

# 2013 Compliance Assistance Conference

Ohio's Pretreatment Program



# Ohio's Pretreatment Program

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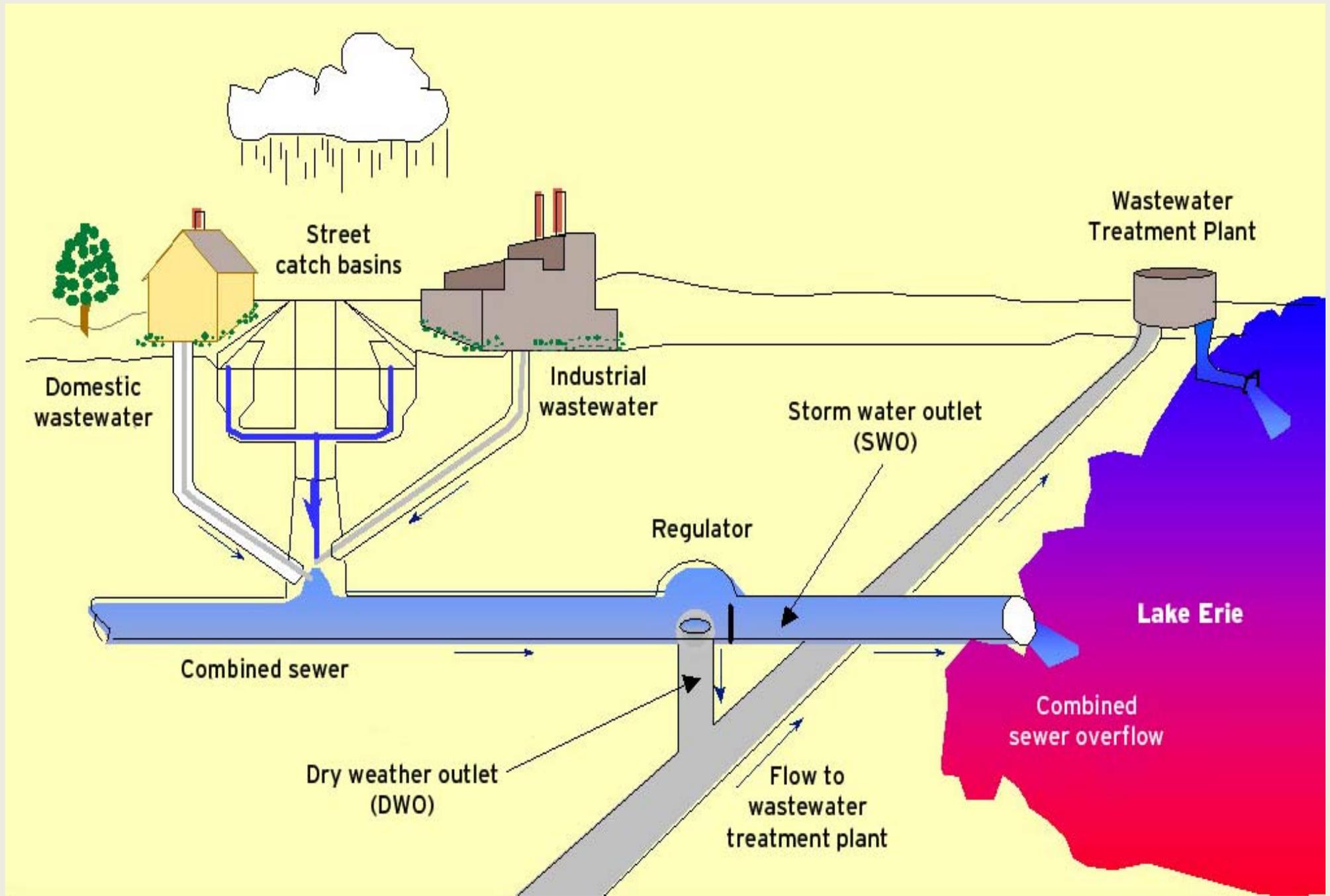
# Topics

