Industrial
Pretreatment

Pretreatment Program Overview

National Pretreatment Overview

During the 50's and 60's the U.S. experienced an industrial boom.

Increased levels of pollution never before seen.

News media reported:
- Images and stories of
- dying fish, burning rivers,
- black smog engulfing cities

In 1970, the U.S. EPA created by executive order in response to the critical environmental problems.

In 1972, Congress passed the Clean Water Act (CWA) to restore and maintain the integrity of the nation's waters.

The CWA required:

Elimination of pollutants being discharged into the nation's waters.

Achievement of fishable and swimmable water quality levels.

EPA's National Pollutant Discharge Elimination System (NPDES) developed.

NPDES Program represents one of the key components established to accomplish this feat.

NPDES requires all point source discharges to waters of the U.S. (i.e., "direct discharges") be permitted.

To address "indirect discharges" from industries to Publicly Owned Treatment Works (POTWs), EPA established the National Pretreatment Program.

National Pretreatment Requirements

General Pretreatment Regulations require all large POTWs (i.e., those designed to treat flows of more than 5 million gallons per day) and smaller POTWs with significant industrial discharges to establish local pretreatment programs.

Local programs must enforce all national pretreatment standards and requirements in addition to any more stringent local requirements necessary to protect the POTW.

1. Legal Requirements

The POTW must operate pursuant to legal authority enforceable in Federal, State or local courts, which authorizes or enables the POTW to apply and enforce any pretreatment regulations developed pursuant to the CWA.

1. Legal Requirements

At a minimum, the legal authority must enable the POTW to:

a. Deny or condition discharges to the POTW;
b. Require compliance with standards and requirements;
c. Control IU discharges through permits, orders, or similar means;

1. Legal Requirements

At a minimum, the legal authority must enable the POTW to:

d. Require IU compliance schedules when necessary to meet applicable pretreatment standards and/or requirements and the submission of reports to demonstrate compliance;
e. Inspect and monitor IUs;
f. Obtain remedies for IU noncompliance; and
g. Comply with confidentiality requirements.

2. Procedures

The POTW must develop and implement procedures to ensure compliance with pretreatment requirements, including:

a. Identify and locate all IUs subject to the pretreatment program;
b. Identify the character and volume of pollutants contributed by such users;
c. Notify users of applicable pretreatment standards and requirements;

2. Procedures

d. Receive and analyze reports from IUs;
e. Receive and analyze IU discharges and evaluate the need for IU slug control plans
f. Investigate instances of noncompliance; and
g. Comply with public participation requirements.

3. Funding

The POTW must have sufficient resources and qualified personnel to carry out the authorities and procedures specified in its approved pretreatment program.

4. Local limits

The POTW must develop technically based local limits or demonstrate why these limits are not necessary.

5. Enforcement Response Plan (ERP)

The POTW must develop and implement and ERP that contains detailed procedures indicating how the POTW will investigate and respond to instances of IU noncompliance.

6. List of SIUs

The POTW must prepare, update, and submit to the Approval Authority a list of all Significant Industrial Users (SIUs).

Protecting Your POTW

1. Worker health and safety concerns

   a. Determine types of pollutants discharged
   b. Lessen odors/H_2S

Protecting Your POTW

2. Protect communities' investment/infrastructure

   a. Design concerns – hydraulic constraints
   b. Diversions
   c. Upgrades – rehabbing system
   d. Detection of new users
   e. Loading – determine rates

Protecting Your POTW

3. Protecting public health

   a. Preventing SSO's
   b. Lessen odors/H2S

Resources

1. Attorney's Office
   a. Development of Ordinance
   b. Enforcement Response Plan
   c. Assist in developing policies - not in ordinance

Resources

2. Finance Office
   a. Development Fees
   b. Rate Development
   c. Use of fines to finance training equipment
   d. Water consumption – discharge rates

Resources

3. Building Safety
   a. Establish who is "control authority" of POTW
   b. Enforcement of plumbing / mechanical codes
   c. Occupancy ratings/uses

Resources

4. Engineering / GIS

   a. Knowledge of system
   b. Re-design/corrections of hydraulic flaws
   c. Mapping

Resources

5. Fire Prevention

   a. Chemical storage and control
   b. Worker Health & Safety

Resources

6. Regulatory/Educational Agencies

   a. EPA Regions
   b. ADEQ
   c. ADOSH
   d. County Health
   e. AZ Attorney General's Office
   f. Western States Project
   g. NETI

Questions?

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