

United States Environmental Protection Agency
Office of Wastewater Enforcement and Compliance (EN-336)

PRETREATMENT BULLETIN

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HIGHLIGHTS

PROMULGATION OF PART 503 SLUDGE REGULATIONS AND REVISIONS TO PERMIT APPLICATION RULES	1	
PRETREATMENT AWARDS	2	
EFFLUENT GUIDELINES TASK FORCE UPDATE		4
DEVELOPMENT OF NEW NPDES FORMS		4
DEVELOPMENT OF GUIDANCE FOR INDUSTRIAL/COMMERCIAL SOURCES		5
GUIDANCE TO PROTECT POTW WORKERS IS NOW AVAILABLE		6
PRETREATMENT ENFORCEMENT INITIATIVE		7
WASTEWATER PRIVATIZATION	7	
AMSA's THIRD ANNUAL PRETREATMENT COORDINATORS' MEETING		8
NEW EPA/AMSA STUDY	8	
TOTAL QUALITY PRINCIPLES FOR PROGRAM MODIFICATIONS		9

WELCOME TO THE PRETREATMENT BULLETIN

The Pretreatment Bulletin is published by the U.S. Environmental Protection Agency's Office of Wastewater Enforcement and Compliance. It is primarily intended for the professionals who administer the National Pretreatment Program. Pretreatment refers to the alteration, reduction or elimination of pollutants prior to or in lieu of their being discharged to municipal wastewater treatment plants ("publicly owned treatment works" or "POTWs"). The National Pretreatment Program is a joint regulatory effort by EPA, states, and nearly 1,500 municipalities to ensure that industrial and commercial discharges of pollutants to POTWs do not interfere with POTW operations, impair worker health and safety, pass through to receiving waters, or contaminate sewage sludge.

PROMULGATION OF PART 503 SEWAGE SLUDGE REGULATIONS AND REVISIONS
TO PERMIT APPLICATION RULES

On November 25, 1992, the Environmental Protection Agency's (EPA) Deputy Administrator signed the Agency's long-awaited sewage sludge regulations, which promote the beneficial use and disposal of sewage sludge and ensure that public health and the environment

are protected from potential adverse effects of pollutants in sewage sludge. The new regulations, to be codified at 40 CFR Part 503, are expected to be published in the Federal Register in mid-February.

These regulations control the quality of sewage sludge that is applied to the land, distributed and marketed, placed in a sludge-only landfill or other surface disposal site, or fired in a sewage sludge incinerator. Certain pollutant limits, pathogen and vector controls, and management practices are mandated for each practice regulated by the rule to ensure that sewage sludge is used and disposed in ways that protect public health and the environment. The rule rewards producers of high-quality sewage sludge and sludge products by allowing them to market their products as fertilizer, subject to regulatory control. Encouraging the generation and use of high-quality sewage sludge not only directly benefits the environment, but also improves soil fertility (sludge is a nitrogen-rich soil fertilizer), reduces air emissions from incinerators, and reduces the volume of waste to be disposed of in landfills.

Part 503 will also influence the implementation of local pretreatment programs. Pretreatment is the primary means for reducing the concentration of toxic pollutants in sewage sludge. Sewage sludge in the United States is generally of high quality already, and most publicly owned treatment works (POTWs) will be able to comply with these regulations by maintaining their current practices. POTWs, however, may wish to evaluate the need to strengthen pretreatment controls on their industrial users, either to comply with Part 503 or to generate sludge of sufficient quality for distribution and marketing.

The regulation sets numeric limits for 10 metals and "total hydrocarbons" (a surrogate parameter for organics in incinerator emissions) in sludge and states that limits are not needed for other pollutants that were considered in detail. For these pollutants, removal credits may be available, depending upon the use or disposal option employed by the POTW. Removal credits increase the amount of a pollutant that an industrial user (IU) may discharge to a POTW and still comply with national categorical pretreatment standards. Removal credits do this by taking into account pollutant removal by the POTW when the POTW sets the discharge limits for the IU. Clean Water Act (CWA) §307(b)(1) allows removal credits to be granted provided that:

- (1) the combined pollutant removal by the POTW and the IU equals the removal that is required of a similar industrial facility that discharges directly to surface waters; and
- (2) changing the pretreatment standard does not prevent the POTW's use or disposal of its sludge in accordance with CWA §405.

