

INDUSTRIAL DISCHARGES TO WASTEWATER TREATMENT PLANTS

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I. Discharges to WWTP's is Covered in 3.2.1 of the Manufacturer's Guide (Indirect Discharges)

1. **"Directly"** discharging wastewater to a surface water (e.g., lake, stream, storm sewer) or to the groundwater (e.g., spray irrigation, injection)

2. **"Indirectly"** discharging wastewater, sending it offsite for disposal (e.g., hauling to a centralized waste treater, discharging the wastewater to a Municipal Wastewater Treatment Plant (3.2.1))

II. What do I need to know about discharging to a WWTP?

A. Industrial Pretreatment Program

- A water pollution control program to prevent
 - Interference
 - Pass through
 - Contamination of biosolids
 - Worker Health and Safety
 - Damage to WWTP and collection system

B. Industrial Pretreatment Program Regulations

- Part 403 of Title 40 of the Code of Federal Regulations (40 CFR Part 403)
- Categorical Pretreatment Standards
- Rule 323.23 of the Michigan Administrative Code (Part 23 Rules)
- Local Sewer Use Ordinance (SUO)

Categorical Pretreatment Standards, EPA Guidance Materials on Categories, etc., available from EPA online at:
<http://nepis.epa.gov>

Title 40 of the Code of Federal Regulations
<http://cfpub.epa.gov/npdes/npdesreg.cfm>

SEARCH MICHIGAN RULES
(The Administrative Code) ONLINE:

www.michigan.gov/orr

Michigan Administrative Code

- Search by Department (DEQ)
- Water Bureau
- Part 23, Industrial Pretreatment

- Categorical Standards, 40 CFR Parts 404 - 471
 - Metal Finishing
 - Electroplating
 - Organic Chemical Formulation
 - Pharmaceuticals
 - Metal Molding and Casting
 - Iron & Steel
 - Leather Tanning

www.epa.gov/waterscience/guide/industry.html

III. What to expect from an IPP municipality

- A. IPP Sewer Use Ordinance
- B. Wastewater discharge/Industrial User Permit
- C. Monitoring
- D. Inspections
- E. Enforcement
- F. Compliance assistance
- G. Protection of the local environment
- H. Fair treatment

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- A. IPP Sewer Use Ordinances
 - Establishes legal authority for the municipality to:
 - issue permits
 - setting discharge limits
 - conducting inspections and monitoring
 - Enforce the IPP...
 - Local Limits
 - Approved by the DEQ

- B. Industrial User Permits
 - Discharge Authorization
 - Effluent limits
 - Monitoring and Reporting requirements
 - Test methods - 40 CFR 136
 - Sample type and location
 - Best Management Practices (BMP's)
 - Notification requirements
 - Records retention requirements

- C. Monitoring
 - At least once per year
 - All regulated pollutants
 - Representative
 - Split samples?

- D. IPP Inspection
 - Process areas where wastewater is generated
 - Chemical storage areas
 - Pretreatment system
 - Monitoring location
 - Records review

- E. Enforcement
 - Violations
 - discharge limits
 - late reports
 - Compliance schedules
 - other IPP requirements

 - Enforcement tools
 - Phone call
 - Notice of Violation
 - Administrative Consent Order/Agreement
 - Fines
 - Termination of service

- F. Compliance Assistance
 - IPP staff
 - Local requirements
 - EPA and DEQ requirements
 - Treatment systems
 - Pollution prevention

 - DEQ and EPA staff
 - State and federal regulations
 - Categorical standards

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- H. Fair Treatment
- Categorical standards
 - Local Limits
 - Procedures
 - Enforcement Response Plan

IV. Prohibited Discharges

- Interfere or Pass-through
- Fire or Explosion (Flashpoint <140°F)
- Corrosive (pH<5)
- Block Flow
- Heat (<140°F)
- Oil
- Toxic Gases
- Trucked Wastewater (unless at designated points)

V. Why are local requirements different?

- A. Size of the WWTP
- B. Treatment technology
- C. Receiving Stream
- Surface Water Discharging WWTPs: Receiving stream size and quality can affect WWTP's own discharge limits.
 - Receiving streams may require additional protections
 - State Rules
 - Coldwater Streams
 - Designated trout streams
 - Historic or ongoing pollutant discharges
 - Shared use with other WWTPs,
 - Surface water impoundments
 - Drinking water intakes
 - Groundwater Discharging Facilities
- D. Ratio of domestic to nondomestic users

Size of WWTP & Treatment Technology

Wastewater Stabilization Lagoon

- Simplest treatment system
- Hold wastewater for long periods of time, until biological treatment is complete.
- May have mechanical aeration, chemical feed

Mechanical Treatment Plants

- Mechanically "accelerate" biological processes.
- Settling, advanced chemical feed, solids handling.
- Some have tertiary treatment such as sand filtration.

"Massive" Treatment Plants

Capacity Allocations

- Local policy decision
- Allocations can be uniform (everyone gets the same concentration or mass limit)
- Or non-uniform (everyone gets their own individual limits)
- Allocations ("local limits") will be found in the local sewer use ordinance

- The pollutants contributed by these sources will vary because no two municipalities are exactly alike

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VI. Summary

- All municipal WWTPs are different
- All WWTPs have a limited capacity
- Municipalities may be required to implement an IPP
- The IPP protects the environment, POTW workers and infrastructure
- Local IPP staff are knowledgeable and can provide valuable assistance

VII. Regulatory Update -- "Pretreatment Streamlining Rules"

- Published October 14, 2005
- Effective November 14, 2005
- Reduce the burden on municipalities and industries
- More restrictive changes must be implemented
- Less restrictive changes cannot be implemented in Michigan until State rules are changed

VIII. Regulatory Update -- "Clarification" of 403.12(g)(3) composite sampling requirements.

- Old language:

"The Control Authority may waive flow-proportional composite sampling for any Industrial User that demonstrates that flow-proportional sampling is infeasible."

- New Language:

"For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority. Where time-proportional composite sampling or grab sampling is authorized by the Control Authority, the samples must be representative of the Discharge and the decision to allow the alternative sampling must be documented in the Industrial User file for that facility or facilities."

- What does this mean to me?
 - If you discharge to a POTW with design flow <5MGD (MIPP) – Not yet
 - If you discharge to a POTW with design flow >5 MGD (FIPP)
 - you must collect flow-proportional composite samples
 - Or demonstrate that time-proportional composite sampling or grab samples are representative
 - And have authorization from the IPP Control Authority to conduct time proportional 24 hour composite samples