

TPDES Pretreatment Program Stakeholder Group
October 7, 2002
Meeting Summary

Opening Remarks -Mike Cowan

- Requested Stakeholders have a dialogue
- Would like to have a better exchange of ideas that are within TCEQ's limitations
- Need input on how to structure the meeting
- Need ideas & issues for the next meeting

Welcome - L'Oreal Stepney

- Currently dealing with several issues in Water Quality Division, such as, permitting time frame, storm water, pretreatment, etc.
- Looking forward to open dialogue with stakeholders

Introductions/Purpose & Goal of Meeting - Jill Russell

- Introduced Pretreatment Staff
- EPA Region 6 has not issued any specific guidance in writing for the implementation and enforcement of technically based local limits
- Opened the meeting for dialogue and items for discussion on any TPDES Pretreatment Program Issues
- Will prioritize topics in addition to Technically Based Local Limits (TBLL)

Questions and Answers on the TPDES Pretreatment Program and Local Limits - Jill Russell

- The following are topics suggested for discussion by stakeholders:
 - Identify areas that are different between EPA & TCEQ
 - Regulatory authority for sampling TBLL's at each site
 - Need & cost to sample for TBLL's at each site
 - Best benefit for the dollar between programs
 - Speed of program modifications being reviewed & approved
 - Involvement in Sanitary Sewer Overflows (SSOs) - who is going to take control, Pretreatment , Water Quality, also Capacity, Management, Operation and Maintenance (CMOM)
 - Input/Effect of compliance history on Pretreatment
 - How to address contributing industries - local limits approval
 - Permit limits (TPDES) based on one sampling event - Minimum analytical level (MAL) issue
 - Field QA/QC sampling protocols
 - EPA/TCEQ Enforcement Task Force - who are they and what do they do
 - Criteria for Pretreatment Program Development - Requirements
 - Local limits for package plants
 - Expectations for control authorities (CAs)
 - Permit backlogs

- Impact of Metal Products and Machinery (MP&M)
- Glycol waste from airports - local limits & control
- Delisting of pollutants from industrial user self monitoring and potentially compliance monitoring conducted by the CA

Overview of Pretreatment Program Rules & Regulations - Rebecca Villalba

- Pretreatment Standards & Requirements - (See handout of presentation)
- Local limits set by CA - site specific
- Categorical standards set by EPA
- Regulatory citations under 40 CFR, Section 403.5(c) -state that all POTWs required to have an approved Pretreatment Program must develop, implement, and effectively enforce local limits - TCEQ has adopted them by reference
- Local limits are Pretreatment standards and must be enforced as such
- EPA Headquarters and Region 6 has criteria for developing TBLs
- TCEQ can never be less stringent than EPA
- MOA with EPA says TCEQ will require POTWs to develop TBLs
- How to review an approved Pretreatment Program & several other guidance documents available on the internet web from EPA's website

POTW's Implementation and Enforcement of Local Limits - Jill Russell

- Guidance documents provide information on implementing & enforcing local limits - discussion today based on uniform allocation - (See handout of presentation)
- SIUs must have discharge permit from CA
- Industries are required to be in compliance
- Three sections of a permit are:
 - Compliance with Pretreatment Standards
 - Effluent limits
 - Self-monitoring requirements
- TCEQ's Proposal:
 - A permit writer needs to include in the significant industrial user (SIU) permit:
 - A statement requiring compliance with all TBLs contained in the legal authority
 - CA may de-list certain local limits based on data and other information
 - Will need statement that SIU continue to be responsible for compliance with all adopted TBLs
 - Fact Sheets - documentation kept with permit
- Self-Monitoring - permit writer reviews
 - SIU permit application
 - Analytical data
 - List of raw materials on-site
- Permit writer must determine applicable local, state & federal standards that apply to the permittee
- Control Authority must monitor at least once per year for all adopted TBL's at each SIU
Suggest Stakeholders look at the regulations, review the TCEQ Proposal and provide

feedback

- Delisted - Needs to provide adequate data which documents that the pollutant is absent
- Additional topics of concern & questions submitted by the Stakeholders were as follows:
 - Permit Limit & Ordinance Limit - If there is a violation is it counted twice?
 - Departure from EPA audits
 - Why sample the industry when there is no history of problems
 - Economic Impact - Cost
 - Why did the TCEQ pick Maximum allowable headworks loading (MAHL)
 - Parameters in drinking water in background concentrations
 - Time it takes to modify an Ordinance
 - Testing for something that is not there
 - Publication in newspapers
 - Inspections - Independent information to verify process changes
 - Plant interference/pass through numbers
 - Normal variation in background of wastewater
 - Approval mechanisms, public process
 - Consistency for CA enforcement
 - Task force to review the TCEQ proposal
 - Implementation time lines
 - Multi jurisdictional Partners
 - Individual pollutants of concern

Main topics suggested for discussion by stakeholders - Jill Russell

- Speed of program modifications depends on size & complexity of program
- TPDES permit backlog - compliance history for every applicant has to be reviewed
- Priority I permits should be issued by December 31, 2002.
- Compliance History - Enforcement has formula for rating facilities
- Ratings will be posted on internet eventually
- Enforcement Task Force - EPA lead on task force, can decide who it will investigate - investigate both civil & criminal intent
- Impact of MP&M (metal products & machinery) - not final yet

Small Groups Report Back and Open Discussion on Policy Issues and Ideas - Jill Russell & Rebecca Villalba

- The questions from TCEQ Proposal are:
 - Do all of the adopted TBLLs need to be included in the compliance section of the SIU permits?
 - What information should the Control Authority provide to “delist” a pollutant from the self-monitoring requirements section of an individual SIU permit?
 - What parameters should be tested for once per year by the Control Authority in the effluent from each Significant Industrial User? If a determination is made that particular pollutants may be delisted from the self-monitoring section of an individual SIU permit, does the Control Authority need to continue sampling for those pollutants?