The November 25th rule included amendments to §403.7 of the General Pretreatment Regulations that specify the pollutants for which removal credits may be made available. No removal credits are available until a POTW requests and receives authority to grant removal credits pursuant to 40 CFR 403.7.

The new controls on the use and disposal of sewage sludge are designed, for the most part, to be self-implementing, meaning that anyone who uses or disposes of sewage sludge must comply with all the provisions of the regulation whether or not they have a permit. The rule

requires compliance with the monitoring and recordkeeping requirements 150 days after it is published in the Federal Register (except for the monitoring of total hydrocarbons in incinerator emissions, for which one year will be allowed). The rule also requires compliance with all other standards as soon as possible, but in no case later than 12 months from the date of publication (or 24 months if construction is required). Permits will be issued over time and the application regulations are being modified to reflect a phased approach. The first phase will focus on facilities needing site-specific limits (e.g. incinerators), who will need to apply for permits within 180 days after Part 503 is published. These revisions should be published in the Federal Register in mid-February.

For more information on the implementation of Part 503 Sewage Sludge Regulations, please contact: Ross Brennan, Permits Division (EN-336), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-6928. For technical information on the regulations, please contact: Al Rubin at (202) 260-1311. Copies of the regulations will be available in February upon written request from: Al Rubin, Office of Science and Technology, U.S. EPA (WH-586), 401 M Street, SW, Washington, DC 20460.

PRETREATMENT AWARD WINNERS

The winners of the 1992 National Pretreatment Program Excellence Awards were honored at the Water Environment Federation (WEF) Annual Conference in New Orleans, LA, on September 21, 1992. These awards recognize POTWs with exemplary local pretreatment programs that reduce the risk of pass through of toxic pollutants and interference with the operations of treatment facilities that may be caused by toxic pollutants. Through their work with local industry, these POTWs also benefit from improved sludge quality and reduced risks to the health and safety of treatment plant workers. Forty-nine nominations were received from all 10 EPA regions in February 1992. An awards review committee consisting of representatives from state offices and EPA regional and headquarters staff evaluated the applications. The first and second place winners in three size categories based upon millions of gallons per day (MGD) of flow are:

First Place

0-5 MGD: Rogers Pollution Control Facility
Rogers, AR

5.01-20 MGD: City of Zanesville, OH

> 20 MGD: Anne Arundel County Department of Utilities
Annapolis, MD

Second Place

0-5 MGD: Warwick Sewer Authority
Warwick, RI

5.01-20 MGD: City of Rome WPCP
Rome, GA

> 20 MGD: Palo Alto Regional Water Quality Control Plant
Palo Alto, CA

All of the winners are to be congratulated for their outstanding pretreatment programs. Beginning with this edition of the Pretreatment Bulletin, we will present summaries of selected award-winning POTWs. This Bulletin features summaries of winners in the 0-5 MGD category. Similar versions of these summaries first appeared in WEF's Operations Forum, October 1992.

First Place, 0 to 5.0 MGD: Rogers Pollution Control Facility, Rogers, Arkansas

The Rogers facility has established a positive approach to enforcing pretreatment standards and requirements, which is reflected in the many unique elements of its pretreatment program. Punitive measures are taken only when an IU is found to be in significant noncompliance (SNC). SNC is determined on a moving six-month basis to encourage IUs to take immediate corrective action.

Representatives of the industrial community are invited to attend an annual meeting where they are updated on regulations, program modifications, and compliance status. Rogers uses this occasion to encourage industrial compliance by presenting an industrial compliance award to IUs that have satisfied permit requirements for the past 12 months. In order to facilitate community-wide recognition of the event, local media provide coverage and the mayor of Rogers personally presents the awards. Last year, three IUs received the award.

