

NACWA's Comments on EPA's Effluent Guidelines Plan

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National Association of Clean Water Agencies

October 25, 2016

NACWA

National Association of Clean Water Agencies (NACWA)

- Represents nearly 300 publicly owned treatment works (POTWs)
- Members serve:
 - Populations ranging from 1,700 to 7.5 million
 - The majority of the sewered population in the U.S.



NACWA Public Agency Members

SERVING PUBLIC UTILITIES OF ALL SIZES

MEMBER AGENCIES BY SERVICE AREA POPULATION

119

POPULATION
0-149,999

105

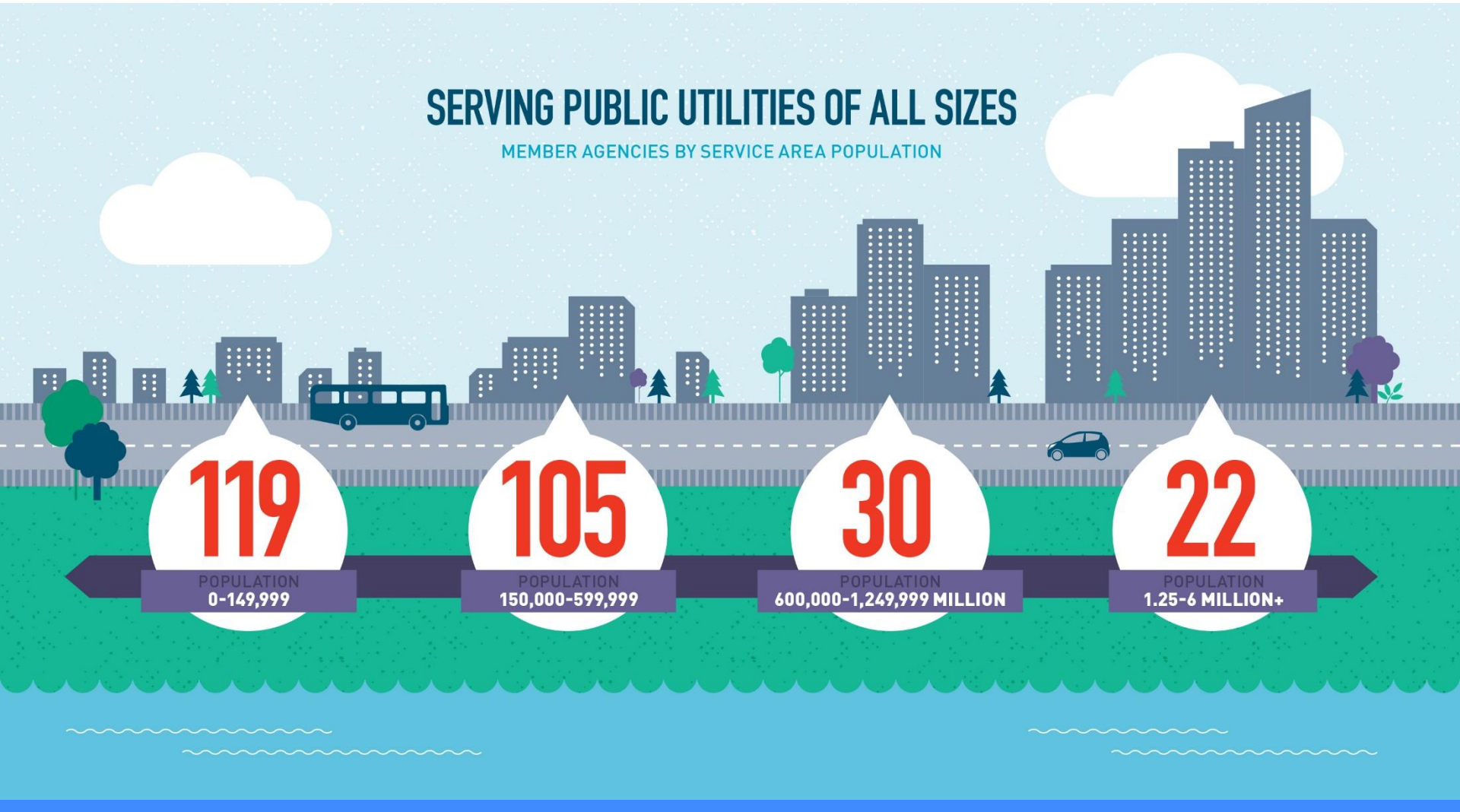
POPULATION
150,000-599,999

30

POPULATION
600,000-1,249,999 MILLION

22

POPULATION
1.25-6 MILLION+



2016 Preliminary ELG Plan

Published June 27, 2016

- No existing effluent guidelines identified for possible revision
- No industries identified for new effluent guidelines, other than those currently undergoing rulemakings
- No categories identified for detailed studies beyond those identified previously



Continuing Studies from Final 2014 Plan

EPA continuing to review or study categories announced in *Final 2014 Plan*:

- Petroleum Refining
- Centralized Waste Treatment (CWT)
- Metal Finishing
- Pesticide Chemicals
- Engineered Nanomaterials Manufacturing & Formulating



2015 Annual Review

From 2015 Annual Review, EPA identified three categories for further review:

- Iron & Steel Manufacturing
 - Specifically related to discharges of manganese, copper, lead, and nitrate compounds
- Organic Chemicals, Plastics, & Synthetic Fibers
 - Total residual chloride and nitrate compounds
- Pulp, Paper & Paperboard
 - Lead, hydrogen sulfide, mercury, and manganese



Reviews Requested in Public Comments

From public comments, EPA identified three categories for further review:

- Battery Manufacturing
- Electrical & Electrical Components Manufacturing (specifically Subpart B Electronic Crystals)
- Rubber Manufacturing, Subpart A (Tire & Inner Tube Plants Subcategory)
 - EPA determined that additional review not needed because MBT, the chemical of concern, is primarily due to wear of tires on pavement



Battery Manufacturing

- ELG promulgated in 1984 – battery technologies changed significantly since then
- Existing ELG may not cover discharges of the newer types of batteries
- Battery manufacturing is growing in the U.S.



