TNRCC Organization

cc: Mark Fadden
Mike Murphy
Keith Thompson
(Y2K)

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

January 5, 1999

Subject: Preparing Public Water Suppliers in Texas for Year 2000

Dear Public Water Supplier:

This letter is to inform you that your water system could be affected by operational problems due to date sensitive computer chips. The Year 2000 (Y2K) problem is very real and easy to overlook. Impacts could range from minor annoyance to total systems failure. By acting now you can avoid failures that could impact the quality of water you provide to your customers or impact the delivery of water to your customers. An information sheet and reference guide has been enclosed for your use.

The time to prepare for possible Y2K problems is now. All major software vendors have Y2K information on their Web sites. Visit the vendor site and see what the Y2K issues are and what remedies they offer. If the managers of your water system would rather employ an outside source, there are consulting firms that perform Y2K troubleshooting measures. The important thing to remember is that time is an issue. Data must be converted, employees must be trained and the systems tested for reliability. Maintaining a safe, dependable water supply and averting any potential Y2K problems is a goal we share with everyone across the state of Texas.

If you have any questions please call Mike Howell at (512)239-6020.

Sincerely,

Charles R. Maddox

Charles R. Maddox, P.E., Manager
Public Drinking Water Section
Water Utilities Division

cc: TNRCC Regions 1-16
Drinking Water Advisory Workgroup
Don Johnson - TNRCC Y2K Systems Coordinator

The Y2K Bug

The Problem:

The Y2K problem is both a hardware and a software problem. Some computer hardware and software, and some electronic components contain programmable logic controllers (PLCs) that may have trouble when going from the year 1999 to the year 2000 because they were designed to use only two digits to represent the year. There is a great deal of variation in chip design, and the way computer chips deal with going from year "99" to year "00" depends on the controller and the specific application.

Corrective Steps To Take:

- Inventory all components with a programable logic controller, particularly those that ask for a date after a power failure, or have a battery back-up power source. A detailed inventory checklist can be obtained from the Association of Metropolitan Water Agencies. (See attachment for web site)
- Assess the items found during the inventory and then prioritize based on severity.
- Involve board members and public officials so they know what the utility is doing and what the cost will be for implementing a program.
- Test components (see AMWA link).
- Document systems checked and your findings.
- Correct any problems encountered and document all repair/replacement decisions.
- Develop a contingency plan and test the plan.
- Have paper backups of mission critical information.
- Inform customers that steps are being taken to ensure they will continue to receive an adequate supply of safe, clean water.

Places You Should Look In Your Operations:

Billing Systems:

- Assess your customer billing and usage tracking system and problem solve as necessary.
- Make sure customer database/billing system uses a four-digit year, not two.
- Check versions of your operating software, databases, and software that communicates between databases, servers and clients. Contact your software vendors for Y2K compliance information.
- Contact PC, motherboard, BIOS manufacturer/supplier to assure items used for billing are Y2K compatible.

Computer Controlled Production and Process Control:

- Check version of operating software, databases, and software that communicates between databases, servers and clients.
  examples:
  - level controllers
  - data loggers that use the date such as systems that record flow rate, turbidity, chemical feed rates, etc.
  - automated controllers that turn pumps on or off, especially those that operate the pumps periodically each day
  - package plants
    - flow controllers
    - chemical pacing controllers
    - level sensors
    - chemical monitors with feedback loops
  - remote monitoring and control systems such as those at re-chlorination stations
  - SCADA hardware and software
  - computers used to control processes

Places You Should Look Outside Your Water Supply Operations:

- Verify that your electric supplier is on track to reduce risks. Discuss with them where water suppliers fit into their Y2K preparations and contingency plans, and emphasize the importance of public water supply within their return-of-power hierarchy.
- Treatment chemical supply and delivery.
- Telecommunication service between your central office and remote locations.

February 1999

Monthly Planner

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 11:30 AM Employee ACTION! Cmte.	*2* Agenda Items Due	*3* 10:00 AM DRAFT AGENDA ABA Luncheon	*4* 8:00 AM Mayor's Breakfast/Conf. Ctre.	*5*	*6*
7	*8* 12:00 PM Toast-masters/Conf. Centre 7:00 PM Town Meeting/Conf. Centre MONTHLY REPORTS DUE	*9* 7:30 AM Metroplex Mayors' Bkfst. 10:00 AM Pre-Council Meeting 7:30 PM COUNCIL MEETING	*10* 10:00 AM POST COUNCIL MEETING	*11*	*12*	*13*
14	*15*	*16* Agenda Items Due	*17* 8:30 AM Safety Review Bd. Mtg. 10:00 AM DRAFT AGENDA 4:30 PM Toll Tunnel Opening 6:30 PM Airport Bd. Mtg.	*18*	*19*	*20* 7:30 PM Black History/White Rock Chapel
21	*22* 12:00 PM Toast-masters/Conf. Centre	*23* 10:00 AM Pre-Council Meeting 7:30 PM COUNCIL MEETING	*24* 10:00 AM POST COUNCIL MEETING	*25* 7:30 PM P & Z Committee Mtg.	*26*	*27*
28						

January

S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

March

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 1, 1999

Re: Transition to the Texas Pollutant Discharge Elimination System Pretreatment Program

Dear Permittee:

Welcome to the Texas Pollutant Discharge Elimination System (TPDES) Pretreatment Program. We are pleased to announce to you that the authority for implementation of the National Pretreatment Program in Texas transferred from the Environmental Protection Agency to the Texas Natural Resource Conservation Commission (TNRCC) on September 14, 1998.

To assist with our transition we have enclosed several annual report forms, instructions, guidance documents, staff assignments and telephone contacts for you to use. If you would like the electronic versions of the annual report forms in WordPerfect 6.0 or need further assistance, please contact any member of the Pretreatment team of the TNRCC Water Quality Division at (512) 239-4433.

We are looking forward to enhanced communication among the pretreatment programs in Texas. You may find basic information concerning the TPDES transition on the TNRCC website at www.tnrcc.state.tx.us/water/quality/tpdes.

Sincerely,

Sally C. Gutierrez, R.S., Director
Water Quality Division

Enclosures

Attachment 1: TNRCC Pretreatment Team and Staff Assignments

TNRCC Pretreatment Team

Ms. Jill Russell
Pretreatment Team Leader
Wastewater Permits Section
Water Quality Division (MC148)
TNRCC
P.O. Box 13087
Austin, Texas 78711-3087
512/239-4564; fax 512-239-4430
jrussell@ tnrcc.state.tx.us

Ms. Rebecca Villalba
Pretreatment Coordinator
Wastewater Permits Section
Water Quality Division (MC148)
TNRCC
P.O. Box 13087
Austin, Texas 78711-3087
512/239-4784; fax 512-239-4430
rvillalb@ tnrcc.state.tx.us

Mr. Luis Aguirre
Pretreatment Coordinator
Wastewater Permits Section
Water Quality Division (MC148)
TNRCC
P.O. Box 13087
Austin, Texas 78711-3087
512/239-2517; fax 512-239-4430
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Ms. Vidya Rao
Pretreatment Coordinator
Wastewater Permits Section
Water Quality Division (MC148)
TNRCC
P.O. Box 13087
Austin, Texas 78711-3087
512/239-1723; fax 512-239-4430
vrao@ tnrcc.state.tx.us

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000

REGIONAL OFFICES

1 – AMARILLO

Regional Manager - Brad Jones
3918 Canyon Drive
Amarillo, TX 79109-4996
806/353-9251 FAX: 806/358-9545

2 – LUBBOCK

Regional Manager - Jim Estes
4630 50th St., Suite 600
Lubbock, TX 79414-3509
806/796-7092 FAX: 806/796-7107

3 – ABILENE

Regional Manager - Winona Henry
209 South Danville, Suite B200
Abilene, TX 79605-1451
915/698-9674 FAX: 915/692-5869

4 – ARLINGTON

Regional Manager - Melvin Lewis
1101 East Arkansas Lane
Arlington, TX 76010-6499
817/469-6750 FAX: 817/795-2519

5 – TYLER

Regional Manager - Leroy Biggers
2916 Teague Drive
Tyler, TX 75701-3756
903/535-5100 FAX: 903/595-1562

6 – EL PASO

Regional Manager - Frank Espino
7500 Viscount Blvd., Suite 147
El Paso, TX 79925-5633
915/778-9634 FAX: 915/778-4576

7 – MIDLAND

Regional Manager - Jed Barker
3300 North A St., Bldg. 4, Suite 107
Midland, TX 79705-5421
915/570-1359 FAX: 915/570-4795

8 – SAN ANGELO

Regional Manager - John Haagensen
301 W. Beauregard Ave., Suite 202
San Angelo, TX 76903-6326
915/655-9479 FAX: 915/658-5431

9 – WACO

Regional Manager - Gene Fulton
6801 Sanger Ave., Suite 2500
Waco, TX 76710-7807
254/751-0335 FAX: 254/772-9241

10 – BEAUMONT

Regional Manager - Vic Fair
3870 Eastex Fwy., Suite 110
Beaumont, TX 77703-1892
409/898-3838 FAX: 409/892-2119

11 – AUSTIN

Regional Manager - Larry Smith
1921 Cedar Bend, Suite 150
Austin, TX 78758-5336
512/339-2929 FAX: 512/339-3795

12 – HOUSTON

Regional Manager -
Leonard Spearman, Jr.
Asst. Reg. Mgr.- Karen Atkinson
5425 Polk Avenue, Suite H
Houston, TX 77023-1486
713/767-3500 FAX: 713/767-3520

13 – SAN ANTONIO

Regional Manager - Richard Garcia
140 Heimer Rd., Suite 360
San Antonio, TX 78232-5042
210/490-3096 FAX: 210/545-4329

South Texas Watermaster Office
210/494-3556 FAX: 210/402-0273
1-800/733-2733

14 – CORPUS CHRISTI

Regional Manager - Buddy Stanley
6300 Ocean Drive, Suite 1200
Corpus Christi, TX 78412-5503
512/980-3100 FAX: 512/980-3101

15 – HARLINGEN

Regional Manager - Tony Franco
134 E. Van Buren, Suite 301
Harlingen, TX 78550-6807
956/425-6010 FAX: 956/412-5059

Rio Grande Watermaster
1500 Dove Ave.
McAllen, TX 78504-3439
956/664-2763 FAX: 956/664-2984

16 – LAREDO

Regional Manager - Jorge L. Bacelis
1403 Seymour, Suite 2
Laredo, TX 78040-8752
956/791-6611 FAX: 956/791-6716

LABORATORY

Lab Manager - Jim Busceme
5144 E. Sam Houston Pkwy. N.
Houston, TX 77015-3225
281/457-5229 FAX: 281/457-9107

TNRCC rules, publications, agendas and highlights of Commission meetings and other environmental information are available from the convenience of your computer by accessing the TNRCC World Wide Web Home Page over the Internet at:

http://www.tnrcc.state.tx.us

TNRCC REGIONS

(including counties in each region)

Region 1 - Amarillo
806/353-9251

Armstrong	Hemphill
Briscoe	Hutchinson
Carson	Lipscomb
Castro	Moore
Childress	Ochiltree
Collingsworth	Oldham
Dallam	Parmer
Deaf Smith	Potter
Donley	Randall
Gray	Roberts
Hall	Sherman
Hansford	Swisher
Hartley	Wheeler

Region 2 - Lubbock
806/796-7092

Bailey	King
Cochran	Lamb
Crosby	Lubbock
Dickens	Lynn
Floyd	Motley
Garza	Terry
Hale	Yoakum
Hockley	

Region 3 - Abilene
915/698-9674

Archer	Kent
Baylor	Knox
Brown	Mitchell
Callahan	Montague
Clay	Nolan
Coleman	Runnels
Comanche	Scurry
Cottle	Shackelford
Eastland	Stephens
Fisher	Stonewall
Foard	Taylor
Hardeman	Throckmorton
Haskell	Wichita
Jack	Wilbarger
Jones	Young

Region 4 - Arlington
817/469-6750

Collin	Johnson
Cooke	Kaufman
Dallas	Navarro
Denton	Palo Pinto
Ellis	Parker
Erath	Rockwall
Fannin	Somervell
Grayson	Tarrant
Hood	Wise
Hunt	

Region 5 - Tyler
903/535-5100

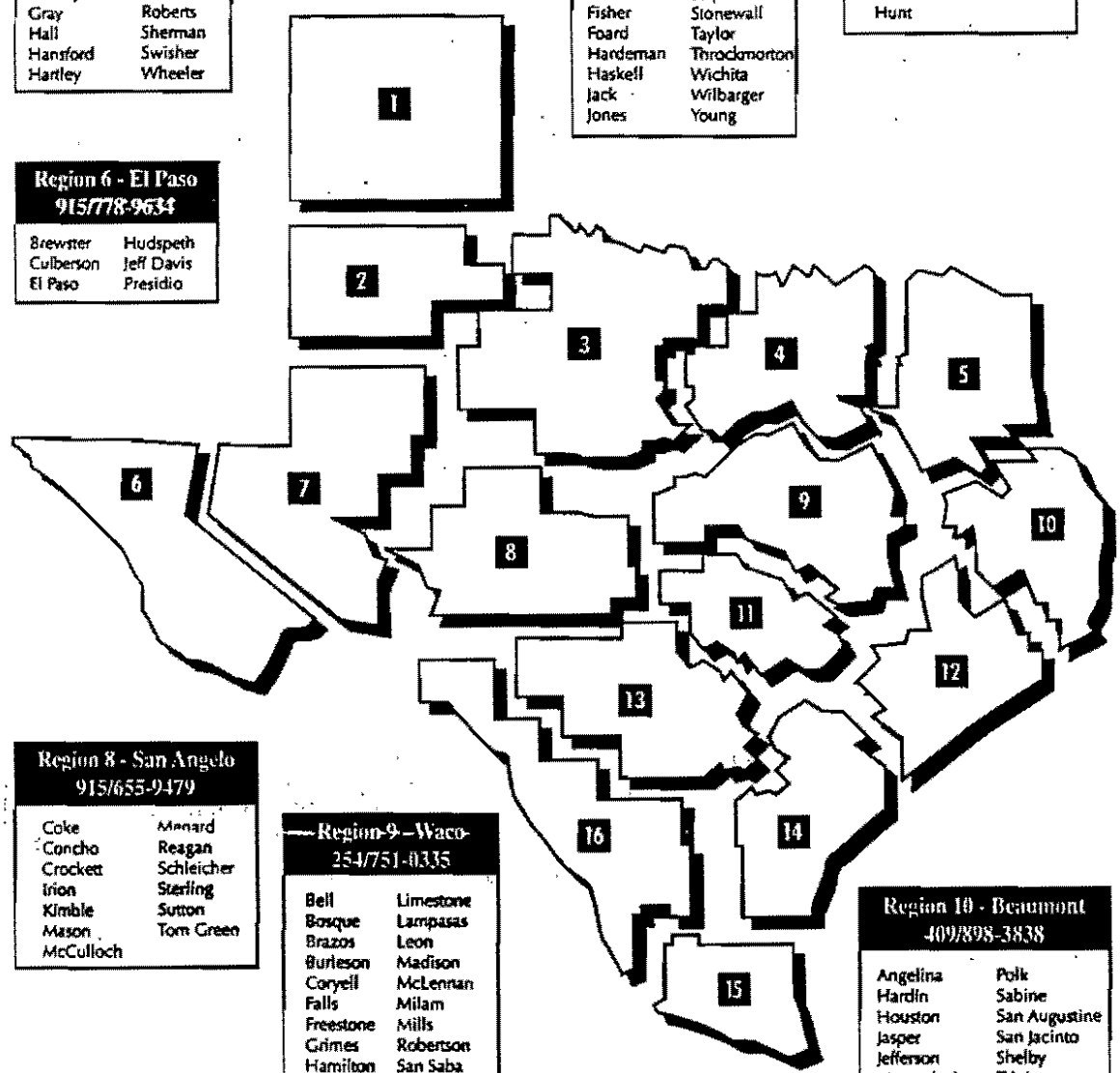
Anderson	Marion
Bowie	Morris
Camp	Panola
Cherokee	Rains
Cass	Red River
Delta	Rusk
Franklin	Smith
Gregg	Titus
Harrison	Upshur
Henderson	Van Zandt
Hopkins	Wood
Lamar	

Region 6 - El Paso
915/778-9634

Brewster	Hudspeth
Culberson	Jeff Davis
El Paso	Presidio

Region 7 - Midland
915/570-1359

Andrews	Martin
Borden	Midland
Crane	Pecos
Dawson	Reeves
Ector	Terrell
Gaines	Upton
Glasscock	Ward
Howard	Winkler
Loving	



Region 8 - San Angelo
915/655-9479

Coke	Menard
Concho	Reagan
Crockett	Schleicher
Irion	Sterling
Kimble	Sutton
Mason	Tom Green
McCulloch	

Region 9 - Waco
254/751-0335

Bell	Limestone
Bosque	Lampasas
Brazos	Leon
Burleson	Madison
Coryell	McLennan
Falls	Milam
Freestone	Mills
Grimes	Robertson
Hamilton	San Saba
Hill	Washington

Region 10 - Beaumont
409/898-3838

Angelina	Polk
Hardin	Sabine
Houston	San Augustine
Jasper	San Jacinto
Jefferson	Shelby
Nacogdoches	Trinity
Newton	Tyler
Orange	

Region 11 - Austin
512/339-2929

Hays	Bastrop
Lee	Blanco
Llano	Burnet
Travis	Caldwell
Williamson	Fayette

Region 12 - Houston
713/767-3500

Austin	Harris
Brazoria	Liberty
Chambers	Matagorda
Colorado	Montgomery
Fort Bend	Walker
Galveston	Waller
	Wharton

Region 13 - San Antonio
210/490-3096

Atascosa	Karnes
Bandera	Kendall
Bexar	Kerr
Comal	Medina
Edwards	Real
Frio	Uvalde
Gillespie	Wilson
Guadalupe	

Region 14 - Corpus Christi
512/980-3100

Aransas	Kleberg
Bee	Lavaca
Calhoun	Live Oak
De Witt	Nueces
Goliad	Refugio
Gonzales	San Patricio
Jackson	Victoria
Jim Wells	

Region 15 - Harlingen
956/425-6010

Brooks	Kenedy
Cameron	Starr
Hidalgo	Willacy
Jim Hogg	

Region 16 - Laredo
956/791-6611

Dimmit	McMullen
Duval	Val Verde
Kinney	Webb
La Salle	Zapata
Maverick	Zavala

POTW	TPDES	REGION	AUDITOR	PCI_INSP	BASIN	BASIN_EXP	SEGMNTNO
ABILENE	WQ0010334.004	3	VILLALBA	SMALLEY-AR	BRAZOS RIVER	03/01/1999	1232
AMARILLO-RIVER	WQ0010392.001	1	VILLALBA	SMALLEY-AR	CANADIAN RIVER	10/01/2001	103
AUSTIN-GOVALLE	WQ0010543.003	11	AGUIRRE	FOGARTY-HOU	COLORADO RIVER	09/01/1999	1428
BAYTOWN-WEST DIS	WQ0010395.08	12	RUSSELL	FOGARTY-HOU	SAN JACINTO RIVER	03/01/2000	1001
BEAUMONT	WQ0010501.020	10	RUSSELL	FOGARTY-HOU	NECHES-TRINITY COASTAL	07/01/1998	704
BRA ROUND ROCK-	WQ0010264.002	11	RAO	FOGARTY-HOU	BRAZOS RIVER	12/01/1998	1244
BRA-SUGAR LAND	WQ0011317.001	12	VILLALBA	FOGARTY-HOU	BRAZOS RIVER	07/01/1999	1202
BRA-TEMPL-BELTN	WQ0011318.001	9	RAO	FOGARTY-HOU	BRAZOS RIVER	05/01/1999	1218
BRA-WACO	WQ0011071.001	9	AGUIRRE	FOGARTY-HOU	BRAZOS RIVER	12/01/1998	1242
BRENHAM	WQ0010388.001	9	RAO	FOGARTY-HOU	BRAZOS RIVER	07/01/1999	1202
BROWNSVILLE-NOR	WQ0010397.005	15	VILLALBA	FOGARTY-HOU	BAYS AND ESTUARIES	07/01/2000	2494
BROWNWOOD	WQ0010656.001	3	AGUIRRE	SMALLEY-AR	COLORADO RIVER	09/01/1999	1431
BRYAN	WQ0010426.001	9	VILLALBA	FOGARTY-HOU	BRAZOS RIVER	05/01/1999	1209
CLEBURNE	WQ0010006.001	4	RUSSELL	SMALLEY-AR	BRAZOS RIVER	03/01/1999	1227
CONROE	WQ0010008.002	12	VILLALBA	FOGARTY-HOU	SAN JACINTO RIVER	07/01/1998	1004
CORPUS CHR-OSO	WQ0010401.004	14	RAO	FOGARTY-HOU	BAYS AND ESTUARIES	06/01/2000	2485
CORSICANA	WQ0010402.003	4	RUSSELL	SMALLEY-AR	TRINITY RIVER	09/01/2002	836
DALLAS-CENTRAL	WQ0010060.001	4	RAO	SMALLEY-AR	TRINITY RIVER	12/01/2002	805
DENISON-PAW PAW	WQ0010079.003	4	AGUIRRE	SMALLEY-AR	RED RIVER	12/01/2001	202
DENTON	WQ0010027.003	4	AGUIRRE	SMALLEY-AR	TRINITY RIVER	10/01/2002	823
EL PASO-HASKELL	WQ0010408.004	6	RUSSELL	FOGARTY-HOU	RIO GRANDE	09/01/2000	2308
ENNIS	WQ0010443.002	4	AGUIRRE	SMALLEY-AR	TRINITY RIVER	12/01/2002	814
FORT WORTH	WQ0010494.013	4	RAO	SMALLEY-AR	TRINITY RIVER	09/01/2002	841
FT BEND WCID 2	WQ0010086.001	12	VILLALBA	FOGARTY-HOU	BRAZOS RIVER	12/01/1998	1245
GAINESVILLE	WQ0010726.001	4	AGUIRRE	SMALLEY-AR	TRINITY RIVER	09/01/2002	824
GALVESTON-MAIN	WQ0010688.001	12	RUSSELL	FOGARTY-HOU	BAYS AND ESTUARIES	11/01/1998	2439
GARLAND	WQ0010090.001	4	VILLALBA	SMALLEY-AR	TRINITY RIVER	10/01/2002	819
GBRA-VICTORIA	WQ0011078.001	14	AGUIRRE	FOGARTY-HOU	GUADALUPE RIVER	02/01/2000	1803
GCWDA-BAYPORT	WQ0001054.000	12	AGUIRRE	FOGARTY-HOU	BAYS AND ESTUARIES	11/01/1998	2438
GREENVILLE	WQ0010485.002	4	AGUIRRE	SMALLEY-AR	SABINE RIVER	03/01/2002	507
HARLINGEN	WQ0010490.003	15	RAO	FOGARTY-HOU	NUECES-RIO GRANDE COA	06/01/2000	2202
HOUSTON-IMP VAL	WQ0010495.101	12	VILLALBA	FOGARTY-HOU	SAN JACINTO RIVER	12/01/2003	1016
HUNTSVILLE	WQ0010781.002	12	AGUIRRE	FOGARTY-HOU	SAN JACINTO RIVER	06/01/2003	1012
JACKSONVILLE-CA	WQ0010693.001	5	VILLALBA	SMALLEY-AR	NECHES RIVER	08/01/2002	611
LEWISVILLE	WQ0010662.001	4	RUSSELL	SMALLEY-AR	TRINITY RIVER	10/01/2002	822
LONGVIEW	WQ0010589.002	5	VILLALBA	SMALLEY-AR	SABINE RIVER	04/01/2002	505
LUBBOCK-#4	WQ0010353.002	2	RAO	SMALLEY-AR	BRAZOS RIVER	03/01/1999	1241
LUFKIN	WQ0010214.001	10	RAO	FOGARTY-HOU	NECHES RIVER	08/01/2002	604
MARSHALL	WQ0010583.002	5	AGUIRRE	SMALLEY-AR	SABINE RIVER	04/01/2002	505
MINERAL WELLS	WQ0010585.004	4	RAO	SMALLEY-AR	BRAZOS RIVER	05/01/1999	1206
McALLEN	WQ0010633.003	15	VILLALBA	FOGARTY-HOU	NUECES-RIO GRANDE COA	06/01/2000	2202
NACOGDOCHES	WQ0010342.004	10	RAO	FOGARTY-HOU	NECHES RIVER	08/01/2002	611
NEW BRAUNFELS	WQ0010232.002	13	AGUIRRE	FOGARTY-HOU	GUADALUPE RIVER	02/01/2000	1812

POTW	TPDES	REGION	AUDITOR	PCI_INSP	BASIN	BASIN_EXP	SEGMNTNO
NTMWD FRISCO	WQ0010172.001	4	VILLALBA	SMALLEY-AR	TRINITY RIVER	10/01/2002	823
NTMWD-BUFFALO	WQ0012047.001	4	RAO	SMALLEY-AR	TRINITY RIVER	10/01/2002	819
NTMWD-FLOYD BR	WQ0010257.001	4	AGUIRRE	SMALLEY-AR	TRINITY RIVER	09/01/2002	827
NTMWD-MESQUITE	WQ0010221.001	4	RAO	SMALLEY-AR	TRINITY RIVER	10/01/2002	819
NTMWD-PLANO	WQ0010363.001	4	VILLALBA	SMALLEY-AR	TRINITY RIVER	10/01/2002	820
NTMWD-WILSON CR	WQ0012446.001	4	RUSSELL	SMALLEY-AR	TRINITY RIVER	10/01/2002	821
NTMWD-WYLIE	WQ0010384.001	4	AGUIRRE	SMALLEY-AR	TRINITY RIVER	10/01/2002	820
ODESSA-EAST	WQ0010238.002	7	RUSSELL	FOGARTY-HOU	COLORADO RIVER	12/01/1999	1412
PALESTINE	WQ0010244.001	5	RAO	SMALLEY-AR	TRINITY RIVER	02/01/2003	804
PARIS	WQ0010479.002	5	AGUIRRE	SMALLEY-AR	RED RIVER	12/01/2001	202
PORT ARTHUR-MAI	WQ0010364.001	10	RAO	FOGARTY-HOU	NECHES-TRINITY COASTAL	07/01/1998	703
SAN ANTONIO-LEO	WQ0010137.003	13	VILLALBA	FOGARTY-HOU	SAN ANTONIO RIVER	03/01/2000	1906
SAN MARCOS	WQ0010273.002	11	RAO	FOGARTY-HOU	GUADALUPE RIVER	02/01/2000	1814
SHERMAN	WQ0010329.001	4	RAO	SMALLEY-AR	RED RIVER	12/01/2001	202
SOUTH HOUSTON	WQ0010287.001	12	RUSSELL	FOGARTY-HOU	SAN JACINTO RIVER	09/01/2003	1007
STEPHENVILLE	WQ0010290.001	4	AGUIRRE	SMALLEY-AR	BRAZOS RIVER	12/01/1998	1255
SULPHUR SPRINGS	WQ0010372.001	5	RAO	SMALLEY-AR	SULPHUR RIVER	01/01/2002	303
TEMPLE	WQ0010470.002	9	RAO	FOGARTY-HOU	BRAZOS RIVER	05/01/1999	1213
TERRELL	WQ0010747.001	4	AGUIRRE	SMALLEY-AR	TRINITY RIVER	12/01/2002	818
TEXARKANA	WQ0010374.005	5	VILLALBA	SMALLEY-AR	SULPHUR RIVER	01/01/2002	304
TRA (10 MILE)	WQ0010984.001	4	RUSSELL	SMALLEY-AR	TRINITY RIVER	12/01/2002	805
TRA (CENTRAL)	WQ0010303.001	4	VILLALBA	SMALLEY-AR	TRINITY RIVER	09/01/2002	841
TYLER-SOUTH	WQ0010653.002	5	RUSSELL	SMALLEY-AR	NECHES RIVER	08/01/2002	611
WAXAHACHIE	WQ0010379.001	4	VILLALBA	SMALLEY-AR	TRINITY RIVER	12/01/2002	815
WEATHERFORD	WQ0010380.001	4	VILLALBA	SMALLEY-AR	TRINITY RIVER	09/01/2002	831
WICHITA FALLS	WQ0010509.001	3	RUSSELL	SMALLEY-AR	RED RIVER	12/01/2001	214

Effective February 1, 1999

Errata Sheet for the TNRCC Regional Offices Address List

Region 3 Abilene Office new address:

1977 Industrial Blvd.
Abilene, Texas 79602

Phone: (915) 698-9674 Fax 915/692-5869

Attachment 2: TNRCC Annual Report Forms and Instructions

TPDES ANNUAL REPORT INSTRUCTIONS

The TPDES Pretreatment Program Annual Reports are designed to describe the activities and effectiveness of your pretreatment program. Annual reports are required by your TPDES permit, and the contents of the annual reports are prescribed by 40 CFR §402.12(i). The purpose of this guidance is to translate the TPDES permit requirements into a standardized format which will assist you in the preparation of these reports. The annual reports are due by the last day of the month required by your TPDES permit. We have provided the following tables with instructions for your use:

PRETREATMENT PERFORMANCE SUMMARY (PPS) TABLE

UPDATED SIGNIFICANT INDUSTRIAL USER LIST TABLE

ENFORCEMENT ACTIONS TAKEN TABLE

INDUSTRIAL INVENTORY MODIFICATIONS TABLE

INFLUENT AND EFFLUENT MONITORING RESULTS TABLE

These tables may be adapted to fit your word processing capabilities provided all of the required information is included.

You are also required to submit:

1) The annual newspaper publication of Industrial Users in significant noncompliance with pretreatment standards and requirements;

2) A report on any interference, pass through, upset or POTW permit violations known or suspected to be caused by industrial contributors and actions taken by the permittee in response.

PRETREATMENT PERFORMANCE SUMMARY (PPS) INSTRUCTIONS

The Pretreatment Performance Summary is used to summarize the information from your pretreatment program. For those pretreatment programs with multiple wastewater treatment plants, only **one** PPS sheet which summarizes the entire program needs to be filled out.

When completing this form please use the following guidelines:

I. General Information
This part is self explanatory for contact name, address and phone number.

For those pretreatment programs with multiple wastewater treatment plants, please indicate all of the TPDES/NPDES permit numbers which are covered under your pretreatment program.

Please be certain to report the correct months of your reporting period which should end with the month **prior to** the report due date month. For example, if your report due date month is June, then your pretreatment year should begin in June and end in May. Your report due date month is listed in your TPDES/NPDES permit.

II. Significant Industrial User Compliance
This part has remained the same as the EPA Region 6 form with one exception. Item 4 has changed slightly to request a different set of significant industrial users (SIUs) in significant noncompliance (SNC) with any compliance schedule. It now reads:

No. of SIUs **in SNC** with Compliance Schedule/Total No. Required to Meet Schedule

III. Compliance Monitoring Program
No changes have been made to the type of information requested by the EPA Region 6 form.

IV. Enforcement Actions
This part has remained the same as the EPA Region 6 form with two exceptions.
Items 4 and 5 have changed slightly. They now read:

4. No. of Civil Actions
5. No. of Criminal Actions

NOTE: Please make sure all items in all sections are completely answered. If any items are left blank, the annual report will be considered incomplete.

PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA/TNRCC. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT TNRCC AUTHORIZATION.

I. General Information

Control Authority Name _____

Address _____

City _____ State/Zip _____

Contact Person _____
(Position)

Contact Telephone _____
(Area Code)

TPDES/NPDES Permit Nos. _____

Reporting Period _____ To _____
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs _____
Total Number of Significant Noncategorical IUs _____

II. Significant Industrial User Compliance

		SIGNIFICANT INDUSTRIAL USERS	
		Categorical	Noncategorical
1)	No. of SIUs Submitting BMRs/Total No. Required	_____	N/A*
2)	No. of SIUs Submitting 90-Day Compliance Reports/No. Required	_____	N/A*
3)	No. of SIUs Submitting Semiannual Reports/ Total No. Required	_____	_____
4)	No. of SIUs in SNC with Compliance Schedule/ Total No. Required to Meet Schedule. . . .	_____	_____
5)	No. of SIUs in Significant Noncompliance/ Total No. of SIUs.	_____	_____
6)	Ratio of Significant Noncompliance for all SIUs (categorical and noncategorical).	_____	

III. Compliance Monitoring Program

	SIGNIFICANT INDUSTRIAL USERS	
	Categorical	Noncategorical
1) No. of Control Documents Issued/Total No. Required	_____	_____
2) No. of Nonsampling Inspections Conducted	_____	_____
3) No. of Sampling Visits Conducted	_____	_____
4) No. of Facilities Inspected (nonsampling). . .	_____	_____
5) No. of Facilities Sampled.	_____	_____

IV. Enforcement Actions

	SIGNIFICANT INDUSTRIAL USERS	
	Categorical	Noncategorical
1 No. of Compliance Schedules Issued/No. Schedules Required	_____	_____
2) No. of Notices of Violations Issued to SIUs	_____	_____
3) No. of Administrative Orders Issued to SIUs	_____	_____
4) No. of Civil Actions.	_____	_____
5) No. of Criminal Actions	_____	_____
6) No. of Significant Violators (attach newspaper publication).	_____	_____
7) Amount of Penalties Collected (total dollars/No. of IUs assessed)	_____	_____
8) Other Actions (sewer bans, etc.)..	_____	_____

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

_____ _____

Authorized Representative Date

UPDATED SIGNIFICANT INDUSTRIAL USER LIST TABLE INSTRUCTIONS

The Updated Significant Industrial User (SIU) List Table is used to summarize the information from your pretreatment program during the last pretreatment year. You do not need to include the background information from which your summary is derived. For those pretreatment programs with multiple wastewater treatment plants, a table for each plant needs to be filled out.

When completing this form please use the following guidelines:

INDUSTRIAL USER

Full name of significant industrial users.

SIC CODE

Self explanatory

CATEGORICAL DETERMINATION

40 CFR Category and subcategory you have determined for each SIU. If the SIU is not a categorical industrial user, then state noncategorical SIU.

CONTROL DOCUMENT

Permit or contract that controls your SIUs. Indicate yes **(Y)** if the SIU is controlled under a current permit/contract and whether or not they are discharging process wastewater. Indicate no **(N)** if the SIU's permit/contract has expired, and the SIU is continuing to discharge process wastewater.

LAST ACTION

Date of last permit/contract action (please identify the action, such as a permit/contract issuance, renewal or amendment).

NEW USER

Answer **Y** or **N**.

TIMES INSPECTED

Number of times inspected during the last pretreatment year.

TIMES SAMPLED

UPDATED SIGNIFICANT INDUSTRIAL USER LIST TABLE INSTRUCTIONS

Number of times sampled by the Control Authority during the last pretreatment year.

COMPLIANCE STATUS: REPORTS

BMR, 90-DAY COMPLIANCE, SEMI-ANNUAL, SELF MONITORING

Indicate **C** if compliant, **N** if noncompliant and **SNC** if in significant noncompliance with federal and/or program requirements.

COMPLIANCE STATUS: EFFLUENT LIMITS

Indicate **C** if compliant, **N** if noncompliant and **SNC** if in significant noncompliance with federal requirements and/or local limits. Indicate which parameters are being violated.

TPDES Pretreatment Program Annual Report Form
for Updated Significant Industrial Users List

Reporting month/year: _____, ____ **to** _____, ____

TPDES Permit No. _____ **Permittee:** _____ **Treatment Plant:** _____

PRETREATMENT PROGRAM STATUS REPORT UPDATED SIGNIFICANT INDUSTRIAL USERS LIST												
INDUSTRIAL USER	SIC CODE	CATEGORICAL DETERMINATION	CONTROL DOCUMENT		NEW USER	TIMES INSPECTED	TIMES SAMPLED	COMPLIANCE STATUS				
			Y/N	LAST ACTION				REPORTS				EFFLUENT LIMITS
								BMR	90-DAY COMPLIANCE	SEMI-ANNUAL	SELF MONITORING	

ENFORCEMENT ACTIONS TAKEN TABLE INSTRUCTIONS

The Enforcement Actions Taken Table is used to summarize the information concerning significantly noncompliant users from your pretreatment program during the last pretreatment year. You do not need to include a narrative of background information from which your summary is derived. Please keep the COMMENTS sections in the table as brief as possible. If more space is needed, please include a reference to another page with additional comments. For those pretreatment programs with multiple wastewater treatment plants, a table for each plant receiving discharges from SIUs needs to be filled out.

When completing this form please use the following guidelines:

INDUSTRIAL USER

Full name of significant industrial user.

NATURE OF VIOLATION: REPORTS

Indicate yes (**Y**) if the SIU was in SNC for reporting violations during the last pretreatment year. In the COMMENTS section please indicate whether the reports were over 30 days late, submitted without certification statements or authorized signatures or other reporting violations.

NATURE OF VIOLATION: LIMITS

Indicate yes (**Y**) if the SIU was in SNC for discharge violations during the last pretreatment year. In the COMMENTS section please indicate what parameters and the frequency the violations occurred (based on technical review criteria (TRC) or Chronic criteria) during the 6 month rolling quarters for SNC determination. Please indicate whether violations for the same parameter have occurred longer than 6 months.

NUMBER OF ACTIONS TAKEN: Notice of Violation (NOV), ADMINISTRATIVE ORDER (A.O.), CIVIL, CRIMINAL

Indicate the number of actions taken during the last pretreatment year. Please indicate in the COMMENTS section how you escalated enforcement for recurring reporting violations or continuing discharge violations of the same parameter, especially if the violations have occurred for longer than 6 months.

NUMBER OF ACTIONS TAKEN: OTHER

Indicate the number of actions taken that may include citations, termination of service, show cause hearings and any other enforcement actions described by your approved program.

PENALTIES COLLECTED Self explanatory.

ENFORCEMENT ACTIONS TAKEN TABLE INSTRUCTIONS

COMPLIANCE SCHEDULE: DATE ISSUED

Self explanatory. In the COMMENTS section please indicate why you placed the SIU on a compliance schedule.

COMPLIANCE SCHEDULE: DATE DUE

Indicate all milestone activities and dates so that you may be certain the time frames described in the federal regulations have not been exceeded.

CURRENT STATUS

Indicate **C** if compliant, **N** if noncompliant and **SNC** if in significant noncompliance with federal and/or program requirements. If the SIU is currently in **SNC,** please provide a brief explanation in the COMMENTS section of why they have not returned to compliance.

COMMENTS

Please summarize any information that is pertinent to the SIU's status of having been in SNC during the last pretreatment year.

TPDES Pretreatment Program Annual Report Form
for Enforcement Actions Taken

Reporting month/year: _____, ____ to _____, ____

TPDES Permit No. _____ Permittee: _____ Treatment Plant : _____ Overall % SNC_____

SIGNIFICANTLY NONCOMPLIANT USERS - ENFORCEMENT ACTIONS TAKEN												
INDUSTRIAL USER	NATURE OF VIOLATION		NUMBER OF ACTIONS TAKEN					PENALTIES COLLECTED	COMPLIANCE SCHEDULE		CURRENT STATUS	COMMENTS
	REPORTS	LIMITS	NOV	A.O.	CIVIL	CRIMINAL	OTHER		DATE ISSUED	DATE DUE		

INDUSTRIAL INVENTORY MODIFICATIONS TABLE INSTRUCTIONS

The Industrial Inventory Modifications List Table is used to summarize the information regarding changes to your pretreatment program during the last pretreatment year. You do not need to include the background information from which your summary is derived. For those pretreatment programs with multiple wastewater treatment plants, a table for each plant needs to be filled out.

When completing this form please use the following guidelines:

FACILITY NAME, ADDRESS AND CONTACT PERSON

Self explanatory. Please arrange alphabetically by facility name.

ADD, CHANGE, DELETE

Please use these terms to indicate the appropriate modification. Changes should only include **significant** changes to your industrial users, including processes, flow rates, and pollutants.

REASON FOR DELETION

When an industrial user has been eliminated from the program, the reason for the elimination must be explained, i.e., no discharge of process wastewater, installed total recycle system, changed to direct discharge, closed down operations, etc.

IF ADDITION OR SIGNIFICANT CHANGE:

PROCESS DESCRIPTION
POLLUTANTS
FLOW RATE

When an industrial user has been added all three columns (process description, pollutants and flow rate) must be filled in.

TPDES Pretreatment Program Annual Report Form
for Industrial Inventory Modifications

Reporting month/year: _____, ____ to _____, ____

TPDES Permit No. _____ Permittee: _____ Treatment Plant: _____

INDUSTRIAL INVENTORY MODIFICATIONS					
FACILITY NAME, ADDRESS AND CONTACT PERSON	ADD, CHANGE, DELETE	IF DELETION:	IF ADDITION OR SIGNIFICANT CHANGE:		
		REASON FOR DELETION	PROCESS DESCRIPTION	POLLUTANTS	FLOW RATE

INFLUENT AND EFFLUENT MONITORING RESULTS TABLE INSTRUCTIONS

Just as a reminder, your NPDES permit requires a specific frequency at which you must test for the 40 CFR part 122 Appendix D Table II and Table III pollutants and submit the results. You must also test and submit results for any toxic or hazardous pollutants that are suspected to be present from Table V and any other pollutant that may adversely affect water quality (30 TAC Chapter 307 regulated pollutants), treatment plant operation or solids disposal procedures. We see many benefits of receiving results of all tested pollutants as many groups within the TNRCC may be using the influent and effluent data.

