

United States Environmental Protection Agency Office of Water

Office of Water Enforcement and Permits Washington, DC 20460 (EN-335)

PRETREATMENT BULLETIN

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No. 2

SECOND PRETREATMENT BULLETIN ISSUED

In response to a Pretreatment Implementation Review Task Force (PIRT) recommendation, the Office of Water Enforcement and Permits (OWEP) established a pretreatment bulletin, this issue being the second. The bulletins are issued on an as-needed basis to transmit policy,, guidance, regulatory changes and other specific information to all pretreatment POTWs to assist them in the development and implementation of pretreatment programs.

REGULATORY CHANGES

GENERAL PRETREATMENT REGULATIONS

On June 4, 1986, EPA promulgated technical amendments to the General Pretreatment Regulations (40 CFR Part 403). (51 FR 20426). This amendment was necessary to correct typographical errors, erroneous cross-references to the NPDES permit regulations (40 CFR Part 122), and inadvertent omissions in the General Pretreatment Regulations. This action also makes several other minor revisions that clarify the regulations, remove inconsistencies, and update certain other provisions in response to developments which have occurred since their promulgation.

on June 12, 1986, EPA proposed in the Federal Register a number of revisions to the General Pretreatment Regulations. (51 FR 21454). The proposed revisions are intended to clarify existing regulations, respond to recommendations of the Pretreatment Implementation Review Taskforce, and conform the pretreatment regulations to the corresponding NPDES permit regulations and changes to them promulgated on September 26, 1984. (49 FR 37998).

The June 12, 1986 Federal Register notice proposed significant changes to the General Pretreatment Regulations. Any person who is concerned with these regulations should obtain a copy of the June 12 Federal Register for his or her use and information. Responding to several requests to extend the comment period beyond the August 11, 1986 closing date, EPA extended the comment period to September 22, 1986 (51 FR 29950). The Agency is currently reviewing all

comments on the proposed revisions and anticipates promulgation of a final rule in late 1987.

REVISION OF APPENDIX D- GENERAL PRETREATMENT REGULATIONS

Appendix D to the General Pretreatment Regulations lists wastestreams that are considered to be dilute for purposes of using the combined wastestream formula. EPA promulgated revisions to Appendix D on October 9, 1986 (51 FR 36368). The final rule updates the Appendix D list and corrects errors in the original list.

NEW SOURCE, INTERFERENCE AND PASS THROUGH DEFINITIONS

On February 10, 1984, in response to a decision by the U.S. Court of Appeals for the Third Circuit remanding the definitions to the Agency, EPA published a final rule in the Federal Register which suspended the definitions of: new sources [403.3(k)], interference [403.3(i)] and pass through [403.3(n)]. The new source definition was published as a final rule on July 10, 1984. On June 19, 1985, the Agency proposed in the Federal Register new definitions for both interference and pass through (40 CFR §§403.3(i) and (n), respectively). (50 FR 25526).

The final rule promulgating the new interference and pass through definitions in the general pretreatment was published on January 14, 1987 (52 FR 1586). The new definitions replace those suspended by the Agency in February 1984.

The definitions are important for determining when an industrial use has violated the general prohibitions against pass through and interference (or the specific prohibitions in §403.5(b)(3), (4), and (5)) and when POTWs must develop local limits under §403.5(c).

The final rule also creates two affirmative defenses to violations of the general and specific prohibitions. Generally, an industrial user may assert an affirmative defense if either 1) it was in compliance with local limits designed to prevent interference and pass through; or 2) its discharge had not changed substantially from the period prior to the pass through or interference problems during which the POTW was in regular compliance with its permit.

Neither affirmative defense would be available, however, if the industrial user knew or had reason to know that its discharge would cause pass through or interference.

