



Texas Commission on Environmental Quality Texas Pollutant Discharge Elimination System Pretreatment Program Stakeholders' Meeting

September 19th, 2019 @ 1 p.m.
Building E, Room 201S

Meeting Summary

Welcome	Josalyn McMillon
Updates to the TCEQ Pretreatment Program	Josalyn McMillon
Dental Amalgam Rule	Jessica Alcoser
<ul style="list-style-type: none">• Frequently asked questions from Control Authorities• Expectations of the TCEQ Water Quality Division	
Plan for addressing backlog of pending program modifications	Bridget Malone
<ul style="list-style-type: none">• Streamlining Rule Modifications• Technically-Based Local Limit Redevelopments• New Minor Amendment TPDES permit application for pretreatment	
Discussion on boilerplate pretreatment language in TPDES permits	Erin Darling, Ph.D.
<ul style="list-style-type: none">• Influent/Effluent sampling requirements• 1993 Region VI memo vs. 2004 national guidance manual	
Changes for Control Authorities sampling in lieu of industries	Erika Crespo
Discussion on the definition and regulation of "Industrial Users"	Erika Crespo
<ul style="list-style-type: none">• Expectations for industrial user surveys• Expectations for upcoming audits	
Questions/Answers	
Announcements	Jessica Alcoser
<ul style="list-style-type: none">• Next Meeting - Thursday, January 23rd, 2020 from 1:00pm - 4:00pm• Updates to TCEQ Pretreatment webpages• WQD Pretreatment Email	
Adjournment	

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

Conference Call Participants - Dialing Instructions:

1. TCEQ Staff Access Number: 512-239-3446
2. Toll Free (for external customers ONLY): 844-368-7161
3. Participant's Collaboration code: 130241#

Updates to the TCEQ Pretreatment Program

TCEQ Talking Points:

Josalyn McMillon presented changes to TCEQ Pretreatment Program, which included the need to create a separate Pretreatment Team. McMillon stated:

- TCEQ pretreatment coordinators have been reclassified to more accurately reflect their actual work responsibilities.
- Both the audit process and the audit reports have also been revised. TCEQ audit reports have been restructured and resized, and EPA has made no objections to these revisions.
- TCEQ pretreatment coordinators have started conducting file reviews in the office beforehand in an effort to take less of the Control Authority's (CA's) staff time while on-site during the audit week.
- The number of site visits conducted during audit trips has been reduced in an effort to provide more time for file reviews and consulting with the CA about the implementation of its program.
- TCEQ pretreatment coordinators provide the CA with a draft copy of the exit meetings notes at the conclusion of the audit to ensure transparency and open communication.
- TCEQ pretreatment coordinators are in the process of developing an internal resource handbook to train new staff members, as well as ensure that the TCEQ Pretreatment Program is consistently implemented despite any staff turnovers.

CA Discussion on Updates to the TCEQ Pretreatment Program:

None.

Action Items for the Updates to the TCEQ Pretreatment Program agenda topic:

No action items were presented for this topic.

Dental Amalgam Rule

TCEQ Talking Points:

Jessica Alcoser stated that dental dischargers are considered to be both regulated Industrial Users and Very Small Quantity Generators of hazardous waste. The rule also gives CAs the discretion to designate them as either significant industrial users (SIUs) or categorical industrial users (CIUs) if desired.

Alcoser stated the rule does not require CAs to permit or annually inspect dental dischargers that are subject to the requirements in 40 CFR Part 441.

Alcoser stated that the use and submission of one-time compliance reports (OTCRs) from dental dischargers demonstrates their compliance with the performance standard and the best management practices (BMPs) of the rule.

Alcoser stated that existing dental dischargers must be in compliance with the requirements of the rule by July 14, 2020, and their OTCRs must be submitted to their CAs by no later than October 12, 2020. Alcoser also stated that new dental dischargers must already be in compliance with the requirements of the rule.

Alcoser stated that the rule requires CAs to retain the OTCRs from their dental dischargers for the standard pretreatment record-keeping retention timeframe of a minimum of 3 years. Alcoser also stated that dental dischargers are required to keep copies of their OTCRs indefinitely and make them available upon request.

Alcoser said that the rule states that if a dental discharger transfers ownership of the facility, the new owners must submit a new OTCR to its CA no later 90 days after the transfer.

