



## P R E T R E A T M E N T   B U L L E T I N

Date: November 6, 1987

No. 3

Pretreatment Bulletins, this being the third to date, are issued on an as-needed basis to transmit policy, guidance, regulatory changes and other specific information to all pretreatment POTWs to assist them in the development and implementation of pretreatment programs.

### CLEAN WATER ACT AMENDMENTS EFFECT ON PRETREATMENT

On February 4, 1987, Congress enacted amendments to the Federal Clean Water Act. These amendments (contained in the Water Quality Act of 1987) generally reinforce the pretreatment program requirements and add greater enforcement authority to EPA. The areas of the amendments most significant to pretreatment are:

- ° increasing the civil penalty authority of EPA from \$10,000 per day for each violation to \$25,000 per day for each violation (§313)
- ° changing the criminal penalty from a misdemeanor to a felony (§312)
- ° clarifying that IU violations of the requirements in a local pretreatment program are Federally enforceable (§312 and 313)
- ° adding two classes of administrative penalties of up to \$25,000 for a Class I penalty or \$125,000 for a Class II penalty. This provision of the Act substantially reduces the procedures for EPA's assessment of fines (§314)
- ° requiring EPA to promulgate sewage sludge regulations including specific numeric criteria for various uses or disposal practices. The sludge requirements are to be implemented either through the NPDES permit or an alternative State sludge permit program. Until final national rules are promulgated, EPA is directed to make case-by-case determinations on appropriate requirements for a POTWs sludge management (see article on page 2 of this bulletin regarding the status of sludge regulation development) (§406)
- ° requiring EPA to report to Congress on the pretreatment program and means of improving its effectiveness. The report is due in four years (§519)
- ° requiring the Administrator of EPA to ensure that an adequate number of employees are working within the pretreatment program to enable better implementation of pretreatment requirements and overview of approved local POTW programs (§309).

The full text of the Water Quality Act of 1987 can be found in the Congressional Record and will be published in the United States Code.



REGULATORY UPDATEDOMESTIC  
SEWAGE STUDY

The Domestic Sewage Study (DSS) was submitted to Congress by EPA in response to Section 3018(a) of the Resource Conservation and Recovery Act (RCRA). That provision directed the Agency to report to Congress on wastes discharged to POTWs through sewer systems that are exempt from regulation under RCRA as a result of the Domestic Sewage Exclusion. On June 22, 1987, EPA issued a Federal Register notice (52 FR 23477) which summarizes the principal public comments on the Agency's preliminary approaches to fulfilling the recommendations of the DSS. This notice also discusses the program and research activities which EPA has under way to aid in this effort. Changes to the General Pretreatment Regulations to implement some DSS recommendations are scheduled to be proposed in the Spring of 1988.

SLUDGE  
REGULATIONS

The 1987 amendments to the Clean Water Act (CWA) require that permits issued to treatment works contain sludge standards. EPA is scheduled to issue proposed standards for pollutants of concern in sewage sludge in March 1988. EPA also will be proposing regulations for incorporating sludge standards in NPDES permits and for State sludge management programs in December 1987. The 1987 CWA amendments also state that, prior to development of the standards, the Administrator must put sludge conditions in permits issued to POTWs or take other appropriate action to protect public health and the environment. To meet this requirement, EPA and States will begin incorporating sludge conditions, developed on a case-by-case basis, in POTWs' NPDES permits as they expire and are reissued. EPA has developed a "Strategy for Interim Implementation of Sludge Requirements in Permits Issued to POTWs". In addition, EPA is preparing guidance to permit writers on developing interim case-by-case sludge requirements. Public notice of availability of each of these documents for public comment is expected to be published in the Federal Register in the Fall of 1987.

FDF VARIANCES  
FOR INDIRECT  
DISCHARGERS

Before passage of the Water Quality Act of 1987 (WQA), EPA had provided for a fundamentally different factors (FDF) variance from pretreatment standards for indirect dischargers. Procedural and substantive regulations were contained in 40 CFR §403.13.