Sludge Regulations

New amendments to the Clean Water Act require that permits issued to treatment works contain limits for sludge use and disposal. Currently, limits for only cadmium and PCB concentrations have been promulgated (40 CFR 257). EPA is scheduled to issue proposed regulations on other toxic pollutants of concern by August 31, 1987. Prior to the promulgation of criteria, sludge permit limits will be set on a case-by-case basis and issued by EPA Regions unless individual State permit limits have been approved. EPA will issue draft guidance on setting case-by-case sludge limits in FY 1987. EPA will develop regulations governing the incorporation of sludge criteria in NPDES permits, and regulations setting forth criteria for approvable State sludge

permitting program, which may be NPDES or non-NPDES.

REMOVAL CREDITS

On April 30, 1986 the United States Court of Appeals for the Third Circuit upheld the Natural Resources Defense Council's challenge to EPA's removal credit regulation (NRDC vs. EPA, No. 84-3530). The Court struck down the amended regulation on four separate grounds:

- (1) EPA's new definition of a POTW's "consistent removal" rate failed to implement the requirements of the Clean water Act and therefore was invalid;
- (2) EPA failed to justify deletion of the previously promulgated combined sewer overflow adjustment;
- (3) EPA's provision specifying the modification and withdrawal process of a POTW's removal credits was illegal; and
- (4) EPA cannot, in the absence of §405 sludge regulations, authorize the granting of removal credits to POTWs under §307(b)(1) of the Act.

On February 23, 1987, the Supreme Court rejected all appeals of the Third Circuit ruling. EPA will be proposing a revised regulation in the near future. EPA is proceeding with the development of sludge regulations (see article on page 2 of this bulletin).

DOMESTIC SEWAGE STUDY

On August 22, 1986, EPA announced it was planning to propose new regulations to improve the control of hazardous wastes discharged by industry to POTWs. The announcement was contained in an Advance Notice of Public Rulemaking (ANPRM) (51 FR 30166).

The ANPRM solicited comment on a broad range of regulatory and program changes in response to the study. Among the proposals were changes to the general pretreatment program and categorical pretreatment standards, improved procedures for water quality and sludge management, and more extensive research in other areas, including air emissions from treatment plants and groundwater contamination. A summary of public comments on the ANPRM shows four general areas of response:

- the commenters (a majority of whom were POTWs) expressed overwhelming support for retaining the Domestic Sewage Exclusion and preference for regulating hazardous waste mixed with domestic sewage under the CWA rather than under RCRA. Environmental groups expressed serious concern about weaknesses in the pretreatment program and suggested fundamental changes and reserved comment on repealing the Domestic Sewage Exemption.

- the commenters, while supporting various improvements in the pretreatment program to improve the control of hazardous wastes, often expressed skepticism about the existence of a major environmental crises in this area which would justify a major revamping of the program. They were concerned about using limited POTW resources for a perceived rather than real problem. Several stressed the importer of fate and effects research in order to document the existence of actual negative impacts of specific pollutants.
- many commenters urged giving POTWs maximum flexibility in implementing any program changes that are eventually made. This flexibility will allow them to tailor requirements to problems (particularly interference) peculiar to their localities.
- at the same time, many commenters wanted EPA to assume the burden of conducting research and issuing technical guidance to help develop controls which are technically and legally justified.

EPA is now in the process of evaluating rulemaking options and expects to issue a Federal Register notice in April 1987 summarizing the public comments on the ANPRM and explaining how the Agency will respond to the recommendations of the Domestic Sewage Study.

Copies of the Domestic Sewage Study may be purchased from the National Technical Information Service in Springfield, Virginia (document no. PB86184017/AS).

DEFINITION OF SIGNIFICANT NONCOMPLIANCE

In EPA's Pretreatment Compliance Monitoring and Enforcement Guidance, the term Significant Noncompliance for industrial users is specifically defined. This definition can be used for:

- establishing appropriate enforcement priorities and actions
- reporting information from POTWs to Approval Authorities

For newspaper listings, a similar term, "Significant Violations", is already defined in the General Pretreatment Regulations. In the future, EPA plans to propose to amend the General Pretreatment Regulations to remove the term "Significant Violations". The single definition of Significant Noncompliance will then be used for enforcement priorities, reporting, and publishing a list of noncompliant industrial users in the newspaper.