Alcoser stated that the rule contains two discharge prohibitions for dental dischargers that are referred to as BMPs, which state:

- i. There shall be no discharge of waste or scrap dental amalgam to POTWs; and
- ii. No oxidizing or acidic line cleaners that have a pH higher than 8 or less than 6 standard units (SU) shall be used.

Alcoser stated that dental dischargers are required to conduct ongoing operation and maintenance on their installed dental amalgam separators. Alcoser also stated that the following records shall be maintained on-site at dental dischargers for a minimum of three years and made available upon request:

- i. Documentation of the internal inspections performed on amalgam separators;
- ii. Documentation on the replacement of the containers on amalgam separators;
- iii. Manifest records for the shipping or hauling of dental amalgam off-site;
- iv. Documentation of any repairs or replacements made to amalgam separators; and
- v. A copy of the manufacturers operating manual for the current device.

Alcoser stated that the rule states that if it is determined that a dental amalgam separator is not functioning properly, it must be either repaired or replaced within 10 business days after the malfunction was discovered.

The TCEQ Dental Amalgam Rule FAQs for CAs were passed out during the meeting. Alcoser request that our stakeholders review this document and provide any questions, comments, or concerns to the general pretreatment inquiry email address, WOPret@tceq.texas.gov, by Friday, October 18th, 2019, for review and consideration.

Stakeholders Discussion on the Implementation of the Dental Amalgam Rule:

Stakeholders asked if TCEQ was expecting CAs to sample dental dischargers and why testing down to the MALs was needed in instances when a local limit is a higher value. Erika Crespo said the TCEQ would look into whether or not testing down to the MALs is necessary in instances when local limit is a higher value.

Stakeholders asked about whether or not there is a standard One-Time Compliance Report (OTCR) form to use and if CAs need to submit their form templates to the TCEQ for review and approval as a modification to their approved pretreatment programs. Crespo said that OTCRs need to be submitted to the TCEQ Pretreatment Team for review and approval as a non-substantial modification that is self-implementing within 45 days unless revisions are requested.

Stakeholders asked for clarification on the expectations for enforcement regarding dental offices, as well as where the documents in their approved programs need to reflect their desired practices [e.g. legal ordinances, standard operating procedures (SOPs), or enforcement response plan (ERP)]. Crespo said that the answer to this question is very program-specific, and she

stated that this particular topic is addressed in the Draft FAQs. McMillon pointed out that the rule is vague regarding enforcement and that it is up to the CAs if they choose to implement enforcement practices.

Stakeholders stated concerns about testing down to the low-levels for mercury (as required in approved methods 245.7 and 1631.E). David Galindo replied that staff will be exploring this topic further and consulting with EPA on the best path forward.

Stakeholders expressed interest in knowing what the TCEQ will be looking for during future audits. Crespo referred stakeholders to the information in the Dental FAQ, Item #1. Malone added that TCEQ auditors may also request to see a copy of the notification that was sent to the dental dischargers, a copy of the CA's master list of IUs, and a copy of the OTCR template that the CA is using.

Action Items for the Dental Amalgam Rule agenda topic:

The TCEQ will look into whether or not testing down to the MAL is needed in instances when the local limit is a higher value.

The TCEQ will research whether or not a specific OTCR form has to be submitted as a non-substantial modification, as long the required information and certification statements are included on the form submitted to the CA.

The TCEQ will determine whether or not it is necessary to test down to levels indicated methods 245.7 or 1631.

Plan for pending program modifications

TCEQ Talking Points:

Bridget Malone stated that TCEQ Pretreatment Team has a plan in place to review and approve all of the pending Streamlining Rule modifications that are currently in-house.

Malone stated that the plan for reviewing the pending Streamlining Rule modification consists of a 3-phase process that will ultimately end with the drafting and issuance of a minor amendment TPDES permit to officially incorporate the revisions into the approved program, in most cases. Malone stated that the Phase 1 review has been completed for all of the pending Streamlining packages that have been submitted. Malone stated that the Phase 1 review included a review of all of the pertinent checklists associated with each modification for completeness and accuracy. Malone stated that TCEQ staff worked very hard on this initiative, and the preliminary review was completed in just a couple of months. Malone also stated that the packages are now currently under technical review by senior staff, and this is the Phase 2 review of the current plan, and it includes addressing any concerns discovered by the contractors during Phase I and reviewing all of the pretreatment program documents for consistency. Malone stated that the Phase 3 review consists of pretreatment staff generating notices of deficiency (NODs) and reaching out to programs with our questions, comments, and concerns.