Section 306 of the WQA codified (into section 301(n) of the Clean Water Act), and in some cases changed, EPA's existing FDF decision making criteria and procedures. For indirect dischargers, FDF variances are available from pretreatment standards for existing sources for conventional, nonconventional, and toxic pollutants. The statute established, among other requirements; (1) four statutory criteria (§301(n)(1)), (2) time limits for applications within 180 days after the standard is established or revised (§301(n)(2)), and (3) time limits on decision making within 180 days after submittal of a variance request (§301(n)(3)).

Legislative history indicates these provisions are self-implementing and should be used instead of existing regulations, to the extent the provisions are inconsistent with existing regulations. EPA intends to propose changes to the General Pretreatment Regulations to make them consistent with the new provisions of the Clean Water Act. For further information, contact Gary Hudiburgh at (202) 475-9531.

REMOVAL  
CREDITS  
REGULATION  
UPDATE

On April 30, 1986, the United States Court of Appeals for the Third Circuit upheld the Natural Resources Defense Council's challenge to EPA's removal credit regulation (see Bulletin No. 2). The effect of the Third Circuit ruling was to invalidate several provisions of 1984 removal credits amendments, thus leaving in effect the 1981 versions of those provisions. The current status of the removal credits regulation is:

- 1) portions of the 1984 amendments not invalidated by the Third Circuit remain in effect, and
- 2) the 1981 versions of the invalidated regulatory provisions are in effect.

Since the 1986 published version of 40 CFR §403.7 did not accurately reflect the current status of the removal credits regulation in wake of the Third Circuit's decision, on November 5, 1987, EPA published a revised version of the rule (52 FR 42434).

Announcing the status of this rule does not in itself entitle EPA to authorization of removal credits. EPA must still comply with the Third Circuit's ruling requiring a more comprehensive set of sludge regulations under section 405 of the Act as a precondition for granting removal credits. EPA is working to comply with that ruling and will be proposing an extensive set of sludge guidelines under the authority of Section 405(d) (see article on page 2 of this bulletin).

Until the sludge regulations are promulgated, no POTW can be authorized to grant removal credits. On September 1, 1987, previously existing removal credits became invalid, and industrial users (IUs) were required to achieve compliance with categorical pretreatment standards without removal credits. Control Authorities (CA's) should reissue IU permits or modify control mechanisms to incorporate a compliance schedule. Alternatively, the CA may issue an administrative order or similar mechanism that contains an appropriate schedule. Whatever vehicle is used, the schedule should be set by the CA specifying the earliest possible date by which the IU can feasibly attain compliance. EPA will be issuing removal credits enforcement guidance shortly.

#### CATEGORICAL STANDARDS

IMPLEMENTATION  
OF NATIONAL  
CATEGORICAL  
PRETREATMENT  
STANDARDS

Since the publication of the last pretreatment bulletin in March of this year, final dates for compliance with categorical pretreatment standards have passed for the following industry categories:

- ° Nonferrous Metals Manufacturing- Phase I (Subparts A-M) 6/7/87
- ° Battery Manufacturing 6/7/87

In addition, the final date for compliance with the Electrical and Electronic Components (Phase II) standards for the Cathode Ray Tube and Luminescent Materials Subcategories was 7/14/86. The 90-day Compliance Reports for these subcategories were due on 10/12/86. Please note, Pretreatment Bulletin No. 2 (page 6) incorrectly stated these milestone dates as occurring in 1987, rather than 1986.

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IMPLEMENTATION  
OF NATIONAL  
CATEGORICAL  
PRETREATMENT  
STANDARDS  
(con't)

EPA continues to prepare guidance manuals for implementing categorical standards for specific industry categories. These manuals are designed for use by Control Authorities and industrial users. The guidance manual for the Battery Manufacturing category was issued in August 1987 (see document request sheet on page 13 of this bulletin to receive a copy). Guidance for the Nonferrous Metals, Copper, and Aluminum Forming industry categories, to be covered in one manual, is expected out later this year (see document request sheet on page 13 of this bulletin to receive this publication when it is available).

CATEGORICAL  
STANDARDS  
UPDATE

Pretreatment Standards for the Organic Chemicals, Plastics, and Synthetic Fibers industry were published in the Federal Register on November 5, 1987 (52 FR 42522). These standards cover the following subcategories: rayon fibers, other fibers, thermoplastic resins, thermosetting resins, commodity organic chemicals, bulk organic chemicals, and specialty organic chemicals.

