

Pretreatment Training Course

National Association of Clean Water Agencies
(NACWA)

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History

- 1899 Rivers and Harbors Act
- 1956 Federal Water Pollution Control Act
- 1965 Water Quality Act
- 1972 FWPCA Amendments create NPDES Program
- 1977 Clean Water Act
- 1987 Water Quality Act
- ? Clean Water Act Reauthorization
- 1970 EPA established through an executive order

Statutes (Laws) vs. Regulations

- Legislature – Legislation or Act passed then signed (governor/president)
 - Directs agency to take action
- Federal/State Register notice of action
- Regulations into effect
- Appropriate Entities act out provisions
 - Policy and guidance

Federal Law

Clean Water Act

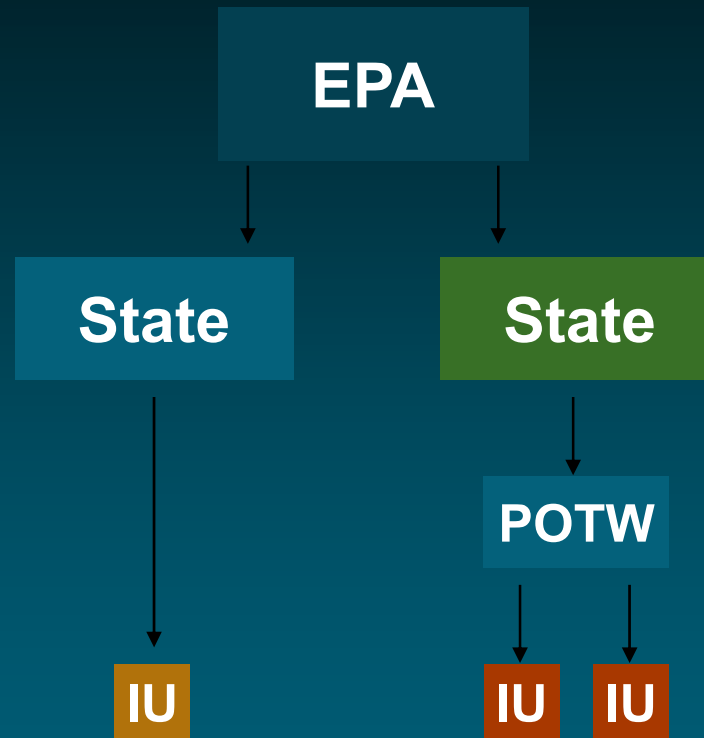
[33 U.S.C. 1251, et seq.]

101, 212, 301, 307, 308, 309, 402,
502

Roles and Responsibilities

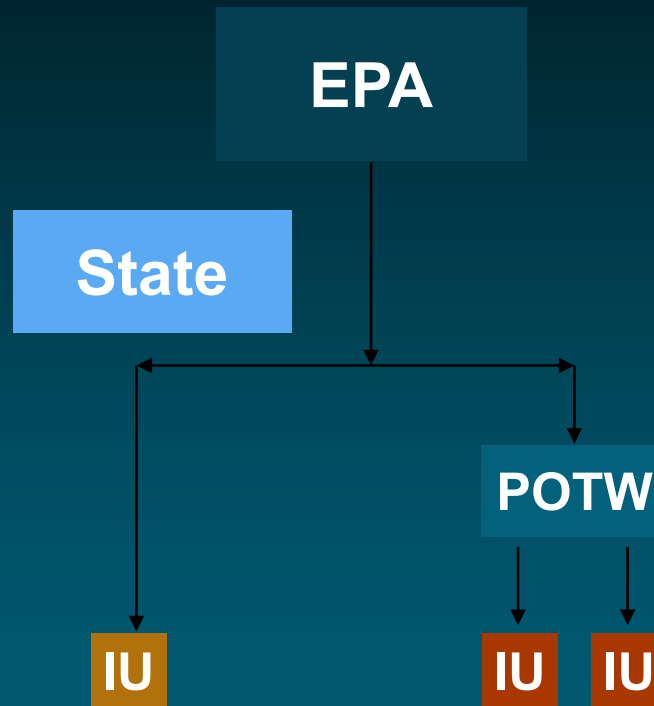
EPA or the State
Approval Authority
or
Control Authority

