



Connecticut Department of Energy and Environmental Protection



Proposed Changes to Connecticut's Pretreatment Program

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Gina McCarthy Auditorium
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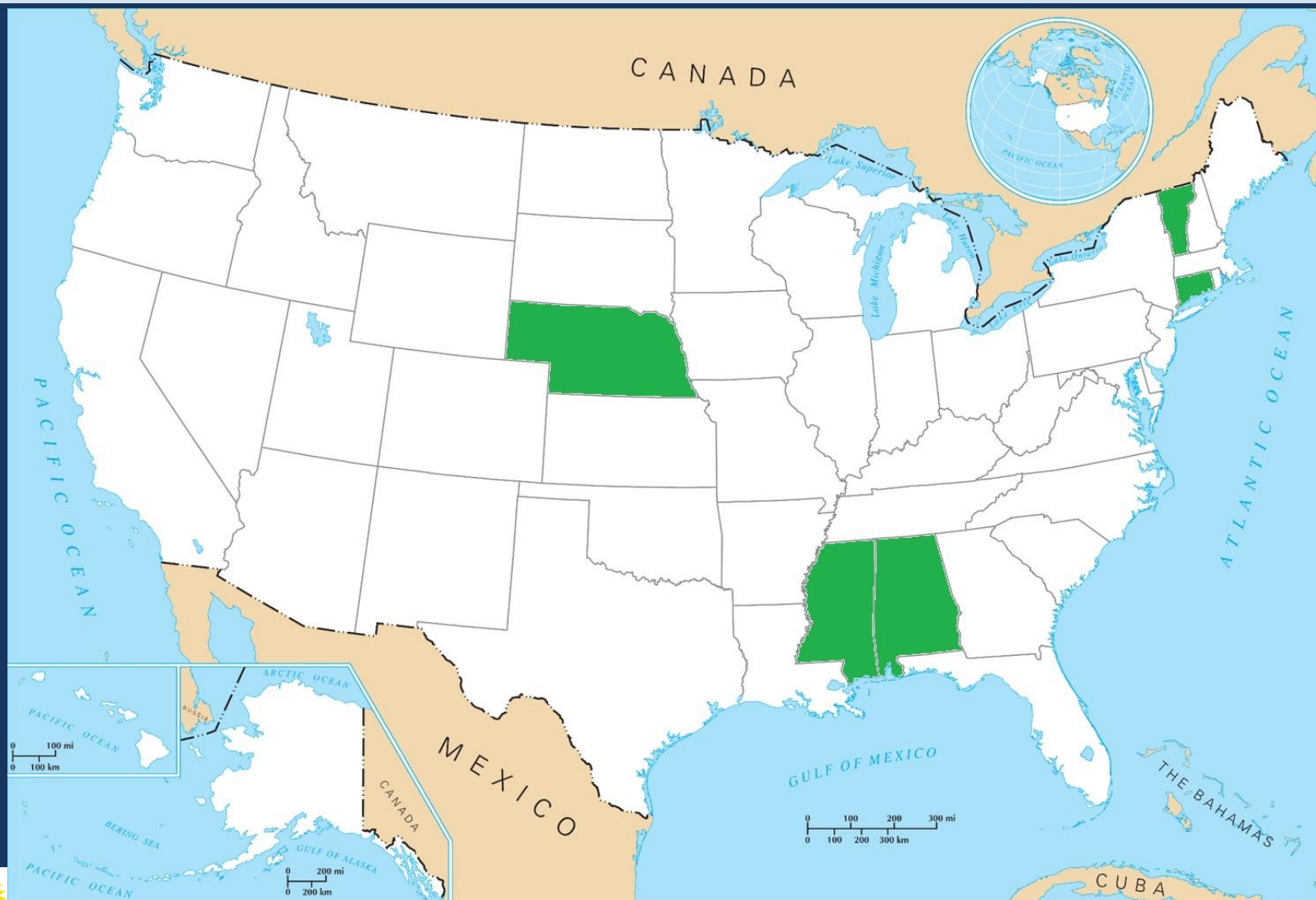
Connecticut Department of Energy and Environmental Protection

Agenda

- Background on CT's Pretreatment Program
- Key Concepts
- Proposed SIU General Permit
- Proposed MISC General Permit
- Public Participation Process



State Pretreatment Programs



Connecticut Department of Energy and Environmental Protection

CT's Pretreatment Program

- CT authorized by EPA on June 3, 1981
- One of five approved state programs pursuant to 40 CFR 403.10(e)
- Other four states are Alabama, Mississippi, Nebraska and Vermont
- Pretreatment program locally administered in all other states
- No additional federal funding for program



Key Concepts

- Indirect Discharge – The introduction of a discharge into a POTW from a non-domestic source.
- Industrial User (IU) or Miscellaneous Industrial User – A source of *Indirect Discharge*.



