

Q1	Please identify who you are and what organization or municipality you are representing.	Respondent A	Respondent B	Respondent C	Respondent D
Q2	Please describe how and why the Pretreatment Program is important to your municipality:	Pretreatment programs improve the quality of the wastewater treatment facility process & the quality of the effluent. A good pretreatment protects the collection system from unwanted clogs, plugs and discharges.	We have seen the result of cumulative impacts of smaller or quickly growing high strength users on our WW plant. We need a consistent and clear approach and/or authority through or from the State to enforce regulations at the local level without fear that <i>the Municipality</i> is perceived as being punitive bc adjacent communities aren't following same regs.	some of the reasons include: WWTP has influent BOD levels above typical domestic WW levels, there are many industrial users with limited guidance, industrial users have higher impacts on a WW plant than a typical user so they need proper guidance to ensure they are accountable	I think the Pretreatment Program is a good idea to keep the plants from getting overloaded by high strength waste.
Q3	How can the Pretreatment Program be most effectively implemented for your municipality? Why?	Funding the resources necessary to implement a program. A good program will require funding for manpower, education program and enforcement.	Not sure yet- but as said about we believe it can likely be implemented locally but need support and consistent framework from stAte. Until we have delegates WW permit authority, need to ensure that state WW permit process catches changes in use/increase in flow that involve high strength users.	<i>TheMunicipality</i> is implementing a City specific pretreatment program so we need to work closely with the State to ensure there are clear responsibilities. Having the State review the development of <i>the Municipal</i> program is important.	It would be a good idea to get the industries involved. That way they will understand more of what we are trying to do.
Q4	Can your municipality develop and implement its own Pretreatment Program, rather than relying on the State Program?	Yes, our municipality can implement the Pretreatment Program at the municipal level.	Yes, our municipality can implement the Pretreatment Program at the municipal level.	Yes, our municipality can implement the Pretreatment Program at the municipal level.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.
	Please provide some detail about your answer. :	Our Municipality could implement a Pretreatment Program, but the program will require a change in fee structure. Sometimes it is difficult to start a new program without funding options. Wastewater operations struggle for tax & user fee revenues, competing with police, fire, schools & public works operations. State Fees and permits also impact local spending for new and existing programs. The new stormwater regulations have also added another layer of expenditures.	We are about to undertake a study of developing a locally based pre treatment program. We will likely need to increase staffing resources however.	Yes, but <i>our Municipality</i> still may want to rely on the State for certain aspects of the program. Maybe the State can still remain an important player when it comes to enforcement. Maybe the state can still play an important role when it comes to reviewing agreements/permits with users.	I think if the state gets involved it will make the industries be more active in what they discharge.
Q5	What are the barriers that could prevent your municipality operating its own Pretreatment Program? What would your municipality need to overcome those barriers?	funding	Staffing resources. Political Will to regulate and require changes to existing businesses. Overcoming them could be accomplished through those clear and consistent regs/framework by state.	Resources are critical for all communities. Maybe the State could help by demonstrating what support they can provide to help highlight any gaps that communities need to pick up.	having the right guidelines to go by. having all pretreatment programs be the same
Q6	What Pretreatment related activities can your municipality perform to support the State's implementation of the Pretreatment Program:	Identifying new and tracking expanding industries connected to the sewer collection system	Sampling of some or all permitted industries. As currently envisioned we would do all of the above.	Issuing permits for specific sectors/industries. <i>The Municipality</i> may be able to help with each of the items above. This survey does not allow multiple selections. These comments are my opinion and do not necessarily represent the official stance of <i>the Municipality</i> . Use these responses as a guideline because they may need to be adjusted as our program gets developed.	Sampling of some or all permitted industries
Q7	What barriers does your municipality face from taking on Pretreatment related activities (such as sampling, inspection, or industrial user tracking) to support the State's implementation of the Pretreatment Program? What would your municipality need to overcome those barriers?	funding	Staffing resources. Development of program/framework:	see response to question 5.	to have someone from the state to at least once introduce them selves and what we are trying to accomplish

Q1	Please identify who you are and what organization or municipality you are representing.	Respondent E	Respondent F	Respondent G	Respondent H
Q2	Please describe how and why the Pretreatment Program is important to your municipality:	Pretreatment is important to protect the proper operation of a WWTF and to ensure its long term sustainability. Also to protect waters of the State from discharges that pass through a WWTF process without proper treatment.	We don't have the staff or expertise to support pretreatment well. The state program does.	Program can provide uniform guidance/rules for defining industrial discharges that require a permit, technical guidance on requirements for technical basis for specific permit limits.	To protect the Wastewater System/Facilities/Population from harm.
