

PRETREATMENT BULLETIN

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BULLETIN #7

Contents

Winners of Pretreatment Excellence Awards Announced	p. 1
Pretreatment Enforcement Initiative	p. 3
Other Enforcement News	p. 5
Bulletin Board	p. 5
PIRT Deadline	p. 6
Sewage Sludge Sampling and Analysis Guidance	p. 6
Pretreatment Enforcement Response Guidance	p. 6
Pollution Prevention - How Does Pretreatment Fit In?	p. 7
PRELIM Update	p. 9
Pretreatment Report to Congress	p. 9
Index	p. 10

On September 22, 1989, California became the 27th state with an approved state pretreatment program.

U.S. Environmental Protection Agency
Office of Water Enforcement and Permits
EN-336
401 M St. SW
Washington, DC 20460

Winners of Pretreatment Excellence Awards Announced

The Awards Review Committee for the National Pretreatment Excellence Awards has announced its choices of recipients for the 1989 National Pretreatment Excellence Awards. EPA received many fine applications from the 60 Publicly Owned Treatment Works (POTWs) originally nominated by their States and Regions. After a thorough review of each POTW's program, the review committee chose eight POTWs to be honored at an EPA awards ceremony. This ceremony took place on October 16, 1989, in San Francisco at the 1989 Water Pollution Control Federation conference.

Art Saarinen, President of the Water Pollution Control Federation, welcomed the award winners and their guests in his opening remarks to the group. With over 300 spectators in attendance, representatives from each winning POTW received a plaque presented by James Elder, Director of the Office of Water Enforcement and Permits at U.S. EPA. Rebecca Hanmer, Acting Assistant Administrator for the Office of Water at U.S. EPA, described the highlights and innova-

tions of each POTW's program After the ceremony, a reception and photo session with Ms. Hanmer was held for the winners and their guests.

THE WINNERS

The first place award winner for the smallest size category (0-2.00 million gallons per day (mgd)) is the City of Three Rivers, Michigan. This POTW has had particular success in the areas of influent, effluent, and stream quality improvements through implementation of the pretreatment program. One example of this success is the removal of mercury from the system through discovery and removal of a mercury-containing biocide in an industrial user's production process. This removal may eventually lead to elimination of recommi for the public to reduce fish consumption from the local river.

The second place award winner for the smallest size category (0-2.00 mgd) is Contentnea Metropolitan Sewerage District in Grifton, North Carolina As a small POTW with 4 significant industrial users Contentnea has used a system of communication and combined inspection and sampling visits to accomplish their goals of reducing pollutant loadings at the POTW in order to ensure consistent NPDES permit compliance.

The Searcy Board of Public Utilities in Searcy, Arkansas, is the first place award winner in the 2.01-5.00 mgd size category. Through industrial user permits and an emphasis on communication with its industrial users through letters, memos, and inspections, and public relations projects which build support for the pretreatment program through programs and tours for civic clubs and schools, this POTW has reduced the threat of pass through and interference at its plant They have also encouraged the development of markets for industrial by-products, such as a local ice cream producer's whey and milk solids, which are sold to a local pig farmer.

The Northampton Wastewater Treatment Plant in Northampton, Massachusetts, is the recipient of the second place Pretreatment Excellence Award in the 2.01-5.00 mgd size category. Through a straightforward approach to program implementation, which includes an organized enforcement plan and consistent financial support from the town, this POTW protects sludge quality, worker health and safety, and the receiving waters of the Connecticut River.

In the 5.01-20.00 mgd size category, two POTWs tied for first place, so no second place award was presented.

The City of Tyler, Texas, is the first place co-recipient for the 5.01-20.00 mgd size category. This POTW uses a rigorous monitoring program plus a one-on-one approach with industrial users including development of an industrial user sampling guide, to achieve envirommental successes. Through its pretreatment program, the City has experienced a 10-15% decrease in organic and solids loading on each of its plants, as well as a reduction of heavy metals concentration in its influent and sludge ranging up to 85% in some cases.