When your TPDES permit is issued, you will be required to test and submit the results for the 30 TAC Chapter 307 regulated pollutants at the same frequency as the 40 CFR part 122 Appendix D Table II pollutants. If you have not been testing for the 30 TAC Chapter 307 regulated pollutants, you may want to begin negotiations with your contract laboratory. Please see footnotes of the INFLUENT AND EFFLUENT MONITORING RESULTS TABLE for those pollutants that are not required to be tested.

1. All of the required influent and effluent analyses for wastewater treatment plants within the approved pretreatment program that received wastewater from significant industrial users must be submitted. If reporting analyses for more than one plant, please submit the monitoring results table for each plant's data separately.

2. To determine the pollutants and frequency of analyses required for the treatment plant(s), please refer to item two of the "Contributing Industries and Pretreatment Requirements" of the TPDES permit. (If a TPDES permit has not been issued to the POTW, the current NPDES permit contains the analysis schedule.)

3. Do not submit laboratory sheets, laboratory reports, quality control information, or chain of custodies. However, the laboratory information needs to be available for review upon request by the TNRCC.

4. In the influent and effluent actual concentration columns please report the concentration of pollutants in the influent or effluent as reported by the laboratory. The influent and effluent data must be reported in micrograms per liter (μg/l). If the actual concentration is reported as a less than value, please list the Minimum Analytical Level (MAL) that has been measured by the laboratory.

5. The TNRCC MAL must be used for pollutants that the TNRCC has established a MAL. If the TNRCC does not have a MAL for a pollutant, use the EPA Minimum Quantification Level (MQL). See Attachment 4.

6. In order to complete the "Effluent Limit" column, the latest copy of the TexTox printout for each treatment plant is needed. To obtain the latest copy of TexTox, please contact the Pretreatment Team of the TNRCC at (512)239-4433.

INFLUENT AND EFFLUENT MONITORING RESULTS TABLE INSTRUCTIONS

7. To report the dates the influent and effluent samples were collected, please use the "Date" cells.

8. To determine the month that the annual report must be submitted, please refer to item four of the "Contributing Industries and Pretreatment Requirements" of the TPDES/NPDES permit.

9. In order to determine if the effluent limit has been exceeded for the pollutants that have "See [total trihalomethanes] TTHM" in the "Effluent Limit" column, please add the effluent concentrations for Bromoform, Chlorodibromomethane, Chloroform, and Dichlorobromomethane for the same date. This sum will be placed in the TTHM cell. Compare the sum of these four pollutants to the TexTox effluent limit for TTHM to determine if the "Effluent Limit" has been exceeded.

10. Please use the following codes:

AL	Analytical data lost
AD	Analytical data not valid - provide explanation
AT	Sample not taken - provide explanation
AR	Above range of analytical equipment - explanation for retest
AA	Laboratory accident - explanation for retest
AQ	Sample too old to analyze
AH	Headspace in sample
AB	Broken/leaked in transit
AP	Improperly preserved
AV	Insufficient volume
AW	Other - explain

TPDES Pretreatment Program Annual Report Form
for Influent and Effluent Monitoring[1] Results

Reporting month/year: _____, ____ to _____, ____

TPDES Permit No._____ Permittee: _____ Treatment Plant: _____

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
METALS, CYANIDE AND PHENOLS										
Antimony										
Arsenic										
Beryllium										
Cadmium										
Chromium (Total)										
Chromium (Hex)										
Chromium (Tri) [5]										
Copper										
Lead										
Mercury										
Nickel										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
Selenium										
Silver										
Thallium										
Zinc										
Cyanide[6]										
Phenols, Total										
VOLATILE COMPOUNDS										
Acrolein										
Acrylonitrile										
Benzene										
Bromoform						See TTHM				
Carbon Tetrachloride										
Chlorobenzene										
Chlorodibromomethane						See TTHM				
Chloroethane										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
2-Chloroethylvinyl Ether										
Chloroform						See TTHM				
Dichlorobromomethane						See TTHM				
1,1-Dichloroethane										
1,2-Dichloroethane										
1,1-Dichloroethylene										
1,2-Dichloropropane										
1,3-Dichloropropylene										
Ethyl benzene										
Methyl Bromide										
Methyl Chloride										
Methylene Chloride										
1,1,2,2-Tetra-chloroethane										
Tetrachloroethylene										
Toluene										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
1,2-Trans-Dichloroethylene										
1,1,1-Trichloroethane										
1,1,2-Trichloroethane										
Trichloroethylene										
Vinyl Chloride										
ACID COMPOUNDS										
2-Chlorophenol										
2,4-Dichlorophenol										
2,4-Dimethylphenol										
4,6-Dinitro-o-Cresol										
2,4-Dinitrophenol										
2-Nitrophenol										
4-Nitrophenol										
P-Chloro-m-Cresol										
Pentachlorophenol										
Phenol										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
2,4,6-Trichlorophenol										
BASE/NEUTRAL COMPOUNDS										
Acenaphthene										
Acenaphthylene										
Anthracene										
Benzidine										
Benzo(a)Anthracene										
Benzo(a)Pyrene										
3,4-Benzofluoranthene										
Benzo(ghi)Perylene										
Benzo(k)Fluoranthene										
Bis(2-Chloroethoxy) Methane										
Bis(2-Chloroethyl)Ether										
Bis(2-Chloroisopropyl) Ether										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
Bis(2-Ethylhexyl) Phthalate										
4-Bromophenyl Phenyl Ether										
Butylbenzyl Phthalate										
2-Chloronaphthalene										
4-Chlorophenyl Phenyl Ether										
Chrysene										
Dibenzo(a,h)Anthracene										
1,2-Dichlorobenzene										
1,3-Dichlorobenzene										
1,4-Dichlorobenzene										
3,3-Dichlorobenzidine										
Diethyl Phthalate										
Dimethyl Phthalate										
Di-n-Butyl Phthalate										
2,4-Dinitrotoluene										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
2,6-Dinitrotoluene										
Di-n-Octyl Phthalate										
1,2-Diphenyl Hydrazine										
Fluoranthene										
Fluorene										
Hexachlorobenzene										
Hexachlorobutadiene										
Hexachloro-cyclopentadiene										
Hexachloroethane										
Indeno(1,2,3-cd)pyrene										
Isophorone										
Naphthalene										
Nitrobenzene										
N-Nitrosodimethylamine										
N-Nitrosodi-n-Propylamine										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
N-Nitrosodiphenylamine										
Phenanthrene										
Pyrene										
1,2,4-Trichlorobenzene										
PESTICIDES										
Aldrin										
alpha-BHC										
beta-BHC										
gamma-BHC										
delta-BHC										
Chlordane										
4,4-DDT										
4,4-DDE										
4,4-DDD										
Dieldrin										
alpha-Endosulfan										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
beta-Endosulfan										
Endosulfan Sulfate										
Endrin										
Endrin Aldehyde										
Heptachlor										
Heptachlor Epoxide										
PCB-1242										
PCB-1254										
PCB-1221										
PCB-1232										
PCB-1248										
PCB-1260										
PCB-1016										
Toxaphene										
ADDITIONAL TOXIC POLLUTANTS REGULATED UNDER 30 TAC CHAPTER 307										
Aluminum										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
Barium										
Bis(chloromethyl) ether[7]										
Carbaryl										
Chloropyrifos										
Cresols										
2,4-D										
Danitol[8]										
Demeton										
Diazinon										
Dicofol										
Dioxin/Furans[9]										
Fluoride										
Guthion										
Hexachlorophene										
Malathion										
Methoxychlor										

PRETREATMENT PROGRAM INFLUENT AND EFFLUENT MONITORING RESULTS										
POLLUTANT	MAHL[2], IF APPLICABLE IN µg/L	INFLUENT ACTUAL CONCENTRATION OR MAL MEASURED IN µg/L				EFFLUENT LIMIT[3] IN µg/L	EFFLUENT ACTUAL CONCENTRATION OR MAL MEASURED in µg/L[4]			
		DATE	DATE	DATE	DATE		DATE	DATE	DATE	DATE
Methyl Ethyl Ketone										
Mirex										
Nitrate-Nitrogen										
N-Nitrosodiethylamine										
N-Nitro-di-n-Butylamine										
Parathion										
Pentachlorobenzene										
Pyridine										
1,2-Dibromoethane										
1,2,4,5-Tetrachlorobenzene										
2,4,5-TP (Silvex)										
Tributyltin[9]										
2,4,5-Trichlorophenol										
TTHM (Total Trihalomethanes)										

Footnotes:

1. It is advised that the permittee collect the influent and effluent samples considering flow detention time through each plant.

2. Maximum Allowable Headworks Loading Limitation in μg/l, only complete for pollutants that have approved technically based local limits.

3. Daily average effluent limit as derived by the Texas Toxicity Modeling Program (TexTox). Effluent limits as calculated are designed to be protective of the Texas Surface Water Quality Standards. Shaded blocks need not be filled in unless the Permittee has received a permit requirement/limit for the particular parameter.

4. Minimum Analytical Levels and suggested analytical methods may be located in Table 1 of Attachment D of permittee's wastewater permit application.

5. Report result by subtracting Hexavalent Chromium from Total Chromium.

6. Cyanide, Amenable to Chlorination or Weak-Acid Dissociable methods.

7. Hydrolyzes in water. Will not require permittee to analyze at this time.

8. EPA procedure not approved. Will not require permittee to analyze at this time.

9. Analyses are not required at this time for these pollutants unless there is reason to believe that these pollutants may be present.

TPDES Pretreatment Program Annual Report Form
for Enforcement Actions Taken

Reporting month/year: _____, ____ to _____, ____

TPDES Permit No. _____ Permittee: _____ Treatment Plant : _____ Overall % SNC_____

SIGNIFICANTLY NONCOMPLIANT USERS - ENFORCEMENT ACTIONS TAKEN												
INDUSTRIAL USER	NATURE OF VIOLATION		NUMBER OF ACTIONS TAKEN					PENALTIES COLLECTED	COMPLIANCE SCHEDULE		CURRENT STATUS	COMMENTS
	REPORTS	LIMITS	NOV	A.O.	CIVIL	CRIMINAL	OTHER		DATE ISSUED	DATE DUE		

Attachment 3: Technically Based Local Limit (TBLL) Certification Statement and Reassessment of TBLL Form with Instructions

CERTIFICATION STATEMENT FOR PRETREATMENT PROGRAM
TECHNICALLY BASED LOCAL LIMITS (TBLLs)

"I, _____, the _____ and authorized representative of _____ hereby certify under penalty of law that the Technically Based Local Limits provided with this statement were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my review of the Local Limits hereby provided and my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I further certify that the Local Limits submitted are adequate to prevent; (1) pass through of pollutants which cause exceedances of applicable water quality standards after adjustment for low-flow stream dilution, (2) inhibition or interference, (3) worker health and safety problems and/or (4) sludge contamination which causes exceedances of applicable standards. Neither this certification nor the proper development and implementation of the Local Limits shall provide relief from compliance with all applicable standards or act as a waiver of liability, including liability resulting from such pass through, inhibition or interference, worker health and safety problems and/or sludge contamination."

_____ _____

Signature Date

This certification may be used by POTWs submitting TBLLs for review and approval during the development of a new Pretreatment Program and also during the modification process of an approved Pretreatment Program.

Reassessment of Technically Based Local Limits(TBLLs)

Attached is a form designed to assist in the assessment of the need to revise Technically Based Local Limits (TBLLs). As required in 30 Texas Administrative Code Chapter 315 and 40 CFR 122.21(j)(4) by reference, **all POTWs with approved pretreatment programs shall provide the following information to the [Executive] Director of the TNRCC: a written evaluation of the need to revise local limits under 40 CFR 403.5(c)(1).** This evaluation is required as part of the application process for expiring TPDES Permits. The form supplied allows both the permittee and the TNRCC Pretreatment team a comparison of the pertinent information utilized in the previous development of local limits to current conditions at the POTW.

NOTE: FILL OUT A SEPARATE FORM FOR EACH TREATMENT PLANT.

When completing the form please utilize the following guidelines:

Item I - Actual flow should be the average daily flow during the last 12 month period. Be sure to indicate the appropriate means of determining the SIU and POTW flows (measured/ estimated).

If a critical dilution or percent of total stream flow attributable to the POTW's design discharge flow at low flow conditions in the stream was utilized during the last TBLL development, indicate the appropriate percentage for previous and current conditions. If a critical dilution was not used, indicate the previous application's design discharge flow and the current application's design flow. In addition critical (low) and mean streamflow should be listed.

Items II to IV - Self explanatory

Item V - From the results of all sampling/analyses of priority pollutants conducted in accordance with 40 CFR Part 136, determine the average pounds per day of pollutants at the facility's influent, and the maximum pounds received in any one day. If older data is not representative of current conditions, use the last two years of data. From the previously developed local limits indicate the maximum pounds per day of pollutants that you predicted the POTW can receive.

Item VI - Similar to Item V, the effluent data must be collected and analyzed in accordance with 40 CFR Part 136 and to a detection limit equivalent to the TNRCC Minimum Analytical Levels (MAL). Indicate the effluent limits reported on the TexTox Modeling program's Average Daily Discharge Limits which are based on the Texas Surface Water Quality Standards. These limits should be adjusted to reflect any **site specific** criteria such as dilution factor, partitioning coefficient and/or Total Maximum Daily Load (TMDL) allocations. You may request this information from the TNRCC Water Quality Standards team (MC 150) Water Quality Division.

Item VII - Self Explanatory

Item VIII - Analyses of inorganic pollutants in sludge are covered in Part 503 which requires SW-846 (solid waste) methods. Indicate whether the results are in total dry weight or TCLP concentration. Be sure to indicate the current applicable regulation for the facility's sludge disposal.

In general, be sure the units reported are correct. Where there are circumstances which you feel are

important in your evaluation of current local limits, please include all the pertinent information with the submittal. When averaging data where the analysis indicates the concentration is below detection limits, make a notation of the method you used (i.e. averaging at detection limits or half-detection limits).

Items IX to XI - Self explanatory

If you have any questions, please contact your pretreatment representative of the TNRCC's Pretreatment team (MC148) Water Quality Division at (512) 239-4433.

Reassessment of Technically Based Local Limits(TBLLs)

****PLEASE FILL OUT A SEPARATE FORM FOR EACH PLANT****

POTW name _____

TPDES Permit No. _____

Date of EPA/TNRCC Approval of Existing TBLLs/Effective date of ordinance modification:
_____/_____

I. Utilizing all POTW flow data collected since the TBLLs were adopted and from the TBLLs documentation, complete the following:

TABLE 1. COMPARISON OF FLOW DATA AND OTHER CONSTRAINTS UNDER EXISTING PROGRAM (TBLLs) VS. CURRENT CONDITIONS.

	Existing TBLLs		**Current Conditions**	
Actual POTW Flow (MGD)	MGD (measured)	MGD (estimated)	MGD (measured)	MGD (estimated)
SIU Flow (MGD)	MGD (measured)	MGD (estimated)	MGD (measured)	MGD (estimated)
Critical Dilution (%) OR Design Flow (MGD), 7Q2 (cfs)and Harmonic Mean (cfs) Streamflow used for TexTox	%	MGD	%	MGD
	CFS		CFS	
	CFS		CFS	
Safety Factor Used	%			
Number of SIUs				
Sludge Disposal Method(s)				
Hauled Wastes Accepted	Domestic	Other	Domestic	Other

MGD - Million gallons per day
CFS - Cubic feet per second

Reassessment of Technically Based Local Limits(TBLLs)

II. List all pollutants for which TBLLs were previously developed and adopted:

_____

_____

_____

III. How were the existing local limits allocated?

- ❒ Uniform concentration
- ❒ Contributory flow
- ❒ Mass proportioning
- ❒ Other (specify)

IV. Has the POTW experienced any upsets, inhibition, Interference, or Pass Through since the existing TBLLs were implemented?

If Yes, please explain, giving dates, duration and POTW's actions:

_____

_____

Reassessment of Technically Based Local Limits(TBLLs)

V. Utilizing all POTW influent analyses conducted since the TBLLs were adopted and from the TBLLs documentation, complete the following:

TABLE 2. COMPARISON OF INFLUENT DATA UNDER EXISTING PROGRAM (TBLLs) VS. APPROVED MAXIMUM ALLOWABLE HEADWORKS LOADING.

	From Influent Analyses		From Approved Previous TBLL Submittal
Pollutant	**Maximum (lbs/day)**	**Average (lbs/day)**	**Maximum headworks allowance (MAHL) (lbs/day)**
Arsenic			
Cadmium			
Chromium			
Copper			
Cyanide			
Lead			
Mercury			
Nickel			
Silver			
Zinc			
Molybdenum			
Selenium			
Other			

NOTE: All metals are TOTAL unless otherwise indicated.

Reassessment of Technically Based Local Limits(TBLLs)

VI. Utilizing all POTW effluent analyses conducted since the TBLLs were adopted, the TBLLs documentation and **current** Texas Surface Water Quality Standards, complete the following:

TABLE 3. COMPARISON OF EFFLUENT DATA UNDER EXISTING PROGRAM (TBLLs) VS. CURRENT TPDES DAILY AVERAGE EFFLUENT DISCHARGE LIMITS.

	From Effluent Analyses		From TexTox Daily Average Effluent Limits	
Pollutant	**Maximum (ug/L)**	**Average (ug/L)**	**From Approved Previous TBLL Submittal (ug/L)**	**Current (ug/L)**
Arsenic				
Cadmium				
Chromium				
Copper				
Cyanide				
Lead				
Mercury				
Nickel				
Silver				
Zinc				
Molybdenum				
Selenium				
Other				

NOTE: All metals are TOTAL unless otherwise indicated.

VI. Indicate which year the current Texas Surface Water Quality Standards were adopted or year any site specific standards were adopted.

Reassessment of Technically Based Local Limits(TBLLs)

VIII. Utilizing POTW sludge analyses conducted since the TBLLs were adopted and from current regulations (cite applicable state and/or federal regulation in the brackets), complete the following and indicate whether results are in total dry weight **(mg/kg)** or for Toxicity Characteristic Leaching Procedure (TCLP) results in concentrations **(mg/l)**. Please specify the regulation and analytical units in the blank provided:

TABLE 4. COMPARISON OF SLUDGE DATA UNDER EXISTING PROGRAM (TBLLs) MAXIMUM CONCENTRATIONS.

	From Sludge Analyses		**From Current Regulations [ ] (/)**
Pollutant	**Maximum (/)**	**Average (/)**	
Arsenic			
Cadmium			
Chromium			
Copper			
Cyanide			
Lead			
Mercury			
Nickel			
Silver			
Zinc			
Molybdenum			
Selenium			
Other			

NOTE: All metals are TOTAL unless otherwise indicated.

Reassessment of Technically Based Local Limits(TBLLs)

IX. If any industries have been added or deleted from the list of SIUs since the **existing TBLLs** were adopted, list the industries below and indicate when the SIU was added or deleted, daily discharge volume and the pollutants the industry is/was permitted to discharge.

TABLE 5. SIGNIFICANT INDUSTRIAL USERS ADDED/DELETED SINCE EXISTING TBLLS WERE FIRST ADOPTED.

Industry Name	Added	Deleted	Daily discharge (gal/day)	Pollutants Permitted to Discharge

X. Have any PUBLIC EDUCATION (Household Hazardous Wastes, Pollution Prevention Best Management Practices, etc.) activities concerning appropriate discharge of commercial and/or residential wastes to the sanitary sewer been promote since the existing TBLLs were developed?

If Yes, provide details:

_____

_____

XI. Are there any other significant differences that may have an effect on the validity of the existing TBLLs? (e.g. changes in TPDES limits, changes in treatment processes, changes to hauled waste acceptance procedures, etc.)

If Yes, provide details:

_____

_____

Attachment 4: TNRCC's Minimum Analytical Levels and EPA Region 6's Minimum Quantification Levels

Table 7. TNRCC Minimum Analytical Levels for Application Screening

Pollutant	CASRN*	MAL ug/l	Suggested Method
Aldrin	309-00-2	0.05	608
Alphahexachlorocyclohexane	319-84-6	0.05	608
Aluminum	7429-90-5	30	202.2
Arsenic	7440-38-2	10	206.2
Barium	7440-39-3	10	208.2
Benzene	71-43-2	10	624
Benzidine	92-87-5	50	625
Benzo [a] anthracene	56-55-3	10	625
Benzo [a] pyrene	50-32-8	10	625
Betahexachlorocyclohexane	319-85-7	0.05	608
Bis(chloromethyl)ether	542-88-1	**	**
Cadmium	7440-43-9	1	213.2
Carbon Tetrachloride	56-23-5	10	624
Carbaryl	63-25-2	5	632
Chlordane	57-74-9	0.15	608
Chlorobenzene	108-90-7	10	624
Chloroform	67-66-3	10	624
Chloropyrifos	2921-88-2	0.05	1657
Chromium	7440-47-3	10	218.2
Hexavalent Chromium	7440-47-3	10	218.4
Trivalent Chromium	7440-47-3	***	***
p-Chloro-m-Cresol	59-50-7	10	625
4,6-Dinitro-o-Cresol	534-52-1	50	625
p-Cresol	106-44-5	10	625

Table 7. TNRCC Minimum Analytical Levels for Application Screening (con't)

Pollutant	CASRN*	MAL ug/l	Suggested Method
Copper	7440-50-8	10	220.2
Chrysene	218-01-9	10	625
Total Cyanide	57-12-5	20	335.2
Cyanide, Amenable to Chlorination	57-12-5	20	335.1
Cyanide, Weak Acid Dissociable	57-12-5	20	4500-CN I.
4,4'-DDD	72-54-8	0.1	608
4,4'-DDE	72-55-9	0.1	608
4,4'-DDT	50-29-3	0.1	608
2,4-D	94-75-7	10	615
Danitol	39515-41-8	****	****
Demeton	8065-48-3	0.20	1657
Diazinon	333-41-5	0.5	1657
Dibromochloromethane	124-48-1	10	624
1,2-Dibromoethane	106-93-4	2	618
Dieldrin	60-57-1	0.1	608
1,4-Dichlorobenzene	106-46-7	10	625
1,2-Dichloroethane	107-06-2	10	624
1,1-Dichloroethylene	75-35-4	10	624
Dicofol	115-32-2	20	617

Table 7. TNRCC Minimum Analytical Levels for Application Screening (con't)

Pollutant	CASRN*	MAL ug/l	Suggested Method
Dioxins/Furans (TCDD Equivalents)			
2,3,7,8-TCDD	1746-01-6	10^{-5} or	1613
1,2,3,7,8-PeCDD	40321-76-4	ppq	
2,3,7,8-HxCDDs		50	
1,2,3,4,7,8-HxCDD	39227-28-6		
1,2,3,6,7,8-HxCDD	57653-85-7	50	
1,2,3,7,8,9-HxCDD	19408-74-3	50	
2,3,7,8-TCDF	51207-31-9	50	
1,2,3,7,8-PeCDF	57117-41-6	10	
2,3,4,7,8-PeCDF	57117-31-4	50	
2,3,7,8-HxCDFs		50	
1,2,3,4,7,8-HxCDF	70648-26-9		
1,2,3,6,7,8-HxCDF	57117-44-9	50	
1,2,3,7,8,9-HxCDF	72918-21-9	50	
2,3,4,6,7,8-HxCDF	60851-34-5	50	
		50	
Endosulfan I (Alpha)	115-29-7	0.1	608
Endosulfan II (Beta)	115-29-7	0.1	608
Endosulfan sulfate	1031-07-8	0.1	608
Endrin	72-20-8	0.1	608
Fluoride	16984488	500	340.3
Gammahexachlorocyclo-hexane (Lindane)	58-89-9	0.05	608
Guthion	86-50-0	0.1	1657
Heptachlor	76-44-8	0.05	608
Heptachlor Epoxide	1024-57-3	1.0	608
Hexachlorobenzene	118-74-1	10	625
Hexachlorobutadiene	87-68-3	10	625
Hexachloroethane	67-72-1	20	625

Table 7. TNRCC Minimum Analytical Levels for Application Screening (con't)

Pollutant	CASRN*	MAL ug/l	Suggested Method
Hexachlorophene	70-30-4	10	604.1
Lead	7439-92-1	5.0	239.2
Malathion	121-75-5	0.1	1657
Mercury	7439-97-6	0.2	245.1
Methoxychlor	72-43-5	2.0	617
Methyl Ethyl Ketone	78-93-3	50	624
Mirex	2385-85-5	0.2	617
Nitrate-Nitrogen	14797-55-8	1000	352.1
Nickel	7440-02-0	10	249.2
Nitrobenzene	98-95-3	10	625
N-Nitrosodiethylamine	55-18-5	20	625
N-Nitroso-di-n-Butylamine	924-16-3	20	625
Parathion	56-38-2	0.1	1657
Pentachlorobenzene	608-93-5	20	625
Pentachlorophenol	87-86-5	50	625
Phenanthrene	85-01-8	10	625
Polychlorinated Biphenyls (PCBs) PCB-1232 PCB-1242 PCB-1254 PCB-1221 PCB-1248 PCB-1260 PCB-1016	 1336-36-3 1336-36-3 1336-36-3 1336-36-3 1336-36-3 1336-36-3 1336-36-3	 1.0 1.0 1.0 1.0 1.0 1.0 1.0	608
Pyridine	110-86-1	20	625
Selenium	7782-49-2	10.0	270.2

Table 7. TNRCC Minimum Analytical Levels for Application Screening (con't)

Pollutant	CASRN*	MAL ug/l	Suggested Method
Silver	7440-22-4	2.0	272.2
1,2,4,5-Tetrachlorobenzene	95-94-3	20	625
Tetrachloroethylene	127-18-4	10	624
Toxaphene	8001-35-2	5.0	608
2,4,5-TP (Silvex)	93-72-1	2.0	615
Tributyltin	688-73-3	0.010	TNRCC 1001
2,4,5-Trichlorophenol	95-95-4	50	625
Trichloroethylene	79-01-6	10	624
1,1,1-Trichloroethane	71-55-6	10	624
TTHM (Total) Chloroform Bromoform Dichlorobromomethane Chlorodibromomethane	 67-66-3 75-25-2 75-27-4 124-48-1	 10 10 10 10	624
Vinyl Chloride	75-01-4	10	624
Zinc	7440-66-6	5.0	289.2

*Chemical Abstracts Service Registry Number
**Hydrolyzes in water. Will not require applicant to analyze at this time.
***Trivalent chromium (Cr) determined by subtracting hexavalent Cr from total Cr.
****EPA procedure not approved. Will not require applicant to analyze at this time.

MINIMUM QUANTIFICATION LEVELS (MQLs)
and
MINIMUM ANALYTICAL LEVELS (MALs)
(TEXAS PERMITS)

METALS, CYANIDE, AND TOTAL PHENOLS
METALS ARE EXPRESSED AS TOTAL METALS

Pollutant	REQUIRED MQL ug/l	EPA Test Method
* Aluminum	20	202.2
Antimony	20	204.2
* Arsenic	10	206.2
* Barium	10	208.2
Beryllium	20	210.2
* Cadmium	1	213.2
* Chromium	5	218.2
* Chromium (III)	*2	*2
* Chromium (VI)	10	218.4
* Copper	10	220.2
* Cyanide *3	20	335.1
* Lead	5	239.2
* Mercury	0.2	245.1
Molybdenum	30	200.7
* Nickel	10	249.2
* Selenium	5	270.2
* Silver	2	272.2
Thallium	10	279.2
* zinc	5	289.2
* Total Phenols	5	420.1

VOLATILE COMPOUNDS

Pollutant	REQUIRED MQL ug/l	EPA Test Method
Acrolein	50	624
Acrylonitrile	50	624
* Benzene	10	624
Bromodichloromethane	10	624
Bromoform	10	624
* Carbon Tetrachloride	10	624
* Chlorobenzene	10	624
Chloroethane	10	624
2-Chloroethyl vinyl ether	50	624
* Chloroform	10	624
* Dibromochloromethane	10	624
1,1-Dichloroethane	10	624
* 1,2-Dichloroethane	10	624
* 1,1-Dichloroethylene	10	624
1,2-Dichloropropane	10	624
1,3-Dichloropropene	10	624
Ethylbenzene	10	624
Methyl Bromide	20	624
Methyl Chloride	20	624
Methylene Chloride	20	624
1,1,2,2-Tetrachloroethane	10	624
* Tetrachloroethylene	10	624
Toluene	10	624
1,2-trans-Dichloroethylene	10	624
* 1,1,1-Trichloroethane	10	624
1,1,2-Trichloroethane	10	624
* Trichloroethylene	10	624
* Vinyl Chloride	10	624

MINIMUM QUANTIFICATION LEVELS (MQLs)
and
MINIMUM ANALYTICAL LEVELS (MALs)
(TEXAS PERMITS)

ACID COMPOUNDS

Pollutant	REQUIRED MQL ug/l	EPA Test Method
2-Chlorophenol	10	625
4-Chloro-3-Methyl Phenol	10	625
2,4-Dichlorophenol	10	625
2,4-Dimethylphenol	10	625
2,4-Dinitrophenol	50	625
4,6-Dinitro-o-Cresol (4,6-Dinitro-o-phenol)	20	625
2-Nitrophenol	20	625
4-Nitrophenol	50	625
Phenol	10	625
* Pentachlorophenol	50	625
2,4,6-Trichlorophenol	10	625

PESTICIDES

Pollutant	REQUIRED MQL ug/l	EPA Test Method
* Aldrin	0.05	608
* Chlordane	0.15	608
* DDD	0.1	608
* DDE	0.1	608
* DDT	0.1	608
* Dieldrin	0.1	608
* Endosulfan-Alpha	0.1	608
* Endosulfan-Beta	0.1	608
Endosulfan sulfate	0.1	608
* Endrin	0.1	608
Endrin aldehyde	0.1	608
* Heptachlor	0.05	608
* Heptachlor Epoxide	1	608
* Hexachlorocyclohexane-alpha (BHC-Alpha)	0.05	608
* Hexachlorocyclohexane-beta (BHC-Beta)	0.05	608
Hexachlorocyclohexane-Delta (BHC-Delta)	0.05	608
* Hexachlorocyclohexane-gamma (Lindane)	0.05	608
* PCB-1242	1.0	608
* PCB-1254	1.0	608
* PCB-1221	1.0	608
* PCB-1232	1.0	608
* PCB-1248	1.0	608
* PCB-1260	1.0	608
* PCB-1016	1.0	608
* Toxaphene	5	608

MINIMUM QUANTIFICATION LEVELS (MQLs)
and
MINIMUM ANALYTICAL LEVELS (MALs)
(TEXAS PERMITS)

BASE/NEUTRAL COMPOUNDS

Pollutant	REQUIRED MQL ug/l	EPA Test Method
Acenaphthene	10	625
Acenaphthylene	10	625
Anthracene	10	625
* Benzidine	50	625
Benzo(a)anthracene	10	625
3,4-Benzofluoranthene	10	625
Benzo(k) fluoranthene	10	625
Benzo(a)pyrene	10	625
Benzo(ghi)perylene	20	625
Benzyl butyl Phthalate	10	625
Bis(2-chloroethyl) ether	10	625
Bis(2-chloroethoxy) methane	10	625
Bis(2-Ethylhexyl) Phthalate	10	625
Bis(2-chloroisopropyl) ether	10	625
4-Bromophenyl phenyl ether	10	625
2-Chloronapthalene	10	625
4-Chlorophenyl phenyl ether	10	625
Chrysene	10	625
Dibenzo (a,h) anthracene	20	625
Di-n-Butyl Phthalate	10	625
1,2-Dichlorobenzene	10	625
1,3-Dichlorobenzene	10	625
* 1,4-Dichlorobenzene p-Dichlorobenzene	10	625
3,3-Dichlorobenzidine	50	625
Diethyl Phthalate	10	625
Dimethyl Phthalate	10	625
2,4-Dinitrotoluene	10	625
2,6-Dinitrotoluene	10	625
Di-n-octyl Phthalate	10	625
1,2-Diphenylhydrazine	20	625
Fluoranthene	10	625
Fluorene	10	625
* Hexachlorobenzene	10	625
* Hexachlorobutadiene	10	625
Hexachlorocyclo-pentadiene	10	625
* Hexachloroethane	20	625
Indeno (1,2,3-cd) pyrene	20	625
Isophorone	10	625
Naphthalene	10	625
* Nitrobenzene	10	625
N-Nitrosodimethylamine	50	625
N-nitrosodiphenylamine	20	625
N-nitrosodi-n-propylamine	20	625
* Phenanthrene	10	625
Pyrene	10	625
1,2,4-Trichlorobenzene	10	625

MINIMUM QUANTIFICATION LEVELS (MQLs)
and
MINIMUM ANALYTICAL LEVELS (MALs)
(TEXAS PERMITS)

HAZARDOUS SUBSTANCES

Pollutant	REQUIRED MQL ug/l	EPA Test Method
* Carbaryl	5	632
* Chloropyrifos	0.05	1657
* Cresols	10	625
* Diazinon	0.5	1657
* 2,4-D	10	615
* Dicofol (Kelthane)	20	617
* Dioxins/Furans	*4	*4
* Guthion	0.1	1657
* Malathion	0.1	1657
* Methoxychlor	2	617
* Parathion	0.1	1657
* 2,4,5-TP (Silvex)	2	615

MISCELLANEOUS SUBSTANCES

Pollutant	REQUIRED MQL ug/l	EPA Test Method
* Bis(chloromethyl) ether	*5	*5
* Danitol	*6	*6
* Demeton	0.2	1657
* 1,2-Dibromoethane	5	624
* Fluoride	500	340.3
* Hexachlorophene	20	625
* Methyl Ethyl Ketone	50	624
* Mirex	0.2	608
* Nitrate-Nitrogen	1000	352.1
* N-Nitrosodiethylamine	20	625
* N-Nitrosodi-n-butylamine	20	625
* Pentachlorobenzene	20	625
* Pyridine	20	625
* 1,2,4,5-Tetrachloro-benzene	20	625
* Tributyltin	*6	*6
* 2,4,5-Trichlorophenol	50	625
* Total Trihalomethanes	10	624

FOOTNOTES:

* - The TWC has established **Minimum Analytical Levels (MALs)** for these pollutants for determining potential existence of the pollutant in the discharge and for evaluating potential exceedance of the applicable water quality standards.

All other pollutants have **Minimum Quantification Levels (MQLs)**, as developed by EPA, Region 6.

*2 - Trivalent chromium (Chromium III) will be determined by subtracting hexavalent chromium (Chromium VI) from total chromium.

*3 - Cyanide shall be tested and reported as Cyanide, as amenable to chlorination.

*4 - The TNRCC has determined that municipal facilities are not required to test for this

pollutant at this time.

*5 - Hydrolyzes in water. The permittee is not required to analyze this pollutant at this time.

*6 - EPA approved analytical method is not available. The permittee is not required to analyze this pollutant at this time.

Attachment 5: Required Quality Assurance and Quality Control for Sampling

BASIC INVESTIGATOR TRAINING

SAMPLE COLLECTION QUALITY ASSURANCE

- **ASSURES REPRESENTATIVE SAMPLES**
- **ASSURES QUALITY OF FIELD DATA**
- **ASSURES QUALITY OF LABORATORY DATA**
- ***REDUCES THE POTENTIAL FOR CHALLENGES***

BASIC INVESTIGATOR TRAINING

MINIMUM SAMPLING QC REQUIREMENTS

- **REQUIRED FREQUENCY OF COLLECTION**
  - TRIP BLANKS
  - FIELD (REAGENT) BLANKS
  - EQUIPMENT (RINSEATE) BLANKS
  - FIELD DUPLICATES
  - SPLIT SAMPLES (OPTIONAL/NOT REQUIRED)
  - SPIKED SAMPLES (OPTIONAL/NOT REQUIRED)

BASIC INVESTIGATOR TRAINING

MINIMUM **SAMPLING QC REQUIREMENTS**

- REQUIRED FREQUENCY OF COLLECTION
  - **ONCE PER MONTH OR EVERY 10TH SAMPLE COLLECTED (*WHICHEVER OCCURS SOONER*)**
  - **PER INSPECTOR**
  - **PER PROGRAM**
  - **PER MATRIX (LIQUIDS, SOLIDS, ETC)**

BASIC INVESTIGATOR TRAINING

MINIMUM **SAMPLING QC REQUIREMENTS**

- EQUIPMENT (RINSEATE) BLANKS
  - **AUTO SAMPLERS (COMPOSITORS)**
  - **BAILERS**
  - **BUCKETS**
- FIELD DUPLICATES
  - **MUST BE COLLECTED SIMULTANEOUSLY**

BASIC INVESTIGATOR TRAINING

MINIMUM SAMPLING QC REQUIREMENTS

- **TRIP BLANKS**
  - **VOA SAMPLES ONLY**
- **FIELD (REAGENT) BLANKS**
  - **PHYSICAL (REFRIGERATION)**
  - **CHEMICALS (ACIDS, BASES, SALTS)**

BASIC INVESTIGATOR TRAINING

OPTIONAL QC SAMPLING (NOT REQUIRED)

- **SPLIT SAMPLES**
  - ***ALWAYS*** **OFFER A SPLIT TO PERMITTEES**
  - ***OCCASSIONALLY*** **USED TO CHECK LAB PROCEDURES**
  - **MAY BE ANALYSED BY *SAME OR DIFFERENT* LAB**

BASIC INVESTIGATOR TRAINING

OPTIONAL QC SAMPLING (NOT REQUIRED)

- **SPIKED SAMPLES**
  - ***USED SOLELY*** TO CHECK LABORATORY PROCEDURES
  - ***REQUIRES*** USE OF REFEREE LAB
  - ***NOTIFY TNRCC LABORATORY QUALITY ASSURANCE OFFICER***

Attachment 6: TNRCC Guidelines and EPA Region 6's Checklists for Program Modifications

GENERAL PROCEDURES FOR MODIFYING EXISTING PRETREATMENT PROGRAMS

There are many instances when a POTW must modify their existing pretreatment program. Their local limits may need to be revised to address changes in SIUs or the treatment facility. The POTW's TPDES permit may include new effluent discharge limits for which local limits must be developed. The POTW may reassess their local limits and discover their local limits are no longer adequate. An audit may have uncovered problems in the approved program that were not the fault of the POTW. An audit may have revealed problems of sufficient magnitude to require the modification of the program.

Submittals of substantial program modifications should be sent to the Pretreatment Team at this address:

Mail:

TNRCC
Water Quality Division (MC148)
P.O. Box 13087
Austin, Texas 78711-3087

Federal Express:

TNRCC, Building F
2nd floor, Room 2101
12100 Park 35 Circle
Austin, Texas 78753.

The pretreatment team does not accept partial submittals. Prior to the program modification submittal, the pretreatment will assist the POTW whenever possible.

When the pretreatment team staff is conducting the program modification review, problems and concerns will be documented to include the location of the problem in the submittal and the nature of the problem or concern. We may provide recommendations to the POTW of items not included in draft submittals.

SPECIFIC GUIDELINES

If you have utilized EPA's Model Ordinance, make sure you have inserted your program's applicable names and titles in the submittal. There are sections in the Model Ordinance that need a specific name and/or title for the POTW.

Your submittal may or may not follow the Model Ordinance. Please indicate the section on the attached checklists where information may be found in your ordinance, enforcement response plan (ERP) and standard operating procedures. As long as the information is correctly addressed, it may shorten the time of review.

Verify that your permits, applications and other forms are consistent with laws, the ordinance, and the program. For example if your Ordinance states that all SIUs must monitor local limits

quarterly, make certain the permit states that local limits must be monitored quarterly as well. Verify that procedures are not contrary to your Ordinance or ERP.
Enforcement responses are limited to those authorized under State law and implemented through your Sewer Use Ordinance.

USEFUL TOOLS

EPA Industrial User Permitting Guidance Manual - Contains guidance on the development and issuance of effective permits as well as a sample permit.

EPA Model Pretreatment Ordinance - Provided by EPA for developing or improving a POTW's legal authority. It contains all the required aspects of an ordinance as well as additional recommendations.

EPA Guidance for Developing Control Authority Enforcement Response Plans - Contains recommendations for assessing enforcement authorities, determining appropriate enforcement roles for personnel and deciding upon enforcement remedies for specific violations. The guidance contains a model enforcement response guide and analysis of common enforcement remedies.

EPA Guidance Manual for POTW Pretreatment Program Development - Contains procedures for a POTW to develop an approvable program and what data and information must be included in the submittal to the Control Authority. It contains an Industrial Waste Survey form, compliance sampling, resources/funding and TBLLs discussion.

EPA Industrial Users Inspection and Sampling Manual for POTWs - Provides step-by-step sampling and inspections processes. This manual is useful to check if your procedures are logical and sufficient for quality assurance and quality control.

