

UPCOMING REGULATORY ISSUES

SUBJECT: Pretreatment

by

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The MPCA has “delegated authority” for pretreatment issues but for a number of years has been delegating some of those duties to local POTW’s. The EPA through CFR (Code of Federal Regulations) title 40 part, 403, regulates the discharge of industrial users to POTW’s. There has been growing concern over the years that the state(s) and local POTW’s have not been adequately addressing the impact of their users on the systems. A “Request for Comments” has recently been posted by the MPCA regarding these rules and possible changes.

If you wish to make a formal comment on this issue, please contact Randall Dunnette at the MPCA by phone at 651-296-8006 or email at randall.dunnette@pca.state.mn.us

This effort may reduce some confusion by both industrial users and operations staff on jurisdiction over discharge limits and who is regulating the local users. However, this will also likely create additional efforts by operations personnel in establishing “local limits” and monitoring and compliance programs for their users.

Look for more discussion of these and other upcoming regulatory issues in the WASTEWATCHER and at www.mwoa.net.