

Enforcement Outside the Box



Optimizing the
Pretreatment Program



Introduction

■ IPP Stakeholders

- Public
- Industry
- POTW
- OhioEPA / US EPA – Region V
- Vendors/Consultants



Introduction

- IPP Stakeholders
 - Sewer Maintenance
 - Health Department
 - Building Department
 - Plans & Permits



Introduction

- Optimizing Resources
 - Effective Enforcement
 - Stakeholder Synergy

Cuyahoga River, 6/22/1969



May 10, 2016

OTCO Pretreatment Workshop

No wonder it caught fire!!!



May 10, 2016

OTCO Pretreatment Workshop



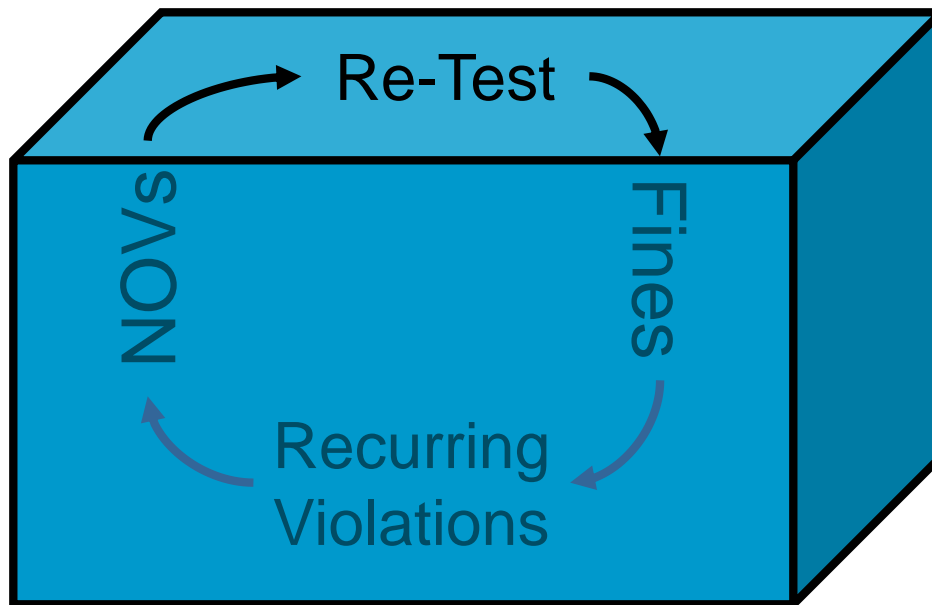
Rainbow trout caught in the Cuyahoga River, August 2008.



Effective Enforcement

- Persistent Infringement
- Traditional Approaches not getting anywhere
- Inordinate amount of resources

ENFORCEMENT





Certification Programs

- Ohio Water Environment Association
 - Certification Programs
 - Industrial Pretreatment Inspector
 - Industrial Pretreatment Operator
 - Lab Analysts
 - <http://www.ohiowea.org/certification.php>



Certification Programs

- California State University Sacramento
 - Office of Water Programs
 - Industrial Waste Treatment, Volumes I & II
 - Treatment of Metals Waste Streams
 - <http://www.owp.csus.edu/courses/wastewater.php>



OCAPP

- Office of Compliance Assistance and Pollution Prevention
 - Enforcement tool
 - *www.epa.ohio.gov/ocapp*



OCAPP

■ Benefits include:

- Saving money and improving business performance
- Achieving environmental compliance
- Reducing liability and potential for violations or penalties
- Protecting your workers' health and safety; and
- Helping preserve natural resources



