

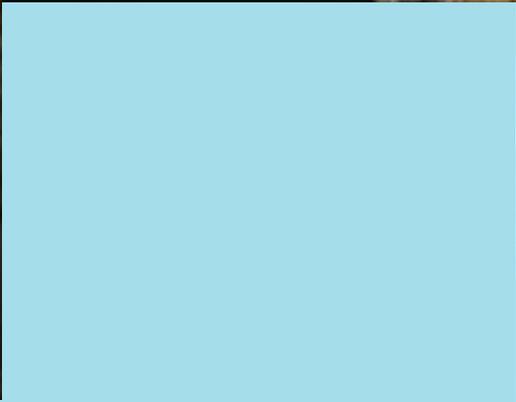
Overview of Categorical Standards

Presented by:
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RVIPA Annual Pretreatment Conference
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3 Types of Pretreatment Standards

- ▶ General & specific prohibitions
 - ▶ Local limits
 - ▶ Categorical standards
- 



Overarching Goals of Categorical Pretreatment Standards

- ▶ Ensure that standards for indirect dischargers (to POTWs) are equivalent to standards for direct dischargers (to waters of the U.S.)
 - ▶ Take into account the treatment capability of the POTW
 - ▶ Establish “level playing field”
- 



Categorical Standards



- ◆ Nationally applicable
- ◆ Applicable to specific industry categories
- ◆ Technology-based limitations
- ◆ Found in 40 CFR Parts 405–471
- ◆ Different requirements for direct and indirect dischargers

▶ *Categorical Pretreatment*

▶ *Standards*

▶ *(for YOU ? Just "Categoricals")*

- **Technology-based, National & Uniform**

- **Required by CWA '307(b) and (c)**

- **CWA '304(m) "Plan" (EPA is required to publish**

- ▶ **this "plan" once/two years in FR)**

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

▶ [https://www.epa.gov/sites/production/files/2018-05/documents/metal-](https://www.epa.gov/sites/production/files/2018-05/documents/metal-finishing_prelim-review_april-2018.pdf)

[finishing_prelim-review_april-2018.pdf](https://www.epa.gov/sites/production/files/2018-05/documents/metal-finishing_prelim-review_april-2018.pdf) for '15 Metal Finishing Preliminary Study