CATEGORICAL STANDARDS

IMPLEMENTATION OF NATIONAL CATEGORICAL PRETREATMENT STANDARDS

Each categorical pretreatment standard is published by EPA as a separate regulation. The standards contain limitations for pollutants commonly discharged within each specific industrial category. All firms regulated under a particular industry category are required to comply with these standards, no matter where they are located. Table 1 (on Page 6) lists the 21 industrial categories and the status of the categorical pretreatment standards. One hundred twenty-six toxic pollutants are being considered for regulation in these 21 industrial categories. Final dates for compliance with categorical pretreatment standards have passed for the following industry categories:

- Timber Products Processing
- Electroplating (both integrated and nonintegrated facilities)
- Iron and Steel Manufacturing
- Inorganic Chemicals Manufacturing (Phase I)
- Pulp, Paper, and Paper
- Builders' Paper and Board Mills
- Steam Electric Power Generating
- Electrical and Electronic Components (Phase I)
- Petroleum Refining
- Metal Finishing
- Leather Tanning and Finishing
- Porcelain Enameling
- Coil Coating (Phase I and II)
- Copper Forming
- Aluminum Forming
- Pharmaceuticals Manufacturing

Control Authorities must ensure that industrial users subject to the pretreatment standards for existing sources for the above industry categories comply, and to comply, with the applicable standards after the appropriate final compliance date. See Table 1 (on page 6) for the applicable date for each of the above categories. All new sources in any regulated industry category must comply with applicable pretreatment standards when they start their discharge.

To assist Control Authorities in implementing these categorical pretreatment standards, EPA has prepared guidance manuals for specific industry categories. Manuals are currently available for the Electroplating/Metal Finishing and Iron and Steel Manufacturing categories (see document request form elsewhere in this bulletin). These manuals are designed for use by both Control Authorities and industrial users. OWEPC is tentatively planning, in conjunction with EPA's Industrial Technology Division (ITD), to develop guidance manuals for implementing the categorical standards for several additional categories, including Battery Manufacturing and Metals Forming. Additionally, EPA continues to sponsor seminars throughout the country on the categorical pretreatment standards for specific industry categories. Check with your EPA Regional or State pretreatment contact for further information on seminars in your area.