- Where Does Your Wastewater Go?
- Introduction to Pretreatment
- How Pretreatment Regulations May be Applied to Your Business

# Where does your wastewater go?

- Gravity sewer
- Pumping station and force main
- Separate or Combined sewer systems
- Treatment Plant
- Receiving stream or lake











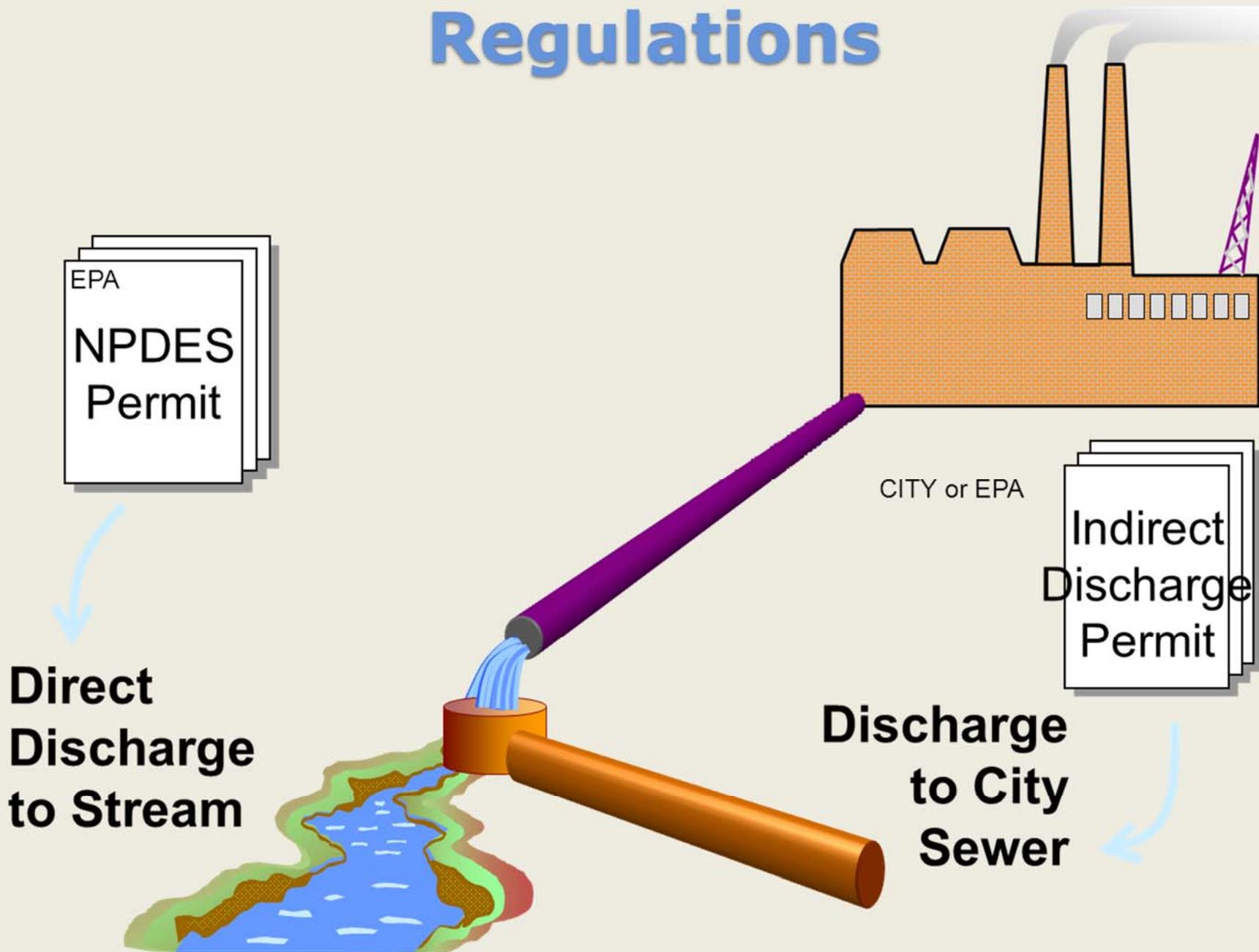
Receiving stream





# Introduction to Pretreatment

# Wastewater Discharges: Regulations



# What is Pretreatment?

- The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater before discharging to a POTW.
- The reduction or alteration may be obtained by physical, chemical, or biological treatment processes, BMPs, pollution prevention alternatives including process changes, material substitutions, improved operating practices and recycling, or by other means.