Electrical & Electronic Components

- Questions raised regarding applicability of ELG to the manufacture of sapphire crystals
- Potential new pollutants, such as nanomaterials used in manufacturing
- Limited information available about chemicals used



Petroleum Refining Category

Detailed Study

Continued Detailed Study :

- Investigating effects of heavier crudes and new wet air pollution control
- Investigating pollution prevention and treatment methods available to reduce pollutants
- Conducted targeted information request



CWT Category Detailed Study

Detailed Study of CWT Category focused on CWTs that accept oil and gas extraction wastewater

- Information collected on wastewater characteristics, treatment technology effectiveness and costs, environmental impacts of discharges, and economic aspects of industry
- Conducted site visits and planning targeted information collection request



Metal Finishing Category Detailed Study

Detailed Study of Metal Finishing Category

- Evaluating metal finishing facilities, including electroplating
- The types of metal finishing operations and alternative chemistries used
- New sources of metal finishing wastewater
- Advanced technologies for treatment of metal finishing wastewater



Metal Finishing Category Detailed Study

NACWA providing input to EPA

- 413 versus 433 facilities: most NACWA members still have 413 facilities
- Application of zero discharge permits to metal finishers
- Total vs. free cyanide
- Contaminants from metal finishers coming through CWTs



NACWA Comments: CWT Category

- Some POTWs have experienced problems related to waste from CWTs
 - Inadequate characterization and treatment of the wastes received at CWTs
 - Tracking and trouble-shooting difficult for hauled wastes from CWTs
- Different laws in different states – federal standards could help
- Alternative analytical methods may be necessary



NACWA Comments: Landfill Category

- Currently no pretreatment standards
 - “EPA determined that these discharges did not generally pass through or interfere with POTW operations”
- Some POTWs have experienced interference with UV disinfection
- Recent research indicates substances in leachate can quench UV light



NACWA Comments: Soap & Detergent Manufacturing

- ELG promulgated in 1975
- NACWA members report that their facilities can handle higher loads than are currently allowed
- Pretreatment standards should be reviewed to determine if they are still needed



NACWA Comments: Other Categories

Additional categories for discussion

- Hospital Category
 - Pretreatment for Ebola and other pathogens?
 - Proper disposal of wipes and other materials
- Pharmaceutical Manufacturing Category
 - ELG promulgated in 1976, amended in 1983, 1998, and 2003
 - NACWA members report that it is difficult to implement



Previous Comments

Dental Amalgam Separator Rule: NACWA maintains position that the proposed rule is unnecessary and should be withdrawn

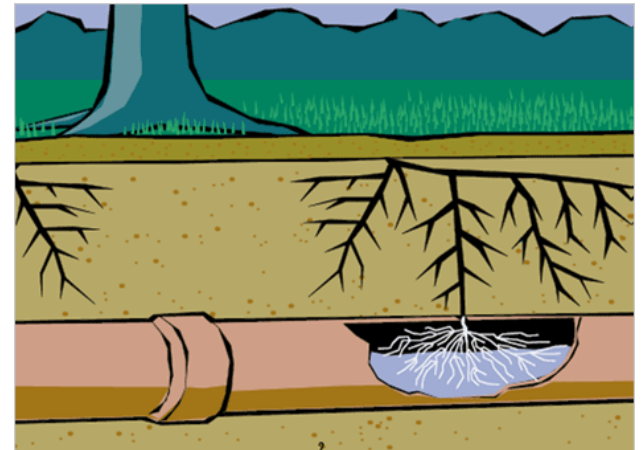
- POTWs currently meet all mercury requirements for effluent and biosolids – pass through/interference are **not** occurring
- Successful state and local dental amalgam separator programs have been established when needed
- EPA overestimates the environmental benefits and underestimates the costs of the rule



Pesticides:

Diquat Dibromide

- Root control important for sewer line maintenance
- Potential interference with biological treatment
- NACWA recommended requiring 24-hour advance notice to POTW for all root treatment chemicals



Pesticides: Lithium Hypochlorite

- Used in swimming pools, spas, and hot tubs
- NACWA supports:
 - Statement of risk to aquatic environment
 - Label language: “...contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge pool or spa water to any location that flows to a gutter or storm drain or natural water body unless discharge is approved by state and local authorities.”



Pesticides: Malathion

- Used to treat head lice – usage will peak during outbreaks
- NACWA recommended that EPA's biological evaluation include:
 - Indoor use to treat lice
 - Formation of malaoxon, which is more toxic to aquatic organisms, in wastewater disinfection process
 - Potential to interfere with wastewater treatment processes



FDA Triclosan Ban

- FDA banned Triclosan in consumer soaps and washes on September 6
- Triclosan not shown to be safe and effective
- Review of healthcare uses and hand rubs coming next



Thank you!

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NACWA