TABLE 1
National Categorical Pretreatment Standards
Milestone Dates

Industry Category	Date Issued In Federal Effective Register	Date	Report Due Date	Baseline Monitoring Compliance Date	PSES1 Date	Final Compliance Date
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Timber Products Processing	1-26-81		3-11-81		9-26-81		1-26-84		4-26-84
Electroplating ²	1-28-81		3-30-81		9-26-81 (Nonintegrated) 6-25-83 (Integrated) 4-6-83		4-27-84 (Nonintegrated) 6-30-84 (Integrated) 7-10-85		7-26-84 (Nonintegrated) 9-28-84 (Integrated) 10-8-85
Iron & Steel	5-27-82		7-10-82		5-9-83		(See Note		(See Note
inorganic Chemicals	6-29-82		8-12-82		5-9-83		(See Note		(See Note
Phase 1	8-22-84	10-S-84	4-3-85		1 Below)		1 Below)		
Phase 11									
Petroleum Refining	10-18-82		12-1-82		5-30-84		12-1-85		3-1-85
Pulp & Paper Mills	11-18-82		1-3-83		7-2-83		7-1-84		9-29-84
Builders Paper & Board Mills	11-18-82		1-3-83		7-2-83		7-1-84		9-29-84
Steam Electric	11-19-82		1-2-83		7-1-83		7-1-84		9-29-84
Power Plants									
Leather Tanning & Finishing	11-23-82		1-6-83		7-5-83		11-2S-8S		2-23-85
Porcelain Enameling	11-24-82		1-7-83		7-6-83		11-25-85		2-23-85
Coil Coating (Phase I)	12-1-82		1-17-83		7-16-83		12-1-85		3-1-85
-Steel Basis Material									
-Aluminum Basis Material									
Electrical & Electronic Components (Phase I)	4-08-83		5-19-83		11-15-83		7-1-84 11-8-85(As)		9-29-84 2-6-85(As)
-Semiconductors									
-Electronic Crystals									
Metal Finishing	7-15-83		8-29-83		2-25-84		2-15-86		5-16-86
Copper Forming	8-15-83		9-26-83		3-25-84		8-15-86		11-13-86
Aluminum Forming	10-24-83		12-7-83		6-4-84		10-24-86		1-22-87
Pharmaceuticals	10-27-83		12-12-83		6-9-84		10-27-86		1-25-87
Coil Costing (Phase II)	11-17-83		1-2-84		6-30-84		11-17-86		2-15-87
-Canmaking									
Electrical & Electronic Components (Phase II)	12-14-83		1-27-84		7-25-84		7-14-87		10-12-87
-Cathode Ray Tube									
-Luminescent Materials									
Nonferrous Metals Manufacturing									
Phase I	3-8-84		4-23-84		10-20-84		3-8-87 (Subparts A-M)		6-7-87
Phase II	9-20-85		11-4-8S		5-3-86		9-20-88 (Subparts N-AE)		12-19-88
Battery Manufacturing	3-9-84		4-23-84		10-20-84		3-9-87		6-7-87
Nonferrous Metals Forming and Metal Powders	8-23-85		10-7-85		4-5-86		8-23-88		11-21-88
Pesticide Chemicals	*****REMAND*****								
Metal Molding and Casting	10-30-85		12-13-85		6-11-86		10-31-88		1-29-89

Note 1: Final compliance date for Subparts A,B,L,AL,AR,BA, AND SC is July 20, 1980. The compliance date for Subparts AJ,AU,BL,BM,BN, AND BO, except for discharges from copper sulfate or nickel sulfate manufacturing operations, is August 22, 1987. The compliance date for discharges from copper sulfate and nick*) sulfate manufacturing operations and for all Subparts in Part 415 not previously specified is Jun* 29, 1985.

1PSES - Pretreatment Standards for Existing Sources

2Existing job shop electroplaters and independent printed circuit board manufacturers must comply with only the electroplating regulations. All other Electroplating operations are now covered by the metal finishing standards.

CHANGES TO CATEGORICAL PRETREATMENT STANDARDS

As a result of litigation and settlement agreements, various regulatory changes effecting the categorical pretreatment standards listed below have occurred recently or are expected to occur in the near future. Additional information regarding changes in the following specific categories may be obtained by referring to the listed Federal Register notice.

Aluminum Forming

- propose amendments March 9, 1986 (51 FR 9618)
- final amendments expected February 1987
- primary issue: flow basis of mass limits.

Copper Forming

- final amendments to exclude Cu-Be alloys published March 5, 1986 (51 FR 7568)
- proposed regulations for new Beryllium alloy subcategory expected summer 1987.

Nonferrous Metals Forming

- negotiations with litigants still in progress. Remaining issues expected to be settled soon. - proposed amendments expected by summer 1987
- issues include flow, pollutants regulated, treatment effectiveness, cost, economic impact.

Nonferrous Metals Manufacturing- Phase I

- negotiated settlement agreements for Primary and Secondary Aluminum have been reached. Amendments proposed May 20, 1986 (51 FR 18530)
- final amendments expected April 1987
- Primary Tungsten (treatment effectiveness of ammonia steam stripping) settlement agreement has been reached. Proposed amendments expected April 1987.

Nonferrous Metals Manufacturing- Phase II

- settlements with 6 of 10 parties have been reached. If settlements are not reached with remaining parties early in 1987, litigation will be pursued
- issues include cost, ammonia air stripping treatment effectiveness, analytical methods
- Primary Rare Earths subcategory voluntary remand to remove one direct discharger expected February 1987. All other regulations remain in effect.

