
PRETREATMENT BULLETIN

JUNE 1989

BULLETIN #6

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On April 14, 1989, Virginia became the 26th state with an approved pretreatment program.

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1989 National Pretreatment Coordinators Meeting

Denver, CO was the site of the 1989 National Pretreatment Coordinators Meeting held by EPA from April 11 through April 13. Over 100 participants including representatives from 35 states, 23 representatives from EPA Headquarters, and 35 representatives from all 10 EPA Regions attended the meeting. For the first time, the meeting was international thanks to attendance by a Canadian representative from the Ontario Ministry of the Environment.

The objectives of the Pretreatment Coordinators Meeting were to exchange information concerning the Pretreatment Program, provide EPA Headquarters with feedback on successes, identify future challenges, and obtain recommendations from EPA Regions and States regarding issues of importance.

The two and one half day meeting consisted of technical presentations, small group discussions, and general meetings of all attendees. Just a few of the topics discussed were PIRT and DSS requirements, enforcement issues in pretreatment, EPA's Pollution Prevention Program, implementation of SNC and RNC for POTWs, regulation of IUs in non-pretreatment cities, and development of a long-term pretreatment program strategy.

As in previous meetings, State coordinators met to discuss issues of particular concern. Later the State coordinators presented their top five issues of concern:

- 1) Sludge technical standards, particularly with regard to the need for additional local limits guidance and the time for POTWs to achieve compliance
- 2) Inadequate staff and staff turnover
- 3) Toxicity testing and the cost of Whole Effluent Toxicity testing for POTWs
- 4) The need for additional technical guidance regarding local limits development for toxic organics
- 5) State Communications Network- an electronic bulletin board for the states

While state coordinators met, EPA Regional and Headquarters representatives met to discuss the need for a revised National Pretreatment Strategy - the first pretreatment strategy was initially developed in 1978 (see 38 Fed.Reg. 30982). EPA hopes that this revised strategy will allow the Agency to better meet the changing needs of the Pretreatment Program.

The National Pretreatment Coordinators Meeting was an excellent opportunity for EPA and the States to look back at program achievements. Attendees also looked forward to future challenges which include increasing POTW effectiveness in implementation and enforcement of pretreatment standards and requirements, continued improvement in the oversight process, development of more comprehensive NPDES permits, and documentation of pretreatment successes. The 1989 National Pretreatment Coordinators Meeting provided a chance for participants to assess current issues and move toward future goals.

FYI...



Pretreatment Awards- This year the Office of Water is adding a new approach acknowledging the efforts of POTWs to implement and enforce approved pretreatment program requirements. EPA is developing Pretreatment Excellence Awards to acknowledge exemplary pretreatment

programs. These awards will be modeled after the Operation and Maintenance Awards and the Beneficial Sludge Use Awards given annually by the Office of Water. The goal of the awards is two-fold: to recognize POTWs for outstanding efforts in the area of pretreatment, and to heighten overall public awareness and support of local wastewater treatment-related programs.

EPA Regions and States have been asked

to nominate POTWs they believe to be operating exemplary pretreatment programs. After screening nominations at EPA Headquarters, EPA will notify POTWs of their nomination and ask them to submit an awards application which includes information that an Awards Committee (comprised of pretreatment experts from EPA Headquarters, EPA Regions, and States) will use to evaluate the local programs.

The Awards Committee will choose winning POTWs in four size categories based on actual flow:

- 1) 0 to 2.00 million gallons per day (mgd)
- 2) 2.01 to 5.00 mgd
- 3) 5.01 to 20.00 mgd
- 4) Greater than 20.01 mgd

EPA will notify winning POTWs of their selection in August 1989 and present the awards during the Water Pollution Control Federation's annual national conference in October, 1989. One representative from each of the first place POTWs will be invited to attend the WPCF Conference in San Francisco as a guest of EPA.

ENFORCEMENT UPDATE

Pretreatment Enforcement Initiative- EPA and the States are now in the process of targeting POTW candidates for enforcement actions to address failure to adequately implement approved local pretreatment programs. This national pretreatment enforcement initiative began with a February 1989 memorandum signed by Edward Reich, Acting Assistant Administrator for the Office of Enforcement Compliance and Monitoring, and James Elder, Director of the Office of Water Enforcement and Permits. In this memorandum, Regions were asked to identify potential enforcement candidates, to request state participation, and to begin taking appropriate enforcement action (civil referrals or administrative penalty actions) against each of these POTWs.

