



Vermont's Pretreatment Program

Overview, Update & Discussion
about Pretreatment.



House Keeping

1. Sign-In
2. Breaks
3. Bathrooms
4. Exits
5. If you step outside – the front door locks when you close it.
6. Water
7. You may ask questions and comment during the presentation...within reason.
8. We will be recording this.

Introductions

1.Name

2.Occupation

3.Organization

Goals

Overarching Goals:

1. **Provide protection to POTWs and receiving waters;**
 2. **Effectively and consistently manage industrial discharges;**
 3. **Bring the Program into compliance with federal requirements;**
 4. **Improve the Program.**
-



Today:

1. **For you to have a basic understanding of the Pretreatment Program...**
2. **For you to think critically about Pretreatment, what it means to you, what you want from it.**
3. **For us to...**
 - a. Communicate the current status and our thoughts on Pretreatment
 - b. Obtain feedback on how you think Pretreatment can best be administered
 - c. Understand what you value, need, & want from Pretreatment
 - d. What Pretreatment support municipalities would be willing to give
 - e. What barriers would your municipality face taking on Pretreatment
4. **Use feedback from this discussion to make thoughtful, informed decisions about the Program**

What Do You Want Out of Pretreatment

Given these goals, please be thinking:

1. What is the ideal state of the Pretreatment Program?

- a. What do want from the Pretreatment Program?
- b. What does your POTW need from the Pretreatment Program?
- c. What expectations do you have of the Pretreatment Program?
- d. Is the Pretreatment Program meeting your POTW's needs?

2. What do you think can be/needs to be improved of the Pretreatment Program?

3. How can the Pretreatment Program be most effective?



Agenda

1. What is “Pretreatment”

- Overview
- Pretreatment Standards
- Pretreatment Program Implementation

2. Vermont’s Pretreatment Program

- How the Pretreatment Program Works in VT
- Permitted Universe
- Review of Approach

3. EPA Audit of VT Pretreatment Program

- Deficiencies
- Strategies to Correct Deficiencies
- Potential Changes to the Program
- Timeline

4. Discussion About the Pretreatment Program

5. Next Steps

Common Terms

| | |
|--|--|
| Control Authority: | Entity that directly regulates Industrial Users (State of VT or approved POTW). |
| Approval Authority: | Entity that oversees Control Authority (EPA or State of VT for approved POTWs) |
| Industrial User: | User that introduces non-domestic wastewater to a POTW (through either collection system connection or hauled waste). |
| Significant Industrial User (SIU): | Industrial User that satisfies criteria and requires a Pretreatment Permit. |
| Categorical Standards or Effluent Limit Guidelines: | Federal technology-based standards applicable to Industrial Users that utilized specific industrial processes. Standards and thresholds typically based on production. |
| Categorical Industrial User (CIU): | Industrial User subject to EPA's technology-based standards for specific industry sectors and requires a Pretreatment Permit. |
| Non-Significant Industrial User: | Industrial User deemed non-significant and does not <u>require</u> a Pretreatment Permit but is still subject to Pretreatment regulations. |
| Non-Domestic / Process / Industrial Wastewater: | Wastewater subject to Pretreatment regulations, deriving from an Industrial User. Does not include sanitary, noncontact cooling, and boiler blowdown wastewater. |
| Pretreater: | Industrial User subject to a Pretreatment Permit or Pretreatment regulations. |
| Publicly Owned Treatment Works (POTW): | Municipal WWTF that is not privately owned. All VT WWTFs. |
| Approved Program: | Approved POTW Pretreatment Program. Currently none in VT right now. |
| Non-Approved Program: | Local POTW regulation through Sewer Use Ordinance. |

Overview & Purpose



Overview

Pretreatment = regulatory requirements to control, reduce, and/or eliminate pollutants from non-domestic sources of wastewater.

Primary Goals of Pretreatment:

1. Prevent the introduction of pollutants to POTWs which will interfere, pass-through, and/or be incompatible;
2. Improve opportunities to recycle wastewaters and sludges;
3. Protect POTW workers.

*Key component of
DEC's mission to:
**Protect, Maintain, Enhance, &
Restore Vermont's water resources.***

Federal Pretreatment Standards

40 CFR 403: General Pretreatment Regulations

§403.5 – Prohibitions & Local Limits

§403.6 – Categorical Standards

§403.10 – State Pretreatment Program

§403.8 – POTW Pretreatment Program

General Prohibitions:

Forbid the discharge of any pollutant(s) to a POTW that can cause pass through or interference.

Specific Prohibitions

Specific limits to “enhance control of hazardous wastes entering POTWs” and protect POTWs, receiving waters, and workers.

Categorical Standards (Effluent Limit Guidelines)

Technology Based-Standards published in the Code of Federal Regulations which regulate pollutants from specific industrial sectors.

Criteria typically is based on production #s or raw material #s.

Local Limits

Technically-based Pretreatment Standards developed in accordance with 40 CFR 403.5(c) to implement General and Specific Prohibitions.

Pollutant-specific limits, narrative conditions, case-by-case discharge limits.

If numeric limits - they are technically-based, then allocated to users.

Federal Pretreatment Standards

Discharge standards, limits, and best-management practices applicable to Industrial Users.

| | General and Specific Prohibitions | Categorical Pretreatment Standards | Local Limits |
|---------|-----------------------------------|------------------------------------|---|
| All IUs | X | | May apply; depends on publicly owned treatment works (POTW) ordinance and permit provisions |
| SIUs | X | | Generally apply; may depend on allocation method |
| CIUs | X | X | Generally apply; may depend on allocation method |

General Prohibitions

Pass through

A discharge that:

- **Exits the POTW into surface waters** in quantities or concentrations that, alone or in conjunction with a discharge or discharges from other sources,
- **Cause of a violation of any requirement of the POTW's NPDES Permit.**

NPDES Permit Conditions

1. Effluent Limits;
2. Cannot exceed WQS;
3. Proper O&M.

Interference

A discharge, alone or in conjunction with discharge(s) from other source(s):

1. **Inhibits or disrupts the POTW; and**
 - **Treatment processes, operations, sludge processes, use, or disposal;**
2. **Is a cause of a violation of any requirement of the POTW's NPDES permit;**
 - Including an increase in the magnitude or duration.
3. **Or prevents sewage sludge use or disposal** in compliance with the statute, regulations, or permits.