# Why do we have Pretreatment Regulations?

- POTWs are designed to convey and treat domestic sewage.
- Nondomestic discharges may obstruct flow in the collection system, disrupt treatment processes, pass into the receiving stream or contaminate sludge.

# Summary of Collection System Problems

- Pollutants entering storm sewers
- Spills
- Blocked sewer lines
- Failure of pump station controls or pumps
- Interference with combined sewer diversion devices
- Any of these can cause backups into homes or businesses or discharges at undesired locations or times



Spill Control?

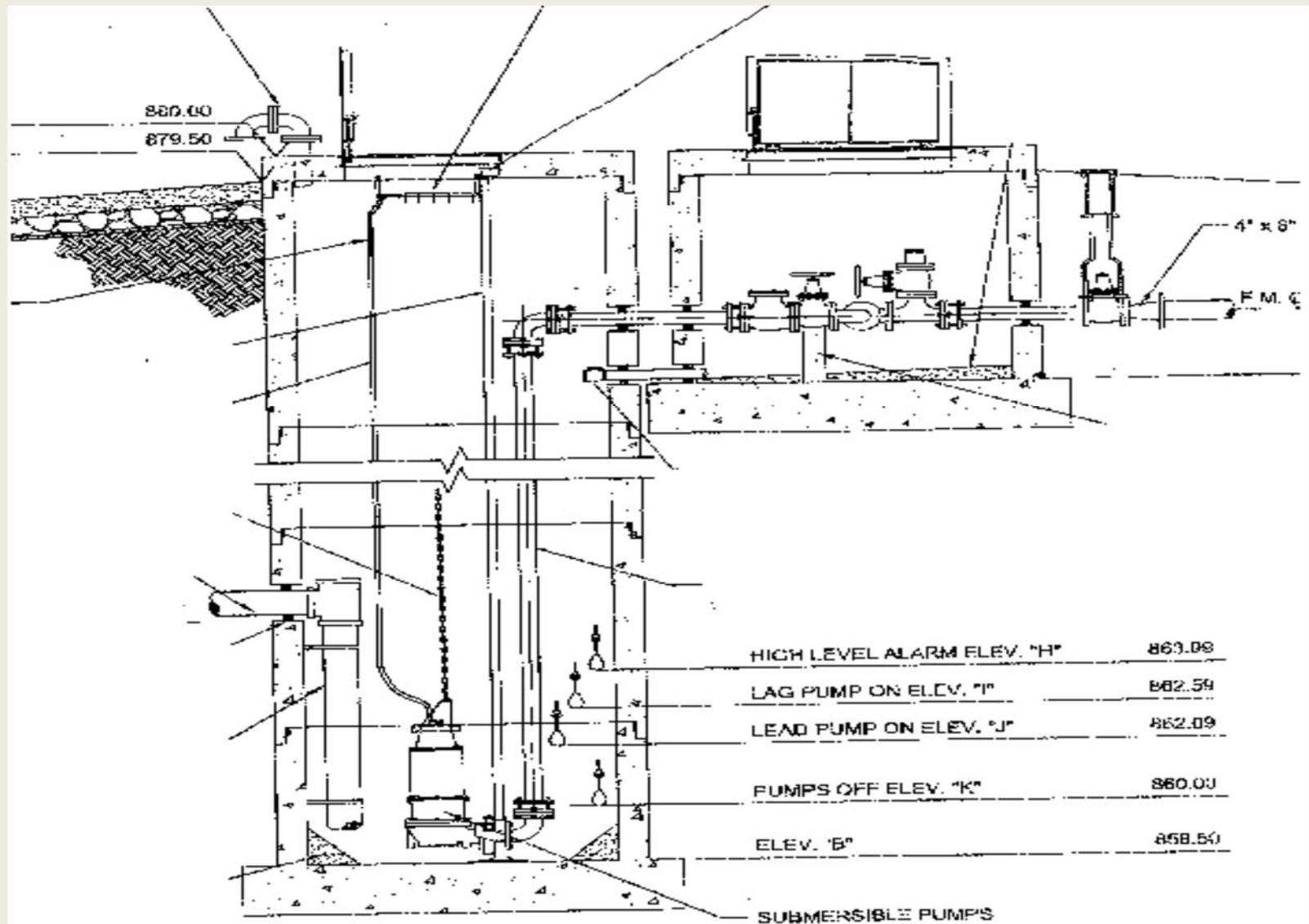


Grease in gravity  
line









SECTION "A-A"

PUMP STATION & VALVE VAULT



Grease at pump station





# Treatment Plant

- Preliminary physical treatment
- Biological conversion
- Separation
- Disinfection
- Sludge digestion



Detergent Slug  
in Clarifier

1 9:07 AM



# Summary of Treatment Problems

- Viscous materials or solid debris can overwhelm mechanical equipment
- Incompatible chemicals can pass into the receiving stream, and/or stress or kill biological processes
- Failure of upstream units likely to overwhelm downstream units
- Disinfection fails if separation fails
- Any of these can cause permit violations and put public health and water quality at risk.

# Application of Pretreatment Regulations

- State and Federal Rules
- Local ordinances
- Individual discharge permits
- General discharge permits
- Permit to Install - new construction or modifications

# Who Regulates Sewer Users?

Ohio EPA – OAC 3745-3

<http://www.epa.ohio.gov/portals/35/pretreatment/IDPprogram.pdf>

<http://www.epa.ohio.gov/dsw/pretreatment/district.aspx>

Local pretreatment programs approved by Ohio EPA; and/or

[http://www.epa.ohio.gov/dsw/pretreatment/approved\\_program\\_contacts.aspx](http://www.epa.ohio.gov/dsw/pretreatment/approved_program_contacts.aspx)

# Who Regulates Sewer Users (cont).

- USEPA – 40 CFR 403
- Third parties via courts - can sue for enforcement or damage claims