EPA anticipates that this enforcement initiative will be larger in magnitude than those initiatives used in 1985 and 1986 to address failure to develop approvable local pretreatment programs.

The initiative is part of a continuing effort to ensure that appropriate enforcement action is taken to address POTW failure to implement approved local pretreatment programs. It is anticipated that a national press release providing additional details will be available in September 1989.

Pretreatment Compliance Monitoring and Enforcement Summary Report-- The Enforcement Division of the Office of Water Enforcement and Permits is currently in the process of compiling a Pretreatment Compliance Monitoring and Enforcement Summary Report. This summary will provide analyses of pretreatment data on industrial users, POTWs, States, and EPA. This data is obtained primarily from the Pretreatment Permits and Enforcement Tracking System (PPETS), the national pretreatment data tracking system, which contains information obtained by EPA Regions and States during pretreatment audits, pretreatment compliance inspections, review of annual reports and other sources.

The summary will include graphs, tables, and accompanying text related to such information as issuance of control mechanisms, significant noncompliance rates of significant industrial users (SIUs), inspection of SIUs, enforcement actions taken by POTWs against SIUs, publication of significant violators, and technical analysis for local limits.

A draft version of this summary will be transmitted to EPA Regions and certain States for their review and comment in July 1989. Public release of the summary is planned for September 1989.

Sludge Enforcement Strategy- In response to the statutory mandate in section 405(d) of the Clean Water Act of 1987, EPA proposed technical regulations outlining disposal/use practices and pollutant standards for municipal sludge at 54 Fed. Reg. 5746, Feb 6, 1989. EPA is in the process of evaluating potential enforcement responses to the requirements set forth in proposed Part 503 sludge regulations, and gathering information on existing sludge permits in order to identify and analyze enforcement issues related to sludge. This information will be used by EPA to develop a sludge en-

forcement strategy which will be in place by the time the technical regulations are promulgated in final form.

The enforcement strategy will cover the following areas: assessing the effect of the sludge regulations on EPA and State inspection procedures; developing a definition of SNC for sludge violations; procedures for reporting SNC violations on the QNCR; and assessing compliance with Best Professional Judgement and other existing sludge limits. This strategy is due to be completed by the end of FY89.

Koppers Company Pays \$950,000 to Settle Clean Water Act Case Brought By U.S. EPA- On October 12, 1988, Koppers Company, Inc., a Fortune 500 company, agreed to pay a civil penalty of \$950,000 to the United States to settle a Clean Water Act enforcement action brought against the Company by U.S. EPA. The settlement order, signed by U.S. District Court Judge Richard B. McQuade, in Toledo, Ohio, represents the largest penalty assessed for violations of the Clean Water Act pretreatment standards at a single facility. This penalty recovers more than the economic benefit that Koppers Company may have obtained from its noncompliance.

The complaint, filed in 1987, alleged that Koppers Company, while the owner of an iron and steel coke plant in Toledo, Ohio, violated pollutant discharge limitations and reporting requirements promulgated under the Clean Water Act. Specifically, U.S. EPA alleged that Koppers Company discharged ammonia, phenol, and cyanide to the local Toledo sewage treatment plant for almost two years in violation of the categorical pretreatment standards and requirements for iron and steel manufacturing, cokemaking subcategory, 40 C.F.R. section 420.15(b). Koppers, by the terms of the settlement, did not admit any of the violations alleged by U.S. EPA. Koppers sold its Toledo coke plant in May 1987 to Toledo Coke Corporation. The case against Toledo Coke is pending.