Specific Prohibitions

1. **Fire or explosion hazard**
 - Closed cup flashpoint of $< 140^{\circ}\text{F}$ or 60°C
2. **Pollutants that cause corrosive structural damage**
 - Discharges with pH lower than 5.0 SU
3. **Solid or viscous pollutants** in amounts that causes interference (obstruction).
4. **Any pollutant released at a flow rate and/or pollutant concentration which will cause Interference with the POTW.**
5. **Heat** in amounts resulting in Interference:
 - In no case temp at the POTW treatment plant $> 40^{\circ}\text{C}$ (104°F).
6. **Petroleum oil, nonbiodegradable cutting oil, or mineral oil origin** that cause interference or pass through.
7. **Pollutants which cause toxic gases, vapors, or fumes** that may cause acute worker health and safety problems.
8. **Trucked or hauled pollutants, except at discharge points designated by the POTW.**



Categorical Standards

- Industry specific standards published in CFRs
- EPA develops through Effluent Limit Guidelines research.
- Direct and/or Pretreatment limitations associated with facilities that meet certain criteria.
 - Criteria typically is based on production or amount of raw material used.

In Vermont:

- Metal Finishing – 433
- Electroplating – 413
- Battery Manufacturing – 461

| ↕ Category Overview | ↕ 40 CFR | ↕ Initial | ↕ Last |
|---|---------------------|-----------|--------|
| Airport Deicing | 449 | 2012 | 2012 |
| Aluminum Forming | 467 | 1983 | 1988 |
| Asbestos Manufacturing | 427 | 1974 | 1975 |
| Battery Manufacturing | 461 | 1984 | 1986 |
| Canned and Preserved Fruits and Vegetable Processing | 407 | 1974 | 1976 |
| Canned and Preserved Seafood (Seafood Processing) | 408 | 1974 | 1975 |
| Carbon Black Manufacturing | 458 | 1976 | 1978 |
| Cement Manufacturing | 411 | 1974 | 1974 |
| Centralized Waste Treatment | 437 | 2000 | 2003 |
| Coal Mining | 434 | 1975 | 2002 |
| Coil Coating | 465 | 1982 | 1983 |

Local Limits

Site-specific limits to implement the General & Specific Prohibitions.

1. Prevent exceedance of NPDES permit limit or WQS;
2. Prevent exceedance of other NPDES permit condition (proper O&M);
3. Prevent interference with sludge disposal;
4. Protect worker health & safety.

Site-specific:

1. Numeric;
2. Narrative effluent discharge limits, BMPs.

LL's are required when:

1. POTW develops a Pretreatment Program;
2. Where pollutants from IUs might result in interference or pass through causing a violation.

LL's are required to be technically-based and reevaluated each NPDES permit renewal.

United States
Environmental Protection
Agency

Office of Wastewater
Management 4203

EPA 833-R-04-002A
July 2004



Local Limits Development Guidance

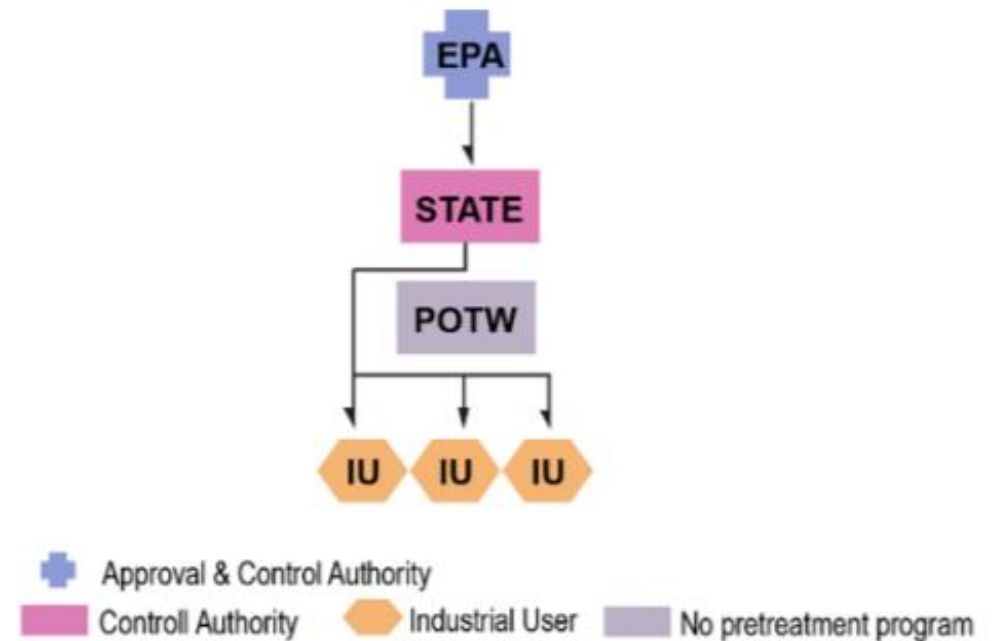
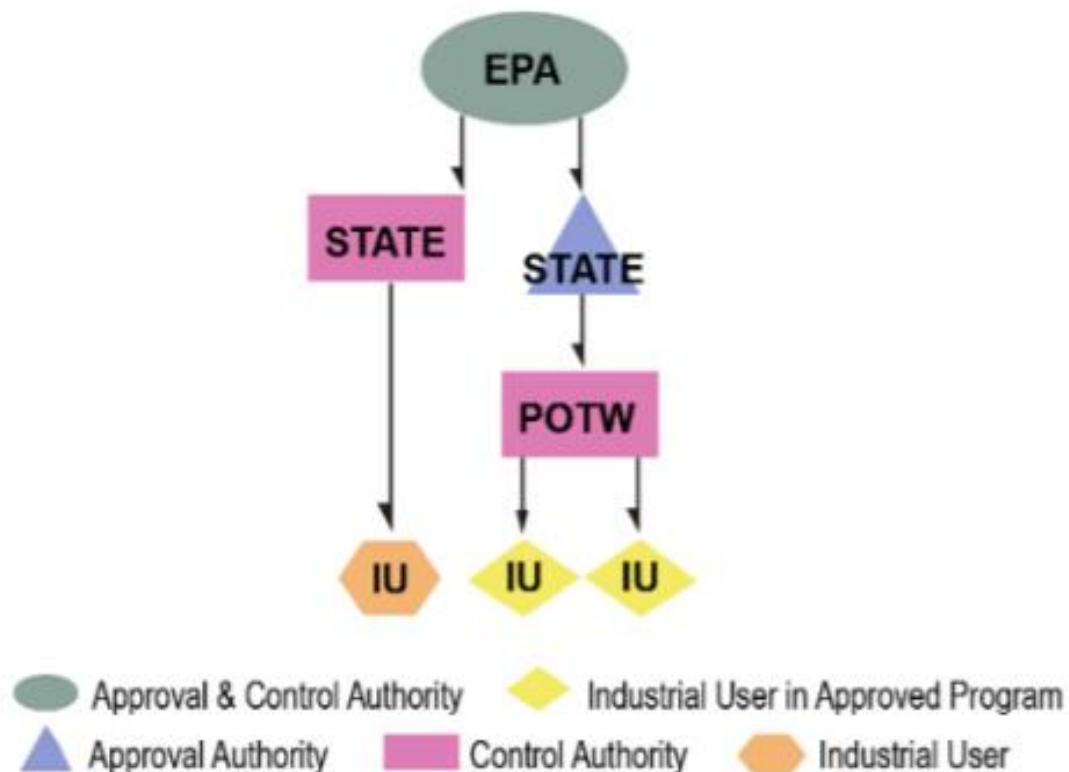
General Process for Technically Based Limits:

1. Determine Pollutants of Concern
2. Characterize WWTF Capacity, Pollutant Removal Efficiency, Domestic & Non-Domestic Loadings
3. Calculate Maximum Allowable Headworks Loading
4. Allocate LLs
5. Incorporate LLs in Permits

Implementation

Pretreatment Standards are implemented by the Control Authority on IUs through a Pretreatment Program.