Another unique element of the program is the requirement that each significantly non-compliant IU report details of its noncompliance to the public. To ensure that adequate pretreatment funding is available, a depreciation account is being funded for replacing vehicles, equipment, and instrumentation.

To ensure that all industries are included in its pretreatment program, Rogers uses a Chamber of Commerce list of industries, the telephone book, and water utility accounts to make certain its list is complete. An industrial waste survey is issued to each industry on the list.

Pretreatment personnel attend EPA- and consultant-sponsored conferences and seminars to remain informed of upcoming changes. Plant staff also continuously strive to keep the industrial community, public officials, and general public informed, educated, and involved. Each month, staff prepare a pretreatment report that is available for review by the public.

Second Place, 0 to 5.0 MGD: Warwick Sewer Authority, Warwick, Rhode Island

The city of Warwick faces unique problems that require more stringent limits to minimize pass through and interference problems. Local limits for Warwick, on average, are six times more stringent than EPA categorical standards, and all significant industrial users have installed pretreatment systems capable of consistently meeting these limits.

The Warwick Sewer Authority's pretreatment program involves the industrial community and public officials in several ways. Whenever there are changes in the authority's rules and regulations, a public hearing notice is put in the local newspapers and comments from industry and the public are solicited.

Warwick's pretreatment section is well aware of the value of educating industries, state and local officials, and the public about the need to improve water quality. Informational meetings are frequently held with industry as well as such groups as septage haulers and drain layers to explain both state and local regulations.

The authority spends \$10,000 per year on the publication and distribution of Waterwatch, which is mailed to over 500 people throughout the state. Waterwatch provides information on the activities about control authority and pretreatment activities and includes positive articles, such as those which highlight industries that have overcome serious pretreatment problems.

Warwick's pretreatment program is independent and self-supporting, with a budget that is separate from both the treatment plant and municipal budgets. Its budget is reviewed annually, and the revenue collected from permit fees, monitoring charges, and fines is used to support the program.

The enforcement of pretreatment standards and the achievement of industrial user compliance has been a high priority for the program. When a business is illegally discharging into a river or storm drain, analytical information provided by the pretreatment department in combination with the enforcement power of the state can result in enforcement actions.

For more information about the Pretreatment Excellence Awards, please contact: Bryan Holtrop, Permits Division (EN-336), U.S. EPA, 401 M Street, SW, Washington, DC 20460 (202) 260-6814.

EFFLUENT GUIDELINES TASK FORCE UPDATE

On January 31, 1992, EPA entered into a Consent Decree affecting the entire Effluent Guidelines Program (Natural Resources Defense Council et al vs. Reilly, D.D.C. No. 89-2980). The litigation leading to the Decree was brought under CWA §304(m), which requires the Agency to publish a biennial plan for the Program. The Consent Decree requires EPA to adhere to a schedule for developing regulations and to create a Task Force to assist the Agency in planning for the Effluent Guidelines Program. The Decree directs EPA to establish the Task Force by July 1992 and defines its role as "assist[ing] the Agency in discharging its responsibility to implement the Clean Water Act" and offering advice on the long-term strategy of the Effluent Guidelines Program.

Twenty three Task Force members have been appointed from the following sectors:

- EPA regional and field offices;
- State government;
- Local government (including POTWs);

- Industry;
- Citizen groups; and
- Scientific/Academic community.

The first Task Force meeting was held on October 27 and 28, 1992, in Reston, VA. EPA staff presented a background briefing on the Effluent Guidelines Program, and members then discussed a variety of issues and problems affecting the program. The members selected three principle issue areas to focus on initially, and separate issue group meetings were conducted. The three issue areas are:

- selection criteria and methodology for preliminary industry studies;
- the role of non-water quality impacts and pollution prevention in effluent guidelines; and
- re-designing the data collection and/or rulemaking processes for effluent guidelines.

Members will continue to work on these issues at subsequent meetings and will eventually offer recommendations to EPA on ways to improve the Effluent Guidelines Program.