Authorized States



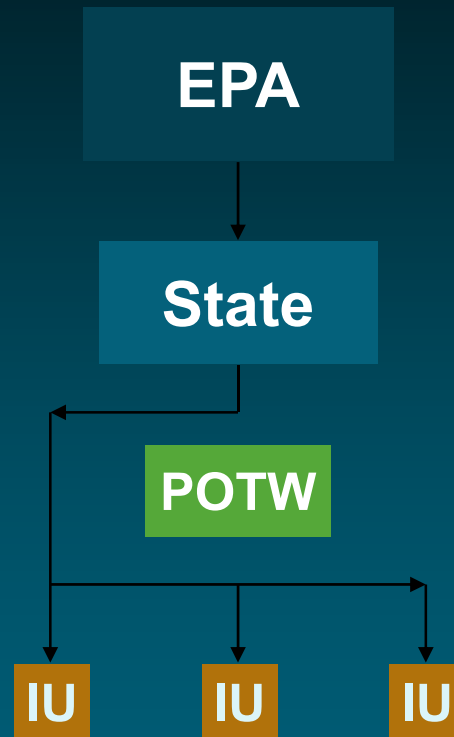
- - Approval & Control Authority
- - Industrial User in approved program
- - Approval Authority
- - Control Authority
- - Industrial User

Non-Authorized States



- - Approval & Control Authority
- - Industrial User in approved program
- - Control Authority
- - Industrial User
- - Non-Delegated States

40 CFR § 403.10(e), States



■ - Approval Authority

■ - Industrial User

■ - Control Authority

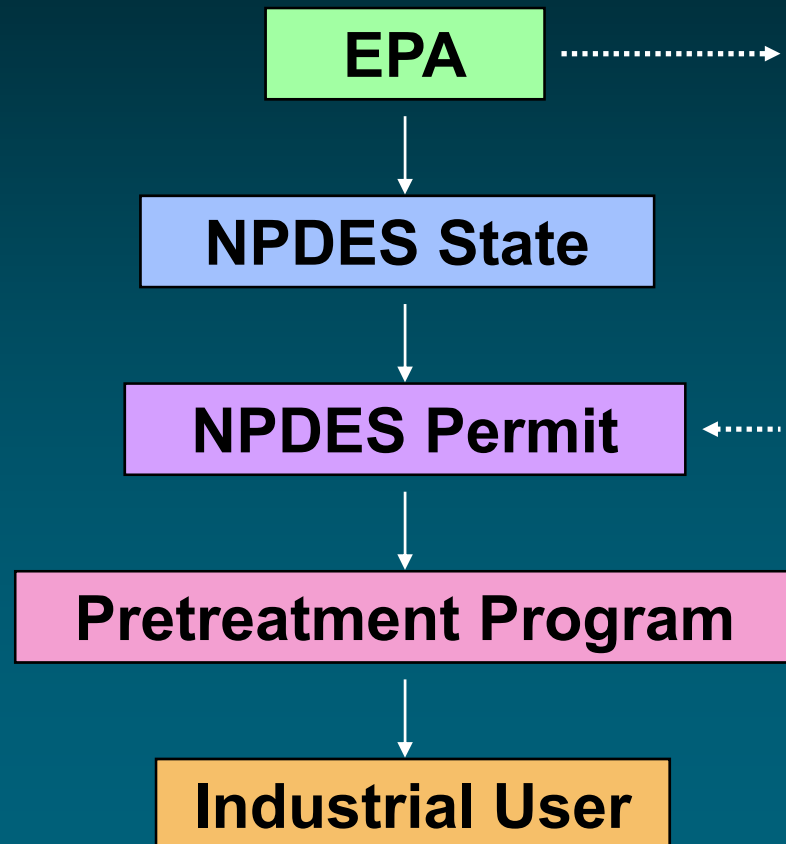
■ - No Pretreatment Program

National Pollutant Discharge Elimination System(“NPDES”)

[40 CFR Part 122]

- NPDES applies to all “point sources discharging pollutants” into “waters of the United States”
- point sources must obtain an NPDES permit from EPA or their delegated State
- NPDES permits require development of Pretreatment Programs

