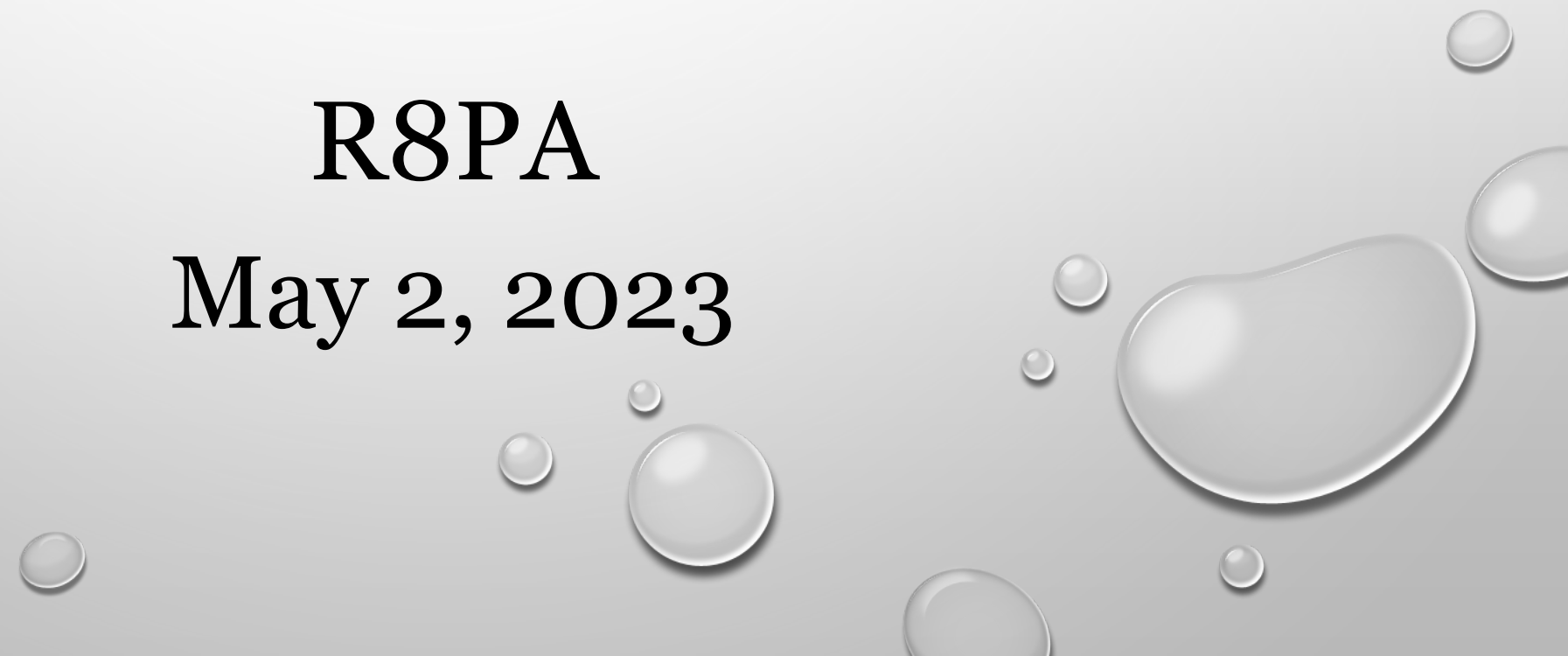




# EPA Update

R8PA

May 2, 2023



# Pretreatment Standards

- **Categorical Pretreatment Standards**

<https://www.epa.gov/eg/industrial-effluent-guidelines>

- **General and Specific Prohibitions**

<https://www.epa.gov/npdes/pretreatment-standards-and-requirements-general-and-specific-prohibitions#genproh>

- **Local Limits – BMPs**

# Electronic Code of Federal Regulations (CFR)

e-CFR

<https://www.ecfr.gov/>

# ELG Rulemaking workgroups

- PFAS Manufacturers (feedstock) and Formulators (products from feedstock)
  - PFAS Analytical Method will be finalized.
- PFAS Metal Finishers
- Meat and Poultry
- Steam Electric/316b

# PFAS Manufacturers and Formulators/Processors Rule

## Proposal in Summer 2024

- Organic Chemicals, Plastics and Synthetic Fibers (OCPSF)  
Rule – 40 CFR 414
- Manufacturing – raw material feedstock
  - Chemours, 3M and Daikin
- Formulators – processing raw PFAS feedstock into intermediate or commercial product
- Will also finalize the Draft PFAS 1633 method

