

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



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;
- <https://www.epa.gov/npdes/npdes-application-forms>

FACILITY NAME AND PERMIT NUMBER: _____

Form Approved 1/14/00
OMB Number 2040-0080

SUPPLEMENTAL APPLICATION INFORMATION

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 must complete Part F.

GENERAL INFORMATION:

F.1. Pretreatment Program. Does the treatment works have, or is it subject to, an approved pretreatment program?
 Yes No

F.2. Number of Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs). Provide the number of each of the following types of industrial users that discharge to the treatment works.

a. Number of non-categorical SIUs. _____

b. Number of CIUs. _____

SIGNIFICANT INDUSTRIAL USER INFORMATION:

Supply the following information for each SIU. If more than one SIU discharges to the treatment works, copy questions F.3 through F.8 and provide the information requested for each SIU.

F.3. Significant Industrial User Information. Provide the name and address of each SIU discharging to the treatment works. Submit additional pages as necessary.

Name: _____

Mailing Address: _____

F.4. Industrial Processes. Describe all of the industrial processes that affect or contribute to the SIU's discharge.

F.5. Principal Product(s) and Raw Material(s). Describe all of the principal processes and raw materials that affect or contribute to the SIU's discharge.

Principal product(s): _____

Raw material(s): _____

F.6. Flow Rate.

a. Process wastewater flow rate. Indicate the average daily volume of process wastewater discharged into the collection system in gallons per day (gpd) and whether the discharge is continuous or intermittent.
_____ gpd (continuous or intermittent)

b. Non-process wastewater flow rate. Indicate the average daily volume of non-process wastewater flow discharged into the collection system in gallons per day (gpd) and whether the discharge is continuous or intermittent.
_____ gpd (continuous or intermittent)

F.7. Pretreatment Standards. Indicate whether the SIU is subject to the following:

a. Local limits Yes No

b. Categorical pretreatment standards 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 Polytetrafluoroethylene (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/npdes-permits/npdes-water-permit-program-new-england>

Questions?

Justin Pimpare
EPA New England
Pimpare.justin@epa.gov
(617)918-1531