The next meeting will be held on February 9-10, 1993, in Arlington, VA, and additional meetings will be held on May 18-19 and August 17-18 in the Washington, DC area. For more information regarding the Effluent Guidelines Task Force please see Pretreatment Bulletin #11, p. 4, or contact: Eric Strassler, Engineering and Analysis Division (WH-552), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-7150.

EPA DEVELOPING NEW NPDES APPLICATION FORMS FOR POTWS AND SLUDGE

EPA is in the process of developing new National Pollutant Discharge Elimination System (NPDES) permit application forms for POTWs and treatment works treating domestic sewage. Form 2A will replace both Standard Form A and Short Form A, which were developed in 1973 and have not been revised since that time. It is intended to accommodate new elements of the NPDES program for municipal dischargers, including toxics controls, combined sewer overflows, and pretreatment. The Agency is developing a separate application form, Form 2S, to obtain sludge quality and management information from treatment works treating domestic sewage (including POTWs).

Form 2A requirements are to be proposed at existing 40 CFR 122.21(j) and Form 2S requirements are to be proposed at a new 40 CFR 122.21(q). EPA expects to publish these proposed rules in the Federal Register sometime in Summer 1993.

For more information about the development of Forms 2A and 2S, please contact: George Utting, Permits Division (EN-336), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-9530.

DEVELOPMENT OF TECHNICAL GUIDANCE DOCUMENTS ON THE CONTROL OF DISCHARGES FROM SMALL INDUSTRIAL/COMMERCIAL SOURCES

The Water Environment Federation (WEF) Ad hoc Source Control Committee is gathering information and data on current programs for controlling wastewater discharges to POTWs from small industrial and commercial sources. A survey of the WEF membership conducted in 1991-92 identified the four target sources listed below as being of most concern to respondents with respect to discharges to municipal sewerage systems:

1. Photo processors
2. Vehicle maintenance facilities
3. Hospitals and Medical clinics
4. Dry cleaners and Commercial laundries

The Committee intends to develop technical guidance documents for these four sources for dissemination to WEF members, municipal sanitation agencies, other agencies who are in the process of developing and implementing similar programs, small industrial/commercial sources, EPA's Pollution Prevention Clearinghouse, and the public. These documents will include a matrix of control strategies for use by POTWs. The first guidance document developed will focus on strategies for photo processors.

In December 1992, the Committee sent out requests to over 250 agencies and organizations soliciting information on their efforts related to developing or implementing programs for small commercial/industrial sources. Specifically, information was requested for the following items:

- Data/information on the nature and extent of problems caused by these types of discharges (e.g. pollutants and/or pollutant loadings);
- Control policies or procedures, current and best management practices, implementation schedules;
- Tools of implementation (permits, pollution prevention audits, enforcement orders);
- How sources are identified;
- Incentives for using source reduction;
- Program financing mechanisms, program costs, and resource needs;
- Financial aids or grants for commercial sources;
- Inspectors' training and involvement;
- How and when to involve the regulated industries;
- Partnerships (industry, trade groups/agency, or mentors);
- Out-reach groups formed for information and training;
- How to secure agency management and policy level (e.g. elected officials) support;
- Have there been improvements in wastewater or sludge quality or treatment plant permit compliance as a result of the program;
- What other measurements or benchmarks have been used to gauge the success of the program; and
- Sample documents.

Information on any of the above topics will be assembled, reviewed and used by the

Committee to develop guidelines. If you are interested in helping or participating with this project, please contact: Rob Schweinfurth, WEF, 601 Wythe Street, Alexandria, VA 22314-1994, (703) 684-2400.