# PFAS Metal Finishing Rule

- Metal Finishing Rule – 40 CFR 433
  - 6 core and 40 ancillary process operations
- Chromium electroplating and anodizing operations
  - PFAS used for mist fume suppression to control air emissions
- Proposal – Summer 2025

# Steam Electric Rule - 40 CFR Part 423

- EPA promulgated revisions to the Steam Electric ELGs in November 2015; compliance with new, more stringent PSES required by November 2018
- EPA proposed revisions to the 2015 rulemaking on November 22, 2019
- August 31, 2020, finalized a rule revising the regulations for the Steam Electric Power Generating category . The rule revises requirements for two specific waste streams produced by steam electric power plants: flue gas desulfurization (FGD) wastewater and bottom ash (BA) transport water.
- **2021 – Revising the “Reconsideration of the Steam Electric Rule”**

# Meat and Poultry Products

- 40 CFR 432
- Options Selection Meeting with the EPA Administrator this week. Proposed Rule should be published this Fall.
- Public comment period for draft questionnaire ended on April 15, 2022.



# Multi-Industry PFAS Study

- OCPSF – 40 CFR 414
- Metal Finishing – 40 CFR 433
- Electroplating – 40 CFR 413
- Landfills – 40 CFR 445
- Pulp Paper and Paperboard – 40 CFR 430
- Leather Tanning and Finishing – 40 CFR 425
- Plastics Molding and Forming – 40 CFR 463
- Textile Mills – 40 CFR 410
- Paint Formulating – 40 CFR 446
- Commercial Airports – 40 CFR 449

# Dental Amalgam

- July 14, 2017 – Compliance Deadline
- *New Sources* – upon discharge and submittal of reports within 90 days
- *Existing Sources* – July 14, 2020 compliance and submittal of reports by October 12, 2020

# Dental Amalgam

- Dental Amalgam Rule requires the following for dental facilities that place or remove amalgam:
  - Install an ISO 11143-compliant amalgam separator (or equivalent device)
  - Comply with the following two Best Management Practices:
    - Prohibition of oxidizing or chlorine line cleaner chemicals, and
    - Ensure all amalgam process wastewater, including chair side traps, screens, vacuum pump filters, dental tools, cuspidors or collections devices are treated through the amalgam separator.

# Electronic Reporting

- Federal Register – October 22, 2015
- Effective Date – December 21, 2015
- Reduces burden of existing paper-based reporting from regulated facilities and reduces third-party data entry errors by instead requiring electronic data submissions

# Electronic Reporting

- Phase 1 – DMR Submissions & Biosolids Reports (21 Dec 2016)
- Phase 2 – General Permit and Program Reports (21 Dec 2020)
- EPA proposes to change deadline of phase 2 to December 21, 2023...and again to December 2025
- Will provide EPA and States more time to develop Phase 2 e-reporting tools and systems.

# Pretreatment Annual Reports

- Pilot Project
- Region 8 input – EPA/States/Local Programs
- History and Current Annual Report Process (EPA DI states)
- Use of Annual Reports



# Annual Reports Preparation

- Project to use NET for CY23 Annual Reports
- Delegation for NET submittal
- Training on NET Access and Usage
- Local Input on Development of e-annual report



# Cross Media Electronic Reporting Rule (CROMMER)

- Allows a Pretreatment Program to receive electronic reports
  - PDFs – courtesy copy
  - Requires a certified electronic reporting system
  - Modification of the approved Pretreatment program

# CROMMER Roles

- **Control Authority**

- Verify legal validity of electronic signatures
- Prepare CROMMER system documentation
  - CDX
  - EPA-vetted Off the Shelf Systems (COTS)
  - Custom or Hybrid Systems
- Evaluate implementation procedures/resources/legal authority

# CROMMER Roles

- **EPA CROMMER Office**
  - Evaluate application/e-reporting system submittal and certify Electronic Reporting System

# CROMMER Roles

- **Approval Authority – EPA/States**
  - Evaluate and Approve Program modification
    - Legal authority
    - Procedures
    - Resources/funding

# PRETREATMENT HAPPENINGS!!!

- EPA HQ Newsletter
- Events/Trainings/General Announcements

<https://lp.constantcontactpages.com/su/nvNK9pJ/PretreatmentHappenings>

You wouldn't like me  
when I'm angry...

Because I always back up  
my rage with facts and  
documented sources.

*-The Credible Hulk*

Al Garcia

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