23rd Annual EPA NERPCA New England Industrial Pretreatment Coordinator's Conference





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Understanding your pretreatment requirements in your NPDES permit



What is NPDES?

National Pollutant Discharge Elimination System



Who issues the permit?

New England:

EPA – New Hampshire

State - Vermont, Connecticut, Maine and Rhode Island

EPA and State - Massachusetts



NPDES Permit Application Industrial User Information

- 40 CFR 122.21(j)(6)
- (i) Number of significant industrial users (SIUs) and non-significant categorical industrial users (NSCIUs), as defined at 40 CFR 403.3(v), including SIUs and NSCIUs that truck or haul waste, discharging to the POTW;

\$EPA	b. Categorical pretreatment standardsYesNo If subject to categorical pretreatment standards, which category and subcateg
 https://www.epa.gov/npdes/n pdes-application-forms 	a. Process wastewater flow rate. Indicate the average daily volume of proce per day (gpd) and whether the discharge is continuous or intermittent. gpd
waste, discharging to the POTW;	F.5. Principal Product(s) and Raw Material(s). Describe all of the principal production discharge. Principal product(s): Raw material(s): F.6. Flow Rate.

PART F. INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES All treatment works receiving discharges from significant industrial users or which receive RCRA, CERCLA, or other remedial wastes muscomplete Part F. GENERAL INFORMATION: [5.1. Pretreatment Program. Does the treatment works have, or is it subject to, an approved pretreatment program? [7.2. Number of Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs). Provide the number of each of the following type of industrial users that discharge to the treatment works. [7. Number of Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs). Provide the number of each of the following type of industrial users that discharge to the treatment works. [7. Number of CIUs.] [7. Number of Industrial User Information. Provide the name and address of each SIU discharging to the treatment works, copy questions F.8 through F.8 and provide the information requested for each SIU. [7. Significant Industrial User Information. Provide the name and address of each SIU discharging to the treatment works. Submit additional pages as necessary. [7. Name: [7. Principal Product(s) and Raw Material(s). Desorbe all of the principal processes and raw materials that affect or contribute to the SIU's discharge. [7. Principal product(s)] [7. Principal product(s)] [7. Pretreatment (significant industrial processes wastewater discharged into the collection system in gallons per day (gpd) and whether the discharge is continuous or intermittent. [7. Pretreatment Standards. Indicate whether the SIU is subject to the following: [7. Pretreatment Standards. Indicate whether the discharge is continuous or intermittent. [7. Pretreatment Standards. Indicate whether the SIU is subject to the following: [7. Pretreatment Standards. Indicate whether the SIU is subject to the following: [7. Pretreatment Standards. Indicate whether the SIU is su	FAC	ILITY NAME AND PERM	IT NUMBER:				Form Approved 1/1 4/00 GMB Number 2040-0080			
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• • — —		a. Local limits		Yes	No					
If subject to categorical pretreatment standards, which category and subcategory?										

What to look for?

- Have you ever seen you NPDES permit?
- Pretreatment requirements:
 - Development of an industrial pretreatment program
 - Submit Annual Report
 - Perform Local Limit Evaluation
 - Perform Local Limit Development (if applicable)
 - Develop/Revise Sewer Use Ordinance (if applicable)
 - Develop/Revise Enforcement Response Plan (if applicable)
 - Provide Notification to EPA/State on industrial users
 - Carry out the program (ie. Permits, inspections, monitoring etc.)
 - What else?????



PFAS DRAFT Language in ALL NPDES Permits (MA)

6 PFAS compounds to be monitored

Perfluorohexanesulfonic acid (PFHxS)

Perfluoroheptanoic acid (PFHpA)

Perfluorononanoic acid (PFNA)

Perfluorooctanesulfonic acid (PFOS)

Perfluorooctanoic acid (PFOA)

Perfluorodecanoic acid (PFDA)

- Influent, Effluent, and Sludge Monitoring (1/quarter)
 - This reporting requirement for the above listed PFAS parameters takes effect 6 months after EPA's multi-lab validated method for wastewater/biosolids is made available to the public on EPA's CWA methods program website
 - Composite samples and report only



Beginning 6 month's after an EPA approved method....

The Permittee shall commence annual sampling of the following types of industrial discharges into the POTW:

- Platers/Metal Finishers
- Paper and Packaging Manufacturers
- Tanneries and Leather/Fabric/Carpet Treaters
- Manufacturers of Parts with Polytetrafluroethlylene (PTFE) or teflon type coatings (i.e. bearings)
- Landfill Leachate
- Centralized Waste Treaters
- Contaminated Sites
- Fire Fighting Training Facilities
- Airports
- Any Other Known or Expected Sources of PFAS



Where can I find my NPDES permit?

https://www.epa.gov/npdespermits/npdes-water-permitprogram-new-england



