

Executive Summary

The United States Environmental Protection Agency (EPA) regulates compliance with the Clean Water Act (CWA), including Section 307(b) pretreatment standards. As part of this function, EPA issues National Pollutant Discharge Elimination System (NPDES) permits to publicly owned treatment works (POTWs). These permits contain provisions that require compliance with Title 40 of the *Code of Federal Regulations* Parts 403 through 471 (40 CFR 403–471) to ensure compliance with pretreatment standards by significant sources introducing pollutants subject to such standards to the POTW (cf, CWA 402(b)(8), 33 U.S.C. § 1342(b)(8) *et seq.*). Requirements to develop Technically Based Local Limits (TBLLs) are specified at 40 CFR 403.5 (c).

This TBLL evaluation has been prepared to meet NPDES requirements for the Camas Wastewater Treatment Plant (WWTP). These limits have been developed in accordance with EPA's Technical Support Document *Local Limits Development Guidance* (EPA, 2004) and in accordance with Section S6, Part F. of NPDES Permit No. WA-0020249. In response to these standards, conditions, and requirements, the local limits in Table ES-1 have been developed for the Camas WWTP.

The limits in this document are developed to be applied to the point the industries discharge into the City of Camas' collection system. The limits are protective of the Camas wastewater system, prevent treatment interference, protect the environment, and protect worker health and safety. The assumptions for fluoride are conservative and the data used to derive the fluoride limits apply to Camas only and are not intended to set standards for local limits developed for other jurisdictions.

Table ES-1. Local Limits Summary

Pollutant	City-wide Local Limit	Karcher ^a	Section
Antimony	1.62 mg/L	Same as City-Wide	^a
Arsenic	0.14 mg/L	Same as City-Wide	^a
Cadmium	0.025 mg/L	0.11 mg/L	^a
Chromium (Total)	5.0 mg/L	5.0 mg/L	5.5
Chromium (Hexavalent)	No Limit Adopted	Same as City-Wide	4.1
Copper	0.438 mg/L	3.38 mg/L	^a
Cyanide	0.116 mg/L	1.20 mg/L	^a
Fluoride-Concentration	30.62 mg/L	Same as City-Wide	5.6.5
Fluoride-Mass			
Analog Devices	76.6 lb/d	NA	5.6.5
WaferTech	140.5 lb/d	NA	5.6.5
Lead	0.135 mg/L	1.20 mg/L	^a
Mercury	0.007 mg/L	Same as City-Wide	^a
Molybdenum	0.286 mg/L	Same as City-Wide	^a
Nickel	0.461 mg/L	3.98 mg/L	^a
NWTPH-Dx	No Limit Adopted	Same as City-Wide	4.1
NWTPH-Gx	No Limit Adopted	Same as City-Wide	4.1
Selenium	0.31 mg/L	Same as City-Wide	^a
Silver	0.304 mg/L	0.43 mg/L	^a
Sulfate	No Additional Limit Adopted	Same as City-Wide	5.7
TDS	No Additional Limit Adopted	Same as City-Wide	5.8
Zinc	0.403 mg/L	2.61 mg/L	^a
Flow	No Limit Adopted	Same as City-Wide	6.1

Table ES-1. Local Limits Summary

Pollutant	City-wide Local Limit	Karcher ^a	Section
BOD ₅	No Limit Adopted	Same as City-Wide	6.2
TSS	No Limit Adopted	Same as City-Wide	6.2
pH	5.5–11.0 SU	Same as City-Wide	6.4
Ammonia	No Limit Adopted	Same as City-Wide	6.3
Oils and Grease	100 mg/L total O&G	Same as City-Wide	6.5
Temperature	40°C (104°F) at POTW; 60°C (140°F) at discharge point from SIU	Same as City-Wide	6.6
Flammability	Specified as no material with a closed cup flashpoint <140 (°F) AND No two consecutive readings at ≥5% LEL, and no reading of ≥10% LEL allowed	Same as City-Wide	6.7

Local Limits shall apply to all users except as delineated for Karcher North America in this column

^a See Appendix C, Local Limits Calc Page 2.

Notes:

BOD₅ = 5-day biochemical oxygen demand

lb/d = pounds per day

LEL = lower explosive limit

mg/L = milligrams per liter

POTW = publicly owned treatment works

SIU = significant industrial user

SU = standard units

TDS = total dissolved solids

TSS = total suspended solids