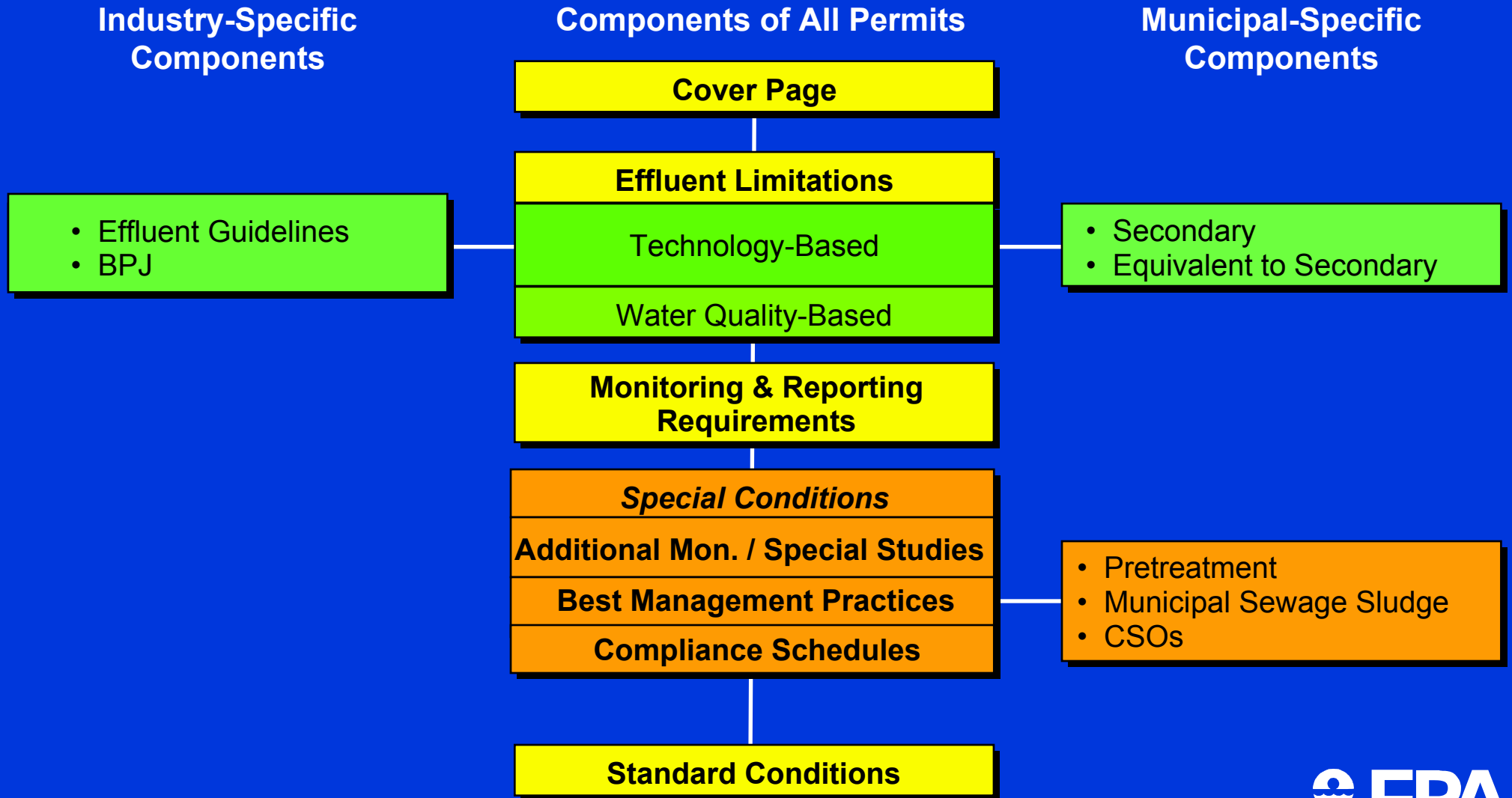


Special Conditions for Municipal Dischargers

Permit Components



Learning Objectives

- ◆ Define pretreatment program requirements
- ◆ Define sewage sludge requirements
- ◆ Define combined sewer overflow requirements

