City of Joplin Local Industrial Pretreatment Program

PROGRAM EVALUATION AND REVISIONS

Purpose of the Pretreatment Program

- Industrial users within a City's wastewater system can pose potential threats to treatment facilities.
  - Example: Chemical Spills
- Effective Pretreatment Programs are essential.
- Limitations on wastewater discharges from Industries are established and enforced through the City Ordinance and Industry Permits.



Pretreatment Program Background

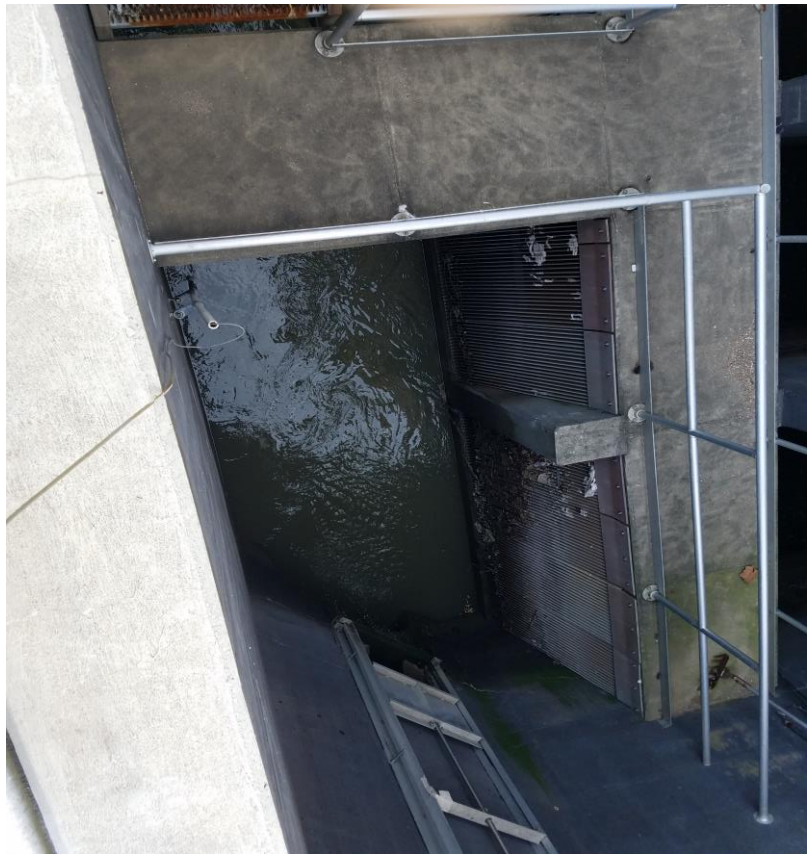
- The City of Joplin's Pretreatment Program was established in the 1980's.
- Local limits appear to have been initially established in the 1990's.
- There are currently 16 Significant Industrial Users (SIU's) discharging to the 2 WWTP's in Joplin that require discharge permits in order to protect the treatment facilities.
- There are currently 13 Non-Significant Industrial Users discharging to the 2 WWTP's the City has issued discharge permits in order to monitor and further protect the treatment facilities.



Need for Evaluation and Revision of the Pretreatment Program

- Since there has been no evaluation since the 1990's, the City of Joplin's Pretreatment Program meets the criteria for needing reevaluation since significant changes to the City's system have occurred since the establishment of the program.

- An evaluation of the City's Pretreatment Program includes:
  - The evaluation and revision of the City's existing local limits.
  - The review and revision of the City's existing Sewer Use Ordinance.
  - The review and revision of the City's existing Industrial User Discharge Permits.



