EPA Pretreatment Updates

Amelia Whitson, EPA Region 9 Pretreatment Coordinator
BACWA Pretreatment Committee Meeting
September 30, 2021
EPA Updates

- Electronic Reporting
- Guidance Manual Updates
- RCRA Rule for Hazardous Waste Pharmaceuticals
- CWA Methods Update Rule
- Effluent Limitation Guidelines Planning
- Reuse and Resource Recovery
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, *2025* (deadline extended in Sep 2020)
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 sewering hazardous waste pharmaceuticals

• FAQs available on website
Methods Update Rule finalized, effective July 19, 2021

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-2021
Effluent Limitations Guidelines (ELG) Planning

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

- Preliminary Plan 15 published, comments due Oct 14, 2021

Announces the following actions:

- Beginning of a rulemaking to revise limitations for the Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF) category to address PFAS.
- Initiation of a rulemaking to revise limitations for the Metal Finishing category to address PFAS discharges from chromium plating operations.
- Completion of its detailed study of the Meat and Poultry Products category and initiation of a rulemaking to revise the existing discharge standards for the industry.
- Intention to publish a proposed Supplemental Rulemaking for the Steam Electric Power Generating category.
- Detailed studies of PFAS discharges from the Landfills and Textile Mills categories.
- Initial results from EPA’s studies of multiple categories, including the Metal Products and Machinery, Explosives Manufacturing, and Landfills industries; and provides an update on the PFAS Multi-Industry Study.

- Continuing to populate Industrial Wastewater Treatment Technology Database (IWTT): https://www.epa.gov/iwtt
February 2020: EPA announced the release of the National Water Reuse Action Plan: Collaborative Implementation (Version 1)

- Available in two forms:
  - Printed publication
  - Online Platform

Spring 2021: next Action Plan Update expected

- Highlight progress across the 37 active actions
- Demonstrate collective impact
- Showcase new actions

Email waterreuse@epa.gov to join the WRAP team listserv
Water Security Grand Challenge


To advance transformational technology and innovation to meet the global need for safe, secure, and affordable water.

Goals for the United States to reach by 2030:

- Launch desalination technologies that deliver cost-competitive clean water
- Transform the energy sector’s produced water from a waste to a resource
- Achieve near-zero water impact for new thermoelectric power plants, and significantly lower freshwater use intensity within the existing fleet
- **Double resource recovery from municipal wastewater**
- Develop small, modular energy-water systems for urban, rural, tribal, national security, and disaster response settings.
Sustainable Management of Food

- 2015: in the U.S., more food reached landfills and combustion facilities than any other single material in our everyday trash:
  - 22% landfilled
  - 22% combusted with energy recovery.

- UN Sustainable Development Goal: reduce food loss and waste by half by 2030.