

United States Environmental Protection Agency  
Office of Wastewater Enforcement and Compliance (4203)

PRETREATMENT BULLETIN

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HIGHLIGHTS

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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.

APPLICABILITY OF CATEGORICAL PRETREATMENT STANDARDS TO  
"ZERO-DISCHARGE" INDUSTRIAL USERS

The Environmental Protection Agency (EPA) recently issued guidance concerning the applicability of categorical pretreatment standards to zero-discharge industrial users (IU) in a letter from Jeffrey Lape, Acting Chief, Pretreatment and Multimedia Branch, to Robert Babcock, Pretreatment Field Support Unit, Michigan Department of Natural Resources, dated April 16, 1993. If an IU is subject to categorical pretreatment standards, it satisfies one of four criteria for an IU to be deemed a significant industrial user (SIU) as defined by 40 CFR Part 403.3(t). Once defined an SIU, minimum requirements are established for the control authority (e.g., issuance of an individual control mechanism, annual inspection and monitoring).

An SIU includes "All industrial users subject to Categorical Pretreatment Standards under

40 CFR Part 403.6 and 40 CFR Chapter I, Subchapter N" (40 CFR Part 403.3(t)(1)). For this purpose, an IU is deemed to be a categorical industrial user (CIU) when it meets the applicability requirements for a specific category and is subject to pretreatment standards for existing sources (PSES) or pretreatment standards for new sources (PSNS).

Although there are many industrial categories with promulgated effluent guidelines and standards, not all contain PSES or PSNS requirements. Where an IU falls within a promulgated industrial category that only provides reference to the general pretreatment provisions in 40 CFR Part 403 (or its predecessor, Part 128), this alone would not be considered PSES or PSNS requirements, and the IU would not be considered to be subject to categorical pretreatment standards. This position was articulated in Pretreatment Bulletin #3 (November 6, 1987) and in a memorandum entitled "Non-Consent Decree Categorical Pretreatment Standards" from James Elder, Director, Office of Water Enforcement and Permits, dated August 24, 1988.

The following address the applicability of categorical pretreatment standards in specific situations, including zero-discharge IUs.

1. Where an IU operates a categorical process, but no regulated process wastewater is discharged or has the potential to be discharged to the publicly owned treatment works (POTW), should the IU be considered a CIU, and therefore an SIU, even if it discharges other unregulated process or sanitary wastes?

Answer: No. If the only wastestream that an IU discharges or could potentially discharge to the POTW is not subject to PSES or PSNS requirements, it is not a CIU for purposes of that discharge or for purposes of 40 CFR Part 403. An example of this situation would be a metal finisher that discharges its sanitary wastes to the POTW and all of its regulated process wastewater to a receiving water under a National Pollutant Discharge Elimination System (NPDES) permit. This facility would not be considered a categorical industry for purposes of the SIU definition since no PSES or PSNS requirements would apply. Of course, noncategorical IUs are still subject to the General Pretreatment Regulations and local limits, may warrant periodic inspection and monitoring by the control authority, and may be considered an SIU because of the other criteria in 40 CFR 403(t).

An important example to consider here would be a metal finisher that performs any one of the six primary qualifying operations for which there is no potential to discharge at any time but also performs one of the 40 ancillary process operations for which there is a corresponding indirect discharge. This facility would be considered a categorical industry because PSES or PSNS requirements would apply to the regulated wastestream from the ancillary process. This position has been articulated in letter from Baldwin Jarrett, U.S. EPA, to Grace Scott, Michigan Department of Natural Resources, dated April 28, 1992.

2.A. If a categorical pretreatment standard requires testing or a certification statement (i.e., certification that a particular pollutant or process is not used, as in the case of paper and pharmaceutical standards) and a facility certifies that it does not use the pollutant of concern, is it still a CIU?

Answer: Yes. These are specific PSES and PSNS requirements and an IU that meets the applicability requirements of the categorical standard would be considered a CIU and thus an SIU.

2.B. Is the certification a one-time statement, or is it required as part of the categorical industry's continued compliance report?