The second co-recipient of the first place award for the 5.01-20.00 mgd size category is the City of La Crosse, Wisconsin. Along with a computerized system for permitting significant industrial users, this POTW demonstrated innovation in its approach to non-permitted sources such as restaurants and car washes. The POTW sent an informational letter to each restaurant and car wash in the city, and followed up with a visit to answer any staff questions regarding grease and sand traps. These steps helped to reduce the possibility of interference in the system The

improved results of effluent toxicity testing are another of the positive results of this city's pretreatment program.

The East Bay Municipal Utility District in California is the first place recipient in the largest size category (>20.00 mgd). This POTW runs a large pretreatment program and maintains strong communication (i.e., direct mailings regarding regulatory changes and training programs, annual meetings for industrial customers, and tours of the treatment plant) with the regulated community. Since institution of the authority to regulate industrial dischargers in 1972, the POTW has achieved successes such as no treatment plant upsets caused by industrial discharges, 100% compliance with NPDES limits for toxics, and successful sludge composting.

The second place recipient in the largest size category is Louisville and Jefferson County Metropolitan Sewer District in Louisville Kentucky. Through an active public education program and an innovative spill response program supported by a Hazardous Materials Ordinance, this POTW has greatly improved its protection of the city's sewer system against hazardous materials spills over the past 5 years.

ENFORCEMENT NEWS

PRETREATMENT ENFORCEMENT INITIATIVE

On October 4, 1989, EPA Administrator William K. Reilly and Attorney General Richard Thornburgh announced that the U.S. EPA and the U.S. Department of Justice filed suit against the cities of Detroit, MI, El Paso, TX, Phoenix, AZ, and San Antonio, TX, for failure to properly implement and enforce their pretreatment programs. These four cities and 57 others are part of the EPA's Pretreatment Enforcement Initiative meant to draw attention to the poor implementation of pretreatment programs. "For health and safety reasons, as well as to protect the nation's investment in sewage treatment plants - estimated to range between \$40 to \$60 billion over the last 20 years - these programs are essential," Reilly said.

As of October 4, the ongoing enforcement initiative covered a total of 61 cities in 21 States. EPA is joined in the enforcement initiative by several States, including California, Michigan, North Carolina, Ohio, and Tennessee. Each of the 61 cities has been issued administrative penalty orders or has had civil judicial complaints filed against it for pretreatment violations. Municipal treatment facilities in the 61 cities serve over 9 million people and regulate over 1,600 significant industries. In 1989, 29 settlements provided for over \$2.3 million in penalties. In the past few weeks additional enforcement actions addressing pretreatment implementation problems have been taken by EPA and by States against the following cities: Conroe, TX, Easthampton, MA, Massillon, OH and Springdale, AR. Additional enforcement actions are planned for the near future.

Thornburgh stated that the initiative is meant to send a strong signal that "[polluters, public or private, cannot be permitted to ignore the law." Reilly stated at a press conference that this action will help to prevent industries in some areas from gaining competitive advantage due to uneven enforcement of environmental laws. The EPA Administrator said, "We are sending a clear message- that no industry or municipality will be allowed to violate environmental laws without risking sanctions and penalties."

Reactions to the initiative from environmental groups such as the Natural Resources Defense Council (NRDC) were generally favorable. The NRDC welcomed "this strong (and long overdue)

signal that federal government plans to increase enforcement of the pretreatment laws. Pretreatment is a critical component of our national program to control toxic pollutants in our waters and in sewage sludge."

See the following page for a list of cities involved in the Pretreatment Enforcement Initiative as of November 1989.

