

Presentation: "Pre-treatment"

Speakers: Mr. Greg Arthur, EPA Region 9

Greg Arthur works in EPA's Office of Clean Water Act Compliance.

Handout: None

Notes:

Mr. Arthur discussed the purpose of pretreatment plants and the need to provide new wastewater control facilities to assist in safeguarding public health, the environment, public beaches, water quality, and the economy.

Discussion:

Regarding	Questions/Remarks	Response*
	(1) Where would one find the parameters for discharge from the treatment plant? (2) Where in the statutes would one find the allowable discharge limits for heavy metals or nitrates from a treatment plant?	(1) Parameters for discharge from the treatment plant would be found in the plant's NPDES permit. (2) The allowable discharge limits for heavy metals or nitrates may be found in the water quality standards that the state develops.
Metal Finishing	If a best available technology is applied and the standard still cannot be met, is the standard negotiable?	The standard is not negotiable; it is a national standard. There may be facilities that cannot meet the standard, and the problem is usually caused by variability. It is important to look at the variability of the operation itself. Also, you can put in an equalization tank and test prior to discharge.
	Is it mandatory for a POTW to have a pretreatment program?	The pretreatment rule recognizes that pretreatment itself is a complicated program. It requires application of technology-based standards, representative sampling, and treatment. It's actually fairly difficult for a city to do. The rule says that it's mandatory if the city discharges more than 5 mpg/day. This would include cities of 50,000, a midsize city like Reed, Yuba City, or Marysville. However, these cities were not intended to have to do pretreatment. It was intended that states would do the pretreatment; and states aren't doing it for smaller cities. We're working to provide the technical data needed for the state to do this or cause the state/city to do it. Either the state or EPA

Regarding	Questions/Remarks	Response*
		has to come up with the technical basis for all of these things; the smaller cities can't do it.