Answer: If the categorical pretreatment standard requires a testing or certification statement, the CIU must report and certify that it is not using the pollutant of concern, and this must be done semiannually as required by 40 CFR Part 403.12, unless specified otherwise by the categorical pretreatment standard. This certification provision only applies where prescribed by a categorical pretreatment standard. Any IU that is subject to a categorical pretreatment standard (PSES or PSNS) that does not contain a certification requirement must sample and report on all regulated pollutants at least twice per year even if it is not using the pollutant of concern.

3. If an IU is subject to a categorical pretreatment standard which provides a requirement of "no discharge of pollutants", or similar requirement, is the IU considered a CIU?

Answer: Yes, provided that there is a potential to discharge a wastestream that is subject to the standard. There are a number of categorical pretreatment standards which have PSES or PSNS requirements that contain such language. An IU subject to this particular PSES or PSNS requirement is considered a CIU, and thus an SIU. However, if the only wastestream that an IU discharges or could potentially discharge to the POTW is not subject to PSES or PSNS (i.e., sanitary wastes), then the analysis would be as set forth in question 1 above and the facility would not be considered a CIU. This further develops the position articulated in the memorandum referred to above from James Elder, dated August 24, 1988, and another memorandum from James Elder, dated February 16, 1989, entitled "Conventional Pollutants Regulated by Categorical Pretreatment Standards."

4. If a facility has a regulated process wastestream and employs a treatment system that results in 100% recycle, is it considered a CIU?

Answer: The situation here is essentially the same as in question 1. If the IU uses a 100% recycle of regulated process wastewater and does not have the potential to discharge regulated process wastewater to the POTW, the IU would not be considered a CIU.

CIUs that employ a 100% recycle or claim no discharge of regulated process wastewater should be thoroughly evaluated through an on-site inspection to determine if there is any reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement due to accidental spills, operational problems, or other causes. If the control authority concludes that no regulated process wastewater can reach the POTW, and therefore, the IU has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the IU need not be designated a CIU and thus an SIU, as provided by 403.3(t).

As a precaution, however, even if the control authority determines that a zero discharge

facility is not a CIU, it is suggested the control authority issue a permit (or equivalent individual control mechanism) to the facility containing at least the following conditions:

- "No discharge of process wastewater is permitted."
- Requirements to notify the POTW of any changes in operation resulting in a potential for discharge.
- Requirements to certify semiannually that no discharge has occurred.
- Notice that the POTW may inspect the facility as necessary to assess and assure compliance with the "no discharge requirement."
- Requirements to comply with Resource Conservation and Recovery Act (RCRA) and state hazardous waste regulations regarding the proper disposal of hazardous waste.

If you have any questions concerning this guidance, please contact: Bryan Holtrop, Permits Division (4203), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-6814

#### WAIVERS FROM PH LIMITS APPLICABLE TO INDUSTRIAL DISCHARGES TO POTWS

The Office of Wastewater Enforcement and Compliance (OWEC) recently responded to a question from the New Jersey Department of Environmental Protection and Energy (NJDEPE), regarding NJDEPE's proposed policy on waivers from pH limits applicable to industrial discharges to POTWs (letter from Cynthia Dougherty, Director of the Permits Division, to Mary Jo Aiello, Chief of the Bureau of Pretreatment and Residuals, NJDEPE, dated May 13, 1993). The question concerned the application of 40 CFR 401.17, which allows facilities that discharge to surface waters and employ continuous pH monitoring to exceed certain pH limits one percent of the time. NJDEPE inquired whether an analogous policy could be made to discharges to POTWs.

OWEC responded by saying that an analogous policy could be applied to discharges to POTWs, subject to several restrictions. First, the federal pretreatment regulations contain a specific prohibition against discharges with a pH below 5.0, from which no waivers are allowed unless the treatment works is specifically designed to accommodate such discharges (40 CFR 403.5(b)(2)). Second, although the General Pretreatment Regulations (40 CFR Part 403) do not include an upper pH limit applicable to all discharges, some categorical pretreatment standards do so. Waivers from the requirements of those categorical standards would not be allowed unless expressly permitted by the standards themselves. Third, a POTW may not grant a waiver from a local limit if such waiver would cause pass through or interference.

