

# 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.

## **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 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. To help protect the health and safety of the public and the environment.
3. To help protect the structure and integrity of the collection system and the safety of the personnel working on the system.
4. To help prevent deterioration of the quality of the receiving waters.
5. To help prevent contamination of POTW sludge, which could affect its disposal or future use.

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

To control toxic discharges at the source, the EPA requires the implementation of a pretreatment program. 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 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 pass through the treatment plant and are discharged with the treated wastewater into the Trinity River.

## 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

## What are the Local Limits?

The local limits below represent the **maximum discharge** allowed for each listed parameter from **any** user of the City of Irving wastewater system.

Note: Some Categorical users have additional or stricter limits.

| <u>Parameter</u>                                | <u>Collection Method</u> | <u>Maximum Allowable (mg/L)</u> |
|---|--------------------------|---------------------------------|
| Arsenic   | Composite                | 0.2                             |
| Cadmium   | Composite                | 0.1                             |
| Chromium (total)                                | Composite                | 2.9                             |
| Copper  | Composite                | 2.3                             |
| Cyanide (total)                                 | Grab                     | 0.5                             |
| Lead  | Composite                | 0.9                             |
| Mercury   | Composite                | 0.0004                          |
| Molybdenum                                      | Composite                | 0.8 **                          |
| Nickel  | Composite                | 4.6                             |
| Selenium  | Composite                | 0.1                             |
| Silver  | Composite                | 0.8                             |
| Zinc  | Composite                | 8.0                             |
| Oil & Grease                                    | Grab                     | 200                             |
| TTO   | Grab                     | 2.13                            |
| pH (standard pH units)                          | Grab                     | 5.5 min - 11.0 max.             |
| * Biochemical Oxygen Demand (BOD <sub>5</sub> ) | Composite                | 250                             |
| *Total Suspended Solids (TSS)                   | Composite                | 250                             |

\*For Surcharge only

\*\* Effective 1-1-14

## **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.

## **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?**

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, or contributes a process waste stream which makes up 5% or more of the average dry weather hydraulic or organic capacity of the treatment plant; or
3. Any industrial user that is designated as an SIU by the City because the industrial user has a reasonable potential for adversely affecting the operation of the City's wastewater treatment plant.

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

The following industries have discharge permits with the City of Irving (effective 8-1-2014):

| <b>Industry</b>        | <b>Status</b> |
|------------------------|---------------|
| America's Beverage     | SIU           |
| Chemolee Labs          | Categorical   |
| Cosmetic Labs, LP      | SIU           |
| Dr Pepper - DFW        | SIU           |
| Frito Lay, Inc.        | SIU           |
| Irving Metal Finishers | Categorical   |
| Lone Star Container    | SIU           |
| McCormick & Co., Inc.  | SIU           |
| Mohawk Labs            | Categorical   |
| Multilayer Technology  | Categorical   |

| <b>Industry</b>      | <b>Status</b> |
|----------------------|---------------|
| Netvia Group         | Categorical   |
| Owens-Corning        | SIU           |
| PC Specialties       | Categorical   |
| Quantum Clean        | SIU           |
| Rush Truck Center    | SIU           |
| Trinity Valley Foods | SIU           |
| US Plating           | Categorical   |
| USA Packaging        | SIU           |
| Xochitl, Inc.        | SIU           |

**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](#). 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, if you 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.

**What are the Federally Listed Pretreatment Categories?**

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

| CATEGORY                           | 40 CFR PART |
|------------------------------------|-------------|
| Aluminum Forming                   | <u>467</u>  |
| Carbon Black Manufacturing (NSO)   | <u>458</u>  |
| Coil Coating                       | <u>465</u>  |
| Electrical & Electronic Components | <u>469</u>  |
| Feedlots (NSO)                     | <u>412</u>  |
| Glass Manufacturing (NSO)          | <u>426</u>  |
| Ink Formulating (NSO)              | <u>447</u>  |
| Iron & Steel                       | <u>420</u>  |
| Metal Finishing                    | <u>433</u>  |
| Nonferrous Metals Forming          | <u>471</u>  |
| Oil & Gas Extraction               | <u>435</u>  |
| Paint Formulating (NSO)            | <u>446</u>  |
| Petroleum Refining                 | <u>419</u>  |
| Pharmaceuticals                    | <u>439</u>  |
| Pulp, Paper & Paperboard           | <u>430</u>  |
| Soap & Detergent Mfg. (NSO)        | <u>417</u>  |
| Timber Products                    | <u>429</u>  |
| Waste Combustors                   | <u>444</u>  |

| CATEGORY                                       | 40 CFR PART |
|--|-------------|
| Battery Manufacturing                          | <u>461</u>  |
| Centralized Waste Treatment                    | <u>437</u>  |
| Copper Forming                                 | <u>468</u>  |
| Electroplating                                 | <u>413</u>  |
| Fertilizer Manufacturing (NSO)                 | <u>418</u>  |
| Grain Mills (NSO)                              | <u>406</u>  |
| Inorganic Chemicals Manufacturing              | <u>415</u>  |
| Leather Tanning & Finishing                    | <u>425</u>  |
| Metal Molding & Casting                        | <u>464</u>  |
| Nonferrous Metal Manufacturing                 | <u>421</u>  |
| Organic Chemicals, Plastics & Synthetic Fibers | <u>414</u>  |
| Paving & Roofing (NSO)                         | <u>443</u>  |
| Pesticide Chemicals Manufacturing              | <u>455</u>  |
| Porcelain Enameling                            | <u>466</u>  |
| Rubber Manufacturing (NSO)                     | <u>428</u>  |
| Steam Electric                                 | <u>423</u>  |
| Transportation Equipment Cleaning              | <u>442</u>  |

NSO = New Source Only

## **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](#) 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](#).

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.

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

The General Pretreatment Regulations, 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 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.