

# Lessons Learned and How to Develop an IPP

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# Communicate with Regulators

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# What's in Your NPDES Permit?

## 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)***

## 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)***