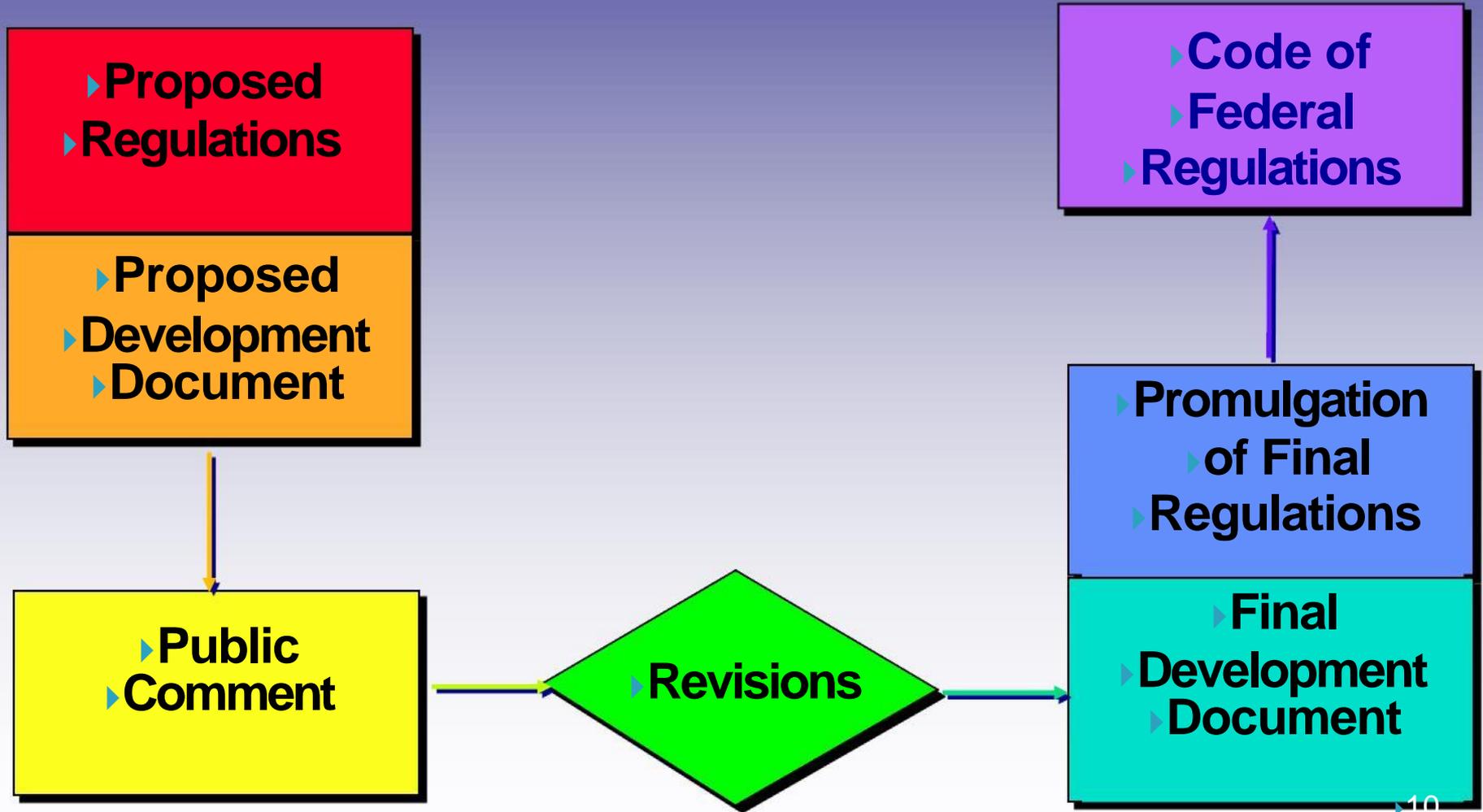
Categories Targeted

- **1976 EPA/NRDC agreement (lawsuit)**
 - 21 identified in '76; modified to 34 in '79
- **58 Categories (Effluent Guidelines) to date**
- **Located in 40 CFR Parts 405-471 @**

<http://water.epa.gov/scitech/wastetech/guide/industry.cfm>

(includes the final Rule's FR preamble, its Development Document & guidance manual [where one was drafted])

From Proposal to Codification



Technologies to meet Categorical Standards?

▶ BPT

▶ BCT

▶ BAT

▶ NSPS

PSES

PSNS

- ***PSNS - Pretreatment Standards for New Sources:***

- *National, uniform, technology-based standards*
- *Required to be in compliance on the effective date of the Rule's promulgation*

- ***PSES - Pretreatment Standards for Existing Sources:***

- *National, uniform, technology-based standards*
- *Required to be in compliance within 3 yrs of effective date of Rule's promulgation*

PSES

- Is NOT a new source
- May be less stringent than PSNS
- Assumes need for retrofit of treatment technology/practices
- Compliance date = specified in regulation (no more than 3 years after effective date)

PSNS

- Is a new source
- Often more stringent than PSES
- Opportunity to install best and most efficient process and treatment technology/practices
- Compliance date = ASAP (not to exceed 90 days from discharge)

See Definition of New Source: 40 CFR 403.3(m)
Additional Guidance: “New Source Memorandum”
<https://www.epa.gov/npdes/national-pretreatment-program>

▶ **Categorical Standards:**

▶ *General Provisions*

- **Applicability** (processes covered or excluded, e.g.)

- **Definitions** (subparts, ops covered, units of production to use for calculating prod.-based discharge limits, TTOs, e.g.)

- **Monitoring and reporting requirements** (variance from periodic reporting for CN, e.g.)

- **Compliance date for PSES**

- **Other** (removal credits, certification statements, e.g.)