Key Concepts

- CT defines Significant Industrial User or SIU as:
 - All *Industrial Users* subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, subchapter N; and
 - any other *Industrial User* that: discharges a cumulative maximum of 25,000 gpd or more of *process wastewater* to the POTW (excluding sanitary, non-contact cooling and boiler blowdown); contributes a process wastestream which makes up 5% or more of the average dry weather hydraulic or organic capacity of the POTW; or



Key Concepts

- Significant Industrial User or SIU – (*continued*)
 - is designated as such by the Commissioner on the basis that the *Industrial User* has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement (in accordance with 40CFR.8(f)(6))



Key Concepts

- **Process Wastewater** – Any wastewater which, during manufacturing, commercial, mining, or silvicultural activities, comes into direct contact with, or results from the production, use or handling of any process, raw material or intermediate or final product, byproduct or wasteproduct. This does not include cooling water (non-contact), domestic sewage, blowdown from heating and cooling equipment, stormwater, or wastewater from agricultural activities. [RCSA 22a-430-3(a)(3)]



Miscellaneous GP for Industrial Users

- Eligibility

- The source (i.e. facility) is not deemed by DEEP to be a Significant Industrial User;
- Does not hold an individual discharge permit
- All discharges from non-SIUs currently covered by MISC GP and Vehicle Maintenance GP;



Miscellaneous GP for Industrial Users

- **Group I: Process Wastewater Discharges Cumulatively < 25,000 GPD**
 - Contact cooling & heating
 - Cutting and grinding
 - Non-destruct testing rinsewater
 - Printing and photo processing
 - Tumbling and cleaning
 - Water treatment
 - Commercial laundry
 - Food processing
 - Reverse osmosis reject
 - Other process wastewaters, including:
 - (i) process wastewaters which are hauled by a Connecticut licensed transporter to a POTW that has been approved by the commissioner to accept over-the-road wastewater (a list of POTWs that have been approved by the commissioner to accept over-the-road wastewater is described in Appendix E of this general permit);
 - (ii) process wastewaters requiring a variance; and
 - (iii) other wastewaters determined by the commissioner to be process wastewaters.



Miscellaneous GP for Industrial Users

- **Group II: Non-Process Wastewater Discharges Cumulatively – All Flows**
 - Air compressor condensate & blowdown
 - Boiler blowdown
 - Building Maintenance
 - Fire suppression testing
 - Hydrostatic pressure testing
 - Non-contact cooling
 - Potable water system maintenance/sampling
 - Swimming pool
 - Vehicle maintenance
 - Other non-process wastewaters, including:
 - (i) non-process wastewaters which are hauled by a Connecticut licensed transporter to a POTW that has been approved by the commissioner to accept over-the-road wastewater (a list of POTWs that have been approved by the commissioner to accept over-the-road wastewater is described in Appendix E of this general permit);
 - (ii) non-process wastewaters requiring a variance; and
 - (iii) other wastewaters determined by the commissioner to be non-process wastewaters.



Miscellaneous GP for Industrial Users

- Registration
 - Must be completed by all eligible Industrial Users and filed with POTW Authority, not with CT DEEP.
 - Applicable fee paid to POTW Authority
 - Any discharge for which a variance is sought or treatment is required must be certified by Qualified P.E., or Qualified CHMM in accordance with Section 4(c)(2)(R) of general permit and included with registration.
 - Discharge is not authorized without the written approval of the POTW Authority.



Miscellaneous GP for Industrial Users

Registration Requirements	Discharge Group	Total Maximum Daily Flow Thresholds	Certification Requirements	Fees
Registration with Approval (Submitted to POTW Authority)	I—Process Wastewater	Cumulative Flow < 25,000 gpd; contributes < 5% of the average dry weather hydraulic or organic capacity of the receiving POTW Treatment plant; and is not otherwise designated an SIU by the Commissioner on the basis of reasonable potential for adversely affecting the receiving POTW's operation or for violating any federal or state pretreatment standard or requirement.	Certification by Qualified CT P.E., or Qualified CHMM in accordance with Section 4(c)(2)(R) for wastewater requiring a variance or treatment to meet effluent limitations.	As determined by POTW Authority, no fees required by DEEP
	II—Non-process Wastewater	All Flows		



Miscellaneous GP for Industrial Users

- Effluent Limits
 - Applicable to all discharges, except as noted
 - GP lists some POTWs with more restrictive limits
 - POTW Authority may prescribe other limits that are more restrictive
- Prohibitions and Best Management Practices
 - Designed to protect the receiving POTW from slug discharges, pass-through, and interference with treatment operations and proper sludge management.



