

# National Pretreatment Updates



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*BACWA Pretreatment Committee Meeting*

*June 18, 2026*

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, **\*2028\*** *for California*



# 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
- EPA Pretreatment E-Reporting system (NeT-PPR) is in production
- California will be developing an alternate E-Reporting system for pretreatment

# 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](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>





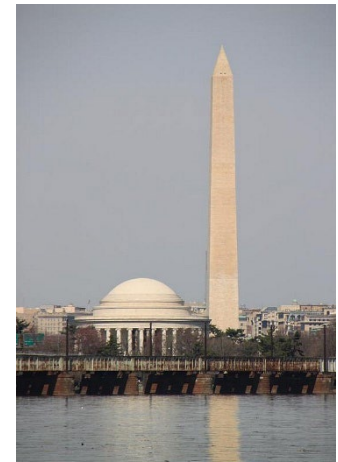


# **Clean Water Act Methods Update Proposed Rule**

- 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/effluent-guidelines-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 2.0

## Water Reuse Action Plan 2.0

*Multiplying Water Benefits,  
Maximizing American  
Prosperity*

- On April 16, 2026, EPA released the Water Reuse Action Plan (WRAP) 2.0

- <https://www.epa.gov/waterreuse/water-reuse-action-plan-20>







## WRAP 2.0 Continues Pretreatment Action

- 40 CFR 403.2 - Objectives of general pretreatment regulations:
  - ... (c): To improve opportunities to *recycle and reclaim municipal and industrial wastewaters* and sludges.
- **Action 8.7** (still active): *Highlight Water Reuse Opportunities in the National Pretreatment Program Framework*



# NEW EPA “COMPREHENSIVE PFAS STRATEGY”

- Announced May 22, 2026
- From EPA’s press release:

## The Announcement at a Glance

|                         |                                                                                       |
|-------------------------|---------------------------------------------------------------------------------------|
| <b>4.0 ppt</b>          | Maximum Contaminant Level for PFOA and PFOS — <b>unchanged</b>                        |
| <b>~\$1 billion</b>     | New grant funding for small and disadvantaged communities                             |
| <b>+2 years</b>         | Additional compliance time available through the federal opt-in framework             |
| <b>April 2031</b>       | Target compliance date for eligible water systems                                     |
| <b>2 proposed rules</b> | Uphold the PFOA/PFOS standards while correcting a procedural error on four other PFAS |

[www.epa.gov/pfas](https://www.epa.gov/pfas)