

Massachusetts Water Resources Authority

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Director

**Toxic Reduction
and Control**

What is the Pretreatment Program?

- Required by Federal Clean Water Act
- Implemented through regulations developed by U.S. EPA (**40 CFR Part 403**)
- Specific requirements: NPDES Permits for Deer Island and Clinton Wastewater Treatment Plants

Pretreatment Program Objectives

- Prevent pass through of pollutants into receiving waters
- Improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges
- Prevent interference with operation of treatment plant, including protecting worker health and safety

TRAC Highlights

- 2009 EPA Audit Report from 2007 Audit of Pretreatment Program
- Regulations Changes
- Annual Report to EPA October 31, 2009
- PIMS
- Molybdenum

EPA Audit

- EPA and its contractors on-site
December 2007
- Audit Report released February 2009
- Significant Finding: Regulations
update required
- Other issues:
 - Specific permit changes
 - Record-keeping suggestions
 - Permit design suggestions

EPA Audit

- Regulations:
 - Reviewed and approved by EPA
 - Effective August 7, 2009
- Permit Changes: ~ August 15, 2009
- Record-keeping:
 - Hired permanent Records Coordinator, July 2009
 - Document management changes planned/linked to PIMS

Elements of Program

- Regulations and Local Limits
 - Industrial Survey
 - Inspections
 - Permitting
 - Monitoring
 - Enforcement

2009 Regulations Changes

- EPA Mandated Changes
- MWRA Clarifications
- Incentive and Other Charges

EPA and MWRA Clarifications

- Update to incorporate changes to EPA regulations at 40 CFR Part 403
 - Definitions
 - BMPs
 - Reporting requirements
- Regulatory clarifications
 - Administrative procedures (360 CMR 1.00)
 - Enforcement procedures (360 CMR 2.00)
 - Sewer use requirements (360 CMR 10.000)

Incentive and Other Charges

- Across the board, 4.5% increase in FY10, FY11, FY12
- Last changed FY06
- Recovers about 60% of costs of pretreatment program
- Provides incentives to reduce pollutant loadings, maintain compliance

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Industrial Survey

- 1450 Permitted Users in FY09
 - 219 SIUs
 - 290 non-SIUs with individual permits
 - 300 Photodevelopers/Printers
 - 90 Food Processors
 - 560 Low Flow/Low Pollutant Dischargers
- 6500 Industrial/Commercial facilities
- 5000 Gas/Oil Separators

Elements of Program

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- Industrial Survey
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Inspections

- 755 Total Facility Inspections in FY09
 - 266 inspections at 219 SIUs
 - 382 other inspections
 - 88 audits of Photodevelopers and Printers
 - 29 audits of Food Processors









Elements of Program

- Regulations and Local Limits
- Industrial Survey
- Inspections
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Permitting Activities in FY09

- 221 Industrial Permits Issued
 - 155 Renewals
 - 66 New Permits
- 21 Permits Revisions
- 44 Municipal Permits

Elements of Program

- Regulations and Local Limits
- Industrial Survey
- Inspections
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Monitoring Events in FY09

- 191 SIUs with discharges
 - 371 sample locations
 - 1274 monitoring events
- 92 non-SIUs sampled
 - 110 sample locations
 - 208 monitoring events
- 223 NPDES permit events
- 30 Emergency Response events
- 215 Local Limits events
- 1003 Special Project events















Elements of Program

- Regulations and Local Limits
- Industrial Survey
- Inspections
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- Enforcement

Enforcement Activities in FY09

- 185 Notices of Violation
- 30 Notices of Noncompliance and Orders
- 3 Permits with Compliance Schedules
- 3 Proposed Permit Revocations
- 2 Administrative Settlements
- 15 Penalty Assessment Notices
 - \$190,200 assessed
- \$151,245 penalties collected



PIMS

- Consolidated several stand-alone information systems
- All aspects of program managed through PIMS
- Data was migrated from these systems
- August 18, 2008 Go-Live Date

