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July 27, 2016

Engineering and Analysis Division
Office of Water

U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW

Washington, DC 20460

Submitted via www.regulations.gov

Re: Docket EPA-HQ-OPP-2015-0665, Preliminary 2016 Effluent Guidelines Program Plan

The National Association of Clean Water Agencies (NACWA) appreciates this opportunity to comment on the draft Preliminary 2016 Effluent Guidelines Program Plan. NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the U.S. NACWA members operate highly successful pretreatment programs and are actively involved in efforts to reduce the quantities of pollutants that are discharged into the sewer system.

NACWA offers the following comments on the 2015 Annual Review and ongoing studies of industrial dischargers:

- EPA is continuing its detailed study of the Centralized Waste Treatment (CWT) Category (40 CFR Part 437), with an emphasis on facilities that accept oil and gas extraction wastewaters. NACWA recommends that EPA expand the scope of this study to include all CWT facilities. Some POTWs have experienced problems related to waste from CWTs, resulting from inadequate characterization and treatment of the wastes received at the CWT. Hauled wastes from CWTs can be taken to different POTWS and into different states, which can make tracking and trouble-shooting difficult for POTWs. Additional federal standards for this category could help prevent pass-through and interference for POTWs.
- EPA determined from its 2015 review of the Landfills Category (40 CFR Part 445) that no further review was needed. There are no pretreatment standards for this category, since EPA determined in 2000 when establishing effluent

limitation guidelines (ELGs) for the category that landfill discharges generally do not pass through or interfere with publicly owned treatment work (POTW) operations. However, some POTWs have experienced interference with their ultraviolet (UV) disinfection from landfill leachate, and recent research^{1,2} indicates that substances in landfill leachate can quench the UV light. Since more POTWs are moving to UV disinfection, this issue should be further studied to determine if national pretreatment standards for landfill leachate are necessary.

- The Soap and Detergent Manufacturing Category (40 CFR Part 417) should be further reviewed by EPA to determine if the pretreatment standards for this category are still needed. The standards were set over 40 years ago, and NACWA members have reported that their treatment facilities can handle higher loads from this category than are currently allowed.

Individual NACWA members have also raised concerns about other categories, including the Hospital Category (40 CFR Part 460) and the Pharmaceutical Manufacturing Category (40 CFR Part 439). NACWA would be interested in talking with EPA more in the future about these and other categories that may deserve further review.

Thank you for your consideration of these comments. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,



Cynthia A. Finley, Ph.D.
Director, Regulatory Affairs

¹ Gupta, A., *Characterization and treatment of UV quenching substances and organic nitrogen in landfill leachates and thermal hydrolysis/anaerobic digestion centrate*, Master of Science in Civil Engineering thesis, Virginia Polytechnic Institute and State University, April 16, 2013 (https://vtechworks.lib.vt.edu/bitstream/handle/10919/22049/Gupta_A_T_2013.pdf?sequence=1).

² Zhao, R., et al. "Characterization and treatment of organic constituents in landfill leachates that influence the UV disinfection in the publicly owned treatment works (POTWs)," *Journal of Hazardous Materials*, Vol. 258-259, pp. 1-9, August 15, 2013 (<http://www.sciencedirect.com/science/article/pii/S0304389413002811>).