

## The HWU Pretreatment Program

The Pretreatment Program is a federally mandated National program that requires each State's municipalities (cities) to regulate and enforce approved local permit limits on Industrial Users (IUs) in the Program, thus our city as well as all others must run a Pretreatment Program, listed as active or inactive within the Commonwealth of Kentucky. All sources discharging to the watercourses in the United States must obtain an NPDES (National Pollutant Discharge Elimination System) permit.

The Clean Water Act in 1977 prompted the States to begin programs to monitor the cities in their jurisdiction and to hold them accountable for the wastes their factories and commercial businesses produced to manufacture their products. Currently, the HWU has twenty-four (24) permits to regulate and track, including the local septage haulers. Some are large entities and some are small family businesses.

Pretreatment is the term used to describe what industries may have to do to their waste stream prior to discharge to the City's collection system and POTW (Publicly Owned Treatment Works). A more specific term is 'source control.' It is always easier and smarter to treat a waste at its source than it is after it has traveled down the line or entered the wastewater plant and possibly disrupted treatment.

There are criteria for an IU to be placed into a local Program. They are any/or of the following:

- ✚ An Industrial User subject to Pretreatment Standards.
- ✚ An IU discharges 25,000 GPD or more of process wastewater, non-contact cooling water, and/or boiler blowdown.
- ✚ An IU which contributes 5% or more of dry weather hydraulic loading or capacity of POTW.
- ✚ Any IU having reasonable potential adversely affecting the POTW or violating any standard or requirements.

Two types of Industrial Users have specific requirements listed in the regulations. They are the Significant Industrial Users (SIU) and the Categorical Industrial Users (CIU) which is listed by 40 CFR 403.6 and Parts 405-471.

The main function of the Pretreatment Program is to protect the POTW by consistently tracking the Industrial Users in the Pretreatment Program. There are two (2) regulations that govern Pretreatment Programs. In the 40 CFR (Code of Federal Regulations), they are Parts 122 and 403.

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The Industries in the Program are inspected and sampled regularly by the HWU Pretreatment Program as required, to ensure that they are making an effort to be consistent. They are also required to submit Self-Monitoring analyses on their waste streams to the HWU Pretreatment Program Coordinator on a scheduled basis each year that is determined in their Discharge Permit. This is also to monitor the consistency of the industry's wastewater discharge and keep 'running data' on the quality of their discharge from their laboratory as well as the HWU's laboratory. For the sake of neutrality, the HWU contracts an outside laboratory to perform the monitorings on the Industrial Users in the Pretreatment Program.

The Pretreatment Program allows the Coordinator to build a rapport with the Industrial Representatives or "contacts" and this makes the job much easier. If it is managed effectively, a strong working relationship is formed over time. The Industry knows that they can trust what the Coordinator tells them and the Coordinator knows that the Industry is making a consistent effort.

To assure fairness and equality when an Industry has a violation, every City has been required by the Commonwealth to create a tabular guide that shows the chain of enforcement (ERP) that must be approved by the State as acceptable steps of enforcement in solving a problem with an industry. The Federal and State government also gives the city the ability to collect monies for certain parameters that the Industry might exceed during a monitoring event. These are called surcharges. This allows cities to re-coup treatment costs for organics that exceed the permit limit of the Industrial User, yet they are treatable at the Wastewater Plant.

The State of Kentucky also requires three (3) reports per year from the Henderson Water Utility (city) that show the status of all the Industries in the Pretreatment Program as well as a thorough annual laboratory scan on the Wastewater Treatment Plants' influent, effluent, and bio-solids that these Industries discharge to. The HWU has many reporting requirements from the State just as the Industries have them to the Henderson Water Utility. Each entity is accountable for the quality of their wastewater stream.

These are just a few facts about our program. There is much more to know about the federal Pretreatment Program. If you want to know more about its role and purpose, you can reach the Pretreatment Coordinator at (270) 826-2824 or on our website at [www.hkywater.org](http://www.hkywater.org)