

Vermont Department of Environmental Conservation

Watershed Management Division

Wastewater Management - Pretreatment Program



On September 13, 2019, the Vermont Department of Environmental Conservation (DEC) hosted a meeting with stakeholders involved with implementation of Vermont's Pretreatment Program. The purpose of the meeting was to educate stakeholders on the responsibilities of the Program; identify State and municipal goals for the Program; explain the current status of the Program following a recent audit by the Environmental Protection Agency (EPA); and obtain feedback on how the Program can be most effectively implemented.

One take-away message from the meeting was that most municipalities do not feel well-positioned to accept full delegation of the pretreatment program (e.g. inspection, sampling, permitting, enforcement), but that some program responsibilities might be most efficiently and effectively accomplished at the local level. In order to better understand how municipalities/towns feel about taking on some pretreatment responsibilities, we have provided a link to a short survey below. This additional feedback will be used to inform the development of DEC's strategy to improve the program in accordance with the findings in the EPA audit and carry-out the Program's goals and responsibilities.

[Please take the following short survey by Friday, October 25, 2019 to provide your feedback on how your municipality can support the implementation of the Pretreatment Program.](#)

What is the Pretreatment Program?

The Pretreatment Program is an important component of Vermont's Wastewater Management Program. The purpose of the Program is to protect municipal wastewater treatment facilities (WWTFs), sewage collection systems, receiving waters, and municipal workers from adverse impacts caused by discharges of industrial wastewater that is high-strength, contains incompatible materials, and/or contains dangerous substances. These objectives are achieved through a combination of permitting, inspections, sampling, and assistance to industries.

The Pretreatment Program is mandated under the federal [Pretreatment Regulations \(40 Code of Federal Regulations Part 403\)](#). Vermont is 1 of only 5 states to fully implement the Program for municipalities at the State-level; in most other states the Program is implemented directly by the municipality.

Current Status of the Pretreatment Program:

A recent audit by the EPA identified several significant deficiencies in how DEC is currently administering the Pretreatment Program. These deficiencies include inadequate sampling and inspection of permitted industrial facilities, excessive backlog of expired (administratively continued) Pretreatment Permits, failing to include technically-based local limits within Pretreatment Permits, and failing to identify and permit all Significant Industrial Users throughout the State. The audit also identified a lack of staff resources and capacity for the Program to carry-out these responsibilities in accordance with the Federal requirements.

We are under the following schedule with EPA to respond to the Audit:

- Fall 2019: Develop draft strategy to address audit deficiencies.
- Fall 2019: Distribute draft strategy to stakeholders and obtain stakeholder feedback on strategy.
- Winter 2019: Submit finalized strategy and associated implementation schedule to EPA.

DEC recognizes that correcting these deficiencies is crucial to administering an effective Program that ensures the protection and support of Vermont's WWTFs and their operators, surface water quality, and public health.

*DEC needs your input on how the Pretreatment Program can best be implemented while recognizing limited state and municipal/town resources. **Please let us know what capacity your municipality/town has to contribute to the Pretreatment Program. Thank you.***

Please direct questions and comments to Nick Giannetti: Nick.Giannetti@vermont.gov | (802) 490-6186