

INTRODUCTION TO INDUSTRIAL PRETREATMENT (IPP)

Authority for IPP is found in:

- * 40CFR Part 403 (Federal Program)
- * Michigan Part 23 Rules (Michigan Program)

WHAT DOES IPP DO?

- * Regulates non-domestic discharges
- * Establishes General and Specific discharge Prohibitions
- * Establishes Local Legal Authority, the Sewer Use Ordinance

APPLICABILITY OF IPP REQUIREMENTS

- * General and Specific Discharge Prohibitions apply to any Industrial Discharge
- * Other IPP Requirements apply to POTW's and Industrial Users that meet criteria contained in IPP regulations

GENERAL and SPECIFIC DISCHARGE PROHIBITIONS

* Apply to all non-domestic Users

* Prohibits discharges that:

- create a fire or explosion hazard (flash point < 140F)

- create a corrosive condition (pH < 5)

GENERAL and SPECIFIC PROHIBITIONS (cont.)

- cause flow obstruction due to solid or viscous pollutants
- cause interference with POTW, including high BOD.
- inhibit biological activity due to excess heat ($> 104\text{F}$ at the POTW)

GENERAL and SPECIFIC PROHIBITIONS (Cont.)

- interference due to petroleum oil
- cause acute worker health and safety problems
- trucked waste except at designated locations

CRITERIA TO DEVELOP AN IPP?

Federal Program

- * POTW's WITH A FLOW GREATER THAN 5 MGD, and
- * RECEIVE POLLUTANTS FROM INDUSTRIAL USERS (IU) THAT RESULT IN PASS THROUGH OR INTERFERENCE

Michigan Program

- * FLOW LESS THAN 5 MGD, and
- * RECEIVES POLLUTANTS FROM IU THAT RESULTS IN PASS THROUGH OR INTERFERENCE

INDUSTRIAL USERS

- * CATEGOTICAL INDUSTRIAL USERS (CIU)
 - CIU's are listed in Federal regulation. A discharge from a CIU is presumed to cause pass through or interference. Any discharge from a CIU means the POTW needs to develop a complete IPP.
 - Must be permitted by the POTW
- * SIGNIFICANT INDUSTRIAL USERS (SIU)
 - Discharges 25,000 GPD or more, or
 - Discharge more than 5% of Dry weather flow, or
 - Has the potential to adversely affecting the POTW's operation
 - Must be permitted if the POTW is required to developed an IPP

CATEGORICAL INDUSTRIES

- Aluminum Forming
- Battery Manufacture
- Canned Fruits & Vegetables
- Carbon Black
- Centralized Waste Treatment
- Coil Coating
- CAFO's
- Copper Forming
- Electrical Components
- Electroplating
- Fertilizer Manufacturing
- Grain Mills Manufacturing
- Ink Formulating
- Inorganic Chemicals
- Iron & Steel Manufacturing
- Leather Tanning
- Metal Finishing
- Foundries
- Nonferrous Metals Forming & Metal Powders
- Nonferrous Metals Manufacturing
- Oil & Gas Extraction
- Organic Chemicals, Plastics & Synthetic Fibers
- Paint Formulating
- Paving & Roofing Materials
- Pesticide Chemicals Manufacturing, Formulating & Packaging
- Pharmaceutical Manufacturing
- Porcelain Enameling
- Pulp, Paper & Paperboard
- Rubber Manufacturing
- Soaps & Detergent Manufacturing
- Steam Electric Power Generating
- Transportation Equipment Cleaning
- Waste Combustors

YOU NEED AN IPP, NOW WHAT?

- * Develop Legal Authority, Sewer Use Ordinance
- * Develop Local Discharge Limits
- * Issues Discharge Permits
- * Conduct Annual Inspections
- * Insure Permitted Industrial User meet their Compliance Monitoring Requirements
- * Prepare and submit Annual Report to DNRE.

Summary

- Some IPP requirements are self implementing and apply to all Industrial Discharges. These are the General and Specific Prohibitions.
- IPP program development requirements apply to POTW's that receive a discharge from a Categorical Industry or a discharge that causes interference with POTW operation.