1989 Enforcement Actions for Failure to Implement Pretreatment Programs

EPA Region 1

* Chicopee, MA
Easthampton, MA
Gloucester, MA
Greater Lawrence, MA
Newburyport, MA

EPA Region 2

Rockaway Valley (Parsippany), NJ
Dunkirk, NY
* Haverstraw Regional Board, NY
Niagara County, NY
Watertown, NY

EPA Region 3

* Bellefonte, PA
Easton, PA
Lackawanna River Basin, PA
Lancaster Area, PA
Latrobe, PA
*Pottstown, PA
Punxsutawney, PA

EPA Region 4

* Escambia County (Pensacola), FL
* Titusville, FL
* Kings Mountain, NC
* Brownsville, TN
* Lawrenceburg, TN
* Lynchburg, TN
* McMinnville, TN
* Springfield, TN

EPA Region 5

Sauget, IL

EPA Region 6

*Siloam Springs, AR
Springdale, AR
Monroe, LA
*Amarillo, TX
Beaumont, TX
Brownsville, TX
Conroe, TX
El Paso, TX
Galveston, TX
*McAllen, TX
Mineral Wells, TX
*Nacogdoches, TX
*San Antonio, TX
*Waxahachie, TX

EPA Region 7

Kansas City, KS
Salina, KS
Topeka, KS
Little Blue Valley (Independence), MO

EPA Region 8

Delta, CO
*Denver (Metro), CO
*Great Falls, MT

EPA Region 9

Phoenix, AZ
*Chino Basin, CA
West Sacramento, CA

EPA Region 10

Clackamas County (Oregon City), OR
Klamath Falls, OR
LA Grande, OR

Evansville, IN
Gary, IN
Speedway, IN
Detroit, MI
*Jackson, MI

Portland, OR

*Ashtabula, OH
*Bellefontaine, OH
*Cambridge, OH
*Girard, OH
*Massillon, OH
*Newark, OH

* settled actions

ENFORCEMENT NEWS CONTINUED

INDUSTRY ENFORCEMENT

POTWs, States, and EPA are continually taking enforcement action against industrial users for failure to comply with pretreatment standards and requirements. A recent enforcement action regarding Borjohn Optical Technology, Inc. is of particular interest. On October 2, 1989, a federal grand jury returned a one hundred thirty-three count indictment, stemming from a joint investigation by the Federal Bureau of Investigation and U.S. EPA. Borjohn Optical Technology, Inc., located in Burlington MA, and its president, John Borowski, were charged with knowingly discharging industrial wastewater with an illegally low pH and illegally high concentrations of nickel in violation of the Clean Water Act. The indictment also charged both parties with knowingly placing employees of Borjohn Optical Technology, Inc. in imminent danger of death or serious bodily injury as a result of the illegal wastewater discharges in violation of the Clean Water Act.

The indictment is the first in New England and the third in the U.S. to use the "knowing endangerment" provision of the Clean Water Act. That provision was added to the Clean Water Act in 1987 and makes it a separate crime to knowingly place another person in imminent danger of death or serious bodily injury.

U.S. Attorney Wayne A. Budd stated, "We have long known that environmental crime harms not only our environment, but our health as well. The knowing endangerment provision of the Clean Water Act now enables us to respond to both of these issues. This office's enforcement of that provision underscores our determination to make use of every available tool in investigating and prosecuting those who violate the environmental laws."

Borowski faces a maximum penalty of 3 years in prison and a \$50,000 fine on each of the 65 counts charging illegal discharge of pollutants and a maximum penalty of 15 years in prison and a \$250,000 fine on each of the 68 counts charging him with "knowing endangerment" 'Me company faces a maximum fine of \$50,000 on each of the 65 illegal discharge violations and a maximum fine of \$1 million on each of the 68 knowing endangerment counts. Arraignment was before a U.S. Magistrate on October 17, 1989.

