

Pretreatment Performance Measures Roundtable

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What is Performance Measurement?

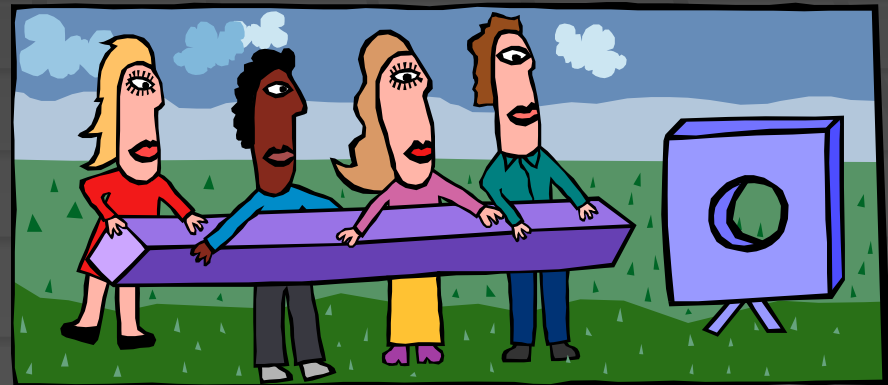
- **A method to quantify success of a program or project in achieving its goals**
- Not simply concerned with collecting data, but also concerned with:
 - Prevention and detection aimed at achieving conformance of the work product or service to your customer's requirements.
 - Process optimization through increased efficiency and effectiveness of the process or product.
 - Actions that occur in a continuous cycle, allowing options for expansion and improvement of the work process or product
 - Incorporating innovation, improved techniques as they are discovered and implemented

Why is EPA Concerned with Performance Measures?

- EPA Office of the Inspector General Report 2004-P-00030, September 2004: **“EPA Needs to Reinforce Its National Pretreatment Program”**:
 - EPA needs to develop results-based measures
 - To support continued funding
 - To identify future needs

“Results-Based”?

- Need to link to Environmental Quality Benefits: “Clean and Safe Water”
- Previous EPA Pretreatment Performance Measures were:
 - Activity-Based
 - Compliance-Based



EPA Methodology

- Review past reports / evaluations:
 - July 1994 EPA Grant-funded, AMSA Report “Performance Measurement and National Industrial Wastewater Pretreatment Program”
 - 2001 Office of Policy, Analysis, and Accountability memorandum on pretreatment performance metrics
 - EPA Office of the Inspector General Report 2004-P-00030, September 2004: “Effectiveness of Effluent Guidelines Program for Reducing Pollutant Discharges Uncertain”
- **Review Program Anew**

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		

Where is EPA in its Process?

EPA's Interim Measure:
Environmental Education Manual



Purpose:

- Educate resource managers on Pretreatment Program's environmental links / benefits
- Support pretreatment professional with self-assistance tool to improve communications with resource managers

Opportunities to Provide Input?

Providing Input for Handbook

- State Workgroup
- NACWA Workgroup

What about the Measures?

- In the [far] future:
Public comment period w/i GPRA
(5-year planning process)

