

# Affects of 62-625 Changes on Pretreatment Programs

Or learning to love the new regulations

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# Overview

- Optional elements available in reg. changes
  - Options affecting CIUs
  - Options affecting SIUs
  - Option affecting no one in FL
- Discuss scenarios where each may reduce burden on industries and control authorities

# Streamlining Rule


Most 62-625 changes adopted from Fed Streamlining Changes

- Intent

- Reduce burden on CA's

- Outcome

- Flexibility - Provides CA many optional options
  - Optional options may reduce program burden on SIUs & CA



Depends on how you run your program

# Optional Options for CIUs

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1. Convert categorical pretreatment standards from concentration to mass
2. Convert pretreatment standards from mass to concentration
3. Waiver for pollutants not present
4. New classes of CIU

# CIU Optional Options

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Option I - Convert categorical pretreatment standards from concentration to mass limits

Current: CIU standards expressed as concentrations, must be written as concentrations in permit.

New: CA may convert mg/L to lbs/day for conservation efforts

# CIU Optional Options

Option I - Convert categorical pretreatment standards from concentration to mass limits

Why?

Scenario: A metal finisher with the following discharge data:

Flow: 0.050 MGD Ave daily Cu effluent: 2.54 mg/L and daily max Cu limit = 3.38 mg/L

Reduces water consumption by 30%

Now: ave. Cu eff = 3.63 mg/L

# CIU Optional Options

Option I - Convert categorical pretreatment standards from concentration to mass limits

Ave. Cu eff = 3.63 mg/L > 3.38 mg/L limit

Lets look at mass:

Before: 1.06 lbs/day

After: 1.06 lbs/day

No increase in pollutant mass



No good deed goes unpunished

# CIU Optional Options

Option I - Convert categorical pretreatment standards from concentration to mass limits

No increase in pollutant mass, and...

Water conservation efforts made, means...

CA could convert concentration limits to mass.



# CIU Optional Options

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**Option 2 - Convert categorical pretreatment standards from mass to concentration limits**

**Current:** Certain categorical industries must express limits as mass in permit.

**New:** CA may default to concentrations used calculate mass limits.

# CIU Optional Options

## Option 2 - Convert categorical pretreatment standards from mass to concentration limits

3 categories require mass based limits.

- OCPSF
- Petroleum refining
- Pesticide chemicals

# CIU Optional Options

## Option 2 - Convert categorical pretreatment standards from mass to concentration limits


Why?

Scenario: An organic chemical manufacturer has a toluene mass limit of 0.21 lbs/day. Monitoring results:

Toluene: 0.05U mg/L

Flow: 1.75 MGD

Use 1/2 MDL



Mass toluene discharged =  $0.025 \text{ mg/L} \times 1.75 \text{ MGD} \times 8.34 = 0.365 \text{ lbs/day}$

# CIU Optional Options

Option 2 - Convert categorical pretreatment standards from mass to concentration limits

$$0.365 \text{ lbs/day} > 0.21 \text{ lbs/day}$$

This option allows you to use default concentration limits:

Toluene: daily max = 0.074 mg/L

monthly ave = 0.028 mg/L

So IU result of 0.05U mg/L, complies w/ daily limit, but cannot verify monthly average compliance.

# CIU Optional Options

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## Option 2 - Convert categorical pretreatment standards from mass to concentration limits

Other reasons to opt for this option:

- IU cannot accurately measure flow
- To verify compliance, CA monitoring results must be converted mass

# CIU Optional Options

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## Option3 - Waiver for pollutants not present

Current: Any IU w/ categorical waste stream must monitor for all pollutants in pretreatment standard

New: IUs can apply for monitoring waiver for pollutants demonstrated as not being present.

# CIU Optional Options

## Option 3 - Waiver for pollutants not present.

Why?

Scenario: A pharmaceutical manufacturer must monitor for a compound called *tetrahydrofuran* twice/year according to 40 CFR part 439.16. The facility does not use any chemicals containing this compound nor is it a product of any reactions. There are only few laboratories in the nation that perform that analysis and it is very expensive. Previous analyses have not detected this compound.

If waiver is granted CA must monitor for pollutant at least once during the term of the permit.

# CIU Optional Options

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## Option 4 - New Classes of CIUs

Current: All CIUs are created equally regardless of compliance history or flow rate.

New: CA's have the option to issue 2 new types of CIU permits based on flow.

Advantages: Reduces monitoring, inspection, and reporting frequencies.



# CIU Optional Options

## Option 4 - New Classes of CIUs.

### Middle Tier CIU

#### Qualifications:

- Wastewater does not exceed
  - 0.01% of WRF hydraulic capacity or 5,000 gpd (which ever is less); and
  - 0.01% of WRF organic capacity; and
  - 0.01% of maximum allowable headworks loading
- CIU has not been in SNC within past 2 years
- And some other stuff

# CIU Optional Options

## Option 4 - New Classes of CIUs.

### Middle Tier CIU

- Advantages:
  - IU monitoring and reporting frequencies can be reduced to annual
  - CA inspection & monitoring frequency reduced to bi-annual
- Why? Good if CA has several qualifying permittees, this would reduce monitoring/inspection work load by 50%
- Why Not? 1 monitoring event in a year with 1 violation = SNC

# CIU Optional Options

## Option 4 - New Classes of CIUs.

### Non-significant CIU

- Qualifications:
  - Never discharge more than 100 gpd of categorical wastewater
  - Have consistently complied w/ pretreatment standards
  - Never discharge untreated *concentrated* wastewater
- Advantages
  - May eliminate sampling/reporting for IU
  - CA not required to monitor/inspect NCIU

Reduces regulatory  
burden/ cost on both  
IU and CA

# CIU Optional Options

## Option 4 - New Classes of CIUs.

### Non-significant CIU

#### Scenario:

- Powder coating facility uses phosphating to alter surface of steel products
- Collects wastewater in 500 gal tank. Every 2 weeks discharges
- Only needs to pH neutralize to meet categorical standards and local limits

Is the IU eligible for this designation?

