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Categorical Pretreatment Standards: Allen Gilliam (Arkansas Department of Environmental Quality Pretreatment Coordinator) 2016 Annual Pretreatment Program Workshop

Arkansas Environmental, Energy, and Water Law Blog

08/04/2016

The 32nd U.S. Environmental Protection Agency Region VI & Region VI Pretreatment Association Annual Pretreatment Program Workshop ("Workshop") was held in Frisco, Texas from August 1st – 4th.

Mr. Allen Gilliam, Arkansas Department of Environmental Quality State Pretreatment Coordinator undertook a presentation at the Workshop titled *Categorical Pretreatment Standards* ("Presentation").

The Clean Water Act ("CWA") requires the establishment of categorical standards for both direct and indirect discharges. They include standards for facilities discharging directly into a jurisdictional waterbody (i.e., "direct dischargers") and those whose effluent is routed to a Public Owned Treatment Works ("POTW") (i.e., "indirect dischargers") discharging effluent into a POTW.

The CWA requires that the United States Environmental Protection Agency ("EPA") establish "pretreatment standards" that an industrial user's wastewater must meet prior introduction into a POTW. Their purpose is to prevent the discharge of pollutants that "pass through," "interfere with," or are "otherwise incompatible" with the operation of a POTW or which are not susceptible to treatment by the POTWs. Pretreatment standards are designed to ensure that wastewater from direct and indirect industrial dischargers are subject to similar levels of treatment.

One set of pretreatment provisions are National Categorical Standards. The EPA has promulgated such standards for a number of categories for industrial users. These standards can constitute numerical, technology-based discharge limits derived from assessment of the types and amounts of pollutants discharged that typically interfere with or pass through POTWs with secondary treatment processes.

Mr. Gilliam's presentation provided background on categorical pretreatment standards. He notes:

- They are technology-based, national and uniform
- Required by Sections 307(b) and (c) of the Clean Water Act
- EPA is required to publish a 304(m) plan once every two years in the Federal Register

The presentation included the categories that have been targeted and their location in the Code of Federal Regulations.

Also addressed were the technologies to meet categorical standards such as:

- Best practicable control technology currently available
- Best conventional pollutant control technology
- Best Available Technology Economically Achievable
- New source performance standards

The categoricals for pretreatment standards include:

- Pretreatment standards for new sources
- Pretreatment standards for existing sources

The development process for pretreatment standards and the general provisions found in categorical standards were reviewed.

The presentation includes a chart of 31 categoricals and possible SIC code correlations. The task of determining what category a particular process is within is undertaken and “metal molding and casting” is addressed as an example. Also included are “tips” for determining if the industrial user is a categorical with PSES/PSMS. Further, the critical determination of whether a process is existing or a new source is reviewed.

[A copy of the presentation can be downloaded here.](#)