

Anonymous Anonymous

If revising Chapter 321, please revise Rule §321.52 Application of Subchapter to clarify that the permit by rule only applies if the wastewater is generated solely from meat processing activities. If the meat processing facility commingles wastewater from any other activity, it should be ineligible for authorization by rule. This can be extended to other activities by rule.

I object to the proposed revisions to Chapters 210 and 305 for blanket authorization pertaining to allowable non-stormwater wastestreams listed in the MSGP. That list includes "discharges from emergency firefighting activities" which may be contaminated or contain PFAS or firefighting foam. Such wastewaters cannot be assumed as "benign" and the burden should be on the permittee to demonstrate that it is. Rather than relax every existing wastewater permit in the state by allowing the discharge of wastewaters not authorized in the permit, TCEQ should create a separate general permit for those non-stormwater wastewaters, similar to Louisiana's Short-Term and Emergency Discharge (LAG420000) permit. A new type of general permit would be an appropriate compromise by avoiding the long process of a major amendment to add a waste stream, while still requiring some level of monitoring and sampling to demonstrate how 'benign' the wastewater supposedly is.