National Pretreatment Program

- ◆ Major goal is controlling discharges in order to:
 - Prevent interference with POTW processes
 - Prevent pass through of pollutants
 - Protect sludge management options
- ◆ Additional programmatic goals
 - Encourage recycling and reclamation
 - Ensure POTW personnel health and safety



Regulatory Requirements – General Pretreatment Regulations (40 CFR PART 403)

- ◆ **Elements:**
 - National Pretreatment Standards
 - Requirements for POTW and State programs
 - Industrial and POTW reporting requirements

- ◆ **Effluent Limitations Guidelines (40 CFR 405-471)**
 - Including categorical pretreatment standards



Pretreatment Program Development

- ◆ **Who is required to have a pretreatment program?**
 - **POTWs > 5 MGD with dischargers subject to standards**
 - **POTWs < 5 MGD with past problems**
 - **Unless State assumes total responsibility for program implementation (403.10(e))**

NPDES Permits Drive the Pretreatment Program by Requiring:

- ◆ Adequate legal authority
- ◆ Maintenance of industrial user inventory
- ◆ Development/implementation of local limits
- ◆ Individual control mechanisms be issued to all Significant Industrial Users (SIUs)*
- ◆ Compliance monitoring activities

*SIU defined as an industrial user: (1) that is subject to categorical pretreatment standards or (2) that discharges an average of 25,000 gallons per day or more of process water to the POTW or makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW or (3) is designated by the Control Authority



NPDES Permits Drive the Pretreatment Program by Requiring: (Continued)

- ◆ **Swift and effective enforcement**
- ◆ **Data management and recordkeeping**
- ◆ **Reporting to the approval authority (EPA or State)**
- ◆ **Resources**
- ◆ **Public participation**

Permits for Municipal Sewage Sludge (Biosolids)

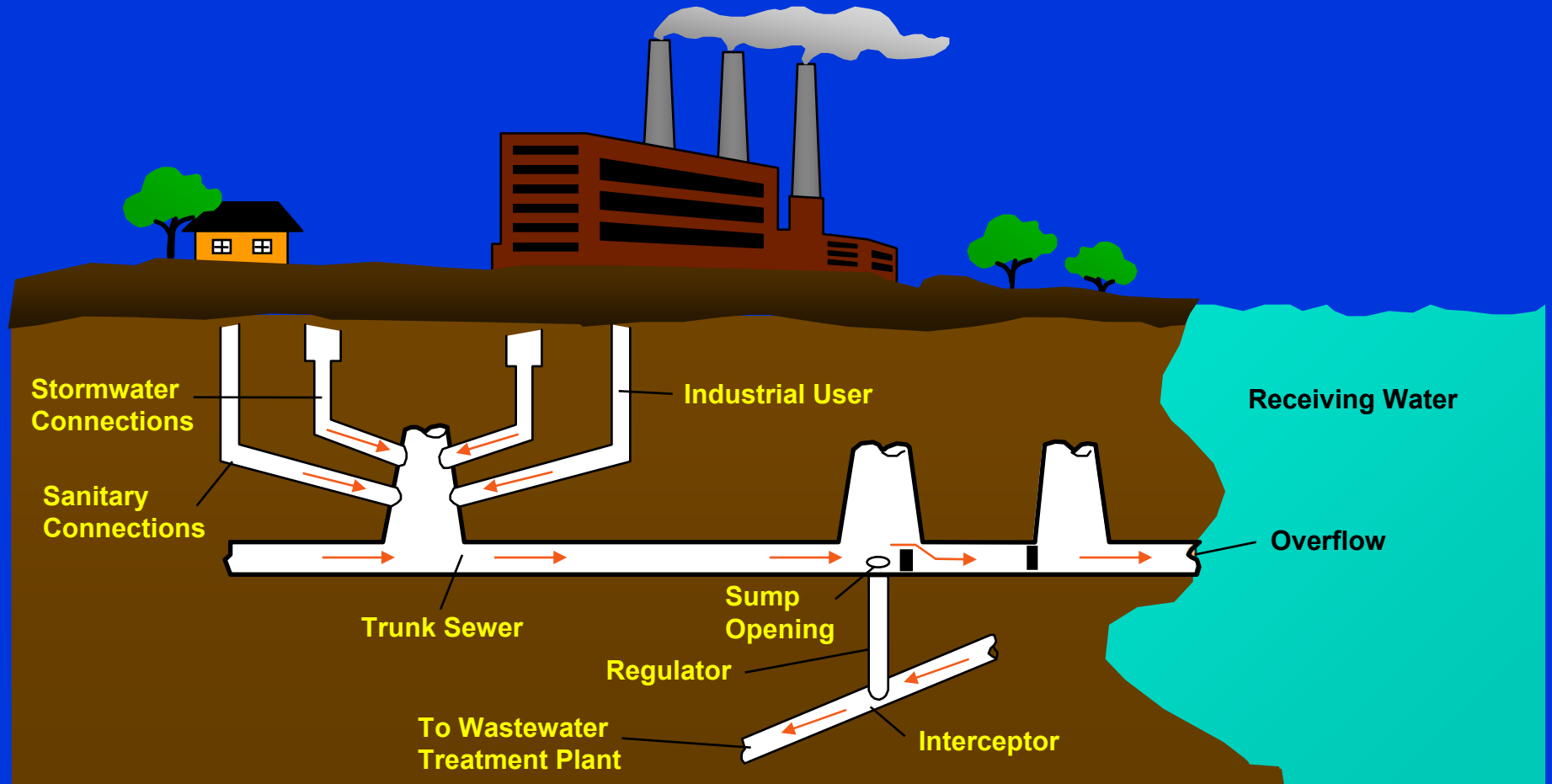
- ◆ Any Section 402 permit issued to a POTW should contain requirements for sewage sludge use and/or disposal
- ◆ 40 CFR Part 503 requirements should be incorporated into a permit for:
 - Incineration
 - Land application
 - Surface disposal



