

## **Frequently Asked Questions**

### **What is Pretreatment?**

Pretreatment applies to treating wastewater containing pollutants prior to discharging the water into the City of Irving's sanitary sewer system by reducing, altering, or eliminating the pollutants. This can be achieved by a physical, chemical, or biological process.

### **What is the Industrial Pretreatment Program?**

The Industrial Pretreatment Program is mandated by section 307 of the Federal Water Pollution Control Act (more commonly referred to as the [Clean Water Act](#)). The Act sets forth the following objectives:

1. To prevent upset, interference and pass-through in the Publicly Owned Treatment Works (POTW).
2. Provide protection with regard to the health and safety of the public and the environment
3. Provide protection of the structure and integrity of the collection system and safety for the personnel working the system
4. To prevent deterioration of the quality standards of the receiving waters
5. To prevent contamination of POTW sludge, which could affect their disposal or future use.

### **Why is a Pretreatment Program necessary?**

Discharging certain substances into the sewer system can:

1. Interfere with the operation of the POTW by upsetting the biological process and killing the microorganisms needed for proper treatment
2. Jeopardize the health and safety of collection system and POTW personnel
3. Clog sewer lines
4. Be extremely dangerous if dumped in high concentrations
5. Mix with other chemicals to form toxic gasses.

Wastewater treatment plants are not designed to remove heavy metals, cyanide and other toxic chemicals. Much of these chemicals settle out of the wastewater and contaminate the sludge, while the rest are discharged with the treated wastewater into the Trinity River

To control toxic discharges at the source, the EPA requires the implementation of a pretreatment program.

## **Where can I find the federal regulations governing pretreatment program requirements them?**

The General Pretreatment Regulations were originally published in 1978, have been updated several times, and can be found in the Code of Federal Regulations in [40 CFR Part 403](#).

## **What is an industrial user?**

An industrial user is any non-residential user that discharges non-domestic wastewater to the City of Irving's sanitary sewer system.

## **Is every business in Irving permitted by the Pretreatment Program?**

- Not every business, only Significant Industrial Users (SIUs) are permitted under the City of Irving's Pretreatment Program. The EPA defines the term Significant Industrial User as:
  1. All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N;
  2. Any other industrial user that discharges an average of 25,000 gallons per day or more of process wastewater; contributes a process waste stream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the treatment plant; or
  3. Is designated as a SIU by the City on the basis that the industrial user has a reasonable potential for adversely affecting the operation of the City's wastewater treatment plant.

## **Which business are permitted by the City?**

<b>Industry</b>	<b>Catagorical</b>
America's Beverage	<b>No</b>
BAE Systems	<b>Yes</b>
Carrington Labs	<b>Yes</b>
Chemolee Labs	<b>Yes</b>
Cosmetic Labs	<b>No</b>
Dr. Pepper	<b>No</b>
Frito Lay	<b>No</b>
Irving Metal Finishers	<b>Yes</b>
Kerry, Inc	<b>No</b>
Littelfuse,LP	<b>Yes</b>
Lone Star Containers	<b>No</b>
McCormick	<b>No</b>
Mohawk	<b>Yes</b>

Multilayer Technology	<b>Yes</b>
Network Circuits Inc.	<b>Yes</b>
Owen-Corning	<b>No</b>
P.C. Specialties	<b>Yes</b>
Quantum Clean	<b>No</b>
Rush Truck Center	<b>No</b>
Trinity Valley Foods	<b>No</b>
US Plating	<b>Yes</b>
USA Packaging	<b>No</b>
W-Tek	<b>Yes</b>

### **What types of users are regulated under the pretreatment program?**

All non-domestic users that discharge to the City of Irving’s sanitary sewer system must comply with the City’s [sewer use ordinance](#). [\(Insert link to sewer use ordinance\)](#) Users shall provide pretreatment of their wastewater as necessary, prior to discharge, to comply with the ordinance.

### **Does the Pretreatment Program Apply to My company?**

If you are an SIU, a Categorical User as listed in 40 CFR part 403 , discharge high strength wastewater, or if your discharge has the potential to impact the receiving wastewater treatment facility of the health or safety of the public, then the program will apply to you.

### **If I am required to be regulated, what do I have to do?**

If an industry is evaluated as a SIU, they then must apply for a permit to discharge wastewater in to the City of Irving’s sewer system. The [Wastewater discharge Permit Application](#) [\(Link to permit application\)](#) must be filled out and returned to the Environmental Compliance Section at 333 Valley View Lane, Irving, TX 75061. Instructions on filling out the permit application may be found [here](#). [\(Link to instructions\)](#)

Inspections and baseline monitoring are then performed, and the application is evaluated. Once the application is approved, a permit is issued for a period not to exceed three years. This permit will state the monitoring, reporting and compliance requirements that the SIU would be required to observe.

