



EPA Region 3 Annual Report Review


EPA – Region 3 Pretreatment Contacts

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Logistics



- ▶ NPDES Permit Requirement
 - ▶ Due Date – March 31ST of each year
 - ▶ EPA Letter – sent out in December of previous year
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Contents of Annual Report



- ▶ Part A - Pretreatment Performance Summary Sheet
- ▶ Part B – Pretreatment Developments
 - Summary of POTW Operations
 - Sampling and Analysis Data
 - Pretreatment Program Changes
 - Miscellaneous Developments
 - Signatory Requirements


Pretreatment Monitoring Data Spreadsheet


- ▶ Pre-Loaded Spreadsheet – Sent with the Annual Report Instructions and also Instructions for completing data submittal
- ▶ Includes Influent, Effluent, and Sludge Goals
- ▶ Includes required monitoring frequencies
- ▶ Excel 2003 version
- ▶ Based on the most recently accepted local limits
- ▶ Data preferred to be submitted electronically or by CD – not required

NPDES Permit Requirements

- ▶ Part C – Other/Specific Requirements
- ▶ II. POTW Pretreatment Program Implementation
- ▶ General Requirements
 - Annual Report and Other Requirements
 - ▶ Industrial Listing
 - ▶ Control Mechanism Issuance
 - ▶ Sampling and Inspections
 - ▶ Industrial Compliance and Enforcement
 - ▶ Summary of POTW Operations
 - ▶ Pretreatment Program Changes

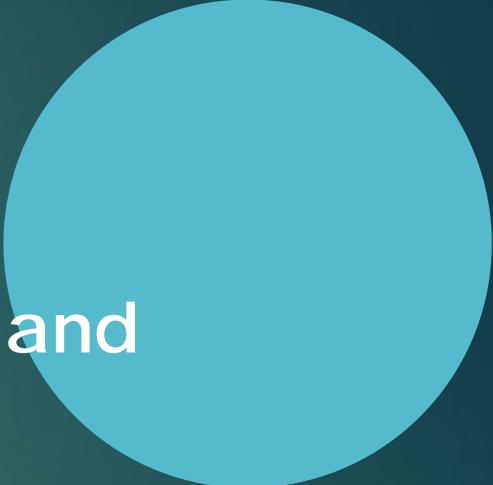
Annual Reports – Additional Items



- ▶ Routine Monitoring
 - ▶ Annual Report – Measures Instruction Sheet
 - ▶ POTW Measures – Breakdown Criteria for Categories
 - ▶ Summary of Measures Ratings for Previous Year
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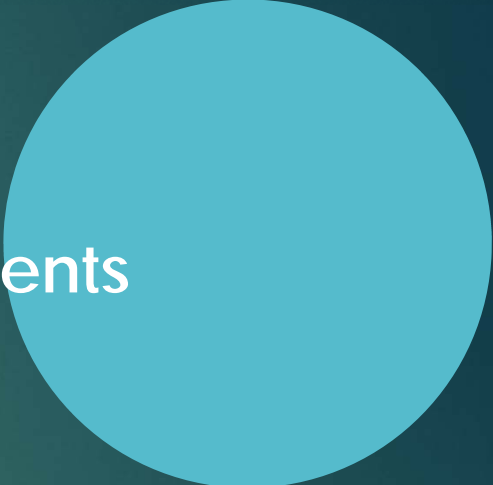
Pretreatment Measures of Success



- ▶ 18 Individual Measures
 - ▶ Most measures have 3 categories
 - ▶ Categories range from 1 to 3
 - ▶ Measures examine influent, effluent and sludge goals
 - ▶ Review of NPDES compliance results
 - ▶ SIU SNC Measures – 4 measures
 - ▶ SIU Sampling
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Pretreatment Measures of Success



- ▶ SIU Inspections
 - ▶ Permit Issuance Rate
 - ▶ Activities Beyond Traditional Requirements
 - ▶ Local Limits Reevaluation
 - ▶ Legal Authority
 - ▶ Streamlining Revisions
 - ▶ Timeliness of Responses
 - ▶ Overall Program Rating
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Pretreatment Monitoring Data Spreadsheet

- ▶ Purpose of Spreadsheet
- ▶ Worksheet data can be downloaded into EPA's Pretreatment Monitoring Database

Pretreatment Monitoring Data Spreadsheet

- ▶ Pollutants Listed
- ▶ Goals – Influent, Effluent, and Sludge
- ▶ Monitoring Frequencies – as per NPDES permit language – quarterly for POC, and annual priority pollutant scan (PPS) results – influent and sludge

Pretreatment Monitoring Data Spreadsheet

- ▶ Influent Data – calculated by converting the MAHL to a concentration using the average POTW flow as indicated in the accepted local limits reevaluation.

Pretreatment Monitoring Data Spreadsheet

- ▶ Effluent Data – Monitoring Frequencies for conventional/unconventional pollutants listed as 0, even where a local limit exists.
- ▶ Sludge Data – No conventional or unconventional pollutants counted.

Applicable Sludge Limits

POLLUTANT	CLEAN SLUDGE LIMIT (mg/Kg) [DRY]	CEILING CONC. (mg/Kg) [DRY]
ARSENIC	41	75
CADMIUM	39	85
COPPER	1500	4300
LEAD	300	840
MERCURY	17	57
MOLYBDENUM	-	75
NICKEL	420	420
SELENIUM	100	100
ZINC	2800	7500
PCBs (PA)	4.0	8.6

Questions