Summary of categorical pretreatment standards

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
1	Aluminum Forming	467	A–F	PSES PSNS	Limits are production-based daily maximums and monthly averages. Subpart C prohibits discharges from certain operations.
2	Battery Manufacturing	461	A–G	PSES PSNS	Limits are production-based daily maximums and monthly averages. No discharge is allowed from any process not specifically identified in the regulations.
3	Carbon Black Manufacturing	458	A–D	PSNS	Limits are for oil and grease only (no duration specified).
4	Centralized Waste Treatment	437	A–D	PSES PSNS	Limits are concentration-based daily maximums and monthly averages.
5	Coil Coating	465	A–D	PSES PSNS	Limits are production-based daily maximums and monthly averages.
6	Concentrated Animal Feeding Operations (CAFO)	412	B	PSNS	Discharge of process wastewater is prohibited, except when there is an overflow resulting from a chronic or catastrophic rainfall event.
7	Copper Forming	468	A	PSES PSNS	Limits are production-based daily maximums and monthly averages.
8	Electrical and Electronic Components	469	A–D	PSES PSNS	Limits are concentration-based daily maximums and 30-day averages or monthly averages (varies per subpart and pollutant parameter). Certification is allowed in lieu of monitoring for certain pollutants when a management plan is approved and implemented.
9	Electroplating	413	A,B,D–H	PSES	Limits are concentration-based (or alternative mass-based equivalents) daily maximums and four-consecutive-monitoring-days averages. Two sets of limits exist, depending on whether facility is discharging more or less than 10,000 gpd of process wastewater. Certification is allowed in lieu of monitoring for certain pollutants when a management plan is approved and implemented.

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
10	Fertilizer Manufacturing	418	A–G	PSNS	Limits may specify zero discharge of wastewater pollutants (Subpart A), production-based daily maximums, and 30-day averages (Subparts B–E), or may be concentration-based (Subparts F–G), with no duration of limit specified.
11	Glass Manufacturing	426	H K–M	PSNS	Limits are concentration- or production-based daily maximums and monthly averages.
12	Grain Mills	406	A	PSNS	Discharge of process wastewater is prohibited at a flow rate or mass loading rate (BOD ₅ and TSS) that is excessive during periods when a POTW is receiving peak loads.
13	Ink Formulating	447	A	PSNS	Regulations specify no discharge of process wastewater pollutants to a POTW.
14	Inorganic Chemicals Manufacturing	415	A,B,F,L, AH,AJ,AL, AR,AU,BC, BL,BM,BO	PSES	Limits vary for each subpart with a majority of the limits concentration-based, daily maximums, and 30-day averages, or they may specify no discharge of wastewater pollutants.
			B–F, H, K–N,P,Q, T,V,AA, AC,AE,AH AI,AJ,AL, AN,AP,AQ AR,AU,AX BB,BC, BH, BK–BO	PSNS	
15	Iron and Steel Manufacturing	420	A–F, H–J, L	PSES PSNS	Limits are production-based daily maximums and 30-day averages.
16	Leather Tanning and Finishing	425	A–I	PSES PSNS	Limits are concentration-based daily maximums and monthly averages. In certain instances, applicability of pretreatment standards is dictated by volume of production.
17	Metal Finishing	433	A	PSES PSNS	Limits are concentration-based daily maximums and monthly averages. Certification is allowed for certain pollutants where a management plan is approved and implemented.
18	Metal Molding and Casting	464	A–D	PSES PSNS	Limits are primarily production-based daily maximums and monthly averages. Discharges from certain processes are prohibited (Subparts A–C).
19	Nonferrous Metals Forming and Metal Powders	471	A–J	PSES PSNS	Limits are production-based daily maximums and monthly averages. In some instances, the discharge of wastewater pollutants is prohibited.

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
20	Nonferrous Metals Manufacturing	421	C, F–M, P, Q, V, X, Y, AA–AC	PSES	Limits are production-based daily maximums and monthly averages. PSES (Subpart F) specify no discharge from existing facilities of process wastewater pollutants to the POTW except for some stormwater events.
			A–Z, AA–AE	PSNS	Limits are production-based daily maximums and monthly averages. PSNS (Subparts D and F) specify no discharge from existing facilities of process wastewater pollutants to the POTW.
21	Oil and Gas Extraction	435	D	PSES PSNS	Regulations specify no discharge of wastes (e.g., produced water, drill cuttings) to a POTW.
22	Organic Chemicals, Plastics, and Synthetic Fibers	414	B–H, K	PSES PSNS	Limits are mass-based (concentration-based standards multiplied by process flow) daily maximums and monthly averages. Standards for metals and cyanide apply only to metal- or cyanide-bearing wastestreams.
23	Paint Formulating	446	A	PSNS	Regulations specify no discharge of process wastewater pollutants to the POTW.
24	Paving and Roofing Materials (Tars and Asphalt)	443	A–D	PSNS	Limits are for oil and grease only (no limit duration specified).
25	Pesticide Chemicals	455	A, C, E	PSES PSNS	Limits are mass-based (concentration-based standards multiplied by process flow) daily maximums and monthly averages. Subpart C specifies no discharge of process wastewater pollutants but provides for pollution-prevention alternatives. Subpart E specifies no discharge of process wastewater pollutants.
26	Petroleum Refining	419	A–E	PSES PSNS	Limits are concentration-based (or mass-based equivalent) daily maximums.
27	Pharmaceutical Manufacturing	439	A–D	PSES PSNS	Limits are concentration-based daily maximums and monthly averages. Such facilities may certify that they do not use or generate cyanide in lieu of performing monitoring to demonstrate compliance.
28	Porcelain Enameling	466	A–D	PSES PSNS	Limits are concentration-based (or alternative production-based) daily maximums and monthly averages. Subpart B prohibits discharges from certain operations.

