

# 25<sup>th</sup> Annual NERPCA Workshop

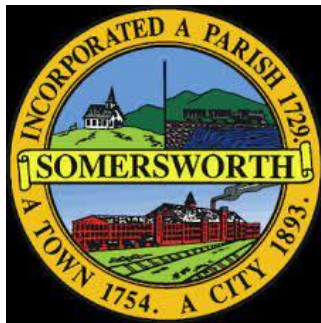
## Pretreatment 102

October 24, 2023



# Presenters

Stephanie Rochefort  
WWTF Chemist  
Somersworth WWTF  
Somersworth, NH



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Compliance Supervisor & State  
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Management



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Providence, RI



# Agenda

Where to Find New Companies

Information gathering

Education

Company Evaluation

Permit Writing

Company Next Steps

Program Next Steps

Exercises



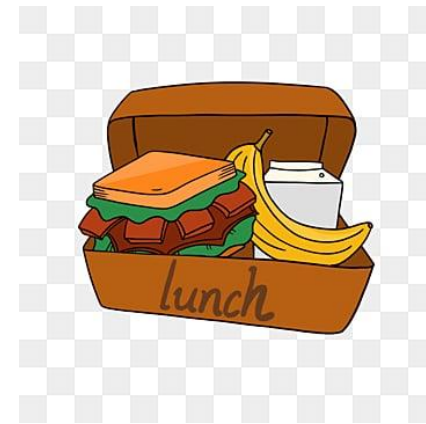
# Housekeeping

Exits

Restrooms

Silence Cell Phones

Lunch Break



# How to Find New Companies

- Industrial User Surveys
  - Community outreach
  - Social Media searches
  - Driving through district
  - Water Usage / billing statements
  - Codes / Building permits
  - Community Development
  - Local Chamber of Commerce
- Sewer Connection Requests
- Agency referrals (Cities/Towns, Taxation, DOH)
- Sometimes companies contact you



# **New Company – What to do**

**What do you do when you find a new company?**

# New Company – What to do

Need to obtain essential information

- Company name and address
- Additional Corporate Relationships
- Company officials
- Date established at location
- Date regulated processes began
- Products/Services/Applicable SIC/NAICS
- Water using process operations
- Pretreatment
- Chemicals onsite
- Safety Data Sheets
- Technical Data
- Other Environmental Permits
- Pretreatment
- Chemicals onsite
- Types of waste

# New Company – What to do

- How do you get the information
- Applications
- Baseline Monitoring
- Process Operation & Pretreatment System Plans
- Inspections
- Meeting with the company
- Review the company's website
- Review social media
- Similar Industries in your service area

## User Education

- Explain who you are
- Review your Sewer Use Ordinance (SUO)
- Explain the permitting process
- Let them know what will be required by the permit
- Answer questions



# New Company – What to do

## User Evaluation

Is the company a Significant Industrial User and/or Categorical Industrial User?

Is the company a new (PSNS) or existing (PSES) source?

What classification of user does the company fall under?

What is the impact of the process operations on the discharge?

Does the company have a regulated process wastewater discharge permit?

# **EXERCISE #1 -**

## **Permit Preparation**

# Permit Writing

Must comply with 40CFR403 and SUO requirements

- Permittee information
- Categorical Reference
- Local and Categorical Limits
- Permitted and Prohibited discharges

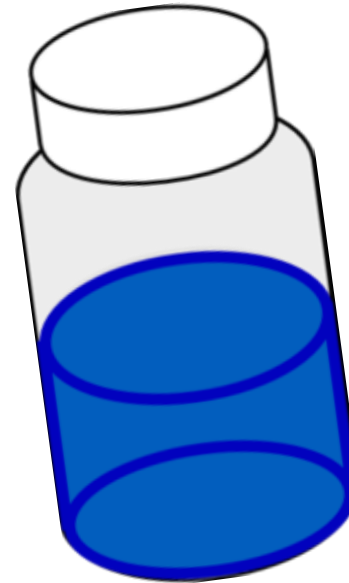


# Permit Writing

**What information do you include when writing a permit?**

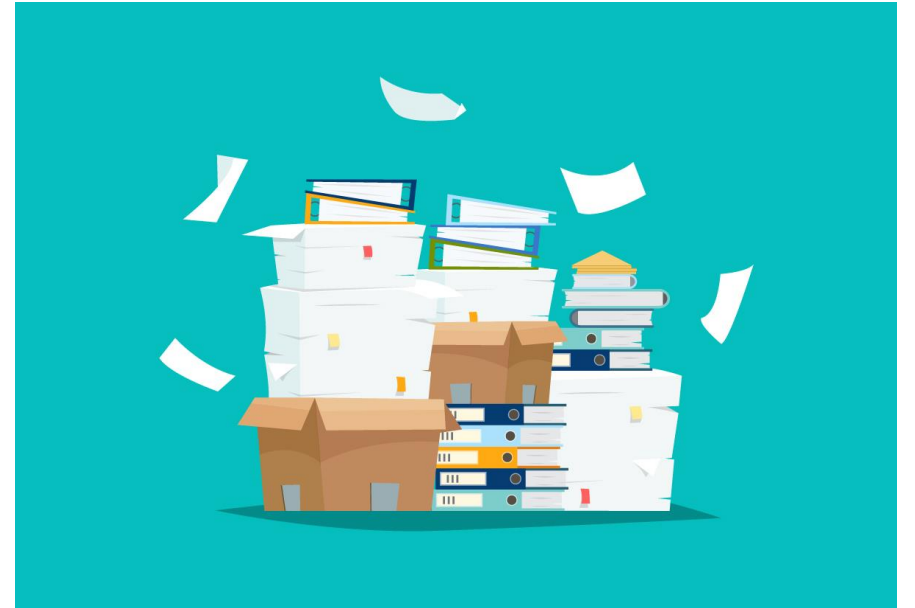
# Permit Writing

- Sampling Location
- Sampling requirements
  - Frequency
  - Parameters
  - When to submit
  - What to submit
  - What to do when a result is out of compliance
  - Resampling requirements