Malone stated that the TCEQ Pretreatment Team would like to thank everyone for being both cooperative and responsive, and please feel free to reach out to either the staff member assigned to your modification review or Erika Crespo with any questions or concerns that you may have going forward. Malone also requested that approved pretreatment programs do their best to ensure that all of the necessary program elements are included, as this will best assist us in expediting and completing our administrative and technical reviews.

Malone stated that the TCEQ Pretreatment Team is still developing a plan to effectively review and approve our pending TBLL redevelopments and new developing pretreatment programs. Malone stated that it may essentially follow the same format as the Streamlining Plan, with staff reviewing the packages for completeness using the checklists, and then senior staff taking over for the technical review and NOD phase. Malone stated that approved programs can contact Erika Crespo with their questions or concerns about either one of these reviews and that she welcomes any suggestions or feedback that our stakeholders have to offer.

Stakeholders Discussion on Plan for Pending Program Modification Reviews:

Stakeholders asked if the TCEQ will still accept the analytical data associated with TBLLs redevelopments that were submitted over 12 months ago even if the data is older than one year and perhaps not representative of their standard discharge anymore? Crespo stated that it is understood how time-consuming and expensive the TBLL redevelopment process is for CAs, and that previously submitted analytical data associated with previous submission would still be accepted.

Stakeholders asked if the TCEQ will reach out to request updates/revisions from programs as we move forward in our process for Streamlining modification reviews. Crespo and Malone both stated that the Pretreatment Team has been reaching out throughout the process to request updates and any needed documentation from programs. Malone stated all programs will have an opportunity prior to the completion of their Phase II reviews to send in any revisions. Crespo stated that any newly submitted updates will not affect the order in which the programs are reviewed and that the plan is for program submissions to be reviewed in chronological order.

Stakeholders asked if each program has a designated Pretreatment Team contact person. Crespo stated that there are no specific program assignments at this time because everyone is working on multiple projects. Crespo also said that programs can always reach out to her directly at any time via phone or email and that she will assign any resulting work to staff members as needed.

Stakeholders asked for the amount of time in which they are expected to provide updates or revisions to their previously submitted program modifications. Crespo said that it would be ideal to have any updates/revisions submitted as soon as possible, but she also stated that the TCEQ Pretreatment Team will be flexible and will work with the needs and availability of the CA.

Action Items for the Plan for Pending Program Modifications agenda topic:

No action items were presented for this topic.

Discussion on boilerplate pretreatment language in TPDES permits

TCEQ Talking Points on Influent/Effluent Sampling Requirements:

Dr. Erin Darling stated that the following reasons support the current TCEQ practice of requiring routine influent/effluent sampling and analysis:

- Useful as proactive supporting documentation showing that the approved pretreatment program is effectively working over time and maintaining the goals and objectives of the national pretreatment program;
- Documents overall compliance with the general prohibitions and specific prohibitions of the national pretreatment program, so that CAs do not have to randomly sample and analyze all of their IUs individually;

- Provides useful data showing that POTWs are not receiving high pollutant concentrations or experiencing reoccurring instances of pass-through and/or interference, especially for the toxic and non-conventional pollutants that are not typically included in the effluent monitoring and reporting requirements of TPDES permits;
- Provides data that is useful during TBLL recertifications to document that the local limits of the approved program are still effective and protective of the POTW, public health, and the environment;
- Provides historical and background data on both the characteristics of the wastewater entering the POTW and the removal efficiency of the treatment system that is useful during the TBLL redevelopment process;
- Provides historical data that can be useful during any legal proceedings against noncompliant industrial users;
- Provides regular and routine analytical data that can be used to compliment industrial waste surveys, since it takes most approved programs three years to identify their ever-changing universe of industrial users, depending on their size and structure (municipalities with or without customer cities vs. river authorities, etc.);
- Some pretreatment programs like the TPDES permit requirement to conduct routine influent/effluent sampling;
- Influent/effluent sampling is a requirement of the Memorandum of Agreement between EPA and TCEQ for annual reports submitted by POTWs affiliated with approved pretreatment programs; and
- The importance of routine influent/effluent sampling is discussed in multiple EPA national guidance documents:
 - 1998 EPA Region 6 guidance document requires the inclusion of influent/effluent monitoring frequencies in TPDES permits issued to approved pretreatment programs.
 - 2004 EPA *Local Limits Development Guidance* manual states that EPA considers ongoing sampling of POTW influent, effluent, and sludge to be important, as well as provides a table of recommended sampling frequencies for POTWs to implement.
 - 2017 EPA *IU Sampling and Inspection Manual for POTWs* mentions keeping track of and responding to unusual influent conditions at the POTW.