EPA Region 6 Guidance with Reference to Substantial/Nonsubstantial Modifications of a Control Authorities Control Mechanism - Defines substantial and nonsubstantial modifications of a permit.

Federal Register, July 17, 1997, Pages 38405 through 38415 - Contains the revised language and explanation of the 40 CFR 403.18 language for substantial program modifications.

Pretreatment Program Modification Narrative Description - Contains a narrative and flow chart of the modification process utilized by EPA.

EPA Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program - Contains a narrative and calculations for the

development of technically based local limits.

EPA Region 6 Technically Based Local Limits Development Guidance

Prelim Version 4.0 User's Guide - This is not the current version or Prelim, but most of the information is applicable for running Prelim to calculate TBLLs in the program modification.

CHECKLISTS

Legal Authority - The blank checklist contains most regulatory citations where information is specifically required by law. You should include notes referencing where in your ordinance the requested information is located. Some narrative queries are also included on the checklist.

ERP - Keep in mind that your ERP should have sufficient range of options in order to effectively enforce your approved program. The ERP should not create obstacles to effective enforcement. Make certain the enforcement response guide contains timetables for each specific enforcement action and the person(s) responsible for those actions.

TECHNICALLY BASED LOCAL LIMITS

Technically Based Local Limits - In determining if the local limits are protective of the POTW, the receiving stream, and sludge disposal options, please use the above referenced manual for development of TBLLs. Remember that TBLLs must be developed in such a manner as to be defensible in enforcement proceedings or judicial actions. Upon request, the pretreatment team will supply you with the TexTox modeling program results for TPDES limits. PLEASE CONTACT THE PRETREATMENT TEAM at (512)239-4433 FOR ALL INFORMATION YOU WILL NEED TO SUBMIT TO RUN PRELIM.

NEW PROGRAM PROCEDURES

If your POTW is required to develop a formal pretreatment program, the requirement will be contained in your TPDES permit. The language establishes specific milestones and time frames in which to accomplish these milestones.

In general, the permittee will submit information in a new, renewal or amendment permit application. If the permittee indicates that categorical industrial users discharge to them, or they have experienced operational and/or compliance problems due to industrial users, they may be required to develop a pretreatment program. The regulatory citation for POTWs to develop a pretreatment program can be found in 40 CFR 403.8(a) - (c). The following is a summary of the steps leading to the formal approval of a pretreatment program. The final approvable package is due 12 months after the effective date of notification to continue pretreatment program development.

GENERAL PROCEDURES FOR MODIFYING EXISTING PRETREATMENT PROGRAMS

1. The permittee will be asked 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 TNRCC 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.

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 notification to continue pretreatment program development.

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 notification to continue pretreatment program development.

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. 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. This information is due 6 months from the effective date of notification to continue pretreatment program development.

5. The POTW is required to submit to the TNRCC an approvable technically based local limits package. The local limits should be developed according to "EPA Region 6 Technically Based Local Limits Development Guidance." This information is due 9 months from the effective date of notification to continue pretreatment program development.

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; multijurisdictional documents; an enforcement response plan. This information is due 10 months after the effective date of notification to continue pretreatment program development.

7. The POTW must submit a complete, approvable program. This will be a compilation of all previously submitting program activities, amended and supplemented as necessary. This information is due 12 months from the effective date of notification to continue pretreatment program development.

CHECKLIST FOR THE DEVELOPMENT OR MODIFICATION OF A PRETREATMENT PROGRAM

NAME OF THE POTW:
DATE:

SECTION/PAGE OF PROGRAM

A. Industrial User Survey [403.8(f)(2)(i)]

   a. Sources used to determine the addition of new industries _____
   b. Methods for doing a survey _____
   c. Survey form utilized _____
   d. Date of the last survey _____
   e. Follow-up procedures _____
   f. How often will survey be updated? _____

B. POTW(s) Description/History

   a. Flows _____
   b. Plant processes _____
   c. Inhibition/Pass-through/Sludge contamination _____
   d. Sludge disposal practices _____
   e. IU flow / % of total plant flow _____

C. Description of how the POTW will control contributions to the treatment plant [403.8(f)(1)(i)] _____

D. Procedures for requiring compliance with pretreatment standards and requirements by the industrial users (IU) [403.8(f)(1)(ii)] _____

E. Permits [403.8(f)(1)(iii)(A-E)]

   a. Duration
   b. Non-transferability
   c. Effluent limits (categorical pretreatment standards, local limits, and State and local law
   d. Self-monitoring, sampling, reporting, notification and recordkeeping requirements including an identification of the pollutants to be monitored, sampling location, sampling frequency, and sample type
   e. Statement of applicable civil and/or criminal penalties for violations _____

F. Procedures for developing compliance schedules to meet pretreatment standards [403.8(f)(1)(iv)] _____

Implementation procedures continued

14. Do all sampling and monitoring procedures conform to EPA requirements? (40 CFR 136) _____
15. Follow-up activities for noncompliance [403.12(g)(2)]
    a. Notification within 24 hours
    b. Repeat sampling and analysis
    c. Report results of reanalysis within 30 days of becoming aware of violation
    d. Requirements if POTW does monitoring [403.12(2)(i-ii)] _____
16. Chain of custody procedures (attach copy) _____
17. Public participation [403.8(f)(2)(vii)] includes annual publication in local newspaper. _____
18. Confidentiality procedures [403.14] _____

L. Definition of significant noncompliance [403.8(f)(2)(vii)(A-H)] _____

M. Funding [403.8(f)(3)]

1. Resources
    a. Where will the funding come from? _____
    b. Itemized estimate of pretreatment implementation costs and personnel _____
2. Personnel
    a. Qualifications _____
    b. Responsibilities _____
    c. Chain of command _____
3. Equipment
    a. Sampling equipment
    b. Analytical equipment POTW or Contract
    c. Safety equipment
    d. Vehicles _____

N. Enforcement Response Plan [403.8(f)(5)]

1. How will the POTW investigate instances of noncompliance? [403.8(f)(5)(i)] _____
2. Types of escalating enforcement response to all anticipated types of IU violations and the time periods within which responses will take place. [403.8(f)(5(ii)] _____
3. Identify responsible official by title [403.8(f)(5)(iii)] _____
4. Actions taken to enforce pretreatment standards and requirements [403.8(f)(5)(iv)] _____

LEGAL AUTHORITY CHECKLIST
(all 403 cites refer to 40 CFR)

Name of POTW:
Date:

General Provisions

Section of Ordinance

1. Purpose and Policy

Enable POTW to comply with all applicable State and Federal laws including the Clean Water Act (33 U.S.C. 1251 et.seq.) and the General Pretreatment Regulations (40 CFR 403)

2. Objectives

a. prevent interference with operation of POTW
b. prevent pass through of pollutants
c. ensure quality of sludge to allow its use and disposal in compliance with statutes and regulations
d. protect general public and POTW personnel
e. Improve opportunity to recycle and reclaim wastewater and sludge
f. Provide for equitable distribution of the cost of operation, maintenance and improvement of POTW
g. Enable POTW to comply with NPDES permit conditions, sludge use and disposal requirements and any other Federal or State Laws

3. Definitions

a. Act or "the act" [403.3(b)]
b. Approval Authority [403.3(c)]
c. Authorized Representative of the Industrial User. [403.12(l)]
d. Biochemical Oxygen Demand (BOD)
e. City (or individuals representing the City)
f. Composite Sample (403 Appendix E)
g. Control Authority [403.12(a)]
h. Environmental Protection Agency or EPA
i. Grab Sample (403 Appendix E)
j. Indirect Discharge or Discharge [403.3(g)]
k. Industrial User or user [403.3(h)]
l. Interference [403.3(i)]
m. Maximum allowable discharge limit
n. New Source [403.3(k)]
o. Noncontact cooling water
p. Pass Through [403.3(n)]
q. Person
r. pH
s. Pollutant
t. Pretreatment [403.3(q)]
u. Pretreatment Requirements [403.3(r)]
v. Pretreatment Standards or Standards (ie. prohibitive discharge standards, categorical pretreatment standards, and local limits) [403.3(j)]
w. Publicly Owned Treatment Works or POTW [403.3(o)]
x. Significant industrial user [403.3(t)]
y. Slug load [403.8(f)(2)(v)]
z. Standard Industrial Classification (SIC) code
aa. Storm water
bb. Suspended solids
cc. Wastewater

2. Wastewater discharge permit requirement
   All SIU's shall obtain one. [403.8(f)(1)(iii)] _____

3. Wastewater discharge permitting for
   existing connections
   new connections
   extra-jurisdictional industrial users _____

4. Wastewater discharge permit application contents _____

5. Application signatories and certification Statement _____

6. Wastewater discharge permit contents
   [403.8(f)(1)(iii)(A-E)] _____
   a. permit duration
   b. non-transferability
   c. effluent limits
   d. self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored, sampling location, sampling frequency, and sample type.
   e. statement of applicable civil and criminal penalties for violations

Reporting Requirements

1. Baseline Monitoring Reports [403.12(b)] _____
2. Authority to establish compliance schedules [403.12(b)(7)and (c)] & [403.8(f)(1)(iv)] _____
3. Compliance schedule progress report [403.12(c)] _____
4. Report on compliance with categorical pretreatment standard deadline [403.12(d)] _____
5. SIU Periodic compliance reports [403.12(e)] and 403.8(12)(h)] _____
6. Report due dates and requirement for sampling to be performed during reporting period. [403.12(g)(3) and 403.12(h)] _____
7. Inspection and sampling of IUs by POTW at least once per year. [403.8(f)(2)(v)] _____
8. Self-monitoring requirements for SIUs [403.12(g) and 403.12(h)] _____
9. Certification statements[403.6(a)(ii),403.12(b)(6)] _____
10. Report on changed conditions [403.12(j)] _____
11. Notice of potential problems [403.12(f)] _____
12. Notice of violation/repeat sampling and reporting [403.12(g)] _____
13. Analytical requirements - 40 CFR 136 [403.12(b)(5)(vi), 403.12(g)(4), 403.12(h)] _____
14. Sample collection (i.e. grab,or composite, chain-of-custody, preservation, holding time, etc.) _____
16. Record Keeping [403.12(o)] _____

ENFORCEMENT RESPONSE PLAN

General Provisions	Section of Ordinance/ Program
1. Does the plan describe <u>specifically</u> how the POTW will investigate all instances of industrial user noncompliance?	
2. Does the plan address the criteria for scheduling sampling and inspection visits of industrial users?	
A. Do the criteria distinguish between routine and non-routine inspections and sampling visits?	
B. Are inspection schedules protected from discovery under local or state Freedom of Information provisions?	
3. Does the plan contain examples of industrial user inspection forms, chain of custody forms, sample analysis and reporting forms, etc. to ensure that evidence collected will be suitable for use in administrative or judicial enforcement actions?	
4. Does the plan describe the procedures which are or will be employed to ensure timely receipt and review of routine self-monitoring reports, noncompliance reports, progress reports, etc., which may be required of the industrial users?	
A. Does it identify the specific individuals or positions responsible for insuring that reports are submitted in a timely manner?	
B. Does it identify the specific individuals or positions responsible for review and evaluation of all submitted reports?	

ENFORCEMENT RESPONSE PLAN CHECKLIST

CONTROL AUTHORITY (CA) NAME:			
NPDES PERMIT NUMBER:			
REVIEWER:			
DATE REVIEWED:			
PLAN DEEMED APPROVABLE:		YES	NO

ENFORCEMENT RESPONSE PLAN CHECKLIST (Continued)

B. CA Sampling Activities	YES	NO	N/A
1. Sampling used as a means of identifying IU noncompliance			
2. Sampling used as a means of following up on IU noncompliance			
3. Identification of Responsible Personnel			
a. Preparing a sample plan			
b. Entering sample results into the "system"			
c. Recommending action			
4. Time frames for responding to IU noncompliance			
5. Sampling Procedures			
a. Criteria for establishing sampling frequency			
b Discussion of sampling collection procedures			
c. Discussion of chain of custody procedures			
d. Discussion of sample analysis procedures			
e. Evaluation of inspection results			

If the response to any of the above items is NO, discuss below:

C. Data Management	YES	NO	N/A
1. Procedures for updating IU inventory/information			
a. Responsible personnel identified			
b. Procedures			
c. Frequency			
2. Procedures for processing and tracking submission of all IU notices and reports			
a. Responsible personnel			
b. Procedures for tracking receipt of:			
i. BMRs/90 day compliance reports [403.12(b) & (d)]			
ii. Compliance schedule progress reports [403.12(c)]			
iii. Periodic reports on continued compliance [403.12(e) & (h)]			
iv. Notice of potential problems [403.12(f)]			
v. Notices of violation [403.12(g)(2)]			

II. ENFORCEMENT RESPONSE GUIDE

A. Anticipated Types of Noncompliance

	YES	NO	N/A
1. Discharge Violations			
Does the response guide distinguish between different types of violations?			
a. Discharge without a permit			
b. Isolated vs. recurrent			
c. Harm vs. no harm			
d. Slug load discharges			
e. Other (Describe _____)			
2. Reporting Violations			
Does the response guide distinguish between different types of violations?			
a. Improper signature or certification			
b. Late submittal			
c. Non-submittal of required reports			
d. Incomplete/deficient reports			
e. Falsification			
3. Other Non-Effluent Violations			
a. Improper sampling/analysis procedures			
b. Failure to install monitoring facilities/equipment			
c. Missed interim schedule event			
d. Missed final milestone event			
e. Dilution in lieu of treatment			
f. Failure to mitigate noncompliance			
g. Failure to properly operate or maintain treatment equipment			
h. Inadequate record keeping			
i. Failure to report results of additional sampling			
j. Other violations (Specify)			

Comments:

ENFORCEMENT RESPONSE PLAN CHECKLIST Continued)

D. Enforcement Response Procedures	YES	NO
1. a. Is a response required for all identified IU noncompliance?		
b. Are there stated criteria for escalating enforcement responses?		
c. Are there stated criteria for calculating penalty amounts?		
i. Is the minimum maximum penalty at least $1,000.00/day/violation		
ii. Are there procedures for determining "Economic Benefit"?		
iii. Do penalties recover, at a minimum, any economic benefit the IU may have realized?		

Discussion of Enforcement Response Procedures:

E. Response Time Frames		
1. Does the plan/guide specify maximum time frames for initial enforcement response?		
2. Does the plan/guide specify maximum time frames for escalation of enforcement?		

Discussion of Response Time Frames:

III. Identify (by Title) the Official(s) who must Approve Each Type of Response		
1. Is the specific responsible individual identified for each individual (or class of) enforcement response?		

Discuss:

IV. Discuss any Obstacles to Effective Enforcement Which you may have Identified.

Attachment 7: List of Categorical Industries with Reportable Pretreatment Standards

TITLE 40 - PROTECTION OF THE ENVIRONMENT
CHAPTER I - ENVIRONMENTAL PROTECTION AGENCY
SUBCHAPTER N - EFFLUENT GUIDELINES AND STANDARDS

The following categories do not contain reportable pretreatment standards

PART 405 - Dairy products processing point source category
PART 407 - Canned and preserved fruits and vegetables processing point source category
PART 408 - Canned and preserved seafood processing point source category
PART 409 - Sugar processing point source category
PART 410 - Textile mills point source category
PART 411 - Cement manufacturing point source category
PART 416 - [Reserved]
PART 422 - Phosphate manufacturing point source category
PART 424 - Ferroalloy manufacturing point source category
PART 426 - Glass manufacturing point source category
PART 427 - Asbestos manufacturing point source category
PART 432 - Meat products point source category
PART 434 - Coal mining point source category BPT, BAT, BCT limitations and new source performance standards
PART 436 - Mineral mining and processing point source category
PART 440 - Ore mining and dressing point source category
PART 454 - Gum and wood chemicals manufacturing point source category
PART 457 - Explosives manufacturing point source category
PART 459 - Photographic point source category
PART 460 - Hospital point source category
PART 463 - Plastics molding and forming point source category

The following categories contain at least one reportable pretreatment standard

PART 406 - Grain mills point source category
PART 412 - Feedlots point source category
PART 413 - Electroplating point source category
PART 414 - Organic chemicals, plastics, and synthetic fibers
PART 415 - Inorganic chemicals manufacturing point source category
PART 417 - Soap and detergent manufacturing point source category
PART 418 - Fertilizer manufacturing point source category
PART 419 - Petroleum refining point source category
PART 420 - Iron and steel manufacturing point source category
PART 421 - Nonferrous metals manufacturing point source category
PART 423 - Steam electric power generating point source category
PART 425 - Leather tanning and finishing point source category
PART 428 - Rubber manufacturing point source category
PART 429 - Timber products processing point source category
PART 430 - Pulp, paper, and paperboard point source category
PART 431 - The builders' paper and board mills point source category
PART 433 - Metal finishing point source category
PART 435 - Oil and gas extraction point source category
PART 439 - Pharmaceutical manufacturing point source category
PART 443 - Effluent limitations guidelines for existing sources and standards of performance and pretreatment standards for new sources for the paving and roofing materials (tars and asphalt) point source category
PART 446 - Paint formulating point source category
PART 447 - Ink formulating point source category
PART 455 - Pesticide chemicals
PART 458 - Carbon black manufacturing point source category
PART 461 - Battery manufacturing point source category
PART 464 - Metal molding and casting point source category
PART 465 - Coil coating point source category
PART 466 - Porcelain enameling point source category
PART 467 - Aluminum forming point source category
PART 468 - Copper forming point source category
PART 469 - Electrical and electronic components point source category
PART 471 - Nonferrous metals forming and metal powders point source category

United States Environmental Protection Agency
Engineering and Analysis Division (4303) Washington, DC 20460
Phone (202) 260-7120 Fax (202) 260-7185
September 1998

EPA

Industrial Wastewater Contacts in the Effluent Guidelines Program

Industry/Subject	Regulation	Person	Phone (Area Code 202)
Acid Mine Drainage		Bill Telliard Joe Vitalis	260-7134 260-7172
Airports - *see Deicing*			
Alternate Test Procedures (ATPs)	40 CFR 136	Maria Gomez-Taylor Khouane Ditthavong	260-1639 260-6115
Aluminum Forming	40 CFR 467	George Jett	260-7151
Analytical Methods Support (*Also see PBMS*)	40 CFR 136	Bill Telliard Maria Gomez-Taylor	260-7134 260-1639
Animal Feedlots Operations	40 CFR 412	Jan Goodwin Anna Kinney Ron Jordan	260-7152 260-7127 260-7115
Aquaculture - *see Fish Hatcheries*			
Asbestos Manufacturing	40 CFR 427	Ron Kirby	260-7168
Asphalt - *see Paving and Roofing Materials*			
Battery Manufacturing	40 CFR 461	George Jett	260-7151
Canmaking - *see Coil Coating*			
Carbon Black Manufacturing	40 CFR 458	George Jett	260-7151
Cattle Feedlots	40 CFR 412	Ron Jordan	260-7115
Cement Manufacturing	40 CFR 411	Ron Kirby	260-7168
Centralized Waste Treatment		Jan Matuszko Tim Connor	260-9126 260-3164

Chemicals - *see Gum & Wood, Inorganic, Organic, Pesticides*

Cluster Rule - *see Pulp, Paper, and Paperboard*

Coal Mining *(Coal Remining, Western Coal,etc.)*	40 CFR 434	Bill Telliard Joe Vitalis	260-7134 260-7172
Coil Coating *(includes Canmaking)*	40 CFR 465	George Jett	260-7151
Cooling Water Intake Structures [Clean Water Act - Section 316(b)]	40 CFR 401.14	Deborah Nagle	260-2656
Copper Forming	40 CFR 468	George Jett	260-7151
Dairy Products Processing	40 CFR 405	Don Anderson	260-7189
De-icing		Shari Zuskin	260-7130
Detection Issues *(Low Level Detection)*		Bill Telliard Henry Kahn	260-7134 260-5408

Development Documents (To Order) - *see Water Resource Center*

Docket - *see Water Docket*

Drinking Water Methods - *see Analytical Methods*		Bill Telliard Maria Gomez-Taylor	260-7134 260-1639
Drum Reconditioning		Woody Forsht	260-7190
Economic Analysis		Neil Patel	260-5405
Effluent Guidelines Plan [Clean Water Act - Section 304(m)]		Eric Strassler	260-7150
Effluent Guidelines Task Force		Beverly Randolph	260-5373
Electrical & Electronic Components	40 CFR 469	George Jett	260-7151
Electroplating	40 CFR 413	Steve Geil	260-9817
Environmental Monitoring Methods Index (EMMI)		Marion Thompson Maria Gomez-Taylor	260-7117 260-1639
Ethanol for Fuel		Bill Telliard	260-7134
Explosives Manufacturing	40 CFR 457	Joe Vitalis	260-7172

Feedlots - *see Animal Feedlots Operation*			
Ferroalloy Manufacturing	40 CFR 424	George Jett	260-7151
Fertilizer Manufacturing (Nitrogen & Phosphate)	40 CFR 418	Anna Kinney	260-7127
Fish Hatcheries		Don Anderson	260-7189
Foods - *see Dairy, Fruits & Vegetables, Grain Mills, Meat Products, Poultry, Seafood, Sugar*			
Foods and Beverages, Miscellaneous		Don Anderson	260-7189
Foundries - *see Metal Molding & Casting*			
Fruits & Vegetables Processing	40 CFR 407	Don Anderson	260-7189
Glass Manufacturing	40 CFR 426	Wendy Smith	260-7184
Gold Mining - *see Ore Mining & Dressing*		Ron Kirby	260-7168
Grain Mills	40 CFR 406	Don Anderson	260-7189
Gum & Wood Chemicals Manufacturing	40 CFR 454	Don Anderson	260-7189
Hospitals	40 CFR 460	Frank Hund	260-7182
Incinerators - *see Industrial Waste Combustors*			
Industrial Laundries		Marta Jordan	260-0817
Industrial Waste Combustors (formerly titled Incinerators)		Samantha Hopkins	260-7149
Ink Formulating	40 CFR 447	Don Anderson	260-7189
Inorganic Chemicals	40 CFR 415	Anna Kinney	260-7127
Internet Information		Bev Randolph	260-5373
Iron & Steel Manufacturing	40 CFR 420	George Jett Kevin Tingley	260-7151 260-9843
Landfill Leachate		Mike Ebner John Tinger	260-5397 260-4992
Leather Tanning & Finishing	40 CFR 425	Don Anderson	260-7189
Low BTU Gasification		Bill Telliard	260-7134

Marine Discharges from Vessels of the Armed Forces [CWA 312(n)] *(Sometimes called UNDS)*		Greg Stapleton Ron Jordan	260-0141 260-7115
Meat Products	40 CFR 432	Don Anderson	260-7189
Metal Finishing	40 CFR 433	Steve Geil	260-9817
Metal Molding & Casting (Foundries)	40 CFR 464	George Jett	260-7151
Metal Products and Machinery		Steve Geil Mike Ebner Tim Connor	260-9817 260-5397 260-3164
Mineral Mining & Processing	40 CFR 436	Ron Kirby	260-7168

Mining - *see Acid Mine Drainage, Coal Mining, Gold Mining, Mineral Mining & Processing, and Ore Mining & Dressing*

Nonferrous Metals Forming *(includes Metal Powders)*	40 CFR 471	George Jett	260-7151
Nonferrous Metals Manufacturing	40 CFR 421	George Jett	260-7151
Oil and Gas Extraction	40 CFR 435		
Offshore		Ron Jordan	260-7115
Coastal/Onshore		Chuck White	260-5411
Synthetic Drilling Fluids		Joe Daly	260-7186
Ore Mining & Dressing	40 CFR 440	Ron Kirby	260-7168
Organic Chemicals, Plastics & Synthetic Fibers	40 CFR 414	George Jett	260-7151
Paint Formulating	40 CFR 446	Don Anderson	260-7189
Paving and Roofing Materials (Tars and Asphalt)	40 CFR 443	Bill Telliard	260-7134
Performance-Based Measurement Systems (PBMS)	40 CFR 136	Khouane Ditthavong	260-6115
Pesticide Chemicals	40 CFR 455	Shari Zuskin Marv Rubin	260-7130 260-3028
Petroleum Refining	40 CFR 419	Ron Kirby	260-7168
pH Effluent Limitations under Continuous Monitoring	40 CFR 401.17	Henry Kahn	260-5408

Pharmaceutical Manufacturing	40 CFR 439	Frank Hund Marv Rubin	260-7182 260-3028
Phosphate Manufacturing	40 CFR 422	Anna Kinney	260-7127
Photographic Processing	40 CFR 459	Joe Daly	260-7186
Placer Mining - *see Ore Mining & Dressing*			
Plastics Molding & Forming	40 CFR 463	Woody Forsht	260-7190
Pollutants - Lists, Types, References		Bill Telliard	260-7134
Conventional-CWA Sec. 304(a)(4)	40 CFR 401.16	Maria Gomez-Taylor	260-1639
Toxic-CWA Section 307(a)(1)	40 CFR 401.15	Joe Vitalis	260-7172
Priority Pollutants (Appendix A)	40 CFR 423		
EAD Analytes			
Porcelain Enameling	40 CFR 466	George Jett	260-7151
Poultry Processing		Jan Goodwin	260-7152
Pretreatment *(or call Permits Division/Pretreatment Branch: 202-260-7539)*		Joe Vitalis	260-7172
Printing & Publishing		Don Anderson	260-7189
Publications - *see Water Resource Center*			
Pulp, Paper and Paperboard	40 CFR 430	Troy Swackhammer Don Anderson	260-7128 260-7189
Rubber Manufacturing	40 CFR 428	Joe Vitalis	260-7172
Seafood Processing	40 CFR 408	Don Anderson	260-7189
Secondary Treatment *(Call Permits Division @ 260-9545)*	40 CFR 133		
Shipbuilding		Steve Geil	260-9817
Soap & Detergent Manufacturing	40 CFR 417	Woody Forsht	260-7190
Solvent Recovery		Woody Forsht	260-7190
Statistical Analysis		Henry Kahn	260-5408
Steam Electric Power Generation	40 CFR 423	Joe Daly	260-7186

Sugar Processing	40 CFR 409	Don Anderson	260-7189
Superfund Sites - Discharges to POTWs (Guidance Document)		Woody Forsht	260-7190
Synthetic-based Drilling Fluids (SBF)	40 CFR 435	Joe Daly	260-7186
Textile Mills	40 CFR 410	Hugh Wise	260-7177
Timber Products Processing	40 CFR 429	Don Anderson	260-7189
Toxicity/ WET Testing		Bill Telliard Marion Thompson	260-7134 260-7117
Transportation Equipment Cleaning (Tank Cleaning)		John Tinger Jesse Pritts	260-4992 260-7191
UNDS -Uniform National Discharge Standards		Ron Jordan Greg Stapleton	260-7115 260-0141
Urban Stormwater Study		Eric Strassler Jesse Pritts	260-7150 260-7191
Used Oil Reclamation		Ron Kirby	260-7168
Waste Treatment - *see Centralized Waste Treatment, Industrial Waste Combustors, Landfill Leachate*			
Water Docket (East Tower Basement)		Colleen Campbell	260-3027
Water Intake Structures -CWA 316(b) *(see Cooling Water Intake Structures)*		Joe Daly	260- 7186
Water Resource Center (WRC) - Publications Automated Document Ordering (East Tower Basement)		Mary Conway	260-2814 260-7786
Water Supply		Don Anderson	260-7189
Web Sites - see Internet Information			
WET - *see Toxicity*			

Attachment 8: List of TPDES Pretreatment Program Coordinators and Multijurisdictional Partners

TPDES Pretreatment Program Coordinators List

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Brian	Socia	P.O. Box 60	Abilene	TX	79604-0060	(915) 548-2237	(915) 548-2017	
Don	Reynolds	P.O. Box 1971	Amarillo	TX	79105-1971	(806) 342-1556	(806) 342-1529	
Tony	Canales	P.O. Box 1088	Austin	TX	78767-1088	(512) 912-6060	(512) 912-6260	
Pamela L.	Kroupa	2123 Market	Baytown	TX	77571	(281) 420-5308	(281)420-5322	
Gloria	Broussard	P.O. Box 3827	Beaumont	TX	77704	(409) 866-0023		
Fabian	Jezjerski	P.O. Box 1059	Brenham	TX	77834-1059	(409) 836-7911	(409) 836-7605	
Maribel	Hinojosa	P.O. Box 3270	Brownsville	TX	78520	(956) 982-6387		
Jim	Macke	P.O. Box 1389	Brownwood	TX	76804	(915) 643-0570	(915) 646-0938	
Gary	Kasner	P.O. Box 1000	Bryan	TX	77805	(409) 361-3697	(409) 361-3822	
Charles	Mears	P.O. Box 657	Cleburne	TX	76031	(817) 645-0957	(817) 645-0926	
Ron	Cornmesser	P.O. Box 3066	Conroe	TX	77305	(409) 760-4634		ron_cornmesser@air-water.com
Steve	Klepper	P.O. Box 9277	Corpus Christi	TX	78469-9277	(512) 857-1804	(512) 857-1889	
Larry R.	Murray	200 N. 12th Street	Corsicana	TX	75110	(903) 654-4888	(903)654-4892	

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Cynthia	Belvin	6500 W. Singleton Blvd.	Dallas	TX	75212	(972) 263-2251	(972) 264-1382	
Alan	Aulenbach	500 S. Ervay, Ste 600 B	Dallas	TX	75201	(214) 670-4623	(214) 670-3879	aaulen@dww.ci.dallas.tx.us
Jimmy	Moon	P.O. Box 347	Denison	TX	75020	(903) 464-4488	(903) 464-4499	
Jimmy	Coulter	1100 Mayhill Road	Denton	TX	76201	(940) 383-7533		
Cindy	Edgar	P.O. Box 511	El Paso	TX	79925	(915) 594-5595	(915) 594-5699	
Curtis	Looman	P.O. Box 220	Ennis	TX	75120	(972) 875-3741	(972) 875-9086	
Sebastian	Fichera	920 Fourier	Fort Worth	TX	76102-3456	(817) 871-8305	(817) 871-8566	sfiche1@ci.fort-worth.tx.us
Rudy G.	Paclik	Drawer J	Gainesville	TX	76240	(940) 668-4544		
Dennis	Zajack	P.O. Box 779	Galveston	TX	77550	(409) 744-6367		
Kay A.	Bullard	P.O. Box 1049	Greenville	TX	75403-1049	(903) 457-2991	(903) 457-2989	
Sergio	Zamarron	P.O. Box 531888	Harlingen	TX	78553	(210) 430-8166	(210) 430-8511	
W. E.	Scalero	910 Bay Area Blvd.	Houston	TX	77058-2064	(281) 488-4115	(281) 488-3331	"wscalero@gcwda.com"
Bob	Hunt	7101 Renwick Street	Houston	TX	77081	(713) 295-5517	(713) 295-5506	

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Debra	Daugette	1212 Avenue M	Huntsville	TX	77340	(409) 295-5957		
David	Fain	P.O. Box 1390	Jacksonville	TX	75766	(903) 586-3510	(903) 586-4609	
Karen	Emadiazer	P.O. Box 299002	Lewisville	TX	75029-9002	(972) 219-3546	(972) 219-3508	
Kathy	Woodrow	P.O. Box 1952	Longview	TX	75606	(903) 758-2083		
Mary Hinkley	Gonzales	P.O. Box 2000	Lubbock	TX	79457	(806) 767-3229	(806) 765-9606	lubbock.waterrec.mgonzales@mail.ci.lubbock.tx.us
Debra	Cassidy	P.O. Drawer 190	Lufkin	TX	75902-0190	(409) 633-0288	(409) 634-7017	
Jerry	Cothron	P.O. Box 698	Marshall	TX	75670	(903) 935-4485		
Judy	Philips	P.O. Box 220	McAllen	TX	78505	(956) 972-7150	(956) 972-7155	utility@utility.ci.mcallen.tx.us
Maria	Cortes-Aocna	P.O. Box 339	Mineral Wells	TX	76068	(940) 325-5027	(940) 325-1319	
Henry	Simon	P.O. Box 648	Nacogdoches	TX	75961	(409)564-5046	(409)560-5137	
Mark	Dingeldein	P.O. Box 310289	New Braunfels	TX	78131-0289	(830)629-8474		
Greg	White	P.O Box 4398	Odessa	TX	79760	(915) 335-4625	(915) 335-4698	
Bob	Follett	P.O. Box 1970	Palestine	TX	75802	(903) 731-8494		

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Rodney	Brashier	P.O. Box 9037	Paris	TX	75460	(903) 784-2464		
Charles	Shajari	P.O. Box 1089	Port Arthur	TX	77641-1089	(409) 983-8227		
Robert	Martinez	517 Mission Road	San Antonio	TX	78210	(210) 704-1103	(210) 704-1146	rmtz@saws.org
Frances	Plocek	630 East Hopkins	San Marcos	TX	78666	(512) 393-8005	(512) 392-2625	fplocek@centuryinter.net
Beth	Brown	100 S. Rusk	Sherman	TX	75090	(903) 892-7256		
Tommy	Savell	P. O. Box 238	South Houston	TX	77587	(713) 947-7700	(713) 947-8958	tesavell@aol.com
Lynne	Burkhalter	2331 South Main St.	Stafford	TX	77477	(281)-499-2041	(281) 499-4223	
Johnny L.	Davis	P.O. Box 364	Stephenville	TX	76401	(254) 965-3668	(254) 965-0752	jdavis@omi.ms.ch2m.com
Dave	Reed	125 S. Davis Street	Sulphur Springs	TX	75482	(903) 885-7541	(903) 439-2092	csulphur@koyote.com
Ken	Zachary	750 Duck Creek Way	Sunnyvale	TX	75182	(972) 203-4325		
Jerry	Kean	2 North Main	Temple	TX	76503	(254) 770-5621		
Lisa	White	P.O. Box 2008	Texarkana	TX	75504	(903) 798-3870		
Monty	Shank	P.O. Box 2039	Tyler	TX	75710	(903) 531-1239	(903) 531-1259	

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
John C.	Smith	P.O. Box 2085	Victoria	TX	77902-2085	(512) 578-2878	(512) 578-9039	jsmith@tisd.net
Gilbert P.	Gregory	P.O. Box 7555	Waco	TX	76714-7555	(254) 776-1441	(817) 772-5780	gilbertg@brazos.org
David	Bailey	401 S. Rogers	Waxahachie	TX	75165	(972) 937-2624	(972) 937-5518	
Barbara	Brady Kerr	P.O. Box 255	Weatherford	TX	76086	(817) 598-4275	(817) 598-4140	"w000719@airmail.net"
Gerald	Gross	P. O. Box 1431	Wichita Falls	TX	76307	(940) 761-7873	(940) 761-8877	
John	Montgomery	P.O. Box 2408	Wylie	TX	75098	(972) 442-5405	(972) 442-5405	"jmontgo747@aol.com"

TPDES Pretreatment Program Multijurisdictional Partners

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Neil	Gayden	P.O. Box 144	Addison	TX	75001	(972) 450-2821	(972) 931-6643	
Keith	Thompson	P.O. Box 144	Addison	TX	75001	(972) 450-2873	(972) 450-2837	
Patrick	Akin	P.O. Box 231	Arlington	TX	76004	(817) 459-5902	(817) 459-5909	
Dan	Washington	P.O Box 800040	Balch Springs	TX	75180-0040	(972) 286-1666	(972) 286-7809	
Richard	Mills	1813 Reliance Pkwy	Bedford	TX	76021	(817) 952-2136	(817) 952-2240	
Jim	Boecher	P.O. Box 120	Belton	TX	76513			
Mitchell	Rivers	121 Mercedes	Benbrook	TX	76121	249-1250	249-6965	
Bill	Davison	141 W. Renfro St.	Burleson	TX	76028	295-1113	447-3928	
Ta	Soriaga	P.O.110535	Carrollton	TX	75011-0535	(972) 466-3175	(972) 466-3175	
Perry	Harts	P.O. Box 96	Cedar Hill	TX	75104	(972) 291-5126	(972) 291-5107	
Kelley	Howell	P.O. Box 185	Colleyville	TX	76034	(817) 540-0609	(972) 354-0469	
Perri	Kittles	500 Southwestern Blvd.	Coppell	TX	75019	(972) 304-3500	(972) 304-3514	
Gene	Mason	P. O. Drawer 747	Crowley	TX	76036	297-9771	297-6178	

TPDES Pretreatment Program Multijurisdictional Partners

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Cynthia	Belvin	6500 W Singleton Blvd.	Dallas	TX	75212	263-2251	264-1382	
Alan	Aulenbach	500 S. Ervay, Ste 600 B	Dallas	TX	75201	(214) 670-4623	(214) 670-3879	aaulen@dww.ci.dallas.tx.us
Kerry	Shoemake	4125 West Clarendon	Dallas	TX	75211	(214) 337-2678	(214) 330-5483	
Gene R.	Smallwood	P.O. Box 8005	Dallas	TX	75205	(214) 363-1644	(214) 987-5429	
James	Fisher	4700 Drexel Drive	Dallas	TX	75205	(214) 521-4161	(214) 559-9335	
Rick	Reeter	P.O. Box 619428	Dallas-Ft. Worth Airport	TX	75261-9428	(214) 574-9910	(214) 574-5509	
Harlyn	Farrell	620 N. Westmoreland	DeSoto	TX	75115	(972) 230-5712	(972) 230-5475	
Joel	Dougherty	P.O. Box 380280	Duncanville	TX	75138-0280	(972) 780-4937	(972) 780-4949	
Bill	Wilborn	P.O. Box 380280	Duncanville	TX	75138-0280	(972) 780-5066	(972) 780-4949	
Paul	Wrenzenski	201 North Ector Dr.	Euless	TX	76039-3595	(817) 685-1588	(817) 685-1416	
Jim	Craig	212 N. Race St.	Everman	TX	76140	293-0525	551-7549	
Alvin	Black R.S.	P.O. Box 819010	Farmers Branch	TX	75381-9010	(972) 919-2539	(972) 241-6305	

TPDES Pretreatment Program Multijurisdictional Partners

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Alvin	Black R.S.	P.O. Box 819010	Farmers Branch	TX	75381-9010	(972) 919-2539	(972) 241-6305	
Charlie	James	100 Town Plaza	Ferris	TX	75125	(972) 842-5761	(972) 544-8259	
Michael	Duehring	3415 Horton Rd.	Forest Hill	TX	76119	534-3591	534-4207	
Sebastian	Fichera	920 Fourier	Fort Worth	TX	76102-3456	(817) 871-8305	(817) 871-8566	sfiche1@ci.fort-worth.tx.us
Don	Newton	1601 Bell Avenue	Fort Worth	TX	76131	232-0451	232-4682	
Gary	Hartwell, P.E.	P.O. Drawer 1100	Frisco	TX	75034	(972) 335-5520		
Monte	Taylor	6720 Telephone Rd.	Ft. Worth	TX	76135	237-1211	237-1333	
H. Carter	Burdette	5824 Merrymount Rd.	Ft. Worth	TX	76107	737-3127	737-3130	
John	Cherry	3201 Diana Dr.	Ft. Worth	TX	76118	595-6626	595-6644	
Ken	Staggs	4900 River Oaks Blvd.	Ft. Worth	TX	76114	626-5421	624-2154	
Nancy	Tsivis	311 Burton Hill Rd.	Ft. Worth	TX	76114	738-3673	738-0535	
Charles	Talbat	1605 Edgecliff Rd.	Ft. Worth	TX	76134	293-4313	293-8726	
Ken	Williams	P.O. Box 534045	Grand Prairie	TX	75053-4045	(972) 237-8055	(972) 262-4232	
Matt	Singleton	P.O. Box 95104	Grapevine	TX	76099	(817) 481-0417	(817) 424-0511	
Brad	Robinson	P. O. Box 14246	Haltom City	TX	76117	834-9036	831-7855	

TPDES Pretreatment Program Multijurisdictional Partners

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Ron	Owens	1505 Precinct Line Rd.	Hurst	TX	76054	788-7205	788-7214	
Lisa	Fowler	1505 Precinct Line Rd.	Hurst	TX	76054	(917) 788-7078	(817) 788-7097	
Earl	Kendrick		Hutchins	TX	75141	(972) 225-3380	(972) 225-5559	
Diane	Malas	P.O. Box 152283	Irving	TX	75015-2288	(972) 721-2283	(972) 721-2280	
Gerald	Cooksey	P.O. Box 770	Keller	TX	76248	(817) 431-1517	(817) 431-2051	
John	Laporte	P. O. Box 268	Kennedale	TX	76060	478-5418	561-4017	
Steve	Sacharko	P.O. Box 940	Lancaster	TX	75146-940	(972) 227-6075	(972) 227-7220	
Robert	Stephens	1305 E. Broad Street	Mansfield	TX	76063	(817) 477-2248	(817) 473-2462	
Peter	Nylec	P. O Box 517	McKinney	TX	75069	(972) 542-2675		
Mike	Screws	P.O. Box 850137	Mesquite	TX	75185-0137	(972) 216-6941	(972) 329-8593	
Edward	Sims	P.O Box 850137	Mesquite	TX	75185-0137	(972) 216-6941	(972) 329-8593	
Kevin	Miller	P.O. Box 820609	North Richland Hills	TX	76180	(817) 581-5521	(817) 656-7538	

TPDES Pretreatment Program Multijurisdictional Partners

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Lee	Barry	P. O. Drawer 18609	North Richland Hills	TX	76180	581-5671	656-7503	
Ron	Gibson	P. O. Box 13210	Pantego	TX	76013	274-2115	265-1375	
Steve	Berry	P. O Box 860358	Plano	TX	75086-0358			
Bob	Galvan	P.O. Box 830309	Richardson	TX	75083	(972) 238-4172		
Tim	McKinley, R.S.	P.O. Box 839309	Richardson	TX	75083-0309	(972) 238-4167	(972) 644-2618	
Tracey	Harring	221 East Main Street	Round Rock	TX	78664	(512) 218-5559	(512) 218-5563	
Randy	Newsome	P. O. Box 79070	Saginaw	TX	76179	232-2641	232-4644	
Robert	Whitehead	667 N. Carroll	Southlake	TX	76092	(817) 481-5581	(817) 488-6796	
Howard	Christian	P.O. Box 110	Sugar Land	TX	77487	(281) 275-2456	(281) 275-2465	
Kent	Kaughman	P.O. Box 1737	Temple	TX	76503-1737	(254) 742-0642	(254) 742-0843	
John	Rickman	P.O. Box 310	Terrell	TX	75160	(972) 551-6631	(972) 551-6682	
Lynn	Short	P.O. Box 1758	Victoria	TX	77902-1758	(512) 572-2749	(512) 575-0977	lshort@victoriatx.org
Lanelle	Belicek	P. O. Box 1758	Victoria	TX	77902-1758	(512) 572-2749	(512) 575-0997	"lbelicek@victoriatx.org"

TPDES Pretreatment Program Multijurisdictional Partners

FIRST	LAST	MAIL	CITY	STATE	ZIP	PHONE	FAX	EMAIL
Joe	Burgess	P.O. Box 2570	Waco	TX	76702-2570	(254) 750-8004	(254) 750-8074	
Jerry	Senkyr	214 Meadow Park Dr.	White Settlement	TX	76108	367-3762	367-2534	
John	Mosley	128 N. Dallas Ave. -	Wilmer	TX	75172	(972) 441-6373	(972) 441-6224	
Mike	Phillips	2000 HWY 78 North	Wylie	TX	75098			

Attachment 9: EPA's Executive Summary of Industrial User Significant Noncompliance Determination

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 23 1992

OFFICE OF
WATER

All Approved POTW Pretreatment Program Coordinators:

Enclosed for your information is the executive summary of an EPA evaluation of compliance by significant industrial users with pretreatment standards and requirements. The report, entitled "Statistical Assessment of National Significant Industrial User Noncompliance" (June 1992), presents data which suggests that there is a significant problem with industrial users' compliance with pretreatment standards and requirements.

