EPA Pretreatment Updates

Amelia Whitson, EPA Region 9 Pretreatment Coordinator
BACWA Pretreatment Committee Meeting
February 5, 2020

- Electronic Reporting
- Guidance Manual Updates
- RCRA Rule for Hazardous Waste Pharmaceuticals
- CWA Methods Update Rule
- Effluent Limitation Guidelines Planning
  - Including: Dental Amalgam
NPDES Electronic Reporting Rule

- Final rule effective December 21, 2015 (5-year phase-in for pretreatment reporting)

- Replaces much paper-based NPDES reporting with electronic reporting. Does not add additional reporting requirements on permittees.

NPDES Electronic Reporting Rule

- Pretreatment reporting

  - Covers submittals of:
    - Annual Pretreatment Reports (POTW to Approval Authority)
    - Semi-annual Industrial User Compliance Reports discharging to POTWs without approved pretreatment programs (IU to Approval Authority)

  - Must begin submitting these reports electronically starting December 21, 2020* (*EPA plans to propose to extend to December 21, 2023)
NPDES Electronic Reporting Rule

- EPA-State Pretreatment E-Reporting Technical Workgroup kicked off April 2017
- Implementation Technical Paper, 27 July 2018
  - Define the reference values, business rules, and other data standards
  - Discuss options for data access so that they are useful for program management.
  - Make recommendations for future IT development
- Next steps
  - Computer Programming (as necessary)
  - Beta Testing of Forms
  - Implementation

Lead for this technical workgroup is Carey Johnston (Office of Compliance)
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Receiving Electronic Reports from IUs

- EPA published an updated guidance document in May 2018 on POTW Pretreatment Programs and Electronic Reporting
- Lays out two-step process for (1) seeking CROMERR approval and then (2) modifying your approved pretreatment program to accept IU reports electronically in place of paper copies

Guidance Manual Updates

- IU Inspection and Sampling Manual for POTWs – published January 2017
- Procedures Manual for Reviewing a POTW Pretreatment Program Submission
- Guidance Manual for POTW Pretreatment Program Development
- Guidance for Developing Control Authority Enforcement Response Plans
- Completion of Appendices to IU Permitting Manual
- Guidance Manual for Control of Wastes Hauled to POTWs

RCRA Rule: Management Standards for Hazardous Waste Pharmaceuticals

- Final Rule signed December 11, 2018
- Prohibits healthcare facilities from sewer hazardous waste pharmaceuticals
Clean Water Act Methods Update Rule

- Methods Update Rule proposed October 22, 2019
- Proposed changes include:
  - Revised EPA methods
  - New or revised methods published by voluntary consensus bodies, such as ASTM International and the Standard Methods Committee
  - New or updated methods developed by USGS
  - Methods reviewed under the Alternate Test Procedures program
  - Minor changes to quality assurance and quality control within individual methods
    https://www.epa.gov/cwa-methods/methods-update-rule-2019
- Initiating studies for:
  - Multi-Industry PFAS analysis
  - Industrial nutrient discharges
- Continuing industrial category studies for:
  - Oil & Gas Extraction Wastewater Management
  - Electrical and Electronic
- Developing:
  - New technology review process for ELG Planning
  - New economic screening analysis for ELG Planning prioritization
- ELG Database

Effluent Limitations Guidelines (ELG) Planning

- “Preliminary Plan 14” published October 2019
- Initiating studies for:
  - Multi-Industry PFAS analysis
  - Industrial nutrient discharges
- Continuing industrial category studies for:
  - Oil & Gas Extraction Wastewater Management
  - Electrical and Electronic
- Continuing to populate Industrial Wastewater Treatment Technology Database (IWTT): https://www.epa.gov/iwtt
Dental ELGs

- Final Rule published in Federal Register on June 14, 2017, effective July 14, 2017
- Existing dental facilities subject to the rule must comply by July 14, 2020
- Requires dental offices to comply with requirements based on practices recommended by the American Dental Association, including the use of amalgam separators

https://www.epa.gov/eg/dental-effluent-guidelines

Dental ELGs

- Minimizes dental office reporting requirements and the administrative burden to federal, state, and local regulatory authorities responsible for oversight of the new requirements

- Requires dental facilities to:
  - Install, operate, and maintain an amalgam separator
  - Not use oxidizing or acidic line cleaners
  - Submit a one-time compliance report to Control Authority
    - Due NLT October 12, 2020 for existing sources; within 90 days following introduction of wastewater to POTW for new sources
Dental ELGs

Supporting documents on our website:

- Final rule
- Fact Sheet
- Technical Development Document & Economic Analysis
- Sample One-Time Compliance Report Form
- FAQs
  - For Dentists (Nov 2017)
  - For Control Authorities (May 2018, 2019):