Battery Manufacturing

- final settlement reached. Regulations amended August 28, 1986 (51 FR 30814)
- issue was flow adjustment for battery washing

Leather Tanning and Finishing

- final settlement completed Proposed amendments expected to be published February 1987
- proposed amendments will include new analytical method for sulfide and revised applicability language for small plants not required to comply with PSES chromium standards.

REMAND OF PESTICIDE MANUFACTURING EFFLUENT GUIDLINES REGULATION

On October 4, 1985, EPA promulgated a final regulation establishing pretreatment standards for existing sources (PSES) and pretreatment standards for new sources (PSNS) for the pesticide chemicals point source category (50 FR 40672).

EPA was sued by several parties who challenged various aspects of the 1985 pesticide regulation. To resolve the litigation, on July 21, 1986, EPA and the several petitioners filed a joint motion for voluntary remand of the rulemaking in the U.S. Court of Appeals for the Eleventh Circuit requesting that the Court remand the 1985 pesticide regulation to EPA. On July 25, 1986, the Court dismissed the litigation in accordance with the joint motion for voluntary remand. This means that the 1985 pesticide regulation is no longer effective (as of July 25, 1986). Efforts are underway to decide on the scope of and deadlines for a study to reconsider the regulation and to undertake further rulemaking. The study will completely reconsider and revise as necessary all aspects of the regulations, and will include

- a new questionnaire
- plant sampling for an expanded list of analytes and other pesticides
- revised and updated engineering, economic and environmental assessments.

The most likely option at this time, presented to environmental and industry, is to study factories and formulators together, resulting in final regulations in about five years (1992). EPA will publish a Federal Register notice in the near future informing the public of this matter.

Indirect dischargers in the pesticide chemical industry continue to be regulated by the general pretreatment regulations. The control authority should set pretreatment standards in accordance with local and other general pretreatment requirements.

SCHEDULE FOR THE ORGANIC CHEMICALS, PLASTICS, AND SYNTHETIC FIBERS FINAL REGULATIONS

The Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF) industry includes approximately 500 indirect discharging facilities which manufacture over 25,000 different products.

The OCPSF regulation is one of the last of the 28 regulations required by the Natural Resources Defense Council (NRDC) Consent (NRDC vs. Train et al.). The Agency proposed regulations for this industry on March 21, 1983, and noted that there were deficiencies in our data base that would require collecting additional information. The Agency subsequently conducted additional toxic pollutant sampling at twelve OCPSF plants and surveyed 3,000 establishments believed to be OCPSF manufacturers. On July 17, 1985, the Agency published a Notice of New Information. This notice was essentially a reproposal and set forth a variety of regulatory options which limit up to 70 of the 126 toxic pollutants. Some issues addressed in this notice include alternative limitations/controls for PSES for small plants, the modification of the POTW pass-through analysis, consideration of metals and cyanide removal technologies, and consideration of package

biological treatemnt for PSES.

SCHEDULE FOR THE ORGANIC CHEMICALS, PLASTICS, AND SYNTHETIC FIBERS FINAL REGULATION (cont.)

On December 8, 1986, the Agency published a Notice of Availability and Request for Comments on additional new information (51 FR 44082). The close of comment period was February 6, 1987. The most recent Court-ordered deadline for this regulation was December 31, 1986. However, EPA was unable to meet this deadline due to the need to obtain public comment on the additional new information. EPA sought to revise the promulgation date to August 1987, and submitted a new affidavit containing this date to the Court on December 5, 1986. The Court has approved this revised schedule.

GUIDANCE MATERIAL

PRETREATMENT COMPLIANCE MONITORING AND ENFORCEMENT GUIDANCE

The Pretreatment Compliance Monitoring and Enforcement (PCME) Guidance was signed by the Director of the office of Water Enforcement and Permits (OWEP) on July 25, 1986. Printed copies of this guidance are being sent from the U.S. EPA Regional offices to States and POTWs with approved pretreatment programs. This guidance is intended to be a comprehensive guide to pretreatment implementation, particularly on-going compliance monitoring and enforcement activities.