EPA undertook this study to independently determine, with known statistical confidence, the level of significant noncompliance (SNC) by significant industrial users of publicly owned treatment works (POTWs). The study evaluated noncompliance at a scientifically selected sample of 640 industrial facilities discharging into 60 POTWs across the country. The central purpose of the study was to establish baseline data using a definition of SNC which EPA adopted on July 24, 1990. The study results will be used to measure future trends in industrial compliance.

The most significant result described in the report is that 54 percent of the 30,000 significant industries nationwide would have been in SNC with effluent limits or reporting requirements, or both, using the Federal definition promulgated in July 1990.

The study looked at industrial performance for the 1990 calendar year. The values indicate the percentage of industries which would have been in SNC some time during the 1990 calendar year. The study did not attempt to identify whether or when industries returned to compliance during the year, either voluntarily or through enforcement by the POTWs.

Significant noncompliance was the focus of this study because it is one area of implementation for which EPA had little consistent, verifiable data. There are, of course, other programmatic measures of POTW implementation, including: percent of permits issued, number of inspections or sampling events performed, number of enforcement actions taken, interference or pass through of the treatment plant and improvements in sludge quality. All of these elements must be examined in concert to determine the overall health of the pretreatment program.

While other data indicate that significant progress has been made in pretreatment over the last decade, the high level of SNC identified in this study must not be allowed to continue in the future. Clearly EPA, State and local officials need to improve efforts to ensure that industrial facilities are aware of pretreatment requirements and that they take necessary steps to consistently comply with all pretreatment standards and requirements.

To address the problems identified in this study, POTWs need to ensure that they are correctly identifying SIUs which fall into SNC and that prompt action is taken to ensure that SIUs take appropriate corrective action. We have enclosed a copy of the SNC methodology (September 9, 1991) which provides guidance on the proper way to apply the July 1990 definition of significant noncompliance. In addition to increased enforcement, POTWs also need to expand outreach activities to ensure that industries are aware of all applicable Federal, State and local pretreatment requirements.

EPA plans to review its oversight to ensure that appropriate emphasis is placed on industrial compliance in the future. At the same time, in our POTW training program we will increase emphasis on SIU SNC in order to assure consistent application of these criteria. We will also continue to aggressively enforce against SIUs and POTWs which fail to meet their pretreatment obligations under the law.

Finally, EPA intends to conduct a broader study of industrial compliance next fiscal year and will involve outside parties in the evaluation. We will also repeat the statistical study from time to time to ensure that our conventional data on industrial compliance is accurate.

EPA, States and POTWs must work together in resolving the underlying conditions which give rise to noncompliance. To that end, if you need further assistance in addressing problems with industrial compliance please contact your State or Regional Pretreatment Coordinator. For more information on the SNC study please call Greg Marshall of my staff at (202) 260-7745.

Sincerely yours,

Michael B. Cook
Director
Office of Wastewater Enforcement
and Compliance

Enclosures

EXECUTIVE SUMMARY

BACKGROUND

The General Pretreatment Regulations [40 Code of Federal Regulations (CFR) Part 403] require Control Authorities [States/Territories or Publicly Owned Treatment Works (POTWs)] to develop, implement, and enforce comprehensive pretreatment programs to regulate industrial wastewater discharges into POTWs. Thirty-eight states have pretreatment programs. Five others have elected to operate state-run programs in lieu of requiring local programs.[1] In the absence of an approved state program, EPA assumes responsibility for running the pretreatment program. At the time of this study (1991), there were 1,484 U.S. Environmental Protection Agency (EPA) approved POTW pretreatment programs Nationwide and approximately 27,000 Significant Industrial Users (SIUs) discharging to these POTWs. Once approved, local POTW programs are overseen by the Approval Authority (EPA or approved State Agencies). Ultimate responsibility for this oversight rests with EPA's Office of Wastewater Enforcement and Compliance.

As part of its oversight program, EPA has established criteria, known as Reportable Noncompliance Criteria (RNC), to evaluate POTW pretreatment program implementation and enforcement. One element of these criteria, "enforcement effectiveness," considers the Significant Noncompliance (SNC) rate of SIUs. Section 403.8(f)(2)(vii) of the General Pretreatment Regulations defines SIU SNC (see also Appendix A). On September 9, 1991, EPA issued a memorandum clarifying procedures to calculate SIU SNC (see Appendix B).

To enable EPA to fulfill its oversight responsibilities, the Agency established a system, known as the Pretreatment Permits Enforcement Tracking System (PPETS), to track POTW compliance with their National Pollutant Discharge Elimination System (NPDES) permit and approved pretreatment program. Data for this system are primarily obtained from POTW performance reports and POTW interviews during audits and inspections conducted by State and Regional personnel.

EPA undertook this study to independently determine, with known statistical confidence, the level of SIU SNC with pretreatment standards, and self-monitoring and reporting requirements. Since both

[1]Known as 403.10(e) States: Vermont, Connecticut, Mississippi, Alabama, and Nebraska.

the definition and calculation of SNC are newly promulgated (and in fact, postdate the study period), this study serves as a baseline for identifying future SNC trends. Specifically, the results of this study cannot be compared with PPETs data for the same period since the application of SNC at any given POTW may have differed from the 1991 National methodology. EPA may repeat the study from time to time as a means of independently verifying future data on the level of SIU SNC reported by POTWs. Therefore, findings from this study on SNC rates are strictly baseline estimates that can be compared against future POTW estimates of SIU SNC only.

PURPOSE AND SCOPE OF THE STUDY

The purpose of the study was to establish an independent baseline against which to measure future SNC trends using the definition promulgated in July 1990. With that in mind, the study evaluated SNC that occurred in calendar year 1990, using the National SNC methodology distributed in September 1991. Study results should not be used to judge the accuracy of past POTW reporting of SIU SNC since past SNC determinations were not necessarily calculated using current Federal regulations or the recent EPA methodology. The scope of the study included a population of 60 POTWs from which 640 SIU files were randomly selected for evaluation. The POTWs selected represent all States except Alaska, Hawaii, and the State-run programs under 403.10(e).[2] The study-POTWs included small (1-19 SIUs), medium (20-75 SIUs) and large (>75 SIUs) programs. Approximately 50 percent of the SIUs evaluated in the study are subject to National Categorical Pretreatment Standards.

The study evaluated three aspects of the program during calendar year 1990: (1) the occurrence of SIU noncompliance with local control mechanism (i.e., permit) requirements; (2) the occurrence of SIU SNC with these same requirements; and (3) whether permits issued to SIUs which were effective during calendar year 1990 included all limits (Federal, State and local) and monitoring/reporting requirements required by regulation.[3] Industry compliance was evaluated against permit requirements rather than the Federal standards to be comparable with subsequent SNC determinations made by

[2]403.10(e) States: Vermont, Connecticut, Nebraska, Mississippi, and Alabama were not included in the study as these States are not reported in PPETS.

[3]In some instances where questions arose, reviewers used additional information (such as permit applications, sewer use ordinances, and meeting notes).

POTWs implementing the program (and future PPETS data). SNC determinations were based on EPA's regulatory definition promulgated on July 24, 1990, and the September 9, 1991, methodology. This study was limited to a review of information contained in SIU files.

Since this study employed the new regulatory definition and methodology of SNC, its results can not be compared with previously collected information. For example, since POTWs may or may not have been using the same criteria as in this study to evaluate SNC, SNC rates determined in this study and the SNC rates reported by POTWs will not match.

Additionally, no effort was made to determine whether SIUs returned to compliance during the evaluation period. Therefore, the report does not quantify the universe of SIUs currently violating pretreatment standards and requirements. Rather, it identifies the percent of SIUs which would have been in SNC with EPA's current definition of SNC at some point during calendar year 1990. Similarly, the study did not evaluate the enforcement response(s) taken by POTWs or State or Federal Agencies in response to SIU SNC. Finally, it should be noted that violation of a discharge standard by an SIU does not alone indicate that receiving waters are being impaired or degraded by that industrial user.

METHODOLOGY

Prior to beginning the study, EPA established, as a goal, the identification of the National level of SIU SNC with 95 percent confidence and a Standard Error (SE) of no more than ± 5 percent. To achieve this goal, five activities had to be undertaken:

1. Develop an appropriate statistical protocol for selecting the study-POTW and SIU populations. The protocol employed a probability-based, two-phase file selection scheme that first selected a specified number of POTW programs from the most current Agency list, and then selected files at random from each chosen POTW.

2. Develop a checklist to evaluate local permits and SIU compliance with those permits. These materials were field tested at 9 POTWs prior to the assessment and revised accordingly.

3. Implement full-scale file reviews on at least 600 SIUs at 60 study-POTWs between June and September 1991.

4. Incorporate stringent Quality Assurance/Quality Control (QA/QC) protocols, including:
   - A core group of trained inspectors to perform the file reviews

- Field quality assurance checks to ensure consistency of interpretation
- Cross-checks of the checklist information prior to data entry
- Double entry of all file review data to ensure accuracy in data entry operations.

5. Perform a statistical analysis of the results of the file reviews and evaluate the findings.

FINDINGS

The SE/Confidence Level results, SIU SNC findings, and permit evaluations are summarized below. See Chapter 2 and Appendices D, E, F, and G of the report for more details on the findings of the study.

Standard Error (SE)/Confidence Level

The desired SE and confidence level were not achieved because: (1) the prestudy estimates of SNC were much lower than the actual observations of the study; (2) the SNC rates from POTW to POTW, both within and among the geographic areas studied, were highly variable; and (3) PPETS estimates of SIUs at the study-POTWs proved inaccurate. Refer to Chapter 7 for a more complete discussion of why the goal of 95 percent confidence and a SE of no more than $\pm$ 5 percent was not achieved in the study.

The reader should note that the findings are presented first as the "most probable value" and second as the 90 percent confidence interval. The rates at the lower end of the range have an associated confidence level of 95 percent. For example, the finding that "35 percent of SIUs were in SNC with discharge standards," means that the most probable value is 35 percent and there is 95 percent confidence that the SNC rate with discharge standards is at least 24 percent.

SIU SNC

These 1990 SIU SNC levels are based on four 6-month evaluation periods. Specifically, the periods include the 6-month periods ending March 31, 1990; June 30, 1990; September 30, 1990; and December 31, 1990. Therefore, determination of SNC required a review of 15 months of SIU data (i.e., October 1, 1989, through December 31, 1990). The numbers presented indicate the percent of

SIUs identified in SNC at least once during the evaluation period. As such, these numbers are not indicative of the SNC rate at any given point of time during 1990.

- 35 percent of SIUs would have been in SNC (as currently defined by EPA) with discharge standards (categorical standards and local limits). There is 90 percent confidence the value falls between 24 percent and 46 percent.
- 36 percent of SIUs would have been in SNC (as currently defined by EPA) with pretreatment self-monitoring and reporting requirements. There is 90 percent confidence the value falls between 20 percent and 52 percent.
- 54 percent of SIUs would have been in SNC (as currently defined by EPA) with discharge standards and/or self-monitoring and reporting requirements. There is 90 percent confidence the value falls between 32 percent and 75 percent.
- The study reveals no statistically significant differences between categorical SIU and noncategorical SIU SNC rates for standards, monitoring/reporting, or overall standards/monitoring and reporting.

SIU Permit Evaluation

This summary of the SIU permit evaluation is based on a review of SIU permits and applicable data for the 12-month period starting January 1, 1990, and ending December 31, 1990. The findings presented below should not be construed to indicate POTW compliance status since this study was not designed for that purpose.

POTWs were legally responsible for implementation of local limits and categorical standards at the time of the study. In contrast, some POTWs were not legally responsible for implementation of some of the monitoring and reporting conditions since the General Pretreatment Regulations were revised in 1988 and 1990 to include additional SIU monitoring and reporting requirements. A POTW is not required to implement new regulatory requirements until its NPDES permit has been modified to include those requirements and it is likely that NPDES permits for some of the study-POTWs had not been revised prior to the study to require implementation of these new conditions.[4]

- 13 percent of SIU permits did not include all applicable local discharge standards. There is 90 percent confidence the value falls between 4 percent and 22 percent.

[4]NPDES permits are usually reissued/revised on a five-year cycle.

- 34 percent of SIU permits did not include all applicable categorical discharge standards. There is 90 percent confidence the value falls between 14 percent and 53 percent.

- Of those POTWs using self-monitoring, 64 percent of SIU permits did not include all applicable Federal self-monitoring requirements, including some for which the POTW may not have been legally responsible. There is 90 percent confidence the value falls between 41 percent and 87 percent.

- 56 percent of SIU permits did not include all applicable Federal reporting requirements, including some for which the POTW may not have been legally responsible. There is 90 percent confidence the value falls between 39 percent and 74 percent.

- 79 percent of SIU permits did not include at least one of the applicable Federal requirements above (i.e., local limits, categorical discharge standards, and Federal self-monitoring requirements and reporting requirements for which the POTW may not have been legally responsible). There is 90 percent confidence the value falls between 56 percent and 99 percent.

- The study reveals no apparent significant differences in the SIU SNC level based on the completeness or accuracy of the local permit.

The United States Environmental Protection Agency

Office of Wastewater Enforcement and Compliance

THE NATIONAL PRETREATMENT PROGRAM

FACTS ABOUT THE SIGNIFICANT NONCOMPLIANCE STUDY

Background on the National Pretreatment Program

EPA estimates that there are more than 30,000 industrial facilities discharging significant amounts of wastewater to Publicly Owned Treatment Works (POTWs). The National Pretreatment Program is designed to prevent industries from discharging toxic pollutants capable of harming the environment, the municipal wastewater treatment plant, or contaminating sludge generated by these treatment plants. Under the program, the local municipality usually has the primary responsibility to control the industrial wastes entering its sewer system. EPA and States are responsible for overseeing these local POTW programs to ensure that the industrial wastewater is being appropriately controlled.

The Purpose of the Study:

- *Statistically determine the National significant noncompliance (SNC) rate for significant industrial users (SIUs) regulated by the National Pretreatment Program*
- *Establish a baseline to measure future noncompliance trends of SIUs*

Scope of the Study:

- *Study conducted by Science Applications International Corp., an EPA contractor with extensive experience in the Pretreatment Program*
- *Time period studied was SNC which occurred in calendar year 1990*

- *640 industrial files reviewed at 60 POTWs*
  - *Stratified probability sampling scheme used to select POTWs*
    - *POTW selection factors were (1) number of SIUs and (2) geographic location*
  - *Equal number of categorical industries and noncategorical industries were randomly selected from the 60 POTWs*
- *1990 data were evaluated against 1991 definition of Significant Noncompliance to establish a baseline for future trend analysis*

Study Results:

The results shown here provide both the statistically "most probable value" as well as the 90% confidence interval around that value. The reader should note that one can have 95% confidence that the true value is greater than the lowest (or smaller than the highest) bound of the confidence interval. (For example, for the first value below, one can have 95% confidence that at least 24% of SIUs were in SNC with discharge standards.)

- *35% of SIUs would have been in SNC (as currently defined by EPA) with discharge standards (categorical standards and local limits). There is 90% confidence that the value falls between 24% and 46%.*
- *36% of SIUs would have been in SNC (as currently defined by EPA) with pretreatment self-monitoring and reporting requirements. There is 90% confidence that the value falls between 20% and 52%.*
- *54% of SIUs would have been in SNC (as currently defined by EPA) with discharge standards and/or self-monitoring and reporting requirements. There is 90% confidence that the value falls between 32% and 75%.*

The report also describes results from ancillary data accrued in the course of the SIU SNC evaluation. These results include the level of simple noncompliance and an evaluation of SIU permit contents.

Study Does Not Evaluate:

- *The current (1992) rate of SNC among SIUs*
- *Whether SIUs voluntarily returned to compliance during the year*
- *The accuracy of past reports submitted by POTWs*
- *The site-specific reasons for each SIU's SNC*
- *Individual SNC rates for POTWs, States or Regions*

Methodology of the Study:

- *In order to ensure accuracy, the study was conducted by 7 well-trained inspectors, familiar with the National Pretreatment Program*
- *The study followed a uniform checklist developed by EPA, and field tested on 50 SIU files at 9 POTWs prior to commencing the study*
- *Stringent quality control measures were observed by the field inspectors when collecting information, and by the statisticians during analysis of the data*

EPA Responses to the Study:

- *Emphasize the use of enforcement at the EPA, State and POTW level to secure SIU compliance and promote deterrence*
- *Assist POTW implementation by sponsoring training on identifying SNC and responding in a timely and appropriate manner*
- *Revise EPA's existing compliance oversight practices to emphasize SNC in the future*
- *Conduct a follow-up study to measure effectiveness of local enforcement and SIUs which voluntarily return to compliance*
- *Repeat SIU SNC Study in subsequent years to measure progress*

Significant Noncompliance Criteria

Industrial facilities are subject to enforcement for any violation of the pretreatment standards and requirements. However, EPA has promulgated the following criteria against which to gauge industrial performance and prioritize the use of enforcement resources at the Federal, State and Local levels. These criteria are referred to as "significant noncompliance" (SNC) criteria and are set out in Federal regulations at 40 CFR 403.8(f)(2)(vii):

A. Chronic violations of wastewater discharge limitations (66 percent or more of all measurements taken in a 6 month period exceed the daily maximum or the long-term average limit for the same pollutant parameter).

B. Technical Review Criteria (TRC) violation (33 percent or more of all measurements taken in a 6 month period exceed 1.2 times the limit for toxics or 1.4 times the limit for BOD, TSS, and O&G).

C. Any other violation of an effluent limit that the Control Authority determines has caused, either alone or in combination with other discharges, pass through or interference.

D. Any discharge that causes endangerment to human health, welfare, or the environment, or causes the POTW to exercise its emergency authority to halt or prevent such discharge.

E. Failure to meet a compliance schedule milestone date or enforcement order within 90 days after the scheduled date for starting construction, completing construction, or attaining final compliance.

F. Reports that are more than 30 days late (e.g., Baseline Monitoring Reports, 90-day reports, periodic reports, and compliance schedule milestone reports).

G. Failure to accurately report noncompliance.

H. Any violation determined to adversely affect the operation or implementation of the pretreatment program.

Significant Industrial User Criteria

Industrial users of Publicly Owned Treatment Works (POTWs) are regulated under the National Pretreatment Program. In particular, the pretreatment program targets some 30,000 industrial users which have the greatest potential to damage treatment works or cause environmental harm. The following criteria (set out in Federal regulations at 40 CFR 403.4(t)) are used to determine and define such "Significant Industrial Users (SIUs)":

i) any categorical industry

ii) any industry discharging an average of 25,000 gpd or more

iii) any industry discharging 5% or more of average dry weather hydraulic or organic capacity of treatment plant

iv) any other so designated by POTW

SIUs are regulated by National Pretreatment Standards as set out in Federal regulations at 40 CFR 403.5 and 403.6:

A. General prohibition against pass through or interference and

B. Eight specific prohibitions and

C. • categorical standards (~32%)
and/or
• POTW local limits (~68%)

Technical Contacts: Greg Marshall -- (202) 260-7745
Mark Charles -- (202) 260-8319

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 9 1991

OFFICE OF WATER

MEMORANDUM

SUBJECT: Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users

FROM: Michael B. Cook, Director
Office of Wastewater Enforcement and Compliance

TO: Water Management Division Directors, Regions I-X
Approved Pretreatment State Coordinators

Background:

On July 24, 1990, the Agency replaced the definition of "significant violation" with the definition of "significant noncompliance" (SNC) [see 40 CFR 403.8(f)(2)(vii) and 55 Fed. Reg. 30082]. This change eliminated the inconsistencies which arose in applying the significant violation criteria and established more parity in tracking violations committed by industrial users. The definition of SNC parallels the Pretreatment Compliance Monitoring and Enforcement Guidance (PCME) definition of SNC published in 1986.

This memorandum responds to several questions from States, publicly owned treatment works (POTWs), and industry regarding the application of the SNC definition. One frequently asked question is whether the time frame for determining SNC for technical review criteria effluent violations is a static six month period (i.e., a fixed six month calendar interval) or a rolling six month time frame (i.e., the current day minus six months). POTWs and industry have also inquired whether all data must be used to calculate SNC. The following discussion is provided to promote consistency in the application of this definition. Regions, States and POTWs should determine SNC in the manner prescribed below.

Pretreatment POTWs are required to notify the public of significant industrial users which meet the definition of SNC through publication in the newspaper. The POTW should also use the SNC criteria as the basis for reporting an industrial user's compliance status to the Approval Authority in its Pretreatment Performance Report. According to 40 CFR 403.12(i)(2), the POTW must report on the compliance status of its industrial user universe at the frequency specified by the State or EPA National Pollution Discharge Elimination System (NPDES) permit, but in no case less than once per year. Finally, the definition of SNC is used to determine whether a formal enforcement action against a user is warranted in accordance with the POTW's Enforcement Response Plan (ERP).

Applying the Definition: Use of the Six Month Time Frame:

There are seven criteria set forth in §403.8(f)(2)(vii). Two of these criteria concern violations evaluated over a six month time frame. The Agency intends for Control Authorities to evaluate these criteria on a rolling basis. The EPA's long established practice in the NPDES program is to evaluate SNC for direct dischargers each quarter using data from the previous six months. Similarly, Control Authorities should determine SNC for their universe of industrial users on the same rolling quarters basis using fixed quarters established by the Control Authority to correspond to its "pretreatment year" (e.g., March 31, June 30, September 30 and December 31).

At the end of each quarter, POTWs and States are to evaluate their industrial user's compliance status using the two criteria of the SNC definition which are evaluated on a six month time frame (i.e., the "A" and "B" criteria under the regulatory definition). Under this system, each industrial user is evaluated for SNC four times during the year, and the total evaluation period covers 15 months (i.e., beginning with the last quarter of the previous pretreatment year through the end of the current year). When the POTW is required to publish, it must list in the newspaper all industrial users which have been identified as SNC during the previous year (i.e., the SNC criteria were met during any of the previous four quarters).

If a facility has been determined to be in SNC based solely on violations which occurred in the first quarter of the 15 month evaluation period (i.e., the last quarter of the previous pretreatment year) and the facility has demonstrated consistent compliance in the subsequent four quarters, then the POTW is not required to republish the Industrial User (IU) in the newspaper if the IU was published in the previous year for the same violations.

Use of Industrial User and POTW Data in Determining SNC:

Several POTWs have inquired whether all data, including Control Authority sampling and industrial user self-monitoring, must be used in determining SNC. This question arises from the concern that an industrial user may choose to conduct its sampling efforts at times in which it knows that it is in compliance (e.g., during early morning start-up or during periods in which the industrial process is down). The concern is that use of these unrepresentative data will allow the industry to craft its compliance status such that it will never be in SNC.

The regulation defining SNC clearly requires that all measurements taken in the appropriate six month period must be used to determine a facility's SNC status. Therefore, any and all samples obtained through appropriate sampling techniques which have been analyzed in accordance with the procedures established in 40 CFR Part 136 must be used to determine whether the facility is in SNC.

The General Pretreatment Regulations further state that periodic compliance reports must be based on data obtained through appropriate sampling and analysis, and the data must be representative of conditions occurring during the reporting period [403.8(f)(1)(iv)

and 403.12(g)(3)]. The Control Authority must require that frequency and scope of industrial user self-monitoring necessary to assess and assure compliance by industrial users with applicable pretreatment standards and requirements.

The nature and scope of the sampling undertaken by an industrial user is under the control of the Control Authority through the issuance of an industrial user permit. These permits should specify the sampling locations and sample collection method necessary to ensure that representative samples are obtained for all regulated waste streams. By requiring industrial users to obtain representative samples, the Control Authority will ensure that industrial users do not evade noncompliance through selective sampling of their industrial processes.

Conclusion:

The Control Authority is required to screen all compliance data, whether generated through industrial user self-monitoring or by the Control Authority, to identify any violations of pretreatment requirements. Whenever there is a violation, the Control Authority must take appropriate enforcement action, as defined in its ERP. After this initial enforcement response, the Control Authority should closely track the industrial user's progress toward compliance by increasing the frequency of user self-monitoring, increasing the POTW's monitoring, or both.

When follow-up activity indicates that the violations persist or that satisfactory progress toward compliance is not being made, the Control Authority is required to escalate its enforcement response in accordance with the procedures established in its ERP. **At a minimum EPA expects POTWs to address SNC with an enforceable order that requires a return to compliance by a specific deadline.** When this enforceable order involves a compliance schedule, the industrial user remains in SNC during the period of the schedule (unless the facility returns to compliance prior to the end of the schedule). For example, if the duration of the schedule is two years, the facility should be published in both years. Of course, the POTW should explain in its publication that the violations have been addressed with a formal enforcement action (similar to a "resolved pending" listing on the Quarterly Noncompliance Report).

The definition of SNC provides a benchmark against which the compliance status of an industrial user and the enforcement activities of POTWs can be measured. The concept of significant noncompliance plays a pivotal role in the implementation and enforcement of the National Pretreatment Program. In order for the definition to succeed, it is critical that each Control Authority apply it on a consistent basis. If you have any further questions on this issue, please feel free to call me at (202) 260-5850. The staff person familiar with these issues is Lee Okster at (202) 260-8329.

cc: Cynthia Dougherty
Regional Water Compliance Branch Chiefs
Regional Pretreatment Coordinators
Lead Regional Pretreatment Attorneys

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 17 1992

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Determining Industrial User Significant Noncompliance - One Page Summary

FROM: Mark D. Charles, Chief Mark D. Charles
RCRA and Pretreatment Enforcement Section

TO: Regional Pretreatment Coordinators, Regions I-X

During a recent Pretreatment Coordinator's conference call with Headquarters pretreatment staff, a suggestion was made to prepare a one page visual summary of how to determine Significant Noncompliance (SNC) for Industrial Users (IUs). This request was made in response to the Agency's policy memorandum explaining the correct procedure for applying the SNC definition to IUs. As a result of that request, we have prepared such a visual summary and are now making it available for distribution to your Approved States and POTWs.

The summary presents a chronological example of the steps which a Control Authority should follow when evaluating the compliance status of an industrial user vis-a-vis the SNC definition. The example assumes a "Pretreatment Year" (or "Year") equal to the calendar year and brackets the "Year" with heavy black lines to separate it from the previous and subsequent "Years."

The example illustrates the rolling quarters concept by presenting the six month evaluation periods for SNC determination as coupled quarters. For the purpose of the attached example, the end of each relevant quarter (i.e., the date on which the SNC determination should be made) is March 30th, June 30th, September 30th, and December 31st. As outlined in the policy memorandum, the POTW must publish all IUs which were identified in SNC during the "Year," unless the IU was previously published for violations which occurred solely in the last quarter of the previous "Year."

If you have any questions regarding this summary or the application of the definition in general, please feel free to call Lee Okster of my staff at (FTS) 260-8329.

cc: Jeff Lape

Determination of Industrial User (IU) Significant Noncompliance (SNC)

1. The POTW (in conjunction with the Approval Authority) must establish its "Pretreatment Year."

2. At the end of each quarter, POTWs and States should evaluate their IU's compliance status for the two criteria which are evaluated on a six month time frame (i.e., the "A" and "B" criteria - 403.8(f)(2)(vii)(A) and (B)) as illustrated below. The example below assumes a " Pretreatment Year" equal to the calendar year.

FIRST EVALAUTION PERIOD

End of previous "Pretreatment Year"

Beginning of the current "Pretreatment Year."

Oct.	Nov.	Dec.	Jan.	Feb.	Mar.

SECOND EVALUATION PERIOD

Jan.	Feb.	Mar.	Apr.	May	Jun

THIRD EVALUATION PERIOD

Apr.	May	Jun.	Jul.	Aug.	Sep

FOURTH EVALUATION PERIOD

Jul.	Aug.	Sep.	Oct.	Nov.	Dec

End of the current "Pretreatment Year."

3. At the end of the first quarter (March 30th in our example), the POTW must evaluate the data from an industrial user for the previous six months (e.g., beginning with October 1 of the previous "Pretreatment Year" as in our example). Likewise, the POTW must evaluate six months of data at the end of each subsequent quarter (e.g., June 30th, September 30th, and December 31st).

4. At the end of the "Pretreatment Year," the POTW must summarize the compliance status of its industrial users over the reporting period and report on this compliance status to the Approval Authority. The POTW must publish all industrial users which were identified in SNC during the "Pretreatment Year," unless the IU was previously published for violations which occurred solely in the last quarter of the previous "Year."

Apartments

June 2002

Dear Addison Resident:

The Dallas Metroplex is expected to grow at a rapid pace in the next five years and is quickly reaching a point that water consumption, with anticipated peak demand, is projected to exceed treatment plant capacity by 2007. Since Addison shares water sources with the Dallas Metroplex, all of our water consumers are affected. The consequences could include water restrictions and shortages during peak usage times. We are working with Dallas and surrounding communities to conserve this key resource and use it wisely.

The Town of Addison is cutting back on water usage through several programs including:

- Timing irrigation between the hours of 10:00 p.m. and 7:00 a.m. to miss peak usage
- Installing rain and freeze sensors on all new irrigation systems
- Carefully placing irrigation heads to only water where needed
- Using plants and trees that are low water consumers

A few things that you can do include:

- Fix all leaking faucets and toilets (use the enclosed leak detector tablets to check for leaking toilets)
- Install water efficient showerheads that use 30% to 70% less water
- ~~Use native and adapted plants requiring 80% less water than non-native~~
- ~~Water at night and install rain sensors on sprinkler systems~~

The enclosed brochures will help with more tips. In addition to conservation tips, the enclosed 2001 Annual Drinking Water Quality Report will tell you what's in your drinking water. Check for more information and alerts on www.ci.addison.tx.us.

Working together we can all help to conserve this most valuable resource, clean water.

Sincerely,

Michael E. Murphy, P.E.
Director of Public Works
Town of Addison

Sue Ellen Fairley

From: Sharon Bell
Sent: Friday, June 07, 2002 2:31 PM
To: Sue Ellen Fairley
Cc: Jim Pierce
Subject: Letters for Water Conservation Package

Hi Sue Ellen,

Thanks for helping with this! I've attached three letters. One is to residents who own a home and they need 1630 copies. The second is to residents who live in apartments and they need 6250 copies. The third is for businesses and they need 1450.

Thanks,
Sharon

homeletter.doc apartletter.doc busletter.doc

TO: BSP 6/11/02
Will be here
Friday @ Noon

TNRCC File

TOWN OF ADDISON ®
PUBLIC WORKS DEPARTMENT
Post Office Box 9010 Addison, Texas 75001-9010
(972) 450-2871
16801 Westgrove

7 March 2002

Mr. Jerry Salgado
Plans Review and Design Team
Texas Natural Resources Conservation Commission (TNRCC)
12100 Park 35 Circle
Building F, Room 3101
Austin, TX 78753

RE: Town of Addison, Texas, Water Distribution System
Request for TNRCC Elevated Storage Waiver

Dear Mr. Salgado:

This is to transmit one copy of our "Water Distribution System Elevated Storage Tank Waiver Request" dated March 2001. The Waiver Request is in report form and has been prepared by Shimek, Jacobs & Finklea, our Consulting Engineer. The Report shows that we have sufficient ground water storage and pumping capacity to satisfy our water supply needs without the need for additional elevated storage.

Your consideration of this waiver request will be most appreciated.

Very truly yours,

Michael E. Murphy, P.E.
Director of Public Works

MM:sef

cc: Chris Terry, Assistant City Manager
Jim Pierce, P.E., Assistant Public Works Director
Keith Thompson, Utilities Foreman

Attachment: (As noted above)

TOWN OF ADDISON

PUBLIC WORKS DEPARTMENT

Post Office Box 9010 Addison, Texas 75001-9010

(972) 450-2871

16801 Westgrove

May 2, 2001

Mr. Andrew J. Johnson, P.E.
Plans Review and Rate Design Team
Texas Natural Resources Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

Re: Town of Addison, Texas, Water Distribution System
Request for TNRCC Elevated Storage Waiver

Dear Mr. Johnson:

This is to transmit one copy of our "Water Distribution System Elevated Storage Tank Waiver Request" dated March, 2001. The waiver request is in report form and has been prepared by Shimek, Jacobs & Finklea, our consulting engineer. The report shows that we have sufficient ground water storage and pumping capacity to satisfy our water supply needs without the need for additional elevated storage.

Your consideration of this waiver request will be most appreciated.

Very truly yours,

Michael E. Murphy, P.E.
Director of Public Works

Cc: Chris Terry, Assistant City Manager
Jim Pierce, P.E., Assistant Public Works Dire
Keith Thompson, Utilities Foreman

Attachment

TNRCC
Jerry Salgado
Plan review and Design Team
12100 Park 35 circle Bld. F Room 3101
Austin, TX
78753

Mike
F.Y.I

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

January 29, 2002

ADDISON TOWN OF
PO BOX 9010
ADDISON, TX 75001

Subject: Public Drinking Water Supply
ADDISON TOWN OF - PWS ID #0570031
DALLAS County, Texas

Dear Public Water Supply Official:

Information received in this office as a result of a recent inspection conducted by your local Regional office of the TNRCC indicates that the population served by the water supply has changed such that we must adjust the number of coliform monitoring samples required each month. Before this most recent inspection the population figure in our records was **25689**. The recent information we received indicates a new population served of **14166**. This population change requires that the number of samples collected each month be adjusted from **25** to a new required number of **15. Since this number of samples required is less than the number of samples required previously we have already made this change in our database.**

The new number of samples required is the minimum number required to be submitted. You may submit as many routine monthly sample as you wish. If you believe that more samples are necessary to adequately monitor your public water system then submit the number you believe necessary, but it must be at least the minimum number the TNRCC requires.

As indicated, the number of samples required to be submitted is based on the population served by the public water system. The population data is collected from the public water system at the time of the inspection. For community public water supplies other than cities the population figure is arrived at by multiplying the number of connections by three. This office is reviewing census data from the Census Bureau website to obtain population figures. If you have questions regarding the population served or this change in the number of samples required, you may contact me at (512) 239-6058.

Sincerely,

Larry E. Mitchell

Larry E. Mitchell
Water Quality Monitoring Team
Public Drinking Water Section
Water Supply Division

LEM:ad

cc: TNRCC Region 4

supervise. Each operating company shall provide this information for itself and for each of its operators. See Section 290.47 of this title (relating to Appendices).

(s) **Special Precautions.** In the event of low distribution pressures (below 20 psi), water outages, repeated unacceptable microbiological samples or failure to maintain adequate chlorine residuals, special precautions must be instituted by the water system owner or responsible official. A flowchart has been provided to guide water system owners and operators in taking appropriate action in the above situations. This flowchart can be found in Section 290.47(h) of this title (relating to Appendices). If the flowchart indicates that a boil water notification is required, the system must notify its customers within 24 hours using the prescribed notification format as specified in Section 290.47 (e) of this title (relating to Appendices). A copy of this notice shall be provided to the executive director. Bilingual notification may be appropriate based upon local demographics. Boil water notices shall remain in effect until water distribution pressures in excess of 20 psi can consistently be maintained, a minimum of 0.2 mg/l free chlorine residual or 0.5 mg/l chloramine residual (measured as total chlorine) is present throughout the system and water samples collected for microbiological analysis are found negative for coliform organisms. Once the above conditions are met, the customers must be notified in a manner similar to the original notice. Other protective measures may be required at the discretion of the executive director.

(t) **Water leakage.** All water storage facilities, distribution system lines and related appurtenances shall be maintained in a watertight condition.

(u) **Minimum pressures.** All public water systems shall be operated to provide a minimum pressure of 35 psi throughout the distribution system under normal operating conditions. The system shall also be operated to maintain a minimum pressure of 20 psi during emergencies such as fire fighting.

(v) **Testing equipment.** Testing equipment or some other means of monitoring the effectiveness of any chemical treatment processes used by the system must be provided.

(w) **System ownership.** All community water systems shall post a legible sign at each of its production, treatment, and storage facilities. The sign shall be located in plain view of the public and shall provide the name of the water supply and an emergency telephone number where a responsible official can be contacted.

(x) **Abandoned wells.** Abandoned public water supply wells owned by the system must be plugged with cement according to the water well drillers rules Chapter 338 of this title. Wells that are not in use and are non-deteriorated (as defined in 30 TAC Chapter 338) must be tested every five years or as required by the executive director to prove that they are in a non-deteriorated condition. The test results shall be sent to the Commission's water utilities division for review and approval. Deteriorated wells must be either plugged with cement or repaired to a non-deteriorated condition.

(y) **Electrical wiring.** All water system electrical wiring must be installed in a securely mounted conduit in compliance with a local or national electrical code.

Amended Effective Date: March 3, 1997

Section 290.47. Appendices.

(a) **Requirements.** Public water supply systems which achieve and maintain recognition must exceed the minimum acceptable standards of the Commission in these sections.

(1) To attain recognition as a "superior public water system," the following additional requirements must be met:

(A) Physical facilities shall comply with the requirements in these sections.

(B) There shall be a minimum of two certified operators with additional operators required for larger systems.