Ocean Spray Cranberries, Inc. Fined- After discharges with very low pH caused interference with proper operations at the receiving POTW, Ocean Spray Cranberries, Inc. was warned repeatedly of the need to pretreat its wastes properly. As a result of a criminal enforcement action for negligent/willful violations, Ocean Spray Cranberries, Inc. was fined \$400,000 on December 20, 1988 after pleading guilty to 20 misdemeanor counts for pre-

Regulation of Pulp and Paper Mill Dioxin Discharges

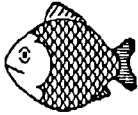
EPA and the States have been evaluating and regulating the discharge of dioxin from pulp and paper mills that use chlorine to bleach chemical pulps. There are 104 of these mills in the United States; eight are indirect dischargers.

Numerous data on the levels of dioxin in effluent, sludge and pulp from these mills have been collected as part of an USEPA/Paper Industry Cooperative Dioxin Study. Data regarding levels of dioxin in fish have been collected as part of the National Bioaccumulation Study. In addition, various Regions and States have been conducting additional ambient water sampling around a number of these mills.

On August 9, 1988, the Office of Water issued the Interim Dioxin Strategy for the Regulation of Pulp and Paper Mill Dioxin Discharges to the Waters of the United States. Comments on the strategy and its implementation are welcome. However, the strategy should be used now. The goal of the interim strategy is to eliminate the presence of dioxin in discharges from pulp and paper mills to the waters of the United States. The interim strategy calls for (1) aggressive standards for dioxin applicable to all water bodies where mills using chlorine bleach processes are discharging; (2) collection of data on each of the 104 affected mills, including dioxin levels in the pulps, effluents, sludges; (3) detailed technical evaluation of wastewater treatment technologies and/or in-process changes to reduce or eliminate the presence of dioxin in wastewater discharges; and (4) issuance of NPDES permits that regulate and require monitoring for dioxin, examine effluent toxicity and provide for modification to tighten controls consistent with the final strategy and the requirements of

(continued on p. 4)

treatment violations and 1 misdemeanor count for direct discharge to wetlands. In addition, Ocean Spray was ordered to buy a sludge press for the Town of Middleboro's sewage treatment plant, as restitution for damages caused to the POTW by Ocean Spray's violations.



REGULATORY UPDATE

Sludge Regulations- The 1987 amendments to the Clean Water Act (CWA) require that permits issued to treatment works contain sludge standards. EPA proposed technical standards for pollutants of concern in sludge for five major use or disposal methods (40 CFR Part 503) on February 6, 1989 (54 Fed.Reg. 5746).

The public comment period on the proposed sludge standards will close August 7, 1989.

EPA will hold public hearings and workshops to discuss the proposed standards as follows:

Workshops

May 23-24 Philadelphia, PA

May 31- June 1 Seattle, WA

Public Hearings

July 6 Washington, DC

July 13 Boston, MA

July 18 Chicago, IL

July 20 San Francisco, CA

Further information about the workshops and public hearing may be obtained by calling EPA's Sludge Hotline at (617) 648-7898 or 7899 or Mark Morris at (202) 475-7312.

On May 2, 1989, EPA published final rules for incorporating sludge conditions in NPDES permits and for approving State Sludge Management programs (54 Fed.Reg. 18716). For further information contact Debora Clovis, U.S. EPA, Permits Division (EN-336), 401 M St. SW, Washington, DC 20460 Tel. (202) 475- 7052.

The 1987 CWA amendments also state that, prior to development of the Part 503 technical standards, the Administrator shall put sludge con-

the Clean Water Act. A final strategy should be issued after review of comments received and the results of the EPA/Paper Industry Cooperative Study which is under way. The settlement and agreement in the EDF/NWF v. EPA dioxin lawsuit requires the strategy to be issued by April 1990.

On October 20, 1988, EPA issued data from a dioxin treatability study and provided suggestions for interim control measures for regulating dioxin dischargers from pulp and paper mills.