The connection: 40 CFR Part 122



Pretreatment Regulations - History

1973 - 40 CFR Part 128 promulgated

1978 - 40 CFR Part 403 promulgated

1983 - POTW program approval deadline

1985 - Pretreatment Implementation Review Task Force (“PIRT”) report released

1986 - Domestic Sewage Study (DSS) Report to Congress

1988 - PIRT Rules promulgated

1990 - DSS regulations promulgated

1993 - Removal credit/pollutant eligibility revised

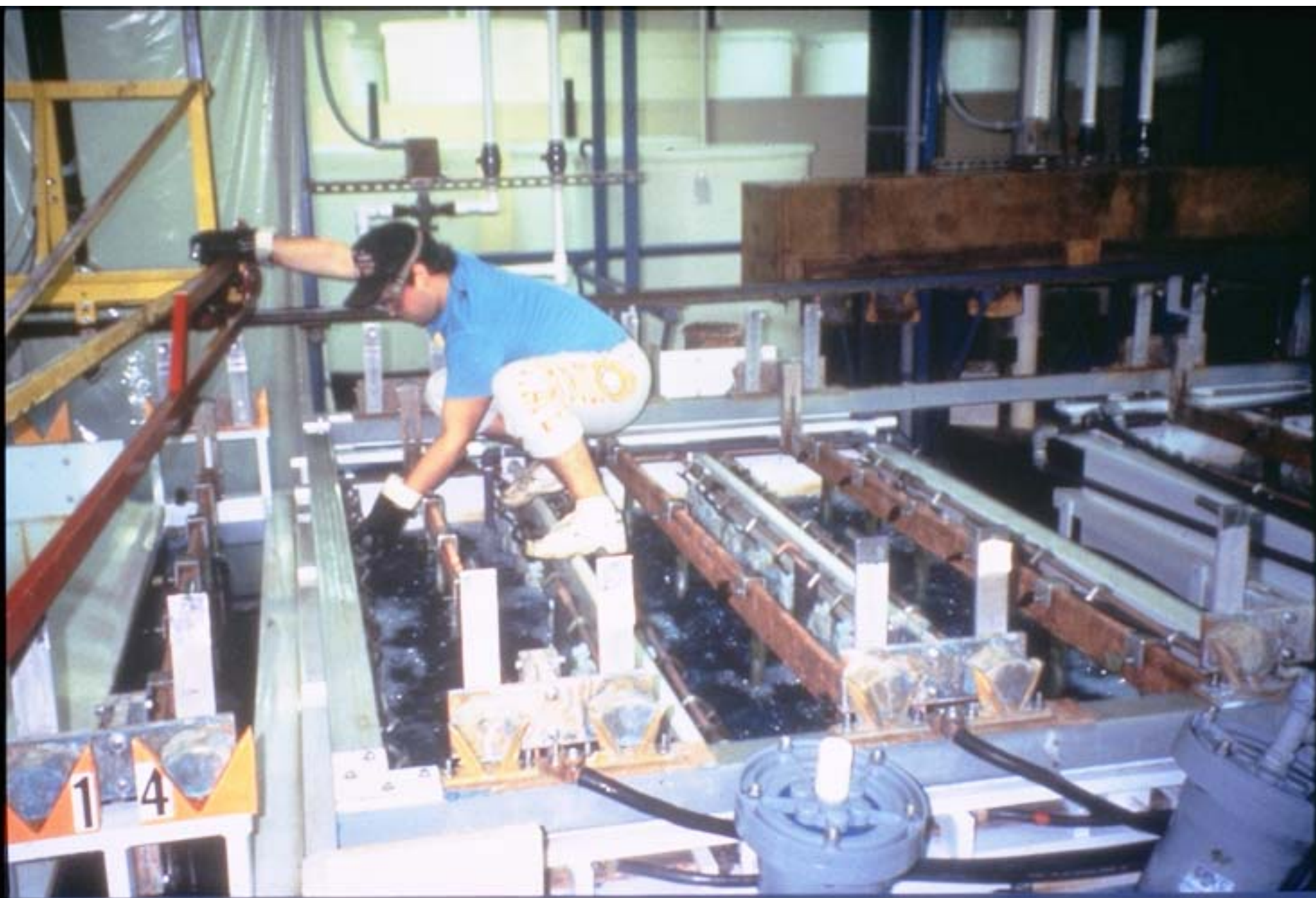
2005 - Streamlining

40 CFR Part 403

- U.S. Code of Federal Regulations(CFR)
 - Title 40 - Protection of the Environment
 - Chapter I - Environmental Protection Agency
 - Subchapter N - Effluent Guidelines and Standards
 - Part 403 - General Pretreatment Regulations for Existing and New Sources of Pollution

40 CFR Part 403 Objectives

- (a) To prevent the introduction of pollutants into POTWs which will interfere with the operation of a POTW, including interference with its use or disposal of municipal sludge;
 - (b) To prevent the introduction of pollutants into POTWs which will pass through the treatment works or otherwise be incompatible with such works; and
 - (c) To improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges.
- To protect POTW workers.







