



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Overview of Missouri's Industrial Pretreatment Program

Water Protection Program
Forum

August 8, 2018

Objectives

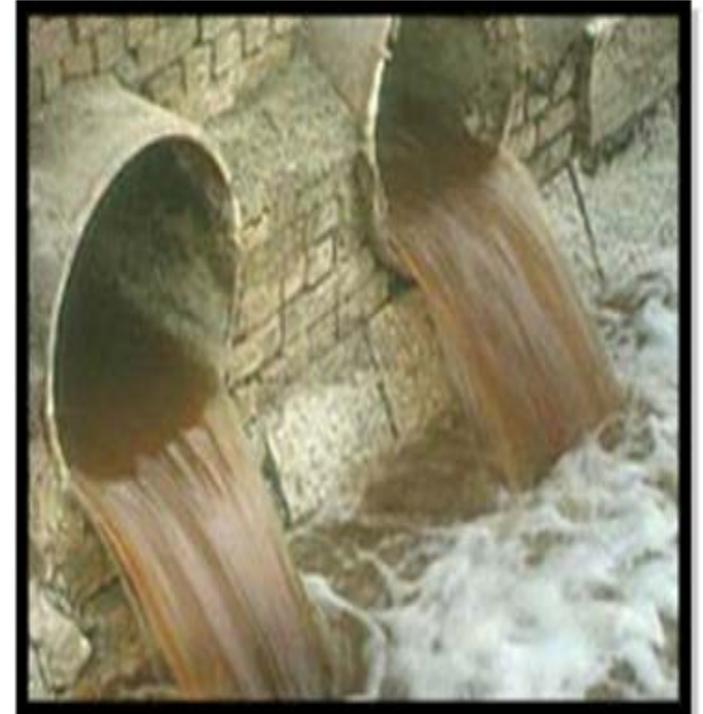
1- Purpose of Pretreatment

2- Regulatory Components of

National Pretreatment Program:

- MoDNR's Role
- POTW's Responsibilities,
Requirements, and Duties

3- Inspection Overview



What is a Pretreatment Program?

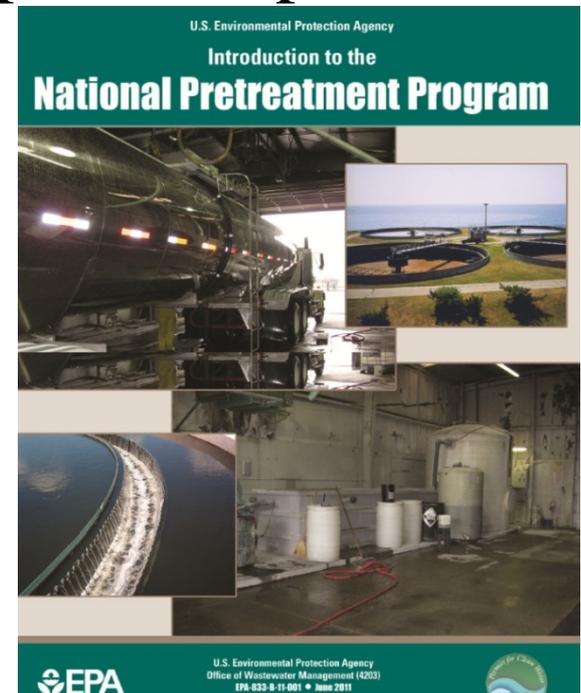
- Program to control industrial discharges (non-domestic discharges) to wastewater treatment facilities administered by publicly-owned treatment works (POTW) to protect the facility from potential problems from industrial pollutants.

Useful Reference:

Introduction to the National

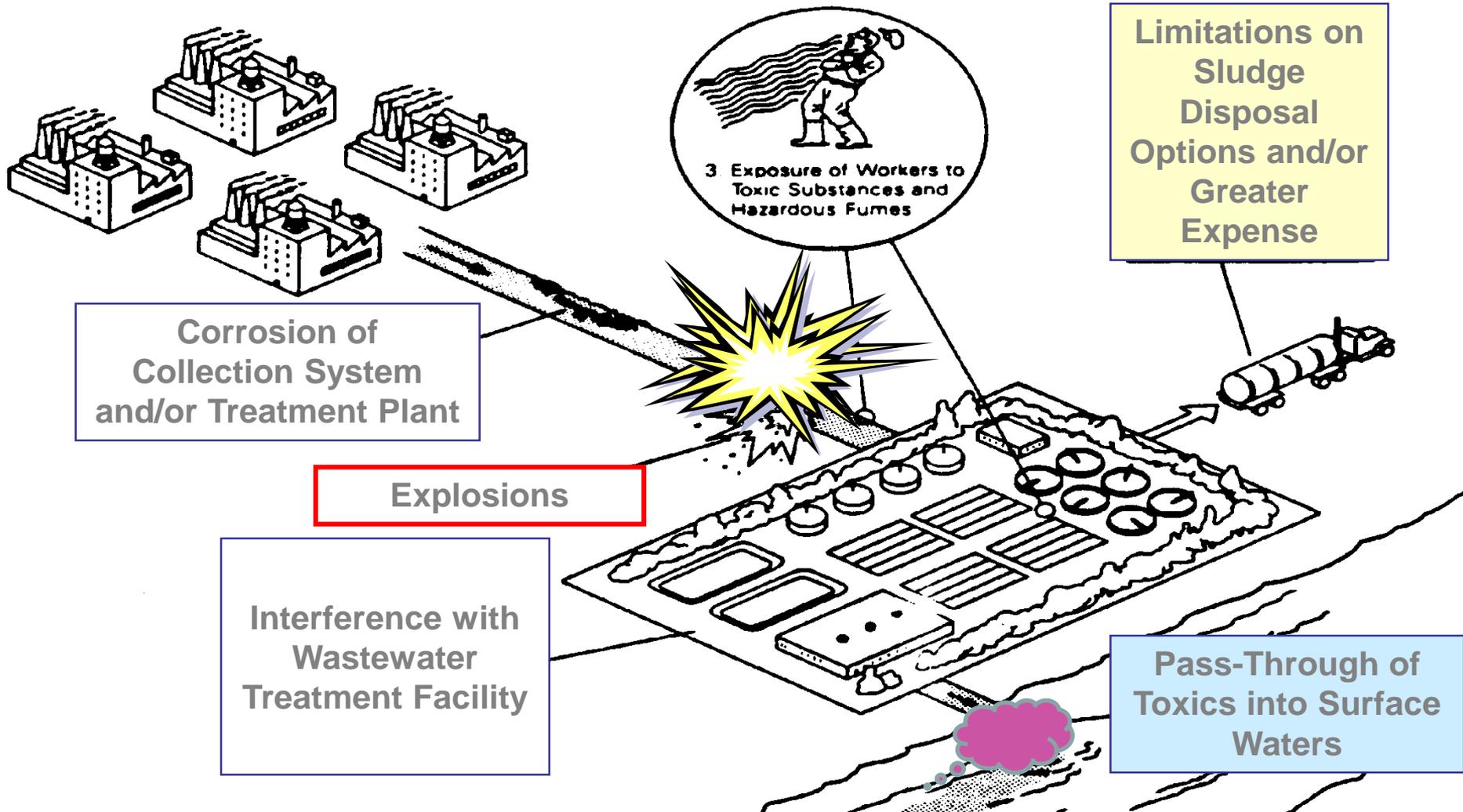
Pretreatment Program is available at:

www3.epa.gov/npdes/pubs/pretreatment_program_intro_2011.pdf





Prevent Pollutants from causing:



Benefits of the Pretreatment Program For Industry:

- Practices to reduce volume of toxic chemicals in wastewater thus reducing costs and enhancing working safety,
- Reduces potential liability associated with toxic wastewater, and
- Feedback mechanism for responsible wastewater and potentially hazardous wastes (40 CFR 261) management.



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Regulatory Components of National Pretreatment Program



Clean Water Act

- Initially, Oct 18, 1972, Federal Water Pollution Control Act.
 - 40 CFR Part 128 in late 1973
- Then, 1977 Clean Water Act - Section 307(a) - Toxics and **307(b)** – Pretreatment
 - 40 CFR Part 403 on June 26, 1978



General Pretreatment Regulations

- From §403.1 – §403.20 with recent changes:

2005 Streamlining Rule –

<https://www.epa.gov/npdes/npdes-pretreatment-streamlining-rule-fact-sheets>



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Missouri's Program, Law, and Regulations

Clean Water Law

644.026 (17) and **644.041**



General Pretreatment Regulations

10 CSR 20-6.100

Newest Missouri Pretreatment Rule

The *Missouri Clean Water Commission* adopted the new General Pretreatment Regulation October 30, 2012. The new rule (pages 43-44):

<https://www.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf>

Adopts the federal pretreatment regulations with modifications, substitutions and additions that authorize the state to implement the rule.



