforcement Response Guide (ERG)
- Pretreatment program standard operating procedures for the implementation of the pretreatment program, including forms (*i.e.* inspection, permit application, permit, permit fact sheet, samples of enforcement communications, sampling documentation, data management)
- Updated industrial waste survey inventory, in tabular form
- Resolution of funding/endorsement from the governmental bodies, including multijurisdictional customers, responsible for funding the program
- The city official's or attorney's statement confirming that the proposed submittal meets the requirements of 40 CFR Part 403, State, and local law. (For a sample statement, see Appendix K in EPA's *Guidance Manual for POTW Pretreatment Program Development*, October 1983.)
- TBLs package
The package must contain sufficient information to allow a determination of the adequacy of data collection and analyses. At a minimum, the following information must be submitted.

The Sampling Plan: Before the Pollutants of Concern Sampling Events

- The sampling plan should be submitted to the Approval Authority prior to conducting the comprehensive six-month or six-day sampling events (seven-day sampling event for those submittals where we received notification to modify after July 2004). The sampling plan should explain how the sampling events will be conducted.
- A schematic showing the layout for each wastewater treatment plant (WWTP), including all treatment units, narrative designations of the treatment processes, sampling locations for influent, effluent, and sludge.
- The initial influent pollutant scan which must include all of the EPA's priority pollutants (40 CFR Part 122 Appendix D, Tables II, III, and if applicable Table IV) and any other pollutants regulated by the state (Texas Surface Water Quality Standards, 30 TAC Chapter 307). Statement that 40 CFR Part 136 methods have been used for the influent scan. Submit

the chain-of-custodies and Quality Assurance/Quality Control for this sampling event and any other data or information used to identify the Pollutants of Concern.

- A list of the pollutants of concern (POCs) for which sampling will be conducted and local limits will be developed. Statement that 40 CFR Part 136 methods will be used for the influent and effluent six-month or six-day sampling events (seven-day sampling event for those submittals where we received notification to modify after July 2004).
- A detailed explanation of the location and frequency of all sampling events that will be conducted, *i.e.* WWTP influent, effluent, sludge, collection system with only domestic/commercial contributions.
- A statement that the POTW has all chain-of-custody information on-file and that the records will be maintained on-site as long as the current local limits are in effect.

Pollutants of Concern Sampling Events

- The data for all the sampling events (*i.e.* six-day sampling events for influent, effluent, and sludge (seven-day sampling event for those submittals where we received notification to modify after July 2004)) should be compiled and tabulated. Do not submit the chain-of-custodies for these sampling events.
- An explanation must be included concerning why a local limit was not developed for any Pollutant of Concern.
- An explanation must be included of any decisions made that may deviate from the “EPA-Region 6 TBLLs Development Guidance” or EPA national guidance.
- An explanation for all abbreviations used on data sheets and in calculations.
- A copy of the Texas Toxicity Modeling Program (TexTox) report printout used in the TBLLs calculations.
- The calculated local limits and all the information used in the calculations. Include the spreadsheets and/or EPA’s Prelim printouts. If using spreadsheets, submit the electronic copy with the substantial program modification package or have it available in case the Approval Authority requests it.
- A complete hand calculation for one metal parameter demonstrating step-by-step how the local limit was developed.
- A description of the allocation method employed.

For non-uniform methods of allocation (includes mass allocation situations, where certain industrial flows may not be included for a pollutant in the calculations, etc.), the POTW must include:

- A listing of each industrial user and the mass of each pollutant of concern that will

be allocated to each user.

- A description of the tracking/methodology to be used to demonstrate that maximum allowable industrial loadings are not exceeded.
- The items listed above must be submitted to the Approval Authority by the authorized signatory official for the POTW.
- The TBLLs certification statement signed by the authorized signatory official.
- Any other documentation as requested by the TPDES permit or Approval Authority.

This information will be public noticed for comment with the ordinance submittal and will become part of the approved program upon approval by the Approval Authority.

All pretreatment program modifications, substantial and non-substantial, must be submitted to the Approval Authority in accordance with 40 CFR §403.18 and once approved become enforceable conditions of the POTW's NPDES/TPDES permit.