

Ecology Pretreatment Update

Ecology Pretreatment Regional Coordinators

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**And any general questions*

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New aquatic standards adopted

14 new criteria added

| | |
|----------------------------|------------------------------|
| 6PPD-q (FW a) | Malathion (FW c and SW c) |
| Aluminum (FW a,c) | Methoxychlor (FW c and SW c) |
| Acrolein (FW a,c) | Mirex (FW c and SW c) |
| Carbaryl (FW a,c and SW a) | Nonylphenol (all) |
| Demeton (FW c and SW c) | PFOS (FW a,c and SW a) |
| Diazinon (all) | PFOA (FW a,c and SW a) |
| Guthion (FW c and SW c) | Tributyltin (all) |

FW – Freshwater; SW – Saltwater
 a – acute; c – chronic
 all – all criteria affected

16 criteria updated

| | |
|------------------------|-------------------------------------|
| Aldrin (FW a and SW a) | Endrin (FW a,c) |
| Arsenic (FW a,c) | gamma-BHC (FW a) |
| Cadmium (all) | Mercury (FW a) |
| Chromium III (FW a,c) | Nickel (FW a,c) |
| Chromium VI (FW a,c) | Pentachlorophenol (FW a,c and SW c) |
| Copper (FW a,c) | Selenium (FW a,c) |
| Cyanide (FW a,c) | Silver (all) |
| Dieldrin (FW a,c) | Zinc (FW a,c) |

How to use standards until EPA approval

EPA must approve WQS before Ecology can use those WQS for actions under the CWA, such as establishing effluent limits in NPDES permits

Due to EPA approval process, WQ standards (both aquatic life and human health) listed in 173-201A WAC are not currently consistent with the standards applied in CWA actions (i.e. NPDES permits)

[User-friendly version of the surface water quality standards](#)

If you are evaluating or updating your local limits in the next year, talk with your NPDES permit manager or regional pretreatment coordinator for assistance with applicable WQ standards

Updated pretreatment permit language

*added during renewal

Non-delegated:

- Changes mostly to IU survey requirements and what must be reported.

Delegated:

- Changes to POTW monitoring requirements based on review of what is necessary for local limits. Site specific monitoring may be added by permit writers.
- More specific local limit evaluation 1 year after permit issuance and then every 5 years.
- Updated slug discharge evaluation requirements for SIUs to reflect current regulation
- Updated program modification review for clarity of requirements

PFAS Identification In Permits

*Conditions added at permit renewal. Site specific determination is made by permit writer.

For POTWs: Identification of known and possible industries contributing PFAS (PFAS sources) in IU survey

- In some cases, influent monitoring (quarterly, 2 years)

- Delegated program
- Non-delegated (has known PFAS-contributing industries and/or > 5 MGD)
- Discharges to groundwater
- Reclaimed water aquifer recharge or stream augmentation

For IUs: Quarterly effluent monitoring for 2 years, source identification and identifying opportunities for reduction

eReporting of pretreatment annual reports

EPA requires pretreatment annual reports to comply with
eReporting requirements by **12/31/2025**