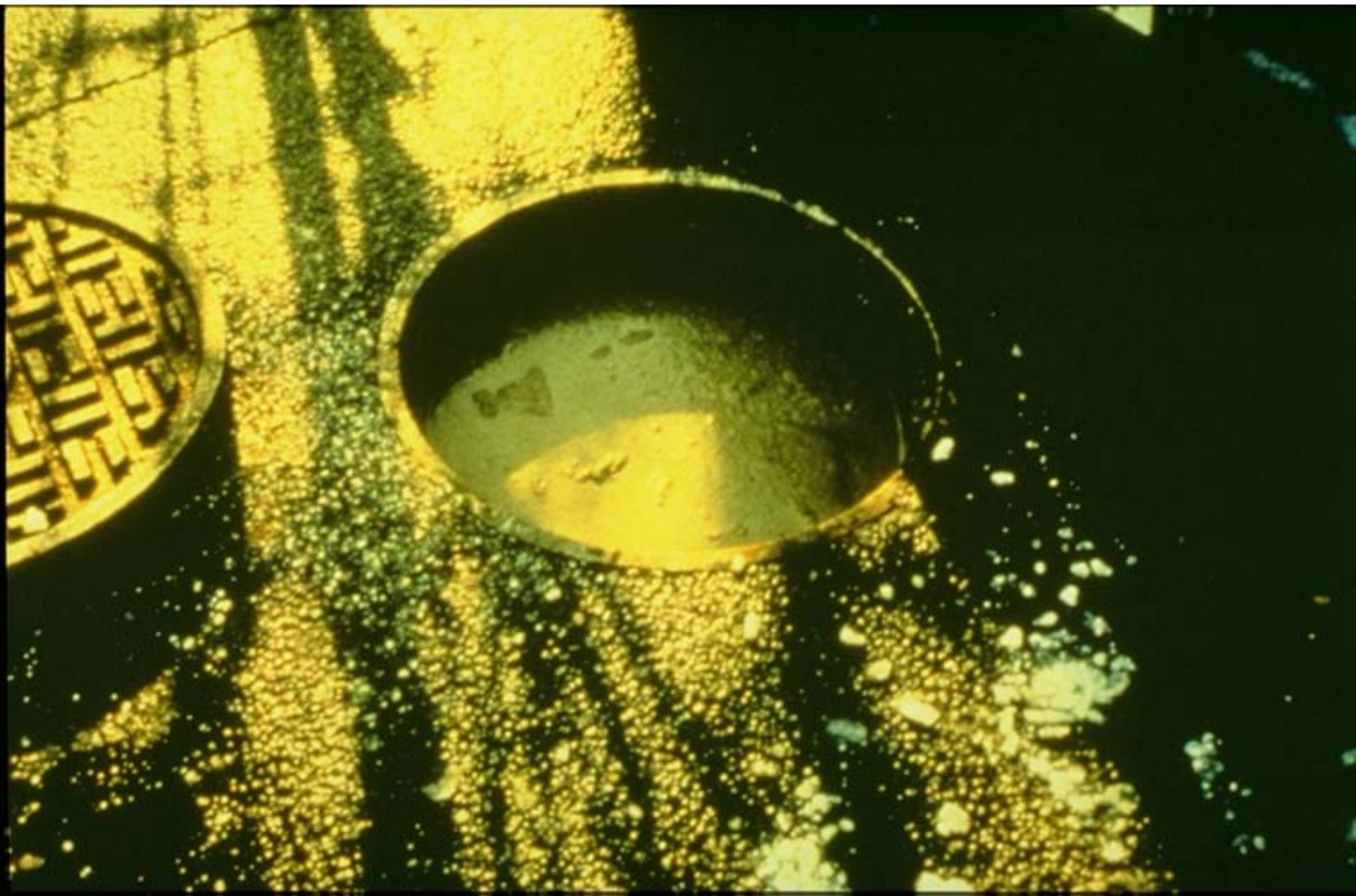












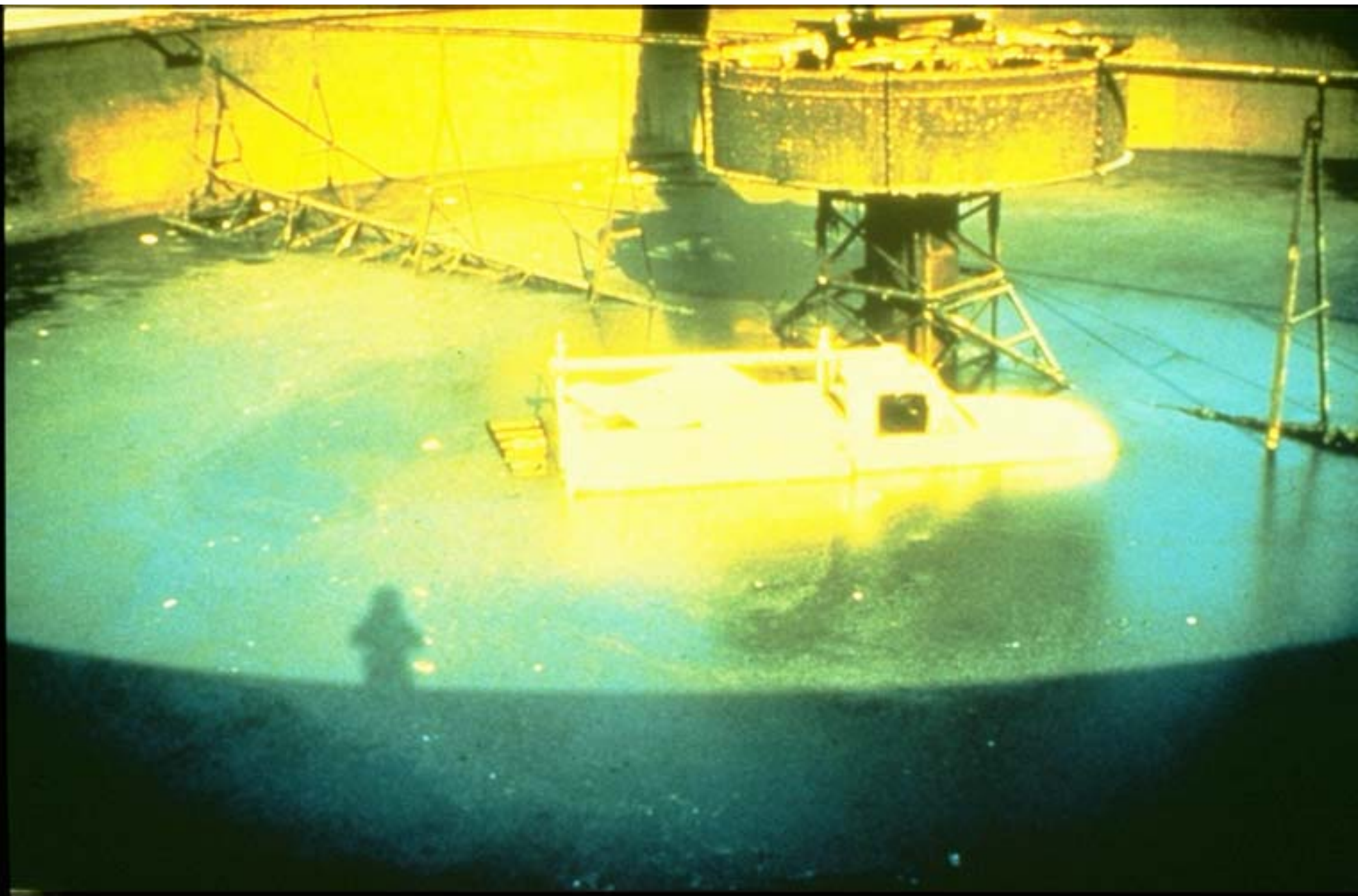


















Who Must Develop a Program?

- POTWs with:
 - combined design flow > 5 MGD, and
 - receiving flow from CIUs, and/or
 - receiving pollutants which pass through or interfere.
- Approval Authority may require program be developed, regardless.
- NPDES State's may assume responsibility. (See 40 CFR 403.10(e))