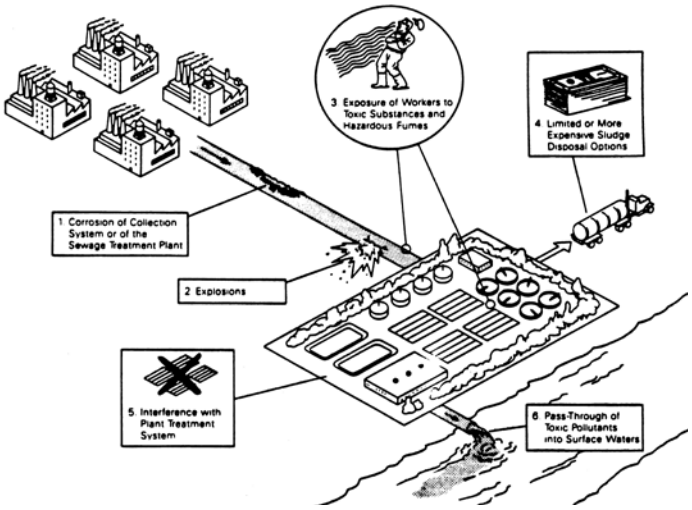
Introduction



This manual is intended to provide guidance to Florida public utilities and Control Authority personnel responsible for the development and implementation of a local pretreatment program. Use of the manual is intended to simplify program development, reduce overall development cost, enhance consistency between programs, and simplify program inspections and audits by Florida Department of Environmental Protection (DEP) personnel. Site-specific questions are likely beyond the scope of this manual and should be directed to DEP personnel where appropriate; existing EPA guidance may be referenced herein (see Appendix 1-A). A list of acronyms and definitions is provided as Appendix 1-B.

Wastewater Facilities (WWF) or Publicly owned treatment works (POTWs) collect and treat wastewater discharged from residences, commercial establishments, and industrial facilities. After treatment, effluent is discharged to creeks, streams, rivers, bays, oceans, etc. and controlled under the National Pollutant Discharge Elimination System (NPDES) Permitting Program, as defined in the Clean Water Act (CWA). Treated wastewater can also be reused to irrigate residential lawns, golf courses, or agricultural areas. For example, the City of St. Petersburg operates a separate wastewater distribution system to provide irrigation water for parks, golf courses and certain residential areas. Some WWFs and POTWs use specially constructed disposal wells to inject the treated effluent into underground geologic formations. These wells are designed so that the effluent is injected into deep isolated formations that are below and physically separated from all potential underground sources of drinking water (USDWs). Florida has more non-hazardous, municipal underground injection wells than any other State. NPDES permits contain provisions developed to maintain and restore the integrity of the receiving water. Most WWFs and POTWs are not designed to convey and treat wastewater containing high strength wastestreams and wastestreams containing nonconventional pollutants (such as

Interference:

A discharge that alone or in conjunction with a discharge or discharges from other sources:

- both inhibits or disrupts the wastewater facility (WWF), its treatment processes or operations, or its domestic wastewater residual processes, use, or disposal; and is a cause of a violation of any requirement of the WWF's permit (including an increase in the magnitude or duration of a violation); or
- prevents use or disposal of domestic wastewater residuals in compliance with local regulations or rules of DEP and Chapter 403 of the Florida Statutes.

Pass Through:

A discharge that exits the WWF into waters of the State in quantities or concentrations that, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the WWF's permit (including an increase in the magnitude or duration of a violation).

from industrial sources). To control potential problems from these discharges, EPA created the General Pretreatment Regulations. These regulations, published at 40 Code of Federal Regulations (CFR) Part 403, identify responsibilities of Federal, State, and local government, industry, and the public to implement National Pretreatment Standards to:

- prevent the introduction of pollutants into publicly owned treatment works (POTWs) that will interfere with the operation of a POTW, including interference with its use or disposal of municipal sludge;
- prevent the introduction of pollutants into POTWs that will pass through the treatment works or otherwise be incompatible with such works; and
- improve opportunities to reuse reclaimed water, biosolids, and industrial wastewaters and sludges.