# Permit Writing

- Record keeping
- Notification types
- Making changes
- Emergency
- Spill Control Plan
- Toxic Organic / Solvent Management Plan (TOSMP)



# Permit Writing

- Right of Entry
- Permittee's responsibility for permit violations
- Revocation or Suspension of permit
- Civil and Criminal Liability
- Duty to comply
- Removed substances
- Permit modification/renewal
- Jurisdiction

# Permit Issuance

- Need written confirmation the permit has been received
  - Certified Mail – Return Receipt Requested
  - Hand Delivered and signed by company representative
- Company is given a limited time to contest any requirements

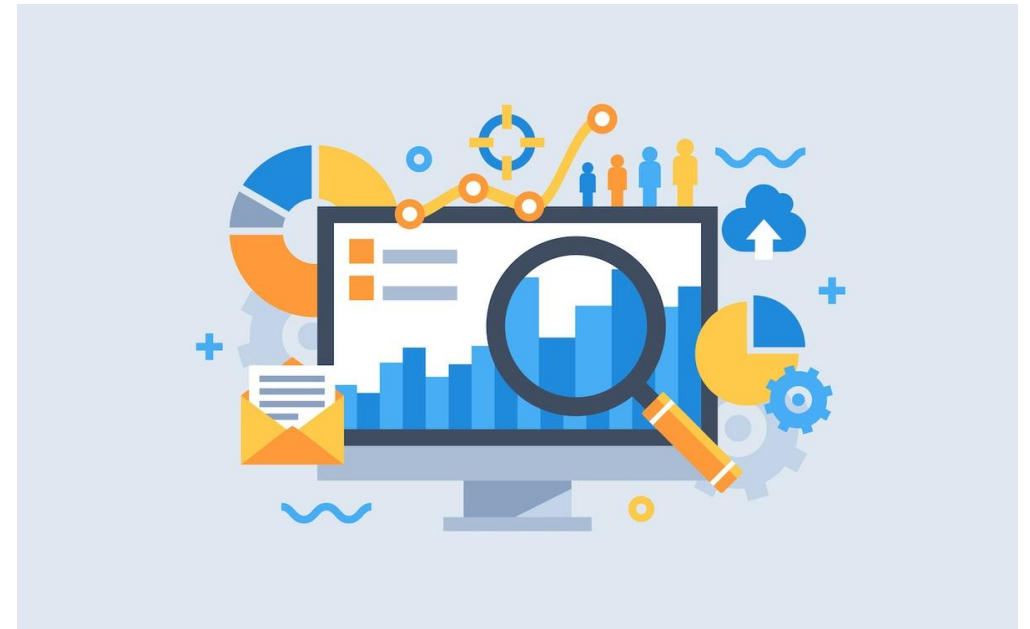
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Signature <b>X</b> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to:	B. Received by (Printed Name)	C. Date of Delivery
2. Article Number <i>(Transfer from service label)</i>	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



# Next Steps – Company Regulation

- Enforcement Response Plan (ERP)
- Receiving user data
  - Ensure all required documents are included
  - Evaluate for compliance with limits – if out of compliance issue NOV
  - If not received by due dates in permits issue NOVs
- Review Spill Control and TOSMP
- Respond to user issues



# Next Steps – Company Regulation

- Conduct inspections of the facility
  - Announced or unannounced
  - Annual inspection (SIU/CIU)
- Document the inspection (checklist or memo)
- Issue findings to company
  - Letter outlining any requirements
  - Notice of Violation
- Escalated Enforcement Action



# **Exercise #2**

## **Conducting Inspections**

# Next Steps – Pretreatment Program

- Ensure compliance with your NPDES permit and 40CFR403, state Pretreatment regulations
  - Annual inspections and sampling conducted within 12 month period
  - Compliance with your Enforcement Response Plan
- Evaluate Significant Non-Compliance and publish findings
- Prepare and submit the Pretreatment Annual Report



# Pretreatment Annual Report Requirements

- Updated list of industrial users by category
  - Baseline monitoring reports
  - Compliance status
  - Monitoring reports
  - Categorical Standards
  - Local limits
- Summary of compliance and enforcement activities
  - SIUs sampled and inspected including dates
  - Compliance schedules
  - Administrative Orders
  - Criminal or Civil Suits
  - Administrative Penalties

# Pretreatment Annual Report Requirements

- List of companies in SNC
- Description of program effectiveness
- Summary of pollutant analytical results
  - Influent
  - Effluent
  - Sludge
  - Toxicity
  - Bioassay

# Pretreatment Annual Report Requirements

- Detailed description of interference and pass-through
- Description of all investigations of interference and pass-through
- Description of monitoring, sewer inspections
- Description of actions being taken to reduce the incidence of significant violations
- Date of the latest adoption of local limits and an indication as to whether the agency is under State or Federal compliance schedule which includes a local limits revision

# Other Topics You May Want to Discuss

- Dental Discharges
- Restaurants and other FSEs
- Laundries
- Automotive Discharges



What would you like to ask us?