Since local limits are based on considerations at each POTW, it would not be appropriate to institute a waiver of local limits that applies throughout the approval authority's jurisdiction regardless of conditions at individual POTWs. So long as POTWs act consistently with their obligations not to allow pass through or interference, however, they might implement waivers from local limits that apply either more or less frequently than the 1% waiver applicable to direct discharges under 40 CFR 401.17. Of course, if it wishes, an approval authority could cap all waivers at 1% and thereby be more stringent than federal law, which requires no cap.

OWEC also noted that if a POTW wishes to provide waivers from pH limits that are technically based and are part of the POTW's Approved Pretreatment Program, the POTW will have to modify its Approved Pretreatment Program accordingly. The Approval Authority should consider for each POTW whether the adoption of this policy is a "change to local limits, which result in less stringent local limits" and therefore requires a formal modification under 40 CFR 403.18(c)(1)(ii), or whether it constitutes a clarification of the POTW's existing local limits.

If you have any questions concerning this guidance, please contact: Louis Eby, Permits Division (4203), U.S. EPA, 401 M Street, SW, Washington, D.C. 20460, (202) 260-9525.

## 1993 PRETREATMENT AWARD WINNERS

The winners of the 1993 National Pretreatment Program Excellence Awards were honored at the Water Environment Federation (WEF) Annual Conference in Anaheim, California on October 4, 1993. 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. An awards review committee consisting of representatives from state offices and EPA regional and headquarters staff evaluated the applications. The winners in four categories based on the number of SIUs are:

### 1-10 SIUs

- 1st Place: City of Wilmington, OH
- 2nd Place: Borough of Hanover, PA

### 11-20 SIUs

- 1st Place: City of Fort Collins, CO

### 21-50 SIUs

- 1st Place: Muncie Sanitary District, Muncie, IN
- 2nd Place: Central Contra Costa Sanitary District, Martinez, CA

### Greater than 50 SIUs

- 1st Place: East Bay Municipal Utility District, Oakland, CA
- 2nd Place: Washington Suburban Sanitary Commission, Laurel, MD

Congratulations to all the winners for their outstanding pretreatment programs. Summaries of the 1993 Pretreatment Program Excellence Award winners will appear in future editions of the Pretreatment Bulletin.

For more information about the Pretreatment Excellence Awards, please contact: Bryan Holtrop, Permits Division (4203), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-6814.

## 1992 PRETREATMENT AWARD WINNER SUMMARIES (continued from Pretreatment

## Bulletin #12)

The winners of the 1992 National Pretreatment Program Excellence Awards were honored at the WEF Annual Conference in New Orleans, Louisiana, on September 21, 1992. Pretreatment Bulletin #12 featured summaries of the 1992 winners in the 0-5 million gallons per day (MGD) category. This edition of the Pretreatment Bulletin summarizes the first and second place winners in the 5.01-20 MGD and greater than 20.0 MGD categories. Similar versions of these summaries first appeared in WEF's Operations Forum, October 1992.

### First Place, 5.01-20 MGD: City of Zanesville, Ohio

The first place winner in the 5.01-20 MGD category was the City of Zanesville, Ohio. The city's average daily flow from its single treatment plant is 6.0 MGD. It has eight SIUs, and industrial discharges make up 23% of the treatment plant's influent. Zanesville's pretreatment program is notable for its emphasis on monitoring and inspections, industrial employee training, and effective public relations.

Monitoring and inspections are two of the most important aspects of Zanesville's pretreatment program. Zanesville has developed a sampling procedure manual which describes the proper sampling, preservation, documentation, and maintenance of the sampling equipment in the industrial pretreatment program. Because of this manual, city pretreatment personnel understand the importance of details, such as the need for tubing changes between samples, proper cleaning of the sample bottles, and general maintenance of field samplers and flow meters.

Zanesville's pretreatment program offers training for industry employees on proper sampling and data collection. This investment helps to ensure that the quality of data from the industries' self-monitoring programs remains high. The city pays all expenses, including wages, for industry employees who attend these training sessions.

Zanesville recognizes that effective public relations are necessary if industries and the community are to support its industrial pretreatment program. The city works to achieve good relations by visiting all industrial officials and by involving the community in the operation of all its programs.

