



Lessons Learned Local Limits

Things that have come up

- Not every POC is the same
 - Same flow
 - Same safety/growth
- What does my neighbor do
 - Local Limit
 - Metal finishing
- TTO

Safety Factory

- Life of the POTW
- Factors
 - Uncontrolled sources
 - Hauled waste
 - Growth allowance (most use 15%)
 - Should vary data
 - POTW choice based
 - Safety factor (recommended 10% by EPA)
 - Should vary based on growth and data (See EPA Local Limit Guidance Manual (LLGM) 6.2.3)
 - POTW choice based
- Justification

Flow for POC

- Same flow
- Vary flow
 - Must have
 - Data and justification
 - Controlled sources
 - Uncontrolled sources

Different Things

- No allocations for current users
- Not have a information completed
- Using 40 CFR 261.24
 - Justified with prohibited standard
 - No user shall introduce toxic pollutants into the POTW
 - Chromium 40 mg/L 5 mg/L
 - Selenium 1.5 mg/L 1.0 mg/L
- Table comparing old with new limits