BULLETIN BOARD

The Bulletin Board is a new section of the Pretreatment Bulletin meant to provide exchange opportunities to POTWs. If you have a request for information from other POTWs please contact Desiree Di Mauro at (202) 475-7017 or write to U.S. EPA, Permits (EN-336), 401 M St. SW, Washington, DC 20460

WARNING

The Office of Water Enforcement and Permits has recently become aware of misleading advertisements for hazardous waste training courses offered to POTWs. Not all of these courses are taught or sponsored by U.S. EPA and statements made in the brochures may be misleading. If you are interested in taking an EPA course, we encourage you to verify the authenticity of these courses with your state or EPA regional office before registering.

INFORMATION REQUEST

Passaic Valley Sewerage Commissioners are attempting to design a portable sampler for floatable oil and grease. If any other POTW has already developed such a device, Passaic Valley would appreciate any information you could provide. Please contact Phil Polios, Industrial Pretreatment Section, CN-029, NJ Dept. of Environmental Protection, Trenton, NJ 08625-0029.

DEADLINE REMINDER

The deadline for one of the pretreatment program changes resulting from the PIRT amendments (53 FR, 40562, Oct. 17, 1988) was November 16, 1989. By that date all approved POTW programs must have a minimum penalty authority of \$ 1,000 per day per violation for each day that an industrial user is in violation of the POTW's pretreatment program (revised section 40 CFR 403.8(f)(1)(vi)(A)). Programs which need a change in state law to implement this change have until November 16, 1990, to comply. For more information, see Federal Register 53, 40562, Oct. 17, 1988, or Pretreatment Bulletin #5.

GUIDANCE UPDATE

SEWAGE SLUDGE SAMPLING AND ANALYSIS GUIDANCE

The POTW Sludge Sampling and Analysis Guidance Document was finalized in August 1989, and is now available. The guidance, which was distributed in draft in June 1988, was developed to assist POTW operators, and permit writers in establishing and implementing a sampling and analysis program, gathering information on sludge quality, and developing and determining compliance with permit conditions. This guidance is based on current, state-of-the-art field and laboratory practices and therefore is recommended for all sludge sampling and analysis programs. To obtain a copy of the final guidance please contact Cristina Morrison at (202) 475-9535 or you may write for a copy at U.S. EPA, Permits Division (EN-336), 401 M St. SW, Washington, DC 20460.

PRETREATMENT ENFORCEMENT RESPONSE GUIDANCE

In November 1988. EPA proposed to promulgate amendments to the General Pretreatment Regulations requiring all POTWs with approved pretreatment programs to develop enforcement response plans describing how the POTW will investigate and respond to instances of noncompliance. In conjunction with this rulemaking and in recognition of POTW enforcement difficulties, EPA has developed the Guidance for Developing Control Authority Enforcement Response Plans. This guidance is intended to provide municipal pretreatment personnel with recommendations for assessing enforcement authorities, determining appropriate enforcement roles for personnel, and deciding upon enforcement remedies for specific violations. To further assist Control Authorities in meeting the proposed changes to the General Pretreatment Regulations, the manual includes a model enforcement response guide and a detailed analysis of each of the common enforcement remedies.

The Agency believes that the process of developing these plans will be very valuable in helping POTWs decide what resources are needed to enforce their pretreatment programs and how they will actually deal with industrial user violations. Such plans will also make it much easier for the approval authority to determine whether a POTW is complying with its pretreatment implementation requirements for enforcement. This manual complements an earlier document prepared by EPA entitled, Pretreatment Compliance Monitoring and Enforcement Guidance (PCME) (September 1986).

The guidance was initially printed in early December and will be distributed to all POTWs with approved pretreatment programs, approved pretreatment states, and Regional pretreatment coordinators. If you would like a copy of this document and you are not in this group of initial recipients, please send a written request to: U.S. EPA, Enforcement Division (EN-338), 401 M St. SW, Washington, DC 20460.

POLLUTION PREVENTION - HOW DOES PRETREATMENT FIT IN?

As protection of the environment continues into the 1990s, environmental protection professionals must move beyond a singular focus on end-of-pipe clean-up methods. EPA's goal is to stop pollution from occurring by promoting programs that recycle waste products and reduce sources of pollution. Pollution prevention in the pretreatment program can be encouraged at the state, local, and federal levels.