The guidance was developed to address several administrative functions that are required of by regulation. The PCME Guidance provides a discussion of the following topics:

- establishing self monitoring requirements for IU's
- establishing sampling frrequencies for IU's
- sampling and inspection procedures for POTWs
- reviewing industrial user reports
- determining industrial user compliance status
- setting priorities for enforcement actions
- reporting POTW activities to the Approval Authority

It establishes a definition of Significant Industrial User (SIU) for use by the Control Authorities in targeting primary implementation activities and recommends a definition of Significant Noncompliance (SNC) to be applied in evaluating industrial user performance in complying with effluent and reporting requirements as well as compliance schedules.

To increase the effectiveness of the National program and achieve consistent enforcement across the nation, reporting at all levels - industrial user, POTW, and State - will be an on-going and significant activity. Such reports will be a necessary component towards determining national compliance with pretreatment standards.

PRETREATMENT COMPLIANCE MONITORING AND ENFORCEMENT GUIDANCE (con't)

As indicated, the Guidance establishes common definitions which can be used as the basis for consistent reporting and provides a recommended format for collection of data from control Authorities on at least an annual basis.

The reporting system and the definitions of SNC and SIU are issued as guidance. However, it is the goal of OWEPP to establish a national reporting system based on the concepts in this document. A Pretreatment Permits and Enforcement Tracking System is now under development which will require some information which could be developed through the use of the Pretreatment Performance Summary found in the PCME Guidance. Approval Authorities should anticipate such requirements and strongly consider requiring Control Authorities to plan for implementation of this reporting system with associated definitions.

To assist Control Authorities in gaining proficiency with compliance monitoring and enforcement activities, Regions and delegated States are encouraged to conduct training workshops providing practical examples of these activities. OWEPP is prepared to jointly develop and conduct such workshops with the Regions and States and is developing training materials which can be used by them.

POTW PROGRAM IMPLEMENTATION - REPORTABLE NONCOMPLIANCE

EPA is developing criteria for tracking violations of POTW pretreatment implementation requirements. The criteria would be used by EPA and States to establish consistent implementation of POTW program, to report on progress of the National Pretreatment program, and to evaluate the effectiveness of EPA and State enforcement program. The criteria cover four areas of POTW program implementation: [1] control mechanism; compliance monitoring and inspections; POTW enforcement; and POTW reporting to the Approval Authority. EPA will study and refine the criteria during 1987 and prepare changes to regulations for Noncompliance Reporting (40 CFR part 123.45).

EPA has the following recommendations to POTWs for compliance monitoring and enforcement.

All POTW Control Authorities are encouraged to have written procedures and ability for:

- 1) maintaining an inventory of non-domestic contributors to the sewer system that are subject to their POTW pretreatment program and a schedule of reports required to be submitted by those contributors to the Control Authority.
- 2) Initial screening (i.e., pre-enforcement evaluation) of all compliance information to identify IU violations of applicable pretreatment, sludge, or hazardous waste requirements and to establish priorities and timeframes for further substantive technical evaluation and/or appropriate enforcement response for those violations.
- 3) When warranted, conducting a substantive technical evaluation following the initial screening of all relevant compliance information to assist the determination of an appropriate response by the Control Authority.
- 4) Maintaining a management information system which supports the compliance evaluation and enforcement activities of the POTW.
- 5) Inspecting the treatment facilities and sampling the wastewater contributions of all significant industrial users at least annually; and
- 6) Enforcing requirements for pretreatment and sludge that apply to non-domestic contributors in a consistent and equitable manner that promotes compliance and the quick resolution of noncompliance.

