

reduction practices or equipment reduces the volume of water that must be treated before it can be considered a P2 allowable discharge. Reduced volumes require smaller treatment systems that, therefore, cost less to install and operate and run more efficiently, and in using certain technologies, such as precipitation/clarification, will result in reduced effluent pollutant loadings. Some facilities may adopt flow reduction strategies to save money and incidentally save loadings.

EPA believes that the definition of P2 allowable discharge can be implemented for this industry without the use of numerical limitations. In the pollution prevention alternative, EPA has included the requirement for paperwork that would include a discussion describing how a facility would demonstrate to their permitting authority (NPDES or pretreatment authority) that they are operating a well maintained treatment system (UTS or equivalent) that includes pollution control technologies that are appropriate for the PAIs handled at their facility. In addition, the paperwork would have to include the rationale for choosing the method of demonstration. For example, a facility may determine a surrogate method for determining breakthrough of their carbon adsorption unit. This method could be used instead of performing analytical testing for all or any of the PAIs that may have been in production at the facility over a specific period of time.

**Note:** EPA will submit an ICR to the Office of Management and Budget concerning this paperwork prior to final promulgation.

In addition, some indirect discharge facilities may be able to achieve complete pollution prevention, recycle and reuse of some wastewater sources, such as interior equipment cleaning rinsates, that would otherwise require treatment prior to being considered allowable discharges under the pollution prevention alternative. Such facilities would not have to incur the cost of treatment to discharge their remaining streams to the POTW (assuming no local limits requiring treatment). These facilities would not be operating treatment systems to comply with this regulation and; therefore, would not need to include a discussion in the necessary paperwork that demonstrates they are operating a well maintained treatment system. However, these facilities should indicate in the necessary paperwork that the wastewater sources which remain and which they are discharging are not the wastewater sources that require

treatment under the pollution prevention alternative. In addition, there may also be facilities that choose to comply with the zero discharge track of the Zero/P2 Option. For example, these facilities may choose to recycle and reuse wastewaters to the best of their ability and contract haul remaining wastewaters to avoid incurring the costs associated with installing and operating a treatment system.

### *3. Description of Pollution Prevention Practices*

EPA has developed a list of pollution prevention, recycle and reuse practices for the pollution prevention alternative. The list is derived from the pollution prevention, recycle and reuse practices that have been demonstrated in the PFPR industry and are documented in the public record to the proposed rule. (See Section 7 of the Technical Development Document for the proposed rule [EPA 821-R-94-002].) If performed, these practices will reduce the pollutant loading of the wastewater and reduce the volume of wastewater by creating opportunities for reuse. In some instances the water conservation aspect of the practices will discourage the practice of dilution of the wastewater to create concentrations that appear to be at an allowable level.

For use as part of the pollution prevention alternative, the list has been separated into two tiers: (1) Practices that discharger must agree to comply with without any modification; and (2) other practices that discharger must agree to with acceptable justification. The second list has been set up to include possible modification based on comments received on the proposed rule or during meetings with industry. These modifications are discussed below. Both sets of pollution prevention, recycle, and reuse practices are included in Appendix B of this supplemental notice.

The list of pollution prevention practices for which no modification is provided includes: the use of flow reduction on hoses; the use of good housekeeping practices such as using drip pans and performing preventive maintenance; specific practices concerning the reuse of rinsate from rinsing drums that contain liquid PAI (or inerts) for formulation of water-based products; the sweeping of dry production areas prior to rinsing; and the use of recirculation (with periodic blowdown) when operating air pollution control wet scrubbers and continuous overflow DOT aerosol leak test baths. In addition, this list of pollution prevention practices includes a provision for some equipment

dedication that is contingent on the ability to reuse interior rinsates as discussed on the second list (See discussion below). In the version of the P2 alternative, where water conservation practices and equipment would only be included as guidance and not specified in the regulatory text, the list above would be modified. The use of flow reduction devices on hoses and the use of recirculating air pollution control scrubbers and DOT test baths would not be included in the regulatory text of the final regulation and would only be recommended. EPA solicits comment on the practices contained in Table B-1 of Appendix B and whether the water conservation practices and equipment discussed above should be used only in guidance.

The second list sets forth other pollution prevention, recycle and reuse practices that may be modified with acceptable justification. In Appendix B, acceptable justification for modifying an individual practice is described following the description of the practice itself. A modification, for purposes of the pollution prevention alternative, means that a facility would no longer have to perform a listed practice or that it would need to comply with the described alternative practice. However, the modification only applies to the specific practice from the second list for which the modification has been justified and to no other listed practices. Facilities would be required to discuss all modifications in the paperwork necessary for the pollution prevention alternative.

The pollution prevention, recycle and reuse practices on the second list include: practices concerning the reuse of rinsates from rinsing drums that contain liquid PAI (or inert) for formulation of solvent-based products; the use of low volume/high pressure rinsing equipment for rinsing PFPR equipment interiors when rinsing with water; the use of floor scrubbing machines or mops for cleaning floors in liquid production areas; the segregation of production equipment for water and solvent based production; and the storage of interior equipment rinsates for use in future formulation of the same or compatible product. Water conservation equipment such as low volume/high pressure rinsing equipment, floor scrubbing machines, and mops and buckets that do not directly reduce pollutant loadings to the wastewater and, therefore, may not be specified in the regulatory text of the final rule. Instead, they may be discussed as guidance.

Upon reviewing the comments to the proposed regulation and discussions