PIMS Features

- Web-SMR for reporting self-monitoring results
- Document generation
- Relatively simple access to information
- Interfaces with other MWRA systems for analytical data, billing, word-processing

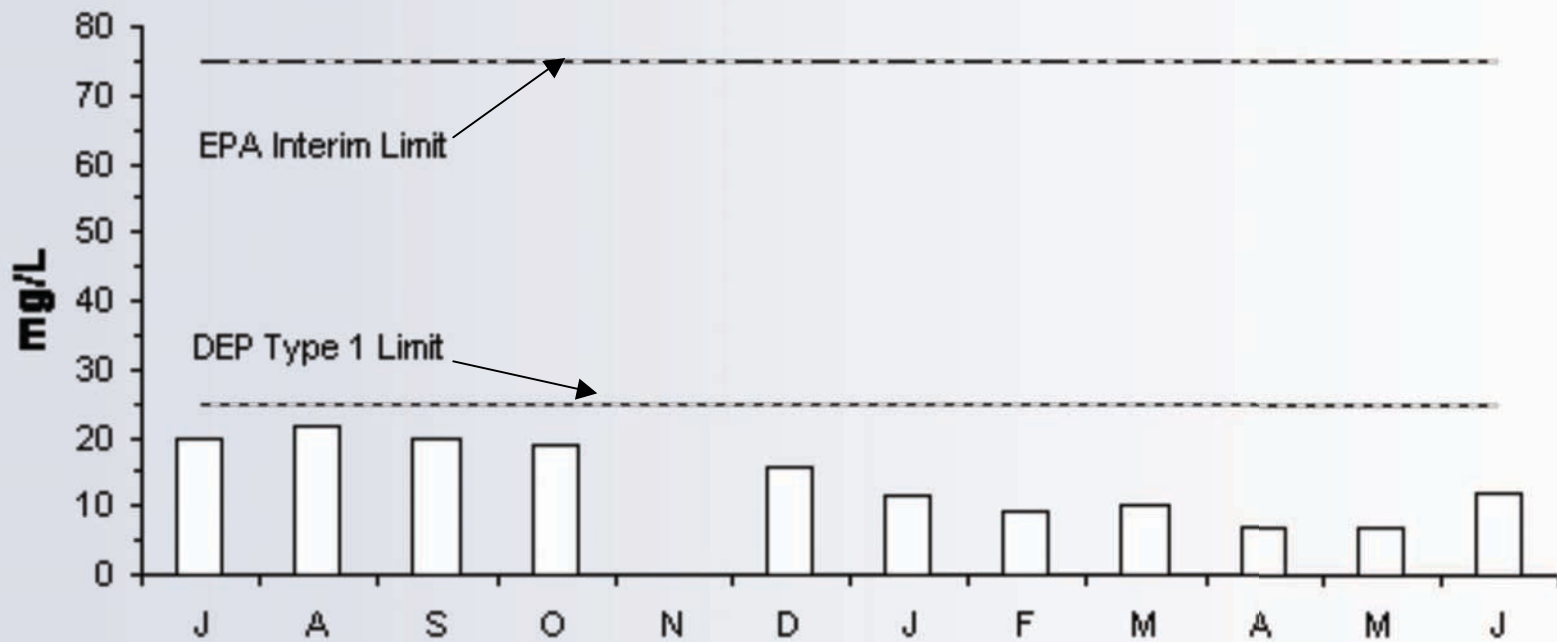
PIMS Future

- Integration with GIS
- Integration with new LIMS (Jan 4, 2010)
- IU filing of data through WebSMR
- On-line permit application
- CROMERR compliance

Molybdenum

- Metal used in corrosion inhibition chemicals in cooling systems
- Pellets always meet EPA interim limit of 75 ppm.
- 4 - 5 months/year, Mo levels in pellets > state limit for unrestricted use (25 ppm).
- FY09: First year that Mo levels fell below state limit for entire year

Molybdenum Concentrations in Biosolids in FY09



Contact Information

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