

National Pretreatment Program Update

NACWA

2007 National Pretreatment and Pollution Prevention Workshop
Denver, Colorado – NOV 14, 2007

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Topic Outline

- Pretreatment Program Specific Activities
 - Streamlining Implementation Guidance
 - Oversight of SIUs Where EPA/States are Control Authority
 - Performance Measurement Pilot Program
- Industry Sector Guidance & Analytical Methods
 - Biodiesel

Pretreatment Program Specific Activities

Streamlining Implementation Guidance

- ✓ Model Sewer Use Ordinance – Word & pdf
- ✓ Checklist: Pretreatment Program Legal Reviews (for Sewer Use Ordinance) – Word & pdf
- ◆ Introduction to the National Pretreatment Program – *in progress*
- ◆ Control Authority Pretreatment Audit Checklist and Instructions – *in progress*
- ◆ Industrial User Permitting Guidance Manual – *comments received in Sept 2007 and currently being reviewed, addressed and coordinated*

<http://www.epa.gov/npdes/pretreatment>

Pretreatment Program Specific Activities

Streamlining Implementation Fact Sheets

- ✓ Summary of Changes
- ✓ Required Changes
- ✓ Equivalent Mass Limits
- ✓ New Classifications for CIUs
- ✓ Best Management Practices
- ✓ Slug Control Plans
- ◆ Equivalent Concentration Limits – *in final review*

<http://www.epa.gov/npdes/pretreatment>

Pretreatment Program Specific Activities

Streamlining Implementation Fact Sheets

Fact Sheets in development:

- ◆ Equivalent Concentration Limits – *in final review*
- ◆ Sampling / Pollutants not Present – *in review*
- ◆ Equivalent Concentration Limits – *in review*
- ◆ Significant Non-Compliance
- ◆ General Permits

Pretreatment Program Specific Activities

SIU Oversight Where EPA/States are Control Authority

Memorandum from Linda Boornazian (Director, Water Permits Division) to Regional Division Directors, issued May 18, 2007

- In response to September 2004 EPA OIG Pretreatment Program Evaluation
- Reviews requirements of 40 CFR 403.10(f) for approved State Pretreatment Programs, that:
 - “*In the absence of a POTW Pretreatment Program, the State shall have procedures to carry out the activities set forth in §403.8(f)(2)*”
- “403.10(e) States” are *seemingly* un-affected by this memorandum, except that it emphasizes that in the absence of POTW programs, approved State Programs are subject to the same minimum requirements as POTWs

Pretreatment Program Specific Activities

Performance Measurement Pilot Program

- In response to September 2004 EPA OIG Pretreatment Program Evaluation
 - Performance Measures Model
 - Pilot Program

Pretreatment Program Proposed Performance Measures Conceptual Model



Basic							Enhanced		
Performance Measure	Explosions/ Hazardous Atmosphere	pH violations/ Corrosion	Sewer Overflows Associated with Nondomestic Users	Interference or Pass Through	Correct Permits and Representative Sampling	Full Compliance with Local Limits and Categorical Standards	Biosolids Voluntarily Meet Exception'l Quality (Table 3)	CIUs Voluntarily at Zero Discharge	Emerging Pollutant Controls Voluntarily Implemented (dental mercury, etc.)
Regulatory Authority	403.5(b)(1)&(7)	403.5(b)(2)	403.5(b)(3)	403.5(a)(1); 403.5(b)(4), (5), (6); 403.5(c)	403.8(f)(1)(iii) & (v); 403.12	403.6 CWA 1251 Eliminate discharges	503 Regs 403.2	CWA 1251 Eliminate discharges	CWA 1251 Eliminate discharges
Method to Quantify Measure	No. of explosions Instances of hazardous events (incl closed cup test)	No. of pH violations Observed corrosion	No. of spills	No. of instances of interference and pass through	No. of facilities with incorrect permits or unrepresentative sampling	No. of SIUs with no violation of cat'l stds and local limits	No. of facilities at Exception'l Quality	No. of facilities at zero discharge	No. of pollutants & facilities with effective control
	Protect Infrastructure ← Investment → Homeland Security		← Basic Watershed Protection →		← Proactive, High- performance Environmental Protection →		← Enhanced, "beyond compliance" Environmental Performance →		

Industry Sector Guidance

- ◆ National Pretreatment Program Fact Sheet:
“Controlling Fats, Oils, and Grease Discharges from Food Service Establishments” (July 2007)

http://www.epa.gov/npdes/pubs/pretreatment_foodservice_fs.pdf

- ◆ Applicability Guidance regarding Biodiesel and Ethanol wastewater discharges – *end of CY 07?*
- ◆ Update of (December 1996) U.S. EPA NPDES Permit Writers Manual

Industrial Sector Guidance

Other Industry Sector Topics and Activities

- Mercury:
 - March 2007 - *Memorandum on Listing Waters Impaired by Atmospheric Mercury Under Clean Water Act Section 303(d): Voluntary Subcategory 5m* (140 KB; 20 pg)
<http://www.epa.gov/owow/tmdl/mercury5m/>
- Prions - Inter-Agency groups (USDA, USFDA, EPA, etc.)
 - Fate and Transport of Chronic Wasting Disease Prions in a Landfill Environment Study – Univ. of Wisconsin ~ June 2007
http://www.epa.gov/future_of_science/promote/cwd.html
- Antimicrobials – multiple EPA groups, inter-Agency groups
 - 40 CFR 158 (promulgated 1984) and 161

More Information

Pretreatment Program

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Biodiesel and Ethanol Permit Information

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