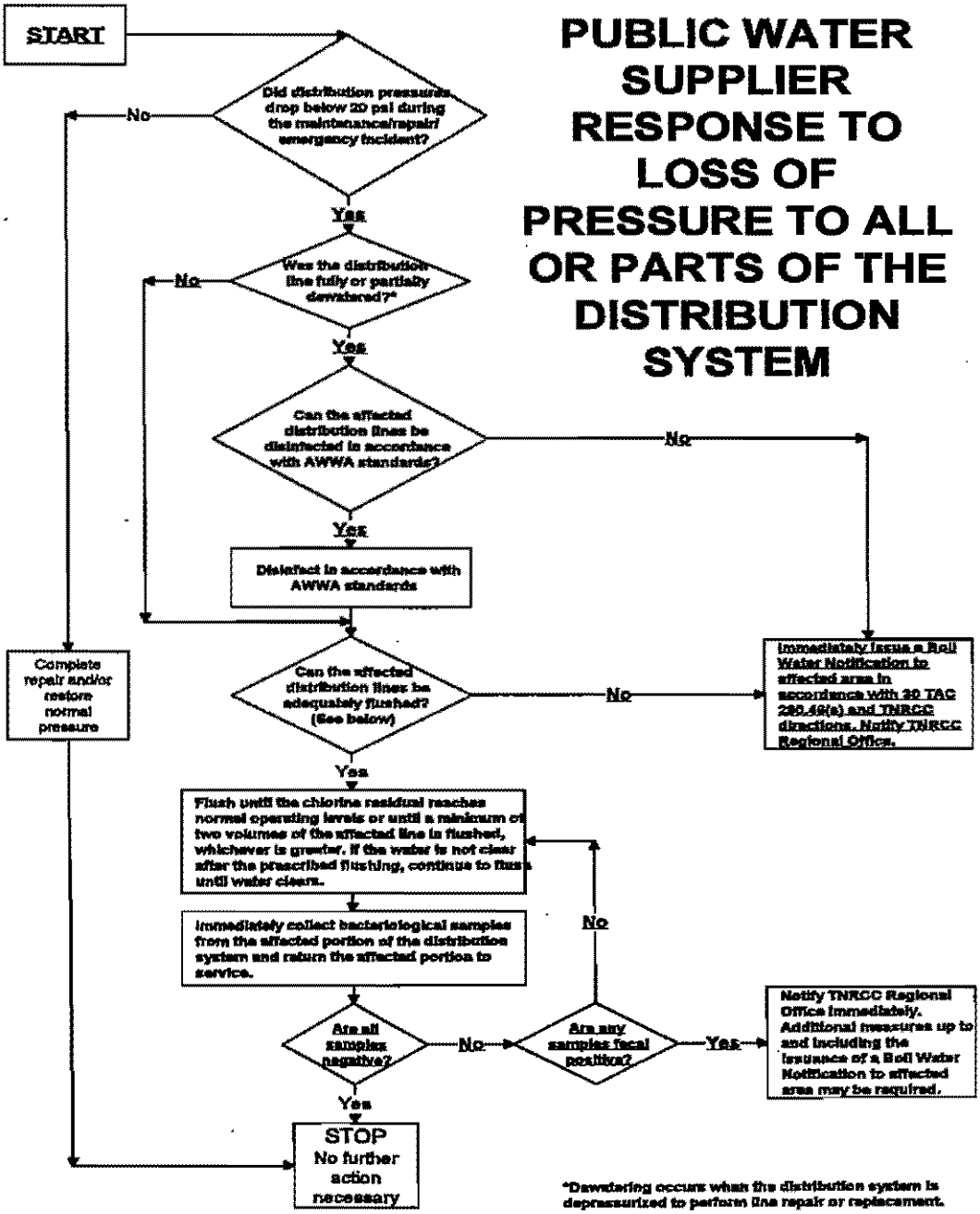
(C) The system's microbiological record for the previous 24 months period shall indicate no violations (frequency, number or MCL) of the drinking water standards.

(D) The quality of the water shall comply with all primary water quality parameters listed in the drinking water standards.

(E) The chemical quality of the water shall comply with all secondary constituent levels listed in the drinking water standards.

(F) The system's operation shall comply with applicable state statutes and minimum acceptable operating practices set forth in Section 290.46 of this title (relating to Minimum Acceptable Operating Practices for Public Drinking Water Supplies).

Appendix H. Special Precautions Flowchart.



Amended Effective Date: March 3, 1997

TNRCC Miller's office

FAX TRANSMITTAL

DATE: August 2001

NUMBER OF PAGES: 1
(Including this cover sheet)

FROM: Texas Natural Resource Conservation Commission
Pixie Wetmore
TNRCC/Region 4 - Arlington
Phone: 817-588-5849 (will remain the same)
Fax: 817- 588-5701 (new fax as of 8-20-01)

Note:

Effective **August 20, 2001,** the TNRCC Arlington Region Office will move to a new location and assume a new name. Our office will now be called the DFW Region Office and be relocated to Ft. Worth. Listed below are the new address, phone and fax numbers. All individual investigator phone numbers will remain unchanged. Please update your records to reflect these changes.

Address
TNRCC DFW Region Office
2301 Gravel Drive
Fort Worth, TX 76118-6951

Phone Number	
Main office	817-588-5800

Fax Numbers	
Main Fax	817-588-5700
Water Fax	**817-588-5701**
Air	817-588-5702
Waste/PST	817-588-5703
Administration	817-588-5704
File Review	817-588-5720

Call if you have any questions.

New TNRCC

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR WATER QUALITY TPDES PERMIT RENEWAL FOR INDUSTRIAL WASTEWATER

PERMIT NO. 03950

APPLICATION AND PRELIMINARY DECISION. Bruce Hardwood Flooring LLC, 16803 Dallas Parkway, Addison, Texas 75001, which operates a laminated hardwood processing facility, has applied to the Texas Natural Resource Conservation Commission (TNRCC) for a renewal of TPDES Permit No. 03950, which authorizes the discharge of log storage water (boiler blowdown, storm water and raw water) on an intermittent and flow variable basis via Outfalls 001 and 002. This application was submitted to the TNRCC on October 4, 2000.

The facility is located at 1100 Cotton Ford Road in the City of Center, Shelby County, Texas. The effluent is discharged to an unnamed creek; thence to Prairie Creek; thence to Tenaha Creek; thence to Toledo Bend Reservoir, in Segment No. 0504 of the Sabine River Basin. The unclassified receiving waters have limited aquatic life use for the unnamed creek. The designated uses for Segment No. 0504 are high aquatic life use, contact recreation and public water supply.

The TNRCC executive director has completed the technical review of the application and prepared a draft permit. The draft permit, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the draft permit. The permit application, statement of basis/technical summary and executive director's preliminary decision, and draft permit are available for viewing and copying at the Shelby County Courthouse, 200 San Augustine Street, Center, Texas 75935.

PUBLIC COMMENT / PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit written or oral comment or to ask questions about the application. The TNRCC will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

Written public comments and requests for a public meeting should be submitted to the Office of the Chief Clerk, MC 105, TNRCC, P.O. Box 13087, Austin, TX 78711-3087 within 30 days of the date of newspaper publication of this notice.

OPPORTUNITY FOR A CONTESTED CASE HEARING. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material, or significant public comments. **The response to comments, along with the executive director's decision on the application, will be mailed to everyone who submitted public comments or who requested to be on a mailing list for this application. If comments are received, the mailing will also provide instructions for requesting a contested case hearing or reconsideration of the executive director's decision.** A contested case hearing is a legal proceeding similar to a civil trial in a state district court.

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision on the application. Further, the Commission will only grant a hearing on issues that were raised during the public comment period and not withdrawn. Issues that are not raised in public comments may not be considered during a hearing. The TNRCC may act on this application to renew a permit without providing an opportunity for a contested case hearing if certain criteria are met.

EXECUTIVE DIRECTOR ACTION. The executive director may issue final approval of the application unless a timely contested case hearing request or a timely request for reconsideration is filed. If a timely hearing request or request for reconsideration is filed, the executive director will not issue final approval of the permit and will forward the application and requests to the TNRCC Commissioners for their consideration at a scheduled Commission meeting.

MAILING LISTS. In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices mailed by the Office of the Chief Clerk. You may request to be added to: (1) the mailing list for this specific application; (2) the permanent mailing list for a specific applicant name and permit number; and/or (3) the permanent mailing list for a specific county. Clearly specify which mailing list(s) to which you wish to be added and send your request to the TNRCC Office of the Chief Clerk at the address below. Unless you otherwise specify, you will be included only on the mailing list for this specific application.

INFORMATION. If you need more information about this permit application or the permitting process (such as being added to the mailing list), please call the TNRCC Office of Public Assistance, Toll Free, at 1-800-687-4040 or write to them at MC 105, P. O. Box 13087, Austin, Texas, 78711-3087. General information about the TNRCC can be found at our web site at www.tnrcc.state.tx.us.

Further information may also be obtained from Bruce Hardwood Flooring LLC at the address stated above or by calling Mr. Nick Graves at 214/887-2341.

Issued:

JUL 30 2001

LaDonna Castañuela, Chief Clerk
Texas Natural Resource Conservation Commission

dallas water utilities
city of dallas

June 14, 2001

To: All Wholesale Customer Cities

Enclosed you will find a copy of the *Guide to the Texas Natural Resource Conservation Commission*.

This general information publication describes the organization and main functions of the TNRCC.

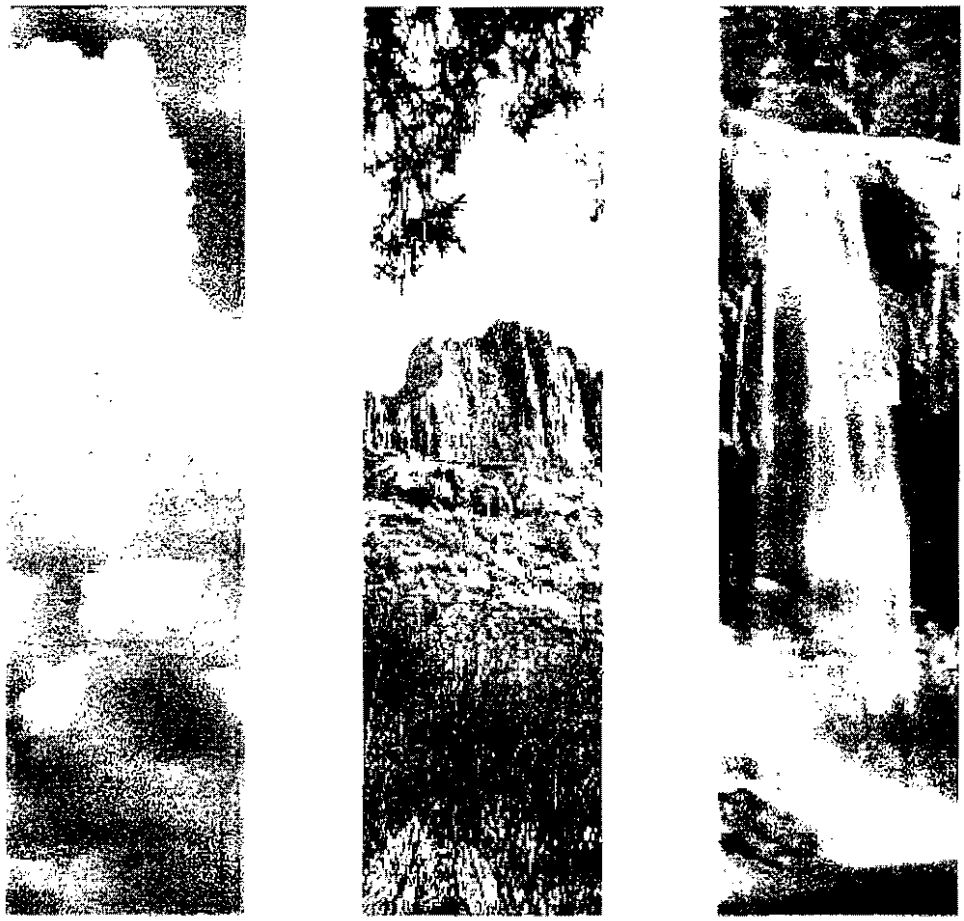
We thought this publication might be of some use to all our wholesale customers.

Sincerely,

Randy Stalnaker

Randy Stalnaker
Manager
Wholesale Services Division

Wholesale Services • 1500 Marilla, Room 4AN Dallas, Texas 75201
Telephone: (214) 670-5888 • Fax: (214) 670-3154



GUIDE TO THE TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

GI-001, Revised April 2001

GUIDE TO THE TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

GI-001, PDF version
(Revised April 2001)

The following guide describes the organization and main functions of the TNRCC, one of the most comprehensive state environmental agencies in the nation. The TNRCC has approximately 3,000 employees, 16 regional offices, and a $410.9 million annual appropriated budget for the 2000 fiscal year. Most of the budget is funded by regulatory program fees ($323.8 million, or 78.8 percent). Federal funds provide $53.4 million, or 13 percent; state general revenue provides $27.5 million, or 6.7 percent; and other sources provide the remaining $6.2 million or 1.5 percent.

Table of Contents

Mission Statement

The Texas Natural Resource Conservation Commission strives to protect our state's human and natural resources consistent with sustainable economic development. Our goal is clean air, clean water, and the safe management of waste.

Agency Philosophy

To accomplish our mission, we will:

- base decisions on the law, common sense, good science, and fiscal responsibility;
- ensure that regulations are necessary, effective, and current; apply regulations clearly and consistently; ensure consistent, just, and timely enforcement when environmental laws are violated;
- ensure meaningful public participation in the decision-making process;
- promote and foster voluntary compliance with environmental laws and provide flexibility in achieving environmental goals; and
- hire, develop, and retain a high-quality, diverse workforce.

The Organization

GENERAL COUNSEL
PUBLIC INTEREST COUNSEL
ALTERNATIVE DISPUTE RESOLUTION

COMMISSIONERS

CHIEF CLERK
INTERNAL AUDIT
PUBLIC ASSISTANCE

AGENCY COMMUNICATIONS
INTERGOVERNMENTAL RELATIONS

EXECUTIVE DIRECTOR
DEPUTY EXECUTIVE DIRECTOR

SMALL BUSINESS AND ENVIRONMENTAL ASSISTANCE

OFFICE OF ADMINISTRATIVE SERVICES

Chief Financial Officer
Budget & Planning
Financial Administration
Information Resources
Human Resources & Staff Development
Support Services

OFFICE OF LEGAL SERVICES

General Law
Environmental Law
Litigation

OFFICE OF COMPLIANCE AND ENFORCEMENT

Field Operations
Compliance Support
Enforcement
Monitoring Operations

OFFICE OF PERMITTING, REMEDIATION AND REGISTRATION

Air Permits
Registration, Review & Reporting
Remediation
Waste Permits
Water Permits & Resource Management

OFFICE OF ENVIRONMENTAL POLICY, ANALYSIS AND ASSESSMENT

Strategic Assessment
Policy & Regulations
Technical Analysis

Office of the Commissioners

Robert J. Huston, Chairman
R.B. "Ralph" Marquez, Commissioner
John M. Baker, Commissioner
Staff telephone listings, page 10

Three full-time commissioners are appointed by the governor to establish overall agency direction and policy, and to make final determinations on contested permitting and enforcement matters. They are appointed for six-year terms with the advice and consent of the Texas Senate. A commissioner may not serve more than two six-year terms, and the terms are staggered so that a different member's term expires every two years. The governor also names the chairman of the commission.

Robert J. Huston of Austin was appointed as chairman January 7, 1999, to fill an unexpired term. His term expires August 31, 2003. Ralph Marquez of Texas City was appointed May 1, 1995, to fill an unexpired term. His first term expired August 31, 1999, and he was reappointed for a second term that expires August 31, 2005. John Baker, a native of Temple, was appointed September 8, 1995. His appointment is scheduled to expire August 31, 2001. All three commissioners were appointed by former Governor George W. Bush.

The following six offices report directly to the commissioners:

General Counsel

Staff telephone listings, page 10

The general counsel is the chief legal and the chief ethics advisor for the agency. The general counsel provides legal assistance to the commissioners for their review of permits, proposed enforcement actions, rules, and other matters. The counsel also manages the administrative affairs of the commissioners' office.

Alternative Dispute Resolution

Staff telephone listings, page 10

This office assists permit applicants and persons who request contested hearings in resolving their differences informally, if possible, to avoid the time and expense of an evidentiary hearing. Alternative dispute resolution (ADR) is voluntary, and participation in ADR does not forfeit a person's right to a hearing if ADR does not result in a settlement.

Chief Clerk

Staff telephone listings, page 10

The chief clerk is responsible for posting required notices of applications, public hearings, and meetings in the *Texas Register*. The chief clerk also prepares the commission agendas, transmits final decision documents to applicants and other parties, and maintains the official records of commission proceedings.

Internal Audit

Staff telephone listings, page 10

Internal Audit assists TNRCC management by evaluating agency control systems and auditing program, management, and electronic data operations for economy, efficiency, and effectiveness.

Public Assistance

Staff telephone listings, page 10
Toll-free telephone number: 1-800-687-4040

Public Assistance staff answer questions from individuals about permits, interpret technical information, and explain how the TNRCC makes permit decisions and how citizens may participate in the permitting process. Also available in this office are environmental equity staff who help minority and low-income communities work toward solutions to problems with industries and facilities near their homes by encouraging communication and cooperation.

Public Interest Counsel

Staff telephone listings, page 10

This office was created to ensure that the public's interest is considered in actions of the commission. Although the Office of Public Interest Counsel does not formally represent citizens, its role is to ensure that the public's interest is represented in issues considered by the commission.

Office of the Executive Director

Jeffrey A. Saitas, Executive Director
Glenn Shankle, Deputy Executive Director
Staff telephone listings, page 11

The executive director, who is hired by the commissioners, is responsible for managing the agency's day-to-day operations. Jeffrey A. Saitas was promoted to executive director effective

June 20, 1998. Major responsibilities include implementation of commission policies, making recommendations to the commissioners about contested permitting and enforcement matters, and approving uncontested permit applications and registrations.

The deputy executive director assists the executive director in the administration of the agency. Glenn Shankle was promoted to deputy executive director on June 20, 1998.

Three divisions report directly
to the executive director.

Agency Communications

Staff telephone listings, page 11

Agency Communications strives to continuously improve and streamline the delivery of print and electronic information to the public. This division also coordinates the agency response to all media inquiries, prepares and distributes agency news releases, and coordinates news conferences.

Intergovernmental Relations

Staff telephone listings, page 11

Intergovernmental Relations (IGR) coordinates the agency response to legislative inquiries and constituent issues, legislative initiatives, and interim committee studies affecting the agency. IGR also coordinates the agency's testimony and participation during legislative sessions and ensures that the legislature is informed of the TNRCC's initiatives and activities.

Small Business and Environmental Assistance

Staff telephone listings, page 11
Toll-free telephone lines:
Local Government, 1-800-687-9222
Small Business Assistance, 1-800-447-2827

This division helps customers prevent pollution, conserve resources, and comply with regulations. Staff members work to educate customers in Texas and along both sides of the Texas section of the U.S.-Mexico border through seminars, trade fairs, workshops, toll-free hot lines, and on-site technical assistance. The division also recognizes environmental achievements and inspires successes through voluntary programs, awards, and special events. The division provides educational information and recycling and disposal opportunities for Texans; promotes recycling and composting through market development; provides technical assistance to small business and local governments; promotes regulatory flexibility; administers the reporting requirements for the Waste Reduction Policy Act; reviews applications for pollution control property tax exemptions; and works to make businesses aware of innovative technology that may help them prevent pollution.

Five office clusters report to the executive director.
Each cluster is headed by a deputy director.
These deputies are responsible for administering the agency's regulatory and administrative programs.

Office of Administrative Services

Grace Montgomery Faulkner, Deputy Director

Staff telephone listings, page 12

This office is responsible for providing many of the services that are essential to any large public service organization. These services include strategic planning, budgeting, human resources, financial administration, administrative audits, financial assurance, computer resources, and facilities support and maintenance.

Chief Financial Officer

Staff telephone listings, page 12

The Chief Financial Officer oversees all budgeting and financial issues in the agency. This office develops and submits the agency's strategic plan, biennial appropriations request, and quarterly performance reports to the legislature and the governor. The office also prepares, submits, and monitors all of the agency's federal grant applications and work plans, providing centralized grants management in support of TNRCC programs. In addition, the office audits contracts, grants and fee revenue, ensures compliance with contract and grant regulations, provides risk assessment, and serves as state/federal audit liaison. The office also monitors revenue and estimates revenue collections.

Budget and Planning

Staff telephone listings, page 13

The Budget and Planning Division develops and monitors the TNRCC's annual operating budget and assists in the development of the agency's biennial legislative appropriations request. The division also performs special analyses throughout the year to ensure that appropriate funds are expended effectively and efficiently to achieve agency goals and priorities.

Financial Administration

Staff telephone listings, page 13

The Financial Administration Division is responsible for managing the agency's financial transactions, ensuring the integrity of the accounting records, and maintaining adequate internal controls to safeguard the agency's financial assets. This division comprises four sections: Disbursements, Revenue, Procurements and Contracts, and Financial Reporting. Included in these sections are various responsibilities including payroll, payments to employees and vendors, billing and collection of fees and federal grants, financial assurance, procurements of goods and services, monitoring participation by historically underutilized businesses (HUBs), and providing financial reports.

Human Resources and Staff Development

Staff telephone listings, page 13

This division supports the agency's mission by performing a wide range of personnel services. For example, the division recruits qualified staff to fill openings; designs, develops, and delivers needs-based training; administers employee benefit programs, such as health insurance and retirement plans; and ensures compliance with state and federal laws on equal opportunity and fair labor practices. As part of its training responsibilities, the division surveys and adopts new technology, such as computer-based training.

Information Resources

Staff telephone listing, page 14

The Information Resources Division provides systems management support for all agency computers and develops and supports software to meet internal and external customer needs. Staff maintain agency records facilities and serve as a clearinghouse for providing agency database information to the public and other government agencies. Division staff also coordinate the preparation of the Information Resources Strategic Plan and the Biennial Operating Plan.

Support Services

Staff telephone listings, page 15

The Support Services Division maintains facilities and equipment for other TNRCC programs, handles risk management and workers' compensation claims, provides safety training, and conducts safety inspections. Additionally, the division provides security for agency facilities, provides copying and mail service, and manages all the agency's physical assets.

Office of Compliance and Enforcement

Mark Vickery, Deputy Director

Staff telephone listings, page 15

This office oversees agency enforcement, emergency response, dam safety, monitoring activities, and the operations of 16 regional offices and two special project offices across the state.

Compliance Support

Staff telephone listings, page 16

This division maintains operator and installer certification, licensing and/or registration for several occupations. Examples include operators of wastewater facilities and waterworks, and installers of underground storage tanks, landscape irrigation systems, and on-site sewage facilities (OSSFs). In addition, this division manages the quality assurance program for federally funded activities and laboratory inspections.

Enforcement

Staff telephone listings, page 16

The Enforcement Division is responsible for ensuring that violations of state environmental laws are corrected. The division develops formal enforcement cases in accordance with state statutes and agency rules and in accordance with the agency's philosophy that enforcement, when necessary, must be swift, sure, and just. Specifically, the division drafts proposed enforcement orders that include appropriate penalties and orders for the commission's consideration and approval.

Field Operations

Staff telephone listings, page 17

The Field Operations Division consists of 16 regional offices and two special project offices located throughout the state, and a central office located in Austin. Major regional office responsibilities include:

- conducting investigations for compliance determination at the permitted and registered air, water, and waste facilities located across the state;
- investigating complaints at permitted and nonpermitted facilities/operations based on citizen requests for assistance;
- developing enforcement actions for most types of air, water, and waste violations identified during investigations;

- perform ambient monitoring for local and statewide air quality, drinking water monitoring for the protection of the public water supplies, and surface water monitoring to ensure the continued quality of streams, lakes, rivers, and other water bodies located throughout the state;
- overseeing and ensuring compliance with water rights and, when drought conditions exist, allocating the limited water resources in certain areas of the state;
- approving pollution abatement plans to ensure protection of the underground water supplies (aquifers) in certain areas of the state;
- administering the Dam Safety program;
- responding to emergency spills and upset/maintenance events statewide in a timely manner; and
- providing education and technical assistance to the community as needed.

Monitoring Operations

Staff telephone listings, page 20

This division is responsible for monitoring air and water quality within the state and for reporting that information to the public. Division staff examine and interpret the causes, nature, and behavior of air pollution in Texas. The division also operates central and mobile laboratories based in Austin and a laboratory in Houston that provide analytical services for air, water, and waste samples. It also performs forecasting of ground-level ozone concentrations in Texas cities.

Office of Environmental Policy, Analysis, and Assessment

Randy Wood, Deputy Director

Staff telephone listings, page 20

This office has four major functions: strategic environmental analysis and assessment; the coordination of all agency policy development and rulemaking; the coordination of border affairs; and the technical analysis of data to support these functions.

The office also handles a number of important projects having an agency-wide impact. Specific examples include biennially developing legislative implementation strategies; conducting monthly Regulatory Forums for information exchange with interested groups; and coordinating bill reviews, and the executive review of documents communicating the agency's national policy positions to the U.S. Environmental Protection Agency, Congress, federal agencies, and national organizations.

Border Affairs staff is the TNRCC lead in four areas: working with TNRCC regional offices on the border to resolve concerns for border residents and serving as a clearinghouse for border information; forging cross-border agreements and programs with Mexican counterparts at the local, state, and federal levels, and other stakeholders, including the private sector and non-governmental organizations, on common environmental problems; working on issues that affect Texas with entities related to the North American Free Trade Agreement, such as the Border Environment Cooperation Commission and the North American Development Bank; and developing and working on a range of issues with other U.S. border states, through the Western Governors' Association and the ongoing Border Governors' Conferences.

Policy and Regulations

Staff telephone listings, page 21

Policy development and rulemaking — two sides of the same regulatory coin — are vital functions of this division. Staff accomplish this through coordination and development of agency policy positions and regulations to meet state and federal requirements, to respond to emerging environmental challenges, and to assure conformance to the commission's guiding principles.

The division performs a variety of activities including the coordination of Regulatory Forums, Commissioners' Work Sessions, and statewide public hearings; the publication of agency rules in the *Texas Register*; the development of memoranda of understanding with other state agencies; maintenance of the online Rules Tracking Log; processing of rule petitions; and coordination with an internal rule liaison/management group to facilitate the regulation development process.

The division also chairs the Texas Groundwater Protection Committee and coordinates the activities of the Coastal Bend Bays Estuary Program and the Galveston Bay Estuary Program.

Strategic Assessment

Staff telephone listing, page 21

An outgrowth of one of the recommendations of the agency's 1997 Business Process Review, this division researches regional and statewide environmental issues for the purpose of setting priorities and developing informed strategies to improve and protect the state's environment. The division conducts such diverse projects as: the analysis of

environmental indicators, development of performance metrics, trends analysis, and comparative risks.

The Strategic Environmental Analysis (SEA) Group produces the agency's State of the Environment Report, which serves as Volume II of the agency's Strategic Plan. It also conducts evaluations of agency strategies and their impacts on environmental conditions. The division serves as the lead for the development of air quality state implementation plans; municipal and hazardous solid waste planning; and the Total Maximum Daily Load Program to address impaired surface water bodies.

Technical Analysis

Staff telephone listings, page 21

The Technical Analysis Division develops and updates the emissions inventory for all stationary, mobile, and area sources of air contaminants. Staff also provide information about the Toxics Release Inventory Program. The division provides computer modeling and data analysis in support of pollution control strategies, and designs and implements mobile source pollution reduction programs. In particular, the division designs, administers, monitors, and evaluates the vehicle inspection and maintenance programs, the Texas Clean Fleet and Texas clean fuels programs, and provides information and advice on voluntary mobile source emission reduction strategies. In addition, the group performs surface water quality planning and assessments under the Texas Clean Rivers Program, and the Nonpoint Source Pollution Management Program, performs groundwater quality planning and assessments, and provides support for the Texas Groundwater Protection Committee.

Office of Legal Services

Jim Phillips, Deputy Director

Staff telephone listings, page 22

This office manages the agency's legal and litigation coordination services and provides general legal services for agency operations. The office's mission is to provide legal counsel and support to the executive director; to the agency's program areas; and, in conjunction with the Office of General Counsel and the Office of Public Interest Counsel, to the commissioners. Division goals are to ensure that commission decisions follow the law, and that rules developed by the agency comply with statutory authority and are applied consistently.

Environmental Law

Staff telephone listings, page 22

The Environmental Law Division supports the air, water, waste, and pollution cleanup programs. The division provides legal counsel to the agency in all areas of permitting, and rulemaking, and represents the executive director in contested permitting matters.

General Law

Staff telephone listings, page 23

The General Law Division primarily supports the Office of Administrative Services and provides legal counsel on issues related to personnel and employment law, contracts, public information processing and distribution, and records retention. The division also prepares the administrative records for appeals under the Administrative Procedures Act and provides the Office of Legal Services.with administrative support (paralegals and legal secretaries).

Litigation

Staff telephone listings, page 23

The Litigation Division provides legal representation and support primarily to the Office of Compliance and Enforcement. The division negotiates Agreed Enforcement Orders, litigates enforcement actions, manages delinquent fee and penalty actions, and coordinates the Supplemental Environmental Projects and Environmental Audits programs. The Special Investigations Section of the division investigates and prosecutes environmental crimes.

Office of Permitting, Remediation, and Registration

Leigh Ing, Deputy Director

Staff telephone listings, page 23

The Office of Permitting, Remediation and Registration is responsible for implementing the federal and state laws and regulations governing all aspects of permitting for the air, water, and waste programs; oversees the investigation and cleanup of hazardous pollutants released into the environment; registers and manages the reporting requirements for certain facilities; and implements the petroleum storage tank reimbursement program. Office staff in the agency's bankruptcy program pursue debtors in United States bankruptcy courts for

recovery of claims owed to the TNRCC. In addition, toxicology and risk assessment staff evaluate conditions that may have the potential to cause adverse health effects in the general public.

Air Permits

Staff telephone listings, page 23

The Air Permits Division has primary responsibility for processing permits of facilities that propose to emit pollutants into the air. Two major responsibilities for the division include the New Source Review and Title V Operating Permits. Under New Source Review, staff process permit applications and standard exemption registrations for all new and modifed sources of air emissions. All major industrial sites and certain non-major industrial sites are required to apply for a single operating permit, which codefies all state and federal regulations at a site into one permit. The Air Permits Division also oversees the Emission Reduction Credit Banking and Trading Program.

Registration, Review, and Reporting

Staff telephone listings, page 24

This division manages various notifications, registrations, reports and requests. These include:

- initial review of most air, water, and waste permits;
- reimbursement of eligible petroleum storage tank (PST) clean-up costs;
- industrial and hazardous waste registrations and reports;
- used oil and used oil filter registrations and reports;
- scrap tire registrations and reports;
- medical waste registrations and reports;
- sludge transportation registrations and reports;
- PST facility registrations and notifications;
- PST self certification of compliance;
- PST technical support;
- Stage II vapor recovery;
- Central Registry.

Remediation

Staff telephone listings, page 24

The Remediation Division oversees the investigation and cleanup of hazardous pollutants released into the environment. This includes activities conducted by responsible parties, state contractors, and the state itself. The division also seeks restoration of damaged natural resources resulting from such releases. Division programs include:

- Brownfields Redevelopment Initiatives
- Contracting Support
- Industrial Hazardous Waste (IHW) Corrective Action
- Innocent Owner/Operator Program (IOP)
- Natural Resource Trustee Program
- Petroleum Storage Tank Program
- Remediation Technical Support (TRRP)
- Superfund
- Superfund Site Discovery and Assessment
- Texas Risk Reduction Program (TRRP)
- Voluntary Cleanup Program (VCP).

Waste Permits

Staff telephone listings, page 25

The Waste Permits Division is responsible for permitting facilities that store, process, and/or dispose of industrial and hazardous waste, nonhazardous industrial waste, municipal solid waste, special waste, and international waste.

The division's staff also:

- performs technical analysis of industrial and hazardous waste;
- monitors mechanical integrity tests and is responsible for permitting Class 1 underground injection control wells used for the disposal of industrial and municipal waste fluids;
- inspects uranium Class I and Class III injection wells;
- reviews license applications for disposal of most radioactive materials, including low-level radioactive wastes that originate from nuclear power production, medical treatment, and research facilities; and
- provides groundwater protection recommendations for oil and gas wells, Class II disposal wells, enhanced recovery injection wells, cathodic protection wells and seismic programs through its surface casing program.

Water Permits and Resource Management

Staff telephone listings, page 26

The Water Permits and Resource Management Division is responsible for the quality, quantity, and availability of water in Texas. This division:

- oversees public drinking water protection by implementation of the Safe Drinking Water Act;
- provides source water assessments and protection for drinking water;
- provides oversight of water utilities and water districts;
- issues wastewater permits under the Texas Pollutant Discharge Elimination System;
- develops the Texas Surface Water Quality Standards;

+ updates the Water Quality Management Plan;
+ oversees the concentrated animal feeding operations (CAFOs) and stormwater runoff;
+ issues water rights permits;
+ provides support to interstate water compacts;
+ develops Water Availability Models for the river basins of Texas;
+ evaluates water conservation plans and drought contingency plans; and
+ issues permits and licenses for weather modification projects.

TNRCC Toll-free Numbers

The TNRCC does not support a general-access, toll-free telephone number. However, below is a list of 1-800 and 1-888 numbers maintained for specific uses. Please note that calls cannot be transferred to other areas of the agency from these connections.

INFORMATION LINES:

Local Government Assistance:
1-800-447-2827
Hot line for local governments to obtain information, advice, and assistance from the TNRCC.

Public Assistance on Permitting:
1-800-687-4040
One-stop calling for the general public to inquire about permitting activity within the TNRCC.

Small Business Assistance:
1-800-447-2827
Hot line for small businesses to request environmental information and how to comply with environmental regulations.

Smoking Vehicle Program:
1-800-453-7664
For use by the public to report smoking vehicles.

Superfund Community Relations Line:
1-800-633-9363
Local citizens may call with questions and concerns regarding state and federal superfund sites in their area.

REPORTING LINES:

Environmental Violations Hot Line:
1-888-777-3186
Texas residents can use this line to report environmental violations. They will be routed automatically to the closest TNRCC regional office. Callers after business hours may leave a recorded message.

Laboratory Reporting Line:
1-800-252-0237
Used by laboratories to report positive fecal coliform content in water samples.

PST/Stage II Vapor Recovery Hotline:
1-800-533-3AIR
Number posted on gasoline pumps for the public to report problems with pumps and for station owners to obtain information on pump requirements and/or technical advice. EPA mandated program.

Stephenville Special Project Office:
1-800-687-7078
Specifically for the Stephenville, Texas area. Used to receive complaints concerning dairy runoff, overflowing ponds, etc. Mandated by the Legislature.

Watermaster Water Usage Reporting Line:
1-800-733-2733
Used by water rights holders in the South Texas Watermaster's area to report water pumping/usage in advance.

The TNRCC is partnering with the private sector, the EPA, and other states to provide citizens across the country with a single source for local environmental and recycling information.
Call 1-800-CLEAN-UP or access the **Web site at: www.1800cleanup.org.**

Organizational Telephone Listings

Including Building/Floor & Mail Codes (MC)

(The area code for all telephone listings is 512 unless noted otherwise.)

COMMISSIONERS

- MAIN LINE 239-5500
- FAX 239-5533

Chairman	**Robert J. Huston**	Bldg.F/4	MC 100	239-5505
Executive Assistant	Stephanie Bergeron	Bldg.F/4	MC 100	239-5539
Assistant	Patsy Green	Bldg.F/4	MC 100	239-5505
Commissioner	**John M. Baker**	Bldg.F/4	MC 100	239-5510
Executive Assistant	Claire Arenson	Bldg.F/4	MC 100	239-5799
Assistant/Office Coordinator	Connie Lucas	Bldg.F/4	MC 100	239-5510
Commissioner	**R.B. "Ralph" Marquez**	Bldg.F/4	MC 100	239-5515
Executive Assistant	Dan Eden	Bldg.F/4	MC 100	239-5536
Assistant/Office Coordinator	Connie Lucas	Bldg.F/4	MC 100	239-5515
Administrative Assistant	Ashley Hartgrove	Bldg.F/4	MC 100	239-5500
General Counsel	**Duncan Norton**	Bldg.F/4	MC 101	239-5525
Administrative Assistant	Melissa Lucas	Bldg.F/4	MC 101	239-5234

ALTERNATIVE DISPUTE RESOLUTION

- MAIN LINE 239-4010
- FAX 239-4015

Director	**Carl X. Forrester**	Bldg.F/4	MC 222	239-4010
Administrative Assistant	Ashley Hartgrove	Bldg.F/4	MC 222	239-5500

CHIEF CLERK

- MAIN LINE 239-3300
- FAX 239-3311

Chief Clerk	**LaDonna Castañuela**	Bldg.F/1	MC 105	239-3300
Assistant/Office Manager	Ray Steele	Bldg.F/1	MC 105	239-1428
Receptionist	Melanie Mohair	Bldg.F/1	MC 105	239-3300
Notice Team Leader	Charlene Smith	Bldg.F/1	MC 105	239-3315
Agenda Team Leader	Dianna Tillerson	Bldg.F/1	MC 105	239-1948
Final Documents Team Leader	Deanna Avalos	Bldg.F/1	MC 105	239-3327

INTERNAL AUDIT

- MAIN LINE 239-0500
- FAX 239-3333

Director	**Steve Goodson**	Bldg.F/5	MC 107	239-0500
Administrative Assistant	Waleska D. Carlin	Bldg.F/5	MC 107	239-0500

PUBLIC ASSISTANCE

- MAIN LINE 239-4000
- Toll Free Number 1-800-687-4040
- FAX 239-4007

Director	**Jodena Henneke**	Bldg.F/4	MC 108	239-4085
Executive Assistant	Leta Willoughby	Bldg.F/4	MC 108	239-2207
Senior Program Specialist	Bridget Bohac	Bldg.F/4	MC 108	239-1056
Environmental Equity	Keith Caldwell	R4		817/588-5837
Correspondence	Shirley Bennion	Bldg.F/4	MC 108	239-4006

PUBLIC INTEREST COUNSEL

- MAIN LINE 239-6363
- FAX 239-6377

Public Interest Counsel	**Blas J. Coy, Jr.**	Bldg.F/4	MC 103	239-6363
Senior Attorney	Vic McWherter	Bldg.F/4	MC 103	239-6363
Executive Assistant	Leta Willoughby	Bldg.F/4	MC 103	239-2207
Administrative Assistant	Irene Molina	Bldg.F/4	MC 103	239-0628

• MAIN LINE				239-3900
• FAX				239-3939
Executive Director	**Jeffrey Saitas**	Bldg.F/4	MC 109	239-3900
Executive Assistant	Terri D. Seales	Bldg.F/4	MC 109	239-3900
Administrative Assistant	Barbara Robinson	Bldg.F/4	MC 109	239-1279
Administrative Assistant	Bertha Valadez	Bldg.F/4	MC 109	239-5818
Deputy Executive Director	**Glenn Shankle**	Bldg.F/4	MC 109	239-3900
Executive Assistant	Deborah Fine-Knapp	Bldg.F/4	MC 109	239-0825
Administrative Assistant	Shirley Ashworth	Bldg.F/4	MC 109	239-0592
Receptionist	Marita Griffin	Bldg.F/4	MC 109	239-3900

AGENCY COMMUNICATIONS DIVISION

• MAIN LINE				239-0010
• Media Line				239-5000
• FAX				239-5010
Director	**Andy Saenz**	Bldg.F/4	MC 118	239-5544
Executive Assistant	Denise Vasquez	Bldg.F/4	MC 118	239-5544
Natural Outlook Editor	Jorjanna Price	Bldg.F/4	MC 118	239-0154
Natural Resource Editor	Karen Goelkel	Bldg.F/4	MC 118	239-0046
Media Relations	**Patrick Crimmins**	Bldg.F/4	MC 118	239-5000
• FAX				239-5010
Administrative Assistant	Doug Falls	Bldg.F/4	MC 118	239-5000
Publishing	**Renee Carlson**	Bldg.F/4	MC 118	239-0032
• FAX				239-5010
Administrative Assistant	Carmen Garcia	Bldg.F/4	MC 118	239-0010
Lead Internet Developer, Account Coordinator (Comm./Exec.)	Elizabeth Carmack	Bldg.F/4	MC 118	239-1652
Account Coordinator (SBEA, OLS, OAS)	Jennifer Kramer	Bldg.F/4	MC 118	239-0045
Account Coordinator (OPRR)	Cliff Tyllick	Bldg.F/4	MC 118	239-4516
Account Coordinator (OCE, OEPAA)	Nancy Pagliarini	Bldg.F/4	MC 118	239-1971
Graphics Contracting	Mark Steinfeldt	Bldg.F/3	MC 194	239-0033
• FAX				239-0055
Library	Sylvia von Fange	Bldg.A/1	MC 196	239-0020
• FAX				239-0022
Publications Ordering	Senith Hickey	Bldg.A/1	MC 195	239-0028
• FAX				239-4488

INTERGOVERNMENTAL RELATIONS DIVISION

• MAIN LINE				239-3500
• FAX				239-3335
Director	**Steve (Stephen) Minick**	Bldg.F/4	MC 119	239-3500
Administrative Assistant	Janie Roman	Bldg.F/4	MC 119	239-0604
Legislative Liaison	Brian Christian	Bldg.F/4	MC 119	239-1760
Legislative Liaison	Kathy Beyer	Bldg.F/4	MC 119	239-1486
Legislative Liaison	Diane Mazuca	Bldg.F/4	MC 119	239-3504
Legislative Liaison	Isaac Jackson	Bldg.F/4	MC 119	239-3508

SMALL BUSINESS & ENVIRONMENTAL ASSISTANCE DIVISION

• MAIN LINE				239-3100
• Toll Free Number				1-800-447-2827
• FAX				239-3165
Director/Small Business Ombudsman/ Advocate	**Israel Anderson**	Bldg.E/1	MC 112	239-5319
Administrative Assistant	Juanette Oliver	Bldg.E/1	MC 112	239-3133
Strategic Partnerships Program	Ken Zarker	Bldg.E/1	MC 112	239-3145
Communications Coordinator	Diana Barkley	Bldg.E/1	MC 112	239-6642

