

27th Annual NERPCA Workshop

Advanced Pretreatment 101

October 21, 2025



Housekeeping

Exits

Restrooms

Silence Cell Phones

Snack Break

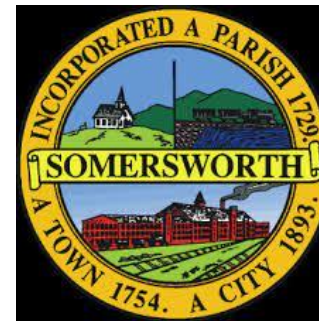


Presenters

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Pretreatment Manager
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Providence, RI



Stephanie Rochefort
WWTF Chemist
Somersworth WWTF
Somersworth, NH



Agenda

Basics

Where to Find New Companies

Information gathering

Education

Company Evaluation

Permit Writing

Company Next Steps

Program Next Steps

Exercises



Basics of Pretreatment

Objective

Protect treatment plants and their infrastructure from upset and interference due to the introduction of pollutants.

General Pretreatment Regulations - 40CFR403

- ▶ Minimum required in Industrial Pretreatment Programs (IPP)
- ▶ Should be referenced in NPDES permit



Definitions

Pass Through: Discharges which flow through the POTW into the receiving waters which alone or in combination with a discharge(s) from another source and is cause of a violation of the POTW's NPDES permit.

Interference: A discharge which alone or in combination with a discharge(s) from other sources, inhibits or disrupts a POTW's treatment processes, operations, sludge processes (use or disposal) and is a cause of a violation of any requirement the POTW's NPDES permit .

Definitions

Significant Industrial User

- All categorical industrial users (CIU) regardless of flow
- Discharge an average of 25,000 gpd of process wastewater
- Contribute 5% or more of a POTW's average dry weather hydraulic or organic (BOD) capacity
- Have a “reasonable potential” to adversely impact POTW's operation or violate pretreatment standards or requirements

Starting a career with an alleged program

Somersworth constructed a treatment facility in 1972.

By 1984 they were suffering from slugs of industrial waste that caused color, pH swings, grease build-up and high metals content in their biosolids.

In response they updated their sewer use ordinance and began to identify and regulate their industries.

1990 - a new Coordinator

Figure it out...

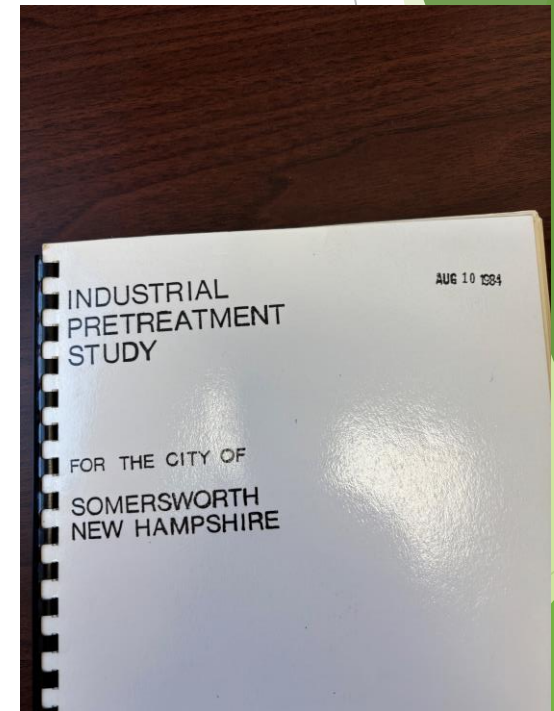


A few years later...

My first audit and I was told that I wasn't following "my program"...WTF?! Apparently, this Industrial Pretreatment Study had been approved as my program!

Only two of the identified industries were still in business and there were several new ones in the City.

What I wasn't following was an outdated inspection and sampling schedule.



Starting Career in an Established Program

- NBC IPP was started in the late 1980s for the Field's Point Facility
- Started in an approved program in 1992 (11 FTEs)
- “Do it because I said so”
- Over 162 SIUs
- Grease Control Program was just beginning (problematic areas)
- Mid 1990s the Bucklin Point Facility was acquired
- Began inspecting and permitting other classifications of users (film/x-ray processing, hospitals, funeral homes, laundromats, boiler facilities, car washes, etc.)
- Mid to late 1990s began a “kinder and gentler” approach
- Began to permit all companies in a category not just companies in problematic areas



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



**SOMERSWORTH
COMMUNITY**
CHAMBER *of* COMMERCE

New Company - What to do

What do you do when you find a new company?