It has always been the Zanesville's policy to enforce its sewer use regulations. However, city pretreatment officials have found that enforcement is most effective when it involves good communication, planning by both city and industrial officials, and mutual understanding.

### Second Place, 5.01 to 20 MGD: City of Rome Water Pollution Control Plant, Rome, Georgia

As a relatively small city on the banks of three rivers, Rome chooses to make clean water its foremost responsibility. This is evident in the city's implementation of its pretreatment program. By using stringent local limits, Rome is able to prevent plant performance inhibition and ensure that the quality of the receiving stream is protected.

Ensuring accurate compliance monitoring data is an effort that begins and ends in the Rome laboratory. Sample collection equipment is cleaned and prepared in exemplary fashion. Rome's laboratory personnel are responsible for monitoring IUs. Sample collection in the field is performed with the same noteworthy care as collection container preparation.

Rome's laboratory maintains a written quality assurance/quality control (QA/QC) program. The senior laboratory analyst, who is in charge of industrial monitoring, is also the lab's QA/QC officer. The program ensures analyst performance and procedure effectiveness by monitoring and recording the results of all QC items, such as calibration, blanks, standards, and equipment maintenance.

Rome has made an effort to involve its IUs in executing the pretreatment program. City staff meet with industry personnel and make presentations to educate and inform industries about how their performance affects the POTW. IUs are required to provide, maintain, and staff a pretreatment system, which will ensure that pretreatment standards are met.

Rome has an aggressive agenda to bring industries into compliance and keep them in full compliance with pretreatment standards and requirements. When the city monitors an industry as a result of the industry's noncompliance, the industry is required to pay the cost of the additional analyses. To further ensure adequate funding, the POTW budget and expected expenditures are forecast five years in advance and then the budget forecast is modified each year to meet current needs.

First Place, Greater than 20.0 MGD: Anne Arundel County Department of Utilities, Annapolis, MD

Anne Arundel County has developed a comprehensive and effective pretreatment program that employs innovative measures to protect and improve the waters of the Chesapeake Bay and the Little Patuxent River. Its motto, "Striving for Excellence," embodies the department's commitment to reliable service and a clean environment.

Anne Arundel County works to maintain its current Class I sludge rating by implementing stringent local limits. This rating allows the application of biosolids to farmland, which is the most cost-effective and desirable use or disposal method for the department at this time. These stringent local limits will also enhance the water quality of the Chesapeake Bay and Little Patuxent River by limiting and reducing the amount of metals that enter these waters.

Public participation and awareness are instrumental in the acceptance and effective implementation of the department's pretreatment program. Many public comments on fees, monitoring requirements, and inspection procedures have been incorporated into the pretreatment program.

The pretreatment program is structured to protect the welfare of residents and county workers as well as the aquatic life and recreational uses of the water ways. The pretreatment program is a high priority in Anne Arundel County and is supported with adequate funding,

equipment, and trained staff.

Second Place, Greater than 20.0 MGD: Palo Alto Regional Water Quality Control Plant, Palo Alto, CA

Since EPA approved Palo Alto's pretreatment program in July 1981, the program has been effective in controlling and reducing pollutants discharged to the plant and to San Francisco Bay. The influent loading for lead, copper, and nickel has decreased by 76%, 80%, and 94%, respectively, since 1980. For the same period, the effluent loading for the same metals has decreased by 84%, 87%, and 94%, respectively.

In 1990, the Palo Alto plant and the two other wastewater treatment plants discharging to the lower south bay embarked on a metals source control program for non-industrial contributions of silver, copper, nickel, zinc and other metals. Because of relatively poor natural action in the south bay, EPA's water quality criteria are applied directly to the effluent with no mixing zone. This results in extremely stringent metals limits in the plant's NPDES permit.

After an investigation, photoprocessing wastestreams were identified and selected for a pilot control program, which began with an education and control program for the 400 photoprocessing and medical facilities in its service area. Ordinance revisions effective in October 1991 required photoprocessing and x-ray labs to stop discharging untreated spent "fixer" and similar solutions. Following adoption of the ordinance, the maximum plant effluent concentration of silver was reduced by 83% over two years. Equally important, the U.S. Geological Survey data collected over the past 10 years show tissue silver concentration in clams near the outfall has dropped sharply since the program was implemented.