# Optional Options for SIUs

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1. Best Management Practices
2. Generic Permits
3. SNC for Late Reports

# Optional Options for SIUs

## Option I - Best Management Practices

Current: BMPs were only used in lieu of pretreatment standards in a few categorical industries:

- a. Metal finishers – TOMP
- b. Pesticide formulators – P2 option instead of “0” discharge
- c. Transportation & equipment cleaning – BMP instead of 26 mg/L oil & grease limit

New: CA’s may develop BMPs as local limits

# Optional Options for SIUs

## Option I - Best Management Practices

When appropriate?

- a. Target specific waste streams (i.e. cooling towers, photo & x-ray development)
- b. Target specific facilities – Auto repair, mortuaries, dental offices, restaurants, etc.

The new regs apply only if you permit these as SIUs.

If you permit these as SIU's, we need to talk.

# Optional Options for SIUs

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## Option 2 – General Control Mechanisms

Current: Individual control mechanisms (permits) must be issued to each SIU.

New: SIU's with substantially similar types of operations may apply to be covered by a general permit.



# Optional Options for SIUs

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Option 2 – General Control Mechanisms

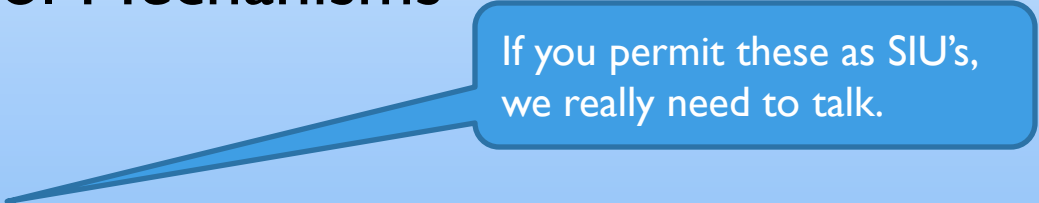
Why? I honestly don't know!

# Optional Options for SIUs

## Option 2 – General Control Mechanisms

Unless...

CA permits restaurants, dental offices, etc. as SIU



If you permit these as SIU's,  
we really need to talk.

Then...

CA would not issue individual permits. SIU or  
qualifying CIU would apply to be covered on the  
general permit.

# Optional Options for SIUs

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Option 3 – SNC for reporting violations

Current: Required reports >30 days late are in significant noncompliance

New: CA may increase days late to >45.

Why?

Cause you want to.



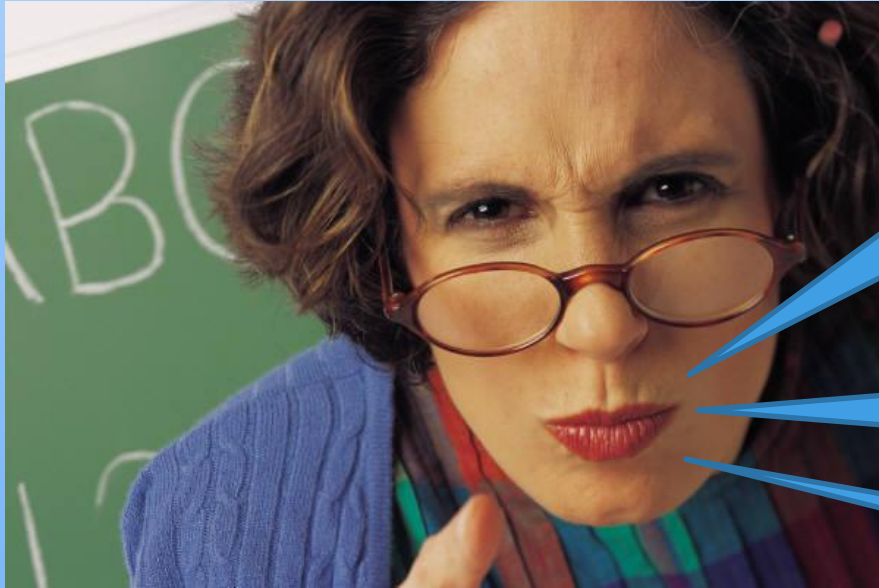
Actually, a nice good will gesture.

# Optional Options not an Option (in Florida)

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- I. Slug Control Plans – no change in frequency to evaluate SIUs for plans

# What if I Opt to Include Optional Options?



Your ordinance must be revised to include the options you want!

Be sure to include required certification statements if needed (pollutant waiver, NSCIU, BMP)

You may need to modify your enforcement response plan to ensure BMP & general permit violations are addressed

# So, Where Do I Start to Change My Ordinance?



Look, youse guys follows EPA's 2007  
Pretreatment Model Ordinance

You, know the one found at:  
[http://www.epa.gov/npdes/pubs/pretreatment\\_model\\_suo.pdf](http://www.epa.gov/npdes/pubs/pretreatment_model_suo.pdf)

Fo – Getta-Bout-It

# Conclusions

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- 62-625 modifications include several optional elements
- Incorporating elements may reduce burden on IP program and IUs
- Pick & choose options that best suit your program's goals.

# Questions?

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For easy to understand fact sheets on options  
check out EPA's website at:

[http://cfpub1.epa.gov/npdes/home.cfm?program\\_id=3](http://cfpub1.epa.gov/npdes/home.cfm?program_id=3)