

Pretreatment Enforcement: Mississippi Commission on Environmental Quality and Laurel, Mississippi Facility Enter into Agreed Order



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The Mississippi Commission on Environmental Quality (“MCEQ”) and Howard Industries (“HI”) entered into a February 8th Agreed Order (“AO”) addressing alleged violations of a Clean Water Act pretreatment permit. See Order No. 6830 18.

The AO provides that HI operates a facility in Laurel, Mississippi, pursuant to a Pretreatment Permit (No. MSP090204).

MCEQ is stated to have informed HI of violations of the Pretreatment Permit pursuant to three letters sent in 2017. The violations allegedly included:

- Total Recoverable Cadmium pound per day monthly average limitation of 0.0015 lb/day for seven months
- Total Recoverable Cadmium daily maximum limitation of 0.0036 lb/day for six months
- Total Recoverable Cadmium milligram per liter monthly average limitation of 0.0014 mg/L for six months
- Total Recoverable Cadmium milligram per liter daily maximum limitation of 0.0035 mg/L for six months
- Oil and Grease pound per day daily maximum limitation of 200 lb/day for a single month

The AO assesses a civil penalty of \$25,000. Further, HI agrees to undertake an engineering study to evaluate the causes of the total recoverable cadmium exceedances at the facility’s wastewater treatment system and submit a copy of the final report to MCEQ. The engineering study’s recommendations must be implemented and documentation of completion submitted to MCEQ within 10 days of completion but no later than July 31, 2018.

[A copy of the AO can be found here.](#)