

The CIPCA Monitor

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Hello CIPCA! I hope that this newsletter finds everyone enjoying the pleasant summer weather that Colorado offers every year, even if it is starting to get a bit hot outside.

I am pleased to say that it has been a busy few months in the world of pretreatment. We have toured a pharmaceutical company in Boulder for CIPCA members in April. The very informative and well organized R8PA Annual Workshop in Grand Junction took place in May and CIPCA's half day Spring Workshop at NETI was in June! Needless to say it is the right time to be a part of these non-profit organizations!

With our continued dedication to providing quality training and educational opportunities to our members we have been busy planning our Fall Conference that will be held in Westminster Colorado. More information about this and other opportunities will be made available on-line and through e-mail.

Please look through this edition of the CIPCA Monitor for links that will take you to a variety of additional information on some of the current issues that we may all be interested in.

-Scott Caldwell

The Colorado Industrial Pretreatment Coordinators Association (CIPCA) Is an organization expressly for individuals who have a professional relationship within the Industrial Pretreatment profession.



Please send all questions, comments, and especially **submissions** to:

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R8PA Annual Workshop Winery Tour



Photo by Al Baker

View from the Chair & Nonylphenols

Al Baker

CIPCA Chair, Centennial Water and Sanitation District

After attending the annual R8PA conference in Grand Junction I was reminded again of one of the major benefits of attending – it's always a great networking opportunity. It's a chance to talk with someone that you may see every year as well as meeting some new pretreatment folks. You can learn new ways of doing things and also learn from the mistakes and experiences that others have had.

Conferences and workshops provide a great chance to check out pretreatment equipment, sampling equipment, contract labs, and software and to talk to the vendors. It's an easy way to see if the vendor has equipment that may work for you or if it's not really what you need.

I also find the social activities, that are part of the conference, provide a great opportunity to relax and just spend some time with fellow members. The organized tours, BBQ and other events are a fun way to enjoy and learn more about the history of the area. The "Spirits Tour" at this year's conference was a great way to get a "taste" of the vineyards, wineries and the surrounding countryside. It was also very nice to have someone else do the driving!

I particularly enjoyed listening to presentations from members that have a sense of humor in their work environment or with their customers. It's OK to take our job seriously but it is also refreshing when we can laugh at some of the situations that we encounter in our day to day activities.

One of CIPCA's main goals this year is to continue to provide tours, training and the associated networking opportunities with fellow members and industries. We hope to see all of you again in September for the fall CIPCA workshop – we have a great lineup of topics, speakers and vendors.

Gerry Fitzgibbons

CIPCA Issues Chair
City of Fort Collins

Nonylphenol stream standard

The Colorado Water Quality Control Commission met on June 7-8, 2010 to consider revisions of the Basic Standards and Methodologies for Surface Water, Regulation 31. During the rulemaking hearing, the Colorado Wastewater Utility Council requested that the nonylphenol standard be delayed. The aquatic life standard for nonylphenol is scheduled to take effect on January 1, 2011. The Council proposed that the standard be delayed until 2017. The Council believed this would provide adequate time to develop better analytical methods for this pollutant. The Commission voted to keep the original implementation date. This will be incorporated in CDPS permits as they are renewed.

House Bill 10-1125

HB 10-1125 was signed by the Governor on June 7, 2010. This act becomes effective on August 11, 2010. It will regulate disposal of waste food grease. The Solid and Hazardous Waste Commission is responsible for implementing the act. The Commission will promulgate appropriate rules by December 31, 2011. Persons, vehicles, and waste handling facilities must register with the Commission. POTWs are exempt from this requirement. To view the complete act, see:

http://www.leg.state.co.us/CLICS/CLICS2010A/csl.nsf/fsbillcont3/E39D80C083D122F6872576A80027B73E?Open&file=1125_enr.pdf

"I have left almost to the last the magic of water, an element which owing to its changefulness of form and mood and color and to the vast range of its effects is ever the principal source of landscape beauty, and has like music a mysterious influence over the mind."

- Sir George Sitwell

Grease Haulers

An article by Rich Kowalis

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The business of grease hauling and its service has been with us for 40 years or more. This type of service is required and even demanded by food servicing facilities, wastewater departments and their municipalities. The process is simple but the work is hard and involves vacuuming out the waste completely and hauling to a legal treatment facility. The work is heavy, the smell can be unbearable and not a lot of people are willing to do this type of work. The right equipment must be used to vacuum out the waste and leave with the food servicing facility collection system ready to be reused. All of this is very expensive.

