



Inside Pretreatment Newsletter

May 10, 2010 (Number 35)

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Please forward this Newsletter to Other POTWs. Over 930 subscribers.

Up-to-Date News Items

Job Announcements and Interesting Information: Go to the CWACS website and click on the “News and Meetings” tab at the top of the page.

Upcoming Training for POTW Pretreatment Staff

Grand Junction, Colorado, May 24, 2010: Tour of Grand Junction grease processing station and various pretreatment topics. POTWs only. Free. Registration Closed (full).

Minneapolis, Minnesota, June 22-23, 2010: Local Limits and Inspecting Industrial Users.

All training is limited to smaller groups (generally 35 or less) to facilitate discussion. For more information and registering, please go to the CWACS website and click on the Training Courses tab.

If you are a state pretreatment person and want to organize training for POTW (and your office), please contact CWACS directly.

EPA Takes a Stand: Michigan Amalgam Separator Law - update

I have spent a lot of time since June 2008 on this Law (7 newsletters). I have characterized the Law and provided the concerns I had with limiting local pretreatment authorities and the failure of the State to submit required program modifications to EPA (see CWACS newsletters dated 6-20-08 and 4-9-09). I am speaking on this Law next week at the NACWA National Pretreatment Conference in Phoenix. I will post my talk after that Conference on my website. This will be an interesting talk for those of us concerned with this Law.

EPA has responded to the State (dated March 4, 2010) expressing concern about the Law and the lack of action by the State to submit a program modification to EPA for review. ***You can download the letter on my website (in the Newsletter section and the News and Meetings section)***. I am happy that after almost 2 years, EPA finally gave input to the State. However, it is disappointing that EPA did not set a time frame for any kind of State response (only asked the state to call if they wanted to discuss EPA concerns) or and failed to notify the State that failure to correct the conflicting Law could result in pretreatment program withdrawal.

Get Ready: Methylmercury Permitting Guidance has been Finalized

Guidance for Implementing the January 2001 Methylmercury Water Quality Criterion, Final United States Environmental Protection Agency, Office of Science and Technology (4305T), EPA-823-R-10-001, April 2010. <http://www.epa.gov/waterscience/criteria/methylmercury/guidance-fs-final.html>

I am currently reviewing and comparing changed sections of the permitting guidance with previous versions. I will do a newsletter about this guidance. Yes, pretreatment programs may be significantly impacted by this guidance when the states adopt the new methylmercury criterion. Of course, my preliminary review indicates that EPA has not really required anything, but rather may have used language that recommends actions for pretreatment programs. That will provide maximum flexibility and eliminate all mandatory requirements to control mercury at the source (unless state take the “recommended” language and change it to “required”. Something to watch). Look for my next newsletter. If you want to see my concerns with the prior final document, see my February 27, 2009 newsletter.

<p align="center">NACWA 2010 National Pretreatment & Pollution Prevention Workshop May 19-21, 2010 Phoenix, Arizona www.NACWA.org</p>	<p align="center">EPA/Region 8 Pretreatment Association Annual Pretreatment Workshop May 25-27, 2010 Grand Junction, CO www.R8PA.com</p>
<p align="center">Consortium for Research and Education on Emerging Contaminants (CREEC) Next Meeting (Tentative): June 10, 2010: Golden, Colorado www.CREEC.net</p>	<p align="center">EPA Region 6 Pretreatment Association Annual Pretreatment Workshop August 2-6, 2010 Dallas/Ft Worth, TX www.RegionVIPretreatmentAssociation.org/</p>
<p align="center">CREEC - Emerging Contaminants Workshop September 21-22, 2010 Denver, CO www.CREEC.net</p>	<p align="center">North Carolina Pretreatment Consortium Annual Conference October 3-5, 2010 Atlantic Beach, North Carolina. www.NCPretreatment.org</p>

EPA Moves to Slash Mercury from Gold Production /Harmful emissions would be cut by more than 70 percent (04/16/2010)

The U.S. Environmental Protection Agency (EPA) is proposing to cut emissions from gold ore processing and production facilities, the sixth largest source of mercury air emissions in the country. Today's action is one of several steps EPA is taking to reduce mercury, which can damage children's developing brains and nervous systems, even before they are born.

