INDUSTRIAL PRETREATMENT PROGRAM OVERVIEW

LEHIGH COUNTY AUTHORITY
WHAT IS THE NATIONAL PRETREATMENT PROGRAM?

- 1970 – EPA created by executive order
- 1972 – Congress passed the Federal Water Pollution Control Act
  - Known as the Clean Water Act
  - NPDES Program created
    - Direct dischargers
- 1978 – 40 CFR 403 Established
  - Indirect discharger regulations
  - Litigation
- 1981 – Final regulation
PROGRAM GOALS
40 CFR 403.2

- Prevent the introduction of pollutants into a POTW that will
  - Interfere with the operation of the POTW, including interference with its use or disposal of municipal sludge
  - Will pass through the treatment works or otherwise be incompatible with such works

- Improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges.
CONTROL AUTHORITY
CONTROL AUTHORITY

- POTW Pretreatment Program requirements
- Develop and maintain an approved program
  - Legal authority
- Evaluate compliance of regulated industrial users
- Initiate enforcement against industrial users
- Submit reports to approval authority
  - Annual pretreatment report
- Develop local limits (required by the NPDES)
PROHIBITED DISCHARGES

- General prohibitions
  - Pass through/Interference

- Specific prohibitions
  - Fire/Explosion hazard
  - Corrosive (<5.0)
  - Heat (>104°F)
  - Interference
  - Oil in amounts that would cause pass through
  - Hauled pollutants – except in designated locations
INDIRECT DISCHARGERS

- Industrial Users that discharge to a POTW
- Regulated through the Pretreatment Program
- National Pretreatment Program puts most of the responsibility on local municipalities
- 1,600 POTWs regulating ~23,000 significant users
- Includes hauled waste
INDUSTRIAL USERS

 Significant user
  • More than 25,000 gpd
  • Subject to categorical standards
  • Contributes a process stream of >5% of the hydraulic/organic loading of POTW
  • Reasonable potential to affect the POTW operation

 Nonsignificant user
  • Can be categorical if they meet NSCIU requirements
EPA has established standards for 35 categories for indirect dischargers

- 40 CFR Chapter I, Subchapter N, Parts 405-471

Developed for PSES & PSNS

LCA currently permits 7 Categorical industries

- Metal Finishing (3)
- Electrical Components
- Pharmaceutical (2)
- Coil coating
LCA PRETREATMENT PROGRAM

- Approximately 6,000,000 gallons of industrial waste daily

- Categorical users
  - 7 permitted users

- Nonsignificant categorical users
  - 3 classified users

- Significant noncategorical users
  - 30 permitted users
INDUSTRIAL WASTE PERMITS

- Duration
- Ordinance
  - Right of entry
  - Dilution is not acceptable
  - Violations & penalties
  - Criminal & civil liabilities
  - General prohibitive standards
- Slug/Spill prevention control plan

- Discharge limitations
  - Local limits
  - Categorical standards
- Sampling requirements/location
- Reporting requirements
  - Self monitoring reports
- Record keeping
MONITORING & ENFORCEMENT

- **Self monitoring reports**
  - Frequency
  - pH monitoring
  - Flow monitoring

- **LCA sampling and analyzing**

- **Annual inspection**

- **Slug report**

- **Violation**
  - Response with explanation of noncompliance

- **Significant noncompliance**
  - Monetary fine
  - Publication in the newspaper

- **Compliance order**
  - Compliance within certain time

- **Cease and desist**
INDUSTRIAL USER LOCATIONS

Kline’s Island WWTP

Allentown
  - Categorical – 6 SIU - 11

Upper Macungie
  - Categorical – 1 SIU - 12

Lower Macungie
  - SIU - 1

Emmaus
  - SIU - 1

Upper Milford
  - SIU - 2

Salisbury
  - SIU - 1
LCA PRETREATMENT PROGRAM

- 466 sampling events that generated over 2,900 laboratory results.
- 130 Self-Monitoring Reports collected and reviewed
- 37 Industrial inspections conducted
- 13 Violations in 2016
- 2 SNC violations in 2016
HAULED WASTE
(ALLENTOWN WWTP)

- Ordinance - Article 941.3.4
- Septic waste only
- Three haulers accepted
- 2,067,000 gallons accepted in 2016
- Trucks inspected on an annual basis
- Waste is monitored