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
29	Pulp, Paper, and Paperboard	430	A–G, I–L	PSES PSNS	Limits are production-based daily maximums and monthly averages. Such facilities may certify that they do not use certain compounds in lieu of performing monitoring to demonstrate compliance. Facilities subject to Subparts B and E must also implement BMPs as identified.
30	Rubber Manufacturing	428	E–K	PSNS	Limits are concentration- or production-based daily maximums and monthly averages.
31	Soap and Detergent Manufacturing	417	O–R	PSNS	Regulations specify no discharge of process wastewater pollutants to a POTW when the wastewater chemical oxygen demand (COD)/BOD ₅ ratio exceeds 10.0 and the COD concentrations exceed subcategory specific concentrations.
32	Steam Electric Power Generating	423	—	PSES PSNS	Limits are concentration-based daily maximums, or <i>maximums for any time</i> , or compliance may be demonstrated through engineering calculations.
33	Timber Products Processing	429	F–H	PSES PSNS	All PSNS (and PSES for Subpart F) prohibit the discharge of wastewater pollutants. PSES for Subparts G and H are concentration-based daily maximums (with production-based alternatives).
34	Transportation Equipment Cleaning	442	A–C	PSES PSNS	Operators subject to effluent guidelines in subparts A–B must either meet concentration-based daily maximum standards or develop a Pollutant Management Plan. Operators subject to effluent guidelines in subpart C must meet concentration-based daily maximum standards.
35	Waste Combustors	444	A	PSES PSNS	Limits are concentration-based daily maximums and monthly averages.



Categorical Determinations

- ▶ Look at applicability section of categorical standard.
 - If more than one subpart, note the applicability section of each subpart
 - Note: exceptions (“what this part does not apply to”), other categorical standards that apply and “trump” this standard
- ▶ Multiple categorical standards may apply at one facility

***YOU MUST IDENTIFY APPLICABLE
PROCESSES, SUBPARTS/SUBPROCESSES
SUBJECT TO
CATEGORICAL STANDARDS***

HOW????

- ▶ **IDENTIFY:**
- ▶ **Manufacturing processes employed;**
- ▶ **Raw materials used including chems;**
- ▶ **Types of items produced; and**
- ▶ **Characteristics of typical wastes generated**

EXAMPLE OF ONE CATEGORY'S:

***Subparts (Subcategories) and/or
Subprocesses***

CFR 464 - METAL MOLDING & CASTING

Subpart A - Aluminum Casting Subcategory

Subpart B - Copper Casting Subcategory

Subpart C - Ferrous Casting Subcategory

Subpart D - Zinc Casting Subcategory

a. Casting Quench Operations Standards

b. Die Casting Operations Standards

c. Melting Furnace Scrubber Ops Standards

d. Mold Cooling Operations Standards

TIPS FOR DETERMINING IF AN IU IS A CATEGORICAL

1) MUST REQUIRE COMPREHENSIVE IU SURVEYS AND PERMIT APPLICATIONS

A. NEED COMPREHENSIVE PROCESS NARRATIVE

B. NEED COMPREHENSIVE WW FLOW SCHEMATIC

2) SURVEYS & APPLICATIONS SHOULD INCLUDE QUESTIONS PERTINENT TO THE IU'S OPERATIONS FROM RAW MTRL IN TO FINISHED PRODUCT OUT

▶ 3) IF IU IS ANY TYPE OF FOOD RELATED PRODUCER/PROCESSOR, IT IS MORE THAN LIKELY NOT A CATEGORICAL WITH PSES OR PSNS => *NOT A* CATEGORICAL UNDER THE NATIONAL PRET PROGRAM

***TIPS FOR DETERMINING IF IU IS A
CATEGORICAL WITH PSES/PSNS
SOME QUESTIONS TO BE ASKED ON AN IU
SURVEY OR PERMIT APPLICATION***