Certain key dates should be noted, as follows:

- ° Baseline Monitoring Reports are due on June 20, 1988.
- ° Compliance must be achieved by November 5, 1990.
- ° 90-day compliance reports are due on February 5, 1991.

EPA is also assessing the need for additional categorical standards for the following industries:

- ° hazardous waste treaters
- ° solvent reclaimers
- ° barrel reclaimers
- ° waste oil reclaimers
- ° equipment manufacturers and rebuilders
- ° paint manufacturers
- ° transportation
- ° industrial laundries
- ° hospitals
- ° textiles
- ° timber
- ° pharmaceuticals

By the end of 1987, decision documents, which include a rationale for whether the Agency will continue further work to establish categorical standards, will be published for hazardous waste treaters, solvent reclaimers and pharmaceuticals. Data for the remaining industries will be available in summary form at the same time.

Categorical standards for the Pesticides Industry are scheduled to be issued in 1992.

CATEGORICAL  
INDUSTRIAL  
USERS

For some industries, EPA issued standards that simply refer to the General Pretreatment Regulations. There has been confusion and inconsistencies in identifying whether such industrial users (IUs) are categorical. In the Textile category, for example, PSES requires that IUs "must comply with 40 CFR Part 403". Such IUs, which have no categorical limits beyond the General Pretreatment Regulations, are not considered categorical IUs.

However, for Pharmaceutical Manufacturing, PSES applies to facilities "where cyanide is used or generated", but requires a certification if cyanide is not used or generated. Pharmaceutical facilities (and in a similar manner Pulp, Paper, and Paperboard facilities) are considered categorical even if the requirement is simply a certification. Such certifications must be submitted as part of semi-annual reports.

Noncategorical IUs are still subject to the General Pretreatment Regulations, local limits, and may still be considered significant IU's which warrant monitoring and reporting.

APPLICABILITY  
OF CATEGORICAL  
PRETREATMENT  
STANDARDS TO  
RESEARCH AND  
DEVELOPMENT  
FACILITIES

The Pretreatment Implementation Review Task Force (PIRT), while recognizing that, at a minimum, research and development (R&D) facilities are covered by national prohibitive standards, local prohibitive standards, and local limits, recommended EPA issue guidance as to whether these facilities are regulated by categorical pretreatment standards. To respond to the PIRT recommendation and to correct previously conflicting interpretations provided to EPA Regions, the Office of Water and the Office of General Counsel recently completed a thorough review of the applicability of categorical pretreatment standards to stand alone R&D facilities.

Based on the records supporting the categorical pretreatment standards, EPA has determined that stand alone R&D facilities are not subject to the categorical standards currently promulgated. For a plant to be considered a stand alone R&D facility, there should be no commercial sale of products made at the facility. This position is stated in a letter from Ms. Rebecca W. Hammer, Deputy Assistant Administrator for Water, June 26, 1987.

EPA reserves the right to issue specific categorical standards which are applicable to stand alone R&D facilities -- however, such activity is not currently underway. The lack of currently applicable categorical standards does not mean that pollution controls are not necessary. Noncategorical indirect dischargers are still required to comply with the General Pretreatment Standards (General and Specific Prohibitions) and with limits that may be established by local or State authorities. When local or State authorities address needed pollution controls for noncategorical industrial users, EPA does consider the categorical standards and the accompanying development documents as excellent guidance on the performance of pollution control technologies. However, other site-specific factors may be considered in setting limits (potential for interference or pass through, raw waste load, age, size, land availability, flow, non-water quality impacts, energy, and costs).

GUIDANCE MATERIALPCME  
TRAINING  
MATERIALS

In July 1986, the Office of Water Enforcement and Permits issued the "Pretreatment Compliance Monitoring and Enforcement Guidance" manual (see document request sheet on page 13 of this bulletin to receive a copy). This document offers assistance and guidance to Control Authorities in implementing their pretreatment programs by providing:

- ° A definition of Significant Industrial Users (SIUs)
- ° Recommended industrial user monitoring frequencies
- ° Guidance on semi-annual reports by industrial users
- ° A definition of Significant Noncompliance (SNC) for industrial users
- ° A description of EPA's "Enforcement Management System" as a guide for Control Authorities
- ° A Pretreatment Performance Summary, that EPA recommends Approval Authorities make part of annual report requirements.