UPGRADED PRELIM PROGRAM AVAILABLE

An upgraded version of PRELIM, EPA's local limits computer program, will be available shortly from your EPA Regional Pretreatment Coordinator free of charge. The PRELIM program is intended to facilitate the development and modification of POTW pretreatment program and numeric limitations by simulating the methodology and calculations normally used in the limit-setting process. PRELIM also contains several databases that are often needed by those responsible for preparing local limits. The program can be useful to cities, municipalities,, POTWs or consultants for developing or revising local numeric limitations, and by States and EPA personnel for reviewing the proposed specific pollutant limits in POTW pretreatment program submissions. PRELIM output is divided into two sections which can be run and displayed separately or in combination. These two sections are:

1. Calculation of maximum loading of any pollutant that a POTW can accept while continuing to meet its environmental criteria
2. Computation of several alternatives for allocating that loading among the industrial contributors to the POTW.

The upgraded version of PRELIM,, PRELIM Version 3.0, incorporates the following features not

included in previous PRELIM versions (i.e., Versions 1.0, 2.0-2.2):

- PRELIM Version 3.0 accepts POTW data entry in full screen editing format. This format will permit movement of the computer's cursor across an entire screen,, simplifying the correction of data entry errors.
- PRELIM Version 3.0 data files do not overwrite previous PRELIM data files, but are saved under user-supplied names. This modification allows the PRELIM user to concurrently save input data from multiple PRELIM runs.
- PRELIM Version 3.0 output provides the user with loading summary tables by pollutant. These tables provide a ready comparison of allowable headworks loadings with current headworks loadings, as per EPA's local limits policy. This loading summary table also indicates each industrial user's current compliance status with the PRELIM-derived local limits.
- PRELIM Version 3.0 allows the user to display PRELIM outputs on the computer screen as well as to print the output.

In addition, all PRELIM default databases for water quality criteria, sludge criteria, removal rates and process inhibition values were reviewed and updated prior to incorporation in PRELIM Version 3.0.

The system requirements remain unchanged from the previous version of the software. A minimum of 256K RAM is required, and the system must operate under MS-DOS. The program will execute utilizing either Microsoft BASIC© or GWBASIC© software. However, please note, PRELIM will not execute on Leading Edge© personal computers because access commands in BASIC are not compatible. Changes may be made to the PRELIM code to accomodate this, but we advise you contact your dealer for-specific inquiries. The User's Guide provides information on running PRELIM, as well as on preparing information necessary to run the program. The manual provides a step-by-step guide for executing the program, and describes how to utilize and interpret PRELIM output. Users of this program should be familiar with the procedures and methodologies for-setting local effluent limits. PRELIM, like any computer program, cannot replace sound judgement where input or output interpretation is needed.

LOCAL LIMITS TECHNICAL GUIDANCE

Section 403.5(c) of the General Pretreatment Regulations provides that POTWs required to establish local pretreatment programs must develop and enforce specific limits to implement the general prohibitions against pass-through and interference [§403.5(a)] and the specific prohibitions listed in §403.5(b).

To address development of local limits, EPA has undertaken three major steps:

1. developed a computer program (PRELIM) to assist POTWs in calculating local discharge limitations (see previous article regarding the availability of an upgraded version of PRELIM)
2. issued a memorandum, dated August 5, 1985, specifying minimum requirements for development of local limits by POTWs (see document request list on the last page of this bulletin to request a copy), and
3. initiated the development of a guidance manual on local limits.

This manual, the Guidance Manual on the Development of Local Discharge Limitations Under the General Pretreatment Regulations, is expected to be issued during the summer of 1987. It will be made available to all pretreatment POTWs, State and EPA Regional personnel. It will draw upon and update guidance previously issued by the Agency on the control of industrial discharges, provide approaches for evaluating the problem potential of pollutants disch to the sewers, and present new methodologies for deriving discharge standards for toxic organic pollutants. This document will contain numerous figures, reference tables, example calculations and case studies designed to expand upon and illustrate information provided in the text. The guidance manual will be designed to provide the reader with a comprehensive reference on local limits development and implementation methodologies.