As such, the National Pretreatment Program (pretreatment program) is designed to reduce the amount of pollutants discharged by industry and other non-domestic wastewater sources into municipal sewer systems, and thereby, reduce the amount of pollutants released into the environment from wastewater treatment plants. The pretreatment program is structured to control sources of such pollutants, i.e., industrial users (IUs), through three levels of regulatory supervision: EPA, Approval Authorities, and Control Authorities. Approval Authorities oversee Control Authorities while Control Authorities regulate industrial users. An Approval Authority can denote EPA or a delegated State (i.e., a State that has developed an approved pretreatment program in accordance to 40 CFR 403.10), while a Control Authority can denote EPA, a delegated State, or a public utility. Specific responsibilities of each of these three bodies are detailed below.

- **EPA**

  Headquarters

  ◊ Oversee program implementation at all levels
  ◊ Develop and modify regulations for the pretreatment program
  ◊ Develop policies to clarify and further define the program
  ◊ Develop technical guidance for program implementation
  ◊ Initiate enforcement actions as appropriate.

  Regions

  ◊ Fulfill Approval Authority responsibilities for States without program delegation
  ◊ Oversee State program implementation
  ◊ Initiate enforcement actions as appropriate.

- **Approval Authority (DEP)**

  ◊ Notify WWFs of their responsibilities
  ◊ Review and approve public utility's pretreatment programs
  ◊ Review modifications to categorical pretreatment standards
  ◊ Oversee WWF/public utility program implementation

- ◊ Provide technical guidance to WWFs/public utilities
- ◊ Regulate industries discharging to WWFs without pretreatment programs
- ◊ Initiate enforcement actions, against noncompliant public utilities, WWFs or industries.

- **Control Authorities**
  - ◊ Develop and maintain an approved pretreatment program
  - ◊ Evaluate compliance of regulated industrial users
  - ◊ Initiate enforcement action against industries as appropriate
  - ◊ Submit reports to Approval Authority
  - ◊ Develop local limits (or demonstrate why they are not needed)
  - ◊ Develop and implement an enforcement response plan.

Public Utility Any state, county, or municipality owning, managing, controlling, or operating a domestic wastewater facility (WWF), or proposing to construct a domestic WWF that provides or proposes to provide wastewater service.*[subsection 62.625.200(21),F.A.C.]*

Wastewater Facility (WWF) Any facility which discharges wastes into waters of the State or which can reasonably be expected to be a source of water pollution and includes any or all of the following: the collection and transmission system, the wastewater treatment works, the reuse or disposal system and the biosolids management facility. *[subsection 62.625.200(29), F.A.C.]*

As noted above, an Approval Authority can denote EPA or a State, where the State has obtained approval from EPA in accordance to 40 CFR 403.10 to implement a State Pretreatment Program. The State of Florida (hereinafter referred to as State) received such approval on May 1, 1995. As part of obtaining program approval, the State established the legal authority to implement a State Pretreatment Program (Florida Statute Part 403; excerpts provided as Appendix 1-C) and established regulations for program implementation in the form of Chapter 62-625 of the Florida Administrative Code (F.A.C.) (provided as Appendix 1-D; reference cite comparisons between Chapter 62-625, F.A.C and 40 CFR Part 403 provided as Appendix 1-E). In accordance to subsection 62-625.500(1), F.A.C., public utilities must develop and implement a pretreatment program where:

- The public utility receives pollutants from industrial users which pass through or interfere with the operation of the WWF or are otherwise subject to pretreatment standards;
- The public utility discharges to surface waters of the State or is required to implement a pretreatment program in accordance with Chapter 62-610, F.A.C., or 40 CFR Parts 146.15 and 146.16; and
- The public utility owns or operates one or more WWFs with a total combined design flow greater than 5 million gallons per day (mgd).

The Department shall also require that a public utility that owns or operates one or more WWFs with a total combined design flow of 5 mgd or less to establish a pretreatment program if it finds the nature or

volume of the industrial influent, treatment process upsets, violations of the WWF effluent limitations, contaminations of domestic wastewater biosolids, or other circumstances require a pretreatment program in order to prevent interference with the WWF or pass through. It should be noted that WWFs required to implement a pretreatment program in accordance with Chapter 62-610, F.A.C., or 40 CFR Parts 146.15 and 146.16 shall not be required if the public utility can provide an affirmative demonstration in accordance with subsection 62-610.330(2), F.A.C., or 40 CFR Part 146.15(e)(1) that the WWF has no significant industrial users.

