

TPDES Pretreatment Program Stakeholder Group
March 26, 2004
Meeting Summary

Welcome - Chris Linendoll, Wastewater Permitting Section Manager

Introductions - Steve Ligon, Storm Water & Pretreatment Team Leader

Summary of Comments from October and December 2002 Stakeholder Meetings - Jill Russell (Handout #1)

- Stakeholders agree that consistent policies and guidance for Texas pretreatment programs should be developed
- Programs should be provided more flexibility that will ensure program goals are achieved in a cost effective and proactive manner
- Subcommittee groups might be formed to address more technical issues
- The TCEQ should evaluate local programs not statewide without a written policy
- The enforcement of local limits is designed to protect adequately local Publicly Owned Treatment Works (POTW) and its workers
- The TCEQ policy guidance would only apply to the uniform application of local limits
- The EPA is going to be evaluating programs by performance based measurements

Next Steps - Rebecca Villaba

- EPA local limits guidance manual to revise the 1987 version has been redrafted by EPA regional technical staff across the country
- Currently being reviewed by EPA management - may be final in May
- May address enforcement and implementation of local limits
- Issues:
 - ▶ How to delist parameters?
 - ▶ EPA has asked to hold off on this because identifying pollutants not present in the 40 CFR Part 403
 - ▶ Streamlining regulations
 - ▶ EPA has been asked to provide training on the streamlining changes
 - ▶ TCEQ waiting on final EPA regulations so Texas programs are not more stringent

Quality Assurance (QA) and Quality Control (QC) Protocols for Sampling - Jill Russell (Handouts #2, #3, #4, and #5)

- The QA/QC Sampling procedures for NPDES Pretreatment Program are developed to :
 - ▶ Verify quality of data collected
 - ▶ Support compliance and enforcement actions
 - ▶ Support local limits development
 - ▶ Support industrial user (IU) permit development
- Quality Assurance is a tool for maintaining a specified level of quality in the measurement, documentation, and interpretation of sampling data
- Quality Assurance programs:
 - ▶ Ensure that the results are adequate for the intended purpose

- ▶ Increase the confidence in the validity of the reported analytical data
- ▶ Develop specific functions to assure the quality of measurement of data
- Functions of Quality Assurance
 - ▶ Monitor and evaluate the reliability of data results
 - ▶ Control quality of data to meet program requirement
- Quality Control is the process of carrying out procedures in the Quality Assurance Program:
 - ▶ Measure prescribed standards of performance
 - ▶ Record equipment specifications and environmental conditions in log book
 - ▶ Complete various types of QC samples
- Several types of Quality Control Samples
 - ▶ Duplicate samples
 - ▶ Equipment blanks
 - ▶ Field Blank
 - ▶ Preservation Blank
- Overall success of a sampling program depends on its ability to produce valid data through the use of accepted sampling procedures and to substantiate such data through documentation.

Workgroup Discussion - Identify and prioritize items to be addressed regarding the QA/QC protocols for sampling.

- Quality Management Plan - Explain how to deal/describe with field blanks (update no later than 2 yrs)
- Two samples not feasible
- Change tubing
- Cost associated with QA/QC Program
- Implementation schedule (budget)
- Standard Operating Procedures (SOPs) updated no later than 2 yrs.
- QA/QC and analyses varies per POTW
- Field sampling QC vary per parameter and concentration
- Generally meeting field QC except for equipment duplicate - 5% minimum frequency being met
- Levels of QC protocols vary between programs
- While basic QC requirements such as laboratory blanks and duplicates may be uniform, individual POTWs need flexibility to determine additional QC requirements based on:
 - ▶ POTW's need for court enforcement
 - ▶ POTW's Pretreatment program effectiveness
 - ▶ Costs of additional sampling vs. program costs
 - ▶ Might be best to include specific QA plans as part of POTW Enforcement Response Plan

Workgroups Present Proposals for the QA/QC protocols for sampling-

- Workgroup agrees that current guidance is appropriate, but escalated QA/QC may be needed when conditions warrant
- Documentation, Chain of Custody (COC)
- Each pretreatment program set up minimum guidelines

- Escalating QA/enforcement program for problem industries
- Make field sampling QC industry specific
- Calibration of instruments
- Field logs - Reviewed by QA Manager
- Preservatives
- Annual inspection of laboratory performing all testing

HB 1979 - David James (Handouts #6 and #7)

- Targeted for municipalities that do not ordinarily have grease management standards in place
- Grease traps can also be referred to as grease interceptors
- Plumbing and Drain Institute has a website that has lots of information (PDI.com)
- Larger cities have oil and grease ordinances
- Should keep a log for cleaning
- Trip tickets must be used as a record by persons who collect and transport waste

Action Items for QA/QC Protocols for Sampling - Jill Russell

- Should there be a minimum set of QA/QC standards?
- Bring proposals to next meeting
- Minimum guidelines that escalate
- Elements for POTWs to incorporate into their QA program
- Next meeting for workgroup might possibly be late June

Pretreatment Stakeholder Meeting
March 26, 2004
Austin, Texas
Attendee List

Steve Stubbs	TCEQ
Martin Miller	SAWS
Lonnie Bowen	City of Amarillo
Cynthia Belvin	Trinity River Authority
Vera Y. Spruill	City of Irving
Albert Lawrence	City of Irving
David James	TCEQ-SBEA
Richard Smith	TCEQ/SBEA/PPIA
Donna Fossum	San Antonio Water System
Ted Neumann	Brazos River Authority
Gloria Broussard	LCRA
Julie Winchell	City of Cleburne
Yilma Zerihun	City of Dallas
Lisa McClain	TCEQ
Daniel Burke	TCEQ Policy & Regs.
Gary Gilliland	City of Grand Prairie
Mark Shell	City of Corpus Christi
Terry G. Mills	Envirodyne Lab, Inc.
Morgan Dadgostar	City of Dallas
Lanelle Belecek	City of Victoria
Sandra Snyder	City of Victoria
Brad Castleberry	Lloyd Gosselink
Steve Durchin	IWPP
David Brock	City of Tyler
Janet Sims	Alan Plummer Assoc. Inc.
Scott Baggett	City of Longview
Tim Williford	TCEQ
Brian Swierc	TCEQ
Jill Russell	TCEQ
Jan Sills	TCEQ
Joy Schultz	TCEQ
Michael Neberman	COA
Chris Linendoll	TCEQ
Paul Jenson	PBS & J
Leonard Levine	GCUDT
Steve Gibson	TCEQ
ND Kaku	TCEQ
David Houston	City of Austin
Buster Fichera	City of Fort Worth

Antonio M. Gonzales
Steve Ligon
Al Capps
Pat Akin
Bill Cyrus
Brooke Noack
Joe Burgess
Lee Davis
Lisa M. White
Becky Bernard

City of Austin
TCEQ
TCEQ
City of Arlington
TRA
NTMWD
City of Waco
City of Dallas
Texarkana Water Utilities
LES