Grease Hauling is also a very misunderstood business. This business has never been regulated, or required to be licensed. Unlike the average business, the “official licenses” pumping companies claim to have are in fact self created and not issued by any governing bodies. Permits are given to pumping companies only by treatment facilities if the pumping company chooses to have their waste disposed of but there is no guarantee the company would ever use it, meaning this is a very lucrative business.

The illegal disposal of restaurant grease is a significant statewide problem causing damage to publicly owned sewage treatment facilities, lifts stations, collection systems, and creates expensive sewer back-ups and storm drain damage often resulting in water pollution.

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Food servicing facilities and their local wastewater departments are at the mercy of the pumping companies to do what they were hired for. Most of the personnel in the restaurant business really do not understand the full scope of the pumping industry and its responsibilities to the restaurants they work at. Businesses contracting pumping companies for waste grease services expect the company to properly and completely remove and dispose of the waste through sewage treatment plants, rendering plants or recycling facilities and are likely unaware of the alleged unlawful disposals and bad business practices that many pumping companies are guilty of.

The State of Colorado recently passed a bill (HB 10-1125) to regulate grease haulers. The few people who know of this House Bill are under the impression that this is the answer to our problem with illegal grease hauling. What you do not know is that the companies who pushed and lobbied for the HB 10-1125 are in the Yellow Oil Business and as most of us well know; yellow oil has a value in the market. The complaint the yellow oil rendering companies have is that waste is being stolen and, rightfully so, want laws in place to control it.

Unfortunately, the HB 10-1125 has yellow and trap grease (Trap grease AKA, brown grease, gray water, grease trap or grease interceptor waste) as being the same and both fall under the same rule. Yellow oil rendering companies and grease trap/interceptor pumping are two very different industries. Yellow oil has value, grease trap/interceptor waste currently does not and because of the difference in these two industries the HB 10-1125 does not address the direct problem with the grease pumping business.



Al Garcia

US EPA Region 8, Water Program Office of
Pollution Prevention / State & Tribal Assistance

Since I started at EPA 2 1/2 years ago, I have promoted Region 8 local Pretreatment programs, including CIPCA to get involved in the rulemaking process that may impact their local programs. Recently, I was asked by a local Pretreatment coordinator how Pretreatment programs can get involved. There are many ways to get involved in the rulemaking process, as a stakeholder, but first, it is important to understand how rules, regulations, and guidance are developed and how these are implemented in permits.

Foundation for Law Making

Note: This is a companion article for the training I provided at the CIPCA Spring Conference held on June 10 at the NETI facility in Lakewood. The presentation is posted on the CIPCA website. Before I talk about the Rules promulgated by EPA, let's start from the beginning. The foundation and source of the legal authority underlying the existence of the United States of America and the Federal Government of the United States resides in the Constitution drafted by our founding fathers in 1787. The Constitution also establishes the 3 branches of government, (legislative, executive, and judicial branches) and provides the framework for the relationship of the Federal Government to the states, to citizens, and to all people within the United States. The Environmental Statutes or laws such as the Clean Water Act were established by the legislative (Congress composed of the House of Representative and Senate) and Executive (White House) branches of the US government. However, the judicial branch can and has developed interpretations of the Clean Water Act. This provides a balance and ensures that no governmental branch can be the dominant form of rulemaking.

The EPA is the administering agency for the Clean Water Act and other environmental laws such as the Safe Drinking Water Act, Clean Air Act, etc. and is called a regulatory agency because Congress authorizes EPA to write regulations that explain the critical details necessary to implement the Clean Water Act.

Rulemaking

EPA develops regulations that implement the Clean Water Act for a variety of programs such as: NPDES, Water Quality Standards, Biosolids, Stormwater, Pretreatment, and Analytical Test Methods. EPA is responsible for developing sound, scientifically defensible standards, criteria, guidelines and limitations under the Clean Water Act.

Effluent Limitation Guidelines (ELGs) are national standards for wastewater discharges to surface waters (direct dischargers) and publicly owned treatment works (indirect dischargers). EPA issue ELGs for categories of existing sources and new sources under Title III of the Clean Water Act. The standards are technology-based (based on the performance of treatment and control technologies). The ELGs for direct dischargers are implemented in NPDES permits. The ELGs for indirect dischargers are called Pretreatment or Categorical Standards and are issued for new sources (PSNS) or for existing sources (PSES). The new source date is specific to the categorical standard.

