



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF ENFORCEMENT

MEMORANDUM

TO : Enforcement Division Director, Region VII

SUBJECT: Water Treatment Plant Limitations

We have reviewed your proposed regional policy on industrial and municipal water treatment plant permit limitations and agree with your approach and the effluent limitations established. The following remarks will further elaborate on our position and will provide some additional information.

The Permit Policy Statement #13 (see attached) issued on September 13, 1974, is explicit on the prohibition of chemical sludges resulting from supply water treatment. Silt (presedimentation sludges) is approached on the basis of cost-benefit. The cost of disposing of silt by means other than re-introduction to the waterway may be greater than the derived benefits, especially when the waterway normally carries a heavy silt load. On the other hand care must be exercised to assure that water quality standards are not contravened. In short, the re-introduction of silt from a supply water treatment plant is a matter of regional determination..

We were advised by Effluent Guidelines Division (EGD) that the "Draft Development Document for Effluent Limitations Guidelines and Standards of Performance for the Water Supply Industry", March 1975 will be revised and updated. It is scheduled for completion at the end of calendar year 1977 and will serve as an advisory document to assist the NPDES permitting authorities in writing permits for water treatment facilities. According to EGD, effluent limitations will not be promulgated until an economic study is completed at a later date. Based on this, the NPDES permitting authorities should continue issuing permits pursuant to Section 402(a)(1) or on State water quality standards.

Any comments received by Region VII from the other regions responding to your memorandum would assist the Effluent Guidelines Division in their preparation of the advisory document. We would also be interested in receiving these comments.

If you have any further questions, please call Mr. Jeffrey G. Miller. (8/755/0440)

Stanley W. Legro

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RE: February 24, 1977

SUBJECT: BPT Water Treatment Plants
Region VII Policy

FROM: Ronald D. McCutcheon
Chief, Technical Management Section

TO: Mr. Carl M. Walter
Chief, Permit & Compliance Branch

It now appears that final effluent guidelines for water treatment plants (WTP) will not be promulgated. It is imperative the Federal and State permitting authorities be consistent with final effluent limitations throughout Region VII so the dischargers will know they are being treated equally.

Listed below is a summary of the final effluent limitations contained in existing permits:

Parameter and Limitation

<u>State</u>	<u>pH</u>	<u>Suspended Solids</u>	<u>Settleable Solids</u>	<u>Other Limits</u>
Iowa	6.0 - 9.0	20 mg/l avg., 30 mg/l max.	not limited	dissolved Al, Fe and Mg-1.0 mg/l avg. 2.0 mg/l max.
Kansas	6.0 - 9.0	30 mg/l avg., 45 mg/l max.	not limited	infrequently used
Nebraska	6.0 - 9.0	30 mg/l avg., no max.	not limited	infrequently used
Missouri	6.0 - 9.0	not limited	0.1 ml/l (primarily for plants not softening water) 0.2 ml/l (used with softening plants)	infrequently used

Nebraska and Missouri permits for WTPs discharging to the Missouri or Mississippi Rivers contain no final limitations with the statement that final limitations will be incorporated in the permit upon promulgation of EPA final guidelines. This statement in effect gives those facilities a free ride both now and in the future due to the lack of guidelines now and in the future.

Therefore, Region VII has adopted the following policy on WTPs based on a 402(a)(1) best professional judgement.

Henceforth, all WTP permits will contain the following final limitations as a minimum:

pH 6.0 - 9.0 Standard Units

Total Suspended Solids 30 mg/l - monthly average
45 mg/l - daily average

Presedimentation sludges (prior to chemical addition) or other wastes, such as from trash racks, may be returned on a continuous basis to the raw water source, untreated. All other wastewaters must meet the above limitations.