

TPDES Pretreatment Program Stakeholder Group
December 12, 2002
Meeting Summary

Welcome & Introductions - Jill Russell

Opening Remarks - L'Oreal Stepney

- Looking forward to open dialogue with stakeholders
- Agenda Overview

Review of Stakeholder 10-7-02 Comments - Rebecca Villalba

- Local limits protect collection system
- Fact Sheet needs to be kept for the life of permit
- Permit can be for 5 years, sampling cycle no longer than 3 years
- Compliance with Technically Based Local Limits (TBLLs) and Effluent Limits - *TCEQ's Proposal*
 - The Control Authority (CA) may delist TBLLs for the life of the significant industrial user (SIU) permit or until processes, products, source materials or storage of materials at the facility have changed
 - However, the SIU continues to be responsible for compliance with all of the adopted TBLLs
- TCEQ's Proposal - Fact Sheets
 - Document how the numerical limits of specific pollutants were derived
 - Provide information for the basis of delisting any TBLL
 - Need to be kept with the permit until permit expiration
- **Question 1** - Do all of the adopted TBLLs need to be included in the compliance section of the SIU permit? *Stakeholder Group Answers* were as follows:
 - Group 1 - Yes
 - Group 2 - Yes to compliance by making reference to the ordinance; Only list applicable TBLLs as effluent limits and as a part of self-monitoring
 - Group 3 - Yes
 - Group 4 - Yes to compliance by making reference to the ordinance; CA should use their judgement with justification (narrative statement)
- Self-Monitoring of TBLLs - *TCEQ's Proposal*
 - The CA may delist a TBLL from the self-monitoring requirements contained in an SIU's permit - the section that is in the permit
 - Based on adequate data to demonstrate that the raw materials used, other pollutants created, discharged or stored by an SIU are known to be absent and not likely to contain pollutants regulated as TBLLs
 - When the CA delists a TBLL the following information needs to be reviewed:
 - Permit applications
 - Baseline monitoring report (categorical only)

- 90-Day compliance reports (categorical only)
- Material Safety Data Sheets (MSDS)
- Monitoring data - demonstrating concentrations below minimum analytical levels (MALs)
- The CA needs to verify this information through documented inspections
- Minimum requirements for compliance monitoring data reviewed:
 - Monthly sampling over six consecutive months or annual sampling over three years
 - Collected with sufficient care to be defensible in enforcement proceedings or judicial actions
 - Information related to the TBLL that has been delisted needs to be kept for the life of the permit
 - Self-monitoring data may be used
- **Question 2 - TCEQ's Proposal** - What information should the CA provide to “delist” a pollutant from the self-monitoring requirements section of an individual SIU permit?
Stakeholder Group Answers were as follows:
 - Group 1 - Yes - If below MAL & if below background (but detected), use best professional judgement (BPJ) considering the following:
 - Guidance data, trade information
 - Sampling equals less than 6? Just 1 equals baseline
 - If present at a concentration greater than a reasonable number, then follow-up
 - Inspection/audit
 - Application
 - Detected concentration is less than the TBLL
 - If below background (but detected), use BPJ considering the following:
 - Safety factor
 - Potable water
 - Material Safety Data Sheets (MSDS)
 - Water Quality Standards
 - Group 2 - Yes, but consider the following information to delist a TBLL
 - Inspection
 - Application
 - MSDS
 - Knowledge of process (BPJ)
 - Any additional sampling given proper quality assurance/quality control (QA/QC)?
 - What is additional cost to CA/SIU?
 - Group 3 - Yes
 - Consider flow volumes to determine sampling frequency
 - Develop action level tied to POTW influent and effluent sampling
 - Group 4 - Must be able to justify
 - No need to repeat the process to omit a TBLL with each permit

- renewal
 - Headworks data - if the TBLL is not detected in the POTW influent, then it is not a concern
- Compliance Monitoring of TBLLs - *TCEQ Proposal*
 - The CA shall sample and analyze each SIU for all of the pollutants adopted as TBLLs once per year, regardless of the parameters listed in the effluent limits and self-monitoring requirements sections of the SIU discharge permit
 - If a CA determines that a particular pollutant may be delisted from the SIU self-monitoring requirements
 - Then the CA needs to continue sampling for that pollutant (and all other adopted TBLLs) at the end-of-pipe of each SIU at least once per year
 - The CA may summarize the documentation for delisting a pollutant, including the historical data, inspection results, MSDS review, and self-monitoring data, in the SIU's permit fact sheet prior to permit issuance
 - The fact sheet needs to be kept for the life of the permit
 - For those TBLLs implemented through individual SIU permits, the CA shall sample and analyze each SIU:
 - To determine compliance with permitted effluent limits
 - And/or to verify that concentrations of those TBLLs in the effluent are below background levels
- **Question 3 - *TCEQ Proposal*** - What parameters should be tested for once/year by the CA in the effluent from each SIU? If a determination is made that particular pollutants may be delisted from the self-monitoring section of an SIU's permit, does the CA need to continue sampling for those pollutants? *Stakeholder Group Answers* were as follows:
 - Group 1
 - Sample for all TBLLs
 - Sample for all monitoring parameters
 - CA frequency, once per year
 - Frequency, once per permit term for delisted TBLLs - by whom?
 - Group 2
 - Yes to annual CA sampling for delisted [and permitted] TBLLs
 - See answer above
 - Group 3
 - No answer provided???
 - Consider flow volumes to determine sampling frequency
 - Develop action level tied to POTW influent and effluent sampling
 - Group 4
 - No answer provided???
 - TBLLs that have been delisted from the permit need to be sampled for once during each permit cycle (no longer than 3 years) at the time of permit renewal

