

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 1, 2016

ROBERT PUGA PG  
PROJECT NAVIGATOR LTD CUSTODIAL TRUSTEE TEXAS CUST, ASARCO EL PASO  
1 POINTE DR STE 320 STE 320  
BREA, CA 92821

Solid Waste Registration: 31235		
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Re: Compliance with the Waste Reduction Policy Act  
30 TAC §335, Subchapter Q requirements

ROBERT PUGA PG:

You are receiving this letter because we have identified your facility as subject to the Waste Reduction Policy Act (WRPA). WRPA applies to facilities that are large quantity generators (LQG) of hazardous waste, small quantity generators (SQG) of hazardous waste, and/or facilities that are Toxics Release Inventory (TRI) Form R reporters.

Facilities subject to WRPA must prepare a five-year Pollution Prevention (P2) Plan and submit the Executive Summary to the TCEQ. If your facility is a conditionally exempt small quantity generator of hazardous waste and does not report on the TRI Form R, please contact the P2 program to update your status. **If you are registered as an SQG, LQG, and/or report on TRI Form R, you must complete your P2 Plan and you must submit the Executive Summary to the TCEQ by January 1, 2017.**

The following resources can help you prepare your P2 Plan:

- Attend the upcoming TCEQ Pollution Prevention Waste Management Workshop on September 7, 2016. TCEQ staff will provide training to help prevent pollution from hazardous waste and toxic chemicals.

For more information on this workshop, visit the TCEQ Events calendar at:  
<[www.tceq.texas.gov/events](http://www.tceq.texas.gov/events)>

- Attend an upcoming Pollution Prevention and Lean Principles Workshop presented in cooperation with UT-Arlington Zero Waste Network. This year the workshop will be presented in Arlington and Houston.

This highly interactive workshop features Lean techniques and P2 strategies to improve efficiency while decreasing or eliminating pollution.

For more information on the workshop, please visit:  
<[www.ZeroWasteNetwork.org/workshops/](http://www.ZeroWasteNetwork.org/workshops/)>

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- Visit our pollution prevention website at <[www.P2Plan.org](http://www.P2Plan.org)> for tools to help you prepare your P2 Plan.
- Contact P2 Program staff by e-mail at <[p2@tceq.texas.gov](mailto:p2@tceq.texas.gov)> or call 512-239-3143.

Since 1993, our program has helped companies in Texas save more than \$250 million while reducing over 1 million tons of emissions and waste. Additionally, facilities have reported conserving more than 2.7 billion gallons of water and over 555 million kWh of electricity.

Please do not hesitate to contact us if you have questions or need assistance.

Sincerely,

A handwritten signature in cursive script that reads "Susan Palachek".

Susan Palachek, WRPA Program Coordinator  
Texas Commission on Environmental Quality