EPA's proposal would reduce annual mercury emissions to about 1,390 pounds a year – a 73 percent reduction from 2007 levels. This action will build on reductions from Nevada's successful program for controlling mercury emissions from precious metal mining.

EPA will take public comment on the proposed rule for 30 days after it is published in the Federal Register.

EPA to Scrutinize Environmental Impact of Bisphenol A (03/29/2010)

EPA announced a number of actions to address the potential effects of bisphenol A (BPA), a chemical used in the manufacture of a wide range of consumer and industrial products. The BPA action plan released today focuses on the environmental impacts of BPA and will look to add BPA to EPA's list of chemicals of concern and require testing related to environmental effects.

Food packaging represents the most obvious source of BPA exposure to people and is regulated by FDA. Unlike FDA, EPA has authority over the potential environmental impacts of BPA. Releases of BPA to the environment exceed 1 million pounds per year. BPA has caused reproductive and developmental effects in animal studies and may also affect the endocrine system. The EPA action plan on the environmental impacts of BPA includes:

- Adding BPA to the chemical concern list on the basis of potential environmental effects.
- Requiring information on concentrations of BPA in surface water, ground water, and drinking water to determine if BPA may be present at levels of potential concern.
- Requiring manufacturers to provide test data to assist the agency in evaluating its possible impacts, including long-term effects on growth, reproduction, and development in aquatic organisms and wildlife.
- Using EPA's Design for the Environment (DfE) program to look for ways to reduce unnecessary exposures, including assessing substitutes, while additional studies continue.
- And, continuing to evaluate the potential disproportionate impact on children and other sub-populations through exposure from non-food packaging uses.

EPA is working closely with FDA, the Centers for Disease Control and Prevention and the National Institute of Environmental Health Sciences on research to better assess and evaluate the potential health consequences of BPA exposures, including health concerns from non-food packaging exposures that fall outside of the FDA's reach but within EPA's regulatory authority. Based on what this new research shows, EPA will consider possible regulatory actions to address

health impacts from these other exposures.

In December, EPA announced that it will, for the first time, use its authority under the Toxic Substances Control Act (TSCA) to list chemicals that may present an unreasonable risk of injury to health or the environment. The decision to list chemicals signals EPA's concern about the risks that the listed chemicals may pose and the agency's intention to address those risks. These actions are part of the agency's efforts to strengthen EPA's chemical management program, utilizing current authorities to the fullest extent possible, while continuing to encourage legislative reform of TSCA, which has not been updated since 1976 and is in need of reform.

More information on EPA's BPA action

plan: <http://www.epa.gov/oppt/existingchemicals/pubs/actionplans/bpa.html>

A Reminder: Do Not Forget Safety When Entering Confined Spaces!

Middletown Journal. May 8, 2010: Investigators are trying to unravel the mystery of how a routine check of a sanitary sewer line turned deadly Friday morning, May 7, when a city worker was killed and three firefighters were hospitalized after being overcome by unidentified fumes.

Full Story:

<http://www.middletownjournal.com/news/middletown-news/city-worker-killed-in-manhole-accident-3-firefighters-injured-692539.html?>

CWACS offers a full range of pretreatment program support activities. Please ask us for a bid on your next project and include us on your list for future Request for Proposals (RFPs). CWACS offers support on an hourly and project basis. Visit our website or download a [brochure here](#).

Newsletters reflect the opinions of CWACS. They are not intended to change what a specific POTW, state or EPA may require.

Curt McCormick
CWA Consulting Services, LLC

www.CWACS.com
Curt@CWACS.com

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