Identify Common Points/Issues from Stakeholders - Jill Russell, Discussion Leader

- Compliance section of permit - what industry is responsible for
- Compliance section of permit should have some flexibility

- Provide the section with TBLLs in permit
- Compliance with all TBLLs
- May be obligated to give SIUs a copy of ordinance
- Want to make sure that industry is as informed as possible
- Add to draft proposal that it is about TBLLs based on uniform concentration allocations
- Establishing self-monitoring - needs to be changed to:
 - Documented method of determining self-monitoring
 - Method at CA's discretion
- Proposal - add statement in permit to be in compliance with TBLLs
- Need to have an updated ordinance
- Delisting or removal of pollutants is talking about self-monitoring
- Would like to limit discussion to uniform allocation
- Will discuss development of TBLLs after the proposal is out
- Can use historical data for existing industry for delisting
- New industry can use data for first 6 months
- Can use self-monitoring data
- Use another term for delisting, such as:
 - Elimination of monitoring requirements
 - Establish which TBLLS are not listed
- Historical data can be used as debiting criteria

Additional Comments & Ideas - Jill Russell, Discussion Leader

- In establishing Self-Monitoring Requirements - Minimum data to be reviewed
- Monthly sampling over 6 consecutive months - for new industries
- Annual sampling over 3 years
- TCEQ will consider self-monitoring data in addition to the above
- CA monitoring is a way to collect information independent of what industry provides to you
- Industries are well aware of TBLLS
- Self-Monitoring is every 6 months
- Compliance monitoring is once a year according to EPA
- Why change it if it's already working
- It will be more restrictive - more costly to industries
- CA's want to develop self-monitoring requirements that are specific to certain industries
- CA monitoring - not in self-monitoring
 - Once per permit cycle
 - Talk about levels - minimum analytical levels (MALS)

Identify Items in the Proposal - Jill Russell, Discussion Leader

- Compliance Aspects of TBLLS
 - Action Item: Self-monitoring procedures, protocols to establish parameters to TCEQ by January 31, 2003

- Action Item: Language for compliance monitoring of TBLLS where there is no self-monitoring requirements to TCEQ by January 31, 2003
- Documentation provided by the SIU
- Initial priority pollutant scan for those pollutants found above a certain level - 4 retests
- Categorical IUs - parameters listed in the category cannot be removed
- Documentation from Industrial groups

Discuss Alternatives/Next Steps - Jill Russell, Discussion Leader

- CA monitoring - Sample once per permit cycle
- CA may make case-by-case decisions
- Sample once every 3 years - shows independent monitoring for 3 years
- Sampling should be representative
- Goal is to set out a baseline - have something in writing
- Proposal is geared toward uniform allocation
- Have some consensus on how they will be implemented
- Need to define a clear goal of the meeting & they are:
 - Determining Local limits & allocations
 - Determining self-monitoring
 - Determining Control Authority monitoring
- Mission statement is to come up with a document that provides information & implementation of enforcement of TBLLS, guidance of enforcement of TBLLS, & detailed documents

SOS & CMOS Overview - David James

- An SO is an uncontrolled & unauthorized release of raw sewage from a sanitary sewer
- SOS should be prevented for the following reasons:
 - Protect Public Health
 - Protect Water Quality
 - Required by Clean Water Act - NODES/TIDES permits
 - Protect Public Safety
 - Save the community from expensive emergency responses & property damage costs
- Preliminary findings - Causes of SOS are the following:
 - Blockages
 - Wet weather
 - Mechanical power failure
 - Unknown
 - Vandalism
- Types of Blockages
 - Grease - account for 50% of blockages of sewer lines
 - Wet weather - 21%
 - Grease and roots
 - Other & unknown
- Biggest causes of blockages are fats, oils & grease