What information do you need?

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 all this information?



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?

Permit Writing

What information do you include when writing a permit?



Permit Writing

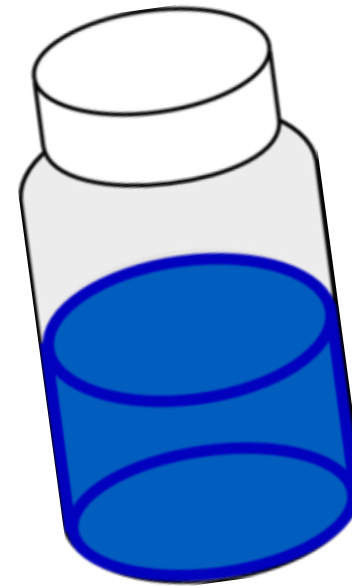
Must comply with 40CFR403 and SUO requirements

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



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

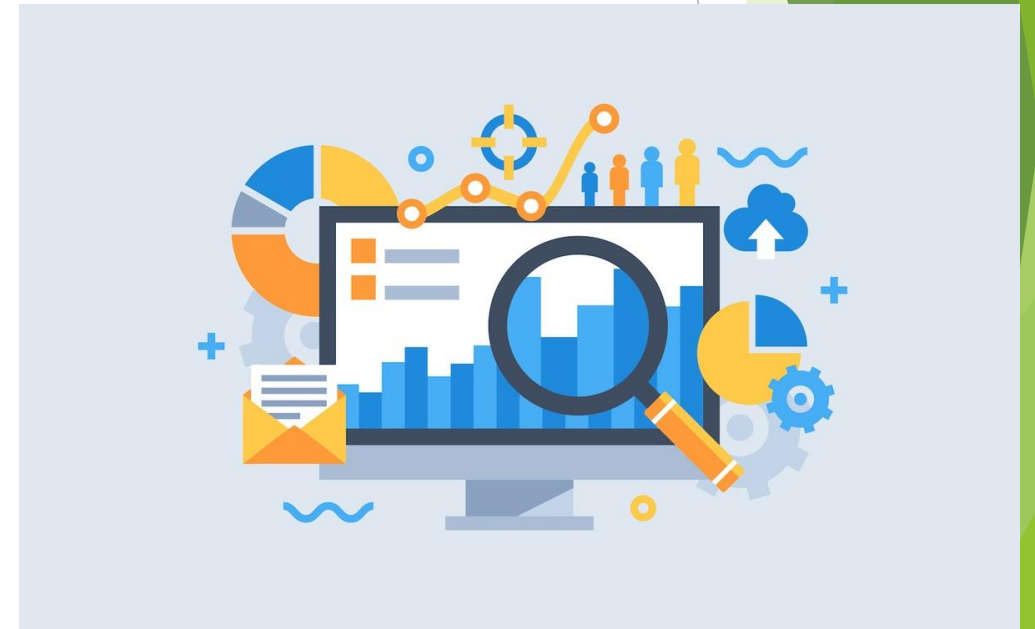
- ▶ Need written confirmation the permit has been received
 - ▶ Certified Mail - Return Receipt Requested
 - ▶ Hand Delivered and signed by company representative
- ▶ Company is given a limited time to contest any requirements

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
■ Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature X ☐ Agent ☐ Addressee	
1. Article Addressed to:		B. Received by (Printed Name)	C. Date of Delivery
		D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
		3. Service Type ☐ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D.	
2. Article Number (Transfer from service label)		4. Restricted Delivery? (Extra Fee) ☐ 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



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

Tips for a Successful Program

- ✓ Know 40CFR403
- ✓ NPDES permit requirements
- ✓ Rules & Regulations / Sewer Use Ordinance
- ✓ Have technically sound Local Limits
- ✓ Enforcement Response Plan
- ✓ Communication with EPA, State, Peers
- ✓ Educate your companies (both permitted and in the process of being permitted)
- ✓ Recognize good players as well as take enforcement action against bad actors

How to keep your program sustainable if you win the lottery

Cross-training

SOPs

An organized paper-filing system

An organized e-filing system

Other Topics You May Want to Discuss

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

What would you like to ask us?

