

Local and Federal Pretreatment Standards

IWPP Pretreatment Program

The Industrial Waste and Pollution Prevention (IWPP) section of the Metropolitan Council is the delegated Pretreatment Program authority for the seven-county metropolitan area. We regulate and monitor industrial discharges to the sanitary sewer system to ensure compliance with local, state, and federal regulations including local and federal pretreatment standards.

Local Pretreatment Standards

Local pretreatment standards are technically derived limitations set by the Metropolitan Council on discharges to the Metropolitan Disposal System (MDS) to protect its water resource recovery facilities and ensure compliance with the various facility permits and water quality standards of the receiving waters.

IWPP is required by the NPDES permits and by the U.S. Environmental Protection Agency (EPA) to conduct an evaluation of the local limits every five years. The evaluation consists of comparing the limiting factors of each treatment facility's effluent discharge limits and applicable water quality standards, sludge land spreading or incineration limits, process inhibition limits and worker health and safety concerns, with the facility's loadings and removal rates. From these considerations, a Maximum Allowable Headworks Loading (MAHL) is calculated. Known domestic/commercial loadings and a safety factor are subtracted from the MAHL. This leaves a Maximum Allowable Industrial Loading, which is then divided by the cumulative flows of the contributing industrial users to determine the local limits. If the evaluation determines that new or more restrictive local limits are needed, the Metropolitan Council will submit to the Minnesota Pollution Control Agency a suggested schedule for amending the local limits in all standard-issued industrial discharge permits.

Local limits are maximum daily allowable limits and apply at the total facility discharge of an Industrial User (IU), which includes industrial and domestic wastewater, and other non-production source. They are listed in the Waste Discharge Rules, Section 401.00 and are as follows:

Parameter	Local Pretreatment Standard
Cadmium (Cd)	1.0 mg/L
Chromium, total (Cr)	6.0 mg/L
Copper (Cu)	4.0 mg/L
Cyanide, total (CN)	4.0 mg/L
Lead (Pb)	1.0 mg/L
Mercury (Hg)	0.002 mg/L
Nickel (Ni)	6.0 mg/L
Zinc (Zn)	6.0 mg/L

Federal Pretreatment Standards

Federal (also referred to as categorical) pretreatment standards are developed by the EPA and established in Effluent Limit Guidelines. Categorical pretreatment standards are nationally applicable, industry specific, technology-based, economically feasible, and applied at the end of the categorical process.

Categorical limits may have both a maximum daily allowable limit and a more stringent long-term (4-day or monthly) average limit.

Permittees subject to categorical limits must meet the more stringent of the local and federal limits.

Categorical Parameter Sampling Waiver

Federal pretreatment regulations allow the Metropolitan Council to waive certain monitoring requirements that apply to industrial user discharges subject to a categorical pretreatment standard. The Categorical Industrial User (CIU) must be able to demonstrate that the pollutant is neither present nor expected to be present in the discharge or is present in only background levels from intake water without any increase in the pollutant due to the CIUs activities. CIUs can apply for a Categorical Parameter Sampling Waiver during permit renewal.