



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 WWTPwhich allows the POTW to achieve total compliance.

Determine MAIL

$$\frac{\text{MAHL} * (100 - \% \text{ safety factor}) - \text{Domestic/background Loadings}}{= \text{MAIL}}$$



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.**