



## Oregon Department of Environmental Quality

# Instructions for Permits Writers With POTWS That May Need to Have a State-Approved Pretreatment Program

If a POTW is having upsets, interference, pass-through or other violations, it may be useful to get more information from the POTW to determine if a Pretreatment Program is needed. Please consult with the Pretreatment Coordinator if you feel a Pretreatment Program is needed. The following language can be added to **Schedule B**. Please read the scenarios to see if they apply.

A survey or report is required in the following cases:

1. If a major permittee **does not** have a pretreatment program, and **no** industrial waste survey has been completed, a survey must be completed.

The following language should be included in Schedule B:

### Industrial Waste Survey/Pretreatment Program

- a. As soon as practicable, but by no later than six (6) months from permit issuance date, the permittee shall submit to the Department an industrial waste survey as described in 40 CFR 403.8(f)(2)(i-iii) suitable to make a determination as to the need for development of a pretreatment program.
  - b. Should the Department determine that a pretreatment program is required, the permit shall be reopened and modified in accordance with 40 CFR 403.8(e)(1) to incorporate a compliance schedule to require development of a pretreatment program. The compliance schedule requiring program development shall be developed in accordance with the provisions of 40 CFR 403.12(k), and shall not exceed twelve (12) months.
2. If a major permittee does not have a pretreatment program, and an industrial waste survey has been completed, an update to the original industrial waste survey must be completed.

The following language should be included in Schedule B:

### Industrial Waste Survey Update/Pretreatment Program

- a. As soon as practicable, but by no later than six (6) months from permit issuance date, the permittee shall submit to the Department an update to the industrial waste survey that was completed **[insert date that survey was initially completed]**. The update should be completed as described in 40 CFR 403.8(f)(2)(i-iii) and suitable to make a determination as to the need for development of a pretreatment program.
- b. Should the Department determine that a pretreatment program is required, the permit shall be reopened and modified in accordance with 40 CFR 403.8(e)(1) to incorporate a compliance schedule to require development of a pretreatment program. The compliance schedule requiring program development shall be developed in accordance with the provisions of 40 CFR 403.12(k), and shall not exceed twelve (12) months.

3. If a minor facility is experiencing operational upsets or permit violations that may be related to industrial/commercial sources of pollutants, or where the Department has reason to believe that industrial users subject to Federal categorical pretreatment standards may be discharging to the permittee's wastewater treatment facility, a report must be completed. The permit writer should also contact the Department's pretreatment staff to make them aware of the situation.

The following language should be included in Schedule B:

- a. As soon as practicable, but by no later than six (6) months from permit issuance date, the permittee shall submit to the Department a report that identifies any operational upsets or permit violations that may be related to industrial/commercial sources of pollutants, and any industrial users subject to Federal categorical pretreatment standards that may be discharging to the permittee's wastewater treatment facility.
- b. Should the Department determine that a pretreatment program is required, the permit shall be reopened and modified in accordance with 40 CFR 403.8(e)(1) to incorporate a compliance schedule to require development of a pretreatment program. The compliance schedule requiring program development shall be developed in accordance with the provisions of 40 CFR 403.12(k), and shall not exceed twelve (12) months.