- ▶ **SIC CODES ARE NOT THE DETERMINING FACTOR IN ALL CASES, JUST A "FLAG" TO MAYBE LOOK CLOSER (site visit?)**
 - *CFR 414 "Organic Chems, Plastics & Synthetic Fibers" is an exception*
- ▶ **RAW MTRL: NOT JUST METAL (*or other*) substrate, BUT VIRGIN CHEMS (*Not Trade Names*) USED IN PROCESSING**
- ▶ **ASK ABOUT PROCESSES THAT INCLUDE ANY TYPE OF ACIDS, CAUSTICS, DEFOAMERS, SURFACTANTS.**
 - *WHAT'S THEIR PURPOSE?*

Categorical Standards:

Determine Existing vs New Source

- **Check PSES compliance date**
- **Check new source definition in CFR 403.3(m)**
 - ▶ ***– Construction after PSES compliance date?***
 - ▶ ***– Total replacement of processes or equipment?***
 - ▶ ***– WW generating processes are substantially independent from previous ops?***
 - ▶ **– Interpretations are “all over the board...” (call Region 6 Coordinator to help determine)**



Categorical Determinations Resources

- ▶ EPA's Effluent Guidelines and Standards Website
<http://water.epa.gov/scitech/wastetech/guide/index.cfm>
- ▶ EPA's "ELG" Industrial Wastewater Contacts
<http://water.epa.gov/scitech/wastetech/guide/contact.cfm#elg-list>
- ▶ EPA's Pretreatment Standards and Limits Website
<http://cfpub.epa.gov/npdes/pretreatment/pstandards.cfm#categorical>
- ▶ Contact Approval Authority for assistance

Types/Duration of Limits (Standards)

- **Daily maximum**
- **Max for any monthly avg**
- **Max for any time**
- **Long term averages**
 - ▶– **4 consecutive monitoring days**
 - ▶– **Avg of daily values for 30 consecutive days**
 - ▶– **Monthly**
- **Values with no duration (Instantaneous?)**

How are Categorical Pretreatment Standards Expressed?

- ▶ Numeric values for specific pollutants
 - Concentration limits (e.g., “mg/l”)
 - Mass limits based on production rates (e.g., “kg/1000 kkg (or pounds per million pounds) of metal poured”)
 - Mass limits based on a concentration standard (then multiplied by a facility’s process wastewater flow)
- ▶ Best Management Practices
- ▶ Prohibitions, including “No discharge”



Concentration-based limits

Example:
Metal Finishing
40 CFR 433.17
PSNS

§ 433.17 Pretreatment standards for new sources (PSNS).

(a) Except as provided in 40 CFR 403.7, any new source subject to this subpart that introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve the following pretreatment standards for new sources (PSNS):

PSNS

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
Milligrams per liter (mg/l)		
Cadmium (T)	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13	

(b) Alternatively, for industrial facilities with cyanide treatment, and upon agreement between a source subject to these limits and the pollution control authority, the following amenable cyanide limit may apply in place of the total cyanide limit specified in paragraph (a) of this section:

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
Milligrams per liter (mg/l)		
Cyanide (A)	0.86	0.32

(c) No user subject to the provisions of this subpart shall augment the use of process wastewater or otherwise dilute the wastewater as a partial or total substitute for adequate treatment to achieve compliance with this limitation.

(d) An existing source submitting a certification in lieu of monitoring pursuant to §433.12 (a) and (b) of this regulation must implement the toxic organic management plan approved by the control authority.

Production-based limits

Example:
 Metal Molding and Casting
 Subpart A – Aluminum Casting Subcategory
 40 CFR 464.15, PSES
 Subprocesses (a) and (b) shown (additional subparts not shown)

§ 464.15 Pretreatment standards for existing sources.

Except as provided in 40 CFR 403.7 and 403.13, any existing source subject to this subpart which introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve the following pretreatment standards for existing sources.

(a) Casting Cleaning Operations.

PSES

Pollutant or pollutant property	Maximum for any 1 day	Maximum for monthly average
	kg/1,000 kkg (pounds per million pounds) of metal poured	
Copper (T)	0.0771	0.0421
Lead (T)	0.0791	0.039
Zinc (T)	0.114	0.0431

(b) Casting Quench Operation.