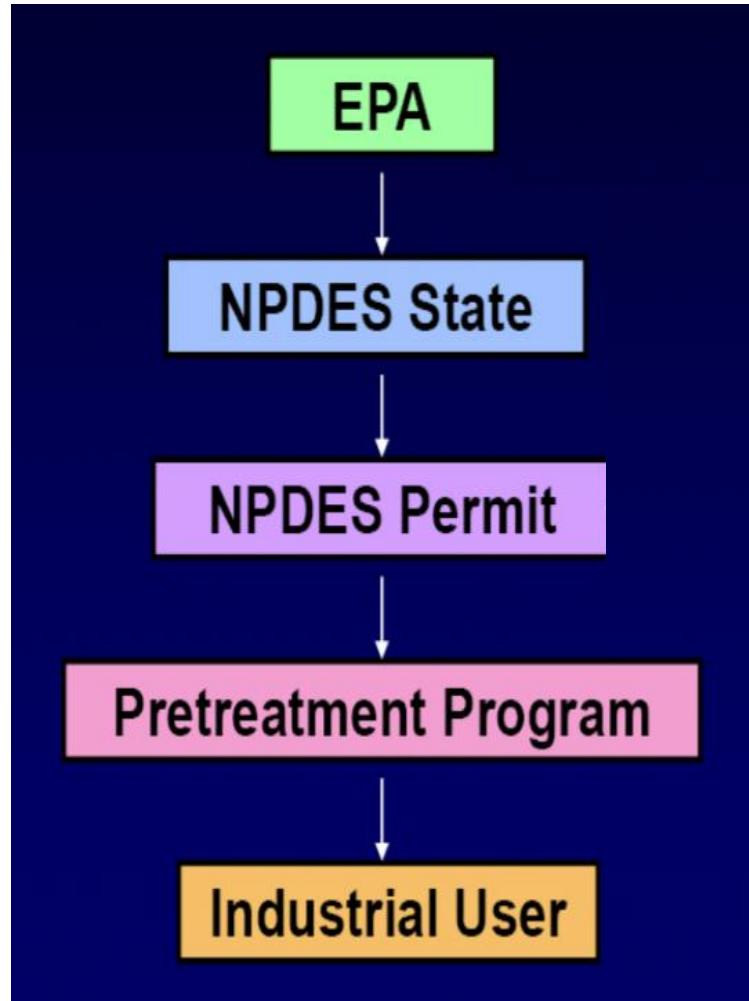
- Control Authority is overseen by the Approval Authority.



**States Assuming Direct Responsibility
Under 40 CFR 403.10(e)**

How it Works in Most States

The Requirement for POTW to implement a Program comes via NPDES Permit Conditions:



AGENCY OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WATERSHED MANAGEMENT DIVISION
ONE NATIONAL LIFE DRIVE, MAIN BUILDING, 2nd FLOOR
MONTPELIER, VT 05620-3522

Permit No.: 3-1207
PIN: BR81-0002
NPDES No.: VT0100196

Name of Applicant: City of Montpelier
39 Main Street
Montpelier, VT 05602

Expiration Date: September 30, 2022

DISCHARGE PERMIT

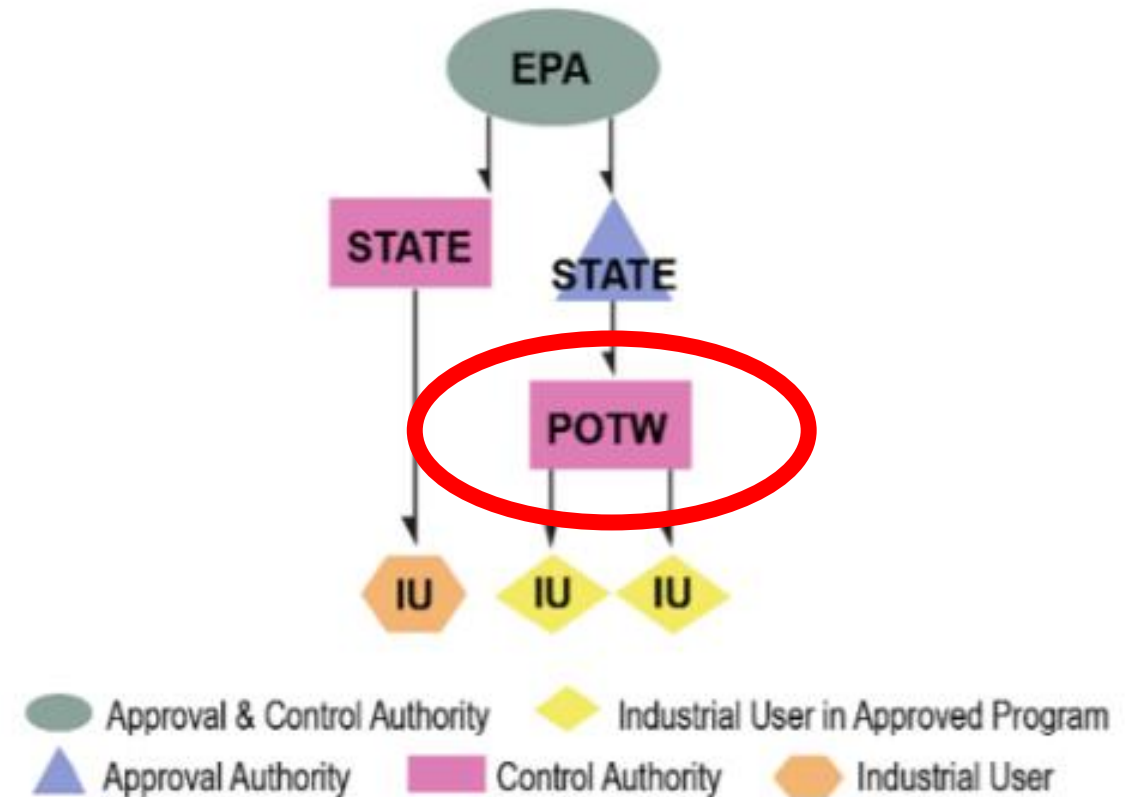
In compliance with the provisions of the Vermont Water Pollution Control Act as amended (10 V.S.A. Chapter 47), the Vermont Water Pollution Control Permit Regulations, as amended (Environmental Protection Rules, Chapter 13), and the federal Clean Water Act as amended (33 U.S.C. § 1251 *et seq.*) and implementing federal regulations, the City of Montpelier, Vermont (hereinafter referred to as the "Permittee") is authorized by the Secretary of the Agency of Natural Resources (Agency) to discharge from the Montpelier Wastewater Treatment Facility (WWTF) to the Winooski River in accordance with the following conditions.

