

Management of Pretreatment Programs

Greer Commission of Public Works, Greer, SC / City of Union, Union, SC

Project Description

The 1977 amendments to the Federal Clean Water Act and the Federal Pretreatment Regulations in 40 CFR Part 403 require Publicly Owned Treatment Works (POTWs) that have significant industrial users to administer a local pretreatment program. This local program must control the discharge of pollutants to the public wastewater treatment system from industries such that the industrial discharges do not cause problems at the wastewater treatment facility. Greer Commission of Public Works currently has two significant industrial dischargers to its Maple Creek Wastewater Treatment Plant (WWTP), as well as two permitted underground remediation system dischargers and a number of dischargers requiring no discharge permit (due to the operations of the industry and nature of the wastewater). The City of Union has ten significant industrial dischargers to its two WWTPs. Rogers & Callcott has provided the Greer Commission of Public Works and the City of Union with the management of their pretreatment programs.

Rogers & Callcott Services and Results

Establish Local Limits for Industrial Dischargers – Review NPDES Permit for POTW and determine maximum pollutant loading to the POTW. Then, based on information obtained from industrial surveys, establish the allocation of pollutants for specific industries.

Review and Update Local Sewer Use Ordinances and Regulations – Sewer use ordinances and regulations establish conditions for industrial users to discharge wastewater to a POTW. Items included in the ordinances and regulations include characteristics of the wastewater, sewer rates, inspection procedures, and reporting procedures.

Update Enforcement Response Plans – Enforcement Response Plans outline the procedures that the POTW employs to implement and regulate industrial discharge permits. These procedures include notifications of violations and enforcement procedures. Periodically, EPA updates minimum requirements for enforcement actions and the POTW's plan must be updated as a result.

Review and Update Elements of Local Pretreatment Program – On a five-year cycle, Rogers & Callcott reviews and updates the elements of both the Greer Commission of Public Works and the City Union's pretreatment program and then submits the revised elements to the South Carolina Department of Health and Environmental Control.

Negotiate Changes to Industrial Discharge Permits – If an industrial discharger changes its process or the nature of its discharge, Rogers & Callcott reviews the changes for consistency with the pretreatment program and industrial discharge permit. This permit may be modified to include revised limitations or a schedule of compliance. In these instances, Rogers & Callcott meets with the industry and the POTW to negotiate changes to the permits.

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