Palo Alto's public relations efforts include public participation, frequent educational mailings, workshops, establishment of plant-sponsored hauling and drop-off programs, permitting, and technical assistance. Other programs targeting non-industrial sources are being implemented for auto repair facilities, laboratories, cooling towers, and copper root-control agents.

For more information about the Pretreatment Excellence Awards, please contact: Bryan Holtrop, Permits Division (4203), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-6814.

## 1992 NATIONAL PRETREATMENT COORDINATORS' MEETING

Representatives from EPA, states, the Mexican National Water Commission, and the Association of Metropolitan Sewerage Authorities (AMSA) attended the 1993 Pretreatment Coordinators' Meeting in Annapolis, Maryland, held June 15-17. The meeting gave attendees an opportunity to discuss and evaluate the progress of the pretreatment program while identifying goals for the future. The meeting focused on several specific issues identified for their current significance to the pretreatment program:



- Pollution Prevention - A focus on pollution prevention builds upon the traditional command-and-control approach toward environmental protection. Rather than striving only to prevent the discharge of pollutants to individual media (i.e., water, sludge, air), the Pretreatment Program should also encourage industries not to generate pollutants in the first place.
- Ecosystem Protection - EPA is seeking to broaden its focus from concentrating on the impact at the point of discharge to include overall ecosystem protection.
- Environmental Measures of Success - EPA needs to develop standards for measuring the success of state and POTW pretreatment programs that take into account the benefit to the environment and not just the number of reports, inspections, and other procedures that only indirectly benefit the environment.
- Partnerships - Partnerships between various levels of government, industry, and environmental groups will encourage more efficient, cost-effective environmental protection. Each partner should be asking itself whether what it is asking the others to do is the best use of the limited resources available for environmental protection.
- Reinventing Pretreatment - In light of the focus on pollution prevention, ecosystem protection, environmental measures of success, and partnerships, EPA and interested parties need to look at ways to increase the effectiveness of the National Pretreatment Program.

The meeting began with general sessions, which provided a forum for discussing future challenges and issues ranging from environmental effectiveness and sewage sludge regulations to sampling issues and changes to the Clean Water Act being considered by Congress. The agenda also included several concurrent sessions which provided an opportunity for representatives from EPA headquarters, regions, and states to meet and discuss issues specific to their programs. In addition, attendees had the option of attending concurrent sessions on either pollution prevention or future compliance and enforcement priorities. The meeting provided an open forum for discussing outstanding issues and closed with a review of major issues and proposed goals for the future.

For more information regarding the 1993 National Pretreatment Coordinators' Meeting please contact: Bryan Holtrop, U.S. EPA (4203), Washington, DC 20002-4905, (202) 260-6814.

The Pretreatment Bulletin is always looking for interesting articles submitted by POTW pretreatment programs. The following article, submitted by the City of Phoenix, AZ, describes the city's successful use of show cause meetings with noncompliant IUs.

CITY OF PHOENIX CIVIL PENALTY POLICY

The City of Phoenix (Phoenix) Enforcement Response Plan (ERP) was approved by EPA Region 9 on December 5, 1991. One of the essential elements of the ERP is the use of Show Cause Proceedings (SCP) to address pretreatment violations. An SCP is a mandatory meeting between a noncompliant IU and Phoenix in which the IU is required to explain to Phoenix why increased enforcement action should not be taken against it. The ERP provides for an SCP at any time an IU has two effluent pretreatment violations during a 90-day period. At least two, but generally less than five IU violations will be addressed at an SCP.

SCPs afford Phoenix the opportunity to display its regulatory role in addressing IU noncompliance. They also allow Phoenix to provide a non-regulatory helping hand to assist an IU in identifying the problems that prevent it from being in full compliance. In addition, Phoenix uses SCPs to educate IUs as to how they fit into the total picture as users of the POTW. From an IU perspective, SCPs serve as a forum in which an IU can explain why the pretreatment violation occurred, detail the corrective action it is taking to prevent future occurrences, and ask for leniency in determining the amount of civil penalty that will be assessed.