- The following are topics discussed by each small group:
- Group #1
 - Include all TBLLs in “Compliance Sect.” of IU Permits? - No - 1 , Yes - 5, Monitored vs. Effluent Limits? Ref. To Ordinance -
 - “De-List” Criteria [Omit from IU self monitoring] - Below MAL - Yes, Below Background (domestic/commercial), “Detected - Use best professional judgement (BPJ) - Information needed
 - Guidance data - (Trade Info)
 - Sampling = less than 6? Just (1) Baseline
 - If present > reasonable # then followup
 - Inspection/audit
 - Application
 - Detect TBLL
 - Need better term for delisting - “Self monitoring requirements”
 - Constituents to be tested? By IU? By CA? (1 yr of SIU)
 - Sample
 - All TBLLs
 - All Monitoring parameters
 - Frequency = 1/perm term
- Group #2
 - All TBLLs in Compliance Section?
 - Statement referencing TBLLs in Ordinance is OK - only list applicable TBLLs to be sampled as part of self monitoring
 - Info needed to de-list pollutant from self monitoring?
 - Inspection
 - Application
 - MSDS
 - Knowledge of process (BPJ)
 - Annual CA sampling of de-listed pollutants? Yes
 - Any addition sampling, given proper QA/QC - What is additional cost to City/IU?
- Group #3
 - Answer to question #1 - in TCEQ Proposal - Yes
 - Sampling frequency based on flow volumes
 - Develop an action level tied to influent/effluent POTW sampling
- Group #4
 - Sampling Frequency - Frequency should be listed - yes
 - All parameters listed (some believe) CA should use their judgement (Narrative Statement)
 - Must be able to justify
 - Should be able to just reference ordinance
 - De-listing process not necessary for each permit renewal
 - Head works data - Not in wastewater treatment plant effluent - not a concern
 - Local Limits sampled for once during each permit cycle (3 year maximum due to records retention requirements) - at time of permit renewal

- All Stakeholder comments will be compiled - draft will be rewritten (See Attached Draft)
- Will meet with Stakeholders again
- May take several meetings to get a final draft

Next Meeting - Thursday, 10:00 a.m. - 4:00 p.m. - December 12, 2002 - Conf. Rm. 2210

Items for Follow up and Future Meetings - Jill Russell

- QA/QC for sampling
- MAHLs
- Implementation Procedures - 1631 mercury method added to list
- SSOs & CMON
- Environmental Management Systems (EMS)
- Compliance History

**TPDES Pretreatment Program Stakeholder Group
List of Attendees
October 7, 2002**

Jim Siddall	City of Irving
Bill Cyrus	TRA
Cynthia Belvin	TRA
Joe Duke	NTMWD
Robert Martinez	SAWS
Mark Shell	City of Corpus Christi
Richard Statser	NTOPP
Lisa M. White	Texarkana Water Utilities
Chris Hughes	DFW International Airport
Ron Cornmesser	U.S. Filter Operating Services
Sebastian "Buster" Fichera	City of Ft. Worth Water
Mike Tomme	LCRA
Gary Gilliland	City of Grand Prairie
Keith Bonds	City of Longview
Mike Cowan	TCEQ
Angela Bullock	City of Arlington
Scott Walsh	Hyperion International Tech.
Antonio M. Canales	City of Austin
Ervin Thomas	TCC
Vera Y. Spruill	City of Irving
Willie Scalen	Gulf Coast Waste Disposal Authority
Jerry Allen	NTMWD
Janet Sims	Alan Plummer Assoc. Inc.
Martin Miller	San Antonio Water System
Bill McCullough	City of Denton
Clifford Bealser	City of Corpus Christi
Rob Fuentes	Brazos River Authority
Jim Cummings	City of Grand Prairie
Jan Sills	TCEQ
Michael Neberman	City of Austin
Pius Obioha	TCEQ - R-12
Gary Kasner	City of Bryan
Pixie Wetmore	TCEQ - R-4
Scott Baggett	City of Longview
Robert Martinez	TCEQ
Michael Bloom	PBS&J
Paul Jensen	PBS&J
Grady Coomes	City of Dallas
Lauren Kalisek	Lloyd Gosselink
Alvin Black	City of Farmers Branch

David Weaver
Gary Fogarty
Steve Nutter
Nancy Baier
Al Ouchie
David James
Lanelle Belicek
Bill Young

GBRA
TCEQ - Houston
TCEQ - Ft. Worth
TCEQ
Hyperion International
TCEQ - SBEA
City of Victoria
GBRA