



I. Industrial Pretreatment Program Basics

- A. A water pollution control program to prevent:
 1. Interference
 2. Pass through
 3. Contamination of biosolids
 4. Damage to the collection system
 5. Protect worker health and safety
- B. IPP Regulations
 1. Part 403 of Title 40 of the Code of Federal Regulations (40 CFR Part 403)
 2. Categorical Pretreatment Standards
 3. Rule 323.23 of the Michigan Administrative Code (Part 23 Rules)
 4. Local Sewer Use Ordinance (SUO)
- C. Categorical Pretreatment Standards
 1. Title 40 of the Code of Federal Regulations, Parts 405 – 471
 2. Currently 56 Categories published
 3. Standards and guidance materials available from EPA on line
 4. New Standards under development
 - a. Airport Deicing,
 - b. Steam Electric Power Generation
 - c. Health Care Sector
 5. www.epa.gov/waterscience/guide/industry.html

II. What to expect from your Local IPP

- A. A Sewer Use Ordinance (SUO)
 1. Establishes legal authority for the municipality to:
 - a. Issue permits
 - b. Set discharge limits
 - c. Conduct inspections and monitoring
 - d. Enforce the IPP
 2. Local Limits
 3. Approved by the DNRE
- B. Wastewater Discharge Permit
 1. Discharge Authorization
 2. Effluent limits
 3. Monitoring and Reporting requirements
 - a. Test methods - 40 CFR 136
 - b. Sample type and location
 4. Best Management Practices (BMP's)
 5. Notification requirements
 6. Records retention requirements
- C. Self-Monitoring and Reporting
 1. Frequency
 2. Sample location
 3. Sample type
 4. Must be representative

- D. 40 CFR 136 Approved test methods
- E. Reporting
 - 1. At least twice each year
 - 2. Signed and Certified
- F. Monitoring by POTW
 - 1. At least once per year
 - 2. All regulated pollutants
- G. Inspections
 - 1. Process areas where wastewater is generated
 - 2. Chemical storage areas
 - 3. Pretreatment system
 - 4. Monitoring location
 - 5. Records review
- H. Compliance Assistance
 - 1. POTW IPP staff
 - a. Local requirements
 - b. EPA and DNRE requirements
 - c. Treatment systems
 - d. Pollution prevention
 - 2. DEQ and EPA staff
 - a. State and federal regulations
 - b. Categorical standards
- I. Enforcement
 - 1. Violations
 - a. Discharge limits
 - b. Late reports
 - c. Compliance schedules
 - d. Other IPP requirements
 - 2. Enforcement tools:
 - a. Phone call / e-mail
 - b. Notice of Violation
 - c. Administrative Consent Order/Agreement
 - d. Fines
 - e. Termination of service
- J. Protection of the Local Environment
 - 1. Water quality
 - 2. Beneficial reuse of biosolids
 - 3. Prevent and respond to pollution emergencies
- K. Fair Treatment
 - 1. Categorical standards
 - 2. Local Limits
 - 3. Procedures
 - 4. Enforcement Response Plan

III. Discharge Restrictions

- A. The following discharges are prohibited to any sanitary sewer anywhere:
 - 1. Pollutants which cause pass through or interfere with the operation of the WWTP;
 - 2. Pollutants which create a fire or explosion hazard;
 - 3. Pollutants which will cause corrosive structural damage to the POTW and in no case discharges with a pH < 5 SU (unless the collection system is specifically designed to handle a lower pH);
 - 4. Solid or viscous pollutants in amounts which will cause an obstruction in the sewer;
 - 5. Heat in excess of 140 Degrees Fahrenheit (at the headworks);
 - 6. Oil in amounts that will cause interference or pass through;

7. Pollutants which result in the presence of toxic gases or fumes in a quantity that may cause acute worker health and safety problems; and,
 8. Any trucked or hauled waste except at discharge points designated by the POTW.
- B. Local Limits
1. Developed by each POTW
 2. POTW specific
 3. Published in SUO
- C. Why are Local Limits different in each municipality?
1. Size of the WWTP
 2. Treatment technology
 3. Receiving stream
 - a. Size
 - b. Designated uses
 - c. Other discharges to the same reach
 4. Number & types of industry
 5. Ratio of domestic to nondomestic users
- D. WWTPs have limited capacities for treating pollutants
1. WWTPs treat incoming wastewater from all sources - domestic, commercial and industrial
 2. The pollutants contributed by these sources vary
 3. No two municipalities are exactly alike
- E. A Simple Example
1. WWTP can treat 100 pounds per day of phosphorus.
 2. Domestic loading = 40 pounds per day
 3. Available Industrial loading = 60 pounds per day
 4. 1 industry can discharge up to 60 Lbs/day
 5. Multiple industries must share the available loading
- F. Capacity Allocation
1. Local policy decision
 2. Allocations can be uniform (everyone gets the same concentration or mass limit)
 3. Or non-uniform (everyone gets their own individual limits)
 4. Allocations (“local limits”) in local sewer use ordinance

IV. Regulatory update

- A. Pretreatment Streamlining Rules”
1. Published October 14, 2005
 2. Effective November 14, 2005
 3. Reduce the burden on municipalities and industries
 4. More restrictive changes must be implemented
 5. Less restrictive changes cannot be implemented in Michigan until State rules are changed
- B. Flow Proportional Composite Sampling
1. If your facility discharges to a POPTW with design flow > 5 MGD (FIPP) or you have a categorical discharger to a POTW with design flow \leq 5 MGD (MIPP):
 - a. You must collect flow-proportional composite samples
 - or**
 - b. Demonstrate that time-proportional composite sampling or grab samples are representative
 - and**
 - c. Have authorization from the IPP Control Authority to conduct grab or/and time proportional composite samples
 2. If you have a non-categorical discharge to a POTW with design flow \leq 5MGD (MIPP):
 - a. Sampling must be representative of the discharge
 - b. Stay tuned for further developments.

- C. Electronic Reporting Rule
 - 1. Will require electronic submittal of all NPDES reporting
 - 2. IPP – data from municipalities and all SIUs
 - 3. Published in Federal Register 7/30/13
 - 4. Comments due 10/28/13
 - 5. <http://www2.epa.gov/compliance/proposed-npdes-electronic-reporting-rule>
- D. Effluent Guidelines
 - 1. No new rules or studies identified
 - 2. Continued review of
 - a. Meat and Poultry Products Point Source Category - nitrate
 - b. Petroleum Refining – dioxin and metals
 - c. Pulp and Paperboard – dioxin and dioxin-like compounds

Resources:

- State of Michigan Part 23 Rules: www.michigan.gov/biosolids (select “Industrial Pretreatment” from left navigation menu, then scroll down to Laws and Rules.
- U.S. EPA Pretreatment Program: http://cfpub.epa.gov/npdes/home.cfm?program_id=3
- Categorical Standards: <http://www.epa.gov/waterscience/guide/industry.html>