OCAPP

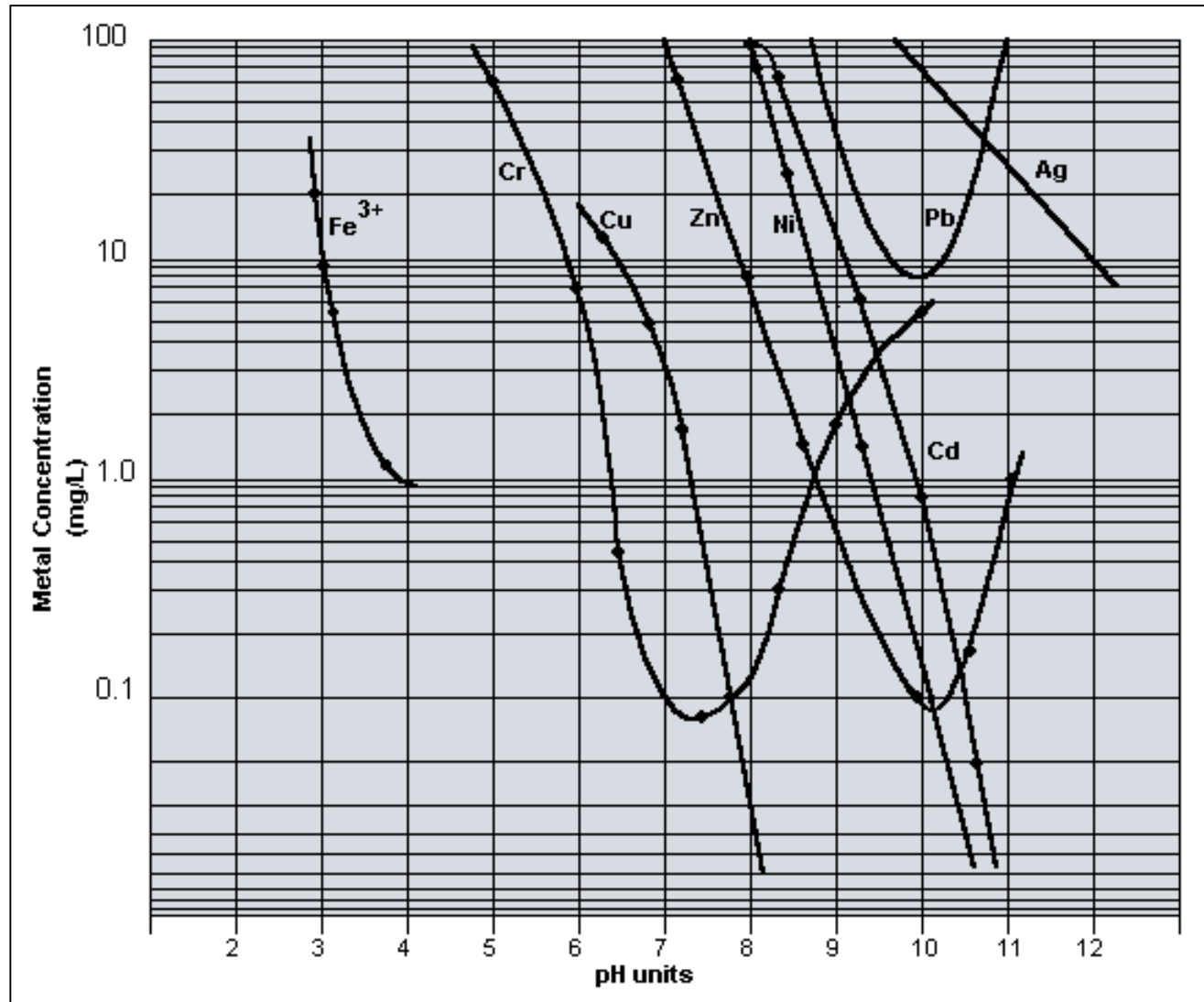
- OCAPP is here to serve your industries
- Office of Compliance Assistance and Pollution Prevention
 - Enforcement tool
 - *www.epa.ohio.gov/ocapp*



Pretreatment Equipment Review & Recertification

- Pretreatment Equipment not Engineered
- Changes in wastes being treated

Metals Hydroxide Solubility





Pretreatment Equipment Review & Recertification

- May result in processing adjustments or total system revamp
- Compliance Schedules, etc...



Industrial Waste Seminar

- Perspective
- Network



Effective Enforcement

- Certification Requirements
- OCAPP Audits
- PTE Assessments
- Industrial Waste Seminar.



Stakeholder Synergy

■ Stakeholders

- Public
- Industry
- POTW
- OhioEPA / US EPA – Region V
- Vendors/Consultants



Stakeholder Synergy

- Stakeholders
 - Sewer Maintenance
 - Health Department
 - Building Department
 - Plans & Permits
 - Colleagues



Stakeholder Synergy

- Understand
- Respect
- Communicate
- Collaborate
- Placate



Don't be foolishly proud

- Look at stakeholders as partners, including the industries
- Maybe they have an interest in supporting your initiatives
- They can help you avoid pitfalls
- Cooperation



Examples

- Legacy Mercury Presentation
- Blue Heron Homecoming Day
 - Mercury Thermometer Takeback
- FOG Program Development
 - Health Department
 - Building Department
 - FSE



Examples

- Dental BMP Development
 - ADS, ODA, NEORSD, Delta Institute
- Colleagues
 - Pretreatment_Coordinators@yahoo.com
 - R&D for Program Development
 - If you're not plagiarizing you're not trying



Questions?

- OWEA Certifications

- <http://www.ohiowea.org/certification.php>

- CSUS OWP

- <http://www.owp.csus.edu/courses/wastewater.php>

- FNeugebauer@akronohio.gov