

# INDUSTRIAL PRETREATMENT PROGRAM 101

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**MECC**

**MICHIGAN  
ENVIRONMENTAL  
COMPLIANCE  
CONFERENCE**

# 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

# PURPOSE OF THE PRETREATMENT PROGRAM (CONTINUED)

- 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  $<140^{\circ}\text{F}$ )
- Corrosive (pH $<5$ )
- Block Flow
- Flow Rate or Concentration

# SPECIFIC PROHIBITIONS (CONTINUED)

- 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
- $\geq 25,000$  gallons per day
- $\geq 5\%$  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 record-keeping requirements

# SIU/CIU PERMIT (CONTINUED)

- 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

# NOTIFICATION REQUIREMENTS (CONTINUED)

- 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?



# PARTING THOUGHTS