Darling stated that the TCEQ currently requires influent/effluent sampling in the TPDES permits that are issued to POTWs with approved pretreatment programs. Darling then stated that the TCEQ Pretreatment Team is open to discussing other ways in which we can still both fulfill our responsibilities detailed in the MOA with EPA and be as protective in our duties as the Approval Authority for the State of Texas.

Stakeholders Discussion on the Current Influent/Effluent Sampling Requirements:

Some stakeholders requested that the TCEQ consider flexibility in allowing pretreatment programs to have a reduction in influent and effluent sampling based on historical data of the pollutant parameters. Stakeholders also asked that the TCEQ consider a reduction in frequency, or a waiver of certain pollutants, such as the organics parameters, low-level mercury analyses, hexavalent chromium when total chromium is at undetectable concentrations, and amenable cyanide when total cyanide is at undetectable concentrations.

Action Items for the Discussion on Current Influent/Effluent Sampling Requirements agenda topic:

The TCEQ will take influent/effluent sampling flexibility into consideration based on the discussion and information provided during the meeting.

TCEQ Talking Points on Guidance Documents Referenced for TBLL Redevelopment:

Darling stated that the following is background information on the current TCEQ requirements:

- The current TPDES permits issued to POTWs with approved pretreatment programs reference both the 1993 EPA Region 6 guidance memo and the 2004 EPA *Local Limits Development Guidance* manual.
- The 1993 EPA Region 6 guidance memo states that sampling plans should be submitted to the TCEQ for review prior to the formal data collection for the development or redevelopment of technically based local limits. The 1993 EPA Region 6 guidance memo also provides guidelines that the TCEQ uses for determining pollutants of concern, however, it references a number for the EPA national pollutants of concern that is no longer correct (EPA changed the number from 10 to 15). Additionally, the 1993 EPA Region 6 guidance memo recommends only six consecutive days of 24-hour influent and effluent sampling and only six sampling events for sludge testing during the official data collection activities.
- The 2004 EPA *Local Limit Development Guidance* manual recommends that POTWs seek input from their Approval Authority on their sampling plans, and the manual states that influent, effluent, and sludge sampling results may be used in subsequent local limits reviews and headworks analysis. The 2004 EPA *Local Limit Development Guidance manual* provides a list of suggested sampling locations both within the collection system and the treatment works to determine the amounts of loadings to be allocated to IUs, pollutant removal rates, and the amount of pollutants in sludge. The 2004 EPA *Local Limit Development Guidance* manual recommends 7 - 14 consecutive days of 24-hour influent and effluent sampling (based on the design flow of the POTW) and 2 sampling events for sludge testing during the official local limit development data collection activities.
- The TCEQ is currently using a hybrid-version of these two guidance materials that was previously created internally in an effort to effectively merge both resources.

Darling stated that TCEQ Pretreatment Team is open to discussing whether or not the use of both the 1993 and the 2004 guidance literature is posing a particular issue for CAs in their efforts to implement pretreatment programs that are protective of their POTWS, public health, and the environment.

Stakeholders Discussion on Guidance Documents Referenced for TBLL Redevelopment:

A stakeholder stated that the influent and effluent sampling discussed in the 2004 guidance manual is only intended for initial program development and not for existing programs that have already developed their technically based local limits. The stakeholder also stated that the 2004 guidance manual allows existing programs to use historical data collected within the previous 12 months for influent and effluent sampling to determine pollutants of concern.

A stakeholder stated that the 2004 EPA *Local Limits Development Guidance* manual superseded and replaced the 1993 EPA Region 6 guidance memo. Yvonna Miramontes said that the TCEQ would look further into this request.

Action Items for the Discussion Guidance Documents Referenced for TBLL Redevelopment agenda topic:

The TCEQ will decide whether or not to continue to reference both the 2004 EPA *Local Limit Development Guidance* manual and the 1993 EPA Region 6 guidance memo in the TPDES permits that are issued by the Water Quality Division.

