Edition III

Pretreatment Bytes

July 1998

This is Pretreatment Bytes, an electronic update of issues of importance to Pretreatment Coordinators. Bytes is directly emailed from the EPA Headquarters' Pretreatment staff to the Regional EPA and State Pretreatment Coordinators. Until this publication becomes available via a subscribeable "listserver", please bear with us and feel free to send it to POTWs, friends, and family. For additional detail on any issue, contact your State or Regional EPA Pretreatment Coordinator, or the contact named after each item. E-mail addresses for EPA employees are generally formatted as "lastname.firstname@epamail.epa.gov." If you have any questions regarding, or notices to include in, Pretreatment Bytes, please contact Jan Pickrel at (202) 260-7904 or email at pickrel.jan@epamail.epa.gov.

Project XL *a la* Pretreatment Style: "Pilot Programs"

In the June 23, 1998, Federal Register (63FR34170), EPA published a request for proposals to POTWs that are interested in implementing alternative local pretreatment programs. This Project XL (EPA's "eXcellence and Leadership" program) solicitation challenges POTWs that have demonstrated strong compliance records and the ability to measure environmental performance to submit one to two page proposals describing alternative ways to implement their programs in order to produce superior environmental performance. These short proposals must include a clear description of the alternative program the POTW plans to implement, the environmental benefits to be gained by the program, the regulatory requirements that would need to be revised to implement the program, how program resources would be modified, and the measurement tools to determine whether or not the new procedures are achieving the desired results. POTWs should submit these proposals by September 21, 1998, to their State Pretreatment Program Coordinator, EPA Regional Pretreatment Program Coordinator, and the Director of EPA's Office of Wastewater Management.

To process multiple pilots efficiently, EPA is developing a model Final Project Agreement (FPA) for these projects. After EPA and the selected POTWs agree on the FPA, EPA will issue a single rule to implement all the pilots. For more information, call Patrick Bradley at (202) 260-6963.

P2 Guidance Manual for PFPR

The Pollution Prevention (P2) Manual for the Pesticide Formulating, Packaging, and Repackaging Industry: Implementing the P2 Alternative is now available via the EPA homepage: "www.epa.gov/OST/guide/p2/p2guide.htm". This manual provides guidance on how to assess P2 opportunities and how to assess compliance at PFPR facilities, with chapters devoted to Case Studies (Chapter 8), Workshop Questions and Answers (Chapter 10), and Sample Forms (Appendix B). The hardcopy of the manual is currently being printed and will be automatically sent to all participants of the five workshops held in during the summer of 1997. For additional hard copies, call the Office of Water Resource Center at (202) 260-7786 and request document #EPA-821-B-98-017.

New Asst. Administrator for the Office of Water

On July 17, 1998, J. Charles Fox was nominated to be the Assistant Administrator (AA) for Water at the U.S. Environmental Protection Agency (EPA), and the Robert Perciasepe was appointed as the Assistant Administrator for Air and Radiation. Prior to completion of the confirmation process, Chuck Fox will serve as Acting AA for Water. Chuck Fox most recently has been the Associate Administrator for the Office of Reinvention, and has also served as the Assistant Secretary of the Maryland DEP, and is a former senior member of the Office of Water team.

On July 27, 1998, Deputy Administrator Fred Hansen announced that he will be leaving the Agency to start a new job on October 1. Mr. Hansen accepted a position as general manager of the Portland, Oregon Tri-Met transit agency, with responsibility for rail, light rail, bus, and other transportation systems for the greater Portland area. EPA Administrator Carol Browner has not yet announced who will be acting Deputy Administrator.

EPA's press release on the new appointments can be viewed on the Internet at http://www.epa.gov/new.html.

