

**Racine Water and
Wastewater Utilities**

Keith E. Haas, P.E.
General Manager



Michael L. Gitter, P.E.
Chief of Operations
Kenneth M. Scolaro, C.P.A.
Administrative Manager
Chad W. Regalia, P.E.
Chief Engineer

To: Adam Freihoefer, Wisconsin Department of Natural Resources

From: Keith Haas, Racine Water and Wastewater Utility

Date: April 2, 2018

Re: Racine Industrial Pretreatment Program

Per your request, this memo summarizes the Racine Wastewater Utility's pretreatment program. The Racine Wastewater Utility staff is proud of the effort it makes to control the discharge of pollutants into the sewer system. Our goal is to reduce our environmental footprint and improve our local environment.

Legal Basis of the Pretreatment Program

The Wisconsin Department of Natural Resources (DNR) Pretreatment Program is a requirement of the federal Clean Water Act law outlined in the Code of Federal Regulations 40. The term "industrial pretreatment discharger" refers to facilities that do not discharge their wastewater directly to the waters of the state. Instead, the industrial discharge flows into a municipal sewage treatment plant and mixes with other sewage for treatment before it is discharged to the waters of the state. The US Environmental Protection Agency has designated the State of Wisconsin DNR to administer this federal code within the state. In response to this designation, the State adopted Administrative Code chapters NR 211 and NR 220 through 297 to describe requirements for pretreatment discharges.

The State of Wisconsin has delegated the Racine Wastewater Utility to act as the local control authority for permitting industries that discharge to the Racine Wastewater Utility. Sections 98-150 through 98-156 of the Racine Municipal Code implement the requirements for Racine's pretreatment program. The Wisconsin DNR audits Racine's pretreatment program every two years, most recently in January 2018.

Permit Requirements

The Racine Wastewater Utility issues permits to industrial pretreatment dischargers. The permits require industrial users to abide by federal, state, and local requirements. Permits expire after four years, and the Racine Wastewater Utility may modify them as needed before expiration. The discharge limitations are grouped by categories of industrial and commercial dischargers. Some industries have discharge limitations based upon local discharge limits found in the Racine Municipal Code. The Industrial Wastewater Discharge Permit outlines and references the requirements necessary to comply with all applicable wastewater regulations.

Industrial users are monitored to control the pollutants discharged into the sewer system and into the treatment facility. The Racine Wastewater Utility tracks compliance and performs sampling, inspections and, if necessary, enforcement. Industrial users pay the cost of sampling and inspections. Racine samples some industries twice per year. It samples other, larger complexes every day of the year. Racine Wastewater Utility staff inspect each industrial user's facility annually. Inspections include pretreatment systems and operations that discharge process water. The Racine Wastewater Utility reports a summary of pretreatment activities to the Wisconsin DNR twice annually.

Permit Applications

The discharge permit process starts by the applicant applying for a discharge permit. Industrial users must apply for a permit at least 90 days before connecting to the wastewater system. Racine pretreatment staff reviews the application and works with the applicant to gather additional information. Pretreatment staff reviews process blueprints and visits the site to ensure permit compliance. Sampling and testing commences once the facility starts operations.

Violations and Enforcement

Currently, 40 local industries have permits through the Racine pretreatment discharge permit process. Failure to comply with the permitted discharge results in notices of non-compliance or notices of violation. The Racine Wastewater Utility follows up on violations by adding sampling and testing requirements. The violator pays the additional cost of the new requirements. Continued non-compliance requires the local Board of Standards to convene to review the discharge permit and the violations. The permittee appears before the Board of Standards to present a plan for returning to compliance. The Board can issue fines and penalties or cancel the discharge permit for failure to take proper steps to gain compliance. Industries strive to resolve their issues prior to the meeting of the Board of Standards as removal of their discharge permit will close the business or require them to haul their waste offsite at considerable expense. The attached Enforcement Response Plan spells out the Racine Wastewater Utility's process for detecting noncompliance and using appropriate enforcement actions to return a permittee to compliance.