Permits for Municipal Sewage Sludge (Biosolids) (Continued)

- ◆ Other entities may be delegated responsibility to comply (40 CFR Part 503 standards and requirements may not all be placed in the POTW permit)
- ◆ Permits must contain:
 - Additional standard conditions
 - Special conditions

Typical Combined Sewer System Configuration



Requirements for Combined Sewer Overflows (CSOs)

- ◆ **Technology-based requirements (BPJ)**
 - BAT (none promulgated)
 - BCT (none promulgated)
- ◆ **Applicable State water quality standards**

Considerations for Developing Special Conditions for CSOs

- ◆ **Characteristics of the discharge**
- ◆ **Control technologies**
- ◆ **CSO control policy**

Overview of CSO Control Policy Approach

Time	Years after Phase I Permit Issuance			
	0	5	10+	
	NPDES Permit Requirements	Phase I	Phase II	Post Phase II
A. Technology-Based	◆ Nine minimum controls (NMC), at a minimum	◆ NMC, at a minimum	◆ NMC, at a minimum	◆ NMC, at a minimum
B. Water Quality-Based	◆ Narrative	◆ Narrative + performance-based standards	◆ Narrative + performance-based standards + numeric WQ-based effluent limits (as appropriate)	◆ Narrative + performance-based standards + numeric WQ-based effluent limits (as appropriate)
C. Monitoring	◆ Characterization, monitoring, and modeling of CSS	◆ Monitoring to evaluate WQ impacts ◆ Monitoring to determine effectiveness of CSO controls	◆ Post-construction compliance monitoring	◆ Post-construction compliance monitoring
D. Reporting	◆ Documentation of NMC implementation ◆ Interim long-term control plan (LTCP) deliverables	◆ Implementation of CSO controls	◆ Post-construction compliance monitoring reporting	◆ Post-construction compliance monitoring reporting
E. Special Conditions	◆ Prohibition of dry weather overflows (DWO) ◆ Development of LTCP	◆ Prohibition of DWO ◆ LTCP implementation schedule ◆ Reopener clause for WQS violations ◆ Sensitive area reassessment	◆ Prohibition of DWOs ◆ Reopener clause for WQS violations	◆ Prohibition of DWOs ◆ Reopener clause for WQS violations
	1994 - 1999	1999-2004	2004-2009	