# Individual Indirect Discharge Permits

- Ohio EPA requires Significant Industrial Users to obtain a discharge permit
- Local programs may require other Industrial User classes to obtain a permit in addition to SIUs

# Significant Industrial User

- Industrial User which:
- Is subject to Federal Categorical Pretreatment Standards;
- Discharges  $>25,000$  gals/day (process wastewater); or
- Contributes  $>5\%$  of flow or organic load to POTW; or
- Has a reasonable potential for adversely affecting operation of POTW

# How Is a Significant Industrial User Identified?

- Inspections, permit applications, surveys
- Adverse affects on POTW may be traced back to a user.

# Individual Indirect Discharge Permit

- Effluent limits and monitoring
- Reporting requirements for sampling results
- Notification requirements, standard conditions
- Schedule of compliance
- Management practices

# General Permits

- Multiple dischargers covered under one identical permit
- Limits, terms and conditions, management practices – similar to individual permits

# NonSignificant Users

- All nonresidential, nonsignificant dischargers
- No prohibited discharges, comply with local ordinance and PTI rules OAC 3745-42
- Proactive measures or prompt corrective measures may help you stay “nonsignificant”

# Specific Prohibitions 40 CFR 403.5, OAC 3745-3-04

- Toxic materials
- Fire or explosion hazards
- Solid or viscous pollutants that may obstruct flow
- Corrosive wastes
- Slug loads

# Permit To Install

- New construction plan review
- New treatment systems
- Modification of existing treatment systems
- OAC 3745-42
- Rule applies to both significant and non-significant sewer users

# Where to Get a Permit

- POTW with approved pretreatment program – Contact the POTW
- POTW without an approved program – Contact Ohio EPA
- Unsure if your POTW has an approved program – Call me.

# Questions?

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Other Ohio EPA District Contacts

<http://www.epa.ohio.gov/dsw/pretreatment/district.aspx>