

The background is a light blue gradient with several realistic water droplets of various sizes scattered across the surface. The droplets have highlights and shadows, giving them a three-dimensional appearance.

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



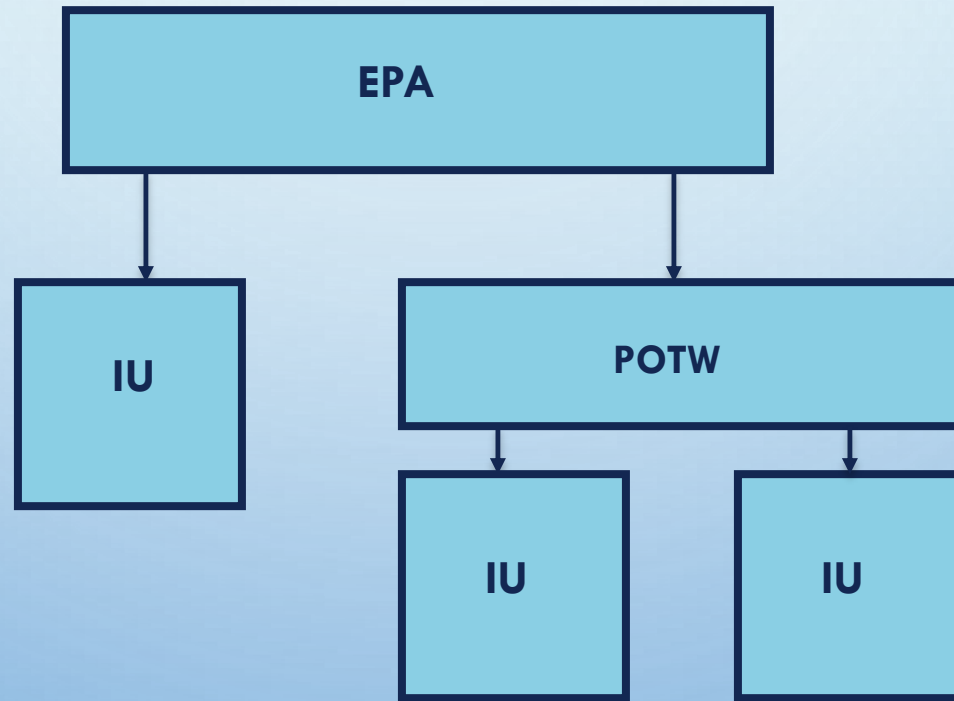
PROGRAM GOALS

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



CATEGORICAL USER

- 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

- ~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

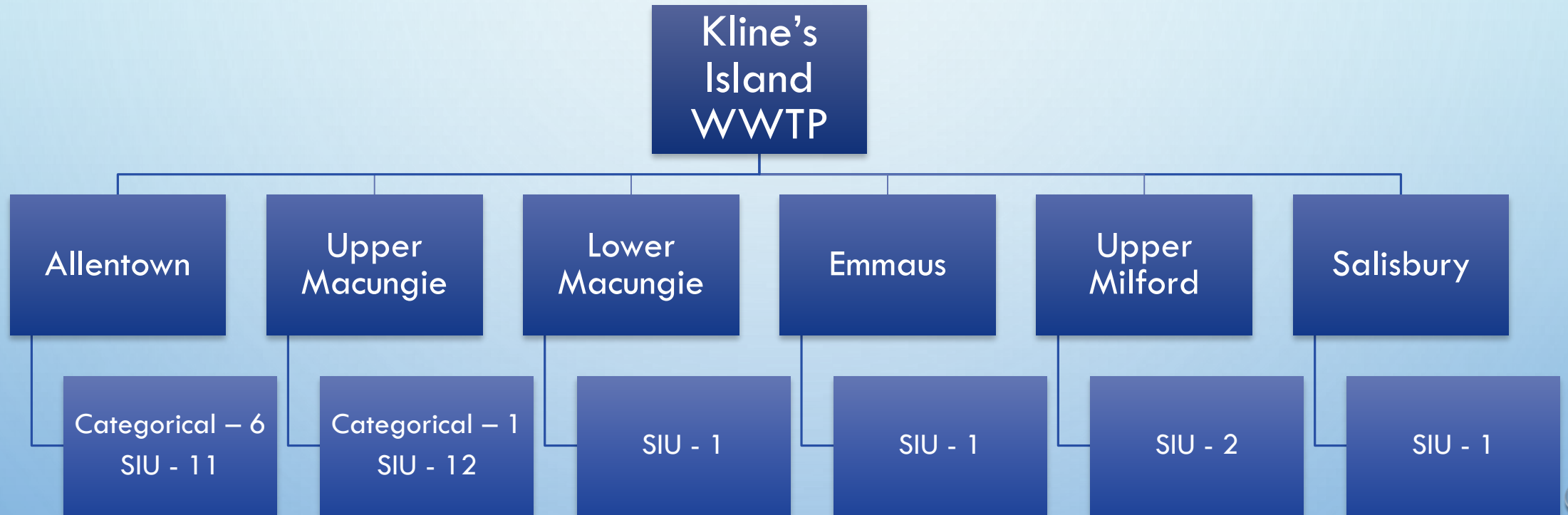
- Monetary fine
- Publication in the newspaper

➤ Compliance order

- Compliance within certain time

➤ Cease and desist

INDUSTRIAL USER LOCATIONS



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