GUIDANCE TO PROTECT POTW WORKERS IS NOW AVAILABLE

On July 24, 1990, EPA revised the General Pretreatment Regulations to respond to the findings and recommendations of the Report to Congress on the Discharge of Hazardous Wastes to Publicly Owned Treatment Works (the "Domestic Sewage Study"), which identified ways to strengthen the control of hazardous wastes discharged to POTWs. The revisions add two prohibitions addressing POTW worker health and safety to the specific discharge prohibitions that apply to all non-domestic dischargers to POTWs. At 40§CFR 403.5(b)(1) and 403.5(b)(7), respectively, the new regulations prohibit:

- pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed-cup flashpoint of less than 140 degrees Fahrenheit or 60°C using the test methods specified in 40§CFR 261.21; and
- pollutants which result in toxic gases and vapors within the POTW in a quantity that may cause acute worker health and safety problems.

The Guidance to Protect POTW Workers From Toxic and Reactive Gases and Vapors fulfills EPA's commitment to issue guidance to assist POTWs in implementing the new specific prohibitions. The guidance document is designed to:

- help the POTWs understand reactive and gas/vapor-toxic hazards and how they happen,
- give the POTWs working knowledge of certain chemicals that cause reactive and gas/vapor-toxic conditions within the POTW and at industries during inspection, and
- recommend procedures to prevent or mitigate reactive and gas/vapor-toxic conditions.

The new specific prohibitions, together with this guidance, should enable POTWs to improve protection of POTW workers from the serious health and safety problems that can occur from exposure to toxic and reactive substances in industrial discharges.

Copies of the document are now available. A number of EPA regional and state pretreatment coordinators are distributing the document to pretreatment POTWs. Those pretreatment POTWs that do not receive the document should contact their Regional Pretreatment Coordinator (listed on page 10 of the Pretreatment Bulletin) to find out how the document is being distributed in their region. In regions and states where the document is not being directly distributed, pretreatment POTWs can obtain a copy from Chip Fletcher at (202) 260-0108. Supplies are limited; we are able to send only one copy to each pretreatment POTW. Others who would like copies or pretreatment POTWs who would like additional copies should call the National Technical Information Service (NTIS) at (703) 487-4650 (NTIS No. PB92-173-236), or the National Small Flows Clearinghouse at 1-800-624-6301. There are fees for these services.

PRETREATMENT ENFORCEMENT INITIATIVE: PHASE THREE

On October 15, 1992, EPA and the U.S. Department of Justice (DOJ) announced judicial actions against Amoco, General Mills and four other companies for violations of the National Pretreatment Program under the CWA. This announcement marked the end of the third phase of the Agency's Pretreatment Enforcement Initiative. The overall initiative, the first phase of which was announced in October 1989, has resulted in at least 670 penalty actions taken against industrial facilities and POTWs by EPA, DOJ, states, and local governments. These penalties totaled more than \$54 million (including approximately \$6 million in environmental projects).

EPA and DOJ announced the filing of lawsuits against Amoco Oil Co. of Casper, WY, and Pellerin-Milnor Corporation of Kenner, LA. The Agency also announced settlements in prior suits against Mastex Industries, Inc., of Holyoke, MA, for \$275,000; Pacific Southwest Airmotive, Inc., now owned by U.S. Air of San Diego, CA, for \$335,000; Crown Cork of Carolina, Puerto Rico, for \$750,000; and General Mills of Gloucester, MA, for \$480,000. The Pellerin-Milnor case has been settled for \$175,000.

In addition to the above enforcement actions, 286 other individuals and corporations have been named in federal, state, and local criminal, civil, and administrative penalty actions for violations of pretreatment requirements since May 1991. This includes more than 152 local penalty actions taken against non-complying industries by 43 municipalities.

The announcement also included 54 additional penalty actions taken by EPA and states against POTWs since May 1991, for failure to implement and enforce their approved pretreatment programs. In all, \$18.6 million in penalties have been levied against POTWs and industries since May 1991.

The continuing need for enforcement was underscored by an EPA report on industrial compliance with pretreatment standards released in June 1992. The report indicated that 35 percent of industrial facilities significantly violated their discharge limits sometime in calendar year 1990. In addition, 54 percent of industrial users were in significant noncompliance with their discharge limits, and/or monitoring and self-reporting requirements. The report did not evaluate whether industries had returned to compliance voluntarily or because of an enforcement action. Similarly, the report does not address current compliance rates. EPA believes, however, that the Pretreatment Enforcement Initiative, as well as other federal, state, and local activities, have resulted in improved industrial compliance since 1990.