At the state level an example of pollution prevention in pretreatment is a program being developed in the State of New Jersey. New Jersey has proposed a statewide industrial hazardous substance source reduction and recycling program. Through legislative and administrative changes, the Department of Environmental Protection (NJDEP) will implement the program both through existing program offices and through a new centralized pollution prevention office in the NJDEP.

The pollution prevention program in New Jersey involves two steps: facility self-identification of pollution prevention opportunities and facility-wide permitting.

In developing the pollution prevention program, the NJDEP sponsored a study of the pretreatment program and the elements of the program which encourage or discourage pollution prevention, primarily hazardous waste reduction. The writers of the study found that the pretreatment program must be viewed as a vigorous program, rather than as a means of disposing of pollutants, if it is to meet the goals of the pollution prevention program. The writers identified

4 elements of the pretreatment program which have the potential to directly encourage pollution prevention among industrial users.

The first of these elements is the use of NJPDES pretreatment permits to industrial users to encourage them to explore methods of pollution prevention that could act as pretreatment techniques.

The second element involves possible changes in pretreatment requirements in exchange for use of pollution prevention techniques. For example, the control authority may choose to remove a monitoring request for a certain pollutant if the industrial user can demonstrate that the pollutant is no longer pre-sent in the waste stream due to pollution prevention technology.

The third element of the program involves education and technical assistance for indirect dischargers. Through education, New Jersey hopes to demonstrate the benefits of pollution prevention to industrial users.

The fourth element that indirectly encourages pollution prevention is the issuance of more stringent local limits and new categorical standards. With newer, stricter standards, indirect dischargers will seek out new, more inventive methods to meet the new requirements.

Just as at the state level, pollution prevention can also be a goal of local pretreatment programs. Pretreatment staff at POTWs can encourage tins practice through a number of techniques:

Through enforcement of stringent standards and local limits, pretreatment personnel can encourage new industries to seek the least polluting technology for their particular industries.

Pretreatment staff can encourage indusuies to prevent pollution by finding alternative markets for production by-products; this action turns pollutants back into production raw materials.

The writer of a pretreatment control mechanism can further help EPA reach its goal of pollution prevention through awareness of cross-media effects of various methods of pollution control.

Pretreatment staff can help with technology transfer by making pollution prevention information available to their industrial users.

The benefits of pollution prevention for a locality are numerous. With a pollution prevendon program in place, a local wastewater treatment plant runs less risk of pass through and interference, simply because the plant does not receive as many hazardous pollutants and has more of a safety zone regarding the amount of pollutants it can handle. Equally important, pollution prevention will result in better receiving stream water quality.

At the federal level, EPA encourages the use of pretreatment control methods which, rather than moving pollution between media prevent pollution from occurring. Training courses are helpful in teaching permit writers to write permits that are sensitive to then crossmedia effects.

EPA's Pollution Prevention Information Clearinghouse (PPIC) is a public outreach project regarding pollution prevention. The PPIC is part of EPA's plan for reaching its goal of pollution prevention by using technology transfer, education, and public awareness. The PPIC consists of four information exchange sources for use by individuals interested in pollution prevention:

- 1) Repository - a reference library containing current information pollution prevention. Sources of information include case studies, educational materials, legislation review, and fact sheets.

- 2) Electronic Information Exchange System (EEES) - a computerized link to information. With this system, which is accessible by any personal computer equipped with a modem, the user

can access data bases or order documents on pollution prevention. Information found in this system includes a directory of pollution prevention experts, case studies, and a calendar of upcoming pollution prevention events.

3) Hotline - a free telephone service to answer questions regarding pollution prevention and a link with EIES for users without access to a modem-equipped personal computer.

4) Outreach efforts - availability of training sessions and packets containing general and industry-specific pollution prevention information.

