



Texas Commission on Environmental Quality

Texas Pollution Discharge Elimination System Pretreatment Program Stakeholders' Meeting

January 23, 2020 @ 1 p.m.
Building E, Room 201S

Welcome

Updates from the Last Pretreatment Stakeholders Meeting in September 2019

- TCEQ FAQ for Control Authorities on EPA Dental Amalgam Rule
 - Revisions and new comment period
- TPDES Permit Influent/Effluent Testing Requirements for Pretreatment Programs
- TPDES Permit Language regarding Technically-Based Local Limit Guidance Documents

Plan for Approval of Pending Program Modifications and New Developing Programs

- Streamlining Rule Modifications
- New Developing Programs
- Technically-Based Local Limit Redevelopments
- TDPEs Permit Action Process for all Substantial Modifications

Discussion on EPA Method Update Rule

Regulatory Update: Proposed Federal Revisions to 40 CFR Part 423

Questions/Answers

Announcements

- Next Meeting - Thursday, June 4th, 2020 from 1:00pm - 4:00pm

Adjournment

Pretreatment Stakeholder Group (PSG) website:

https://www.tceq.texas.gov/permitting/wastewater/pretreatment/pretreatment_stakeholder_group.html

All Stakeholder meetings are available by webcast by going to

<https://www.tceq.texas.gov/agency/decisions/agendas/webcasts.html> or at <https://www.youtube.com/user/TCEQNews>

To be added to the TCEQ Pretreatment stakeholder list for future meetings and correspondence, please email your request to WOPret@tceq.texas.gov.

TPDES Pretreatment Program Stakeholders' Meeting Notes / Follow-up Items

TCEQ FAQ for Control Authorities on EPA Dental Amalgam Rule:

The revised FAQ was provided to stakeholders, and new comment period was provided. The TCEQ stated that approved pretreatment programs have discretion in how they would like to enforce against instances of noncompliance with the rule. The TCEQ also stated that any enforcement actions taken against dental offices need to be done accordance with the approved program.

TPDES Permit Influent/Effluent Testing Requirements for Approved Pretreatment Programs:

The TCEQ discussed a recent proposal to remove or reduce sampling requirements for pesticides/organics when historical analytical data indicates the concentrations of these parameters are nondetectable. The TCEQ inquired with EPA about the proposal, and EPA had questions and concerns that the TCEQ will follow up on. As of right now, the current influent/effluent testing requirements for all approved pretreatment programs that receive and treat industrial wastewater contributions will remain the same.

TPDES Permit Language regarding Technically Based Local Limit Guidance Documents:

Stakeholders discussed the differences between the 1993 EPA Region 6 Guidance memo and the 2004 EPA Local Limits Development Guidance manual. The 1993 EPA Region 6 Guidance memo recommends that programs conduct six consecutive days of sampling for initial development of local limits as well as for each subsequent local limit redevelopment. The 2004 EPA Local Limits Development Guidance manual memo recommends that programs conduct seven to fourteen days of consecutive sampling for initial program development only, and it allows for the use of historical data in subsequent local limit redevelopment. The TCEQ has been implementing a hybrid of both of these EPA guidance documents, and some stakeholders prefer the 2004 EPA Local Limit Development Guidance manual over the 1993 EPA Region 6 Guidance memo because it allows for more flexibility in the local limit redevelopment process. The TCEQ will take the information provided during the meeting under further consideration.

TPDES Permit Action Process for all Substantial Modifications:

The TCEQ plans to utilize the staff-initiated minor amendment process to approve the pending program modifications currently under review.

Discussion on EPA Method Update Rule:

The TCEQ provided a status update on the agency's implementation of the 2017 EPA Method Update Rule. The TCEQ will respond to all comments received on the proposed revisions to Appendix E of the Procedures to Implement the Texas Surface Water Quality Standards.

TPDES Pretreatment Program
Stakeholders' Meeting
Notes / Follow-up Items

Questions / Answers Segment:

30 TAC Chapter 312 Sludge Rule Revision:

A stakeholder discussed concerns with the TCEQ's current standard for Selenium in Class A sludge. 30 TAC Chapter 312 is currently under revision, and the need for any changes would be done during this rulemaking.

Forms for Implementation of Programs:

A stakeholder requested changes to the current process of requiring nonsubstantial modification submissions for any revisions of forms used to implement the program, and the TCEQ will follow up on this request.

Hexavalent Chromium and Minimal Cyanide:

A stakeholder requested that the TCEQ no longer require sampling for both hexavalent chromium and minimal cyanide if the results for total chromium and total cyanide are lower than the corresponding minimum analytical levels MALs. The TCEQ will follow up on this request.