In phase one of the Pretreatment Enforcement Initiative, actions were taken against 61 POTWs for failure to implement their approved pretreatment programs. In phase two, actions were taken against an additional 69 POTWs and 186 industries. Phase three marks the first time that the federally announced initiative has included actions taken by local governments to force companies into environmental compliance.

For further information on the Pretreatment Enforcement Initiative, please contact: Ken Keith, U.S. EPA (EN-338), 401 M Street, SW, Washington, DC 20460, (202) 260-3714.

WASTEWATER PRIVATIZATION

Executive Order 12803 on Infrastructure Privatization (57 FR 19063), which was signed on April 30, 1992, by President George Bush, outlines the steps that federal agencies are to take in order to facilitate the privatization of federally funded infrastructure. The Order includes wastewater treatment works that have been built with funds from the construction grants program. EPA issued notice on June 29, 1992 (57 FR 28867), that it intends to implement the Order by (1) developing an appropriate definition of "publicly owned treatment works," (2) initiating an inclusionary rulemaking process, and (3) conducting public meeting(s).

Under the CWA and the current regulatory framework, POTWs and privately owned treatment works are subject to different technology-based effluent standards and only POTWs can be required to develop pretreatment programs to control indirect discharges. Moreover, only POTWs can request financial assistance through the construction grants and state revolving fund programs. The NPDES and National Pretreatment Programs, however, do allow publicly owned facilities with private interests to be classified as POTWs for the purposes of NPDES permits and pretreatment requirements.

Since the June 29, 1992, Federal Register notice, EPA has formed an internal Agency workgroup to provide technical information and logistical support for the rulemaking process and has held two public meetings in Washington, DC, which were attended by representatives from industry, municipalities, potential privatizers, financial organizations, POTWs, environmental groups, labor organizations, and other organizations. The first public meeting was held on July 29, 1992, and included presentations by three expert panels on the potential for public-private partnerships, financial issues, and technical issues. At the second public meeting, held on October 29-30, 1992, the participants continued the discussion of issues begun during the first public meeting and helped EPA to clarify its goals with respect to the wastewater privatization process. These goals, as agreed to by meeting participants, may be characterized as follows:

- Maintain and enhance environmental quality,
- Implement Executive Order 12803, and
- Enhance private sector financing opportunities for wastewater treatment and remove barriers to the privatization of wastewater treatment facilities.

EPA is continuing to move forward with the privatization process and plans to hold another public meeting in early 1993 to discuss conceptual drafts of revised regulations and guidances relevant to the subject. In addition to a rulemaking, EPA is also considering granting waivers to certain construction grants regulations to allow selected communities to carry out privatization pilot projects.

For more information about wastewater privatization or to offer your comments, please contact: William Hall, Permits Division (EN-336), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-1458, e-mail: INTERNET: hall.william@epamail.epa.gov.

AMSA'S THIRD ANNUAL PRETREATMENT COORDINATORS' MEETING

The Association of Metropolitan Sewerage Agencies (AMSA) held a three day workshop for its member agency pretreatment coordinators in Phoenix, Arizona, from November 4-6, 1992. Nearly 160 people, from 32 states, attended the workshop. Sam Hadeed, AMSA's Director of Technical Services and Regulatory Affairs, stated that the organization has 147 member agencies in 41 states, which serve a combined municipal sewer system population of nearly 100 million people. Representatives from 75 member agencies, more than half of the total membership, participated in the workshop. The three day workshop was further enhanced by the attendance of representatives from non-member agencies, eight EPA regions, and EPA headquarters.

The three day workshop featured an audience-interactive panel discussion with several POTWs explaining how they have successfully taken enforcement initiatives against noncomplying industrial users and also included three sessions on Enforcement Response Plans, Waste Minimization/Pollution Prevention Case Studies, and Making POTW/EPA/Region/State Partnerships Work More Effectively. For these sessions, workshop participants were divided into four groups with each group being randomly rotated after each session before proceeding to the next topic. This arrangement allowed each group, lead by facilitators, to carry out interactive and conceptual discussions on each of the workshop session topics.