Arizona Revised Statutes section 49-391 allows POTW operators to adopt ordinances seeking a maximum of \$25,000 per day for individual pretreatment violations. This authority has been codified in the Phoenix City Code. Phoenix has developed a civil penalty formula that is similar to the one used by EPA, using a base amount of \$300 multiplied by the sum of a series of factors. The typical range of a calculated penalty for a first time effluent violator is between \$1,500-2,500.00. Monthly average violations are multiplied by the number of IU production days during the month.

Phoenix believes that holding an SCP early in the enforcement process rather than later avoids having to respond to a large number of violations and, likewise, a large penalty figure. If Phoenix and a noncompliant IU can agree to the penalty amount, as well as corrective actions, the matter is concluded with a consent decree or settlement agreement.

When Phoenix sends notice of an SCP to an IU, it encloses copies of the Phoenix Civil Penalty Policy (CPP) and penalty calculation worksheet. Thus, the IU is fully aware at the outset of the penalty amount that Phoenix is seeking and how that amount was calculated. Phoenix believes that providing this information beforehand mitigates a potentially adversarial relationship with the IU, and encourages an open and fair discussion of the violations and remedies.

Phoenix has found that SCPs are very effective in reducing pretreatment violations. Since April 1989, Phoenix has held over 100 SCPs with its IUs. The number of pretreatment violations in each reporting year has dramatically diminished during this time. Total monetary penalties assessed to date exceed \$860,000.

The ERP and CPP allow Phoenix to respond fully to all instances of IU noncompliance in both a punitive and constructive way. The result is improved IU compliance, which contributes to Phoenix's compliance with its NPDES permits. The ERP and CPP also provide for uniformity of application and lend stability to the entire enforcement process.

For more information about the City of Phoenix Civil Penalty Policy, please contact: Lori Landrith, City of Phoenix, Water Quality Division, 3319 West Earll Drive, Phoenix, AZ 85017, (602) 262-1859.

### PCME VERSION 3.0 IS NOW AVAILABLE

OWEC has recently completed an upgrade to the existing Pretreatment Compliance Monitoring and Enforcement (PCME) software program. The PCME program is designed to assist POTWs in managing their pretreatment programs by allowing each POTW to:

- Organize and save information about each regulated IU, including inventory and permitting data.
- Establish a schedule for and save information obtained from sampling activities and inspections.
- Establish and track the compliance status of each regulated IU with all pretreatment program requirements.
- Track all enforcement actions taken by the POTW.
- Calculate significant noncompliance (SNC) for each regulated IU using established EPA policy.
- Prepare all required POTW reports in a format acceptable to EPA.

The new PCME program is designed to be more user friendly. OWEC has enhanced PCME in the following areas: improved report formats; increased ease of data entry and editing; expanded information tracking, which allows POTWs to track more IU information than previously possible; and enhanced enforcement tracking capability. OWEC has also added new pull down menus for easier access to the program elements. Many of these modifications are the result of suggestions from PCME users. Other changes are due to new EPA policies concerning the National Pretreatment Program.

If you would like to receive the revised PCME program and user's manual, please contact: Lee Okster, Enforcement Division (4202), U.S. EPA, 401 M Street, SW, Washington, DC 20460, (202) 260-8329. In your request, please indicate the type of personal computer which you use (e.g., IBM PC-Compatible) and the kind of diskette which you prefer (i.e., 5.25" or 3.5").

### PRETREATMENT GUIDANCE DOCUMENTS

Each year, a number of people write or call EPA to request copies of Pretreatment Program guidance materials. Lately, we have had to disappoint many of you because we do not have copies of some of our manuals to send out. This is because EPA has only a limited supply of manuals with which to fill the many requests we receive.

After we develop a pretreatment guidance manual, we print approximately 2,000 copies, so that we can provide one manual to each of the approximately 1,500 Pretreatment programs in the U.S., as well as to state and federal regulatory personnel. This number satisfies the immediate demand and we are left with a small inventory of manuals with which to fill occasional requests. In addition, EPA has an extremely limited amount of on-site space in which to store documents and there are many competing demands for use of that space. For these reasons, we do not print a large quantity of individual documents.

