



Springfield Water and Sewer Commission Industrial Pretreatment Program General Summary

Introduction: The Environmental Protection Agency (EPA) approved the Industrial Pretreatment Program (IPP) on July 7, 1986, under the rules and regulations established through the Clean Water Act. The mission of the IPP is to protect the Springfield Water and Sewer Commission Regional Wastewater Treatment Facility (SRWTF) and the municipal sewer systems from the harmful effects of toxic and hazardous wastewater. The IPP jurisdiction extends over the eight municipalities that use the services of the SRWTF: Agawam, Chicopee (portion), East Longmeadow, Longmeadow, Ludlow, Springfield, West Springfield and Wilbraham. The minimum performance criteria for EPA approved pretreatment programs are described in Part 40 of the Code of Federal Regulations (40 CFR 403.8).

New Regulation: As of July 14, 2017 EPA's final rule came into effect imposing Effluent Limitation Guidelines and Standards for the Dental Category 40 CFR Part 441 – Dental Office Point Source Category which includes sections on: Applicability, General Definitions, Pretreatment standards for existing sources, Pretreatment standards for new sources, and Reporting and recordkeeping requirements. Dental Facilities which place and remove dental amalgam are required come into compliance with these standards by installing and operating acceptable amalgam separation devices, perform in-house or third party inspections and maintenance, proper disposal of dental amalgam, perform record keeping, comply with Best Management Practices, and submit a One-Time Compliance Report which demonstrates compliance, past and future, and certifies compliance under penalty of enforcement action including possible fines and imprisonment for knowing violations. EPA has designated that local IPPs are the Control Authority for this set of regulations.

Industrial Inventory: The federal regulations require the IPP, under 40 CFR 403, to maintain an inventory of non-residential sewer users in the SRWTF service area. The IPP classifies the sewer users into two groups: Significant Industrial Users (SIUs) and Registered Sewer Users (RSUs).

The federal regulations define SIUs, under 40 CFR 403 as:

- a facility regulated under a federal categorical standard,
- a facility that discharged 25,000 gallons per day or more of process wastewater,
- a facility that discharged process wastewater that contributed 5% or more of the average dry weather hydraulic or organic loading to the Wastewater Treatment Works,
- or a facility that had the potential to adversely affect the Wastewater Treatment Works.

RSUs are defined as nonresidential facilities that do not meet the SIU criteria. They are divided into two classes: Wet Process and Dry Process. Wet Process RSUs discharge process wastewater on either a continuous or intermittent basis, and generally use best management practices to control their wastewater and prevent the release of toxic and hazardous substances. Dry Process RSUs do not discharge process wastewater, but discharge only non-regulated and sanitary wastewater. Sanitary wastewater discharges (bathrooms, etc.) are not regulated.

Inspections: The IPP verifies SIU and RSU compliance with the local sewer codes, the state sewer codes, and the federal pretreatment standards, through periodic inspections. The SIUs are inspected on a monthly to semi-annually basis, and the RSUs are evaluated on a three to five year basis. The evaluations are designed to review information, evaluate wastewater treatment systems, exchange information and verify compliance with the rules and regulations. The inspectors may request additional information related to the scope of pretreatment.

Permits and Surveys: All SIUs are issued an Industrial Wastewater Discharge Permit (IWDP) for each regulated outfall to the public sewer. The IWDP has specific performance criteria to help SIUs maintain compliance with the local sewer codes, the state sewer codes, and the federal pretreatment standards. The IWDP is used to formally notify SIUs of the applicable pretreatment regulations, and of their responsibility to comply with those regulations. An IWDP is issued for a term of up to three years and is renewable upon reapplication. RSUs are not issued IWDPs, unless they are found violating the local sewer codes, or the federal regulations.

The RSUs are subject to less rigorous requirements, mainly consisting of a periodic wastewater survey and follow-up inspection. The RSUs are registered in the IPP database so that they can be surveyed by mail, and notified of any requirements under the pretreatment or sewer use regulations. The IPP periodically inspects the RSUs to verify information, and confirm the facility's wastewater characteristics.

The IPP also issues Temporary Discharge Permits (TDPs) to facilities that have either one-time or infrequent industrial wastewater discharges. The TDP also has both general and specific discharge standards, and special monitoring and reporting standards. SIUs and RSUs often use the TDP to conduct site remediation projects or hydrostatic tests on storage tanks.

Enforcement: The federal regulations, under 40 CFR 403.8 (f) (2), require the IPP to investigate instances of noncompliance with the pretreatment regulations. In addition, the federal regulations, under 40 CFR 403.8 (f) (2) (vii) (A-H), established a minimum criteria for classifying non-complying SIUs in *Significant Noncompliance*. Accordingly, the IPP developed an enforcement mechanism that notifies SIUs of violations of the local sewer codes, the state sewer codes, and the federal pretreatment standards. The mechanism documents violations of the pretreatment regulations and tracks each SIUs compliance status.

Environmental Quality: The IPP provides other services to municipal departments and divisions. The IPP has consistently achieved the EPA's performance criteria in helping the SRWTF maintain the EPA's water quality standards. In 1992 the EPA nominated the IPP for the National Pretreatment Award. With the assistance of the IPP, the community has become a cleaner and safer environment.