

OPEN CHANNEL NEWS

MCES Industrial Waste & Pollution Prevention

Issue # 22 / April, 2006

Metropolitan Council Environmental Services

Metropolitan Council Environmental Services (MCES) is one of three divisions of the Metropolitan Council, a regional public agency working for the seven-county metropolitan area. The mission of MCES is to provide wastewater services that protect the public health and environment while supporting regional growth.

Services provided by MCES ensure that:

- (1) sufficient sewer capacity exists to serve planned development, and sufficient capital investments are made to preserve the region's water quality;
- (2) wastewater collection and treatment services are provided in a cost- and quality-competitive manner for 104 communities and more than 800 industrial clients; and
- (3) local plans provide for adequate water supply and nonpoint source pollution prevention in the region.

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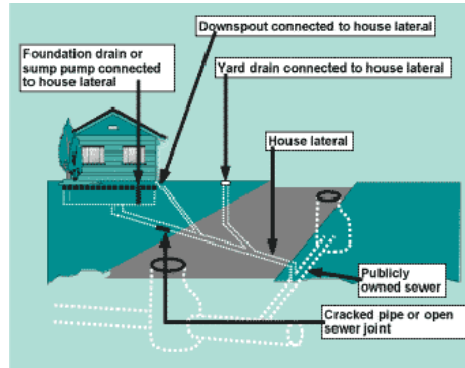
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I/I Surcharge Program Approved and Underway

MCES is moving forward with its plans to reduce the amount of inflow and infiltration (I/I) entering the regional sewer system by calling on communities to make efforts to stop their excess I/I at the source. In February, the Metropolitan Council adopted a 5-year Surcharge Program which allows the Council to set I/I goals for all communities it serves and requires the communities to meet design flow standards by 2012. Starting in 2007, communities with excess I/I will pay a surcharge that will fund I/I reduction programs. Communities may opt out of the surcharge if they commit an equal or greater level of local funding toward reducing I/I. In 2013, the Council will institute a "demand charge" for communities that don't meet their I/I goals and will use those funds to help pay the costs of expanding sewer infrastructure. If necessary, the Council could limit increased wastewater service capacity to communities with ongoing excessive I/I.

MCES has identified more than 50 of its 104 customer communities as contributing excess I/I. Other communities, however, may also have excessive I/I, therefore MCES is recommending that all communities adopt I/I control strategies.

During July, affected communities will receive notification of estimated 2007 surcharge amounts from MCES. This will be based on flow data through June 2006. Industrial users and other property owners may then receive information from their communities about increases in sewer rates and requirements to reduce I/I. Some communities have already begun to go door to door to homes and businesses alike to investigate potential I/I sources. City inspectors may visit your facility. Not only will they look for sump pumps, foundation drains, and leaky pipes, they may also investigate non-contact cooling water systems and require rerouting to a storm sewer or the installation of a closed loop system if this water is discharged into the sanitary sewer.

Get more information on I/I issues at

www.metrocouncil.org/planning/environment/inflow_infiltration.htm

Important Dates:

June 15, 2006 – Industrial Waste Customer Forum.

July 15, 2006 - Liquid Waste Hauler reports due at MCES offices.

July 30, 2006 - All Regular and Special Discharge quarterly and semi-annual reports due at MCES offices.



Streamlining Rule May Result in MORE Requirements for CIUs

The intent of the revised General Pretreatment Regulations (40 CFR Part 403), effective November 14, 2005, was to streamline the regulations and reduce regulatory burdens for both Industrial Users and MCES (as the Control Authority). In the case of Categorical Industrial Users (CIUs), however, the regulations may become more burdensome. This is because both EPA and MPCA have clarified that the existing regulation requires monitoring by CIUs for all parameters regulated by applicable categorical standards. While the revised regulation now includes a waiver provision to exclude specific parameters from the monitoring requirements, many CIUs will have increased monitoring requirements unless or until a parameter waiver is approved by MCES. In the past, many Control Authorities, including MCES, identified which of the regulated parameters listed in categorical standards were of concern at a specific CIU, and required monitoring accordingly. Now, a CIU can only forego monitoring for a regulated pollutant if they demonstrate that the pollutant is neither present nor expected to be present in the discharge and as a result, MCES has approved a waiver to forego monitoring of the pollutant. Monitoring of CIUs conducted by MCES must also include all regulated parameters. If parameter waivers are in effect, MCES must still monitor for all regulated parameters at least once during the permit duration.

The strategy MCES plans to use to address the monitoring requirement clarifications and the waiver provisions is as follows:

- Identify all CIU permits that currently do not require monitoring and analyses for all regulated parameters.
- Ensure that CIU monitoring performed by MCES will include analyses for all required parameters starting in May 2006.
- Develop a procedure to implement the new pollutant waiver provision based on requirements and conditions of 40 CFR 403.12(e)(2) and notify CIUs of waiver availability this summer.
- Require that CIU self-monitoring reports include analyses for all regulated parameters beginning with 2007 reporting periods, unless MCES has approved a waiver for specific parameters for specific CIUs.
- Adhere to the requirements of 40 CFR 403.8(f)(2)(v)(A) regarding POTW monitoring for waived pollutants.

Thus, starting in 2007 CIUs will need to monitor for all regulated parameters unless a waiver is in effect. Monitoring waivers will only be valid for the duration of the CIUs Industrial Discharge Permit, and submittal of a specific certification form will be required for each reporting period. The CIU must submit a new waiver request for each subsequent permit renewal.

