



# Pretreatment Compliance Program

## *Local Limits Discussion*

(Cost of Service Study Announcement)

EHS Roundup Mini Conference - February 6, 2007





# Regulatory Requirement for Pretreatment

- General Pretreatment Regulations in 40CFR403 establish minimum requirements for an approved pretreatment program
  - Operate pursuant to legal authority enforceable in Federal, State or local courts
  - Develop and implement procedures to ensure compliance
  - Develop and adopt local limits to address Federal standards as well as State and local regulations.



# Pretreatment Objectives

- Prevent the introduction of pollutants into Publicly Owned Treatment Works that cause interference or pass through
- Improve opportunities to reclaim and recycle municipal and industrial wastewaters and sludges
- Reduce the health and environmental risk of pollution caused by the discharge of toxic pollutants to POTWs



# Protect Local Treatment Works

- Local limits, if developed properly, should be site specific enough to protect the type, size, and kind of treatment technology and processes used at a POTW



# Protect Local Receiving Environment

- Local limits should also be developed so that the local receiving environment is protected, which in Austin means
  - Colorado River and its tributaries
  - Land where treated sludge is applied
  - Dillo Dirt sold to vendors for distribution



# Typical Local Limits

- Metals (e.g., Ag, As, Cd, Cr, Cu, F, Hg, Mn, Ni, Pb, Zn)
- Cyanide
- Total Toxic Organics (Appendix D, 40CFR122)
- Conventional pollutants (BOD, TSS, etc.)
- Acceptable pH Range
- Fats, Oils, & Greases, Total Petroleum Hydrocarbons
- Other pollutants or pollutant characteristics



# Austin Water Utility - Facts & Figures

- Major WWTPs                      Design Flows
  - Walnut Creek                      75 MGD
  - South Austin Regional       75 MGD
- Also have 9 other minor WWTPs
- Bio-solids Management Plant
  - Hornsby Bend - Sludge Reuse
    - Treated sludge is land applied and composted & sold as Dillo Dirt



# Current Limits & Controlling Standards

<b>Pollutant</b>	<b>Limit (mg/L)</b>	<b>Controlling Standards</b>
■ Arsenic	0.2	WAL-Anaerobic Dig.
■ Cadmium	0.4	GOV-Anaerobic Dig.
■ Chromium	2.4	WAL-Anaerobic Dig.
■ Copper	1.1	SAR- Act. Sludge Inhib.
■ Cyanide	1.0	SAR-Anaerobic Dig.
■ Fluoride	65.0	WAL-Stream Standard
■ Lead	0.4	SAR-40CFR503 Table 3
■ Manganese	6.1	SAR-TAC 319 Haz. Met.
■ Mercury	0.002	SAR-Stream Standard
■ Molybdenum	1.1	WAL-40CFR503 Table1
■ Nickel	1.6	Existing Standard
■ Selenium	1.8	SAR-40CFR503 Table1
■ Silver	1.0	SAR-Stream Standard
■ Zinc	2.3	WAL-Anaerobic Dig.
■ Total Toxic Organics	2.0	Existing Standard



# Mass Limits

- May be applied for Local Limits under certain circumstances as authorized in City of Austin's Wastewater Regulations §15-10-61.
- Applied on a case by case basis.
- Guidance used in application of mass limits comes from EPA's criteria used for categorical pretreatment standards.



# Mass Limit Eligibility Conditions

(a greatly simplified overview)

- Permittee must demonstrate/document water conservation efforts and successes.
- Permittee must pretreat for the pollutant for which a mass limit is requested (if granted, mass limit does not diminish the continued requirement to pretreat).
- Mass limit must account for potential production level decreases.



# *Copper & Semiconductors*

- Current federal categorical pretreatment standards in 40 CFR 469 do not include copper yet there is a growing contribution of copper from some industrial users (IUs) in this sector.
- Some of these same IUs are seeking mass limits in lieu of concentration limits in order to pursue water conservation projects.
- Both parties need to work together in developing equivalent mass limits that will allow the IU to conserve water and remain in compliance, and ensure that the AWU meets its Pretreatment Objectives.
- Unclear how and if the copper local limit may change.



# Future Challenges

- Govalle WWTP taken out of commission, 10/5/2006. Also changes to SAR WWTP.
- Local Limits to be re-evaluated, possible substantial program modification required.
- Treatability studies for Fluoride & Copper will help develop site-specific local limits
- Pretreatment Streamlining Rule – TCEQ wants us to wait to seek a Pretreatment Program modification until TPDES permit cycle comes due or as ordered through an Audit mandate



# Austin Water Utility – Projected Cost of Service (COS) Study Schedule

- Requests for Proposal – February 2007
- Two Consultants Selected – April 2007
  - Residential Advocate
  - Consultant charged with creating the COS model
- COS Study – 1 Year Project
- COS Study Results Due – May/June 2008
- Propose New Rates for FY2009 Budget pending City Council approval
- New Rates if approved effective November 1, 2008



# Austin Water Utility – 2007 COS Study Stakeholder Involvement Process

- Will most likely use the 1999 COS Study Stakeholder process for this COS Study
- After the consultants are hired, representatives from each Customer Class will be notified and asked to participate in a Public Involvement Committee



Questions?



# Contact Information

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