We have made an effort to make some of our manuals available through the National Technical Information Service (NTIS). NTIS is operated by the U.S. Department of Commerce and is a source for some out-of-print documents. There is a fee charged for documents obtained through the NTIS system. NTIS may be contacted at the following address:

U.S. Department of Commerce  
National Technical Information Service (NTIS)  
5285 Port Royal Road  
Springfield, VA 22161

NTIS can also be reached by telephone at 1-800-553-6847. When requesting a document, use the NTIS reference number for that document.

The EPA Office of Water (OW) has also established a Resource Center for the distribution of guidance manuals. We intend to use the Resource Center to distribute all current and future stocks of Pretreatment Program guidance manuals. If you are interested in obtaining a pretreatment manual, you may leave a message for the Resource Center at EPA headquarters at (202) 260-7786. Staff will return your call and advise you of the document's availability in the Resource Center or from an alternative source.

Below is a current table of National Pretreatment Program guidance manuals published by the OWEC Permits and Enforcement Divisions. The table indicates a publication's title, its year of publication, its EPA document number, and its NTIS number (if available from NTIS).

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.

REGION 1:(CT, ME, MA, NH, RI, & VT)  
MARK SPINALE  
PRETREATMENT COORDINATOR  
U.S. EPA, REGION 1 (WCM-2103)  
J.F.K. FEDERAL BLDG  
BOSTON, MA 02203  
VOICE: (617) 565-3554  
FAX: (617) 565-4940

REGION 2:(NJ, NY, Puerto Rico & Virgin Is.)  
VIRGINIA WONG  
PRETREATMENT COORDINATOR  
U.S. EPA, REGION 2 (2WM-WPC)  
26 FEDERAL PLAZA  
NEW YORK, NY 10278  
VOICE: (212) 264-1262  
FAX: (212) 264-9597

REGION 3: (DE, DC, MD, PA, VA, & WV)  
JOHN LOVELL  
PRETREATMENT COORDINATOR  
U.S. EPA REGION 3 (3WM-52)  
841 CHESTNUT STREET  
PHILADELPHIA, PA 19107  
VOICE: (215) 597-6279  
FAX: (215) 597-3359

REGION 4: (AL, FL, GA, KY, MS, NC, SC, & TN)  
AL HERNDON  
PRETREATMENT COORDINATOR  
U.S. EPA, REGION 4 (FPB-3)  
345 COURTLAND STREET, NE  
ATLANTA, GA 30365  
VOICE: (404) 347-3973  
FAX: (404) 347-1797

REGION 5: (IL, IN, MI, MN, OH, & WI)  
MATT GLUCKMAN  
PRETREATMENT IMPLEMENTATION COORDINATOR  
U.S. EPA, REGION 5 (5 WQP-16J)  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604  
VOICE: (312) 886-6089  
FAX: (312) 886-7804

MIKE MIKULKA  
PRETREATMENT ENFORCEMENT COORDINATOR  
U.S. EPA REGION 5 (WCC-15J)  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604  
VOICE: (312) 886-6760  
FAX: (312) 886-7804

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

PRETREATMENT IMPLEMENTATION COORDINATOR  
U.S. EPA, REGION 6 (6W-PM)  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733  
VOICE: (214) 655-7175  
FAX: (214) 655-6490

BOB GOODFELLOW  
PRETREATMENT ENFORCEMENT COORDINATOR  
U.S. EPA, REGION 6 (6W-EO)  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733  
VOICE: (214) 655-6444  
FAX: (214) 655-6490

REGION 7:(IA, KS, MO, & NE)  
PAUL MARSHALL  
PRETREATMENT COORDINATOR  
U.S. EPA, REGION 7 (WACM)  
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  
PRETREATMENT COORDINATOR  
U.S. EPA, REGION 8 (8WM-C)  
999 18TH STREET, SUITE 500  
DENVER, CO 80470  
VOICE: (303) 293-1592  
FAX: (303) 294-1647

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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 Lisa Hammond at the address on page 5 or at (202) 260-3094. Applicability of Categorical Standards (continued)

Any address changes or additions? Please send your name, address, telephone number, and NPDES permit number. In order to be on the mailing list you must be a POTW, state or EPA employee.

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