As you can see, the revised rule will increase regulatory burdens for both MCES and many CIUs. It is MCES' hope that some reduction of burden will occur once the waiver system is in place. MCES will notify all permitted CIUs when the waiver procedure is developed and available. There are some other changes to the General Pretreatment Regulations that could represent actual streamlining, and MCES will investigate their applicability once this mandatory issue is addressed.

CIUs, Now That We Have Your Attention...

MCES finds it necessary once again to remind all CIUs to know your discharge limits. Because you are subject to categorical pretreatment standards, you not only have daily maximum limits, but long-term limits as well. The daily maximum limit is set by EPA to allow for an occasional spike in the concentration of a regulated parameter due to fluctuations in production and the performance of pretreatment systems. However, EPA fully expects a facility to treat its wastewater discharge to the average concentrations required by the long-term limit. Therefore, it is very important when you review your self-monitoring data and check for compliance that you compare your test results to both your daily maximum limit and your **long-term limit**. The long-term limit continues to be overlooked by many permittees.

Remember that the long-term limit is based on an average concentration over a period of time. If you monitor only once in a reporting period, then that one concentration value is considered the average for that period. Therefore, the key to staying in compliance is to monitor early in the reporting period and check your results immediately with all limits set in your MCES permit. Then, if you fail to meet a long-term limit you still have time to do additional monitoring to ensure your average concentration over the reporting period is in compliance. Failing to do otherwise can lead to a Notice of Violation and possibly other MCES enforcement actions. As required, call your MCES permit engineer as soon as you become aware of a limit violation, and consult with them before conducting any additional monitoring. They can give you guidance and options on your best plan of action.

Beware of Hidden Pollutants

Industries should know the contents of the chemical solutions they add to their processes. Some may have hidden pollutants of concern. Recently, an MCES engineer discovered from an MSDS (Material Safety Data Sheet) that three permitted electroplaters are using a chromic acid solution which contains 10 percent potassium ferricyanide. As a result, cyanide will be added to the industries' list of required monitoring parameters. With the new rules regarding categorical industrial users, these electroplaters will not qualify for a cyanide waiver, because they are adding the pollutant into the wastestream. Starting later this year, as we step through the parameter waiver process, MCES engineers will be looking much closer at process chemical additives. It would be worth the effort for industries to identify before then the ingredients in the chemical solutions added to their processes. If there is a pollutant of concern, find out if it is a necessary component or if an alternative solution is available – one that could help relieve some monitoring burdens.



Industrial Waste Customer Forum June 15, 2006

Gary Kaziukewicz (now retired) from Waldorf Corp. (A Rock-Tenn Co.) discusses MCES budget issues at a recent Industrial Waste Customer Forum.

MCES thanks Gary K. for his valuable input on many issues over the past 31 years.

Mark Your Calendars!

You don't want to miss the next Industrial Waste Customer Forum on Thursday, June 15, 2006. Important issues such as 2007 budget and rates, pretreatment program updates and development of the Council's water supply plan will be discussed. If you have any questions or concerns regarding these topics, the forum is the place to voice them.

The forum will start at 8 a.m. and is being held at the MCES meeting room located at Metro 94 Business Center, 455 Etna St., Suite 32, St. Paul. All customers holding MCES discharge permits are invited. Please RSVP before June 9 by calling 651-602-4711 and leaving a message.



Six Treatment Plants Recognized for Outstanding Performance

The Minnesota Pollution Control Agency (MPCA) in March recognized six of the Metropolitan Council's eight regional wastewater treatment plants for outstanding operation, maintenance and management from October 2004 through September 2005. The Empire, Hastings, Metropolitan, Rosemount, St. Croix Valley and Seneca Plants earned certificates of commendation at the annual MPCA awards program.

Gaylen Reetz, director of the MPCA's Municipal Division, presented the awards during the agency's Annual Wastewater Operations Conference in Bloomington. "People have come to expect dependability in their wastewater treatment systems, and you are delivering on that," Reetz said. "Thank you for the great job you are doing protecting our state's waters and resources."

The awards are based on full compliance with clean water discharge permits. They also require that facilities are overseen by properly certified operators; all required monthly and annual reports are timely and complete; and facilities have no bypasses, enforcement actions or inspections identifying significant compliance concerns.

"Each year our treatment plants achieve 99.8 percent or greater compliance with their clean water discharge permits," said Bill Moore, general manager of the Council's Environmental Services Division. "They do more than meet the stringent permit limits — in most categories they are well below the limits, further reducing pollution to our area rivers."

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MCES Address Change Starting June 1, 2006

And not before! We printed our future mailing address in the last issue of Open Channel News and some of you already started sending mail there. Unfortunately, the mail was forwarded to the old tenants of that address before finding its way to us. We apologize for any confusion this may have caused. The Metropolitan Council (including MCES headquarters staff) is in the process of moving to the new location. The move is expected to be complete at the end of May, with the address change to take place on June 1. Mail will be forwarded from the existing address to the new one for up to one year. Please continue to send all mail to our current address at Mears Park Centre, 230 East Fifth Street, St. Paul, MN, 55101, until June 1, 2006. We will send a notice to all permittees in late May with the official new address to use after June 1. Also, please note that IWPP Section staff will remain at their current location at the Metro 94 Business Center.