

# Lessons Learned and How to Develop an IPP

# Communicate with Regulators

The background features abstract, overlapping geometric shapes in various shades of green, ranging from light lime to dark forest green. These shapes are primarily located on the right side of the slide, creating a modern, layered effect. The text is centered on the white background.

# What's in Your NPDES Permit?

Aka...what do you really  
need to do???

# Who Must Develop a Local Pretreatment Program?

- ▶ POTWs with total design flow > 5 MGD, and
  - ▶ Receives pollutants from industrial users that pass through or interfere or
  - ▶ Receives discharges from categorical industrial users (discussed later in the presentation).

***Learn more in: 40 CFR 403.8(a)***

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## Who Must Develop a Local Pretreatment Program?

- ▶ POTWs less than 5 MGD if the Approval Authority (state or EPA) determines that a program is required to prevent pass-through and interference - or has significant industrial contribution or chronic NPDES violations due to non-domestic discharges.
- ▶ NPDES states may assume responsibility [Learn more in: 40 CFR 403.10\(e\)](#)

## Components of a Technically and Legally Defensible Pretreatment Program

- ▶ Legal Authority to implement and enforce program's requirements (as derived from State law that confers federal legal authority on Control Authority)
- ▶ Technically-based Local Limits
- ▶ Adequate funding and staffing for continued program implementation/execution

***Learn more in: 40 CFR 403(f)***



**Prevent this**



# IPP Elements

Element 1: Legal Authority

Element 2: IWS

Element 3: Local Limits

Element 4: Procedures for compliance

Element 5: Enforcement Response Plan

Element 6: Program Organization & Funding

# Master List of Industrial Users

Existing sewer files & accounts

Water use & billing records

USEPA & VTDEC regulatory databases

Online internet searches

GIS records

Windshield survey

Client's staff knowledge & other pertinent sources