

W-97-14  
Ms. Marta Jordan  
Engineering and Analysis Division (4303)  
U.S. EPA  
401 M. St. SW  
Washington, DC 20460

March 17, 1998

**Ref: Comments for Proposed Effluent Limitations Guidelines and Pretreatment Standards For the Industrial Laundries Point Source Category ( FR 62, N0. 242, December 17, 1997)**

Dear Ms. Jordan,

The following are Ohio EPA's comments on the above referenced proposed rule.

**Issue 1: Exclusion of Less Than 1 Million Pounds of Industrial Laundry and 255,000 Pounds of Shop and/or Printer Towels/Rags Per Calendar Year**

**Comment:** Ohio EPA is unclear as to the justification for the cutoff numbers that was used for this exclusion. Ohio EPA seeks further clarification regarding the basis for selecting these cutoff numbers especially with respect to environmental concerns. Ohio EPA suggests U. S. EPA to further look into whether this exclusion may potentially create interference or pass-through problems to smaller POTWs (e.g. POTWs with average flow of less than 1 mgd). Ohio EPA is particularly concerned because U.S. EPA found that 80% of the pollutant load from the industrial laundry category comes from shop/printer towels and rags and no environmental justification for these cutoff numbers were proposed in the regulation.

**Issue 2 : Evaluation of Molybdenum as a Limiting Parameter in Addition to Copper, Lead & Zinc.**

**Comment:** Ohio EPA is concerned that Molybdenum was excluded from the proposed limitations. It appears that U.S. EPA excluded Molybdenum based on consideration that it did not pass-through the POTW. However, Molybdenum is a 503 sludge regulated parameter and has potential to cause interference to land application of sludge. It appears from the technical support document that the selected chemical precipitation technology has a low removal efficiency for Molybdenum (about 22%). Ohio EPA believes that certain industrial laundry wastewaters (e.g., drawing oils from industrial uniforms/rags etc.) may contain significant Molybdenum concentrations which may interfere with POTW sludge disposal practices. Ohio EPA strongly suggests further evaluation of the selected BAT technology for a possible limitation for Molybdenum.

**Issue 3: Considering DAF as a BAT Technology for Existing Sources Instead of Chemical Precipitation**

**Comment:** Many industrial facilities in Ohio have already installed dissolved air flotation (DAF) units as a treatment technology. Since these facilities are mostly meeting the local limits, Ohio EPA believes that it is inappropriate to force these facilities to go through costly retrofit of their existing treatment systems. Ohio EPA strongly supports selection of a BAT technology option which requires existing facilities with DAF technology to comply with the standards based on DAF(with a possible phaseout after 10 years) and all other facilities comply with standards based on chemical precipitation (CP). Ohio EPA also suggests that U.S. EPA expand its monitoring database for both DAF & CP technology and look at these technologies in conjunction with pollution prevention practices.

**Issue 4: Re-evaluate TPH Limits for the Proposed Regulation**

**Comment:** Ohio EPA believes that it may be difficult for some industries to meet the proposed TPH limit of 27.5 mg/L

because of the presence of detergents in the wastewater which may give false positives in TPH analysis. In Ohio, most industrial laundries are currently meeting a local limit between 50 mg/L to 200 mg/L without significant problems in pass-through or interference. Ohio EPA suggests to re-evaluate the proposed TPH limit by considering the interference of detergents in TPH analysis. Ohio EPA also suggests to broaden the scope of industrial laundry wastewaters for this re-evaluation.

**Issue 5: Consideration of Oil and Grease Interference in the Chemical Precipitation Technology.**

**Comment:** It is Ohio EPA's experience that floating oil and grease may sometimes pose interference to optimum precipitation of metals and other toxics and non-conventionals. Ohio EPA suggests that U.S. EPA broaden the scope of monitoring industrial laundry wastewaters so that these interferences can be taken into consideration in developing the BAT pretreatment standard.

**Issue 6: Need for Limiting Selected Volatile & Semi-Volatile Organic Compounds**

**Comment:** Ohio EPA believes that five volatile organic compounds selected for regulation will either volatilize significantly in the sewer lines or in the aeration tank of POTW biological treatment system. Hence, these compounds have little potential of pass-through in the POTW effluent. Ohio EPA questions selection of these compounds due to pass-through criteria for volatility ( U.S. EPA considered any organic compound to pass-through which has Henry's Constant greater than  $2.4 \times 10^{-5}$  atm  $\cdot$  m<sup>3</sup>/mol ). Also, biological inhibition levels for these compounds are generally higher than what is typically found in the industrial laundry wastewaters. Ohio EPA does not feel that there is a need for limiting these individual volatile organic parameters. Ohio EPA believes that if there is a specific concern for sewer explosion or worker health and safety due to these volatile compounds, those issues can be effectively handled through general pretreatment prohibitions on a case by case basis.

**Issue 7 : Include Reference to Method 1664 in the Pretreatment Standards**

**Comment:** Ohio EPA suggests including reference to Method 1664 for the measurement of SGT-HEM in Table 1, Part 441 of the proposed pretreatment standards. Ohio EPA believes this reference will make the regulations more user friendly.

Ohio EPA appreciates this opportunity to comment. If you have any questions concerning the above comments, please call Mohammed Islam at (614) 644-2018.

Sincerely,

/ signed March 17, 1998 /

John Sadzewicz  
Acting Deputy Director of Water Programs

cc: George Elmaraghy, Assistant Chief, DSW  
Paul Novak, WRM Section Manager, DSW  
Jenny Leshnock, Supervisor, Public Permits & Pretreatment Unit, DSW  
Mark Stump, DSW  
Mohammed Islam, DSW  
Matt Walbridge, DSW, SWDO  
Marianne Piekutowski, DSW, SWDO  
Donna Kniss, DSW, NEDO  
Vera Coutant, DSW, CDO  
Elizabeth Wick, DSW, NWDO  
Fred Snell, DSW, SEDO

Matt Gluckman, Pretreatment Program Manager, U.S. EPA Region V