

National Pretreatment Updates



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BACWA Pretreatment Committee Meeting

June 4, 2025

A long-exposure photograph of a waterfall, creating a soft, blurred effect of white water cascading over dark rocks. The image is oriented vertically and occupies the left half of the slide.

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
- PFAS and Pretreatment

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

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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: https://www.epa.gov/sites/production/files/2018-05/documents/cromerr_potw_1.pdf
- 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
- There are some “off-the-shelf” options that have partially gone through Step (1) above: <https://encromerr.epa.gov/About>





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>



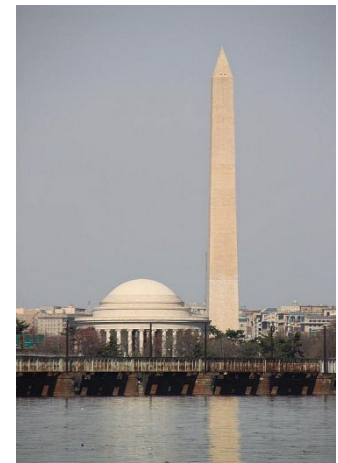


Clean Water Act Methods Update Proposed Rule

- Methods Update Rule proposed December 6, 2024
- Comment period closed March 24, 2025
- Proposed changes include:
 - Promulgating three new methods (for PFAS, AOF, and PCB congeners)
 - Codifying analytical methods developed by Voluntary Consensus Standard Bodies
 - Withdrawing the existing EPA method for seven Aroclors (PCB mixtures)
 - Simplifying the sampling requirements for two volatile organic compounds, acrolein and acrylonitrile

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

Effluent Limitations Guidelines (ELG) Planning



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

- Preliminary Effluent Guidelines Program Plan 16 published Dec 2024
 - Detailed study of the [Battery Manufacturing Category](#) to determine the industrial processes used in electric vehicles and other new batteries
 - Detailed study of the [Centralized Waste Treatment Category](#) to collect PFAS and other pollutant data
 - Study of the [Onshore Oil and Gas Extraction Category](#) to evaluate whether there are affordable and available treatment technologies that can reduce pollutants from the agricultural and wildlife water use subcategory
 - Detailed study of **PFAS processors** to determine if any new or revised ELGs are appropriate
 - Continuing to gather information on PFAS in the [Textile Mills Category](#), [Pulp, Paper, and Paperboard Category](#), and airports
 - Through the [POTW Influent PFAS Study](#), continuing to collect nationwide data on industrial discharges of PFAS to POTWs
 - Collecting data regarding the [Concentrated Animal Feeding Operations Category](#)
 - [Meat and Poultry Products](#) - [Proposed Rule](#) (January 23, 2024)
- Continuing to populate Industrial Wastewater Treatment Technology Database (IWTT): <https://www.epa.gov/iwtt>

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 4](#) (March 2024)
 - [Year 3](#) (March 2023)
 - [Year 2](#) (March 2022)
 - [Year 1](#) (April 2021)

National Water Reuse Action Plan

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

Collaborative Implementation (Version 1)



February 2020



National Water Reuse Action Plan

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February 2020

Water Reuse in the Pretreatment Program

- 40 CFR 403.2 - Objectives of general pretreatment regulations:
 - ... (c): To improve opportunities to *recycle and reclaim municipal and industrial **wastewaters*** and sludges.
- May 2022 - Water Reuse Interagency Working Group established under the Bipartisan Infrastructure Law

Sign up for Water Reuse Updates:

<https://www.epa.gov/waterreuse/forms/sign-water-reuse-email-updates>



WRAP Online Platform

- ▶ **2.4:** Enhance Wastewater Source Control through Local Pretreatment Programs to Opportunities for Municipal Wastewater - NACWA & WEF
- ▶ **3.1:** REUSExplorer: “Compile Existing Fit-for-Purpose Specifications”
Access existing reuse regulations, technical information, and policies through a searchable compilation: Search by state, source water, application
<https://www.epa.gov/waterreuse/regulations-and-end-use-specifications-explorer-reuseexplorer>
- ▶ **8.7:** Highlight Water Reuse Opportunities in the National Pretreatment Program Framework - *new!*



<https://www.epa.gov/waterreuse/national-water-reuse-action-plan-online-platform>

ADMINISTRATOR ZELDIN ANNOUNCES MAJOR EPA ACTIONS TO COMBAT PFAS CONTAMINATION (APRIL 28, 2025)

Excerpts related to Clean Water Act:

Strengthening the Science

- Identify and address available information gaps where not all PFAS can be measured and controlled
- Provide more frequent updates to the PFAS Destruction and Disposal Guidance—changing from every three years to annually—as EPA continues to assess the effectiveness of available treatment technologies
- Ramp up the development of testing methods to improve detection and strategies to address PFAS

Fulfilling Statutory Obligations and Enhancing Communication

- Develop effluent limitations guidelines (ELGs) for PFAS manufacturers and metal finishers and evaluate other ELGs necessary for reduction of PFAS discharges
- Enforce Clean Water Act limitations on PFAS use and release to prevent further contamination
- Work with Congress and industry to establish a clear liability framework that operates on polluter pays and protects passive receivers

Building Partnerships

- Work with states to assess risks from PFAS contamination and the development of analytical and risk assessment tools
- Finish public comment period for biosolids risk assessment and determine path forward based on comments
- Provide assistance to states and tribes on enforcement efforts
- Resource and support investigations into violations to hold polluters accountable

www.epa.gov/pfas