

Pretreatment Program Updates



BAXTER & WOODMAN Consulting Engineers



NACWA - USEPA PT MEETING

- Held in May 2011 in St. Louis
- 23 presentations & 2 meetings - 2 ½ days
 - Can get everything on-line
 - Nacwa.org
 - Left tab - Conference & Professional Development
 - See archives at bottom of page
 - Next year May 9-11 in Pensacola, Florida

Effluent Guidelines Program Update

18 May 2011



Presented to:

NACWA Pretreatment & Pollutant
Prevention Workshop
St. Louis, MO

Presented by:

Carey A. Johnston, P.E.
U.S. EPA, Office of Water
Washington, DC



Office of Water

2010 Effluent Guidelines Program Plan

- Under section 304(b) the CWA requires EPA to annually review its existing effluent guidelines for direct discharges and revise such guidelines “if appropriate.”
- For point source categories with existing pretreatment standards:
 - EPA must annually review these existing pretreatment standards and revise such guidelines “if appropriate (section 304(g)) or “from time to time, as control technologies, processes, operating methods, or other alternatives change” (section 307(b)).
- For point source categories without existing pretreatment standards:
 - EPA must establish pretreatment standards for pollutants not susceptible to treatment by Publicly Owned Treatment Works (POTWs) or that would interfere with the operation of POTWs (section 307(b)).



2010 Effluent Guidelines Program Plan

- The 1987 Clean Water Act Amendments added Section 304(m), which re-enforced Congress' intent that effluent guidelines keep pace with pollution prevention and treatment technology.
- Every other year: after proposal and public comment, EPA must publish a two-year plan for the guidelines program.
- EPA provided updates on three studies with its publication of the preliminary 2010 plan (28 December 2009).
 - Coalbed Methane Extraction;
 - Health Care Industry (Unused Pharm./Dental Amalgam); and
 - Ore Mining and Dressing.
- EPA initiated an effluent guidelines rulemaking for dental offices (mercury amalgam) on 27 September 2010 (more on this later).
- EPA submitted the final 2010 Plan to OMB on 24 January 2011. EPA anticipates publication this Spring.





Amalgam Workgroup

- Region 1 – Jay Pimpore
- Region 8 – Al Garcia
- Narragansett Bay
- **THEY GET IT – LOTS OF COMMENTS**
 - ISO < 95% vs. want separators at 98-99%
 - Big group (100,000 plus)
 - Use general permit with BMP, make NSCIU
 - Inspect 1-5 years in discussion



Other effluent guidelines

- Airport Deicing
- Coalbed Methane Extraction
- Chlorine and Chlorinated Hydrocarbon (CCH)
- Construction and Development
- Drinking Water Treatment
- Steam Electric Power Generating

Detailed Study: Health Care (Unused Pharmaceuticals)

Goals

- Scope of study includes Hospitals, Long Term Care Facilities (LTCFs), Doctors' Offices, Health Care Clinics, Hospices and Veterinary Facilities.
- Summarizing Federal and State Regulations.
- Identify current practices and best management practices.

Preliminary Observations

- Unused pharmaceutical management is a concern to state and local pretreatment programs.
- Current policies for managing unused pharmaceuticals include flushing, disposal in municipal trash, steam sterilization with medical waste, incineration, and using a reverse distributor to return unused pharmaceuticals.

Draft Guidance Document:

- In August 2010 EPA released its draft "Best Management Practices for Unused Pharmaceuticals at Health Care Facilities". EPA received over 90 comments.
- EPA is preparing responses these comments and revising its guidance document.
- EPA expects to publish the revised document later this year.



http://water.epa.gov/scitech/wastetech/guide/unusedpharms_index.cfm

Revised Effluent Guidelines Website

- EPA's Office of Water has overhauled its website to make its content management easier. Please note that many URLs have changed.

<http://water.epa.gov/scitech/wastetech/guide/index.cfm>

- We are requesting your help in identifying the next round of industry ELG webpages for updates.
 - Which industry ELG webpages do you want updated?
 - What topics would you like to see more information on to help you with your program?
 - Do you have any suggestions on how to improve the layout or style of the webpages?
- Comments and suggestions are welcome!