EPA develops these ELGs for sectors that are unregulated and reviews existing guidelines (such as metal finishing) on a 2 year cycle. Each 2 year plan is published in the Federal Register for public input. The proposed plan and call for data, inspection reports and other relevant data for unregulated IUs and to update existing regulations is typically published in September or early fall in the even numbered year. The proposed 2010 ELG should be published this fall. The ELG development process calls for public input during the many phases of rulemaking and involves publication in the Federal Register all the way up to Final Rulemaking. The EPA ELG website will provide you further information on the ELG development process; regulations currently under development; information including guidance manuals for existing regulations, and provides information on how to participate and provide input in the process:

<http://www.epa.gov/waterscience/guide/industry.html>

News from the EPA (Continued)

Regulation Implementation

As discussed previously, these ELGs are implemented into permits, either at the local level in Pretreatment permits for Categorical Industrial Users (Pretreatment Standards) or in NPDES permits. Your NPDES permit issued by the Colorado Department of Public Health and Environment (CDPHE) may have a significant impact on your local Pretreatment program. CDPHE issues permits that are intended to protect water quality standards for your receiving stream and applicable biosolids limitations. These permit limits will drive your development of local limits, should the permit limits or water quality standards change. CDPHE is also involved with rulemaking and policy making that could impact your local program. It is a good idea for CIPCA and local programs to be aware of changes to water quality standards, or updates to rules and policies. The CDPHE regulations can be found at the following:

<http://www.cdphe.state.co.us/regulations/wqccregs/>

Water Quality standards for your receiving stream can be found in Regs 31 – 39. The permitting and control rules can be found in Regs 61 – 65. The Pretreatment regulations for CDPHE are Regulation 63.

The Rulemaking procedures and information by the Water Quality Control Commission can be found at the following:

<http://www.cdphe.state.co.us/op/wqcc/index.html>

The NPDES permits public notice by CDPHE for a 30-day comment period can be found at the following:

<http://www.cdphe.state.co.us/wq/PermitsUnit/PUBLICNOTICE/publiccommentnewpage.html>

A link to the Colorado Water Quality Forum, which provides significant input to CDPHE for policy making can be found at the following:

<http://www.cwqf.org/Workgroups/Workgroup.htm>

This is just a start of links to identify new rulemaking at the Federal and State Level and how to participate. I intend to continue to foster and promote public participation in the rulemaking processes. If you want to discuss this further, please contact me at 303.312.6382 or garcia.al@epa.gov

The minutes from the general membership meeting can be found online at CIPCA.org

“When you put your hand in a flowing stream, you touch the last that has gone before and the first of what is still to come”
- Leonardo da Vinci



C I P C A

COLORADO INDUSTRIAL PRETREATMENT COORDINATORS ASSOCIATION

Striving to make the environment a cleaner, safer place for today's and future generations.

A Very Special Thank You to the Following:

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CIPCA Chair, Centennial Water and Sanitation District

Al Garcia

US EPA Region 8, Water Program Office of Pollution Prevention /
State & Tribal Assistance

Gerry Fitzgibbons

City of Fort Collins Industrial Pre-Treatment Specialist

Rich Kowalis

Allstate Pumping and Consulting, LLC President

Without your contributions we would have no Newsletter!

EXTRAS!!

Please remember to make note that there is a Colorado Environmental Crimes Task Force meeting that will be held on July 8, 2010 from 1:30 – 4:30pm at the NETI facility located at 12345 W. Alameda Parkway Ste. 111 Lakewood, CO 80228.

Topics will include information on first responders and how you can help recognize and provide evidence and testimony in hazardous substances cases. A presentation will be given by John Olaechea of OSHA on workplace hazards, and a discussion on the EPA-CID Denver/AG Waste Hauler Initiative will take place.

If you cannot make it to NETI you can register for the webinar by clicking the link below:

<https://www1.gotomeeting.com/register/624800985>

Help Your Editor!!

Now is the time for improving the CIPCA Newsletter to better suit the needs of our general membership.

Would you like to see a classifieds section? You could post Pretreatment jobs to a pretreatment audience!

All Ideas are welcomed!
All Entries are encouraged!

Please submit articles, without content there is no newsletter and we are always willing to showcase new work!

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Upcoming CIPCA Events

Look for a special General Membership event in August, more details will be released as they become available.

CIPCA is planning the Fall Conference that will be scheduled for September 30, 2010 at the Double Tree Hotel in Westminster Colorado. More information about this conference will be released through e-mail and will be posted online at <http://cipca.org/index.php?loc=home>.

Corrections

In the previous Issue of the CIPCA Monitor, Region 8 Pretreatment Association President Dave Louch was incorrectly listed as working for the City of Littleton/Englewood. Dave currently works for the Plum Creek Wastewater Authority in Colorado.