To promote the use of definitions and procedures within the guidance, EPA has developed the Pretreatment Compliance Monitoring and Enforcement Training Course Instructor's Manual. The training materials are intended for use by EPA and States when conducting pretreatment compliance monitoring and enforcement training workshops for Control Authorities.

Each EPA Regional office will receive a complete copy of the training manual with slides. This manual should be reviewed by EPA Regions and States planning to conduct a pretreatment seminar during the next 12 months. Regions and States are encouraged to give presentations using in-house personnel. However, EPA headquarters is willing to provide speakers for any of the subject areas. Three pilot training workshops have been held in Pittsburgh, PA; Richmond, VA; and Baltimore, MD. Control Authorities should contact their State or EPA Regional office regarding availability/scheduling of training workshops in your area.

PCME  
SOFTWARE

To aid POTWs and States in implementing the Pretreatment Program, and in particular the Agency's guidance on Pretreatment Compliance Monitoring and Enforcement (PCME), EPA is developing PCME computer software for IBM® (and compatible) personal computers. The software (with accompanying user's manual) currently performs these basic functions:

- 1) Serves as a computerized mechanism for storing general information (name, address, outfall and IU code), effluent limits, and monitoring data on industrial users.
- 2) Identifies instances of noncompliance and evaluates whether industrial users are in significant noncompliance (based on the definition in the guidance document).
- 3) Prepares summary reports on industrial users, monitoring data, and compliance status.

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PCME  
SOFTWARE  
(con't)

EPA is now expanding the capabilities of the software to track all the items listed in the PCME's Pretreatment Performance Summary, including: 1) submission or reports; 2) inspections and sampling events; and 3) enforcement actions. The software should be available in early 1988 in both a dBase III Plus® version (for those that have this package and may wish to modify the program) and a compiled version (which can be run without dBase III Plus® software). Copies may be obtained, when available, by using the document request form in the back of this bulletin.

PRETREATMENT  
PERMITS AND  
ENFORCEMENT  
TRACKING  
SYSTEM

EPA has developed an automated national pretreatment data tracking system known as the Pretreatment Permits and Enforcement Tracking System (PPETS). This system became operational in October 1987 and will provide EPA Regions and States with a valuable tool for oversight of pretreatment program implementation by POTWs. PPETS will be a subpart of the Permit Compliance System (PCS), the existing mainframe computer national database which tracks the compliance status of direct discharging facilities. PPETS will consist of data obtained by Regions and States from POTWs by means of pretreatment audits, pretreatment compliance inspections, annual reports (including pretreatment performance summaries), and other compliance reports.

GUIDANCE FOR  
EVALUATING AND  
REPORTING POTW  
NONCOMPLIANCE

The Office of Water Enforcement and Permits has developed guidance for EPA Regions and States to evaluate and report noncompliance by POTWs that have failed to implement their approved pretreatment programs (a copy of the guidance will be mailed shortly to all POTW, State, and Regional pretreatment personnel). The criteria specified in the guidance were developed by an EPA workgroup and presented to the States and EPA Regions at the National Pretreatment Coordinators Meeting in December 1986. Draft guidance was developed and circulated to the Regions, States and former Pretreatment Implementation Task Force members for comment in May 1987.

The guidance identifies criteria for evaluating the principal POTW activities that are essential to fully implement most local programs. If one or more of the following lettered implementation criteria are not met, POTWs should be reported by EPA and approved States on the Quarterly Noncompliance Report (QNCR) for violations of their approved pretreatment programs:

Issuance of industrial user (IU) control mechanisms

- a) failed to issue, reissue, or ratify IU permits, contracts, or other control mechanisms, where required, for "significant IUs" (SIUs) within six months after program approval. Thereafter, each SIU control mechanism permit should be reissued within 90 days after the date required in the approved program, NPDES permit, or enforcement order\*.

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GUIDANCE FOR  
EVALUATING  
AND REPORTING  
POTW  
NONCOMPLIANCE  
(con't)

POTW compliance monitoring and inspections

- b) failed to conduct at least eighty percent of the inspections and samplings of SIUs required by the NPDES permit, the approved program, or enforcement order\*.
- c) failed to establish and enforce self-monitoring requirements that are necessary to assess SIUs compliance as required by the approved program, the NPDES permit, or enforcement order\*.