Revised Effluent Guidelines Website

EPA United States Environmental Protection Agency

Advanced Search [A-Z Index](#)

LEARN THE ISSUES SCIENCE & TECHNOLOGY LAWS & REGULATIONS ABOUT EPA

Industry Effluent Guidelines [Contact Us](#) [Share](#)

You are here: [Water](#) > [Science & Technology](#) > [Wastewater Technology](#) > [Effluent Limitation Guidelines](#)

Effluent Limitation Guidelines

[Best Management Practices for Unused Pharmaceuticals at Health Care Facilities - Draft for Public Comment](#)

[Notice of Availability of Preliminary 2010 Effluent Guidelines Program Plan](#)

[Airport Diving Proposed Rule](#)

Effluent guidelines are national standards, based on the performance of treatment and control technologies, for wastewater discharges to surface waters and municipal sewage treatment plants. We issue effluent guidelines for categories of existing and new sources.

- [Browse Industries](#)
 - Existing and proposed regulations
 - Fact sheets and supporting documentation
 - Preliminary studies
 - Guidance for specific industrial categories
- [Planning](#)
 - Information on EPA's current and previous reviews and plans for controlling industrial discharges
- [Implementation & Compliance](#)
 - Permitting, POTWs
 - Compliance and enforcement
 - For industry-specific documents, see [Industries](#)
- [Treatment Technologies](#)
 - Data sources on pollution prevention and treatment technologies

Other sites

- [Analytical Test Methods](#)
- [Cooling Water Intakes \(CWI\)](#)

Contacts

- [Effluent Guidelines Industrial Wastewater Contacts](#)
- [Direct Discharge Permit \(DDP\) Contacts](#)
- [Indirect Discharge \(Pretreatment\) Contacts](#)



Revised Effluent Guidelines Website

Existing Regulations

The table below lists the effluent guidelines promulgated by EPA, sorted alphabetically by industry category. The links in the 'Industry Category' column provide an overview of the regulation and available EPA publications for the category. The links under '40 CFR' go directly to the *Code of Federal Regulations (CFR)*.

For many of the newer guidelines (especially those promulgated after 1995), we provide individual industry pp. with the Federal Register notices of proposed and final rules, supplemental notices, fact sheets and other background information. For older guidelines, individual pp. are being developed. We provide an interim link to an EPA staff contact.

Existing Effluent Guidelines			
Industry Category	40 CFR Part	First Promulgated	Limitations and Standards
Aluminum Forming	467	1983	BPT, BAT, NSPS, PSES, PSNS
Asbestos Manufacturing	427	1974	BPT, BCT, BAT, NSPS
Battery Manufacturing	461	1984	BPT, BAT, NSPS, PSES, PSNS
Canned and Preserved Fruits and Vegetable Processing	407	1974	BPT, BCT, NSPS, PSES, PSNS
Canned and Preserved Seafood (Seafood Processing)	408	1974	BPT, BCT, NSPS

Clicking on industry category leads to industry specific page or contact

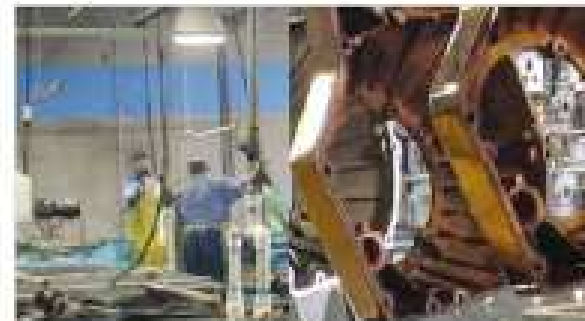


Revised Effluent Guidelines Website

Industry specific page

Effluent Guidelines: Metal Finishing

The metal finishing effluent guidelines (40 CFR 433) were promulgated in 1983 and regulate wastewater from wide variety of industries performing various metal finishing operations. EPA estimates that there are approximately 44,000 facilities performing various metal finishing operations that discharge process wastewater directly to surface waters or indirectly to surface waters through POTWs. The metal finishing effluent guidelines are incorporated into NPDES permits for direct dischargers or permits or other control mechanisms for indirect dischargers.



On July 15, 1983, this regulation amended the pretreatment standards for existing source electroplaters (electroplating PSES). 40 CFR Part 411.

You will need Adobe Reader to view some of the files on this page. See EPA's PDF page to learn more.

- [What is Metal Finishing?](#)
- [Facilities Covered](#)
- [Final Rule](#)
- [Guidance and Background Documents](#)
- [Additional Information](#)
- [Proposed Rule](#)

What is Metal Finishing?