Event Coordination & Education	**Harold Baughman**	Bldg.E/1	MC 113	239-6326
• FAX				239-3175
Agricultural Waste Collections	Will Wyman	Bldg.E/1	MC 113	239-4749
Household Hazardous Waste	Ingrid Dierlam McDonald	Bldg.E/1	MC 113	239-4747
Public Education and Outreach	Ted Hazen	Bldg.E/1	MC 113	239-3161
Teacher Education	Eunice Pearson-Hefty	Bldg.E/1	MC 113	239-0043
Workshops, Seminars, & Conferences	Sue Phillips	Bldg.E/1	MC 113	239-6327
Texas Environmental Excellence Awards	Dana Macomb	Bldg.E/1	MC 113	239-4745
Texas Recycles Day	Rebecca Lallier	Bldg.E/1	MC 113	239-3188
TNRCC Environmental Trade Fair	Harold Baughman	Bldg.E/1	MC 113	239-6326
Composting/Recycling	Alan Watts	Bldg.E/1	MC 113	239-6742
Environmental Information Line				1-800-CLEAN-UP
Pollution Prevention & Industry Assistance	**Ken Zarker**	Bldg.E/1	MC 112	239-0377
• FAX				239-3165
CLEAN TEXAS	Rob Borowski / Larissa Peter	Bldg.E/1	MC 112	239-3187 / 3766
Waste Reduction Planning	Thomas Vinson	Bldg.E/1	MC 112	239-3182
Innovative Technology	Gary McArthur	Bldg.E/1	MC 112	239-1917
RENEW/Material Exchange	Hope Castillo	Bldg.E/1	MC 112	239-3171
Pollution Prevention Week	Heidi Wittenborn	Bldg.E/1	MC 112	239-6319
Tax Relief for Pollution Control/ Prevention Property	Ron Hatlett	Bldg.E/1	MC 112	239-6348
Recycling Market Development	Woody Raine	Bldg.E/1	MC 112	239-6316
P2 Technical Services	Jeff Voorhis	Bldg.E/1	MC 112	239-3178
Texas/Mexico Border P2 Initiative	Pierre Lichaa	Bldg.E/1	MC 112	239-3132
Centralized Composting	Scott McCoy	Bldg.E/1	MC 112	239-6774
Recycling Technical Assistance	Brian Noble	Bldg.E/1	MC 112	239-6780
Administrative & Program Support	**Kathy Friar**	Bldg.E/1	MC 112	239-3131
Small Business & Local Government Assistance	**Tamra-Shae Oatman**	Bldg.F/1	MC 106	239-1066
• FAX				239-1065 / 1055
Small Business Assistance	Frank Salat	Bldg.F/1	MC 106	239-1860
Local Government Assistance	Sandra Johnson	Bldg.F/1	MC 106	239-4553
Toll Free Number				1-800-447-2827

ADMINISTRATIVE SERVICES

• MAIN LINE				239-0590
• FAX				239-0596
Deputy Director	Grace Montgomery Faulkner	Bldg.A/1	MC 179	239-3555
Executive Assistant	Kyle Baxter	Bldg.A/1	MC 179	239-3557
Executive Assistant	Eddie Molina	Bldg.A/1	MC 179	239-6245
Receptionist	vacant	Bldg.A/1	MC 179	239-0590

CHIEF FINANCIAL OFFICER

• MAIN LINE				239-0300
• FAX				239-2211
Chief Financial Officer	**Machelle Pharr**	Bldg.A/3	MC 180	239-0290
Executive Assistant	Connie Green	Bldg.A/3	MC 180	239-3326
Compliance, Evaluation & Audit Section	**Belinda Murphy**	Bldg.A/3	MC 220	239-6246
• FAX				239-6242
Fiscal Analysis Section	**Al Dos Santos**	Bldg.A/3	MC 180	239-0228
Strategic Planning & Appropriations	**Jeff Grymkoski**	Bldg.A/3	MC 120	239-0207
Federal Grants Section	**John Janak**	Bldg.A/3	MC 220	239-0212
• FAX				239-0222
Systems Development Project Manager	**Bob Jarcik**	Bldg.A/3	MC 180	239-0254

BUDGET & PLANNING DIVISION

- MAIN LINE 239-0200
- FAX 239-0222

Director	**Butch Smith**	Bldg.A/3	MC 183	239-0217
Executive Assistant	Mickie Hillman	Bldg.A/3	MC 183	239-0317
Operating Budget Manager	**Bob McGlasson**	Bldg.A/3	MC 183	239-1762

FINANCIAL ADMINISTRATION DIVISION

- MAIN LINE 239-0300
- FAX ..... 239-0371 / 2211

Director	**Becky D'Brien**	Bldg.A/3	MC 181	239-0300
Executive Assistant	Brenda Stott	Bldg.A/3	MC 181	239-2530
Historically Under-Utilized Business (HUB)	Kathy Robbins	Bldg.A/3	MC 181	239-0393
Receptionist	Yolanda Garza	Bldg.A/3	MC 181	239-4722
Disbursements Section	**David Becerra**	Bldg.A/3	MC 181	239-0264
Travel	Sergio Rey	Bldg.A/3	MC 215	239-0283
Travel Coordinator	Dee Dee Washington	Bldg.A/3	MC 215	239-0375
• FAX (Travel)				239-6768
Voucher Audit	Cindy Solis	Bldg.A/3	MC 216	239-0331
Payroll & Employee Time	Patti Machac	Bldg.A/3	MC 181	239-0287
• FAX (Payroll)				239-0296
Encumbrance	Dena Rotan	Bldg.A/3	MC 181	239-1798
Adjustments/Expenditure Corrections	Dena Rotan	Bldg.A/3	MC 181	239-1798
Financial Reporting Section	**Glenn Burnett**	Bldg.A/3	MC 181	239-6888
General Ledger	vacant	Bldg.A/3	MC 181	239-0300
Reports	Onofre Guerra	Bldg.A/3	MC 181	239-0297
Structure	Kelley Glaeser	Bldg.A/3	MC 181	239-0698
Procurements & Contracts Section	**Kerry Stennett**	Bldg.A/3	MC 181	239-3323
• FAX				239-6004 / 0371
General Information				239-0300
Procurements	Charlie Willis	Bldg.A/3	MC 182	239-0382
Contracts	Glendon Eppler	Bldg.A/3	MC 182	239-6858
Revenue Section	**Perry Walters**	Bldg.A/3	MC 181	239-6261
• FAX				239-0364
Cashiers Office	Elaine Reinbolt	Bldg.A/3	MC 214	239-0187
Cash Support/Reconciliations	John Racanelli	Bldg.A/3	MC 214	239-4989
Financial Assurance	John Racanelli	Bldg.A/3	MC 184	239-4989
Grant Billing	Linda Seward	Bldg.A/3	MC 214	239-0189
• FAX (Financial Assurance)				239-6242

HUMAN RESOURCES AND STAFF DEVELOPMENT DIVISION

- MAIN LINE: 239-0102
- Jobline (Recording) 239-0100
- FAX (Employment Applications Only) ..... 239-1919 / 0111

Director	**James L. Williams**	Bldg.A/1	MC 116	239-0104
Executive Assistant	Mike Farris	Bldg.A/1	MC 116	239-0485
Receptionist	Gail McCollough	Bldg.A/1	MC 116	239-0104
Budget Analyst	Cindy Jorgensen	Bldg.A/1	MC 116	239-0116
Career Ladder Coordinator	Melissa Applegate	Bldg.A/1	MC 116	239-5890
Employee Complaints Coordinator	Cecelia Bellinger	Bldg.A/1	MC 116	239-0165
Employee Records/Verifications	Tamika Pratt	Bldg.A/1	MC 116	239-3993
Employee Assistance Program (EAP)	Cecelia Bellinger	Bldg.A/1	MC 116	239-0165
Engineering & Sciences Internship Program	Carolyn Mercer	Bldg.A/1	MC 116	239-0160
Mickey Leland Internship	Debra Cyphers	Bldg.A/1	MC 116	239-0159
OAS Communications Coordinator	Melissa Applegate	Bldg.A/1	MC 116	239-5890
Performance Management	Cecelia Currie	Bldg.A/1	MC 116	239-0165
Recruitment	Carolyn Mercer	Bldg.A/1	MC 116	239-0160
Voluntary Trip Reduction/Telecommuting	Ita Ufot	Bldg.A/1	MC 116	239-1935
• FAX				239-2312

Compensation, Benefits &				
Employee Programs Manager	**Theresa Bentley**	Bldg.A/1	MC 116	239-0131
Benefits Coordinator *(A-H)*	Melissa Robertson	Bldg.A/1	MC 116	239-1259
Benefits Coordinator *(I-P)*	Lynn Cox	Bldg.A/1	MC 116	239-5647
Benefits Coordinator *(Q-Z)*	Felipa Sustaita	Bldg.A/1	MC 116	239-0143
Employee Programs &				
Special Leave Coordinator	Dolores Ornelas	Bldg.A/1	MC 116	239-0617
Personnel Action Processing	vacant	Bldg.A/1	MC 116	239-3665
Staffing Pattern	Janet Gurley	Bldg.A/1	MC 116	239-0487
• FAX				239-0168
Staffing & Classification Manager	**Connie Allen**	Bldg.A/1	MC 116	239-0162
Staffing	Charles Hilz	Bldg.A/1	MC 116	239-0148
Classification	Carolyn Nunley	Bldg.A/1	MC 116	239-0149
• FAX				239-0168
Staff Development/				
Training Development Manager	**Dewey Updegraff**	Bldg.A/1	MC 117	239-6765
Computer-Based Training	Susan Trostle	Bldg.A/1	MC 117	239-1733
Satellite Training & T-Net	Trisha Seguin	Bldg.A/1	MC 117	239-0564
Training Needs Assessments	Willie Bell	Bldg.A/1	MC 117	239-6895
Training Registration	Monnie DeUnger	Bldg.A/1	MC 117	239-0550
• FAX				239-5700

INFORMATION RESOURCES DIVISION

• MAIN LINE				239-0800
• FAX				239-0888
Director	**Yolanda Aleman**	Bldg.A/2	MC 197	239-3841
Assistant Director	**Bruce Humphrey**	Bldg.A/2	MC 197	239-1266
Executive Assistant	Betty Staedtler	Bldg.A/2	MC 197	239-0812
Budget and Planning	Paula Garner	Bldg.A/2	MC 197	239-0897
IT Purchase Auditor &				
Software License Administrator	Jennifer K. Martin	Bldg.A/2	MC 197	239-0781
Customer Service Center	**Yvonne Spence**	Bldg.A/2	MC 197	239-0496
Call Center Technical Support				**239-0911**
Call Center	Susan Franks	Bldg.A/2	MC 197	239-5877
• FAX				239-0514
Operations	Sylvia Cole	Bldg.A/2	MC 197	239-0783
Production Control and				
Reporting Services	Rodney Peschel	Bldg.A/2	MC 197	239-0983
				239-DATA (3282)
Records Services 1				
Bldg. F (Rm. 1301)	Toni Brown	Bldg.F/1	MC 212	239-0966
• FAX				239-0909
Bldg.F (RM. 1305)	Toni Brown	Bldg.F/1	MC 200	239-0966
• FAX				239-6211
Records Services 2				
Bldg.D (Rm. 190)	Karen Young	Bldg.D/1	MC 199	239-1153
• FAX				239-2930
Bldg. C (Rm. 108W)	Karen Young	Bldg.C/1	MC 198	239-1153
• FAX				239-1850
Public Information Officer	Yvonne Spence	Bldg.A/2	MC 197	239-0496
• FAX				239-0888
Public Information Coordinator	Mamie M. Black	Bldg.A/2	MC 197	239-4759
• FAX				239-0888
Records Retention Analyst	Sheila Fries	Bldg.A/2	MC 197	239-0172
• FAX				239-0888
Records Training	Karon Teague	Bldg.A/2	MC 197	239-0752
• FAX				239-0888
Infrastructure Management, *Acting*	**Bruce Humphrey**	Bldg.A/2	MC 197	239-1266
LAN Services Team 1 (Bldgs. A, D, E)	Diana T. Fruin	Bldg.A/2	MC 197	239-6053

LAN Services Team 2 (Bldgs. B, C, F)	Jerry Bowden	Bldg.F	MC 197	239-4130
Field Support	Rebecca Schiffel	Bldg.A/2	MC 197	239-6034
Unix and NT	Debra Elledge	Bldg.A/2	MC 197	239-0765
Network Operations Center	Charles Canupp	Bldg.A/2	MC 197	239-5144
Software Development and Maintenance	**Jim Gise**	Bldg.A/2	MC 197	239-1648
Development Team 1	Larry Armstrong	Bldg.A/2	MC 197	239-0899
Development Team 2	Kay Galluzzo	Bldg.A/2	MC 197	239-0750
Web/GIS Development	Richard Smith	Bldg.A/2	MC 197	239-5788
Project Management, *Acting*	**Danny Lambert**	Bldg.A/2	MC 197	239-0943
Technology Planning	John Tate	Bldg.A/2	MC 197	239-0834
Information Protection Officer	Pat Patterson	Bldg.A/2	MC 197	239-0858
Project Managers, *Acting*	Pam Lynn	Bldg.A/2	MC 197	239-0893
Database Administration	Phyllis York	Bldg.A/2	MC 197	239-0844
Development Coordination	Patricia Repka	Bldg.A/2	MC 197	239-5697

SUPPORT SERVICES DIVISION

- MAIN LINE 239-0070
- FAX 239-6222

Director	**Edward F. House**	Bldg.A/1	MC 185	239-0073
Executive Assistant	Sharon Goodman Lee	Bldg.A/1	MC 185	239-0060
Division Receptionist	Terri Smith	Bldg.A/1	MC 185	239-0070
Conference Room Scheduling	Terri Smith	Bldg.A/1	MC 185	239-CONF (2663)
Staff Services Section/ ADA Facilities Coordinator	**Diana S. Prewit**	Bldg.A/1	MC 192	239-0078
Administrative Assistant	Sharon Hickman	Bldg.A/1	MC 192	239-0080
Facilities Management	Ben Moreno	Bldg.A/1	MC 192	239-6233
Building Trouble Calls: Park 35 (Bldgs. A-F)	Sharon Hickman	Bldg.A/1	MC 192	239-0080
Plant Manager	Charlie Hoffman	Bldg.A/1	MC 192	239-0933
Mailroom & Messengers	John Wood	Bldg.A/1	MC 188	239-4446
Property Management & Supply	Richard Torres	Bldg.A/1	MC 193	239-0088
Supplies	Santo Porfirio	Bldg.A/1	MC 193	239-0088
Audio Visual	Terrell Shaw	Bldg.A/1	MC 193	239-0095
Fleet Management	Terrell Shaw	Bldg.A/1	MC 193	239-0095
Receiving	Rick Chaney	Bldg.A/1	MC 193	239-0093
Risk Management, Safety & Security Section	**David Bruton**	Bldg.A/1	MC 192	239-0489
Employee Health & Safety	Lauri Laudano	Bldg.A/1	MC 192	239-1819
Security	Ron Lowery	Bldg.A/1	MC 192	239-0232
Worker's Compensation	Cora Gratten	Bldg.A/1	MC 192	239-0245
Telecommunications Section	**Bob Miller**	Bldg.A/1	MC 187	239-5238
• FAX				239-0244
Customer Services	"B" Schipper	Bldg.A/1	MC 187	239-0240
Customer Services	Yolanda Castillo	Bldg.A/1	MC 187	239-0239
Admin. Unit	Roxanne De Leon	Bldg.A/1	MC 217	239-0237
Copy Services	Rex Brooks	Bldg.D/1	MC 190	239-3348
Building D Copy Center	Al Martinez	Bldg.D/1	MC 190	239-2950
Building F Copy Center	John Vasquez	Bldg.F/1	MC 191	239-3345

COMPLIANCE & ENFORCEMENT

- MAIN LINE 239-5100
- FAX 239-0532

Deputy Director	**Mark Vickery**	Bldg.C/3	MC 172	239-5100
Executive Assistant/ Communications Coordinator	Pattie Graef	Bldg.C/3	MC 172	239-5103
Special Assistant	Jennifer Sidnell	Bldg.C/3	MC 172	239-5445
Administrative Assistant	Dora Granja	Bldg.C/3	MC 172	239-5100

COMPLIANCE SUPPORT DIVISION

• MAIN LINE				239-6300
• FAX				239-2249
Director	**Carol V. Batterton**	Bldg.A/2	MC 176	239-6305
Executive Assistant	Loyce Stewart	Bldg.A/2	MC 176	239-6300
Installer Certification Section Manager	**Richard Craig**	Bldg.A/2	MC 178	239-6328
Administrative Assistant				239-6187
• FAX				239-6390
On-Site Research Council	Warren Samuelson	Bldg.A/2	MC 178	239-4799
On-Site Sewage Facility Installer Program		Bldg.A/2	MC 178	239-0914
• FAX				239-6390
Landscape Irrigator and Installer Program		Bldg.A/2	MC 178	239-6719
LPST Corrective Action Specialist and Manager Program		Bldg.A/2	MC 178	239-2192
Stage II Vapor Recovery Facility Representative Program		Bldg.A/2	MC 178	239-2191
UST Contractor and On-Site Supervisor Program		Bldg.A/2	MC 178	239-2191
• FAX				239-0533
Operator Certification Section Manager	**Juanita Lopez**	Bldg.A/2	MC 178	239-6139
Administrative Assistant				239-6165
• FAX				239-6272
Backflow Prevention Assembly Testers Program		Bldg.A/2	MC 178	239-6135
Customer Service Inspectors Program		Bldg.A/2	MC 178	239-6135
Municipal Solid Waste		Bldg.A/2	MC 178	239-6789
Residential Water Operator Program		Bldg.A/2	MC 178	239-6133
Visible Emissions Evaluator Program		Bldg.A/2	MC 178	239-1698
Wastewater Operations Company Program		Bldg.A/2	MC 178	239-0172
Wastewater Operator Program		Bldg.A/2	MC 178	239-0170
Water Operator Program		Bldg.A/2	MC 178	239-6133
Quality Assurance Section Manager	**Steve Stubbs**	Bldg.A/2	MC 176	239-6343
Administrative Assistant				239-5420
• FAX				239-4760
Laboratory Inspections/DMRQA				239-1518

ENFORCEMENT DIVISION

• MAIN LINE				239-2545
• FAX				239-2550 / 4562
Director	**Ann McGinley**	Bldg.C/1	MC 219	239-1864
Executive Assistant	Mary Jennings	Bldg.C/1	MC 219	239-1864
Budget Liaison	Randy Baylor	Bldg.C/1	MC 219	239-0437
Engineering Services Team	Jeff Greif	Bldg.B/1	MC 171	239-1534
• FAX				239-1911
Enforcement Section I	**David Bower**	Bldg.C/1	MC 169	239-2171
• FAX				239-1893
Multi-Media Management–Information Systems	Dianna Young	Bldg.C/1	MC 169	239-4792
Enforcement Team 1	Richard Clarke	Bldg.C/1	MC 169	239-2368
Enforcement Section II	**Lemarcus Johnson**	Bldg.C/1	MC 219	239-2545
• FAX				239-2550 / 4562
Administrative Support Team	Vanessa Davis	Bldg.C/1	MC 219	239-1993
Enforcement Team 3	Ricky Rasberry	Bldg.C/1	MC 134	239-4494
Enforcement Team 4	Juan Rodriguez	Bldg.C/1	MC 128	239-2551
Enforcement Section III	**John Young**	Bldg.C/1	MC 149	239-0422
• FAX				239-0134
Water Quality Management–Information Systems	Cindy Stanislawski	Bldg.C/1	MC 224	239-4569
Enforcement Team 5	Carol Piza	Bldg.C/1	MC 149	239-6729
Enforcement Team 6	John Sadlier	Bldg.C/1	MC 149	239-6012

FIELD OPERATIONS DIVISION

- MAIN LINE 239-0400
- FAX 239-0404

Director	**Zoe Rascoe**	Bldg.A/3	MC 174	239-0448
Executive Assistant	Rosalinda Escalon	Bldg.A/3	MC 174	239-0448
Technical Assistant	Jim Reed	Bldg.A/3	MC 174	239-0415
Office Evaluations	Steve Broad	San Angelo	Region 8	915/655-9479
Budget Liaison	Tracy Callen	Bldg.A/3	MC 174	239-4127
24-hour Emergency Spill Reporting Line				239-2507
Toll Free Number				1-800-832-8224

CENTRAL OFFICE

- MAIN LINE 239-0400
- FAX 239-0404

Administration Support

Assistant Division Director	**Debra Barber**	Bldg.A/3	MC 174	239-0412
Administrative Assistant	Elaine Burrows	Bldg.A/3	MC 174	239-3707
Field Operations Admin.		Bldg.A/3	MC 174	239-0201

Operations Support

Assistant Division Director	**Larry L. Smith**	Bldg.A/3	MC 174	239-0361
Executive Assistant/HR Coordinator	Wanda Grieger	Bldg.A/3	MC 174	239-0410

Program Support

Assistant Division Director	**Jennifer A. Sidnell**	Bldg.A/3	MC 174	239-6679
Administrative Assistant	Donna Canady	Bldg.A/3	MC 174	239-5725
Air Program Manager	Brad Toups	Bldg.A/3	MC 174	239-1872
Water Program Manager	vacant	Bldg.A/3	MC 174	239-6648
Waste Program Manager	Debbie Mamula	Bldg.A/3	MC 174	239-0044

REGIONAL OFFICES

Region 1 - Amarillo

- MAIN LINE 806/353-9251
- FAX 806/358-9545

Regional Director	**Brad Jones**	806/468-0501
Executive Assistant	Lanita Tidmore	806/468-0503
Air/Pantex	Rich Lee	806/468-0530
Water/Waste	Eddy Vance	806/468-0510
Perryton Special Project Office	Judy Headlee	806/435-8059
• FAX		806/434-8443
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		806/358-9545

Region 2 - Lubbock

- MAIN LINE 806/796-7092
- FAX 806/796-7107

Regional Director	**Jim Estes**	806/796-7092
Executive Assistant	Verna Talkmitt	806/796-7092
Water/Waste	Joe Bragg	806/796-7092
Air/Waste	James Jaggers	806/796-7092
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		See above

Region 3 - Abilene

- MAIN LINE 915/698-9674
- FAX 915/692-5869

Regional Director	**Winona Henry**	915/698-9674
Executive Assistant	Lynn McConnell	915/698-9674
Water	Charles Keith	915/698-9674
Waste/Air	Mike Burch	915/698-9674
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		See above

Region 4 - Arlington

- MAIN LINE 817/588-5800
- FAX (Mail Room) 817/795-2519

Regional Director ..... **Frank Espino** 817/588-5900
Assistant Regional Director ..... **Robert Ross** 817/588-5892
Executive Assistant ..... Jere Martin 817/588-5865
- FAX 817/274-4445

Air ..... Tony Walker 817/588-5902
- FAX 817/795-2941

Water ..... Sid Slocum 817/588-5901
- FAX 817/795-2946

Waste ..... Sam Barrett 817/588-5903
- FAX 817/795-2985

Stephenville Special Project Office *(Confined Animal Feeding Operations)* ..... 254/965-5624 or 1-800-687-7078
- FAX 254/965-5793

Upset and Maintenance Reporting ..... upset0X@tnrcc.state.tx.us
- FAX 817/795-2941

Region 5 - Tyler

- MAIN LINE 903/535-5100
- FAX 903/595-1562

Regional Director ..... **Leroy Biggers** 903/535-5100
Executive Assistant ..... Karen Stone 903/535-5110
Air ..... Charles Murray 903/535-5100
Water ..... Noel Luper 903/535-5100
Waste ..... Michael Brashear 903/535-5100
Upset and Maintenance Reporting ..... upset0X@tnrcc.state.tx.us
- FAX ..... See above

Region 6 - El Paso

- MAIN LINE 915/834-4949
- FAX 915/834-4940

Regional Director ..... **Archie Clouse** 915/834-4951
Administrative Assistant ..... Debbie Alarilla 915/834-4954
Air ..... Kevin Smith 915/834-4952
Water/Waste ..... Terry McMillan 915/834-4953
Upset and Maintenance Reporting ..... upset0X@tnrcc.state.tx.us
- FAX ..... See above

Region 7 - Midland

- MAIN LINE 915/570-1359
- FAX 915/570-4795

Regional Director ..... **Jed Barker** 915/570-1359
Administrative Assistant ..... Sylvia Robertson 915/570-1359
Air ..... vacant 915/570-1359
Water/Waste ..... Michael Edmiston 915/570-1359
Upset and Maintenance Reporting ..... upset0X@tnrcc.state.tx.us
- FAX ..... See above

Region 8 - San Angelo

- MAIN LINE 915/655-9479
- FAX 915/658-5431

Regional Director ..... **Ricky Anderson** 915/655-9479
Executive Assistant ..... Rosalinda Rodriguez 915/655-9479
Air/Water/Waste ..... Brent Wade 915/655-9479
Upset and Maintenance Reporting ..... upset0X@tnrcc.state.tx.us
- FAX ..... See above

Region 9 - Waco

- MAIN LINE 254/751-0335
- FAX 254/772-9241

Regional Director ..... **Anna Dunbar** 254/761-3020
Executive Assistant ..... Karen Garbett 254/761-3009

Air	Salal Tahiri	254/761-3008
Water	Kyle Headley	254/761-3007
Waste	Vacant	254/761-3005
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		See above

Region 10 - Beaumont

• MAIN LINE		409/898-3838
• FAX		409/892-2119
Regional Director	**Vic Fair**	409/898-3838
Receptionist	Pamela E. Jones	409/898-3838
Air	Marion Everhart	409/898-3838
Water	Georgiana Volz	409/898-3838
Waste	Keith Anderson	409/898-3838
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		See above

Region 11 - Austin

• MAIN LINE		512/339-2929
• FAX		512/339-3795
Regional Director	**Patty Reeh**	512/339-2929
Receptionist	Jeanette Torres	512/339-2929
Water	Elston Johnson	512/339-2929
Waste/Air	Barry Kalda	512/339-2929
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		See above

Region 12 - Houston

• MAIN LINE		713/767-3500
• FAX (Administration)		713/767-3520
Regional Director	**Leonard H. O. Spearman, Jr.**	713/767-3500
Assistant Regional Director	**Don A. Thompson**	713/767-3500
Administrative Assistant	Zoila Iglesias	713/767-3509
Air	Arturo Blanco	713/767-3715
• FAX		713/767-3761
Water	Donna G. Phillips	713/767-3659
• FAX		713/767-3691
Waste	Marsha Hill	713/767-3610
• FAX		713/767-3646
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		713/767-3799

Region 13 - San Antonio

• MAIN LINE		210/490-3096
• FAX		210/545-4329
Regional Director	**Richard Garcia**	210/490-3096
Executive Assistant	Janet Maitland	210/403-4001
Air	Leo Butler	210/403-4030
Water	Bobby Caldwell	210/403-4020
Waste	Henry Karnei, Jr.	210/403-4010
Watermaster	Albert Segovia	210/403-4040 or 1-800-733-2733
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		210/545-4329

Region 14 - Corpus Christi

• MAIN LINE		361/825-3100
• FAX		361/825-3101
Regional Director	**Buddy Stanley**	361/825-3100
Administrative Assistant	Linda Evans	361/825-3100
Air	Jim Bowman	361/825-3100
Water	Mickey Garza	361/825-3100
Waste	Russell Lewis	361/825-3100
Upset and Maintenance Reporting		upset0X@tnrcc.state.tx.us
• FAX		See above

Region 15 - Harlingen

- MAIN LINE 956/425-6010
- FAX 956/412-5059

Regional Director ..... **Tony Franco** 956/425-6010
Executive Assistant ..... Diana Doñes 956/430-6028
Water ..... Arturo Rodriguez 956/430-6025
Waste/Air ..... Lorinda Gardner 956/430-6023
Watermaster ..... Carlos Rubinstein 956/430-6056
- Fax 956/430-6052

Upset and Maintenance Reporting ..... upset0X@tnrcc.state.tx.us
- FAX 956/412-5059

Region 16 - Laredo

- MAIN LINE 956/791-6611
- FAX 956/791-6716

Regional Director ..... **Gerardo J. Pinzon** 956/791-6611
Administrative Assistant ..... Carmen Ramirez 956/721-8454
Upset and Maintenance Reporting ..... upset0X@tnrcc.state.tx.us
- FAX ..... See above

MONITORING OPERATIONS DIVISION

- MAIN LINE 239-1716
- FAX 239-1605

Director ..... **Steve Spaw** ..... Bldg.B/1 ..... MC 165 239-1700
Executive Assistant ..... Joyce Lane ..... Bldg.B/1 ..... MC 165 239-1043
Administrative Assistant ..... Paul Groves ..... Bldg.B/1 ..... MC 165 239-6761

Ambient Monitoring Section ..... **Roy Hartmann** ..... Bldg.B/1 ..... MC 165 239-1693
Administrative Assistant ..... Noemi Leyva ..... Bldg.B/1 ..... MC 165 239-1806

Monitoring Data Management & Analysis Section ..... **Dave Sullivan** ..... Bldg.B/2 ..... MC 165 239-1623
Administrative Assistant ..... Thelma Thomas ..... Bldg.B/2 ..... MC 165 239-1616

Laboratory & Mobile Monitoring Section ..... **Scott Mgebroff** ..... Bldg.B/2 ..... MC 165 239-1036
Administrative Assistant ..... Barbara Blair ..... Bldg.B/2 ..... MC 165 239-1869
Administrative Assistant ..... Debbie Peters ..... Bldg.B/1 ..... MC 165 239-1677

Houston Laboratory

- FAX 281/457-9107

5144 E. Sam Houston Pkwy N, Houston, TX 77015-3225
Laboratory Director ..... **Jim Busceme** 281/457-5229
Executive Assistant ..... Nancy Porterfield 281/457-5229

ENVIRONMENTAL POLICY, ANALYSIS & ASSESSMENT

- MAIN LINE 239-4900
- FAX ..... 239-4808 / 5687

Deputy Director ..... **Randy Wood** ..... Bldg.F/4 ..... MC 201 239-1120
Executive Assistant ..... Kerry Howard ..... Bldg.F/4 ..... MC 201 239-5855

Administrative Support ..... **John Hawthorne** ..... Bldg.F/4 ..... MC 205 239-0224
- FAX 239-5687

Receptionist ..... Mandy Margeson ..... Bldg.F/4 ..... MC 205 239-4900
Communications Coordinator ..... Forrest Brooks ..... Bldg.F/4 ..... MC 205 239-0578

Border Affairs ..... **Diana Borja** ..... Bldg.F/4 ..... MC 121 239-3600
Administrative Assistant ..... Gloria Lyall ..... Bldg.F/4 ..... MC 121 239-3600
- FAX 239-3515

POLICY & REGULATIONS DIVISION

- MAIN LINE 239-4900
- FAX 239-4808

Director	**Herb Williams**	Bldg.F/4	MC 205	239-4884
Executive Assistant	Cathy Mayes	Bldg.F/4	MC 205	239-3906
Regulation Development Section	**Jeanne Philquist**	Bldg.F/4	MC 205	239-1836
• FAX				239-4808
Project Management Team	Kathy Vail	Bldg.F/4	MC 205	239-6637
Texas Register Team	Lisa Martin	Bldg.F/4	MC 205	239-1966
Policy & Standards Section	**Susan Ferguson**	Bldg.F/4	MC 205	239-2320
• FAX				239-4808

Coastal Bend Bays & Estuaries Program
Texas A & M University - CC, Natural Resources Center, Ste. 3300, 6300 Ocean Dr., Corpus Christi, TX 78412

- FAX 361/825-3437

Program Administrator	**Jeff Foster**	MC 207	361/825-3424

Galveston Bay Estuary Program
711 West Bay Area Boulevard, Ste. 210, Webster, TX 77598

- MAIN LINE 281/332-9937
- FAX 281/332-8590

Program Manager	**Helen Drummond**	MC 208	281/316-3004
Executive Assistant	Judy Fox	MC 208	281/316-3000
Administrative Assistant	Mary Villarreal	MC 208	281/332-3003
Administrative Technician	vacant	MC 208	281/316-3000
Environmental Specialist	vacant	MC 208	281/316-3005
Monitoring & Research	Scott Jones	MC 208	281/316-3007
Natural Resource Uses	Suzunn Rosenberg	MC 208	281/316-3006
Public Participation Coordinator	Marie Nelson	MC 208	281/316-3002
Water Sediment Quality	Jeffrey Dalla Rosa	MC 208	281/316-3001

STRATEGIC ASSESSMENT DIVISION

- MAIN LINE 239-1908
- FAX 239-5687

Director	**Julia Rathgeber**	Bldg.F/4	MC 206	239-3990
Executive Assistant	Janet Dunbar	Bldg.F/4	MC 206	239-1289
Strategic Environmental Analysis Group	**Karen Atkinson**	Bldg.F/4	MC 206	239-4449
Strategic Implementation Plans Section	**Chuck Mueller**	Bldg.F/4	MC 206	239-1916
SIP Development Unit	Bill Jordan	Bldg.F/4	MC 206	239-2583
TMDL Unit	Mel Vargas	Bldg.F/2	MC 150	239-4812
• FAX				239-4114
Waste Planning Unit	Steve Dayton	Bldg.F/4	MC 206	239-6824
• FAX				239-6166

TECHNICAL ANALYSIS DIVISION

- MAIN LINE 239-1459
- FAX 239-1500

Director	**Jim Thomas**	Bldg.E/3	MC 164	239-5724
Program Administrator	Carole Ransom	Bldg.E/3	MC 164	239-1622
Receptionist	'M' Major	Bldg.E/3.	MC 164	239-1459

Area & Mobile Emissions

Assessment Section	**William Gill**	Bldg.E/2	MC 164	239-5750
• FAX				239-1515
Area Source Emissions	Charlie Rubick	Bldg.E/2	MC 164	239-1478
Contracts	Mike Fishburn	Bldg.E/3	MC 164	239-1934
Data Services	Julie Farland	Bldg.E/3	MC 164	239-5705
Mobile Source Emissions	Mary McGarry-Barber	Bldg.E/2	MC 164	239-1987
Rider 13 Near Nonattainment	Darrell Powell	Bldg.E/2	MC 164	239-6121

Air Modeling & Data Analysis Section	**Candy Garrett**	Bldg.E/3	MC 164	239-1885
• FAX				239-1500
Air Modeling	Steve Davis	Bldg.E/3	MC 164	239-1412
Data Analysis	Eric Gribbin	Bldg.E/3	MC 164	239-2590
Industrial Emissions Assessment Section	**Paul Henry**	Bldg.E/3	MC 164	239-1526
• FAX				239-1555
Emissions/Inspection Fees	Darron Blackburn	Bldg.E/3	MC 164	239-1727
Emissions Inventory Helpline				239-1773
Emissions Inventories	Kathy Pendleton	Bldg.E/3	MC 164	239-1936
	David Bailey	Bldg.E/2	MC 164	239-6957
	Kevin Cauble	Bldg.E/2	MC 164	239-1874
	Russ Nettles	Bldg.E/2	MC 164	239-1493
Toxics Release Inventory	Kenneth (Blake) Kidd	Bldg.E/2	MC 164	239-3147
Mobile Source Section	**Hazel Barbour**	Bldg.E/3	MC 164	239-1440
• FAX				239-2050
Fuels and Transportation	Morris Brown	Bldg.E/3	MC 164	239-1438
Inspection and Maintenance	Bobby Wierzowiecki	Bldg.E/3	MC 164	239-1769
Smoking Vehicle Reporting Line				1-800-453-SMOG (7664)
Local Reporting Line				239-1949
Vehicle Registration Denial Hotline				1-888-295-0141
Water Quality Planning & Assessment Section	**Chuck Dvorsky**	Bldg.F/2	MC 147	239-5550
• FAX				239-4450
Watershed Management	Linda Brookins	Bldg.F/2	MC 147	239-4625
Groundwater Planning & Assessment	Steve Musick	Bldg.F/2	MC 147	239-4514

LEGAL SERVICES

• MAIN LINE				239-0600
• FAX				239-0330 / 0606
Deputy Director	**Jim Phillips**	Bldg.A/3	MC 218	239-0615
Executive Assistant/ Communications Coordinator	Jackie Heinemann	Bldg.A/3	MC 218	239-0229
Budget Analyst	Barbara Woodard	Bldg.A/3	MC 218	239-3406
Special Counsel	Lydia González Gromatzky	Bldg.A/3	MC 218	239-0660

ENVIRONMENTAL LAW DIVISION

• MAIN LINE				239-0600
• FAX				239-0606
Director	**Margaret Hoffman**	Bldg.A/3	MC 173	239-0668
Executive Assistant	Cindy McRae	Bldg.A/3	MC 173	239-0651
Receptionist	Jo Ann Huerta	Bldg.A/3	MC 173	239-0600
Senior Attorney/Air	David Duncan	Bldg.A/3	MC 173	239-0465
Senior Attorney/Hazardous Waste	Sharon Smith	Bldg.A/3	MC 173	239-3672
Senior Attorney/MSW & Water Utilities	Irene Montelongo	Bldg.A/3	MC 173	239-0671
Senior Attorney/Remediation	Ramon Dasch	Bldg.A/3	MC 173	239-0476
Senior Attorney/Water Quality/Water Quantity	Marianne Baker	Bldg.A/3	MC 173	239-0475

GENERAL LAW DIVISION

• MAIN LINE				239-0600
• FAX				239-0606
Director	**Kevin McCalla**	Bldg.A/3	MC 173	239-0658
Executive Assistant	Linda Boenig	Bldg.A/3	MC 173	239-0644
Receptionist	Jo Ann Huerta	Bldg.A/3	MC 173	239-0600
Senior Attorney/Contracts	Katharine Marvin	Bldg.A/3	MC 173	239-0452
Senior Attorney/Personnel/Ethics	Elizabeth West	Bldg.A/3	MC 173	239-0748
Manager/Admin./Info. Management	Ronnie Morgan	Bldg.A/3	MC 173	239-1058
Manager/Admin. Support	Phyllis Perkins	Bldg.A/3	MC 173	239-0632

LITIGATION DIVISION

• MAIN LINE				239-3400
• FAX				239-3434
Director	**Paul C. Sarahan**	Bldg.A/3	MC 175	239-3424
Executive Assistant	Eva C. Price	Bldg.A/3	MC 175	239-0641
Receptionist	Jo Ann Huerta	Bldg.A/3	MC 175	239-3400
Senior Attorney	Mary Risner	Bldg.A/3	MC 175	239-6224
Senior Attorney	Lisa Uselton Dyar	Bldg.A/3	MC 175	239-5692
Manager Special Investigations	Barbara Foreman	Bldg.A/3	MC 175	239-3416
Administrative Assistant	Dana Shaw	Bldg.A/3	MC 175	239-3405

PERMITTING, REMEDIATION & REGISTRATION

• MAIN LINE				239-2104
• FAX				239-5151
Deputy Director	**Leigh Ing**	Bldg.D/2	MC 122	239-2104
Executive Assistant	Debbie Reyes	Bldg.D/2	MC 122	239-2104
Office Budget Liaison	Brenda Britt	Bldg.D/2	MC 122	239-2457
Bankruptcy Program	Denise Espinosa	Bldg.D/2	MC 132	239-3812
• FAX				239-0199
Information Technology	Latrice Hertzler	Bldg.F/1	MC 226	239-6703
• FAX				239-1123
Toxicology & Risk Assessment	JoAnn Wiersema	Bldg.B/1	MC 168	239-1782
Administrative Assistant	Rhonda Sing	Bldg.B/1	MC 168	239-1785
Receptionist	Monica Beran	Bldg.B/1	MC 168	239-1795
• FAX				239-1794