This permit shall become effective on October 1, 2017.

Implementation – Control Authority (POTW)

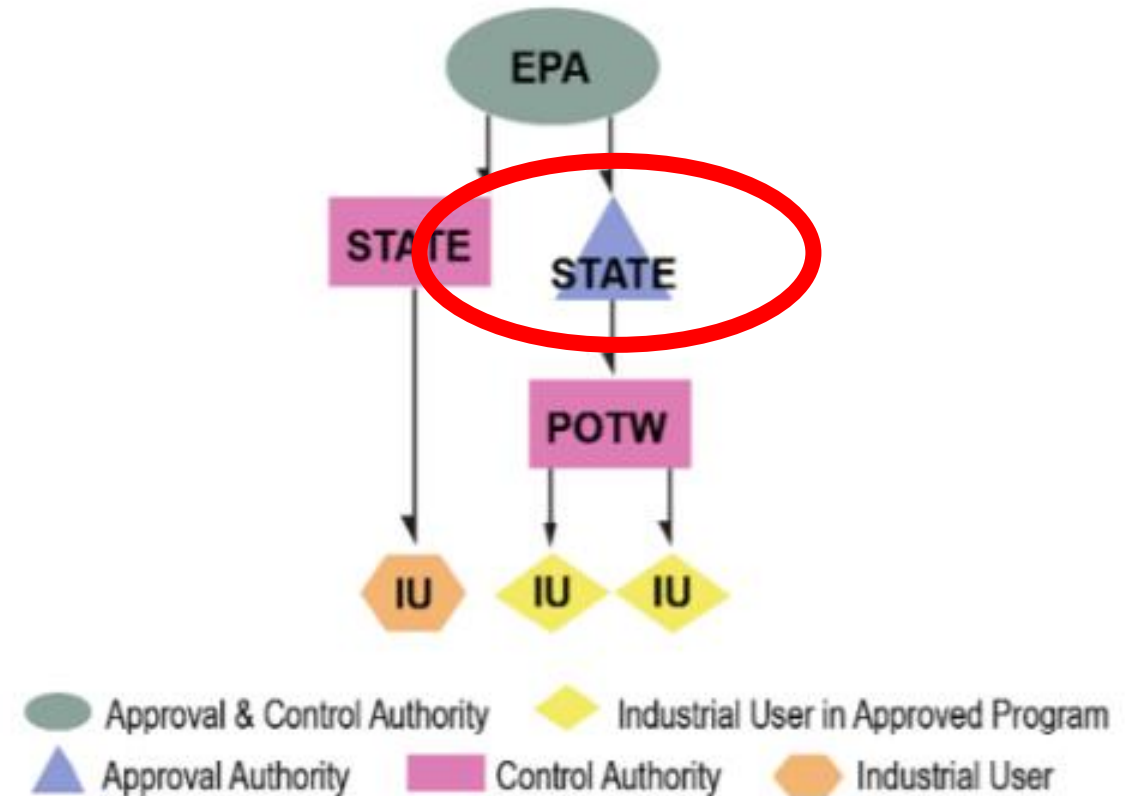
Major elements of a Program:

- 1) Legal Authority
- 2) Procedures
 - a. Identify and characterize IUs
 - b. Permits
 - c. Inspections
 - d. Sampling
- 3) Funding & Resources
- 4) Local Limits
- 5) Enforcement
- 6) Maintain and report list of SIUs



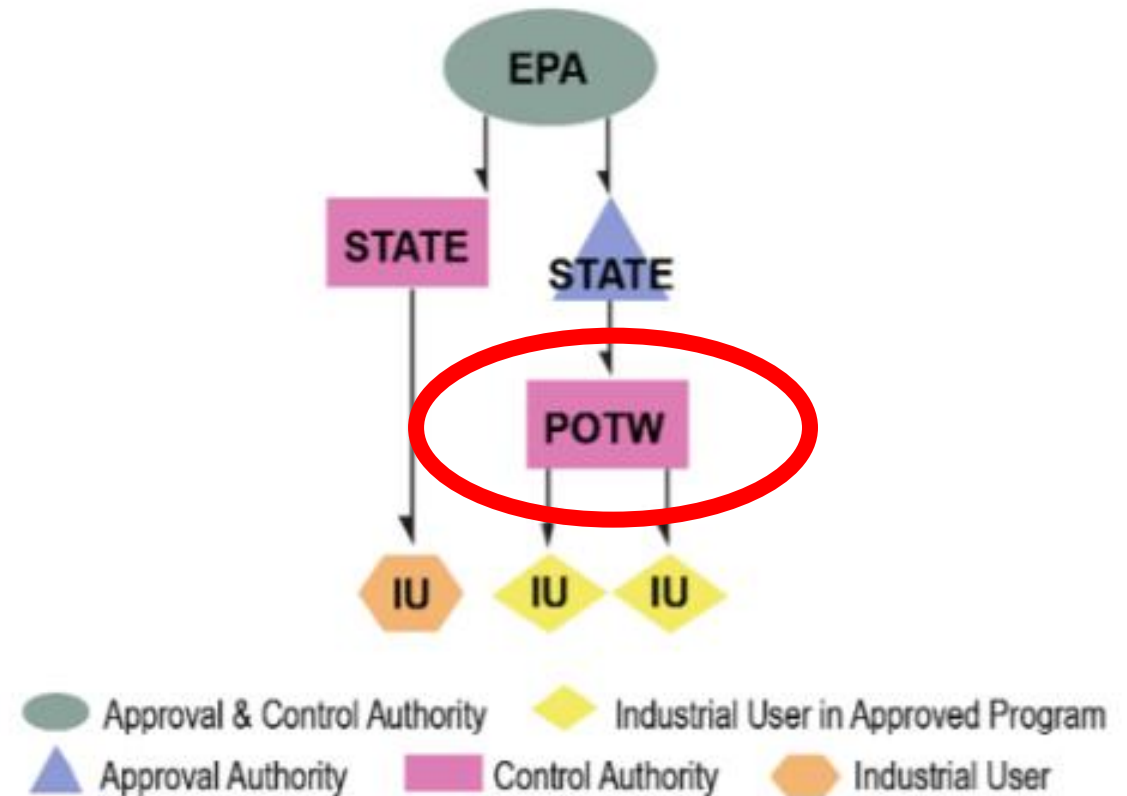
Implementation – Approval Authority (State)

- 1) Determine who needs a POTW Program;
- 2) Condition, approve, deny Program development;
- 3) Technical and legal assistance to Control Authorities;
- 4) Receive and review reports;
- 5) Compliance audits/inspections;
- 6) Enforcement against POTW or IUs;
- 7) Adequate funding/personnel to carry-out Program.