### **What are the Federally Listed Categorical Users?**

The listing of Pretreatment Categories and Corresponding CFR reference is found below

<b><u>Pretreatment Category</u></b>	<b><u>CFR Reference</u></b>
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Aluminum Forming	40 CFR 467
Asbestos Manufacturing	40 CFR 427
Battery Manufacturing	40 CFR 461
Builders' Paper and Board Mills	40 CFR 431
Carbon Black Manufacturing	40 CFR 458
Cement Manufacturing	40 CFR 411
Coil Coating	40 CFR 465
Copper Forming	40 CFR 468
Dairy Products Processing	40 CFR 405
Electrical and Electronic Components	40 CFR 469
Electroplating	40 CFR 413
Feedlots	40 CFR 412
Ferroalloy Manufacturing	40 CFR 424
Fertilizer Manufacturing	40 CFR 418
Fruits and Vegetables Processing and Manufacturing	40 CFR 407
Glass Manufacturing	40 CFR 426
Grain Mills Manufacturing	40 CFR 406
Ink Formulating	40 CFR 447
Inorganic Chemicals Manufacturing	40 CFR 415
Iron and Steel Manufacturing	40 CFR 420
Leather Tanning and Finishing	40 CFR 425
Meat Processing	40 CFR 432
Metal Finishing	40 CFR 433
Metal Molding and Casting	40 CFR 464
Nonferrous Metals Forming and Metal Powders	40 CFR 471
Nonferrous Metals Manufacturing	40 CFR 421
Oil and Gas Extraction	40 CFR 435
Paint Formulation	40 CFR 446
Paving and Roofing (Tars and Asphalt)	40 CFR 443
Pesticide Chemicals	40 CFR 455
Petroleum Refining	40 CFR 415
Pharmaceutical Manufacturing	40 CFR 439
Phosphate Manufacturing	40 CFR 422
Plastics Molding and Forming	40 CFR 463
Porcelain Enameling	40 CFR 466
Pulp, Paper and Paperboard	40 CFR 430
Rubber Processing	40 CFR 428
Seafood Processing	40 CFR 408
Soaps and Detergents Manufacturing	40 CFR 417
Steam Electric Power Generating	40 CFR 423
Sugar Processing	40 CFR 409
Timber Products Manufacturing	40 CFR 429
Textile Mills	40 CFR 410

## **What happens if an industry does not comply with the Pretreatment Program?**

The Pretreatment Program makes every effort to maintain working partnerships with the City's regulated industries, valuing information and compliance over enforcement as the best way to achieve mutually beneficial economic and environmental goals. However, if an industry remains non-compliant, that industry will be subject to enforcement action. Irving utilizes a progressive enforcement response plan, with actions ranging from Notices of Violation (NOV) and citations to sewer or water service termination.

## **I didn't have to do this in my last facility, why is Irving different?**

Pretreatment is not only driven by Federal regulation but by State and Local regulations as well.

## **Where does the wastewater go?**

All of the wastewater from the City of Irving is received at the Trinity River Authority Central Regional Wastewater System. The water is then treated and discharged into the Trinity River.

## **What are the Local Limits?**

The following list is the Maximum Allowable discharge form **any** wastewater system user. Note: Some Categorical users have more strict limits

<b><u>Parameter</u></b>	<b><u>Maximum Allowable (mg/L)</u></b>
Arsenic	0.2
Cadmium	0.1
Chromium (total)	2.9
Copper	2.3
Cyanide (total)	0.5
Lead	0.9
Mercury	0.0004
Molybdenum	0.2
Nickel	4.6
Selenium	0.1
Silver	0.8
Zinc	8.0
Oil & Grease	200
TTO (Total Toxic Organics)	2.13
pH (standard pH units)	5.5 min-11.0 max

* BOD <sub>5</sub>	250
* TSS	250

\* For Surcharge Only

### **What is the surcharge program?**

A Surcharge program is a procedure for recovering costs incurred while treating high strength waste (high BOD or TSS) discharged by industrial and commercial users into the wastewater system. It is an additional charge made to an industry which discharges industrial waste into the wastewater system that is treatable by the wastewater system but that exceeds the strength of normal wastewater. BOD and TSS are the

### **What wastes are prohibited in the wastewater system?**

1. Flammable, reactive, corrosive, or radioactive substances
2. Medical or infectious wastes
3. Noxious materials
4. Toxic substances
5. Solid or viscous materials which could cause problems with flow or operation at the treatment plant
6. Non-biodegradable oils
7. Substances which result in the emission of hazardous gases