

REASSESSMENT OF TECHNICALLY BASED LOCAL LIMITS

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 (TAC) 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: 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 Texas Pollutant Discharge Elimination System (TPDES) permits. The form supplied allows both the permittee and the Texas Commission on Environmental Quality (TCEQ) **Stormwater & Pretreatment Team** a comparison of the pertinent information utilized in the previous development of local limits to current conditions at the publicly owned treatment works (POTW).

NOTE: FILL OUT A SEPARATE FORM FOR EACH WASTEWATER 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 significant industrial user (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 TBLLs 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 last two years 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 TCEQ Minimum Analytical Levels (MALs). Indicate the effluent limits reported on the Texas Toxicity (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 TCEQ Water Quality Standards Team (MC 150) Water Quality Division.

Item VII- Self Explanatory

Item VIII- Analyses of inorganic pollutants in sludge are covered in 40 CFR 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.

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Items IX to XI - Self explanatory

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).

If you have any questions, please contact your pretreatment representative of the TCEQ's Stormwater & Pretreatment Team (MC 148) Water Quality Division at (512) 239-4671.

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

POTW Name: _____

TPDES Permit No. _____ EPA Identification No. _____

Date of EPA/TCEQ approval of existing TBLLs: _____

Effective date of ordinance(s) 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	
	MGD (measured)	MGD (estimated)	MGD (measured)	MGD (estimated)
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 (check)	Domestic	Other	Domestic	Other

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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 inhibition, upsets, Interference, or Pass Through since the existing TBLLs were implemented?

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

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- 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.

Pollutant	From Influent Analyses		From Approved Previous TBLLs Submittal
	Maximum (lbs/day)	Average (lbs/day)	Maximum headworks allowance (MAHL) (lbs/day)
Arsenic			
Cadmium			
Chromium			
Copper			
Cyanide			
Lead			
Mercury			
Nickel			
Silver			
Zinc			
Molybdenum			
Selenium			
BOD ₅			
TSS			
Ammonia			
Other (specify)			

NOTE: All metals are TOTAL unless otherwise indicated.

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- 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.

Pollutant	From Effluent Analyses		From TexTox Daily Average Effluent Limits	
	Maximum (ug/L)	Average (ug/L)	From Approved Previous TBLLs Submittal (ug/L)	Current (ug/L)
Arsenic				
Cadmium				
Chromium				
Copper				
Cyanide				
Lead				
Mercury				
Nickel				
Silver				
Zinc				
Molybdenum				
Selenium				
BOD ₅				
TSS				
Ammonia				
Other (specify)				

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.

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VIII. Utilizing POTW sludge analyses conducted since the TBLLs were adopted and from current regulations (cite applicable state and/or federal regulation), complete the following and indicate whether results are in total dry weight or TCLP concentration (specify regulation and analytical units in the blank provided):

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

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

NOTE: All metals are TOTAL unless otherwise indicated.

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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 regulated (by symbol)

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 promoted 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:

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**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 of Authorized Signatory

Date

NOTE: This certification should 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.