Pretreatment Standards: Local Limits

[40 CFR §§ 403.5(c) & (d); 122.44(J)(2)(ii)]
Local Limits Address Site Specific Concerns:

- correct existing problems
- prevent potential problems
- protect the receiving waters
- improve sludge disposal options
- protect POTW personnel
Local Limits versus Categorical Standards

- Categorical or National Pretreatment Standards – Process Specific

- Local Limits – Usually – Protective of the POTW, so apply at connection to POTW
Types of Local Limits

- Additional specific prohibitions
- Collection system
- Industrial user management practices plans
- Case-by-case discharge limits
- Chemical specific
Allowable Loading

Versus

Actual Loading
Determine Pollutants of Concern

- Any pollutant which might be reasonably discharged and capable of causing:
  - pass through
  - interference
  - sludge contamination
  - POTW worker health/safety risks
- EPA policy: Cd, Cr, Cu, Pb, Ni, Zn, As, CN⁻, Ag, Hg
Characterize Existing Loadings

- Industrial users/commercial sources
- Hauled waste
- Domestic loadings
- Treatment plant data
Develop MAHLs

- Calculate either the maximum amount (lbs/day) of each toxic pollutant:
  - contributed by an industrial user, or
  - received at the headworks of the WWTP which allows the POTW to achieve total compliance.
Determine MAIL

\[
\text{MAIL} = \text{MAHL} \times (100 - \% \text{ safety factor}) - \text{Domestic/background Loadings}
\]
Allocate MAIL

- Uniform concentration
- Industrial contributory flow
- WYNIWYG
- Mass proportion
- Select industrial reduction
Updating Local Limits

- NPDES Permit Issuance
- Process changes
- Non-compliance
- Additional monitoring data
- Environmental criteria changes
Applying Local Limits

- Adopt local limits into POTW Legal Authority
- Include in individual IU Control Mechanism
- Combination of both
The most stringent limit applies.