Effluent Guidelines Update

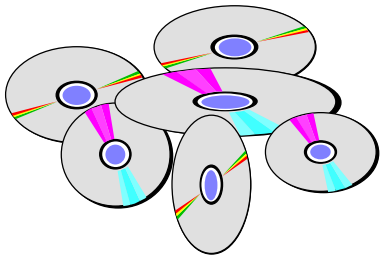
TEC Proposal: 40 CFR 442

In the June 25, 1998 Federal Register (63FR34685), Transportation Equipment Cleaning (TEC) Effluent Guidelines and Limitations were proposed for wastewaters generated from the cleaning of the interiors and exteriors of tank trucks, hopper trucks, rail tank cars, tank containers, barges, hopper barges, ocean/sea tankers, and similar tanks (excluding drums and intermediate bulk containers) that transport materials or cargos that come into direct contact with the tank or container interior. Regulated flows include wash-waters which come into direct contact with the tank or container interior (including pre-rinse cleaning solutions, chemical cleaning solutions, and final rinse solutions), and wastewater generated from washing vehicle exteriors, equipment and floor washings, and other contaminated wastewater at TEC facilities.

EPA is proposing eleven subcategories. Only Subcategories A, B, and C contain Pretreatment standards: Truck/ Chemical; Rail/Chemical, and Barge/ Chemical, respectively.

A public hearing is scheduled for August 18, 1998, from 9-11 a.m. in the EPA Auditorium (Waterside Mall, 401 M Street, SW, Washington, DC).

The Federal Register notice and Fact Sheet are available via EPA's Office of Science and Technology homepage: http://www.epa.gov/OST/NEW. Contact: John Tinger, at (202) 260-4992.



Semiconductor Industry Guidance

The Permits and Engineering & Analysis Divisions within EPA's Office of Water issued a memorandum dated April 21, 1998, clarifying the scope of 40 CFR Part 469, Electrical & Electronic Components Point Source Category, and 40 CFR Part 433, Metal Finishing Point Source Category, as those regulations apply to semiconductor manufacturing. Currently, semiconductor manufacturing facilities are regulated by Subpart A of Part 469, but may also have certain unit operations regulated by Part 433. Concerns were raised about the applicability of the guidelines due to the pace of advancements and the introduction of new technologies in the industry. This guidance provides an overview of the semiconductor manufacturing process, discusses the overlap between Parts 469 and 433, and examines new and emerging manufacturing technologies and how these processes fit into the regulatory framework of Parts 469 and 433.

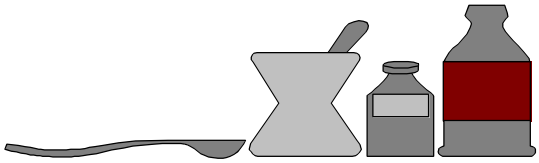
For more information, contact Steve Geil at (202) 260-9817, or Jan Pickrel at (202) 260-7904.

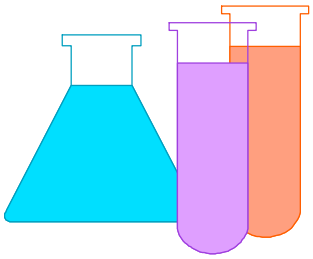
Organic Pesticide Chemicals Manufacturing: Amendments to 40 CFR 455

EPA promulgated a direct and final rule amending 40 CFR 455, published in the Federal Register on July 22, 1998 (63FR39439). These amendments affect only new and existing facilities that manufacture the PAI pendimethalin, based on additional effluent monitoring data submitted to the Agency by the sole existing pendimethalin manufacturer, the American Cyanamid Company. The rule is effective without further notice on October 20, 1998, unless EPA receives relevant adverse comment by September 21, 1998. Contact: Shari Zuskin at (202) 260-7130.

Pharmaceutical Manufacturing

Final regulations for 40 CFR 439 are anticipated to be published in the Federal Register in August. The regulation establishes wastewater limits for direct and indirect discharges for 4 manufacturing subcategories. EPA plans to promulgate final Maxi-mum Available Control Tech-nology (MACT) air standards for the industry on the same day, including provisions regulating emissions from off-site treatment facilities (e.g. POTWs). Contact Frank Hund at (202) 260-7182.