- Cost of manhole overflows - SO - \$5 - \$10 thousand dollars for every event
- EPA Proposed Rule to Reduce SOS - Revisions to NODES Permit Regulations:
 - Capacity Assurance, Management, Operation, and Maintenance Program (CMOS)
 - Notify Public & Health Authorities
 - Prohibition of Overflows
 - Expand Permit Coverage to Satellite Systems
- EPA withdrew from publication - Jan. 2001 - is rewriting in 2002 - may publish in Spring, 2003
- What might it cost municipalities?
 - \$93.5 million - \$126.5 million each year
 - \$ 6, 000 per year - (collection system serving 7,500)
 - Costs don't include capital outlay
 - For additional information, visit:
http://cfpub.epa.gov/npdes/home.cfm?program_id=4
- Capacity Management Operations and Maintenance (CMOS) Program - is a management system
 - Evaluate & ensure proper functioning & capacity of sewer systems
 - Streamlined provisions for small communities
 - Six major requirements are:
 - General performance standards
 - CMOS program documentation
 - Overflow Response Plan
 - System evaluation and capacity assurance plan
 - Program audit
 - Communication
- Implementation
 - EPA recommends states begin implementation of "SO Standard Conditions" as soon as published in Federal Register
 - "SO Standard Conditions" should be added to permits as part of regular renewal cycle
- EPA Enforcement Strategy
 - Developing inventory of all collection systems
 - Goal of addressing 20% of priority systems
 - Providing compliance assistance for small communities
- SO costs are spread across many departments, such as, Mayor/City Manager's Office & legal, collection system, storm water, pretreatment, emergency responders, water dept., POT. & others
- SO reduction practices
 - Grease discharge control strategies
 - Educate the public
- What are the grease control program costs & payback?
 - Total SO related costs to municipality: 50 events/yr @\$5,000/event = \$250,000/yr
 - Municipality implements grease control program for about \$50,000/yr
 - From 50 to 10 SO events/yr (80% reduction) = 10 events/yr @ \$5,000/yr =

\$50,000

- Program spends \$50,000/yr to avoid \$200,000/yr - Payback in 4 months
- Locate the problem areas
- Identify the cause or source of the problem to eliminate or fix
- Know what the problem costs now to manage
- Identify & prioritize options, estimate costs, and anticipated results
- Do what you can when you can

Texarkana Pretreatment Program - Lisa White

- Manpower & cost of trucks - \$90,000 a year cost savings
- Twin city - exchange information with two county's sanitarians
- Work with TCEQ waste team
- Require anyone who transports to have license in Texas
- Recommended not tying the grease control program to the pretreatment program because modifications would be cumbersome.
- All commercial entities have to fill out a "Request for Nondomestic Connection" or get no water
- Texarkana Water Utilities cannot provide water service until the pretreatment and/or backflow prevention devices are installed and inspected
- Application for Wastewater discharge permit may be required
- Use brochures to inform public
- Just started working with construction inspections
- Restaurants & new owners are given "Typical Grease Trap" page & copy of ordinance
- Always require a Sampling Manhole
- Notice of deficiency - This is a preliminary enforcement action, a requirement for corrective action.

Questions - Jill Russell

- Compliance Aspects - will establish and/or statements
- Establishing self-monitoring procedures
- Get together in small groups - would like to receive comments by end of January 31, 2003
- Comments should be not too prescriptive - TCEQ will review comments by March, 2003
- Compliance monitoring - another action item - what are some guidelines
- Limit uniform allocation - submit to Pretreatment staff by January 31, 2003
- Will prepare second proposal

Next Meeting - End of March, 2003 (Possibly)

**TPDES Pretreatment Program Stakeholder Group
List of Attendees
December 12, 2002**

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|-----------------------|--------------------------------------|
| Vera Y Spruill | City of Irving |
| Albert E. Lawrence | City of Irving |
| Charles McDonald | City of Wichita Falls |
| Bill Cyrus | TRA |
| Janet Sims | Alan Plummer Assoc., Inc. |
| David Houston | City of Austin |
| Scott Baggett | City of Longview |
| Jerry Allen | NTMWD |
| Mike Marin | Freese and Nichols, Inc. |
| David Brock | City of Tyler |
| Steve Durchin | IWPP |
| Leonard Levine | GCWDA |
| Ron Cornmesser | US Filter |
| Melvin P. Solomon | City of Conroe |
| Paul Jensen | PBS&J |
| Grady Coomes | City of Dallas |
| Jan Sills | TCEQ |
| Mike Tomme | LCRA |
| Pixie Wetmore | TCEQ |
| Patrick Akin | City of Arlington |
| Cynthia Belvin | TRA |
| Gary Gilliland | City of Grand Prairie |
| Jim Cummings | City of Grand Prairie |
| Selina Martin | City of Longview |
| Daniel Pyeatt | North Texas Municipal Water District |
| Mark Kirby | City of Garland |
| Michael Bloom | PBS&J |
| Martin Miller | San Antonio Water System |
| Gary Fogarty | TCEQ-Houston Office |
| Antonio M. Canales | City of Austin |
| Robert Martinez | TCEQ |
| Rob Fuentes | BRA |
| Lisa White | Texakana Water Utilities |
| Lanelle Belicek | City of Victoria |
| Lonnie Bowen | City of Amarillo |
| Mark Shell | City of Corpus Christi |
| Buster Fichera | City of Ft. Worth |
| David James | TCEQ |
| Joe Burgess | City of Waco |
| Louise Daniels Barnes | City of Dallas |