Changes for Control Authorities (CAs) sampling in lieu of industries

TCEQ Talking Points on Changes for CAs Sampling in Lieu of Industries:

Crespo stated that the TCEQ recognizes both the history associated with the practice and the level of impact that changing it will have on the daily operations of CAs. Crespo stated that the TCEQ Pretreatment Team has met with some programs to address their concerns and discussed this topic at length internally within the agency. Crespo stated that the intent of the discussion during the meeting with stakeholders is to engage in open dialogue and gather collective feedback. Crespo stated that the TCEQ Pretreatment Program does not desire to make any pretreatment-related sampling requirements more stringent unnecessarily, and the objective of the current thorough assessment is to make sure that the TCEQ is properly serving as the Approval Authority in the State of Texas. Crespo then opened the floor up for discussion.

Stakeholders Discussion on Changes for CAs Sampling in Lieu of Industries:

Crespo asked the CAs that sample in lieu of their industries about the number of sampling events that they conduct annually. Some CAs shared that they sample in lieu of their industries completely, and they perform two sampling events each year to comply with both the compliance monitoring requirements and self-monitoring requirements in the federal regulations. Other CAs stated that they sample in lieu of their industries only in instances where there are issues with noncompliance, and that is why the sampling requirements language in some elements of their approved programs appears to be ambiguous and vague. A significant number of CAs indicated that they have the flexibility in their approved programs to perform the self-monitoring sampling activities on behalf of their industries, and it was stated that the permits issued to their industries are the best source for information when CAs sample in lieu of their industries.

The CAs asked for clarification as to why the number of samples if CA was sampling in lieu of is now being brought into question. Miramontes stated that one reason is because the TCEQ Pretreatment Team consists of all new staff and the regulations and requirements of the program are being looked at with fresh eyes. Crespo stated that this issue came up during two recent pretreatment compliance audits, which was why this topic was added to the agenda. McMillon stated that the TCEQ's position on this right now is that CAs sampling in lieu of their industries are required to sample their SIUs two times per year. McMillon also stated this practice has been previously approved by the TCEQ, and the recent audit reports did not list this practice as a violation.

A stakeholder stated that the fresh perspective brought about by the new TCEQ Pretreatment Team is appreciated and beneficial to the overall program.

Action Items for the agenda topic discussing CAs that sample in lieu of their industries:

No action items were presented for this topic.

Discussion on the definition and regulation of “Industrial Users”

TCEQ Talking Points on the Definition and Regulation of Industrial Users:

Crespo stated that she has done a lot of reading and research on this topic. Crespo said that she is very thankful and appreciative of the encouragement and support that she has received, and she presented the following information for discussion and feedback:

- If a CA elects to regulate and enforce against any industrial users discharging to its POTW, it will need to make sure that it has the appropriate legal authority, procedures, and other documentation incorporated into its approved pretreatment program in order to do so.
- The TCEQ Pretreatment Team will be reviewing how CAs conduct their industrial waste surveys and maintain/update their required master list of industrial users during our pretreatment compliance audits. We will be consistent with our history of including findings, alleged violations, and corrective action in our official audit reports going forward.

Stakeholders Discussion on the Definition and Regulation of Industrial Users:

A stakeholder mentioned that the discussions during and after the recent EPA RVIPA Annual Pretreatment Workshop revealed that most CAs cannot sample all of their IUs and that it is not a practical use of their limited resources. The stakeholder also stated that the industrial waste surveys performed by each CA allows for approved programs to identify new industrial users that meet the requirements to be designated as SIUs. Crespo thanked the stakeholder for the comments, and she clarified the information that was presented during the recent EPA RVIPA Annual Pretreatment Workshop and restated the information that was up for discussion and feedback.

Stakeholders asks what the TCEQ auditors would be evaluating during program audits. Crespo stated that TCEQ auditors will review the industrial waste survey activities performed within a three-year timeframe to ensure that a complete universe of all industrial users has been identified, unless the CA's program states that it will perform its industrial waste surveys at a different frequency. Crespo also said that TCEQ auditors will evaluate the resources being used and how IUs and SIUs are being re-evaluated for SIU and CIU determinations over time.

A stakeholder asked about the standard length of the industrial waste survey document and whether using an 18-page document is excessive. The resulting discussion revealed that the EPA model of an industrial waste survey in the 1983 EPA *Guidance Manual for POTW Pretreatment Program Development* is only 8 pages long and that CAs can revise their industrial waste surveys based on the needs of their programs.