POTW enforcement

- d) failed to implement pretreatment standards (including categorical standards and local limits) in an effective and timely manner or as required by the approved program, the NPDES permit, or enforcement order\*.
- e) failed to undertake effective enforcement against the IU(s) for instances of pass through or interference as defined in 40 CFR §403.3 and required by §403.5.

POTW reporting to the Approval Authority

- f) failed to submit a pretreatment report (e.g., annual report or publication of the names of significant violators) to the Approval Authority within thirty days of the due date specified in the permit, enforcement order, or approved program.

Other POTW implementation violations

- g) failed to complete a pretreatment implementation compliance schedule milestone within 90 days of the due date specified in the permit, enforcement order\*, or approved program.
- h) any other violation or group of violations of local program implementation requirements based on the permit, approved program or 40 CFR Part 403 which the State Director or EPA Regional Administrator considers to be of substantial concern.

These criteria will be applied to violations of specific requirements in an NPDES permit, the approved program, or enforcement order\*. In some cases, approved States and Regions may need to modify the approved local program and/or NPDES permit because the existing requirements are inadequate or because conditions have changed. Therefore, POTWs that lack specific program requirements for these implementation activities may receive permit modifications. In general, POTWs that meet the definition of reportable noncompliance should be priorities for resolving the inadequacies in approved programs or permits. EPA plans to incorporate specific criteria into the NPDES Regulations for noncompliance reporting of POTWs which fail to adequately implement their pretreatment programs.

\* the term enforcement order means an administrative compliance order, judicial order, or consent decree. (see 40 CFR §123.45)

GUIDANCE FOR  
POTWS  
RECEIVING  
HAZARDOUS  
WASTE

POTWs that accept hazardous wastes by truck, rail, or dedicated pipe within the boundary of the plant may be hazardous waste treatment, storage, and disposal facilities (TSDFs) and, if so, are subject to regulation under the Resource Conservation and Recovery Act (RCRA). EPA has developed the Guidance Manual for the Identification of Hazardous Wastes Delivered to Publicly Owned Treatment Works by Truck, Rail, or Dedicated Pipe to offer administrative and technical recommendations to POTWs seeking to preclude the receipt of hazardous wastes by these transportation methods, and to discuss the responsibilities of POTWs choosing to accept hazardous wastes by these transportation methods. A copy of this manual was mailed to all pretreatment POTWs in late September/early October 1987.

In accomplishing the dual purposes mentioned above, the manual provides the statutory and regulatory definitions of hazardous wastes. It also describes the RCRA regulatory status of wastes that POTW operators typically may encounter. The manual provides some guideposts which will assist the operator in making these determinations.

The manual also discusses the legal, administrative, and technical methods to preclude the receipt of hazardous wastes, many of which are already in use. A description of potential liabilities that POTWs may incur as a result of accepting hazardous wastes is also provided. The manual describes the responsibilities of POTWs that choose to accept hazardous wastes by truck, rail, or dedicated pipeline, explaining the special regulatory provisions, known as permit by rule requirements, that the RCRA program imposes upon POTWs accepting hazardous wastes by the aforementioned methods.

GUIDANCE FOR  
DEVELOPING  
INDUSTRIAL  
PRETREATMENT  
PERMITS

EPA is preparing the Guidance Manual for the Development of Industrial Pretreatment Permits to provide training in the development of wastewater discharge permits to Control Authorities required to implement a local pretreatment program. It is designed for new permit writers, but may also serve as a refresher for experienced permit writers.

The manual assumes the Control Authority has selected to regulate its industrial users (IUs) by means of a wastewater discharge permit system. It focuses on elements of the permit process which are common to any Control Authority using this procedure, with particular emphasis on the more difficult steps. The guidance addresses establishment of a permitting strategy, IU information collection and verification, drafting permit language (including determining discharge limits, monitoring, and reporting requirements).

The guidance manual will be mailed directly to all pretreatment POTWs, States, and EPA Regions in the late 1987. Control Authorities should not delay issuance of IU permits while this guidance is being developed.

