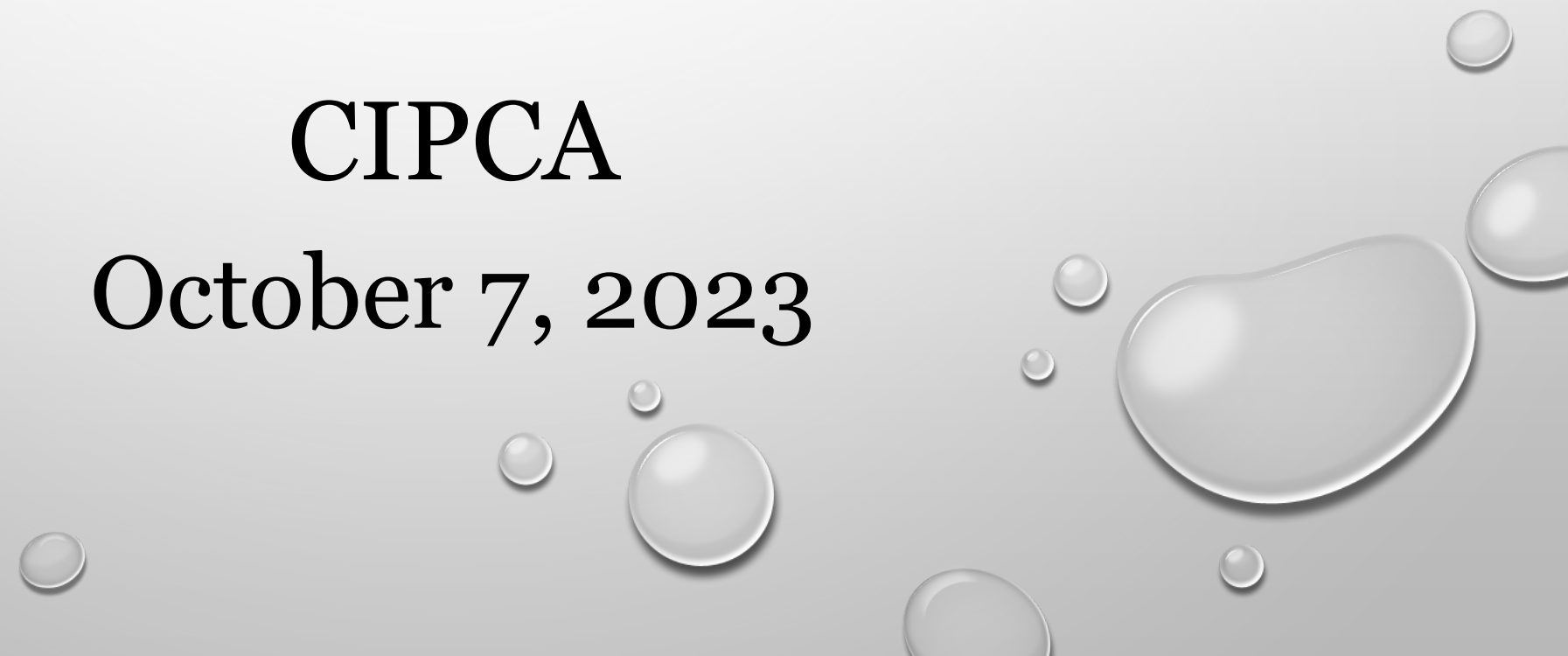




EPA Update

CIPCA

October 7, 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 – 4th draft version (July 2023).
- 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

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

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

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
- Establishing conventional pollutant standards
- Size thresholds for the MPP subparts
- Final Agency Review-September 2023.
- Proposed Rule should be published this Fall.

Dental Amalgam Rule

- 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 Rule

- 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.
- **Ensure the Dental offices are identified, and the Dental Compliance reports are complete and in compliance.**

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
- Sprint Reviews of Annual Report Wireframe on NET
- Beta testing – November-December
- CY24 – NET implementation

Annual Reports Preparation

- NET for CY23 Annual Reports
- Delegation of Authority for NET submittal
 - Designate preparers of the annual report
- 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

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

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

-The Credible Hulk

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