



Inside Pretreatment Newsletter

September 9, 2008

Thankfully, the Democratic and Republican National Conventions are over. So far, I have only seen one political ad that I thought was good (made me smile). I think that is because I like the song that they play.

Local Limits and Grease Program Training Course

We are currently trying to identify a good hotel for this course in the Dallas area.

CIPCA/EPA Region 8 Pretreatment Conference

It appears that the most likely location for this will be Cody, Wyoming (see Yellowstone!) on May 12-14, 2009. Don't hold me to this, but that is the rumor.

If you are going to the conference, I am tentatively planning on holding a one-day training course on Monday the 11th. Potential topics: IU permitting OR Enforcement Process. If you are interested in one of these topics, let me know. This training is not part of the Conference, but would be held at the same hotel.

Applicability of Regulations to Biodiesel Manufacturing

As was expected by some, EPA has put out guidance (policy must be put in the Federal Register for comment) on why Organic Chemicals Categorical Standards do not apply. If you want to download this memo, you can do so at www.cwacs.com (either in the Newsletter section or a direct link on the homepage).

While confusing, EPA's marching orders are clear: Do not make biodiesel manufacturing a categorical process (they had determined they were not going to call it categorical at the EPA-states meeting in Nashville last year). Note: The best control for these facilities may be through BMPs. That BMP should be "No Discharge", "No Drains", "Keep a Spill Log" and "Notify City of all Fires and Explosions".

Annual Reports and Local Limits

Almost time to start compiling data for the Annual Pretreatment Report (for many POTWs). One issue that seems to be confusing for many POTWs and Approval Authorities relates to an exceedence of a MAHL (Maximum Allowable Headworks Loading) that has been approved by the Approval Authority.

I found during my recent local limits training that there is confusion about MAHLs (that is why I spend significant time on this concept). While it is beyond the scope of this Newsletter to cover this topic in depth, the following concepts should be considered.

Facts

- ✓ A POTW will adopt the most stringent Allowable Headworks Loading (AHL) as the basis for its local limits (called the MAHL).
- ✓ This AHL is designed to protect the environment and POTW from adverse impacts due to a pollutant.
- ✓ This is the direct environmental part of the pretreatment program.
- ✓ An exceedence of a MAHL would indicate that an environmental criteria or standard may have been exceeded (Pass Through, Interference).
- ✓ This is one of the highest priority problems that a POTW should generally respond to.

It is critical to understand what it means when a MAHL is exceeded and whether or not you are violating your approved pretreatment program.

1. When calculating local limits, there are always limitations on data quality and quantity. That is why EPA recommends a safety and expansion factor be used.
2. Most data that is used is averaged data.
3. POTWs often used default data where existing data is not adequate or available (e.g. <MDL).
4. Removal efficiencies are generally calculated from averaged values. Most programs adopt the average daily removal as the basis for the removal efficiency (deciles may be better).

What does this mean?

The removal efficiency may be higher or lower on any given day for a specific pollutant. That is why a POTW may accept a higher loading for a pollutant on a specific day and never observe a corresponding problem. For example, if the approved MAHL for mercury is 0.36 lbs per day (based upon water quality) and on some days you are measuring 0.43 lbs/day in the POTW influent, you may not see a corresponding effluent violation for mercury.

Why? Your removal of mercury on that day was higher than the average daily removal efficiency used in the local limits.

Note: It works the other way also: You may accept mercury and be within the approved MAHL but see a corresponding effluent violation.

If your POTW has a MAHL violation during the year, what should you do?

- ✓ Increase monitoring for the pollutant(s) (e.g. once per week for a few months). Good idea: Carry out the higher frequency influent monitoring during the month(s) when you saw the MAHL exceedence.
- ✓ Couple the influent monitoring with effluent monitoring (or monitoring the media that was the basis for the MAHL (e.g. biosolids, etc).
- ✓ Re-evaluate your current local limit(s) based upon more recent data.
- ✓ Track potential sources and apply BMPs or limits to the non-domestic sources that are identified as the most significant.

These steps should be automatic. The POTW should not wait until the Approval Authority requires such action.

What should Approval Authorities do? Do not take an enforcement action as long as the POTW is taking the steps outlined above in a timely manner. It has to be recognized that a POTW may be getting better removal on a given day than what was modeled in the local limits calculations. The only time an Approval Authority should consider an enforcement action is when Pass Through or Interference has occurred (demonstrated through monitoring) and the POTW has failed to address the problem in a timely and/or appropriate manner.

The Approval Authority is going to want more data on potential impacts to the environment. The POTW is asking for enforcement when it fails to generate this data based upon a MAHL exceedence.

Bottom Line: The POTW needs to institute a program to review and react to POTW influent and effluent data results as that data is received from the lab.

Newsletters reflect the opinions of CWACS. They are not intended to change what a specific Approval Authority may require.

Curt McCormick
CWA Consulting Services, LLC

www.CWACS.com
Curt@CWACS.com

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