PSES

Pollutant or pollutant property	Maximum for any 1 day	Maximum for monthly average
	kg/1,000 kkg (pounds per million pounds) of metal poured	
Copper (T)	0.0093	0.0051
Lead (T)	0.0096	0.0047
Zinc (T)	0.0138	0.0052
TT0	0.029	0.0095
Oil and grease (for alternate monitoring)	0.363	0.121



Production-Based Standards

Equivalents

- Mass-based limitations
- Concentration-based limitations

Mass limits based on a concentration standard

Example:
Organic Chemicals and
Synthetic fibers
40 CFR 414.24 &
414.26

§ 414.25 Pretreatment standards for existing sources (PSES).

Except as provided in 40 CFR 403.7 and 403.13, any existing source subject to this subpart which introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve discharges in accordance with §414.111.

[58 FR 36892, July 9, 1993]

§ 414.26 Pretreatment standards for new sources (PSNS).

Except as provided in 40 CFR 403.7 any new source subject to this subpart which introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve discharges in accordance with §411.111.

[58 FR 36892, July 9, 1993]

40 CFR 414.111 (excerpt)

§ 414.111 Toxic pollutant standards for indirect discharge point sources.

(a) Any point source subject to this subpart must achieve discharges not exceeding the quantity (mass) determined by multiplying the process wastewater flow subject to this subpart times the concentration listed in the following table.

(b) In the case of lead, zinc, and total cyanide the discharge quantity (mass) shall be determined by multiplying the concentrations listed in the following table for these pollutants times the flow from metal-bearing waste streams for metals and times the flow from the cyanide-bearing waste streams for total cyanide. The metal-bearing waste streams and cyanide-bearing waste streams are defined as those waste streams listed in Appendix A of this part, plus any additional OCSF process wastewater streams identified by the control authority on a case-by-case basis as metal or cyanide bearing based upon a determination that such streams contain significant amounts of the pollutants identified above. Any such streams designated as metal or cyanide bearing must be treated independently of other metal or cyanide bearing waste streams unless the control authority determines that the combination of such streams, prior to treatment, with the Appendix A waste streams will result in substantial reduction of these pollutants. This determination must be based upon a review of relevant engineering, production, and sampling and analysis information.

Effluent characteristics	PSES and PSNS ¹	
	Maximum for any one day	Maximum for any monthly average
Acenaphthene	47	19
Anthracene	47	19
Benzene	134	57
Bis(2-ethylhexyl) phthalate	258	95
Carbon Tetrachloride	380	142
Chlorobenzene	380	142

BMPs as categorical standards

- ▶ Certification is allowed in lieu of monitoring
- ▶ Specified pollutants
- ▶ Management plan must be approved and implemented
- ▶ Examples:
 - Electroplating (40 CFR 413.03)
 - Pulp, Paper, and Paperboard (40 CFR 430.02)
 - Metal Finishing (40 CFR 433.12)
 - Transportation Equipment Cleaning (PSES & PSNS – various subparts)
 - Electrical and Electronic Components (40 CFR 469.13)

Prohibitions in ELGs

Examples:

40 CFR 415.36 – Inorganic chemicals manufacturing, Subpart C calcium carbide production subcategory, PSNS

There shall be no discharge of process wastewater pollutants to navigable waters.

40 CFR 423.16(a) – Steam electric power generating, PSES

There shall be no discharge of polychlorinated biphenol compounds such as those used for transformer fluid.

40 CFR 461.14(b) – Battery manufacturing, Subpart A cadmium subcategory, PSES

There shall be no discharge allowance for process wastewater pollutants from any battery manufacturing operation other than those battery manufacturing operations listed above.



Production-Based Standards – Conversion to Concentration Standards

*► *Equivalent Concentration Limit =*

$$\frac{(\text{Production limit}) * (\text{Average daily production value})}{(\text{Average daily flow})} \times (\text{Conversion Factor})$$

Conversion factors:

3.78 liters (L) = 1 gallon (gal)

10^6 gallons (gal) = 1 million gallons (MG)

10^6 milligrams (mg) = 1 kilogram (kg)



Production-Based Standards – Example of Conversion to Concentration Standards

Given

- ▶ Production-based standards:
 - Daily max limit = 0.004 kg Cu/ton of product
 - Max monthly average limit = 0.002 kg Cu/ton of product
- ▶ Conditions:
 - Production rate = 500 tons product/day, 12-month average
 - Flowrate = 0.2 MGD, 12-month average