Metal finishing is the process of changing the surface of an object, for the purpose of improving its appearance and/or durability. Also, metal finishing is related to electroplating, which is the production of a thin surface coating of the metal upon another by electrodeposition.





- USEPA Headquarters Contacts
- Effluent Guidelines Expert Contact List
 - <http://water.epa.gov/scitech/wastetech/guide/contact.cfm>
- State Contacts

Development of DMR Pollutant Loading Tool

- Similar to Toxics Release Inventory (TRI) – this new web tool is for CWA point source discharge monitoring data.
 - Who is discharging What and Where
- Calculates pollutant loads (pounds) from discharge monitoring data.
 - Pollutant Discharge Concentration (mg/L) X Flow (Million Gallons per Day) X 8.34 (conversion factor).
- Significant implications for:
 - Enforcement targeting and compliance assistance (providing better sense of the importance of effluent discharges and permit limit violations)
 - Public access
 - Effective and timely communication on characterizing point source dischargers
 - Better data for watershed modeling and pollution budgets (TMDLs), developing effluent limits, enhancing EPA Regional and State NPDES program quality, and EPA rulemakings (effluent guidelines)
- Data available for 23,720 facilities with discharge monitoring data.



For More Information...

Further updates on the EPA's effluent guidelines program including electronic copies of EPA supporting analyses and Federal Register notices can be found at:

<http://water.epa.gov/scitech/wastetech/guide/index.cfm>

OR

search on: EPA effluent guidelines

Name	Topic Area	Phone	E-mail
Bill Swietlik	Effluent Guidelines Planning	(202) 566 1129	swietlik.william@epa.gov
Damon Highsmith	Dental Amalgam Pretreatment Standards	(202) 566 2504	highsmith.damon@epa.gov
Meghan Hessenauer Samantha Lewis	Unused Pharmaceutical Guidance Document	(202) 566 1040 (202) 566 1058	hessenauer.meghan@epa.gov lewis.samantha@epa.gov
Maria Gomez-Taylor	Updating Clean Water Act Methods	(202) 566 1005	gomez-taylor.maria@epa.gov
Eric Strassler	Effluent Guidelines Website	(202) 566 1026	strassler.eric@epa.gov
Carey Johnston	DMR Pollutant Loading Tool	(202) 566 1014	johnston.carey@epa.gov





U.S. EPA Update - Pretreatment Program

Jan Marie Pickrel
US EPA, Office of Wastewater Management

May 18, 2011, St. Louis, MO
NACWA 2011

National Pretreatment & Pollution Prevention Workshop



Training Opportunities

- “Pretreatment 101” Webinar Series:
<http://www.epa.gov/npdes/training>
- POTW’s Procedures for Conducting Compliance Monitoring
- POTW’s Procedures for Conducting Compliance Inspections
- Industrial User Waste Survey Procedures
- *FAQs for the above documents coming soon*

Training Opportunities (continued)

- “Pretreatment 101” Webinars *coming soon*:
 - Introduction to the National Pretreatment Program – June 2011
 - What are “Pretreatment Standards” that apply to Industrial Users?
 - Developing Local Limits to Prevent Pass Through and Interference
 - Hauled and Trucked Waste





Training Webcasts

- Archived web training
- Slides
- Resource page
- Linked to documents
- Examples from other POTWs
- Certificate of completion



Guidance Manuals

- Introduction to the National Pretreatment Program – April 2011
- Industrial User Permitting Guidance Manual – *coming soon*

Updating 1983 manuals:

- Procedures Manual for Reviewing a POTW Pretreatment Program Submission
- Guidance Manual for POTW Pretreatment Program Development

Pretreatment Performance Measures

- Handbook: Measuring Success in Your Pretreatment Program
- NPDES Electronic Reporting Rule Nexus
- Net-DMR, and CROMERR
- Other E-formats?





Enduring Topics of Concern

- Water Security

<http://water.epa.gov/infrastructure/watersecurity/emergency/index.cfm>

- Pyrethroids Data Requirements

<http://www.epa.gov/oppsrrd1/reevaluation/pyrethroids-pyrethrins.html#epa>

- Pharmaceuticals in Water

- Prions as Pest: rule proposed 1/26/11

- Comments due 3/28/11

Any Questions?

- Jan Pickrel:
202-564-9704
pickrel.jan@epa.gov





-Questions??????

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