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Department's Role in Pretreatment

Department's Role in Pretreatment

Missouri Given Federal Authority:

Oct. 30, 1974 - NPDES Program

June 03, 1981 - Pretreatment Program

Department's Pretreatment Authority:

- Require POTW create and implement pretreatment program
- Approve POTW programs
- Regulate / inspect categorical industries outside POTW approved programs
- Regulate / inspect or audit state-approved pretreatment program

Responsibilities within Department

- Central Office
 - Require POTW create & implement program
 - Approve POTW pretreatment programs
 - Report to EPA - MOA
- Regional offices
 - Inspect categorical industries outside POTW approved programs – Annually
 - Inspect and audit of communities with approved pretreatment program.
 - Respond to non-compliance issues

Regional Office Pretreatment Inspectors

- KCRO – Lynn Nguyen, Denis Eagan, Scott Honig, Supervisor
- NERO – Scott Adams, Thuy Le, Supervisor
- SERO – Mike Hefner, Dan Skouby, Supervisor.
- SLRO – Rachel Schneider, Eric Gilstrap, Supervisor
- SWRO – Sieu Dang, Kevin Hess, Supervisor

When is a POTW required to have a pretreatment program?

Based upon regulation at 40 CFR 403.8(a) criteria and findings:

I. POTW or combined POTWs flow > 5 MGD and receiving industrial pollutants where Finding #5 is needed or pretreatment standards apply

Or, in conjunction with the findings below the following:

II. POTW or combined POTWs flow less than 5 MGD under circumstances where Finding #1-4 apply or #5 is warranted.

Director's Findings:

- 1) Nature or volume of industrial pollutants
- 2) Past treatment facility upsets, interference or pass through
- 3) Violation of NPDES Limits
- 4) Sludge contamination
- 5) Prevention of pass through or interference and to protect worker health and safety

Categorical industries discharging to publicly-owned treatment works (POTW) in communities without an approved pretreatment program

The department acts as the Control Authority (CA) for a POTWs administering and enforcing the pretreatment program through:

- 1- Categorical Industrial User Inspection (CIU),
- 2- Semi-annual industrial user reports, and
- 3- Annual compliance sampling by the Environmental Services Program (ESP).



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Approved Pretreatment Programs

POTW Responsibilities and Requirements

State Compliance Inspections

An approved program must contain these six elements:

- **Legal authority**
- **Procedures**
- **Funding**
- Industrial effluent limits
- Enforcement Response Plan (ERP)
- List of significant industrial users (SIUs)

Approved Pretreatment Cities in Missouri

KCRO	NERO	SERO	SLRO	SWRO
Independence	Boonville	Cape Girardeau	NE PS District	Cassville
Little Blue Valley	Chillicothe	Cuba	O'Fallon	Carthage
<u>Kansas City</u>	Columbia	Farmington	St. Charles	Joplin
Maryville	Hannibal	Jackson	St. Clair	Lamar
North Kansas City	Jefferson City	Perryville	<u>MSD</u>	Lebanon
St. Joseph	Macon	Poplar Bluff	Sullivan	Monett
Sedalia	Marshall	Portageville	Union	Marshfield
Liberty	Mexico	Rolla - reactivating	St. Peters	Neosho
Warrensburg	Moberly	Sikeston	Washington	Nevada
	Monroe City		Wentzville	<u>Springfield</u>
	Trenton – inactive		Gerald	
	Palmyra			

State Pretreatment Inspections

- Cities with approved programs
- Categorical Industrial Users (CIU) outside of approved programs



The bottom line: State CIU pretreatment inspections help prevent costly damage to municipal wastewater treatment systems

Categorical Industry Inspection

- Checklist Items: POCs, Water Balance, Monitoring and reporting, Waste treatment, Slug control.
- Facility Tour: “New” regulatory processes, Secondary containment – chemical storage location of floor drains, Treatment operation, Sampling location.



State Municipal Inspections to:

Verify implementing the program correctly

- Modifications to program
- Pass thru/Interference enforcement
- IU Characterization—When and how IWS done
- Control mechanisms—Issue > 90% w/in 6 mos.
- Inspection/Sample > 80 % past 12 months
- Enforce pretreatment standards and reporting

Questions??

Overview of

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