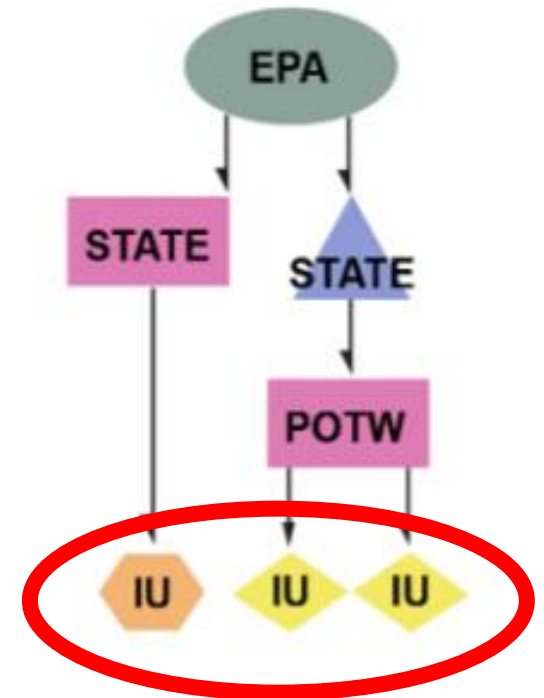
POTW's Required to Have a Program:

1. Combined design flow > 5 MGD; and
2. Receiving wastewater subject to Pretreatment Standards or interferes or passes-through.
3. POTW < 5 MGD to prevent pass-through and interference, considering:
 - a. Nature/volume of industrial wastewater;
 - b. Treatment process upsets;
 - c. Violations of effluent limits;
 - d. Contamination of sludge;
 - e. Other circumstances.



IUs Required to be Regulated:

1. All CIUs regardless of flow;
2. SIUs:
 - a. Discharge an average of 25,000 gpd of process wastewater;
 - b. Contribute 5% or more of design dry weather hydraulic capacity;
 - c. **Contribute 5% or more of design organic (i.e., BOD) capacity;**
 - d. **Determined to have “reasonable potential” to adversely affect POTW’s operation or violate pretreatment standards or requirements.**
3. Any other non-domestic user that discharges pollutants of concern.



Through Pretreatment Program...

*Key component of DEC's overarching mission to:
Protect, Maintain, Enhance, & Restore Vermont's water resources.*

1. Manage the amount of hydraulic and pollutant loading the WWTF receives

2. Protect:

- Capacity for residential and industrial growth
- “Overloading” or process upsets
- Exceeding State NPDES permit limits
- Municipal workers – safe working conditions
- Receiving Water Quality

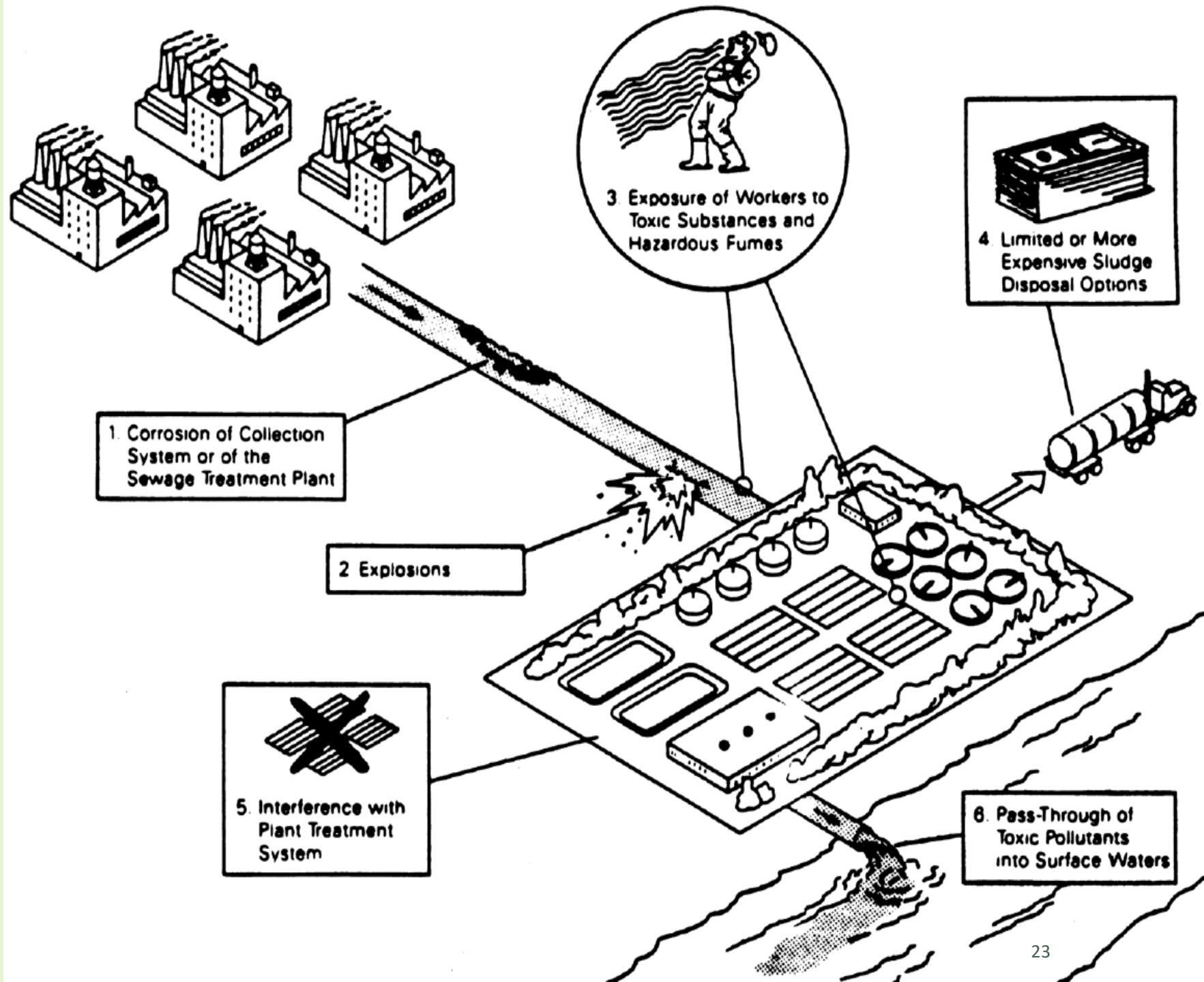
3. Prevent:

- Exceeding State NPDES permit limits
- Excessive solids accumulation in collection system
- Excessive wear and tear & high O&M costs
- Toxic pollutants to receiving waters
- Interference with sludge management (digestion, disposal)

4. Enable:

- Enable proper operation and management
- Sustainable management of utility
- Source reduction of toxics use
- Reduction of pollutants into receiving waters

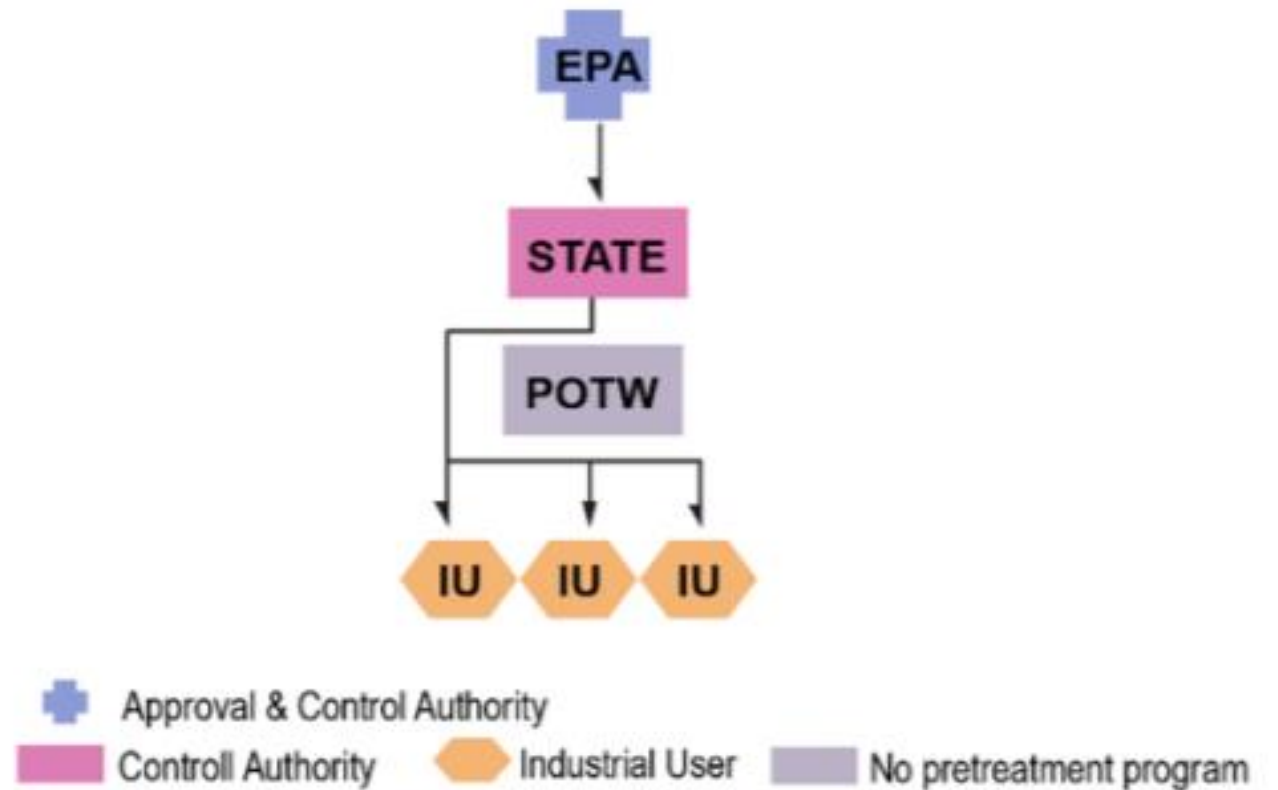
The State
Pretreatment
Program can
help with this...



Vermont Pretreatment Program

1 of 5...

Alabama, Connecticut,
Mississippi, Nebraska,
and **Vermont**



**States Assuming Direct Responsibility
Under 40 CFR 403.10(e)**

403.10e

§ 403.10(e) State Program in lieu of POTW Program.

“Notwithstanding the provision of § 403.8(a), a State may assume responsibility for implementing the POTW Pretreatment Program requirements set forth in § 403.8(f) in lieu of requiring the POTW to develop a Pretreatment Program.

This does not preclude POTW's from independently developing Pretreatment Programs.”

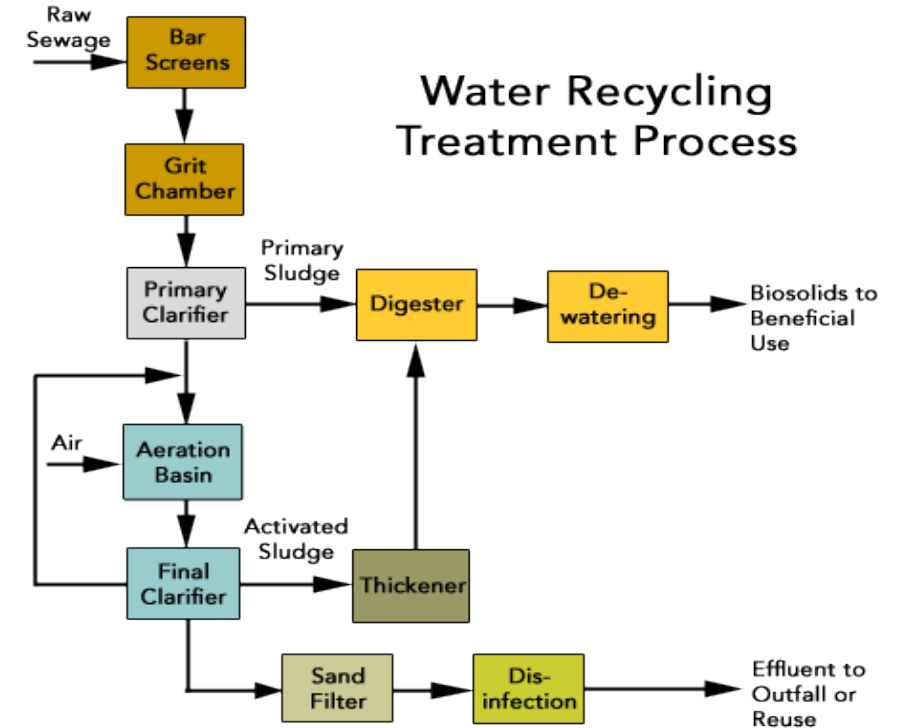
§ 403.8(f) POTW pretreatment requirements.