AIR PERMITS DIVISION

• MAIN LINE				239-1240
• FAX				239-1300
Director	**John Steib**	Bldg.C/3	MC 163	239-5718
Executive Assistant	Linda Wilkins	Bldg.C/3	MC 163	239-1230
Assistant Division Director	**Dale Beebe-Farrow**	Bldg.C/3	MC 163	239-3443
Admin. Program Support Section	**Dena Woodall**	Bldg.C/2	MC 163	239-1373
Data Management Team	Clarissa Bennett	Bldg.C/2	MC 163	239-2215
Document Processing Team	Brenda O'Brien	Bldg.C/2	MC 163	239-4797
Financial Support Team	vacant	Bldg.C/2	MC 163	
Technical Program Support Section	**Kerry Drake**	Bldg.C/3	MC 163	239-1112
Air Dispersion Modeling Team	Dom Ruggeri	Bldg.C/2	MC 163	239-1508
Emissions Banking/Trading Team	Matt Baker	Bldg.C/2	MC 163	239-1091
Program Design Interface Team	Devin Koele	Bldg.C/3	MC 163	239-1407
Regulatory Initiative Team	Bruce McFarland	Bldg.C/3	MC 163	239-1132
Chemical/Coatings New Source Permits Section	**Tammy Villarreal**	Bldg.C/2	MC 163	239-1283
Chemical Team #1	Harry Pruett	Bldg.C/2	MC 163	239-1312
Chemical Team #2	Kurt Kind	Bldg.C/2	MC 163	239-1337
Coatings Team	Craig Richardson	Bldg.C/2	MC 163	239-1309
Operating Permits Section	**Jesse Chacon**	Bldg.C/3	MC 163	239-1570
Operating Permits Team #1	Javier Maldonado	Bldg.C/3	MC 163	239-6047
Operating Permits Team #2	Tanveer Anjum	Bldg.C/3	MC 163	239-1129
Operating Permits Team #3	Bernard Tupa	Bldg.C/3	MC 163	239-1150
Permit By Rule/General Operating Permits Section	**Duncan Stewart**	Bldg.C/3	MC 163	239-1906
Program Maintenance Team	Hector Garcia	Bldg.C/3	MC 163	239-5760
Permit by Rule Team	Emmanuel Ukandu	Region 12		713/767-3699

Mechanical/Combustion				
Permits Section	**James Randall**	Bldg.C/2	MC 163	239-1249
Agriculture Team	Anna Rodriguez	Bldg.C/2	MC 163	239-1307
Combustion Team	Erik Hendrickson	Bldg.C/2	MC 163	239-1095
Mechanical Team	Richard Hyde	Bldg.C/2	MC 163	239-1319

REGISTRATION, REVIEW & REPORTING (RR&R) DIVISION

• MAIN LINE				239-2106
• FAX				239-2177
• PST Registrations and Reimbursements				239-2001
• Waste Registrations/Reports				239-6832
Director	**Anne Rhyne**	Bldg.D/1	MC 133	239-2106
Executive Assistant	Sonia C. Feliciano	Bldg.D/1	MC 133	239-5902
Administrative Assistant	Theresa Littlejohn	Bldg.D/1	MC 133	239-2255
Budget/H.R. Liaison	Bertha Valderas	Bldg.D/1	MC 133	239-2112
Technical Project & Quality Manager.	Vanessa Schiller	Bldg.F/5	MC 129	239-6874
Central Registry Program	Dorca Zaragoza-Stone	Bldg.D/1	MC 144	239-5175
Permits Administrative Review Section	**Dan Neal**	Bldg.F/1	MC 161	239-2236
Administrative Assistant	Doris K. Poole	Bldg.F/1	MC 161	239-1181
Administrative Assistant	Sandy K. Mohler	Bldg.F/1	MC 161	239-1926
Air & Waste Applications Team	vacant	Bldg.F/1	MC 161	
• FAX				239-4500
Water Quality Applications Team	Janet L. Wyman	Bldg.F/2	MC 148	239-4407
• FAX				239-4430 / 0884
PST Reimb., Tech. Svcs., & Reg. Section	**David Howell**	Bldg.D/1	MC 135	239-5370
Senior Project Manager	Anton Rozsypal	Bldg.D/1	MC 135	239-2187
Administrative Assistant	Lola Woolard	Bldg.D/1	MC 135	239-4478
Administrative Assistant	Deanna Gallegos	Bldg.D/1	MC 135	239-0040
Registration Team	Don Kennedy	Bldg.D/1	MC 138	239-2154
• FAX (Registration only)				239-3399
Reimbursement Team 1	Victor Lombeida	Bldg.D/1	MC 139	239-5713
Reimbursement Team 2	Mike Holder	Bldg.D/1	MC 139	239-2264
• FAX (Reimbursement only)				239-2020
Stage II & Technical Specialists Team	Nathan Weiss	Bldg.D/1	MC 135	239-6718
Stage II Vapor Recovery Hotline				1-800-533-3247
• FAX (UST & Stage II only)				239-1422
Registration & Reporting Section, *Acting*	**Janet Cornelissens**	Bldg.F/5	MC 129	239-6833
Administrative Assistant	Carrie Serrano	Bldg.F/5	MC 129	239-6833
Administrative Assistant	Betty Regan	Bldg.F/5	MC 129	239-6833
Data Mgmt. & Analysis Team 1	Ellette Vinyard	Bldg.F/5	MC 129	239-6832
Data Mgmt. & Analysis Team 2	Janet Cornelissens	Bldg.F/5	MC 129	239-6847
Process Automation Team	Jessica Ogle	Bldg.F/5	MC 129	239-6925
• FAX				239-6410
• FAX (One-time shipment)				239-0786

REMEDIATION (REM) DIVISION

• MAIN LINE				239-4150
• FAX				239-2469
Director	**Jackie Hardee**	Bldg.D/2	MC 225	239-4150
Assistant Director	**David L. Davis**	Bldg.D/2	MC 225	239-2452
Executive Assistant	vacant	Bldg.D/2	MC 225	239-4150
Budget/H.R. Liaison	Janey Saucedo	Bldg.D/2	MC 225	239-4405
Community Relations	Barbara Daywood	Bldg.D/2	MC 225	239-2463
Toll Free Number				1-800-633-9363
Contracting Support Section	**Grace Windbigler**	Bldg.D/1	MC 102	239-2135
Administrative Assistant	vacant	Bldg.D/1	MC 102	239-2147
• FAX				239-2303

Corrective Action Section	**Ata ur Rahman**	Bldg.D/2	MC 127	239-2276
Administrative Assistant	Joy FitzGerald	Bldg.D/2	MC 127	239-2343
Administrative Assistant	Janie Ortegon	Bldg.D/2	MC 127	239-3444
Team I	vacant	Bldg.D/2	MC 127	239-2349
Team II	Cathy Remmert	Bldg.D/2	MC 127	239-2556
Team III	Clint Simmons	Bldg.D/2	MC 127	239-2975
Team IV	Jason Wang	Bldg.D/2	MC 127	239-2242
• FAX				239-2346
PST Responsible Party				
Remediation Section	**Alan Batcheller**	Bldg.D/1	MC 137	239-5782
Administrative Assistant	Helen Coronado	Bldg.D/1	MC 137	239-4199
Team I	vacant	Bldg.D/1	MC 137	239-5814
Team II	Phyllis Cunningham	Bldg.D/1	MC 137	239-5913
Team III	Abhijit Modak	Bldg.D/1	MC 137	239-5811
Team IV	Vicki Montgomery	Bldg.D/1	MC 137	239-5695
• FAX				239-2216
Site Assessment & Management Section	**Glenda Champagne**	Bldg.D/2	MC 142	239-2485
Administrative Assistant	Jill Crist	Bldg.D/2	MC 142	239-2120
Administrative Assistant	Holly Stokes	Bldg.D/1	MC 136	239-2509
PST State Lead Team	David W. Hill	Bldg.D/1	MC 136	239-0115
• FAX				239-2303
Site Discovery & Assessment Team	Wes Newberry	Bldg.D/2	MC 142	239-2512
Natural Resource Trustee Program Team	Richard Seiler	Bldg.D/2	MC 142	239-2523
• FAX				239-4814
Superfund Cleanup Section	**David Hastings**	Bldg.D/2	MC 225	239-2030
Administrative Assistant	Mary Mahaney	Bldg.D/2	MC 143	239-2425
Administrative Assistant	Kara Jensen	Bldg.D/2	MC 143	239-2209
Team I	Wade Stone	Bldg.D/2	MC 143	239-2487
Team II	James Sher	Bldg.D/2	MC 143	239-2444
• FAX				239-2449 / 2450
Technical Support Section	**Chet Clarke**	Bldg.D/2	MC 225	239-2218
Administrative Assistant	Hazel Bonilla	Bldg.D/2	MC 225	239-0310
• FAX				239-2469
Voluntary Cleanup Program	**Chuck Epperson**	Bldg.D/2	MC 221	239-2478
Administrative Assistant	Tammy Svjagintsev	Bldg.D/2	MC 221	239-5894
Administrative Assistant	Gladys Bullock	Bldg.D/2	MC 221	239-3238
Team I	Pat Fontenot	Bldg.D/2	MC 221	239-2132
Team II	Jay Carsten	Bldg.D/2	MC 221	239-5873
• FAX				239-1212

WASTE PERMITS DIVISION

• MAIN LINE				239-2334
• FAX				239-2007
Director	**Dale Burnett**	Bldg.F/5	MC 126	239-6787
Executive Assistant	Barbara Luedecke	Bldg.F/5	MC 126	239-3750
Receptionist	Joanna De Felice-Getz	Bldg.F/5	MC 126	239-2334
Division Support	Brenda Foster	Bldg.F/5	MC 126	239-2325
I&HW Permits Section	**Wade Wheatley**	Bldg.F/5	MC 130	239-6082
Administrative Assistant	Judy Martins	Bldg.F/5	MC 130	239-6595
Combustion Team I	Bill Shafford	Bldg.F/5	MC 130	239-6621
Permits Team II	Katherine Nelson	Bldg.F/5	MC 130	239-6622
Permits Team III	Richard Carmichael	Bldg.F/5	MC 130	239-6629
Permits Team IV	Enoch Johnbull	Bldg.F/5	MC 130	239-6617
Administrative Support Team	Bob Brydson	Bldg.F/5	MC 130	239-6602
Technical Analysis Team	Scott Green	Bldg.F/5	MC 130	239-6381
• FAX				239-6383

MSW Permits Section	**Jerry Allred**	Bldg.F/1	MC 124	239-6784
Administrative Support	Fran Fields	Bldg.F/1	MC 124	239-6706
Permits Team I	Ada Lichaa	Bldg.F/1	MC 124	239-6728
Permits Team II	vacant	Bldg.F/1	MC 124	239-6781
Permits Team III	vacant	Bldg.F/1	MC 124	239-6781
• FAX				239-6000
UIC & Radioactive Waste Section	**Alice Rogers**	Bldg.F/5	MC 131	239-6065
Administrative Support	Jacqie Brown	Bldg.F/5	MC 131	239-6065
UIC Permits Team	Ben Knape	Bldg.F/5	MC 131	239-6633
Licensing Team	George FitzGerald	Bldg.F/5	MC 131	239-6070
Inspections & Compliance Team	Dale Kohler	Bldg.F/5	MC 131	239-6636
• FAX				239-6362
Surface Casing Team	Jack Oswalt	Bldg.A/1	MC 151	239-0522
• FAX				239-1003

WATER PERMITS & RESOURCE MANAGEMENT (WP&RM) DIVISION

• MAIN LINE				239-4300
• FAX (Main/Reception Area)				239-4888
• FAX (Division Director)				239-4114
Director	**Ronald R. Pedde**	Bldg.F/2	MC 145	239-2206
Assistant Division Director	Irene Montelongo	Bldg.F/3	MC 145	239-0671
Special Assistant	Nancy Baier	Bldg.F/3	MC 145	239-3550
Executive Assistant	Kim Kuempel	Bldg.F/2	MC 145	239-4190
Administrative Assistant	Erin White	Bldg.F/2	MC 145	239-4300
Budget Analyst	Carla Vann	Bldg.F/2	MC 145	239-1883
2nd Floor Receptionist	Minnette McCormick-Gee	Bldg.F/2		239-4671
3rd Floor Receptionist	Melissa Machado	Bldg.F/3		239-4691
Public Drinking Water Section, *Acting*	**Jack Schulze**	Bldg.F/3	MC 155	239-6020
• FAX				239-6050
Administrative Assistant	Linda Leatherwood	Bldg.F/3	MC 155	239-6096
Drinking Water Monitoring, *Acting*	Roy Yantis	Bldg.F/3	MC 155	239-6045
Regulatory Planning & Data Quality	Tony Bennett	Bldg.F/3	MC 155	239-6029
Source Water Assessment & Protection, *Acting*	John Meyer	Bldg.F/3	MC 155	239-6199
Surface Plant Evaluation	Jack Schulze	Bldg.F/3	MC 155	239-6046
Surveillance & Technical Assistance	James Pope	Bldg.F/3	MC 155	239-6055
Utilities & Districts Section	**Doug Holcomb**	Bldg.F/3	MC 153	239-6960
• FAX				239-6972
Administrative Assistant	Wanda Morgan	Bldg.F/3	MC 153	239-6964
Rate Analysis & Plan Review	Joe Strouse	Bldg.F/3	MC 153	239-6953
Utility Certification & District Creation	Victoria Harkins	Bldg.F/3	MC 153	239-0353
• FAX				239-6972
District Applications	Rob Cummins	Bldg.F/3	MC 152	239-6158
Utility & District Oversight	Diego Abrego	Bldg.F/3	MC 152	239-6959
• FAX				239-6972
Wastewater Permitting Section	**L'Oreal Stepney**	Bldg.F/2	MC 148	239-4433
• FAX				239-4430
Administrative Assistant	Pat Valdez	Bldg.F/2	MC 148	239-3525
Agriculture	Janet Bauchman	Bldg.F/2	MC 158	239-0341
Industrial Permits	Chris Linendoll	Bldg.F/2	MC 148	239-4515
Municipal Permits	Firoj Vahora	Bldg.F/2	MC 148	239-4540
Pretreatment	Jill Russell	Bldg.F/2	MC 148	239-4564
Storm Water & General Permits	Steve Ligon	Bldg.F/2	MC 148	239-4527
Water Information & Assistance Section	**Barbara Henry**	Bldg.F/2	MC 141	239-4671
• FAX				239-4450
Administrative Assistant	Eria Harvey	Bldg.F/2	MC 141	239-2138

Administrative Assistance	Suzanne Sebek	Bldg.F/2	MC 141	239-6026
Consumer Assistance Hotline				239-6100
Outreach & Information	Kim Grona	Bldg.F/2	MC 141	239-2174
Water Quality Assessment Section	**Donald Love**	Bldg.F/2	MC 150	239-4576
• FAX				239-4420
Administrative Assistant	Bettye Young	Bldg.F/2	MC 150	239-4424
Groundwater Protection, *Acting*	Michael Chadwick	Bldg.F/2	MC 150	239-0996
Water Quality Assessment	Faith Hambleton	Bldg.F/2	MC 150	239-4600
Water Quality Standards	Jim Davenport	Bldg.F/2	MC 150	239-4585
Water Rights Permitting & Availability Section	**Todd Chenoweth**	Bldg.F/3	MC 160	239-4730
• FAX				239-2214
Administrative Assistant	Janet Maldonado	Bldg.F/3	MC 160	239-4047
Conservation & Drought Management, *Acting*	Bill Billingsley	Bldg.F/3	MC 160	239-1697
Instream Uses	Doyle Mosier	Bldg.F/3	MC 160	239-4453
Floodplain Management	James Mirabal	Bldg.F/3	MC 160	239-4771
	Mike Howard	Bldg.F/3	MC 160	239-6155
Surface Water Availability Interstate Compacts	Lann Bookout	Bldg.F/3	MC 160	239-4609
Water Rights Permits	Ted Ground	Bldg.F/3	MC 160	239-3137
Weather Modification	George Bomar	Bldg.F/3	MC 160	239-0770

Austin Offices

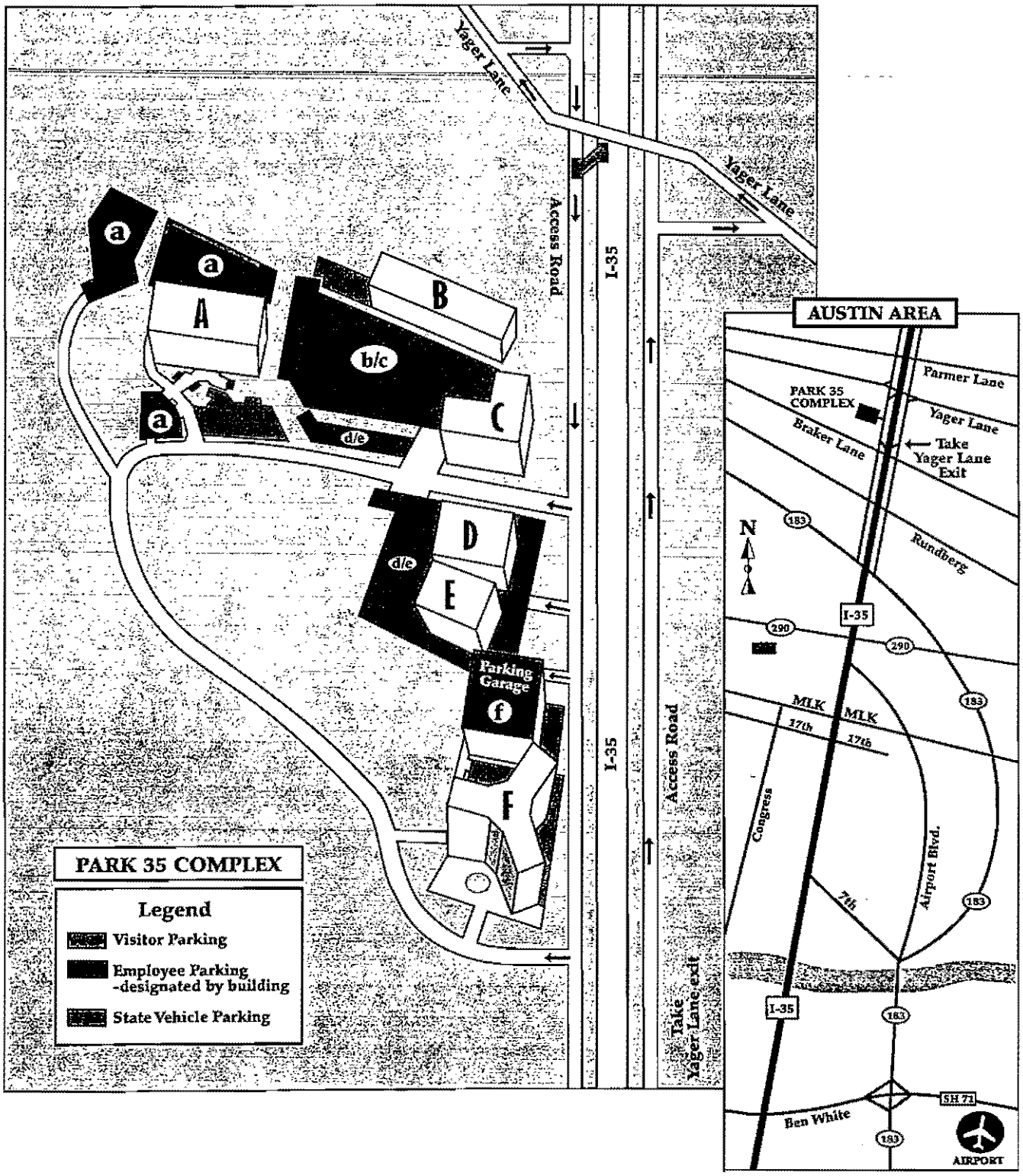
512/239-1000

Mailing Address

P.O. Box 13087
Austin, Texas 78711-3087

Physical Address

12100 Park 35 Circle
Austin, Texas 78753



Regional Offices

Region 1 - Amarillo
806/353-9251

Armstrong	Hemphill
Briscoe	Hutchinson
Carson	Lipscomb
Castro	Moore
Childress	Ochiltree
Collingsworth	Oldham
Dallam	Parmer
Deaf Smith	Potter
Donley	Randall
Gray	Roberts
Hall	Sherman
Hansford	Swisher
Hartley	Wheeler

Region 2 - Lubbock
806/796-7092

Bailey	King
Cochran	Lamb
Crosby	Lubbock
Dickens	Lynn
Floyd	Motley
Garza	Terry
Hale	Yoakum
Hockley	

Region 3 - Abilene
915/698-9674

Archer	Kent
Baylor	Knox
Brown	Mitchell
Callahan	Montague
Clay	Nolan
Coleman	Runnels
Comanche	Scurry
Cottle	Shackelford
Eastland	Stephens
Fisher	Stonewall
Foard	Taylor
Hardeman	Throckmorton
Haskell	Wichita
Jack	Wilbarger
Jones	Young

Region 4 - Arlington
817/588-5800

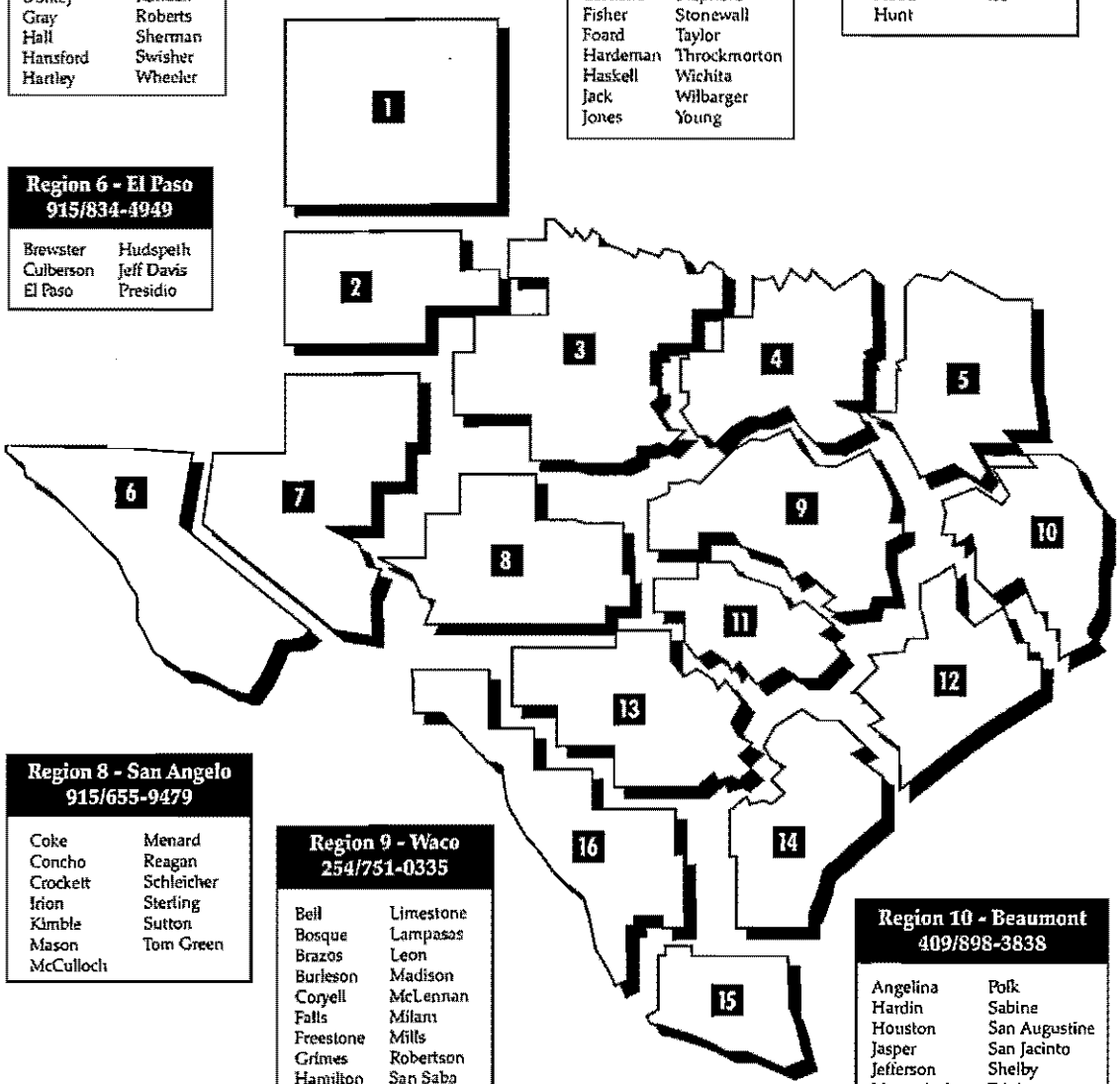
Coltin	Johnson
Cooke	Kaufman
Dallas	Navarro
Denton	Palo Pinto
Ellis	Parker
Erath	Rockwall
Fannin	Somervell
Grayson	Tarrant
Hood	Wise
Hunt	

Region 5 - Tyler
903/535-5100

Anderson	Marion
Bowie	Morris
Camp	Panola
Cherokee	Rains
Cass	Red River
Delta	Rusk
Franklin	Smith
Gregg	Titus
Harrison	Upshur
Henderson	Van Zandt
Hopkins	Wood
Lamar	

Region 6 - El Paso
915/834-4949

Brewster	Hudspeth
Culberson	Jeff Davis
El Paso	Presidio



Region 7 - Midland
915/570-1359

Andrews	Martin
Borden	Midland
Crane	Pecos
Dawson	Reeves
Ector	Terrell
Gaines	Upton
Glasscock	Ward
Howard	Winkler
Loving	

Region 8 - San Angelo
915/655-9479

Coke	Menard
Concho	Reagan
Crockett	Schleicher
Irion	Sterling
Kimble	Sutton
Mason	Tom Green
McCulloch	

Region 9 - Waco
254/751-0335

Bell	Limestone
Bosque	Lampasas
Brazos	Leon
Burleson	Madison
Coryell	McLennan
Falls	Milam
Freestone	Mills
Grimes	Robertson
Hamilton	San Saba
Hill	Washington

Region 10 - Beaumont
409/898-3838

Angelina	Polk
Hardin	Sabine
Houston	San Augustine
Jasper	San Jacinto
Jefferson	Shelby
Nacogdoches	Trinity
Newton	Tyler
Orange	

Region 11 - Austin
512/339-2929

Bastrop	Hays
Blanco	Lee
Burnet	Llano
Caldwell	Travis
Fayette	Williamson

Region 12 - Houston
713/767-3500

Austin	Harris
Brazoria	Liberty
Chambers	Matagorda
Colorado	Montgomery
Fort Bend	Walker
Galveston	Waller
	Wharton

Region 13 - San Antonio
210/490-3096

Atascosa	Karnes
Bandera	Kendall
Bexar	Kerr
Comal	Medina
Edwards	Real
Frio	Uvalde
Gillespie	Wilson
Guadalupe	

Region 14 - Corpus Christi
361/825-3100

Aransas	Kleberg
Bee	Lavaca
Calhoun	Live Oak
De Witt	Nueces
Goliad	Refugio
Gonzales	San Patricio
Jackson	Victoria
Jim Wells	

Region 15 - Harlingen
956/425-6010

Brooks	Kenedy
Cameron	Starr
Hidalgo	Willacy
Jim Hogg	

Region 16 - Laredo
956/791-6611

Dimmit	McMullen
Duval	Val Verde
Kinney	Webb
La Salle	Zapata
Maverick	Zavala

Regional Office Addresses

1 – AMARILLO

Regional Director - Brad Jones
3918 Canyon Dr.
Amarillo, TX 79109-4933
806/353-9251 FAX: 806/358-9545

Perryton Office
511 South Main, Perryton, TX 79070
806/435-8059 FAX: 806/434-8443

2 – LUBBOCK

Regional Director - Jim Estes
4630 50th St., Ste. 600
Lubbock, TX 79414-3520
806/796-7092 FAX: 806/796-7107

3 – ABILENE

Regional Director - Winona Henry
1977 Industrial Blvd.
Abilene, TX 79602-7833
915/698-9674 FAX: 915/692-5869

4 – ARLINGTON

Regional Director - Frank Espino
1101 East Arkansas Lane
Arlington, TX 76010-6499
817/588-5800 FAX: 817/795-2519

Stephenville *(Confined Animal Feeding Operations)*
222 East College, Stephenville, TX 76401
254/965-5624 or 800/687-7078

5 – TYLER

Regional Director - Leroy Biggers
2916 Teague Dr.
Tyler, TX 75701-3756
903/535-5100 FAX: 903/595-1562

6 – EL PASO

Regional Director - Archie Clouse
401 E. Franklin Ave., Ste. 560
El Paso, TX 79901-1206
915/834-4949 FAX: 915/834-4940

7 – MIDLAND

Regional Director - Jed Barker
3300 North A St., Bldg. 4, Ste. 107
Midland, TX 79705-5404
915/570-1359 FAX: 915/570-4795

8 – SAN ANGELO

Regional Director - Ricky Anderson
622 S. Oakes, Ste. K
San Angelo, TX 76903-7013
915/655-9479 FAX: 915/658-5431

9 – WACO

Regional Director - Anna Dunbar
6801 Sanger Ave., Ste. 2500
Waco, TX 76710-7826
254/751-0335 FAX: 254/772-9241

10 – BEAUMONT

Regional Director - Vic Fair
3870 Eastex Fwy.
Beaumont, TX 77703-1892
409/898-3838 FAX: 409/892-2119

11 – AUSTIN

Regional Director - Patty Reeh
1921 Cedar Bend Dr., Ste. 150
Austin, TX 78758-5336
512/339-2929 FAX: 512/339-3795

12 – HOUSTON

Regional Director - Leonard Spearman, Jr.
5425 Polk Ave., Ste. H
Houston, TX 77023-1486
713/767-3500 FAX: 713/767-3520

13 – SAN ANTONIO

Regional Director - Richard Garcia
14250 Judson Rd.
San Antonio, TX 78233-4480
210/490-3096 FAX: 210/545-4329

South Texas Watermaster Office
210/490-3096 FAX: 210/402-0273
1-800/733-2733

14 – CORPUS CHRISTI

Regional Director - Buddy Stanley
6300 Ocean Dr., Ste. 1200
Corpus Christi, TX 78412-5503
361/825-3100 FAX: 361/825-3101

15 – HARLINGEN

Regional Director - Tony Franco
1804 West Jefferson Ave.
Harlingen, TX 78550-5247
956/425-6010 FAX: 956/412-5059

Rio Grande Watermaster Office
956/425-6010 FAX: 956/412-5059

16 – LAREDO

Regional Director - Gerardo J. Pinzon
1403 Seymour, Ste. 2
Laredo, TX 78040-8752
956/791-6611 FAX: 956/791-6716

Eagle Pass Office
1152 Ferry St., Ste. H, Eagle Pass, TX 78852
830/773-5059 FAX: 830/773-4103

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Texas Natural Resource Conservation Commission

P.O. Box 13087
Austin, TX 78711-3087

RETURN SERVICE REQUESTED

cc: Ron Whitehead 3/21

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

Dear Public Water System Official:

We are recognizing public water systems across the state that are doing an outstanding job. In particular, we commend you for your superior level of compliance in routine monthly coliform monitoring. For the last five years, your public water system has had no monitoring violations related to the "Coliform Rule."

We are awarding this certificate in recognition of your superior performance. **Thank you, and keep up the good work.** If you have comments or questions regarding this matter, you may contact me at (512) 239-6020.

Sincerely,

Larry E. Mitchell

Larry E. Mitchell, R.S.
Team Leader
Microbiological Monitoring Team
Public Drinking Water Section

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Public Drinking Water Section of the Water Utilities Division

Presents this

Certificate For Outstanding Performance

to

ADDISON TOWN OF

In the last five years your public water system has had no violations related to the total coliform rule. The staff of the Public Drinking Water Section and the Field Operations Division recognize your outstanding performance and award this certificate.

This certificate is awarded for outstanding performance
during the five year period 1992–1996.

THE STATE OF TEXAS

Sally C. Gutierrez, R.S.

Sally C. Gutierrez, R.S.
Division Director, Water Utilities Division

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

April 30, 1996

John H. Lindner, P.E.
Carter Burgess
7950 Elbrook, Suite 250
Dallas, Texas 75247-4951

Re: Town of Addison, Texas
Midway/Beltline Sanitary Sewer
Texas Natural Resource Conservation Commission Permit No.
WWPR Log No. 046/106
Dallas County

Dear Mr. Lindner:

We have received the design submittal included with your cover letter dated 4/19/1996.

The rules which regulate the design, installation and testing of domestic wastewater projects are found in 30 TAC, Chapter 317, of the TNRCC's rules titled, Design Criteria for Sewerage Systems.

Section 317.1(a)(4)(D), relating to case-by-case reviews, states in part that upon submittal of plans, specifications, and engineering reports (including commission-approved application forms) to the commission, the executive director may approve of the submitted materials without a technical review of the submitted materials.

Under the authority of §317.1(a)(4)(D) a technical review of the submitted materials was not performed. However, **the project proposed in the submittal is approved for construction.** Below are provisions of the Chapter 317 regulations, which must be met as a condition of approval. These items are provided as a reminder. If you have already met these requirements, please disregard this additional notice.

1. You must keep certain materials on file for the life of the project and provide them to TNRCC upon request. These materials include an engineering report, test results, a cover letter, and the final version of the project plans and specifications. These materials shall be prepared and sealed by a Professional Engineer registered in the State of Texas and must show substantial compliance with Chapter 317. All plans and specifications must conform to any waste discharge requirements authorized in a permit by the TNRCC. Certain specific items which shall be addressed in the engineering report are discussed in §317.1(c). Additionally, the engineering report must include all constants, graphs, equations, and calculations needed to show substantial compliance with Chapter 317. The items which shall be included in the cover letter are addressed in §317.1(a)(3).

2. Any deviations from Chapter 317 shall be disclosed in the cover letter and the technical justifications for those deviations shall be provided in the engineering report. Any deviations from Chapter 317 shall be based on the best professional judgement of the registered professional engineer sealing the

materials and the engineer's judgement that the design would not result in a threat to public health or the environment.

3. Any variance from a Chapter 317 requirement disclosed in your cover letter is approved. If in the future, additional variances from the Chapter 317 requirements are desired for the project, each variance must be requested in writing by the design engineer. Then, the TNRCC will consider granting a written approval to the variance from the rules for the specific project and the specific circumstances.

4. Within 60 days of the completion of construction, an appointed engineer shall notify both the Wastewater Permits Section of the TNRCC and the appropriate Region Office of the date of completion. The engineer shall also provide written certification that all construction, materials, and equipment were substantially in accordance with the approved plans and specifications, the rules of the TNRCC, and any change orders filed with the TNRCC. All notifications, certifications, and change orders must include the signed and dated seal of a Professional Engineer registered in the State of Texas.

This approval does not mean that future submittals will be approved without a technical review. The TNRCC will provide a notification of intent to review whenever a submittal is to undergo a review. Please be reminded of §317.1(a)(2) of the rules which states, "Approval given by the executive director...shall not relieve the sewerage system owner or the design engineer of any liabilities or responsibilities with respect to the proper design, construction, or authorized operation of the project in accordance with applicable commission rules."

If you have any questions or if we can be of any further assistance, please call me at (512) 239-4552.

Sincerely,

Louis C. Herrin, III, P.E.
Wastewater Permits Section

cc: Town of Addison, Texas
TNRCC, Region 4 Office

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

September 7, 1994

Mr. John H. Lindner, P.E.
Carter & Burgess, Inc.
7950 Elmbrook, Suite 250
Dallas, TX 75247

Re: Town of Addison
Marsh lane Sewer Interceptor
Proposed Wastewater Collection System Improvements
WWPR Log No. 074/077
TNRCC Permit No. 10303-001
Permittee: Trinity River Authority
Dallas County, Texas

Dear Mr. Lindner:

We have received the design submittal included with your cover letter dated July 26, 1994. This project provides for the construction of the Marsh lane sewer interceptor.

The rules which regulate the design, installation and testing of the proposed project are found in 30 TAC, Section 317.1 and Section 317.2 of Chapter 317 of the TNRCC's rules titled, Design Criteria for Sewerage Systems.

A review to determine whether or not the proposed project complies with the applicable rules in Chapter 317 has not been performed. **However, the proposed project is approved with the following comments and conditions:**

1. An engineering report must be done by the project engineer. This engineering report must include all constants, graphs, equations, and calculations, which are needed to both justify the design and show full compliance with Section 317.1(c) of the TNRCC's rules requiring a final engineering report. Copies of this report shall be made available to the TNRCC, upon request, for a period of two years after the date of the project's completion.

2. The final version of the project plans and specifications shall include any and all information necessary to show full compliance with the applicable requirements detailed in Section 317.1 and Section 317.2 of the TNRCC's rules. Copies of the final version

of the project plans and specifications shall be made available to the TNRCC, upon request, for a period of two years after the date of the project's completion.

3. Any test results necessary to show compliance with the testing requirements of Section 317.2 shall be made available to the TNRCC, upon request, for a period of five years after the date of the project's completion.

4. Although a full review of this proposed project was not performed, please note that the TNRCC still maintains review authority and that this review authority can be utilized at any time in the future, without notification or justification, on a case by case basis. Also, please be aware of Section 317.1(a)(2)(A) of the rules which states, "Approval given by the commission is not intended to relieve the sewerage system owner or the design engineer of any liabilities or responsibilities with respect to the design, construction, or operation of the project."

5. Within 60 days of the completion of construction, an appointed engineer must notify both the Permitting Section of the TNRCC's Watershed Management Division and the appropriate Region Office of the date of completion. The engineer must also provide written certification that all construction, materials and equipment, and test results were substantially in accordance with the approved plans and specifications and any change orders filed with the TNRCC.

If you have any questions or if we can be of any further service, please call James J. Cheng at (512) 239-4558.

Sincerely,

Thomas W. Weber for

Louis C. Herrin III, P.E.
Permitting Section, Watershed Management Division

xc: Town of Addison
Trinity River Authority
TNRCC Region Office 4 (Submitted Materials Attached)

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

COPY

July 21, 1994

Richard Beckert, Mayor
Town of Addison
PO Box 144
Addison, Texas 75001

Subject: Public Drinking Water Supply
Town of Addison (ID# 0570031)
Dallas County, Texas

Dear Mayor Beckert:

On June 29, 1994, our representative, Mr. Paul Littleton, Field Investigator, in company with Keith Thompson, Utilities Superintendent, conducted a sanitary survey of the subject water system. As a result of this survey, your attention is directed to the following items of noncompliance with State Statutes. References after each listed violation are to Title 30, Chapter 290 of the Texas Administrative Code (§290.).

1. The access hole for the water level indicator cable must be reduced so that it is no more than 1/16" larger than the cable size. (§290.43(c)(6))

2. The ground storage tank at the Surveyor Pump Station must be protected by an intruder-resistant fence. The fence must be at least six feet high and constructed of wood, concrete, masonry, or metal with three strands of barbed wire extending outward from the top of the fence at a 45 degree angle. In lieu of the barbed wire, the fence must be eight feet in height. The fence must be in good repair and close enough to surface grade to prevent intruder passage. The fence must have lockable gates which must be kept locked whenever the facility is unattended. (§290.38)

3. All community water systems shall post a legible sign at each of its production, treatment, and storage facilities. The sign must be located in plain view of the public and must provide the name of the water supply and an emergency telephone number where a responsible official can be contacted. (§290.46(w))

4. The "Superior" rating replaces the former "Approved" status which the city has held for many years. A copy of the new sign design is enclosed for your information . This sign should replace the old "State Approved" signs which you now have.

On September 1, 1993, the Texas Water Commission and the Texas Air Control Board merged to form the Texas Natural Resource Conservation Commission (TNRCC). Please address all future correspondence to the Texas Natural Resource Conservation Commission at the above address.

In conclusion, we wish to express our thanks and appreciation for the courtesies extended during the survey.

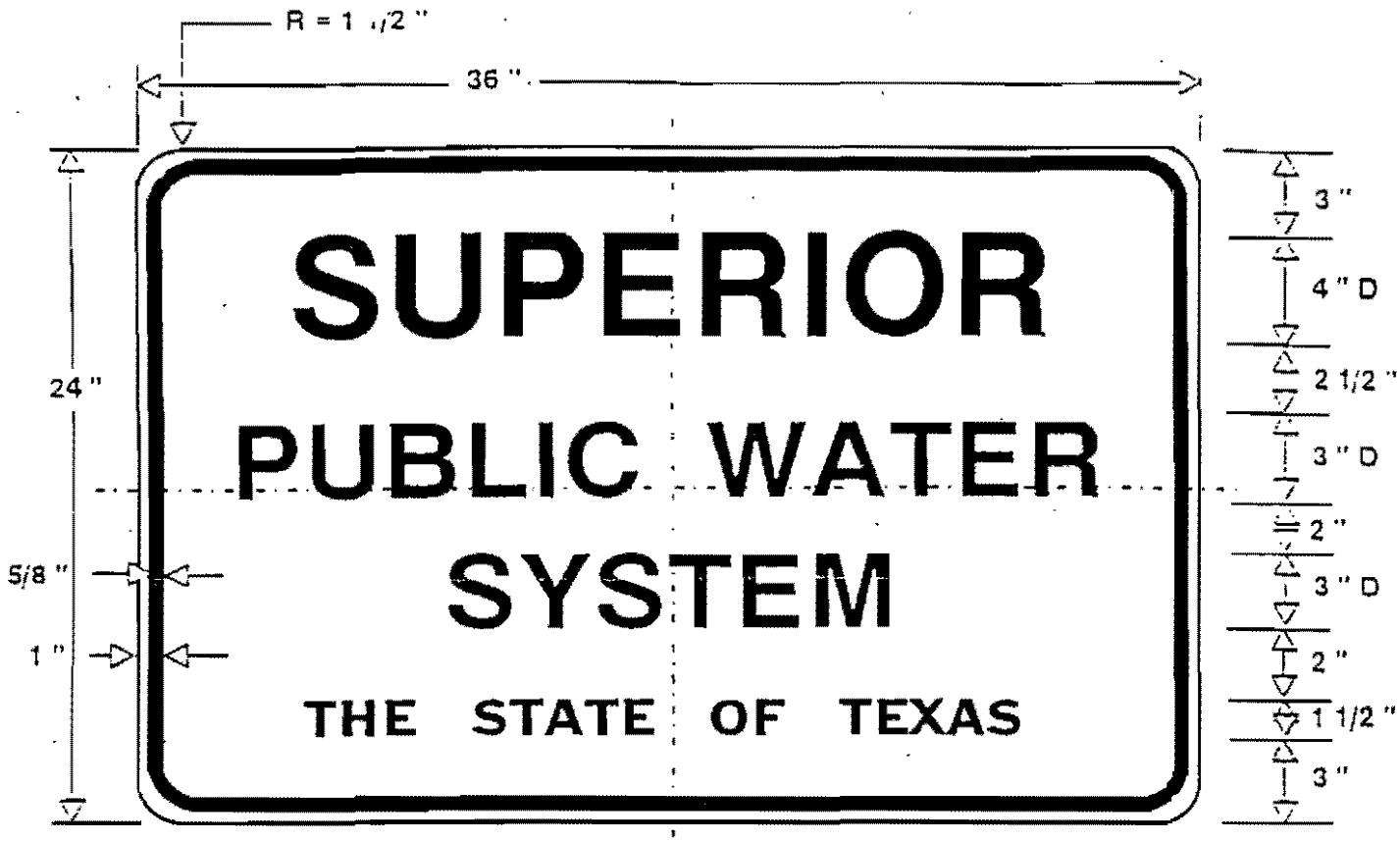
Should clarification of this letter be desired or if we may be of other assistance, please contact our Paul Littleton at our Regional office in Duncanville at 214/283-3703 or the Monitoring and Enforcement Staff in Austin at 512/908-6020.