Public utilities are required to develop an approved pretreatment program as a condition of their WWF's(s') NPDES permit(s); standard language for such a requirement is provided as Exhibit 1-1. Likewise, once developed and approved, the requirement for implementation of the program will be included as a condition of their WWF's(s') NPDES permit(s) (see Exhibit 1-2). Pretreatment program development includes public utilities establishing legal authority, procedures, funding, local limits, an enforcement response plan, and a list of SIUs as outlined in subsection 62-625.500(2), F.A.C. The public utility's approved pretreatment program document, and amendments thereto, detail the site-specific conditions of these elements and how the public utility will implement and enforce these provisions. Chapter 2 of this guidance outlines Federal and State requirements for development of a local pretreatment program and details the State approval process. Once approved, the public utility is both charged with implementation of the approved program and the periodic evaluation and modification to the original pretreatment program document in response to changed conditions. Chapters 3-10 discuss local pretreatment program development and/or implementation activities. State evaluation checklists used in DEP's pretreatment program review/approval process are provided as appendices to the Chapters, where applicable. These items should be referenced by public utilities whether in development of a new program, or the periodic re-evaluation (and modification) of an existing program, to verify minimum program requirements are met.

Exhibit 1-1, Example Florida Permit Language for Development of a Local Pretreatment Program

Industrial Pretreatment Program Development Requirements

1. The permittee shall develop an industrial pretreatment program in accordance with Chapter 403, F. S., and Chapter 62-625, F.A.C. This program shall enable the permittee to detect and enforce violations of Categorical Pretreatment Standards promulgated under Sections 307(b) and (c) of the Clean Water Act (the Act) and prohibitive discharge standards as set forth in Rule 62-625.400, F.A.C.

   The pretreatment program shall be developed and submitted to the address specified in Permit Condition VII._. according to the following schedule:

1.	Submit an industrial user survey developed in accordance with Rule 62-625.500(2)(b)1.-3. and Rule 62-625.500(2)(e), F.A.C., including the character and volume of pollutants contributed to the WWTF by the industrial user.	60-Days
2.	Submit a draft sewer use ordinance which includes provisions to apply and enforce the Categorical Pretreatment Standards and meets the requirements outlined in Rule 62-625.500(2)(a), F.A.C	90-Days
3.	Submit program implementation procedures that include industrial user survey updating, handling of self-monitoring reports, a monitoring program description, and in particular those requirements referenced in Rule 62-625.500(2)(a)3. and 4., F.A.C., Rule 62-625.500(2)(b)4.-7., F.A.C., and Rule 62-625.600(7)-(9) and (11)-(13), F.A.C. Include information on resources for implementation of a pretreatment program including personnel, equipment, organization, costs, and revenue sources, as required by Rule 62-625.500(3), F.A.C. Include a compliance and enforcement response plan in accordance with Rules 62-625.500(2)(b) and (d), F.A.C.	150-Days
4.	Submit technical information on the wastewater treatment system including service areas, toxic pollutant analyses, pass through, interference, biosolids disposal, sampling program, and other related information. Include a list of local discharge limitations to be applied to industrial wastewaters discharged to the wastewater treatment facility, including supporting documentation, in accordance with Rules 62-625.400(3) and (4), F.A.C. A plan of study shall be submitted to the Department prior to initiating the sampling required to develop local limits, in accordance with Rule 62-625.500(2)(c), F.A.C.	180-Days
5.	Submit a final sewer use ordinance which includes local discharge limitations. Include an Attorney/Solicitor statement meeting the requirements of Rule 62-625.500(4)(a)1, F.A.C., and a Supervisory/Funding endorsement in accordance with Rule 62-625.500(4)(a)2, F.A.C.	270-Days
6.	Submit a request for pretreatment program approval, including a complete copy of all pretreatment program documents for review by the general public, to the Department as required by Rules 62-625.500(4) and 62-625.510, F.A.C.	330-Days

   [62-625.400, .500, .510, and .600]

2. Upon approval of the pretreatment program by the Department, the permittee shall function as the Control Authority and fully implement the approved program. *[62-625.200(4)]*

Exhibit 1-2, Example Florida Permit Language for Implementation of a Local Pretreatment Program

Implementation Requirements

1. The permittee shall function as the Control Authority and shall be responsible for the performance of all pretreatment program requirements contained in Chapter 62-625, F.A.C. The permittee shall be subject to enforcement actions, penalties, and other remedies by the Department or other appropriate parties. The permittee shall implement and enforce its Approved Pretreatment Program. The permittee's Approved Pretreatment Program is hereby made an enforceable condition of this permit. The Department may initiate enforcement action against an industrial user for noncompliance with applicable standards and requirements. *[62-625.500]*

