Summary of Activities 1 - 7 for
Developing a Pretreatment Program

Activity 1. The permittee will need to perform a detailed Industrial User Survey. Industrial users will be asked to provide the types and quantities of pollutants they are contributing to the POTW. This information is due 2 months after the effective date of the TPDES permit. Unless the TCEQ notifies the POTW within 60 days that they are not required to continue the development of the pretreatment program, they must continue to Step 2.

Activity 2. The POTW must submit a design of a sampling, inspection and reporting program which fulfills the requirements of 40 CFR Part 403.8 and 403.12. This information is due 4 months after the effective date of the notification to develop a pretreatment program.

There is an example of an industrial user inspection checklist in EPA's Industrial Users Inspection and Sampling Manual for POTWs. The POTW does not have to use this format but the main areas needing to be inspected and the types of information needing to be documented should be included on their checklist.

The quality assurance/quality control (QA/QC) program should follow the elements found in the above referenced inspection and sampling manual. More detailed QA/QC sampling information can be found in Chapter 10 of EPA's Handbook for Analytical Quality Control in Water and Wastewater Laboratories.

Activity 3. The POTW must submit an evaluation of the financial programs, revenue sources, equipment and staffing which will be employed to effectively implement the pretreatment program. This information is due 6 months after the effective date of the notification to develop a pretreatment program.

Activity 4. The POTW must submit the results of one 24-hour influent scan. The scan must consist of the 126 priority pollutants and any additional pollutants included in the Texas Surface Water Quality Standards [30 TAC Chapter 307]. This scan serves as the initial scan for the development of TBLLs. From this scan, and from the information obtained in step 1, the POTW is required to determine which industrial users are discharging pollutants which may affect the POTW or passing through the treatment facility. The POTW is also required in this step to quantify the pollutants being discharged by the industrial users (see boilerplate language and ask team leader for guidance) This information is due 6 months from the effective date of the notification to develop a pretreatment program.

Activity 5. The POTW is required to submit to the TCEQ a complete TBLLs package. The local limits must be developed according to "EPA Region 6 Technically Based Local Limits Development Guidance." The TBLL package is due 9 months from the effective date of the notification to develop a pretreatment program.

Activity 6. The POTW must submit the following: a statement that the POTW has the authority to carry out the pretreatment program; a copy of its legal authority; a statement of endorsement by those responsible for supervising and/or funding the program; multi-jurisdictional documents; an enforcement response plan. This information is due 10 months after the effective date of the notification to develop a pretreatment program. When you have determined that activities 1 through 6 are complete, you will need to write the permit signatory a letter stating as such. In this letter you will state that their program is complete and request they pass the program in its entirety through city council.

Activity 7. The POTW must submit a complete program. This will be a compilation of all previously submitting program activities, amended and supplemented as necessary. This information is due 2 months from the date of the notification that activities 1 through 6 are complete.