AMSA member and non-member agency pretreatment coordinators welcomed the participation of a number of EPA regional and headquarters pretreatment staff. EPA attendees also felt that the workshop gave them the opportunity to gain more insight into POTW perspectives on various issues of concern to the Agency.

AMSA plans to sponsor a fourth annual pretreatment coordinator's meeting in November, 1993. For more information, please contact: Lisa Hammond, U.S. EPA (EN-336), 401 M Street, SW, Washington, DC 20460, (202) 260-3094.

NEW EPA/AMSA STUDY

EPA and AMSA are about to enter into a cooperative agreement to perform a pretreatment study which will identify and assess measures of environmental and programmatic effectiveness within pretreatment POTW programs. In the past, the efficacy of the pretreatment program has been analyzed using programmatic measures which demonstrate that appropriate pretreatment infrastructures and procedures were in place and that a given level of compliance is achieved. However, these programmatic measures, alone, can not indicate if the pretreatment controls (e.g. local limits) are sufficient to meet a pretreatment program's environmental objectives. Therefore, EPA and AMSA will attempt to find a balance between programmatic measures and environmental measures which can demonstrate success.

A working group consisting of POTWs, EPA, environmental groups, states, and industries will oversee the study. Focus groups consisting of interested parties will be formed. The focus groups will have the challenge of determining all of the possible measurable indicators of what is perceived as best practices and operations that achieve programmatic effectiveness

(e.g. local limits, etc.) and environmental effectiveness (e.g. load reductions, sludge quality etc.). These measures will be field tested at POTWs to determine their individual utility. It is believed that field tests may demonstrate other underlying components of an effective pretreatment program, as well. The results of the study will be issued as a final report to the Agency.

A successful product could redefine targets and measures of the pretreatment program; this study has the potential to change all aspects of program implementation and compliance, such as POTW annual reporting, POTW oversight, and RNC/SNC criteria. The Agency expects the study to be completed by September 1993.

For more information about the EPA/AMSA Study, please contact: Lisa Hammond, U.S. EPA (EN-336), 401 M Street, SW, Washington, DC 20460, (202) 260-3094.

TOTAL QUALITY PRINCIPLES FACILITATE PRETREATMENT PROGRAM MODIFICATION APPROVALS

For several years, EPA has been in the process of incorporating principles of Total Quality Management (TQM) into its regulatory activities. TQM, a concept originally developed by W. Edwards Deming, an American statistician, is based on the following precepts:

- the quality of a product or service is a function of its customers' needs;
 - quality is the responsibility of everyone involved in creating a product or service;
 - the level of quality must be constantly monitored;
 - all the systems of an organization should be structured so as to support quality;
- and, finally,
- an organization must continually improve the way it does business in order to improve the quality of the products and/or services it offers to its customers.

Quality Action Teams (QATs) are groups of people which identify obstacles to improving quality and develop appropriate solutions to eliminate or reduce the impact of such obstacles.

In January 1992, EPA's Region 6 formed a QAT to look at the process for reviewing and approving modifications to municipal pretreatment permit programs. Approximately 123 municipalities in Region 6 have pretreatment programs.

From the customer's point of view, it took too long to get modification approvals incorporated into their permits. So the team collected information on permit language requirements; the level of detail used for reviewing city proposals for program changes; the number of letters sent to permittees to get additional information; and the time frames used for requesting and receiving information from permittees.

After analyzing the collected data, the team found several ways to streamline the permit process. For example, they developed a checklist that their customers could use to ensure their modification requests were complete before submitting them to Region 6 for approval.

Incomplete or incorrect requests are now promptly returned to the customers for appropriate follow-up. Also, municipalities can now certify that local limits were developed in accordance with EPA guidance.