2. The permittee shall enforce the requirements promulgated under Sections 307(b), 307(c), 307(d), and 402(b) of the Act. The permittee shall cause industrial users subject to Federal Categorical Standards to achieve compliance no later than the date specified in those requirements or, in the case of new industrial users, upon commencement of the discharge. *[62-625.410]*

3. The permittee shall perform the pretreatment functions as required in Chapter 62-625, F.A.C., including, but not limited to, the following:

a. Implementing the necessary legal authorities as provided in Rule 62-625.500(2)(a), F.A.C. This includes, among other things, the authority to require compliance with applicable pretreatment standards, which includes general prohibitions listed in Rule 62-625.400(1), F.A.C., specific prohibitions in Rule 62-625.400(2), F.A.C., locally developed limits as required by Rules 62-625.400(3) and (4), F.A.C., and national categorical limits in accordance with Rule 62-625.410, F.A.C.;

b. Implementing the programmatic functions as required under Rule 62-625.500(2)(b), F.A.C.;

c. Providing the required funding, equipment, and personnel to implement the pretreatment program as provided in Rules 62-625.500(2), (3), and (4)., F.A.C.; and

d. Providing a written technical evaluation that local limits have been developed in accordance with Rule 62-625.400(3)(a), F.A.C. The evaluation shall verify whether existing local limits protect the wastewater facilities, and if not, the permittee shall develop new local limits as part of the evaluation in accordance with Rule 62-625.600(16), F.A.C. For new local limits, a plan of study shall be submitted to the Department prior to initiating sampling required to develop the new local limits. This evaluation shall be submitted to the Department at the address in the condition below within 180 days after permit renewal.

[62-625.400 and .500]

4. As required by Rules 62-625.600(8) and (12), F.A.C., the permittee shall submit a signed copy of the annual report for pretreatment activities, including DMRs for Monitoring Site Numbers PRT-I, PRT-E, and PRT-R for this facility _____ *(If the facility serves as the Control Authority for one or more other facilities, enter "and for all facilities covered by the permittee's pretreatment program".)*, to the Department at the following address:

Florida Department of Environmental Protection
Domestic Wastewater Section, Mail Station 3540
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

The annual report shall contain the information required in accordance with Rule 62-625.600(8), F.A.C., except section (8)(f) as noted below, and shall describe the permittee's pretreatment activities _____ (*If the facility serves as the Control Authority for one or more other facilities, enter* ", including those of all covered facilities,".)for the reporting year. In the event that the permittee is not in compliance with any conditions or requirements of the pretreatment program, then the permittee shall also include the reasons for noncompliance and state how and when the permittee shall comply with such conditions and requirements.

In order to comply with Rule 62-625.600(8)(f), F.A.C., the permittee shall submit annual DMRs with the analytical results of influent, effluent, and residuals for those pollutants listed on the DMRs. For any other nonpriority pollutants

which the permittee believes may be causing or contributing to interference, pass through, or adversely impacting residuals quality, the annual report shall provide a summary of all analytical results of influent, effluent, and residuals. The annual report and DMRs are due on _____ *(Enter the appropriate month and day.)* of each year. *[62-625.600(8) and (12)]*

5. In addition to the _____, *(Enter the facility name and ID number.)* the following facilities _____ *(Enter "are" for facilities with approved pretreatment programs. Enter "will be" for facilities required to develop a new pretreatment program.)* covered by the _____ *(Enter the facility name.)* pretreatment program:

   _____

   _____

   _____ *(Enter the name(s) of the facilities covered by this facility's pretreatment program.) (Standard permit condition VII.7. is only applicable when the facility serves as the Control Authority for one or more other facilities.)*

6. No additional facilities _____ *(Enter "are" for facilities with approved pretreatment programs. Enter "will be" for facilities required to develop a new pretreatment program.)* covered by the _____ *(Enter the facility name and ID number.)* pretreatment program. *(Standard permit condition VII.8. is only applicable when the facility serves as the Control Authority and no other facilities are or will be covered by the Control Authority's pretreatment program.)*

7. *Samples* for Monitoring Site Numbers PRT-I, PRT-E, and PRT-R shall be taken at the monitoring site locations described below

Monitoring Location Site Number	Description of Monitoring Location
PRT-I	*(Insert a description of the Influent Monitoring Location Site Number PRT-I)*
PRT-E	*(Insert a description of the Effluent Monitoring Location Site Number PRT-E)*
PRT-R	*(Insert a description of the Residuals Monitoring Location Site Number PRT-R)*