POTW SLUG  
DISCHARGE  
CONTROL  
GUIDANCE

EPA is preparing a guidance manual to assist POTWs in controlling industrial user (IU) slug discharges, including both accidental spills and intentional batch discharges. The guidance will draw upon and update current POTW control practices and guidance issued by EPA on control of industrial discharges, and will assist in implementation of pretreatment regulations currently being developed in response to the Domestic Sewage Study (DSS).

The DSS documented discharges of large quantities of toxic pollutants and hazardous constituents, some portion of which are received at POTWs as a result of slug discharges by IUs. In addition, a recent survey undertaken by the Association of Metropolitan Sewerage Agencies (AMSA) indicated that nearly every respondent has received hazardous wastes at its treatment plants. The most common source cited was spills into sewage systems. Sixty-six percent of AMSA survey respondents have spill response plans, and 82% have prevention and control plans. Given the large quantities of toxics and hazardous constituents received at POTWs, it is apparent that not all of these plans are effective and that improvement of the plans and their implementation is warranted.

The manual will cover methods for improved control of batch discharges via pretreatment permits and sewer use ordinances, as well as spill control plans and measures for IU spill prevention and POTW spill response. Protecting against such slug discharges will help prevent POTW interference and pass through including plant upsets or damage, danger to worker safety or public health, impairment of water quality, sludge contamination, or NPDES permit violations.

The anticipated final issuance date for the manual is Spring 1988. The manual will be distributed to all pretreatment POTWs, State, and EPA Regional personnel, and will be available to other interested POTWs and IUs, as well.

RADIOACTIVE  
MATERIAL  
DISPOSAL TO  
SANITARY  
SEWERS

Some POTWs may be receiving radioactive waste from industrial users utilizing sanitary sewers for disposal. In addition to being regulated by the general and specific prohibitions in the General Pretreatment Regulations, those entities using such materials are regulated by the Nuclear Regulatory Commission (NRC) and, very likely, many States. NRC and States issue licenses and establish disposal alternatives and requirements. 10 CFR Part 20, "Standards for Protection Against Radiation", Section 20.303 establishes the Federal requirement that no licensee shall discharge licensed material into a sanitary sewerage system unless certain conditions are met.

POTWs which receive radioactive waste from licensees may wish to consider periodic review and confirmation of self-monitoring logs kept by the users, and perform analysis of sludge and compost to determine if there are any impacts. If impacts are detected, POTWs may choose to develop radiological monitoring program to address the problem.

EPA REGIONAL/  
HEADQUARTERS  
PRETREATMENT  
PERSONNEL

The following is a list of EPA Regional and Headquarters pretreatment personnel. If, after first contacting the appropriate State pretreatment office, POTWs need further assistance with program development or implementation questions or problems, please contact the EPA Regional office responsible for your State. Should the need of assistance persist, please contact the appropriate individual listed below:

REGIONAL PRETREATMENT PERSONNELPERMITS CONTACTENFORCEMENT CONTACT

Joan Serra EPA Region I JFK Federal Bldg. WCB-2109 Boston, MA 02203 (617) 565-3490	same	Lee Bohme EPA Region VI Allied Bank Tower (6W-PM) 1445 Ross Avenue Dallas, TX 75202 (214) 655-7175	Wren Stenger 6W-EO (214) 655-6470
Ruth Adelman EPA Region II 26 Federal Plaza New York, NY 10278 (212) 264-2911	Pat Durack (212) 264-9826	Lee Duvall EPA Region VII 726 Minnesota Avenue Kansas City, KS 66101 (919) 236-2817	same
Charlene Harrison EPA Region III 841 Chestnut Street 3WM52 Philadelphia, PA 19107 (215) 597-9406	John Lovell (215) 597-6279	Marshall Fischer EPA Region VIII One Denver Place 999 18th Street Denver, CO 80202 (303) 293-1592	same
Al Herndon EPA Region IV 345 Courtland Street, NE Atlanta, GA 30365 (404) 881-2211	same	Keith Silva EPA Region IX 215 Fremont Street (W-5-1) San Francisco, CA 94105 (415) 974-8298	same
Dave Rankin EPA Region V 230 South Dearborn Street Chicago, IL 60604 (312) 353-6111	same	Robert Robichaud EPA Region X Permits Branch (M/S 521) 1200 6th Avenue Seattle, WA 98101 (206) 442-1448	same