Stakeholders asked for the definition of an industrial user and provided a variety of examples of non-residential entities that may or may not fall under this definition. Crespo stated that all the regulations and guidance resources that she has reviewed have indicated that an industrial user is any entity that discharges wastewater containing pollutants not typically found in the wastewater from residential and domestic sources. Crespo requested for CAs to provide their input and feedback on the definition of an industrial user and what constitutes process wastewater. A stakeholder stated this determination can be made based on whether the wastewater from the industrial users have the potential to cause any issues in the collection system or contribute to any instances of pass through, interference, inhibition, or sludge contamination. Another stakeholder stated that some approved programs will identify industrial users that are on the borderline of meeting the official criteria to be designated as SIUs, and these industrial users are closely monitored and sampled each year in order for the CAs to use their full discretion on how to appropriately regulate these entities. The stakeholder also stated that any industrial users with documented pH issues or other violations or exceedances may be permitted under these approved pretreatment programs as discretionary SIUs.

Action Items for the agenda topic discussing the definition and regulation of IUs:

No action items were requested at this time.

Open Discussion and Q/A Segment

CA Discussion during Q/A Segment:

A stakeholder mentioned that questions have come up during previous audits regarding issues associated with industries not appropriately filling out their chain-of-custody (COC) forms for analytical samples. The stakeholder also proposed the use of certification statements for the TCEQ's consideration as an alternative form of documentation of compliance.

Stakeholders mentioned concerns about inconsistencies between pretreatment compliance audits and pretreatment compliance inspections, and CAs asked the TCEQ for insight into the focus and areas of interest for future pretreatment compliance audits.

A stakeholder expressed an interest in having access to the internal resource handbook being developed for the TCEQ Pretreatment Team.

Some CAs shared concerns about being required to pass changes to their legal authority through their local governing bodies prior to having an official approval date from the TCEQ via the issuance of TPDES permit.

A stakeholder requested an update on the TCEQ's implementation plan and schedule for complying with the NPDES Electronic Reporting Rule.

Stakeholders asked the TCEQ for more information on the testing requirements for the four new pollutants that have been added under the EPA Method Update Rule. Stakeholders stated that not all of the new pollutants have an associated 40 CFR Part 136 approved analytical method, and the TCEQ Water Quality Standards Group developed the criteria for some of them. Stakeholders asked whether or not they would be required to analyze for these new pollutants.

Action Items for the Open Discussion and Q/A Segment:

The TCEQ will look into whether or not certification statements can be used as an alternative form of documentation of compliance for COC forms.

The TCEQ will assess for effective ways to reduce and prevent inconsistencies between pretreatment compliance audits and pretreatment compliance inspections.

The TCEQ will evaluate its substantial modification review and approval processes to determine if there is a more efficient way to document revisions to the program's legal authority being adopted locally.

The TCEQ will make a decision regarding the testing requirements for the four new pollutants that have been added under the EPA Method Update Rule.

TCEQ Announcements:

- The next Pretreatment Stakeholders' Meeting is scheduled for Thursday, January 23, 2019 from 1:00pm - 4:00pm. Please submit any proposed agenda topics in advance to WQPret@tceq.texas.gov.
- Updates have been made to the TCEQ Pretreatment webpages (<https://www.tceq.texas.gov/permitting/wastewater/pretreatment>). Please see the websites listed below for more information:

Title of the Pages	Website
What Is Wastewater Pretreatment?	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/pretreatment_definition.html
Pretreatment Requirements for Industrial Users	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/pretreatment-requirements-for-industrial-users
Categorical Industrial Users: Categories and Requirements	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/categorical-industrial-users-categories-and-requirements
Publicly Owned Treatment Works without Approved Pretreatment Programs	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/unapproved.html
Publicly Owned Treatment Works: Approved Pretreatment Program	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/approved.html
Modifying Your Approved Pretreatment Program	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/approved_programs_modifications.html
Technically Based Local Limits for Wastewater Discharges from POTWs	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/tbls.html
Contacting the Pretreatment Program	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/pretreatment_contact.html
Dental Offices: Wastewater Discharge Rule	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/dental-office-wastewater-discharge-rule
Wastewater Pretreatment Training and Seminars	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/training_seminars.html
Pretreatment Stakeholder Group	https://www.tceq.texas.gov/permitting/wastewater/pretreatment/pretreatment_stakeholder_group.html

Adjournment