

National Pretreatment Updates

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BACWA Pretreatment Committee Meeting
March 22, 2023*



A long-exposure photograph of a waterfall, creating a soft, blurred effect of white water cascading down dark rocks. The image is positioned on the left side of the slide, with a blue color cast.

EPA Updates

- Electronic Reporting
- Guidance Manual Updates
- RCRA Rule for Hazardous Waste Pharmaceuticals
- CWA Methods Update Rule
- Effluent Limitation Guidelines Planning
- PFAS and Pretreatment
- 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.



EPA Region 9 Annual Pretreatment Reports (2009)

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



Lead for this technical workgroup is
Carey Johnston
(Office of Compliance)

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- 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

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

<https://www.epa.gov/system/files/documents/2022-05/CROMERR%20Compliance%20for%20POTW%20Pretreatment%20Program.pdf>



Guidance Manual Updates

- IU Inspection and Sampling Manual for POTWs – published January 2017

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- 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 sewerage hazardous waste pharmaceuticals
- [May 2022 Fact Sheet for Publicly Owned Treatment Works](#)

<https://www.epa.gov/hwgenerators/final-rule-management-standards-hazardous-waste-pharmaceuticals-and-amendment-p075>



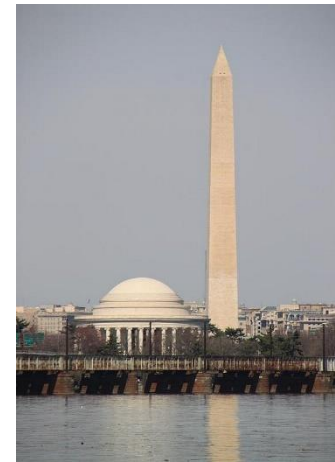


Clean Water Act Methods Update Proposed Rule

- Methods Update Rule proposed February 21, 2023
- **Comments accepted until April 24, 2023**
- Proposed changes include:
 - Minor technical changes and clarifications to improve existing methods
 - New or revised methods published by voluntary consensus bodies, such as ASTM International and the Standard Methods Committee
 - Methods reviewed under the Alternate Test Procedures program and found to be comparable to methods currently in 40 CFR Part 136

<https://www.epa.gov/cwa-methods/methods-update-rules>

Effluent Limitations Guidelines (ELG) Planning



<https://www.epa.gov/eg/current-effluent-guidelines-program-plan>

■ Effluent Guidelines Program Plan 15 published January 2023

Announces the following:

- Determined revisions to the [Landfills](#) category are warranted to address PFAS discharges; will begin rulemaking.
 - Expanding detailed study of PFAS use and discharges from the [Textile Mills](#) category.
 - Updates on rulemaking to revise limitations for the [Organic Chemicals, Plastics, and Synthetic Fibers](#) (OCPSF) category to address PFAS.
 - Updates on rulemaking to revise limitations for the [Metal Finishing](#) category to address PFAS discharges from chromium plating operations.
 - Updates on rulemaking to revise the existing limits for the [Meat and Poultry Products](#) category to address nutrients.
 - Update on proposed Supplemental Rulemaking for the [Steam Electric Power Generating](#) category. *(just published)*
 - Continuing PFAS Multi-Industry Study, currently looking at airports and [Pulp, Paper, and Paperboard](#) category.
- ## ■ Continuing to populate Industrial Wastewater Treatment Technology Database (IWTT): <https://www.epa.gov/iwtt>

PFAS and Pretreatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

December 5, 2022

MEMORANDUM

SUBJECT: Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs

FROM: Radhika Fox
Assistant Administrator

A handwritten signature in black ink, appearing to be "Radhika Fox".

TO: EPA Regional Water Division Directors, Regions 1-10

The National Pollutant Discharge Elimination System (NPDES) program is an important tool established by the Clean Water Act (CWA) to help address water pollution by regulating point sources that discharge pollutants to waters of the United States. Collectively, the U.S. Environmental Protection Agency (EPA) and states issue thousands of permits annually, establishing important monitoring and pollution reduction requirements for Publicly Owned Treatment Works (POTWs), industrial facilities, and stormwater discharges nationwide. The NPDES program interfaces with many pathways by which per- and polyfluoroalkyl substances (PFAS) travel and are released into the environment, and ultimately impact water quality and the health of people and ecosystems. Consistent with the Agency's commitments in the October 2021 [PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024 \(PFAS Strategic Roadmap\)](#), EPA will work in cooperation with our state-authorized permitting authorities to leverage the NPDES program to restrict the discharge of PFAS at their sources. In addition to reducing PFAS discharges, this program will enable EPA and the states to obtain comprehensive information on the sources and quantities of PFAS discharges, which can be used to inform appropriate next steps to limit the discharges of PFAS.

This memorandum provides EPA's guidance to states and updates the April 28, 2022 guidance¹ to EPA Regions for addressing PFAS discharges when they are authorized to administer the NPDES permitting program and/or pretreatment program. These recommendations reflect the Agency's commitments in the PFAS Strategic Roadmap, which directs the Office of Water to leverage NPDES permits to reduce PFAS discharges to waterways "at the source and obtain more comprehensive information through monitoring on the sources of PFAS and quantity of PFAS discharged by these sources." While the Office of Water works to revise Effluent Limitation Guidelines (ELGs) and develop water quality criteria to support technology-based and water quality-based effluent limits for PFAS in NPDES permits, this memorandum describes steps permit writers can implement under existing authorities to reduce the discharge of PFAS.

¹ Addressing PFAS Discharges in EPA-Issued NPDES Permits and Expectations Where EPA is the Pretreatment Control Authority, https://www.epa.gov/system/files/documents/2022-04/npdes_pf-as-memo.pdf.

- [Addressing PFAS Discharges in EPA-Issued NPDES Permits and Expectations Where EPA is the Pretreatment Control Authority \(April 2022\)](#)
- [Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs \(Dec 2022\)](#)

National Water Reuse Action Plan

- Feb 2020: EPA announced the release of the National Water Reuse Action Plan: Collaborative Implementation (Version 1)
 - Available in two forms:
 - Printed publication
 - Online Platform
- Updates on Collaborative Progress:
 - Year 3 (March 2023)
 - Year 2 (March 2022)
 - Year 1 (April 2021)
- Email waterreuse@epa.gov to join the WRAP team listserv

National Water Reuse Action Plan

Improving the Security, Sustainability, and Resilience of Our Nation's Water Resources

Collaborative Implementation (Version 1)



February 2020