Region 6 is proud to report that, by using Total Quality principles, it has shortened the process time from as much as three years to six months. These improvements have also freed up more time for regional staff to focus on the actual environmental impacts of pretreatment activities.

For more information, please contact: Lee Bohme, Pretreatment Coordinator - Permits, U.S. EPA Region 6 (6W-PT), 1445 Ross Avenue, Dallas, TX 75202, (214) 655-7532.

The following is a list of EPA Regional Pretreatment Coordinators. POTWs or other interested parties should first contact their state pretreatment coordinators. If POTWs need further assistance with program development or implementation questions or problems, please contact the EPA regional office responsible for your state.

US EPA REGIONAL PRETREATMENT COORDINATORS

REGION 1: (CT, ME, MA, NH, RI, & VT)

JACK STOECKER

U.S. EPA, REGION 1

J.F.K. FEDERAL BLDG

(WCM-510)

BOSTON, MA 02203

VOICE: (617) 565-3554

FAX: (617) 565-4940

REGION 2: (NJ, NY, Puerto Rico & Virgin Is.)

VIRGINIA WONG

U.S. EPA, REGION 2

JACOB K. JAVITZ FEDERAL BLDG

26 FEDERAL PLAZA

ROOM 845

NEW YORK, NY 10278

VOICE: (212) 264-1262

FAX: (212) 264-9597

REGION 3: (DE, DC, MD, PA, VA, & WV)

JOHN LOVELL

U.S. EPA REGION 3

841 CHESTNUT BLDG

(3WM55)

PHILADELPHIA, PA 19107

VOICE: (215) 597-6279

FAX: (215) 597-3359

REGION 4: (AL, FL, GA, KY, MS, NC, SC, & TN)

ART GURLEY

U.S. EPA, REGION 4

345 COURTLAND STREET, NE

(FPB-3)

ATLANTA, GA 30365

VOICE: (404) 347-2211

FAX: (404) 347-1797

REGION 5: (IL, IN, MI, MN, OH, & WI)

MATT GLUCKMAN

U.S. EPA, REGION 5

77 WEST JACKSON ST.

(WQP-16J)

CHICAGO, IL 60604

VOICE: (312) 886-6089

FAX: (312) 886-7804

REGION 6: (AR, LA, NM, OK, & TX)

LEE BOHME

U.S. EPA, REGION 6

(6W-PT)

1445 ROSS AVENUE

DALLAS, TX 75202

VOICE: (214) 655-7532

FAX: (214) 655-6490

REGION 7: (IA, KS, MO, & NE)

PAUL MARSHALL

U.S. EPA, REGION 7

726 MINNESOTA AVENUE

KANSAS CITY, KS 66101

VOICE: (913) 551-7419

FAX: (913) 551-7765

REGION 8: (CO, MT, ND, SD, UT, & WY)

CURT McCORMICK

U.S. EPA, REGION 8

ONE DENVER PLACE (8WM-C)

999 18TH STREET, SUITE 500

DENVER, CO 80202-2405

VOICE: (303) 293-1592

FAX: (303) 294-1386

REGION 9: (AZ, CA, HI, NV, Am. Samoa, & Guam)
KEITH SILVA
U.S. EPA, REGION 9
75 HAWTHORNE ST.
(W-5-2)
SAN FRANCISCO., CA 94105
VOICE: (415) 744-1907
FAX: (415) 744-1235

REGION 10: (AK, ID, OR, & WA)
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EPA REGIONAL PRETREATMENT PERSONNEL - THIS IS YOUR PRETREATMENT BULLETIN

It is intended to provide you with current information and new ideas that will help you to enhance the way you do business.

- Do you have any new ideas or concerns that you would like to share with others involved in the pretreatment program?
- Are there any articles you would like to see written or would like to contribute?
- Do you have suggestions about how we might improve the Pretreatment Bulletin?

If your answer is "yes" to any of these questions, please contact William Hall at the address on page 5 or at (202) 260-1458.

Any address changes or additions? In order to be on the mailing list you must be a POTW, state or EPA employee.

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