HEADQUARTERS- all written requests should be addressed to:

U.S. EPA  
Permits Division (EN-336) or Enforcement Division (EN-338)  
401 M Street, SW  
Washington, DC 20460

PermitsEnforcement

Ed Ovsenuk (202) 475-9529	Richard Kinch (202) 475-8319
Craig Jacobowics (202) 475-9516	Edward Bender (202) 475-8331
Denise Scott (202) 475-9521	Salahdin Abdul-Haqq (202) 382-4373
Chuck Prorok (202) 475-7053	Andy Hudock (202) 382-7745
George Utting (202) 475-7460	David Shedroff (202) 475-8329

NATIONAL  
MEETING

The EPA is considering holding a National Pretreatment Meeting in the second half of 1988 to include participation by POTW, State, and EPA representatives. Such a meeting would last two to three days, would address a broad range of pretreatment implementation, compliance, and enforcement topics, and would allow for substantial participation by State and POTW representatives. EPA solicits your comments regarding the timing, location, format, and content (including specific topics to be addressed) of such a meeting. Please send your comments, and indicate your level of interest in participating in such a meeting, by December 15, 1987 to:

Thomas Laverty, Chief  
Program Section  
Permits Division/OWEP (EN-336)  
401 M Street, SW  
Washington, DC 20460

AVAILABLE  
DOCUMENTS

The documents listed on this request form are available on a limited basis from EPA. To obtain a copy of any of the following documents, please provide your name and address, check the requested document(s), and return the information to:

Chuck Prorok  
U.S. Environmental Protection Agency  
401 M Street, SW (EN-336)  
Washington, DC 20460

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

PRETREATMENT BULLETINS

- \* ☐ Pretreatment Bulletin No. 1 (September 30, 1985)
- \* ☐ Pretreatment Bulletin No. 2 (March 6, 1987)

CATEGORICAL STANDARDS

- ☐ Guidance Manual for Electroplating and Metal Finishing Pretreatment Standards
- ☐ Guidance Manual for Iron and Steel Manufacturing Pretreatment Standards
- ☐ Guidance Manual for Battery Manufacturing Pretreatment Standards
- ☐ Guidance Manual for Nonferrous Metals, Copper, and Aluminum Forming Pretreatment Standards (publication scheduled for late 1987)

GENERAL INFORMATION

- \* ☐ Guidance Manual for Implementing Total Toxic Organic (TTO) Pretreatment Standards
- \* ☐ Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula
- \* ☐ Memorandum: Local Limits Requirements for POTW Pretreatment Programs (August 5, 1985)
- \* ☐ Guidance Manual on the Development of Local Discharge Limitations Under the General Pretreatment Regulations (publication scheduled for late 1987)
- ☐ The National Pretreatment Program (Environmental Regulations and Technology document EPA/625/10-86/005, July 1986)
- \* ☐ Guidance Manual for the Development of Industrial User Permits (publication scheduled for late 1987)
- \* ☐ Guidance Manual for Preventing Interference at POTWs

ENFORCEMENT

- ☐ Pretreatment Compliance Monitoring and Enforcement Guidance (PCME)
- \* ☐ Guidance for Evaluating and Reporting POTW Noncompliance

RCRA

- \* ☐ RCRA Information on Hazardous Wastes for POTWs
- \* ☐ Guidance Manual for the Identification of Hazardous Wastes Delivered to Publicly Owned Treatment Works by Truck, Rail, or Dedicated Pipe

SOFTWARE

- ☐ PCME Software and User's Manual (delivery scheduled for early 1988)
- ☐ PRELIM and User's Manual (EPA's computer model for calculating local limits)

- \* THESE DOCUMENTS HAVE BEEN, OR SHORTLY WILL BE, MAILED DIRECTLY TO ALL POTW, STATE, AND EPA REGIONAL PRETREATMENT PERSONNEL. DUE TO THE LIMITED NUMBER AVAILABLE, PLEASE BE SURE YOU DO NOT ALREADY HAVE A COPY BEFORE MAKING A REQUEST.



United States  
Environmental Protection  
Agency  
Washington, DC 20460

(EN-335)  
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