Production-Based Standards – Example of Conversion to Concentration Standards

▶ Daily maximum limit calculation

$$\frac{\begin{array}{c} \text{Categorical} \\ \text{production} \\ \text{limit (daily} \\ \text{maximum)} \\ \left[\frac{0.004 \text{ kg Cu}}{\text{ton}} \right] \end{array} \times \begin{array}{c} \text{Average daily} \\ \text{production} \\ \text{rate} \\ \left[\frac{500 \text{ tons}}{\text{day}} \right] \end{array} \times \begin{array}{c} \text{Conversion} \\ \text{factor} \\ \left[\frac{1,000,000 \text{ mg}}{\text{kg}} \right] \end{array}}{\begin{array}{c} \left[\frac{0.2 \text{ MG}}{\text{day}} \right] \times \left[\frac{1,000,000 \text{ gal}}{\text{MG}} \right] \times \left[\frac{3.78 \text{ L}}{\text{gal}} \right] \\ \text{Average} \\ \text{wastewater} \\ \text{flow} \end{array} \times \begin{array}{c} \text{Conversion} \\ \text{factor} \end{array} \times \begin{array}{c} \text{Conversion} \\ \text{factor} \end{array}}$$

• Daily max limit = 2.6 mg/L



Production-Based Standards – Example of Conversion to Concentration Standards

▶ Monthly average limit calculation

$$\frac{\begin{array}{c} \text{Categorical} \\ \text{production} \\ \text{limit (monthly} \\ \text{average)} \\ \left[\frac{0.002 \text{ kg Cu}}{\text{ton}} \right] \end{array} \times \begin{array}{c} \text{Average daily} \\ \text{production} \\ \text{rate} \\ \left[\frac{500 \text{ tons}}{\text{day}} \right] \end{array} \times \begin{array}{c} \text{Conversion} \\ \text{factor} \\ \left[\frac{1,000,000 \text{ mg}}{\text{kg}} \right] \end{array}}{\begin{array}{c} \left[\frac{0.2 \text{ MG}}{\text{day}} \right] \times \left[\frac{1,000,000 \text{ gal}}{\text{MG}} \right] \times \left[\frac{3.78 \text{ L}}{\text{gal}} \right] \\ \text{Average} \\ \text{wastewater} \\ \text{flow} \end{array} \times \begin{array}{c} \text{Conversion} \\ \text{factor} \end{array} \times \begin{array}{c} \text{Conversion} \\ \text{factor} \end{array}}$$

Monthly Average Limit = 1.3 mg/L

Applicability of Pretreatment Standards

	General and Specific Prohibitions	Categorical Pretreatment Standards	Local Limits
All IUs			May apply; depends on POTW ordinance and permit provisions
SIUs			Generally apply; may depend on allocation method
CIUs			Generally apply; may depend on allocation method

Summary of Pretreatment Standards

	General and specific prohibitions	Categorical pretreatment standards	Local limits
Development	Established at the federal level.	Established at the federal level.	Developed by the POTWs.
Reference	40 CFR 403.5(a) & (b)	40 CFR Parts 405–471	Requirements for development found in 40 CFR 403.5(c) & 403.8(f)(4). Local limits are often found in the local sewer use ordinance.
Applicability	All IUs	CIUs	Commonly all IUs or all SIUs, but depends on the allocation method used when developing limits.
Purpose	Provide for general protection of the POTW. Categorical pretreatment standards or local limits may be more stringent.	Minimum standards based on available treatment technology and pollution prevention measures for controlling nonconventional and toxic pollutants that could cause pass through, interference, and such at the POTW. Local limits may be more stringent.	Provide site-specific protection for a POTW and its receiving waters. Categorical standards may be more stringent.

All standards are considered pretreatment standards for the purpose of CWA section 307(d), and therefore all standards, including local limits developed in accordance with 40 CFR 403.5(c), are enforceable by EPA and the state even though they might be developed at the local level. A POTW is responsible for identifying standard(s) applicable to each IU and applying the most stringent requirements where multiple provisions exist. Compliance with imposed standards can be achieved by any of the following: implementing BMPs, developing a pollution prevention program, or installing pretreatment.

Other Provisions to Consider...

Dilution prohibition
[40 CFR § 403.6(d)]

Removal credits
[40 CFR § 403.7]

Fundamentally different factors
[40 CFR § 403.13]

Net/Gross calculation
[40 CFR § 403.15]



Questions?

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