- 1) Legal Authority
- 2) Procedures
- 3) Funding & Resources
- 4) Local Limits
- 5) Enforcement Response
- 6) Maintain and report list of SIUs annually



Current Process:

1. Identify new/expanding IUs
 - POTW, Consultants, Regional Offices, Act 250, Environmental Assistance.
2. Permit Determination
 - Discharge characteristics, industrial processes, chemicals, treatment, P2.
3. Adopt allocations & Pretreatment Standards into permit
4. Compliance & Enforcement
5. Annual Inspections with Split Samples
6. Limited enforcement on “illicit discharges”
7. Rely on undefined local control



State Authority and Rules

Authority: **10 V.S.A. § 1263. Discharge permits**

(a) **Any person who intends to discharge into any POTW waste that:**

- interferes with,
- passes through without treatment,
- or is otherwise incompatible with that works
- or would have a substantial adverse effect on that works or on water quality

Shall make application to the Secretary for a discharge permit.

VERMONT WATER POLLUTION CONTROL PERMIT REGULATIONS

ADOPTED C. JANUARY 17, 1974 PURSUANT TO 10 V.S.A. § 1258(6)
FILED WITH SECRETARY OF STATE FEBRUARY 26, 1974

(c) Issue a permit containing terms and conditions as may be necessary to carry out the purposes of this chapter and of applicable federal law. Those terms and conditions may include:

- Specific effluent limitations and levels of treatment technology;
- Monitoring, recording, reporting standards;
- Entry and inspection authority for State and federal officials;
- Reporting of new pollutants and substantial changes in volume or character of discharges to waste treatment systems or waters of the State;
- **Pretreatment standards before discharge to waste treatment facilities** or waters of the State; and
- **Toxic effluent standards or prohibitions.**

| | |
|--|------------------|
| Energizer - Mini Alkaline | Bennington |
| Vishay Tansitor | Brattleboro |
| Commonwealth Dairy | |
| G S P Coatings Inc | |
| Grafton Village Cheese Co - Brattleboro | Burlington |
| Edlund Company | |
| Drews LLC | Chester |
| Newsbank Inc | |
| New England Waste Services - Coventry | Coventry |
| Green Mountain Spinnery | Putney |
| Franklin Foods Inc | Enosburg Falls |
| Agri-Mark - Middlebury | Middlebury |
| Otter Creek Brewing | |
| VT Hard Cider - Exchange St | |
| Casella Waste Mgmt Inc - multiple facilities | Montpelier |
| Moretown Landfill | Moretown |
| Lost Nation Brewery | Morrisville |
| Rock Art Brewery LLC | |
| Harpoon Brewery | Norwich |
| Randolph Landfill | Randolph |
| Stone Corral Brewery | Richmond |
| Deermont Corp - VT Plating | Rutland |
| General Electric - Columbian Ave | |
| General Electric - Windcrest Road | |
| STO Corporation | Rutland |
| Fiddlehead Brewing | Shelburne |
| Magic Hat Brewing | South Burlington |
| Precision Valley Finishing | Springfield |
| Springfield Landfill | |
| Ben & Jerry's St Albans | St Albans |
| St Albans Cooperative Creamery | |
| Alchemist - Stowe | Stowe |
| Trapp Lager Brewery | |
| Plumrose USA | Swanton |
| Swan Valley Cheese of VT | |
| VT Precision Tools | |
| Goodrich Corp Fuel Utility Systems | Vergennes |
| Alchemist - Waterbury | Waterbury |
| Ben & Jerry's Waterbury | |
| Chittenden Solid Waste District | Williston |

Permitted Universe

24 POTWs receiving wastewater from **permitted IUs**

1 POTW Program in-development

42 Permitted Industrial Users

31 Significant Industrial Users

- Annual Sampling / Inspections

~35 Determinations Per Year

~10 Known facilities that likely need permits

State Program vs. Municipal Program

State:

Benefits:

1. Offer technical, financial, and legal support to POTWs;
2. Implementing regulations, permitting, & inspections;
3. Enforcement;
4. State takes the heat from regulated community.

Challenges:

1. Identifying new and expanding IUs;
2. Impacts of collective discharges & “reasonable potential”;
3. Lengthy enforcement process;
4. Implementing Technically-Based Local Limits;
5. Proximity to Industrial Users;
6. Duplicative for Industrial Users;
7. Resources:
 - a. Maintain permit backlog;
 - b. Inspections/sampling;
 - c. Take on additional permittees;
 - d. Program development.

Municipal:

Benefits:

1. Familiarity with users, collection system, and wastewater treatment facility;
2. Proximity to Industrial Users.

Challenges:

1. Staffing & resources;
2. Writing permits;
3. Small Industrial User base in VT;
4. Municipality takes heat from regulated community.

2018 EPA Audit

Pretreatment Compliance Audit

Summary Report

Control Authority: Vermont Department of Environmental Conservation

Location: 1 National Life Drive, Main 2, Montpelier, VT 05620

Contacts: Mary Borg, Deputy Director
Jessica Bulova, Wastewater Program Manager
Liz Dickson, Environmental Analyst
Mari Cato, Environmental Technician
David DiDomenico, Environmental Analyst
Shea Miller, Environmental Analyst
Nick Giannetti, Environmental Analyst
Kathleen Parrish, Environmental Analyst
Amy Polaczyk, Environmental Analyst

Audit Dates: September 10–12, 2018

Audited By: Chuck Durham, PG Environmental (EPA HQ Contractor)
Sirese Jacobson, PG Environmental (EPA HQ Contractor)
Justin Pimpare, U.S. EPA Region 1

Major Findings



Permitting



Inspections



Sampling



Identification of Industrial Users



Local Limits



Enforcement



Staffing

Permitting

Permit Requirement: 40 CFR 403.8(f)(1)

(iii) Control through Permit, contribution by IU to ensure compliance with Pretreatment Standards and Requirements.

(iii)(B)(1) Permits may in no case be issued for more than 5 years

Notification Requirements: 40 CFR 403.8(f)(2)(vi), 40 CFR 403.17, 40 CFR 403.16, 403.12(j), and 403.8(f)(1)(iii)(B)(2)

Deficiencies:

1. 30% of permits are expired;
2. 30% of permits are administratively continued past the 5-year duration;
3. Permits need to be improved:
 - Slug control requirements;
 - Categorical standards documentation and analysis;
 - Technically based Local Limits;
 - Inadequate notification requirements.

Corrective Actions / Improvements:

1. Update permit template with required conditions;
 - *Completed.*
2. Renew expired permits and eliminate backlog.

Local Limits

Requirement: 40 CFR 403.8(f)(4); 403.5(c)

Develop Local Limits to implement general and specific prohibitions or demonstrate they aren't necessary.

Deficiencies:

1. Failure to evaluate POTWs for need to develop LLs;
2. Failure to evaluate/establish technical basis for existing LLs;
3. The “Local Limits” in our Pretreatment Permits are not technically-based, due to the lack of supporting analysis and documentation.

Corrective Actions:

1. Identify POTWs to develop or evaluate need for LLs;
2. Evaluate POTWs for the need to develop and implement LLs;
3. Evaluate existing LLs to ensure for adequacy;
4. Establish technically-based LLs for POTWs that need LLs.