Individuals involved in the pretreatment program can improve the prevention potential of their programs by using the PPIC. For more information on the PPIC, contact Myles E. Morse, Office of Environmental Engineering and Technology Demonstration at (202) 475-7161 or , Pollution Prevention Office at (202) 245-3557, or by writing to her at the Pollution Prevention Office, U.S. EPA, 401 M St. SW, Washington, DC 20460. To have your name included on the mailing list to receive "Pollution Prevention News" a monthly publication of the Pollution Prevention Office, contact Priscilla Flattery at the above address.

Pretreatment is a prime route by which all levels of government can move closer to EPA's goal of pollution prevention. By using tools such as pretreatment control mechanisms (permits) and the PPIC, great strides can be made at the federal, state, and local levels toward preventing pollution.

PRELIM UPDATE

The headworks analysis computer program (PRELIM version 3) used in local limits development has been upgraded and is now undergoing testing. The new version, PRELIM 4, is expected to be ready for release and distribution to interested parties in the Spring of 1990. Among the improvements included are: changes that update the program to be consistent with the 1987 Local Limits Guidance, closer tracking of the data entry sheets, the decile approach to calculate removal efficiencies, unlimited number of industries that can be entered, and pull-down menus. EPA is now in the process of preparing a list of users interested in receiving the new version of PRELIM. If you want a copy of PRELIM 4, please complete the form on the next page and send it to John Hopkins (EN336), Permits Division, U.S. EPA, 401 M St. SW, Washington, DC 20460.

PRETREATMENT REPORT TO CONGRESS

In response to Section 519 of the Water Quality Act of 1987, EPA has undertaken a comprehensive study of the pretreatment program. A Report to Congress on the results of the study is due in February 1991. Section 519 directs EPA to address several aspects of the pretreatment program in the Report to Congress:

- * Adequacy of data on environmental impacts of toxic discharges from POTWs
- * Toxic pollutant removal efficiency of secondary treatment
- * POTWs' capabilities to revise national standards
- * Study of alternative regulatory strategies, focussing on POTW ability to meet sludge standards and adequacy of federal, state, and local resources to establish, implement, and enforce

pretreatment limits

* Recommendations for improving pretreatment requirements

The major objectives of the study are to document and evaluate the environmental effectiveness of the pretreatment program and to identify and analyze improvements that would enhance the programs ability to achieve its environmental objectives. The study will be based principally on existing information and involve a major effort to collect existing POTWspecific data. Data collection efforts have begun and are expected to continue into the summer of 1990.

The Office of Water Enforcement and Permits is responsible for preparing the Report. Contact Debora Clovis at (202) 475-7052 or write to U.S. EPA, Permits Division (EN-336), 401 M St. SW, Washington DC 20460 for additional information.

INDEX OF PRETREATMENT BULLETINS #1-7

Categorical standards (#1, attachment A)

- Changes to ... (#2, p.7)
- Compliance dates (#3, p.3)
- Implementation of..(#2, p.5)
- Industries considered for ... (#3, p.4)
- Industries subject to categorical standards, final regulations (#1, att. B)
- Isolated wastestreams (#4, p.3)
- Leather tanning and finishing (#4, p.3)
- Metal finishing cyanide standards (#1, p.6)
- Milestone dates (#2, p.6)
- Organic chemicals, plastics, and synthetic fibers (OCPSF) (#2, p.8; #4, p.3)
- Pesticides (#2, p.8)
- Pre-1977 standards (#4, p.2)
- Stand-alone R&D facilities (#3, p.5)

Clean Water Act Amendments-

- Impacts on pretreatment (#3, p. 1)

Definitions-

- Final rules for new source, interference, and pass through definitions (#2, p.2)
- Significant noncompliance (#2, p.2)

Domestic Sewage Study-

- Federal register notice of public comments (#3, p.2)
- Proposed ammendments to 40 CFR parts 122 and 403 (#5, p.3)
- Public comments on the Advanced Notice of Rulemaking (ANPRM) (#2, p.3)