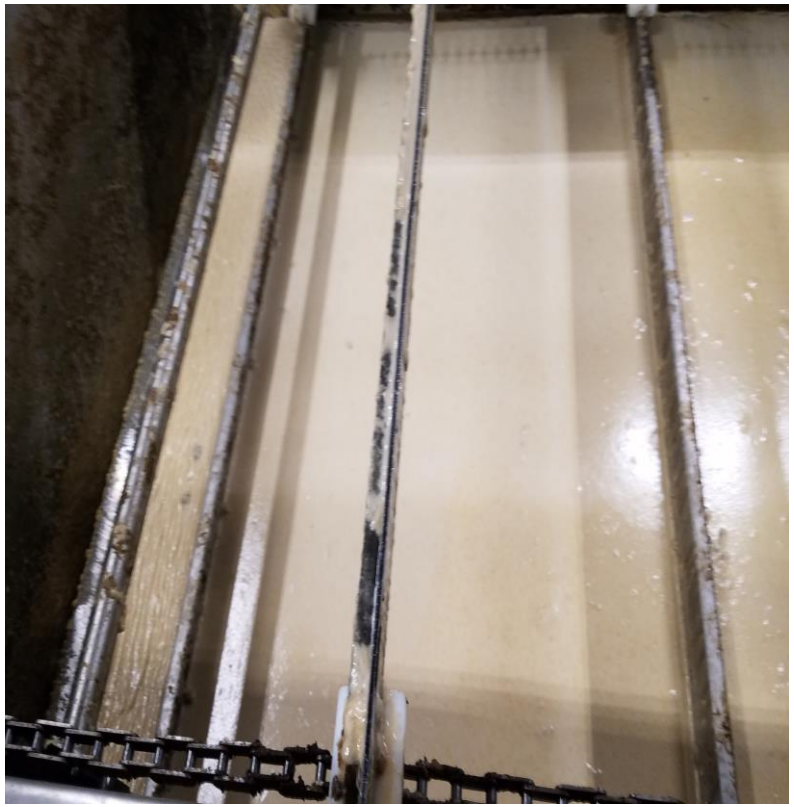
Detailed Local Limit Evaluation

- Local limits are values established by City Ordinance.
- Based on the values calculated during a thorough evaluation, new local limits are proposed.
- Currently, the City of Joplin has completed the detailed local limit evaluation for their Pretreatment program, submitted the engineering report to MDNR, and received preliminary approval from MDNR for the proposed changes to the local limits.
  - Final approval from MDNR for the revised local limits requires the Joplin City Council's formal submission of the proposed changes.



Revision to the City's Sewer Use Ordinance

- Revisions to the City's Sewer Use Ordinance is a part of the updates to the City's Pretreatment Program.
- The Operating Permits for both treatment facilities need to be revised.
- The EPA provides a model pretreatment ordinance to be used as a guide.
- Proposed changes to the City's existing Sewer Use Ordinance were developed based on the Streamlining Rule requirements and the EPA model pretreatment ordinance.
  - These proposed changes have been reviewed by MDNR and have received preliminary approval.
  - Final approval from MDNR for the revisions to the SUO requires the Joplin City Council's formal submission of the proposed changes.



Updates to Industrial User Discharge Permits

- As a final step, permits must be updated to specific limitations and/or changes in Industry operations.
- While the Missouri Department of Natural Resources does not have to approve changes to Industrial User Discharge Permits issued by the City, changes to permits to reflect new local limits and updates to the Sewer Use Ordinance cannot be made until MDNR has given final approval of the revisions to the SUO.



Remaining Steps for Final Approval of Program Revisions

- The proposed revision to the existing local limits and the City's Sewer Use Ordinance have received preliminary approval from the Missouri Department of Natural Resources.
- However, formal adoption of the revisions to the SUO along with the new local limit values cannot be completed until MDNR has provided final approval of the proposed changes to the City's Pretreatment Program.
- In order to receive final MDNR approval, a formal submission to MDNR of the proposed revisions must be made by the City with the appropriate documentation. This submission by the City is generally done after the City Council's first reading of the proposed changes to the pretreatment program. The documentation required with this submission includes:
  - The engineering report for the detailed evaluation of local limits.
  - The proposed changes to the City's Sewer Use Ordinance.
  - A statement of basis letter from the City formally submitting the proposed changes to the pretreatment program to MDNR for final approval. The letter must be signed by the appropriate City official and must acknowledge that the City Council has also approved this submission.
  - A copy of the Joplin City Council meeting minutes indicating that the Council officially approved the submission of the proposed revisions to the pretreatment program to MDNR.
  - A statement from the City attorney indicating that the City has legal authority to uphold and change the pretreatment program.
- Upon receipt of the required documentation, MDNR will review. If the supplied documents are acceptable, a mandatory public notice period (approximately 30 days) will commence to allow time for any public comments pertaining to the proposed changes to be heard and addressed.
- After the public notice period is complete and all comments have been addressed, MDNR will move to give final approval of the proposed changes to the pretreatment program. With final MDNR approval, the City can then formally adopt these revisions.
- **Consideration should be given as to how to best integrate the timelines of the approval processes for both MDNR and the City of Joplin in order to ensure the proposed changes are approved meeting the requirements of both entities and without complication.**

QUESTIONS