Miscellaneous GP for Industrial Users

- Monitoring and Reporting Requirements
 - Monitoring requirements based on category of discharge
 - Frequency of monitoring based on category and volume of flow specified in GP
 - Submitted to POTW Authority, not to DEEP



Miscellaneous GP for Industrial Users

Discharge Group	Total Maximum Daily Flow Thresholds per Category of Wastewater	Minimum Frequency of Pollutant Monitoring ^{1,2}
Group I – Process Wastewaters (except as noted below)	Flow < 1,000 gpd	None
	1,000gpd ≤ Flow < 10,000gpd	Quarterly
	10,000gpd ≤ Flow < 25,000gpd	Monthly
Group I -- Food Processing, Commercial Laundry, Reverse Osmosis Reject Water	Flow < 25,000 gpd	None
Group II -- Air Compressor Condensate, Boiler Blowdown, Non-contact Cooling Water, Hydrostatic Pressure Testing Wastewater	Flow < 10,000 gpd	None
	Flow ≥ 10,000 gpd	Quarterly
Group II -- Building Maintenance, Fire Suppression Testing, Swimming Pool, Vehicle Maintenance, Potable Water System Maintenance, etc. ³	All Flows	None



Significant Industrial User GP

- Eligibility
 - Metal Finishing under 40 CFR 413 & 433
 - The source (i.e. facility) is deemed by DEEP to be a Significant Industrial User
 - All discharges from SIUs currently covered under MISC GP or Vehicle Maintenance GP
 - May also hold individual discharge permit



Significant Industrial User GP

- **Group I: Process Wastewater Discharges Cumulatively \geq 25,000 GPD**
 - Contact cooling & heating
 - Cutting and grinding
 - Non-destruct testing rinsewater
 - Printing and photo processing
 - Tumbling and cleaning
 - Water treatment
 - Commercial laundry
 - Food processing
 - Reverse osmosis reject
 - Other process wastewaters, including:
 - (i) process wastewaters which are hauled by a Connecticut licensed transporter to a POTW that has been approved by the commissioner to accept over-the-road wastewater (a list of POTWs that have been approved by the commissioner to accept over-the-road wastewater is described in Appendix E of this general permit);
 - (ii) process wastewaters requiring a variance; and
 - (iii) other wastewaters determined by the commissioner to be process wastewaters.



Significant Industrial User GP

- **Group II: Non-Process Wastewater Discharges Cumulatively – All Flows**
 - Air compressor condensate & blowdown
 - Boiler blowdown
 - Building Maintenance
 - Fire suppression testing
 - Hydrostatic pressure testing
 - Non-contact cooling
 - Potable water system maintenance/sampling
 - Swimming pool
 - Vehicle maintenance
 - Other non-process wastewaters, including:
 - (i) non-process wastewaters which are hauled by a Connecticut licensed transporter to a POTW that has been approved by the commissioner to accept over-the-road wastewater (a list of POTWs that have been approved by the commissioner to accept over-the-road wastewater is described in Appendix E of this general permit);
 - (ii) non-process wastewaters requiring a variance; and
 - (iii) other wastewaters determined by the commissioner to be non-process wastewaters.



Significant Industrial User GP

- Registration
 - Must be completed by all eligible Significant Industrial Users and filed with CT DEEP for review and written approval after POTW Authority written approval.
 - Applicable fee paid to CT DEEP
 - Any discharge for which a variance is sought or treatment is required must be certified by Qualified P.E., or Qualified CHMM in accordance with Section 4(c)(2)(R) of general permit and included with registration.



Significant Industrial User GP

- Effluent Limits
 - Applicable to all discharges, except as noted
 - GP lists some POTWs with more restrictive limits
 - POTW Authority may prescribe other limits that are more restrictive
- Prohibitions and Best Management Practices
 - Designed to protect the receiving POTW from slug discharges, pass-through, and interference with treatment operations and proper sludge management.



Significant Industrial User GP

- Monitoring and Reporting Requirements
 - Monitoring requirements based on category of discharge identified in GP
 - Frequency of monitoring based on category and volume of flow specified in GP
 - Submitted to DEEP and POTW Authority
 - Electronic reporting for certain discharges



Significant Industrial User GP

Discharge Group	Total Maximum Daily Flow Thresholds per Category of Wastewater	Minimum Frequency of Pollutant Monitoring ^{1,2}	Electronic Reporting
Group I – Process Wastewaters (except as noted below)	Flow < 1,000 gpd	None	No
	1,000gpd ≤ Flow < 10,000gpd	Quarterly	Yes
	Flow ≥ 10,000gpd	Monthly	Yes
Group I -- Food Processing, Commercial Laundry, Reverse Osmosis Reject Water	Flow < 25,000 gpd	None	No
	Flow ≥ 25,000gpd	Quarterly	Yes
Group II -- Air Compressor Condensate, Boiler Blowdown, Non-contact Cooling Water, Hydrostatic Pressure Testing Wastewater	Flow < 10,000 gpd	None	No
	Flow ≥ 10,000 gpd	Quarterly	No
Group II -- Building Maintenance, Fire Suppression Testing, Swimming Pool, Vehicle Maintenance, Potable Water System Maintenance, etc. ³	All Flows	None	No



Questions?

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www.ct.gov/deep/stormwater

www.ct.gov/deep/publicnotices





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