



# CT Brewer's Guild Wastewater Permitting

April 7, 2021 Don Gonyea, CT DEEP



## **Brewery Wastewater Issues**

- While limited in number, there have been problems at WPCFs that were attributed to brewery waste and wastewater. Aggravating factors can include:
  - Breweries that discharge to small WPCFs
    - Small WPCFs do not have capacity to assimilate slug loads
  - Breweries that discharge to larger WPCFs
    - Large WPCFs have a greater capacity to adapt to slug loads but coordination is vital and cost sharing is encouraged.



# **Brewery Wastewater Issues**

Breweries produce waste products that have the potential to harm sewage treatment plants if not managed properly. Similar concerns apply to cideries and distilleries.

- Background:
  - We generally assume normal sewage has a BOD of about 150 ppm and COD of 300 ppm.
  - Brewery wastewaters can be significantly higher.
  - Spent grains can have BOD/COD over 100,000 ppm.
  - Trub can have BOD/COD of over 250,000;
    - 1 gallon trub costs the same as 400 gallons of sewage to treat
  - Spent grains can cause clogs in the sewer and scum formation at the WPCF.



# **Brewery Wastewater Permits**

DEEP issues discharge permits with minimum requirements as required by state law.

- Before 10/31/20, General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater
- Now, Significant Industrial User (SIU) or Miscellaneous Industrial User (MIU) General Permits
- What changed?



# **Brewery Wastewater Permits**

DEEP has determined that brewery wastewater is eligible for either the Significant Industrial User (SIU) or Miscellaneous Industrial User (MIU) General Permits:

SIU General Permit will be required for any brewery that:

- Discharges greater than 25,000 gpd on any day, or
- Has a wastewater that makes up 5% or more of the average dry weather flow or organic loading of the receiving WPCF, or
- Has been determined by the commissioner to be an SIU.
- SIU General Permit requires registration with DEEP
- After being approved by all applicable POTW Authorities



# **Brewery Wastewater Permits**

MIU General Permit will be required for any brewery that discharges wastewater below these thresholds.

- MIU General Permit requires submittal of a Notification to all POTW Authorities.
- To prevent adverse impacts to the receiving POTW both MIU and SIU incorporate "general and specific prohibitions" consistent with federal law (40 CFR 403.5).
- Receiving POTWs may also be required develop local limits to address discharges that result in adverse impacts as required under 40 CFR 503.5.



# **Brewery Wastewater Management**

- Brewery wastewater is considered a subset of Food Processing wastewater.
- Wastewater management requirements from the MIU and SIU General Permits include:
  - Isolation for proper disposal of grains, hops and other solids,
  - Isolation of other high strength liquids like trub, yeast, waste fermentables or off-spec product,
  - Limiting the types of cleaners and disinfecting agents that can be used.



# **Brewery Wastewater Management**

DEEP regulations incorporated into the General Permits include:

- General water conservation practices,
- Prohibition of diluting the discharge with clean water to meet permit limits.
- DEEP will be evaluating the benefits and legal requirements of onsite wastewater disposal of brewery wastewater.
- Discharges from breweries without access to a city sewer can be authorized under the SIU or MIU General Permits to haul their wastewater to an approved WPCF for discharge to the WPCF's receiving facility.



# **Questions?** Contact Info

Wastewater permitting questions: <u>Donald.Gonyea@ct.gov</u>

Nutrient Management Plan questions (farm breweries) Joseph.Wetterman@ct.gov

Treatment plant questions <u>Rowland.Denny@ct.gov</u>



# CT Brewers Guild Meeting April 7, 2021

### Caren Harder Compliance Specialist



#### Sources of Organic Waste from Breweries

- Yeast
- Hops
- Trub
- Grains
- Off spec product



## **Options for Recycling of Organic Waste**

#### Anaerobic Digestors (AD):

- 2 permitted AD sites in CT, and others in MA and NY

#### Animal Feed

27 known sites in CT for accepting organics – beef, pig, poultry, goat and lamb

#### **Composting**

- 3 permitted sites in CT



### **Upcoming Waste Assistance to Breweries**

- Schedule follow up meeting for additional information and assistance
- On-site visits
- Assisting with organics diversion
- Implementing general recycling
- Help identify ways to reduce waste, reduce related costs and other trash related issues
- Provide information on disposal/reuse/recycling facilities and haulers



# **Questions?** Contact Info

#### <u>Caren.Harder@ct.gov</u>

# DEEP's Sustainable Materials Management Unit (860) 424-3277