Enforcement Actions-

- Borjohn Optical Technology, Inc. (#7, p.5)
- Kopper's Settlement (#6,p. 3)
- Ocean Spray Cranberries, Inc. (#6, p.3)

Pretreatment Enforcement Initiative (#6, p.2; #7, p.2)

FDV variances (#3, p.2; #4, p.2)

General pretreatment regulations (#1, attachment A)

Domestic Sewage Study (#5, p.3)

Other changes (#2, p. 1)

PIRT rule (see Pretreatment Implementation Review Task Force)

Revisions to Appendix D (#2, p. 2)

Technical Amendments (#2, p. 1)

Guidance Document Summaries-

Developing Control Authority Enforcement Response Plans (#7, p. 4)

Development of Industrial User Permits (#3, p.9; #4, p.5; #6, p.7)

Enforcement Response Guide (06, p.5; #7, p.6)

Evaluating and reporting POTW noncompliance (#3, p.7)

Identification of wastes delivered to POTWs by truck, rail, or dedicated pipe (#3, p.9)

Local Limits, Technical Guidance (#2, p. 12)

Local Limits, Additional Guidance (#6, P.6)

PCME guidance and training materials (#3, p.6; #6, p.5)

Preventing Interferences at POTWs (#2, p.13)

Sewage Sludge Sampling and Analysis Guidance (#7, p.6)

Slug Discharges

Discharge Control (#3, P. 10)

Loadings to POTWs (#6, P. 5)

National Pretreatment Coordinators Meeting

Summary #5 (#4, p.7)

Summary #6 (#6, p. 1)

NPDES form 2a (#4, p.6)

Organic chemicals, plastics, and synthetic fibers (OCPSF) final regulations schedule (see Categorical Standards)

Pesticides (see Categorical Standards)

Pollution Prevention (#7, p.7)

PRELIM 4 (#7,p.9)

Pretreatment Enforcement Initiative (#6, p.2; #7, p.3)

Pretreatment Excellence Awards (#6, p. 1)

Winners announced (#7, p. 1)

Pretreatment Implementation Review Task Force (PIRT)

Deadline for penalty authority changes (#7, p.6)

EPA responses to PIRT

Applicability of categorical standards to federal facilities (#1, p.4)

Compliance by industrial users after a change in ownership (#1, p.4)

Enforcement against interference (#1, p.3)

Enforcement against POTWs without program applications (#1, p.5)

Enforcement of pretreatment standards (#1, p.5)

Interaction between EPA , States, and POTWs (#1, p.4)

Local limits (#1, p.2)

Tracking the development of small industrial users (#1, p.3)

Tracking the development of State Water Quality Standards (#1, p.5)

Regulatory changes (#5, p. 1)

Pretreatment Report to Congress (#7, p.2)

Pulp and Paper Mill Dioxin Discharges Received by POTWs (#6, p.3)

Radioactive Waste (#3, p. 10)

RCRA requirements for POTWs (#1, p.6)

Removal Credits (#3, p.3)

Third Circuit Court of Appeals ruling (#2, p.3)

Reportable noncompliance (#2, p. 10)

Sludge regulations (#3, p.2; #4, p. 1; #6, p.4)

Enforcement Strategy (#6, p.2)

Required limits in permits (#2, p.2)

Strategy for interim implementation of sludge requirements in permits issued to POTWs (#4, p. 1)

Software

PCME (#3, p.6; #5, p.3)

PRELIM (#2, p. 11)

PPETS (#3, p.7; #4, p.7)

Storm Water Regulations (#6, p. 5)

Superfund wastes and POTWs (#4, p.5)

Training-

City Attorneys' Workshop, update on development of (#6, p.6)

Local limits workshops (#4, p.5)

PCME instructor's manual (#4, p.5)

Pretreatment facility inspection field-study training program (#4. p.4)