

Discharging to a POTW

Nebraska Pretreatment Permits

Department of Environmental
Quality



What is Pretreatment?

- A component of the NPDES Permit Program
- General Pretreatment Regulations at 40 CFR Part 403
 - June 26, 1978
- Title 119, Chapter 26
 - General Pretreatment Regulations for Existing and New Sources of Pollution



Program Purpose

- Addresses indirect discharges from industries to publicly owned treatment works (POTWs)
- Requires industrial and commercial dischargers, called industrial users (IUs), to obtain permits or other control mechanisms to discharge wastewater to the POTW.

POTW Responsibility

- NPDES Applications
- Reporting
- Ordinances

Who Needs a Pretreatment Permit?

- A Significant Industrial User
 - Defined in Title 119, Chapter 1
 - 105 “Significant Industrial User” means:
 - 105.01 All industrial users subject to Categorical Pretreatment Standards; and
 - 105.02 Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling and boiler blowdown wastewater); contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the director 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.
 - 105.03 Upon a finding that an industrial user has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the director may at any time determine that such industrial user is not a significant industrial user.

General Prohibitions

- A user may not introduce into a POTW any pollutant(s) which cause pass through or interference. These general prohibitions and the specific prohibitions in 002.02 apply to each user introducing pollutants into a POTW whether or not the user is subject to other national pretreatment standards.

Specific Prohibitions

- Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in Title 128 – Nebraska Hazardous Waste Regulations;
- Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges;
- Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;
- Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW;
- Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40 °C (104 °F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits;
- Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;
- Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- Any trucked or hauled pollutants, except at discharge points designated by the POTW.
- Affirmative Defenses. A user shall have an affirmative defense in any action brought against it alleging a violation of the general prohibitions and the specific prohibitions of this section where the user can demonstrate that it did not know or have reason to know that its discharge, alone or in conjunction with a discharge or discharges from other sources, would cause pass through or interference.

Permits Limits

- 40 CFR Industry Specific Category
- Local Limits
- Water Quality

Permit Conditions

- Slug load language
- 90 day compliance reports
- Best management practices

Upcoming

- Headworks Calculations
- Title 119 Updates

Permitting and Compliance Issues

- Upset
- Interference
- Pass through

Permitting and Compliance Issues

- Setting Local Limits
- Changing Permit Limits
- Conservative Pollutants
- NPDES Construction Permits
 - Title 123 Requirements

Contact Information

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Questions?