Sincerely,

Sid Slocum
Manager, Water Program

SS:PHL:phl

cc: Dallas County Health Department
Dallas County Judge
TNRCC - Austin



D-42
36" x 24"

Letters - Black
Border - Black
Background - White

LOCATION

This sign may be erected on all highways entering towns and cities having their public wate supply designated as "Superior" by the Texas Natural Resource Conservation Commission anc when erected, shall be maintained in a first class condition as long as the water syster continues to meet the requirements for this designation. If the town or city fails to maintain it superior rating, the signs shall be removed at once and shall not be replaced until superior statu has been re-established. The sign shall be erected only after the District Engineer of the Texa Department of Transportation or his representative has been consulted as to the location an height of the sign. Usually, the marker will be placed at or inside the limits of the area served b the water system involved and will face incoming traffic.

The sign may be constructed locally according to the Texas Manual on Uniform Traffic Contrc Devices for Streets and Highways or purchased from a manufacturer of standard traffic signs.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

TOWN OF ADDISON

PUBLIC WORKS DEPARTMENT (214) 450-2871

Post Office Box 144 Addison, Texas 75001 16801 Westgrove

July 6, 1994

MEMORANDUM

To: **John Baumgartner**
Director of Public Works

From: **Keith Thompson**
Utilities Foreman

Re: **T.N.R.C.C. Inspection**

On June 29, 1994 Paul Littleton with T.N.R.C.C. performed an inspection on the Addison distribution system and pumping facilities. The result are:

1. Recommendation to change the Town of Addison water supply designation from "Public Water Supply" to "Superior Water Supply".

2. Addison has used its service accounts as a representation of its total service connections. However, T.N.R.C.C. includes apartment units as service connections,(each unit is a connection). This now means Addison has approximately 2,423 service acccounts and 5,322 service connections. The impact of this is:

   a)T.N.R.C.C. fees for distribution system will increase based on this revised number of service connections.

   b) T.N.R.C.C. recommended R.O.F. minimum setting could change based on this revised number of service connections.

Mr. Littleton reviewed Addison's reports and records that are required by T.N.R.C.C. He was satisfied and gave no further recommendations for improvements. After receiving approval we then inspected the elevated tower, Celestial and Surveyor pump stations the results of this inspection are:

1. The elevated tower needs a sign stating "Town of Addison,450-7156" posted on the entry gate.

2. Surveyor pump station needs a sign stating "Town of Addison,450-7156" posted on the entry gate. The existing 6' fence must be barb-wired across the top or extended upward 2 feet. The ground storage transmitter chain holes need to be screened to reduce open area due to rusting. The ground storage overflow screen must be removed.

3. Celestial pump station needs a sign stating "Town of Addison,450-7156" posted on the entry gate. The existing 6' fence must be barb-wired across the top or extended upward 2 feet. The ground storage overflow screens must be removed.

The above recommendations have not been budgeted for which will cause an significant impact on trying to get funding. After the facility inspection, we drove to five locations throughout Addison's distribution system and performed pressure checks and chlorine residual tests. The pressure check and chlorine residual was well over the minimum range (pressure - 43 lbs to 65 lbs, chlorine - 1.9 to 2.2)

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

TITLE 30 TEXAS ADMINISTRATIVE CODE

CHAPTER 317.2

DESIGN CRITERIA FOR SEWERAGE SYSTEMS

Provided By: Texas Concrete Pipe Association
ASCE - Texas Section Spring Meeting
Corpus Christi, Texas
April 21-22, 1994

Sewage Collection System
§317.2

§317.2. Sewage Collection System.

(a) General Requirements.

(1) Design. Sewer lines shall be designed for the estimated future population to be served, plus adequate allowance for institutional and commercial flows. The collection system design shall provide a minimum structural life cycle of 50 years. The collection system design shall provide for the minimization of anaerobic conditions. Design procedures for the minimization of anaerobic conditions outlined in the U.S. Environmental Protection Agency (EPA) Design Manual for Odor and Corrosion Control in Sanitary Sewerage Systems and Treatment Plants (EPA/625/1-85/018), ASCE Manual of Engineering Practice Number 69 (MEP-69) or other appropriate references, should be followed. The owner of the collection system shall provide inspection under the direction of a Texas registered professional engineer during construction and testing phases of the project. The engineer responsible for the design shall also certify to the Executive Director that the project was constructed as approved. All collection systems to be located over the recharge zone of the Edwards Aquifer shall be designed and installed in accordance with 30

TAC Chapter 313 (Edwards Aquifer Rules) in addition to these rules.

(2) Pipe Selection. The choice of sewer pipe shall be based on the chemical characteristics of the water delivered by public and private water suppliers, the character of industrial wastes, the possibilities of septicity, the exclusion of inflow and infiltration, the external forces, internal pressures, abrasion, and corrosion resistance. For all installations, if a pipe as a whole or an integral structural component of the pipe will deteriorate when subjected to corrosive internal conditions, a corrosive resistant coating or liner acceptable to the Commission shall be installed at the pipe manufacturing facility unless the final engineering design report, including calculations and data, submitted by the engineer demonstrates that the design and operational characteristics of the system will maintain the structural integrity of the system during the minimum life cycle. The sewer pipe to be used shall be identified in the plans and technical specifications with its appropriate ASTM, ANSI or AWWA standard numbers for both quality control (dimensions, tolerances, etc.) and installation (bedding, backfill, etc.).

(A) Flexible Pipe. The engineer shall submit an engineering report that includes the method of defining the modulus of soil reaction, (E'), for

the bedding material, (E'_b), and the natural soil (E'_n), or other specific information to quantify the effect of the in-situ material on the effective modulus, (E'_e). The report shall also include design calculations for E'_e, prism load, live loads, long term deflection, strain, bending strain, buckling and wall crushing. The design calculations shall include all information pertinent to the determination of an adequate design including, but not limited to: pipe diameter and material with reference to appropriate standards, modulus of elasticity, tensile strength, pipe stiffness or ring stiffness constant converted to pipe stiffness as described below, Leonhardt's zeta factor or E'_e from another acceptable method, the conversion factor used to obtain vertical deflection when using the Modified Iowa Equation, trench width, depth of cover, water table elevation, etc.

Pipe stiffness shall be related to Ring Stiffness Constant (RSC), when necessary, by the following equation:

$$PS = C \times RSC \times \frac{8.337}{D}$$

PS = Pipe Stiffness, psi;

C = Conversion Factor, (0.80);

RSC = Ring Stiffness Constant; and,

D = Mean Pipe Diameter, in.

In all cases the design procedure, such as outlined above, shall dictate the minimum pipe stiffness whether less than or greater than 46 psi, however, direct bury installations of flexible pipe material may consider a minimum stiffness requirement to ensure ease of handling, transportation and construction. Special consideration shall be given to the pipe stiffness at the expected installation temperature. The resistance of each material to the failure modes of strain, buckling and wall crushing shall be justified to the satisfaction of the Executive Director by the engineer. In all situations, the design methodology shall be consistent with currently accepted design practices and acceptable to the Executive Director. In the design of sanitary sewer systems using trenchless technology, other design methodology may be considered appropriate depending upon the type of pipe selected and other specific conditions.

(B) Rigid Pipe. The engineer shall submit an engineering report that includes the trench width, water table, and depth of cover, etc. For rigid conduits the minimum strengths for the given class

shall be noted in the appropriate standard for the pipe material. For the purpose of this section, rigid pipe is defined as concrete, vitrified clay, or ductile iron pipe.

(C) Other pipe materials may be considered on a case by case basis by the Executive Director. The design and installation of such materials shall generally follow the guidelines for flexible or rigid pipe with appropriate exceptions.

(3) Jointing Material. The materials used and methods to be applied in making joints shall be included in the technical specifications. Materials used for sewer joints shall have a satisfactory record of preventing infiltration and root entrance. Rubber gaskets, PVC compression joints, high compression polyurethane, welded or other types of factory made joints are required.

(4) Testing of Installed Pipe. An infiltration, exfiltration or low-pressure air test shall be specified. Copies of all test results shall be made available to the Executive Director upon request. Tests shall conform to the following requirements:

(A) Infiltration or Exfiltration Tests. The total exfiltration as determined by a hydrostatic head test, shall not exceed 50 gallons per inch diameter per mile of pipe per 24 hours at a

minimum test head of two feet above the crown of the pipe at the upstream manhole. When pipes are installed below the groundwater level an infiltration test shall be used in lieu of the exfiltration test. The total infiltration, as determined by a hydrostatic head test, shall not exceed 50 gallons per inch diameter per mile of pipe per 24 hours at a minimum test head of two feet above the crown of the pipe at the upstream manhole, or at least two feet above existing groundwater level, whichever is greater. For construction within the 25 year flood plain, the infiltration or exfiltration shall not exceed 10 gallons per inch diameter per mile of pipe per 24 hours at the same minimum test head. If the quantity of infiltration or exfiltration exceeds the maximum quantity specified, remedial action shall be undertaken in order to reduce the infiltration or exfiltration to an amount within the limits specified.

(B) Low Pressure Air Test. The procedure for the low pressure air test shall conform to the procedures described in ASTM C-828, ASTM C-924, ASTM F-1417 or other appropriate procedures, except for testing times. The test times shall be as outlined in this section. For sections of pipe

less than 36-inch average inside diameter, the following procedure shall apply unless the pipe is to be joint tested. The pipe shall be pressurized to 3.5 psi greater than the pressure exerted by groundwater above the pipe. Once the pressure is stabilized, the minimum time allowable for the pressure to drop from 3.5 pounds per square inch gauge to 2.5 pounds per square inch gauge shall be computed from the following equation:

$$T = \frac{0.085 \times D \times K}{Q}$$

T = time for pressure to drop 1.0 pound per square inch gauge in seconds

K = 0.000419×D×L, but not less than 1.0

D = average inside pipe diameter in inches

L = length of line of same pipe size being tested, in feet

Q = rate of loss, 0.0015 cubic feet per minute per square foot internal surface shall be used

Since a K value of less than 1.0 shall not be used, there are minimum testing times for each pipe diameter as follows:

Pipe Diameter (inches)	Minimum Time (seconds)	Length for Minimum Time (feet)	Time for Longer Length (seconds)
6	340	398	0.855(L)
8	454	298	1.520(L)
10	567	239	2.374(L)
12	680	199	3.419(L)
15	850	159	5.342(L)
18	1020	133	7.693(L)
21	1190	114	10.471(L)
24	1360	100	13.676(L)
27	1530	88	17.309(L)
30	1700	80	21.369(L)
33	1870	72	25.856(L)

The test may be stopped if no pressure loss has occurred during the first 25% of the calculated testing time. If any pressure loss or leakage has occurred during the first 25% of the testing period, then the test shall continue for the entire test duration as outlined above or until failure. Lines with a 27-inch average inside diameter and larger may be air tested at each joint. Pipe greater than 36 inch diameter must be tested for leakage at each joint. If the joint

test is used, a visual inspection of the joint shall be performed immediately after testing. The pipe is to be pressurized to 3.5 psi greater than the pressure exerted by groundwater above the pipe. Once the pressure has stabilized, the minimum time allowable for the pressure to drop from 3.5 pounds per square inch gauge to 2.5 pounds per square inch gauge shall be 10 seconds.

(C) Deflection Testing. Deflection tests shall be performed on all flexible pipes. For pipelines with inside diameters less than 27 inches, a rigid mandrel shall be used to measure deflection. For pipelines with an inside diameter 27 inches and greater, a method approved by the Executive Director shall be used to test for vertical deflections. Other methods shall provide a precision of ± two tenths of one percent (0.2 %) deflection. The test shall be conducted after the final backfill has been in place at least 30 days. No pipe shall exceed a deflection of five percent. If a pipe should fail to pass the deflection test, the problem shall be corrected and a second test shall be conducted after the final backfill has been in place an additional 30 days. The tests shall be performed without mechanical pulling devices. The design engineer should recognize

that this is a maximum deflection criterion for all pipes and a deflection test less than five percent may be more appropriate for specific types and sizes of pipe. Upon completion of construction, the design engineer or other Texas Registered Professional Engineer appointed by the owner shall certify, to the Executive Director, that the entire installation has passed the deflection test. This certification may be made in conjunction with the notice of completion required in 317.1(e)(1) of this title (relating to General Provisions). This certification shall be provided for the Commission to consider the requirements of the approval to have been met.

(i) Mandrel Sizing. The rigid mandrel shall have an outside diameter (O.D.) equal to 95% of the inside diameter (I.D) of the pipe. The inside diameter of the pipe, for the purpose of determining the outside diameter of the mandrel, shall be the average outside diameter minus two minimum wall thicknesses for O.D. controlled pipe and the average inside diameter for I.D. controlled pipe, all dimensions shall be per appropriate standard. Statistical or other "tolerance packages" shall not be considered in mandrel sizing.

(ii) Mandrel Design. The rigid mandrel shall be constructed of a metal or a rigid plastic material that can withstand 200 psi without being deformed. The mandrel shall have nine or more "runners" or "legs" as long as the total number of legs is an odd number. The barrel section of the mandrel shall have a length of at least 75% of the inside diameter of the pipe. A proving ring shall be provided and used for each size mandrel in use.

(iii) Method Options. Adjustable or flexible mandrels are prohibited. A television inspection is not a substitute for the deflection test. A deflectometer may be approved for use on a case by case basis. Mandrels with removable legs or runners may be accepted on a case by case basis.

(5) Bedding. Trenching, Bedding and Backfill. The width of the trench shall be minimized, but shall be ample to allow the pipe to be laid and jointed properly and to allow the backfill to be placed and compacted as needed. The trench sides shall be kept as nearly vertical as possible. As used herein, a trench shall be defined as that open cut portion of the excavation up to one foot above the pipe. The engineer shall specify the maximum

trench width. The width of the trench shall be sufficient, but no greater than necessary, to ensure working room to properly and safely place and compact haunching materials. The space must be wider than the compaction equipment used in the pipe zone. A minimum clearance of 4 inches below and on each side of all pipes to the trench walls and floor shall be provided. Bedding classes A, B, or C, as described in ASTM C 12 (ANSI A 106.2), Water Environment Federation (WEF) Manual of Practice (MOP) No. 9 or American Society of Civil Engineers (ASCE) MOP 37 shall be used for all rigid pipes, provided that the proper strength pipe is used with the specified bedding to support the anticipated load(s). Embedment classes IA, IB, II or III, as described in ASTM D-2321 (ANSI K65.171) shall be used for all flexible pipes, provided the proper strength pipe is used with the specified bedding to support the anticipated load, except that ASTM D-2680 may be used if the pipe stiffness is 200 psi or greater. Secondary backfill shall be of suitable material removed from excavation except where other material is specified. Debris, large clods or stones greater than 6 inches in diameter, organic matter, or other unstable materials shall not be used for backfill. Backfill shall be placed in such a manner as not to disturb the alignment of the pipe. Where trenching encounters

extensive fracture or fault zones, caves, or solutional modification to the rock strata, construction shall be halted and an engineer shall provide direction to accommodate site conditions. Water line crossings shall be governed by special backfill requirements specified in §317.13 of this title (relating to Appendix E - Separation Distances).

(6) Site Inspections. The Executive Director shall, on a random basis, perform site inspections.

(7) Protecting Public Water Supply. Water lines and sanitary sewers shall be installed no closer to each other than nine feet between outside diameters. Where this cannot be achieved, the sanitary sewer shall be constructed in accordance with §317.13 of this title (relating to Appendix E - Separation Distances) and 30 TAC Section 290.44(e)(1) (relating to the location of water lines). Separation distances between sanitary sewer systems and water wells, springs, surface water sources and water storage facilities shall be installed in accordance with the requirements of 30 TAC Sections 290.41(c)(1), 290.41(d)(1), 290.41(e)(1)(C), 290.41(e)(3)(A), and 290.43(b)(3), as appropriate. Where rules governing separation distance are in conflict, the most strict rule shall apply. No physical connection shall be made between a drinking water supply, public or private, and a sewer or any

appurtenance. An air gap of a minimum of 18" or two pipe diameters, whichever is greater, shall be maintained between all potable water outlets and the maximum water surface elevation of sewer appurtenances. All appurtenances shall be designed and constructed so as to prevent any possibility of sewage entering the potable water system.

(8) Excluding Surface Water. Proposals for the construction of combined sewers will not be approved. Roof, street, or other types of drains which will permit entrance of surface water into the sanitary sewer system shall not be acceptable.

(9) Active Geologic Faults. For systems to be located in areas of known active geologic faults, the design engineer shall locate any faults within the area of the collection system and the system shall be laid out to minimize the number of sewers crossing faults. Where crossings are unavoidable, the engineering report shall specify design features to protect the integrity of the sewer. Consideration should be given to joints providing maximum deflection and to providing manholes on each side of the fault so that a portable pump may be used in the event of sewer failures. Service connections within 50 feet of an active fault should be avoided.

(10) Erosion Control. Erosion or sedimentation control that minimizes the effects of runoff shall be provided during the construction phase of a project. This requirement will be reviewed on a case by case basis.

(b) Capacities.

(1) Sources. The peak flow of domestic sewage, peak flow of waste from industrial plants, and maximum infiltration rates shall be considered in determining the hydraulic capacity of sanitary sewers.

(2) Existing Systems. The design of extensions to sanitary sewers should be based on the data from the existing system. If this is not possible, the design shall be based on data from similar systems or §317.2(b)(3), New systems.

(3) New Systems. New sewers shall be sized using an appropriate engineering analysis of existing and future flow data. The executive director shall have the authority to determine the reliability and appropriateness of the data utilized for sizing the system. In the absence of local reliable flow data and engineering analysis, new sewer systems shall be designed on the basis of an estimated daily sewage flow contribution as shown in the table in §317.4(a) of this title (relating to Wastewater Treatment Facilities). Minor sewers shall be designed such that when flowing full they will transport wastewater at a rate

approximately four times the system design daily average flow. Main trunk, interceptor, and outfall sewers shall be designed to convey the contributed minor sewer flows.

(c) Design Details.

(1) Minimum size. No sewer other than service laterals and force mains shall be less than six inches in diameter.

(2) Slope. All sewers shall be designed and constructed with slopes sufficient to give a velocity when flowing full of not less than 2.0 feet per second. The grades shown in the following table are based on Manning's formula with an assumed "n factor" of 0.013 and constitute minimum acceptable slopes. The minimum acceptable "n" for design and construction shall be 0.013. The "n" used takes into consideration the slime, grit and grease layers that will affect hydraulics or hinder flow as the pipe matures.

Size of Pipe In Inches I.D.	Minimum Slope in percent	Maximum Slope in percent
6	0.50	12.35
8	0.33	8.40
10	0.25	6.23
12	0.20	4.88
15	0.15	3.62
18	0.11	2.83
21	0.09	2.30
24	0.08	1.93

27	0.06	1.65
30	0.055	1.43
33	0.05	1.26
36	0.045	1.12
39	0.04	1.01
>39	*	*

* For lines larger than 39 inches in diameter, the slope may be determined by Manning's formula (as shown below) to maintain a minimum velocity greater than 2.0 feet per second when flowing full and a maximum velocity less than 10 feet per second when flowing full.

$$V=\frac{1.49}{n}\times R_h^{0.67}\times\sqrt{S}$$

V = velocity (ft/sec)

n = Manning's roughness coefficient (0.013)

R_h = hydraulic radius (ft)

S = slope (ft/ft)

(3) High Velocity Protection. Where velocities greater than 10 feet per second will occur when the pipe is flowing full, at slopes greater than those listed above, special provisions shall be made to protect against pipe displacement by erosion of the bedding and/or shock.

(4) Alignment. Sewers shall be laid in straight alignment with uniform grade between manholes unless slight

deviations from straight alignment and uniform grade are justified to the satisfaction of the Executive Director.

(5) Manhole Use. Manholes shall be placed at all points of change in alignment, grade or size of sewer, at the intersection of all sewers and the end of all sewer lines that will be extended at a future date. Any proposal which deviates from this requirement shall be justified to the satisfaction of the Executive Director. Clean-outs with watertight plugs may be installed in lieu of manholes at the end of sewers which are not anticipated to be extended. Such installations must pass a leakage test and a deflection test for all flexible lines.

(A) Type. Manholes shall be monolithic, cast-in-place concrete, fiberglass, precast concrete, HDPE or of equivalent construction. Brick manholes shall not be used, nor shall brick be used to adjust manhole covers to grade.

(B) Spacing. The maximum required manhole spacing for sewers with straight alignment and uniform grades are in the following table. Reduced manhole spacing may be necessary depending on the utility's ability to maintain its sewer lines. Areas subject to flooding require special consideration to minimize inflow.

Pipe Diameter	Maximum Manhole Spacing

(inches)	(feet)
6 - 15	500
18 - 30	800
36 - 48	1000
54 or larger	2000

(C) Inflow and Infiltration Control. Watertight, size-on-size resilient connectors allowing for differential settlement shall be used to connect pipe to manholes. Pipe to manhole connectors shall conform to ASTM C-923. Other types of connectors may be used when approved by the commission. Manholes should not allow surface water to drain into them. If manholes are located within the 100-year flood plain, the manhole covers shall have gaskets and be bolted or have another means of preventing inflow. Where gasketed manhole covers are required for more than three manholes in sequence, an alternate means of venting shall be provided at less than 1,500 foot intervals. Vents should be designed to minimize inflow. Impervious material should be utilized for manhole construction in these areas in order to minimize infiltration.

(D) Manhole Diameter. Manholes shall be of sufficient inside diameters to allow personnel to work within them and to allow proper joining of the sewer

pipes in the manhole wall. The inside diameter of manholes shall be not less than 48 inches.

(E) Manhole Inverts. The bottom of the manhole shall be provided with a "U" shaped channel that is as much as possible a smooth continuation of the inlet and outlet pipes. For manholes connected to pipes less than 15 inches in diameter the channel depth shall be at least half the largest pipe diameter. For manholes connected to pipes 15 to 24 inches in diameter the channel depth shall be at least three fourths the largest pipe diameter. For manholes connected to pipes greater than 24 inches in diameter the channel depth shall be at least equal to the largest pipe diameter. In manholes with pipes of different sizes, the tops of the pipes shall be placed at the same elevation and flow channels in the invert sloped on an even slope from pipe to pipe. The bench provided above the channel shall be sloped at a minimum of 0.5 inch per foot.

Where sewer lines enter the manhole higher than 24 inches above the manhole invert, the invert shall be filleted to prevent solids deposition. A drop pipe should be provided for a sewer entering a manhole more than 30 inches above the invert.

(F) Manhole Covers. Manhole covers of nominal 24 inch or larger diameter are to be used for all sewer manholes.

(G) Manhole Access. Design of features for entering manholes shall be guided by the following criteria:

(i) It is suggested that entrance into manholes in excess of four feet deep be accomplished by means of a portable ladder. Other designs for ingress and egress should be given careful evaluation considering the safety hazards associated with the use of manhole steps under certain conditions.

(ii) Where steps are used, they shall be made of a non-corrosive material and be in accordance with applicable OSHA specifications as published by the U.S. Department of Labor.

(H) Testing. Manholes shall be tested for leakage separately and independently of the wastewater lines by hydrostatic exfiltration testing, vacuum testing, or other methods acceptable to the Commission. If a manhole fails a leakage test, the manhole must be made water tight and retested. The maximum leakage for hydrostatic testing shall be 0.025 gallons per foot diameter per foot of manhole depth per hour. Alternative test methods

must ensure compliance with the above allowable leakage. Hydrostatic exfiltration testing shall be performed as follows: all wastewater lines coming into the manhole shall be sealed with an internal pipe plug, then the manhole shall be filled with water and maintained full for at least one hour. For concrete manholes a wetting period of 24 hours may be used prior to testing in order to allow saturation of the concrete.

(6) Sag Pipes (Inverted Siphons). Sag pipes shall have two or more barrels, a minimum pipe diameter of six inches and shall be provided with necessary appurtenances for convenient flushing and maintenance. The manholes shall have adequate clearances for rodding, and in general, sufficient head shall be provided and pipe sizes selected to assure velocities of at least three feet per second at design flows. The inlet and outlet details shall be arranged so that the normal flow is diverted to one barrel. Provisions shall be made such that either barrel may be taken out of service for cleaning.

(d) Alternative Wastewater Collection Systems. Use of alternative wastewater collection systems may be considered when justified by unusual terrain or geological formations, low population density, difficult construction, or other circumstances where an alternative wastewater collection system would offer an advantage over a conventional gravity

system. An alternative wastewater collection system will be considered for approval only when conditions make a conventional gravity collection system impractical.

Alternative wastewater collection system types include pressure sewers (septic tank effluent pumping or grinder pump systems), small diameter gravity sewers (minimum grade effluent sewers or variable grade effluent sewers), vacuum sewers and combinations thereof. Alternative wastewater collection systems are comprised of both on-site (interceptor tanks, pumps, pump tanks, valves, service laterals) and off-site components (collector mains, force mains, vacuum stations, clean-outs, manholes, vents, and lift stations). Pressure sewer systems, small diameter gravity sewers and vacuum sewers will be approved on a case-by-case basis. The engineering report must justify the design of alternative wastewater collection systems to the satisfaction of the Executive Director. The EPA's "Manual of Alternative Wastewater Collection Systems" (EPA/625/1-91/024), the WEF's Alternative Sewer Systems (MOP FD-12), or other appropriate engineering literature, should be used as the basis for design.

(1) Management. A responsible management structure under the regulatory jurisdiction of the TNRCC shall be established, to the satisfaction of the Executive

Director, to be in charge of the operation and maintenance of an alternative wastewater collection system. A legally binding service agreement shall be required to insure the alternative wastewater collection system is properly constructed and maintained. The required elements of the service agreement are as follows:

(A) The document must be legally binding.

(B) Existing septic and pump tanks that are to be used as interceptor tanks for primary treatment, wastewater storage, or pump tanks prior to the discharge into an alternative sewer system must be cleaned, inspected, repaired, modified or replaced if necessary, to minimize inflow and infiltration into the collection system prior to connection.

(C) The utility shall have approval authority for the design of the system including all materials and equipment prior to the installation of an interceptor tank, pressure sewer pump tank or vacuum system appurtenances. The materials shall comply with standard specifications submitted to and approved by the Executive Director.

(D) The utility must be able to approve the installation of the interceptor tank, pressure sewer pump tank or vacuum system appurtenances

after construction to ensure the installation was as specified.

(E) The utility must be responsible for the operation and maintenance of the system including any interceptor tank, pressure sewer pump tank or vacuum system appurtenances incorporated.

(F) The utility must be able to stop any discharges from any collection system appurtenances in order to prevent contamination of State waters.

(G) The utility shall submit a maintenance schedule to the Executive Director which outlines routine service inspections and maintenance for all types of pressure sewers, small diameter gravity sewers, and vacuum sewer system components.

(H) Pumping units, grinder pumps, vacuum sewer appurtenances, interceptor tanks, shall be regarded as integral components of the system and not as a part of the home plumbing.

(I) Provision to ensure collection system integrity during a power outage (two-year event) shall be incorporated into the design. Power outage duration will be determined as described in subsection 317.3(e)(1).

(2) Pressure Sewer System Design Considerations. The following shall be submitted to and approved by the Executive Director:

(A) Hydraulic calculations for sizing the pressu sewer pumping system shall be based on providin the firm capacity to pump the expected peak flo These calculations shall include system and pur curves as described in subsection 317.3(c)(4), we well capacity calculations based on minimum cyc times as described in subsection 317.3(2)(4)(B) and emergency and flow equalization storage a necessary. The number of units pumping at any o time may be estimated based on appropriat engineering literature;

(B) Flow velocities in the range of three to five fe per second;

(C) The installation of air relief valves;

(D) The provision of means to flush all lines in t system;

(E) The installation of clean-outs; and

(F) Development of procedures whereby portions of t pressure system may be rerouted with tempora lines in the event of leaks, construction, repair.

(3) Pipe Selection. Appropriate ASTM, ANSI or AW standards shall be specified for alternative wastewat collection system pipe and joints. Pipe which will used in pressure sewer systems shall have a minim sustained working pressure rating of 150 pounds p

square inch gauge as per appropriate standard. Pipe selection shall also conform to subsection (a) (1), (2), (3) and (5) of this section.

(4) Leakage Testing. All alternative wastewater collection systems components shall be tested for leakage. Testing procedures for on-site system components, small diameter gravity sewer systems and vacuum sewer systems will be approved on a case-by-case basis. Pressure sewer installation shall be tested for leakage with a hydrostatic test. Copies of all test results shall be made available to the Executive Director upon request. Leakage in the pressure sewer hydrostatic test shall be defined as the quantity of water that must be supplied into the pipe or any valved section thereof, to maintain pressure within 5 pounds per square inch of the specified test pressure after the air in the pipeline has been expelled. The test pressure shall be either a minimum of 25 pounds per square inch gauge or 1.5 times the maximum force main design pressure, whichever is larger. The maximum allowable leakage shall be calculated using the formula below. If the quantity of leakage exceeds the maximum amount calculated, remedial action shall be taken to reduce the leakage to an amount within the allowable limit as follows:

L = leakage in gal/hr

S = length of pipe in ft

(D) Alarms, warning lights, or other suitable indicators of unit malfunction shall be installed at each pumping station.

(E) Whenever any pumping station handles waste from two or more residential housing units or from any public establishment, dual pump units shall be provided to assure continued service in the event of equipment malfunction.

This agency hereby certifies that the proposal has been reviewed by legal counsel and found to be within the agency's authority to adopt.

Issued in Austin, Texas, on September 1, 1993.

Mary Ruth Holder
Director, Legal Division
Texas Natural Resource
Conservation Commission

Texas Natural Resource Conservation Commission

REQUIREMENTS FOR WATER CONSERVATION PLANS FOR MUNICIPAL AND OTHER DRINKING WATER SUPPLY SYSTEMS

Minimum requirements. All water conservation plans for public drinking water supply systems and municipalities shall include the following elements:

1. A utility profile including but not limited to information regarding population and customer data, water use data, water supply system data, and wastewater system data. A utility profile form may be obtained from the Texas Natural Resource Conservation Commission.

2. Specification of conservation goals including but not limited to per capita water use goals, the basis for the development of such goals, and a timeframe for achieving the specified goals.

3. Metering device(s), within an accuracy of plus or minus five percent, in order to measure and account for the amount of water diverted from the source of supply.

4. A program for universal metering of both customer and public uses of water, for meter testing and repair, and for periodic meter replacement.

5. Measures to determine and control unaccounted-for uses of water (e.g., a record management system to record water pumped, water deliveries, water sales and losses; periodic visual inspections along distribution lines; annual or monthly audit of the water system to determine illegal connections, abandoned services, etc.).

6. A program of continuing public education and information regarding water conservation.

7. A water rate structure which is not "promotional", that is, a rate structure which is cost-based and which does not encourage the excessive use of water;

8. A drought management plan including:

   (A) an education and information program concerning the plan;
   (B) notification procedures to identify the initiation and termination of the drought and the corresponding implementation and termination of the drought measures;
   (C) trigger conditions signaling the start of any identified drought period; and
   (D) drought water-use measures (e.g., water use restrictions, etc.) corresponding to each trigger condition.

9. A reservoir systems operations plan, if applicable, providing for the coordinated operation of reservoirs owned by the water manager within a common watershed or river basin in order to optimize available water supplies;

10. Means for implementation and enforcement: A means for implementation and enforcement shall be evidenced by: (A) A copy of the ordinance, resolution, or tariff, indicating official adoption of the water conservation plan by the water supplier; and (B) A description of the authority by which the water supplier will implement and enforce the conservation plan.

continued

Additional requirements. Water conservation plans of drinking water supply systems and municipalities serving a current population of 5000 or more and/or a projected population of 5000 or more within the ten years subsequent to the effective date of the conservation plan shall also include, if applicable, the following conservation strategies.

1. A program of leak detection, repair and water loss accounting for the water transmission, delivery and distribution system in order to control unaccounted-for uses of water.

2. A record management system to record water pumped, water deliveries, water sales and water losses and which allows for the disaggregation of water sales and uses into the following user classes: (a) residential, (b) commercial, (c) public and institutional, and (d) industrial.

3. A requirement in every wholesale water supply contract entered into or renewed after official adoption of the plan, (by either ordinance, resolution or tariff) and including any contract extension, that each successive wholesale customer develop and implement a water conservation plan or water conservation measures using the applicable elements in this chapter; if the customer intends to resell the water, then the contract between the initial supplier and customer must provide that the contract for the resale of the water must have water conservation requirements so that each successive customer in the resale of the water will be required to implement water conservation measures in accordance with applicable provisions of this chapter.

Optional conservation strategies. Any combination of the following strategies should be selected by the water supplier, in addition to the minimum requirements above, if they are necessary in order to achieve the stated water conservation goals of the plan.

1. Conservation-oriented water rates and water rate structures (e.g., uniform or increasing block rate schedules, and/or seasonal rates, but not flat rate or decreasing block rates).

2. Adoption of ordinances, plumbing codes and/or rules requiring water conserving plumbing fixtures to be installed in new structures and existing structures undergoing substantial modification or addition.

3. A program for the replacement or retrofit of water conserving plumbing fixtures in existing structures.

4. Reuse and/or recycling of wastewater and/or greywater.

5. A program for pressure control and/or reduction in the distribution system and/or for customer connections.

6. A program for landscape water management, such as water-conserving landscaping ordinances, landscape water audits, demonstration gardens, exhibits, and educational and training programs.

7. A method for monitoring the effectiveness and efficiency of the water conservation plan.

8. Any other water conservation practice, method or technique which the water supplier shows to be appropriate for achieving the stated goal or goals of the water conservation plan.

cc: JP ✓
JD -
File

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 12, 2002

0570031
CITY OF ADDISON
C/O SCOTT WHEELER - MAYOR
PO BOX 9010
ADDISON, TX 75001

JUL 15 2002
MAYOR/CITY COUNCIL

CC MIKE M.

Subject: Clarification of TNRCC's Requirement that Public Water Systems use ANSI/NSF Standard 60 and 61 Certified Products for Water Treatment and Distribution

Dear Public Water System Official:

It has recently come to the attention of the Texas Natural Resource Conservation Commission (TNRCC) that some Texas public water systems have continued to use treatment chemicals or have installed products in their systems that do not comply with TNRCC requirements contained in Title 30 Texas Administrative Code (30 TAC), Chapter 290, Subchapter D. **All direct additives and newly installed/replacement products used in the production, treatment, storage and distribution of water for human consumption must conform to the American National Standards Institute/National Sanitation Foundation (ANSI/NSF) Standard 60 (direct additives) and 61 (indirect additives), respectively, and be certified by an organization accredited by ANSI.**

If your public water system has not been purchasing ANSI/NSF Standard 60 and 61 certified products, or you are unsure, please reference 30 TAC §§ 290.42(i), 290.43(c)(8), 290.44(a)(1) and 290.44(i)(2)(B). These requirements were first adopted and became effective in 1993. Please note, that these TNRCC adopted requirements include all sections of the ANSI/NSF Standards 60 and 61. Some of the required certified products are treatment chemicals and media, pumps, internal tank coatings, piping, fittings, valves, production and customer meters, and any other product associated with the production, treatment, storage and distribution of water for human consumption.

Under certain conditions, conditional acceptance of materials without ANSI/NSF certification can be granted. A Public Drinking Water (PDW) Program Staff Guidance document outlining these conditions is printed on the back of this letter. This guidance document was last revised on January 1, 1996.

If you have any questions concerning this letter, or if we may be of additional assistance, please contact Mr. James "Red" Weddell at this letterhead's address or by telephone at (512) 239-4798.

Sincerely,

Buck Henderson

E. Buck Henderson, Manager
Public Drinking Water Section (MC 155)
Water Supply Division

EBH/JSW

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

PDW PROGRAM STAFF GUIDANCE

Guidance Title: ANSI/NSF STANDARD 60 AND 61 CERTIFICATION

Rules Affected: 30, TAC, §290.42(I), §290.43(c)(8), §290.44(a)(1) and §290.44(I)(2)(B)

Sections §290.42(I), §290.43(c)(8), §290.44(a)(1) and §290.44(I)(2)(B) in our current *Rules and Regulations for Public Water Systems* concern ANSI/NSF product certification for all direct and indirect additives used in the production, treatment, storage and distribution of public drinking water. All such products must conform to ANSI/NSF Standard 60 for direct additives and ANSI/NSF Standard 61 for indirect additives as of January 1, 1993. Since these requirements went into effect we have been contacted by a number of water system officials and consulting engineers concerning the limited availability of materials which meet these standards. In addition, manufacturers and distributors have informed us of lengthy delays in the certification process. We feel that these concerns are valid and that an interim guidance is necessary until more materials have made their way through the certification proce

- ss. The following guidance has been established:

All materials which come in direct or indirect contact with public drinking water in any stage of treatment must conform to ANSI/NSF Standard 60 for direct additives and ANSI/NSF Standard 61 for indirect additives. Should no certified material for the intended purpose exist or if there are no such certified materials currently marketed in the State of Texas, a material may be conditionally accepted for use if:

1. The material was previously approved by a nationally recognized authority such as EPA, NSF, USDA or USFDA for direct, indirect or incidental contact with water and/or food, and

2. Proof of submission of the material to an organization accredited by ANSI for certification under ANSI/NSF Standards 60 and 61 is provided. Such proof shall consist of either a dated receipt from NSF, UL or other ANSI accredited organization or a letter from the accredited organization acknowledging that the material has been submitted for evaluation and certification.

The conditional acceptance of any single product shall expire when the conditionally accepted product or an alternate competing product receives certification and is marketed within the State of Texas, or the conditionally accepted product is denied certification by an ANSI accredited organization.

END

January 1, 1996
Effective Date

N/A
Expiration Date

Steven E. Walden
Steven E. Walden, R.S., Manager
Public Drinking Water Section
Water Utilities Division

Water Conservation Package

Delivered Contents:

Home Owners:

- 1622 bags on doors
- Cover letter (alarming facts, what the city is doing, ordinances)
- Consumer Confidence Report
- Conservation brochure: Saving Water Inside the Home
- ~~Conservation brochure: Saving~~ Water Outside the Home
- 2 Toilet tablets (1 packet)
- SmartScape CD *

Apartments Individuals:

- Approximately 6,090 bags on doors or left in office or mailed?
- Cover letter (alarming facts, what the city is doing, ordinances)
- Consumer Confidence Report
- Conservation brochure: Saving Water Inside the Home
- 1 Toilet tablet packet

Businesses Including Apartment Complexes:

- 1411 Mailed
- Cover letter (alarming facts, what the city is doing, ordinances)
- Consumer Confidence Report
- SmartScape CD

Need Regular Envelopes too

Need special envelope for the CD's (385) *

1411
— 385
1026 Regular Envelope

Description of each piece:

Cover Letter:

- "Did you know" facts
- What is Addison doing to save water?
- New ordinances
- "Watch for more information on the website"

Consumer Confidence Report:

- Addison drinking water is safe
- Charts showing content
- Water Quality Monitoring Results
- Where does your water come from?
- Special information for people with weakened immune systems
- Letter from Ron

Conservation Brochures:

- Keith getting brochures from Texas Water Development

Toilet Tablets:

- Mike is getting these

SmartScape CD's:

- Slade is getting enough CD's

There are 385 businesses with Irrigation meters