On March 15, 1989, EPA issued Guidance for section 304(l) Listing and Permitting of Pulp and Paper Mills which describes three lists used to organize information on dischargers: the "a" or "long" list of all impaired waters, the "b" or "short" list of impaired waters impacted by certain point sources, and the "c" list of facilities impacting waters on the "b" list. This guidance indicated that receiving waters for every mill or associated POTW should be listed on the section 304(l)(1)(B) "short list" if 2,3,7,8-TCDD is detected in fish (whole or fillet) (unless the State has adopted criterion for the pollutant which establishes a risk level less stringent than 10^{-6} and the State's criterion is not violated) or if the 2,3,7,8-TCDD data for the effluent indicate, after use of appropriate procedures specified by the State regarding mixing zones and risk levels, that there will be a violation of water quality standards. Chlorine bleaching pulp mills or associated POTWs should be identified on the 304(l)(1)(c) list for each water identified on the (B) list. The Guidance goes on to indicate that the Permits for those facilities on the (C) list should contain (1) a calculated water quality-based permit limit for 2,3,7,8-TCDD, (2) a statement in the permit that the detection level is the threshold for compliance/non-compliance determinations and (3) a statement in the permit citing the analytical protocol set out in Appendix C of the USEPA/Paper Industry Cooperative Screening Study.

For more information on the permitting of these facilities, please contact Laura Phillips at (202) 475-9532.

ditions in permits issued to POTWs or take other appropriate action to protect public health and the environment. To implement this requirement, EPA has developed a "Strategy for Interim Implementation of Sludge Requirements in Permits Issued to POTWs." The draft strategy, which was made available for public comment, is undergoing revision in response to public comments and to reflect new regulation. EPA expects to issue the revised guidance this summer.

In addition, EPA has prepared two draft guidance documents to help permit writers in developing interim sludge conditions for POTW permits. The first is the "Guidance for Writing Case-by-Case Requirements for Municipal Sludge, Sept. 1988." This guidance is now being revised in response to comments received and is scheduled for availability at the end of this fiscal year. Limited quantities of the September 1988 draft are still available by contacting Robert Goo at (202) 382-6961.

The second draft guidance is the "POTW Sludge Sampling and Analysis Guidance Document, June 1988," which is also undergoing revision in response to comments and is expected to be finalized this summer. For further information or copies of the draft, contact Cristina Morrison at (202) 475-7052.

Storm Water Regulations- On December 7, 1988, pursuant to the Water Quality Act of 1987, EPA proposed regulations (53 Fed. Reg. 49416), for permit application requirements for storm water discharges from medium municipal separate storm sewers serving a population of 100,000 or more, large municipal separate storm sewers that serve a population of 250,000 or more, and storm water discharges associated with industrial activity.

A 90-day comment period ended on March 7, 1989. The proposal requested comments on several issues including the appropriate definition of municipality, sampling procedures, and specific industries covered by the regulation. EPA is currently reviewing 450 comments submitted by a variety of industries, municipalities, and state agencies. EPA anticipates that final regulation

will be promulgated in early 1990.

Copies of the proposal can be obtained by contacting Tom Seaton, Kevin Weiss, or Mike Mitchell, Permits Division (EN-336), U.S. EPA, 401 M St. SW, Washington DC, 20460. Tel. (202) 475-9518.

GUIDANCE UPDATE



Guidance Manual for Control of Slug Loadings To POTWs- Slug loadings are defined as any pollutant discharges which violate the specific prohibitions under 40 CFR 403.5(b), including: (1) fire or explosion, (2) corrosion, (3) obstruction, (4) interference, or (5) excessive heat. Under 40 CFR 403.12(f), all categorical and noncategorical industrial users are required to notify the POTW immediately of slug loadings.

The Report to Congress on the Discharge of Hazardous Wastes to Publicly Owned Treatment Works (called the Domestic Sewage Study) documented the problem of slug loadings of toxic pollutants and hazardous constituents by industrial users (IUs) and recommended expansion of pretreatment controls. The study acknowledged that categorical industrial pretreatment standards, locally -derived numerical limits, and reporting requirements were not always effective in handling accidental spills or irregular high strength batch discharge which may be received at the POTW as slug loadings.

This guidance manual was developed by EPA to aid all POTWs (not just those that have been required to establish federally-approved pretreatment programs) in developing and implementing specific programs and measures to control IU slug loadings. Technical guidance is provided for imposing a range of slug loading control measures on IUs and, where prevention fails, engaging in remedial measures at the POTW.

By supplementing existing or future categorical standards and numerical local limits, slug control measures will help reduce influent loadings overall, including loadings of toxic pollutants and hazardous constituents. In addition, slug controls can be useful to help POTWs comply with NPDES effluent limitations on specific chemicals or whole effluent toxicity.

