

PRETREATMENT FAQ

The following questions are most frequently asked regarding Industrial Pretreatment. This fact sheet is an overview of pretreatment history and answers to the most frequently asked questions.

DOES PRETREATMENT APPLY TO “ME,” MY COMPANY OR FACILITY?

All Commercial and Industrial sewer users contributing wastewater to any Frederick County owned POTW MUST complete an Industrial User Waste Survey. This survey includes submission of data, plans and information on the user’s activity, or lack there of. After reviewing all information and supporting data a regulatory decision is made.

If you or your facility will discharge high strength wastewater, if you are a Categorical User as listed in 40 CFR part 403, or if your wastewater discharge has the potential to impact the receiving wastewater treatment facility or the health or safety of the public, or County Employees, pretreatment will apply to you in some way or other.

IF PRETREATMENT DOES APPLY TO “ME” OR MY COMPANY HOW DO I COMPLY?

Again, **ALL COMMERCIAL AND INDUSTRIAL** sewer users must complete the Industrial Waste Survey. Without basic information, regarding the type of business activities to be conducted by the user as well as plans for review, an informed decision regarding formal permitting cannot be made.

After submission of survey information the Pretreatment Office will respond with comments and request any additional information within 10 working days. If an Industrial Discharge Permit is not required no further action on the part of the user is necessary. You may be required to submit documentation of cleaning of pretreatment devices (ie. grease traps, photo development silver recovery devices) or documentation of off-site waste hauling (ie. documentation of used oil or solvent disposal).

THIS IS THE FIRST THAT I HAVE HEARD ABOUT PRETREATMENT. IS PRETREATMENT NEW?

NO, pretreatment is not new. The first step in protection the National waters was the passage of the Rivers and Harbors act in 1899. This act was commonly known as the “Refuse Act.” The “Refuse Act” was originally intended to protect navigation.

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The first direct consideration given by the legislature to the control of water pollution occurred in 1948 with the passage of the Federal Water Pollution Control Act (FWPCA). For the next several decades the “Refuse Act” and the FWPCA acted essentially independent of each other.

In 1960 the “Refuse Act” was rejuvenated as a water pollution control measure as a result of a U.S. Supreme Court decision. In United States vs. Republic Steel Corp. 362 U.S. 482 (1960), the Supreme Court interpreted an “obstruction to navigable capacity” to include the discharge of industrial waste into a navigable river. In 1972 amendments to the FWPCA set a National goal of eliminating the discharge of pollutants into the navigable waters by 1985. The 1972 amendments to the FWPCA also established the National Pollutant Discharge Elimination System (NPDES). This amendment was to supersede the “Refuse Act” permitting program.

In February 1977, the Environmental Protection Agency (EPA) proposed General Pretreatment Regulations for existing and new sources of pollution. After receiving comments or testimony from 400 individuals or groups, Congress developed amendments to the FWPCA in December of 1977. On June 26, 1978, the Agency promulgated the General Pretreatment Regulations (40 CFR part 403). The General Pretreatment Regulations have been amended several times since its original promulgation.

These amendments include, but are not limited to, requirements for POTWs to establish local limitations and regulate industrial users. Frederick County’s first Industrial Waste Ordinance was adopted in 1985. This Ordinance was repealed in its entirety with Ordinance 92-12-047 on July 7, 1992. The “new” ordinance incorporated the newest amendments and was required by the Maryland Department of the Environment (MDE). A copy of the Frederick County Industrial Waste Ordinance is available upon request.

WHAT IS PRETREATMENT AND HOW MIGHT IT AFFECT “ME,” MY COMPANY OR MY FACILITY?

Pretreatment is the reduction, elimination, or the alteration of pollutant properties, to a less harmful state prior to discharge of wastewater to the Publicly Owned Treatment Works (POTW). You must pretreat your wastewater if your facility discharges wastewater other than waste from toilet flushing or hand washing and has the potential to or will discharge pollutant levels above Local, State or Federal limitations.

I DIDN'T HAVE TO DO THIS IN MY LAST FACILITY, WHY IS FREDERICK COUNTY DIFFERENT?

Pretreatment is not only driven by Federal regulation but by State and Local regulation as well. Some municipalities have very large wastewater treatment plants (treating hundreds of millions of waste per day). Frederick County's largest wastewater treatment facility has a capacity of 6 mgd (million gallons per day). Pollutants that may not make a difference at a much larger treatment facility have a greater impact on smaller treatment plants.

WOULD I HAVE TO DO THIS IF I WERE IN FREDERICK CITY?

Frederick County and Frederick City have similar size wastewater treatment facilities. Frederick City has an Industrial Pretreatment Coordinator. Currently Frederick County and Frederick City are working to adopt similar Industrial Pretreatment limitations.

WHY MUST I SUBMIT PLANS WITH MY SURVEY WHEN I ALREADY SUBMITTED SEVERAL SETS OF PLANS TO THE PERMITS OFFICE?

Plans and drawings submitted to the Permits Office, at the time of Building Permit Application, are not distributed to the Pretreatment Office. Utility Site Plans and building or facility floor plans/plumbing plans are needed to compare and confirm information contained in the Industrial Waste Survey. These plans are also used to conduct an on-site inspection prior to facility use and occupancy.