Analytical Methods

Mercury: In the May 26, 1998, Federal Register (63FR28867), EPA proposed amendments to 40 CFR Part 136 to include analytical procedures for reliably measuring Mercury at low levels associated with ambient water quality criteria: Method 1631 - Mercury in Water by Oxidation, Purge and Trap, and Cold Vapor Atomic Fluorescence.

Cyanide: In the July 28, 1998 Federal Register (63FR36810), EPA proposed Method OIA-1677 to determine available Cyanide by Flow Injection, Ligand Exchange, and Amperometry. Method OIA-1677 is being proposed as an additional test procedure for measuring the same cyanide species as are measured by currently approved methods for cyanide amenable to chlorination (CATC). In contrast to currently approved methods, Method OIA-1677 demonstrates greater specificity for cyanide for matrices in which interferences have been encountered, measures cyanide at lower concentrations, offers improved precision and accuracy over currently approved CATC methods, is more rapid, offers improved laboratory safety, and significantly reduces the generation of hazardous waste by the laboratory.

Fact Sheets and outlines of these methods are available via EPA's Homepage at: www.epa.gov/OST.

Risk Management Program

Some POTWs will have to implement a risk management program and file a risk management plan (RMP) with EPA by June 21, 1999, under 40 CFR Part 68, the Risk Management Program rule (based on section 112(r) of the Clean Air Act). The rule is designed to prevent serious chemical accidents that could affect public health and the environment and to improve the response to any accidents that do occur. POTWs that handle, produce, or store any of the following chemicals above the threshold quantities are likely to be subject to this rule:

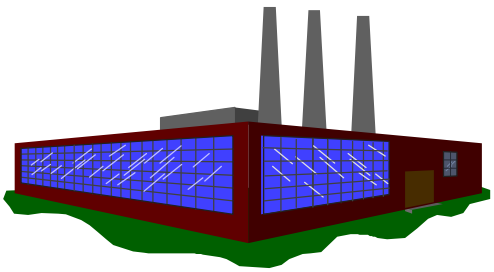
Chlorine	2500 lbs.
Anhydrous ammonia	10,000 lbs.
Anhydrous sulfur dioxide	5000 lbs.
Aqueous ammonia (conc. $\geq$20%)	20,000 lbs.
Methane	10,000 lbs.
Propane	10,000 lbs.

The rule requires covered facilities to develop and to implement an integrated system to identify hazards and manage risks. If you are subject to this rule, you must analyze worst-case releases, document a 5-year history of serious accidents, coordinate with local emergency responders, and file a RMP with EPA. If those releases could affect the public, you must implement a prevention plan. The good news is that if you are subject to the OSHA Process Safety Management Standard under state law, you are probably already in compliance with RMP requirements. "Plan in Hand" workshops are planned, but not yet scheduled.

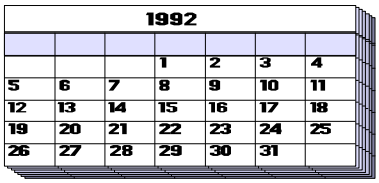
Copies of the rule and technical assistance materials, including a complete list of the other regulated substances under this rule and their thresholds, are available at EPA's Chemical Emergency Preparedness and Prevention Office homepage: http://www.epa.gov/swercepp/ or by calling EPA's hotline at (800) 424-9346.

Sharing the Load: Effluent Trading

The EPA Industry Strategies Division, the New Jersey Department of Environmental Protection, US EPA Region 2, and a stakeholder group of industry, environmental group, union, and community representatives, are working together to assess current environmental protection strategies in NJ's batch chemical manufacturing industry in order to develop better approaches. A subset of that group documented the lessons learned from trading pretreatment limits and are providing that plus information on the structure and background of the trade in the publication, Sharing the Load: Effluent Trading For Indirect Dischargers (EPA 231-R-98-003, May 1998), available soon via EPA's Watershed/Trading homepage: www.epa.gov/OWOW/watershed. More information on the NJ Chemical Industry Project can be found at the EPA Office of Policy homepage: www.epa.gov/oppe/isd/nj.htm or by contacting Catherine Tunis at (202) 260-2698.