A limited number of copies have been distributed to EPA Regions and further distribution is planned.

Enforcement Response Guide- EPA is completing development of an enforcement response guide. The manual entitled, Guidance for Developing POTW Pretreatment Enforcement Strategies, is intended to supplement the Domestic Sewage Study Proposed Rule (November 23, 1988) which proposes to amend 40 CFR 403.8(f) to require all POTWs with pretreatment programs to develop enforcement response plans describing how POTWs will investigate and respond to instances of noncompliance, including time frames within which the responses will take place.

The manual will provide municipal pretreatment personnel with guidance for developing effective enforcement strategies. The guidance will present the advantages, disadvantages and proper use of enforcement remedies and responses which in EPA's experience, are typically available to municipalities. The enforcement response guide assists in the selection of both initial and follow-up enforcement responses by identifying appropriate enforcement response time frames for carrying out these actions. To further guide Control Authority personnel, the manual includes a model enforcement response guide illustrating these concepts. Finally, the manual contains a lengthy analysis of each of the common enforcement remedies and responses with the advantages and disadvantages of each tool described as well as recommendations on how to use them. Sample documents, which Control Authorities may use as appropriate, are also included.

The Agency believes that the process of developing these plans will be very valuable and that such plans will make it easier for EPA to determine whether a POTW is complying with its pretreatment implementation requirements for enforcement.

The guidance manual is anticipated to be available in the Fall of this year. This manual will complement an earlier document prepared by EPA entitled, Pretreatment Compliance Monitoring and Enforcement Guidance (PCME) (July 1986).

Additional Local Limits Guidance- As a supplement to the 1987 Guidance Manual on the Implementation and Development of Discharge Limitations Under the Pretreatment Program (the Local Limits Manual) EPA is now preparing additional local limits guidance which it expects to be available later this year. The additional guidance includes:

1) The Domestic/Commercial Loading Report- This report examines sampling results based on domestic and commercial background sources and will serve as a source of additional data that can be used as comparison data when developing local limits. Although the Local Limits Manual provides literature data for domestic loadings, this report identifies several additional types of discharges as significant sources of loadings. Data has been compiled on radiator shops, laundries, septic haulers, landfill leachates, photo processors, hospitals and car washes.

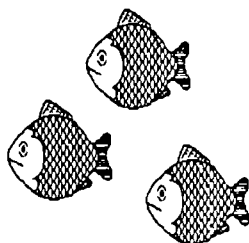
2) Removal Efficiency Estimation for Local Limits Development- The 1987 Local Limits Manual presents the concept of the decile approach as an alternative method for calculating removal efficiencies. This guidance elaborates on the concepts presented in the guidance manual and answers questions not addressed there. The study also provides a "worksheet" approach to decile calculations which should allow POTWs to follow step-by-step procedures in calculating removal efficiencies based on deciles.

City Attorneys' Workshop- In a continuing effort to improve the implementation of the National Pretreatment Program, EPA is currently developing a workshop for local city attorneys. This workshop is designed to: (1) facilitate and enhance coordination between the POTW personnel and municipal attorney; and (2) to educate the local attorney in bringing administrative and civil enforcement cases against noncompliant industrial users.

The substantive content of the workshop will include: an overview of the federal pretreatment program; a review of a typical sewer

use ordinance, including an analysis of common obstacles to enforcement which occur in the ordinance; administrative enforcement procedures and techniques; civil enforcement issues and procedures, including admissability of evidence and procedures for bringing cases; and model pleadings for civil and administrative enforcement.

The overall goal of the workshop is to promote institutional coordination between the POTW and city attorney's office and to encourage a more active role on the part of the city attorney in the enforcement process.



UPCOMING EVENTS

Workshops and Hearings regarding proposed sludge technical regulations, see p. 4

Workshop on Toxic Air Pollutants and POTWs
Washington, D.C., July 10 & 11, 1989.

Contact: Atal Eralp, USEPA, (202)382-7369

Basic NPDES Permit Writers' Course
Hartford, CT., August 7-11, 1989

Contact: Roxanne Gentry,
ERC Environmental, (703) 471-5550

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