

# **National Pretreatment Program Update: Streamlining Progress and National Update**

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USEPA Region IX & California SWQCB Pretreatment  
Regulations Training  
Regional Water Quality Control Board-Colorado River Basin**

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# Activities at the “National Level” in the Pretreatment Program

- Streamlining Rule Summary
- Streamlining Rule Implementation  
(Guidance Update, Tool Development)
- Clean Water Act Action Plan (CWAAP)
- Industry Sectors / Effluent Guidelines
- Contaminants of Emerging Concern  
(mercury, unused pharmaceuticals, etc.)

## Pretreatment Streamlining Rule:

# Summary of Final Rule Changes

- 13 Changes to 40 CFR 403 that must be adopted by States and POTW Pretreatment Programs
  
- Other Changes to 40 CFR 403 are optional for States and POTW Pretreatment Programs
  - Fact Sheet 1.0: Pretreatment Streamlining Rule: Summary of Changes Made Under the Streamlining Rule  
[http://www.epa.gov/npdes/pubs/streamline\\_factsheet\\_1.0.pdf](http://www.epa.gov/npdes/pubs/streamline_factsheet_1.0.pdf)
  
  - Fact Sheet 2.0: Required Changes  
[http://www.epa.gov/npdes/pubs/pretreatment\\_streamlining\\_required\\_changes.pdf](http://www.epa.gov/npdes/pubs/pretreatment_streamlining_required_changes.pdf)

## Pretreatment Streamlining Rule:

# Summary of Final Rule Changes

- POTW Pretreatment Programs cannot be less stringent than State regulations
- Notification requirements (40 CFR 403.18):
  - substantial modifications: revised local authorities and program procedures must be submitted for approval
  - nonsubstantial modifications: revisions must be submitted at least 45 days before implementing the program changes

## Pretreatment Streamlining Rule: **Incorporating Streamlining**

- Making required revisions to POTW pretreatment programs
- Assessment of program changes during pretreatment compliance inspections/audits
- NPDES pretreatment program requirements

# Pretreatment Streamlining Rule: **Tool Development**

Fact Sheets: [http://cfpub.epa.gov/npdes/home.cfm?program\\_id=3](http://cfpub.epa.gov/npdes/home.cfm?program_id=3)

1. **Summary of Changes**
2. **Required Changes**
3. **Equivalent Mass Limits**
4. **Equivalent Concentration Limits**
5. **New Classifications for CIU**
6. **Sampling/Pollutants-Not-Present**
7. **Best Management Practices (BMPs)**
8. **Slug Control Plans**
9. **General Permits**
10. **Significant Non-Compliance (SNC) – *in review***

# Pretreatment Streamlining Rule: **More Tools in Development**

- **Guidance Manual Updates/Revisions**
  - **Model Sewer Use Ordinance** – *Word and pdf*
  - **Checklist - Model Sewer Use Ordinance Reviews** – *Word and pdf*
  - **Control Authority Pretreatment Audit Checklist and Instructions** – *Word and pdf*
  - “Introduction to the National Pretreatment Program” – *in review*
  - “Industrial User Permitting Guidance Manual” – *in review*

[http://cfpub.epa.gov/npdes/docs.cfm?document\\_type\\_id=1&view=1&program\\_id=3  
&sort=date\\_published](http://cfpub.epa.gov/npdes/docs.cfm?document_type_id=1&view=1&program_id=3&sort=date_published)

**OR:** Go to: [http://cfpub.epa.gov/npdes/home.cfm?program\\_id=3](http://cfpub.epa.gov/npdes/home.cfm?program_id=3)

Click on “Publications” (right column); Click on “Policy and Guidance Documents”

# Clean Water Act Action Plan: **Summary of CWAAP**

- Announced on July 6, 2009
- Submitted to the Administrator on October 15, 2009
- Goals:
  - Enhance public transparency
  - Strengthen enforcement performance
  - Transform water quality and compliance information systems
- Methods:
  - Target enforcement at most important water pollution problems
  - Strengthen oversight of the states
  - Improve transparency and accountability

<http://www.epa.gov/oecaerth/civil/cwa/cwaenfplan.html>

## Clean Water Act Action Plan:

# How it Affects Pretreatment

- Attention from upper EPA Office of Water management and the Office of Enforcement & Compliance Assurance (OECA)
  
- Concerns:
  - Program resources
  - Data entry
  - Establishing and enforcing categorical pretreatment
  - Lack of oversight
  - Emerging pollutants
  - Data integration and reporting

## Clean Water Act Action Plans:

# Tools / Guidance in Development

- Resources allocated for:
  - Pretreatment Compliance System (PCS) - Integrated Compliance Information System (ICIS) data entry guidance
  - POTW annual reports guidance
- Targeting improvement of data entry, review, and display procedures
  - Robust and reliable pretreatment data will enable oversight and allow for greater enforcement capabilities
  - Data availability (e.g., the public)

## Pretreatment Webcasts

# Special Topics and Training

- 3 Pretreatment webcasts
  - POTWs and the Dental Mercury Discharges (June 2009)
  - Management of Unused Pharmaceuticals and the Proposed Universal Waste Rule (September 2009)
  - 2010 Effluent Guidelines Program Plan: Update for State and Regional Pretreatment Coordinators (January 2010)
  
- Continuing webcast series – in development
  - Training (Pretreatment 101)
  - Introduction to new program materials (e.g., launch of new guidances)
  - Special topics
  
- Available at <http://www.epa.gov/npdes/training>

## Pretreatment Webcasts

# Dental Mercury Webcast

- Speakers:
  - Jan Pickrel, EPA OW/OWM/WPD
  - Damon Highsmith, EPA OW/OST
  - Justin Pimpare, EPA OW/Region 1
  
- Results from the EPA Health Services Industrial Detailed Study on Dental Amalgam
  
- Discussion of the EPA/American Dental Association/National Association of Clean Water Agencies Memorandum of Understanding on Promoting Dental Amalgam Separators
  
- Resources document – links to additional materials

## Pretreatment Webcasts

# Disposal of Unused Pharmaceuticals

- Speakers:
  - Samantha Lewis, US EPA
  - Lisa Lauer, US EPA
  - Charlotte Smith, PharmEcology Services WM Healthcare Solutions
  
- EPA's study of unused pharmaceutical disposal practices at health care facilities
  
- Proposal to add hazardous pharmaceutical waste to the Federal Universal Waste Program
  
- Resources document – links to additional materials

## Pretreatment Webcasts

# 2010 Effluent Guidelines Plan

- Speaker: Carey Johnston, US EPA
- Preliminary 2010 Effluent Guidelines Program Plan notice signed December 17, 2009
- Published in Federal Register on December 28, 2009 – request for comments
- Background on the effluent guidelines program and 304(m) planning process
- Review results of 2009 annual review of existing effluent guidelines (ELGs)
- Review status of on-going studies supporting annual review of ELGs:
  - Coalbed Methane Extraction
  - Health Care (Unused Pharmaceuticals)
  - Ore Mining and Dressing

## Pretreatment Webcasts

# 2010 Effluent Guidelines Plan

- Review schedule and receive feedback on direction of 304(m) studies
- Resources document – links to additional materials
- More information available at <http://epa.gov/guide/304m/>

## For more information...

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