

Industrial Pretreatment Program 101

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What is the industrial Pretreatment Program?

- Pretreatment = pollutant control requirements for nondomestic sources discharging wastewater to sewer systems that are connected to publicly owned treatment works
- National program
- Implemented through EPA Regions, States, and local programs

Why do we need pretreatment?

Purpose of the Pretreatment Program

- Prevent the introduction of pollutants into POTWs which will:
 - interfere
 - pass through, and/or
 - be incompatible
- To improve opportunities to recycle and reclaim wastewaters and sludges
- To protect POTW workers

IPP regulations

- Federal Pretreatment regulations
 - Clean Water Act
 - 40 CFR Part 403
 - 40 CFR Parts 405-471
 - (Categorical Standards)
- Michigan IPP Regulations
 - NREPA - Act 451 of 1994, as amended
 - Part 23 Rules

Local Pretreatment Standards

- Local Limits
- Best management practices (BMPs)
- Additional specific prohibitions
- Industrial user management plans
- Case-by-case discharge limits

Who is affected?

- Approval Authority
- POTW
- Industrial Users
- Waste haulers
- Commercial entities

So what does that mean for me?

Nondomestic Users

- General Prohibitions
- Specific Prohibitions
- Local Pretreatment Standards

General prohibitions - Rule 323.2303(1)

- A nondomestic discharger may not introduce into a POTW any pollutant(s) which cause pass through or interference.

Specific prohibitions - Rule 323.2303(2)

- Fire or Explosion (Flashpoint <140°F)
- Corrosive (pH<5)
- Block Flow
- Flow Rate or Concentration
- Heat (<140°F)
- Oil
- Toxic Gases
- Trucked Wastewater (except at designated points)

Industrial Users

- Hauled Waste permits
- General Permits
- Individual Permits

Significant Industrial User (SIU)

- Nondomestic User
- Subject to Categorical Standards
- ≥ 25,000 gallons per day
- ≥ 5% average dry weather hydraulic or organic capacity of the POTW
- Designated by control authority

Categorical Industrial User (CIU)

- Subject to one or more Categorical Pretreatment Standard(s)
- 40 CFR Parts 405-471

Metal finishing**Iron and Steel Manufacturing****Pulp, Paper and Paperboard Manufacturing****SIU/CIU Permit**

- Statement of duration
- Effluent limits
- Self-monitoring, sampling reporting, notification and recordkeeping requirements
- Applicable civil and criminal penalties
- Statement of nontransferability
- Other conditions

Self-Monitoring Requirements

- SIU/CIU Permit identifies
- Location
- Frequency
- Pollutants
- Sample Type
- 40 CFR 136 Approved Methods

Self-monitoring reports

- Flow
- Sampling data
- Analytical methods
- Additional monitoring
- Signature
- Certification

CIU Reports

- Baseline Monitoring Report (BMR)
- 90-Day Compliance Report
- Toxic Organic Management Plan (TOMP)

Other reports

- Slug discharge control plan
- Compliance schedule progress reports

Signatory and Certification Requirements

- Baseline Monitoring Reports
- 90-day compliance reports
- Periodic Compliance Reports
- TOMP

SIU/CIU Record Keeping

- Keep for at least 3 years
- Available for inspection
- Records include:
 - Monitoring
 - BMP Documentation
 - Any other records required by POTW

Notification Requirements

- Potential problems including slug loadings
- Change in potential for slug discharge
- Noncompliance notification and repeat sampling report
- Substantial change in volume or character of the discharge
- Discharge of hazardous waste
- Bypass

Additional notification requirements for CIUs

- New processes
- Changes in production level
- Material or significant change affecting the alternative limit calculation

Control Authority Oversight

- Comprehensive Inspection
- Annual sampling
- Evaluate Slug/Spill Potential
- Investigate Noncompliance
- Enforcement

Significant Non-compliance

- Annual publication in newspaper
- Evaluated on a “Rolling Quarter” basis.

Significant Non-compliance (SNC)

- Chronic - $\geq 66\%$ of all measurements exceed the limit
- TRC - $\geq 33\%$ of all measurements exceed the technical review criteria
- Interference or pass through
- Imminent danger to human health or environment
- Compliance schedule milestone > 90 days late
- Required reports > 30 days late
- Failure to accurately report noncompliance

Questions and Parting thoughts