Calendar



August 3-7, 1998: EPA Water Quality Standards Academy Basic Course, Washington, DC. Contact Crystall Smith of The Cadmus Group, Inc.: (703) 998-6862, ext. 170.

August 24-27, 1998: "Strengthening the Foundation of the Nation's Water Quality Program" and EPA Meeting on Water Quality Standards, Water Quality Criteria, and Implementation, Including Water Quality Based Permitting, Philadelphia, PA. Contact Crystall Smith of The Cadmus Group, Inc.: (703) 998-6862, ext. 2190.

August 24-25, 1998: EPA/WEF Pretreatment Training Course for 1998, Sacramento, CA. Contact Pat Bradley at (202) 260-6963.

August 27-28, 1998: EPA/WEF Pretreatment Training Course for 1998, San Diego, CA.

September 16-17, 1998: VOC Recovery Seminar, Cincinnati, OH (from the EPA Office of Research and Development, US Department of Energy, AICHE, and the Center for Waste Reduction Technologies). Contact Scott Hedges at hedges.scott@epamail.epa.gov.

September 21-25, 1998: NPDES Permit Writers Training, Seattle, WA. Contact Dan Weese at (202) 260-6809.

October 28-30, 1998: 1998 EPA/AMSA National Pretreatment Coordinators Meeting, Kansas City, MO.

EPA Hotlines

Chemical Emergency Preparedness and Prevention Office hotline (800) 424-9346

EPA Waste Wi$e/Waste Reduction (800) 372-9473

Emergency Planning & Community Right to Know, Title III (800) 535-0202

Office of Pollution Prevention Toxics Small Business Liaison (202) 260-2983

Pollution Prevention Information Clearinghouse (202) 260-1023

Waste Water/Small Flows Clearinghouse (800) 624-8301

Water Resource Center (202) 260-7786

Regional Sound Bytes: What's New in Pretreatment in EPA's Regions?

❸ As of June 22, 1998, Region 3's office has moved. The new address is: U.S. EPA Region 3, 1650 Arch Street, Philadelphia, PA, 19103-2029. Telephone numbers also changed: Pat Chew - 215-814-5793; Steve Copeland - 215-814-5792; Bob Hansford - 215-814-5791; John Lovell - 215-814-5790; Carol Manuel - 215-814-5794; Martin Matlin - 215-814-5789; Fax - 215-814-2318. The Pretreatment Team's mailcode (3WP24), e-mail addresses, and the Region 3 pretreatment website address remain unchanged with the move. The Region 3 pretreatment webpage address is: www.epa.gov/reg3wapd/3wp24/preweb.

❼&❽ EPA Regions VII and VIII held a joint Pretreatment Workshop in Colorado Springs on April 15-17. The approximately 185 attendees included POTWs, states, EPA regional and HQ Pretreatment staff, and several invited speakers. The meeting had platform presentations throughout the 2½ day Conference. Topics included BMPs and their use for correctional facilities, mobile power washers, and radiator shops. Other topics included Inspection procedures for IUs, Local Limits and Water Quality Standards, new methods update, Mercury/Silver/Chromium controls, Clean Sampling, funding pretreatment programs, WET and TIEs, and Oil and grease local limit development. Breakout discussion sessions included Pretreatment 101, Hauled Waste, Enforcement, and QA/QC Sampling Analysis and Data Evaluation. For further information, contact Curt McCormick at 303-312-6377 or, preferably at mccormick.curt@epamail.epa.gov.

HQ welcomes a new member to the HQ Pretreatment Team: Brian Frazer. Brian began his wastewater career at the Hopewell (VA) waste water treatment plant. For the last nine years he was employed with Fairfax County, Virginia where he was the Supervisor of the Industrial Waste Section at the Lower Potomac Pollution Control Plant (Noman M. Cole, Jr. Pollution Control Plant), a 56 MGD wastewater treatment facility. As Supervisor of the Industrial Waste Section, he was involved in the Pretreatment program, storm water monitoring and permitting, groundwater remediation projects, toxicity monitoring, and environmental investigations. Brian is also a member of the USAF Hazardous Materials Transportation Unit.