GUIDANCE MANUAL ON PREVENTING INTERFERENCE

In response to a Pretreatment Implementation Review Taskforce (PIRT) recommendation that EPA develop guidance to help POTWs understand how to identify an interference problem and track it back to the source, the Agency is preparing the Guidance Manual for Preventing Interference at POTWs. Based on a literature review and 17 case studies, the manual discusses how to identify/detect interference, determine the source, and how to prevent it. A review of the content of the draft manual provides the following overview:

- results of the 17 case studies reveal
 - (1) most interference problems are caused by conventional pollutants
 - (2) problems involving toxics are usually related to isolated or intermittent discharges which are hard to track to the source
- the manual is focused on interference problems involving permit violations
- the importance of distinguishing interference problems from poor plant operation is stressed
- inspection and monitoring of the POTW processes and wastestreams is emphasized under "detecting interference" sections
- IU monitoring, collection system tracking programs, and methods for detecting illegal

discharges and midnight dumping are discussed under "source identification" sections

- alteration of POTW treatment plant processes to reduce the impact of interference-causing substances, pretreatment, local limits, accidental spill plans, regulation of waste haulers, and enforcement are discussed under "mitigation" sections.

The anticipated final issuance date for the manual is Spring 1987. Copies will be made available to all pretreatment POTWs, State and EPA Regional personnel.

IU INSPECTOR TRAINING COURSE UNDER DEVELOPMENT

EPA has awarded a training grant to California State University, Sacramento (CSUS), to develop a self-study course for POTW pretreatment program industrial user (IU) inspectors. Dr. Kenneth Kerri, the project director, has previously developed several popular self-study courses for POTW and water quality personnel. Among them are: Operation of Wastewater Treatment Plants and Operation and Maintenance of Wastewater Collection Systems.

Dr. Kerri has selected a group of experienced POTW pretreatment program personnel to aid in developing the course manual. The draft chapters will be edited by educational and reading comprehension experts, reviewed by the original authors and integrated with illustrations and questions into a technically and educationally sound training course. The course will then go through extensive review and field testing by experienced pretreatment personnel throughout the country, representing a wide variety of POTWs, as well as State and EPA Regional Office pretreatment programs.

After the final modifications are completed, the manual will be printed by the University and used as a basis for a correspondence course. CSUS will grade exams, provide consultation services, and award Continuing Education Units (CEUs) for those who successfully complete all requirements. It is expected that the manual will also be used by community colleges and other organizations as a text for classroom pretreatment training courses.

The course is expected to be available through CSUS late in 1988. For further information, contact Pete Eagen of the Permits Division at EPA Headquarters ((202) 475-9529).

GUIDANCE ON PREPARATION AND ISSUANCE OF PERMITS TO INDUSTRIAL USERS

The Office of Water Enforcement and Permits will develop guidance to assist Control Authority personnel in the preparation and issuance of permits to its industrial users. It is anticipated that this guidance will be based on EPA's Training Manual for NPDES Permit Writers (March 1986). The manual will also discuss a few selected POTW permit programs, how permits are developed, standard conditions, monitoring, etc. The guidance is expected to be completed in the fall of 1987.

AVAILABLE DOCUMENTS

The documents listed on this request sheet are available on a limited basis from EPA. Before requesting any, please check to make sure your office doesn't already have a copy. To obtain a copy of any of the following documents, please provide your name and address, check the requested documents), and return the information to:

Chuck Prorok
U.S. Environmental Protection Agency
401 M Street, SW (EN-336)
Washington, DC 20460

Name:

Address:

Guidance Documents

- () Pretreatment Bulletin No. 1 (September 30, 1985)
- () Guidance Manual for Electroplating and Metal Finishing Pretreatment Standards
- () Guidance Manual for Iron and Steel manufacturing Pretreatment Standards
- () Guidance Manual for Implementing Total Toxic organic (TtO) Pretreatment Standards
- () RCRA Information on Hazardous Wastes for POTWs
- () Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula
- () Pretreatment Compliance Monitoring and Enforcement Guidance
- () Memorandum: Local Limits Requirements for POTW Pretreatment Program (August St 1985)
- () Overview of the National Pretreatment Program (updated periodically)