Inspections & Sampling

Requirement: 40 CFR 403.8(f)(2)(v)

- Randomly sample and analyze effluent and conduct surveillance activities to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards.
- Inspect and sample the effluent from each SIU at least once a year.

Deficiencies:

1. Failure to conduct annual independent compliance sampling at SIUs.
2. Failure to sample for all pollutants at SIUs;
 - Total Toxic Organics.
3. Failure to conduct adequate independent sampling.
4. Failure to conduct annual inspection of all SIUs.

Corrective Actions / Improvements:

1. Obtain true independent compliance samples;
2. Inspect SIUs annually.

Identification of Industrial Users

Requirement: 40 CFR 403.8(f)(2)

- (i) Identify and locate all possible Industrial Users which might be subject to the Pretreatment Program.
- (ii) Identify the character and volume of pollutants contributed to the POTW by the Industrial Users.
- (iii) Notify Industrial Users of applicable Pretreatment Standards and any applicable under RCRA.

Deficiencies:

1. We have inadequate procedures for identifying IUs.
 - Known IUs that have expanded
 - Inconsistent methods to identify new IUs
2. We have inadequate procedures for permitting IUs.
 - Need better criteria to evaluate whether IUs need a State Pretreatment Permit;
 - Inconsistent methods to assess “reasonable potential” and potential to contribute;
 - Rely on undefined, inconsistent local control.

Corrective Actions / Improvements:

1. Establish better procedures to identify IUs:
 - Industrial User Survey
2. Better permitting criteria for IUs:
 - Delineate between local regulation/state regulation;
 - Consistent methods to assess “reasonable potential”;
 - Establish “tiered permits” or General Permits.

Staffing

Requirement: 40 CFR 403.10(f)(3)

The Director shall assure that funding and qualified personnel are available to carry out the authorities and procedures required by the Pretreatment Program, including permitting, inspecting, sampling, and taking necessary enforcement for all SIUs.

Deficiency:

We have inadequate staffing to carry out Pretreatment Program requirements.

Corrective Actions / Improvements:

1. Evaluate FTEs necessary to carry-out Pretreatment Program in accordance with Federal Regs and to meet Program goals;
2. Explore municipal participation in Pretreatment responsibilities to enable State to administer an adequate Program.

Areas for Further Program Development

1. Sewer Use Ordinances (SUOs)

- We require Sewer Use Ordinances, but do not review them;
- We rely on SUOs for many of our permit conditions & effective local control;
- We rely on municipalities implementing their SUOs for local control.

2. Hauled Waste Procedures to protect POTW

- We should have guidelines for POTWs receiving hauled waste; or
- We should evaluate POTWs' hauled waste procedures.

3. Emerging Contaminants

4. Guidance / Assistance on Food Establishments, Nursing Homes, & Schools

5. Chemical Reviews



Where we want to be...

This is a great opportunity to bring the Program into a position to:

1. Consistently identify and evaluate Industrial Users
2. Regulate/control Industrial Users that have reasonable potential to cause or contribute to an exceedance of the Pretreatment Standards
3. Enable POTWs interested in taking on Pretreatment to do so
4. Eliminate redundant Industrial User regulation
5. Ensure adequate local controls for Industrial Users who do not trigger state-permitting criteria
6. Explore Pretreatment as mechanism for controlling emerging contaminants

EPA Response

| Task | Completion Date |
|---|-----------------|
| Gather benchmark info from other states. | August 1, 2019 |
| Legal determine whether statutory or rule changes are necessary to address Audit Report and delegation efforts. | August 1, 2019 |
| Plan Revision of Wastewater Rule. | <i>Ongoing</i> |
| Prepare outreach materials and convene stakeholders. | Fall 2019 |
| Develop proposed strategy (discuss options, potential fee increase, statutory or regulatory changes, etc.) | Fall 2019 |
| Obtain stakeholder input on strategy. | Winter 2019 |
| Finalize strategy and timeline and begin implementation. | Winter 2019 |

What does this mean for me?

1. We want to know whether or not you are interested in taking on Pretreatment responsibilities.
 - Developing an approved Pretreatment Program;
 - Performing inspections / sampling;
 - Writing Pretreatment Permits.

2. You will likely be asked to implement procedures to support the State Pretreatment Program.
 - Identifying new IUs;
 - Tracking IUs;
 - Establishing adequate Local Pretreatment controls;
 - Developing technically-based Local Limits;
 - Issuing and tracking allocations.



Coming into Compliance

The Program will be:

1. Modifying Priorities and Commitments list with EPA for next 3 FFYs
2. Pretreatment Rules (or at least Procedures)
 - State permitting criteria;
 - Evaluation of POTW need for Local Limits;
 - Procedures for technically-based Local Limits;
 - Division of State Pretreatment Program/POTW responsibilities;
 - POTW responsibilities to enable the State to carry-out the Pretreatment Program;
 - IU requirements and responsibilities.
3. Evaluating need for Pretreatment Program staff
4. Evaluating municipal interest in participating in Pretreatment
5. Exploring change in Statute to accommodate POTW Pretreatment Program
6. Enforcement Response Plan



Discussion

Discussion Rules

1. One person at a time
2. One question at a time
3. Be polite
4. Be concise
5. Respect each other's time
6. If we have a question we can't answer – we'll follow-up
7. We are recording

What Do You Want Out of Pretreatment

Given what you know now:

1. What is the ideal state of the Pretreatment Program?

- a. What do want from the Pretreatment Program?
- b. What does your POTW need from the Pretreatment Program?
- c. What expectations do you have of the Pretreatment Program?
- d. Is the Pretreatment Program meeting your POTW's needs?

2. What do you think can be/needs to be improved of the Pretreatment Program?

3. How can the Pretreatment Program be more effective?



Pretreatment Program Improvements

Given the deficiencies the Pretreatment Program faces and its current capacity:

- 1. Do you have any ideas how the Pretreatment Program can address its deficiencies?**
- 2. What's the best role for municipalities in addressing audit deficiencies?**
- 3. What does municipal support look like to you?**
 - Inspections
 - Sampling
 - Permitting
 - Identification of Industrial Users
- 4. Are municipalities interested in administering their own Pretreatment Program?**
- 5. What barriers would your municipality face taking on Pretreatment?**



Next Steps

1. Compile and analyze feedback
 - a. Potential follow-up poll
2. Develop strategy to address Program deficiencies
 - a. Program procedures;
 - b. Assess staffing needs;
 - c. Consider municipal interest.
3. Obtain stakeholder input on proposed strategy
4. Respond to EPA with planned corrective actions by Winter 2019
5. Work with POTWs for Pretreatment Program development
 - a. Recommend change in statute to accommodate POTW Pretreatment Program.

Thank you for participating.



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