Q3	How can the Pretreatment Program be most effectively implemented for your municipality? Why?	1. By properly controlling and overseeing industrial discharges before the connect to the collection system. 2. Providing assistance to both the municipalities and the industrial dischargers regarding proper wastewater management and control	If it was sufficiently staffed at the state level.	Uniformly across the state, so there is not an economic disadvantage for one community to permitting industrial dischargers. Additionally, prohibiting the practice where the cost to treat high strength waste is passed on to domestic rate payers state wide.	By DEC for uniformity across the State. Without DEC running the program business's may "shop" for the most lenient municipality locate in which will force the more "stringent" municipalities to reduce their rules and cause overall harm to the Vermont Environment.
Q4	Can your municipality develop and implement its own Pretreatment Program, rather than relying on the State Program?	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot implement a Pretreatment Program at the municipal level.
	Please provide some detail about your answer. :	(I presume a formally delegated EPA Pretreatment Program) With respect to my clients, they lack the resources (both staff and monetary) and technical expertise to implement a Pretreatment Program at the local level. Implementing an EPA approved Pretreatment Program is a complex task (delegation, reporting, inspections, permits, etc) and most VT municipalities do not have staff with adequate knowledge of these issues or available staff to undertake these tasks. The program should be implemented at the State level and supporting by the municipalities.		Does not apply. (consultant)	We do not have the staffing or expertise to operator a Pretreatment Program. Taking over the Program also forces a municipality to "police" what are often the largest employers in town. DEC giving this program to the municipalities would completely "upend" the system and will basically be the end of a Pretreatment Program in Vermont eventually causing potential environmental damage when DEC should increase staffing to this important program for increased regulation including nutrient loadings included and a FOG program.
Q5	What are the barriers that could prevent your municipality operating its own Pretreatment Program? What would your municipality need to overcome those barriers?	Lack of legal authority, properly trained staff, physical resource and adequate of staff. More FTEs, proper training, equipment, upgraded IT systems for EPA reporting, financial assistance. Statutory and local Ordinance changes	Cost of the technical expertise. Offset funding.	Financial resources. My guess is operating budgets would then increase and costs would be passed on to rate payers.	Staffing/money. If the State were willing to fund a position(s) at <i>Municipalities</i> and increase State Regulations so programs were bound by State rules. This is another unfunded mandate passed down to the core service areas which will only increase movement out of these areas into the non-core service areas which will increase forest fragmentation, stormwater runoff, etc. Forcing this program on the municipalities will result in decreased Water Quality throughout the States.
Q6	What Pretreatment related activities can your municipality perform to support the State's implementation of the Pretreatment Program:	Identifying new and tracking expanding industries connected to the sewer collection system	Sampling of some or all permitted industries; We could also ID new and track expanding industries.	Does not apply to consultants	None. We are understaffed per DEC inspection report how could we possibly take this on? The whole concept of passing this Program to the municipalities is the opposite of DEC's MISSION STATEMENT: "To preserve, enhance, restore, and conserve Vermont's natural resources, and protect human health for the benefit of this and future generations." None. Changing the program when it needs more enforcement and regulations will cause less protection of human health and will NOT preserve, enhance, restore, and conserve Vermont's natural resources.
Q7	What barriers does your municipality face from taking on Pretreatment related activities (such as sampling, inspection, or industrial user tracking) to support the State's implementation of the Pretreatment Program? What would your municipality need to overcome those barriers?	Additional staff and equipment Knowledge of industrial discharges (training) Knowledge of Pretreatment Regulations and categories	Training and peer exchanges of best practices.	Sampling is tricky in that there often is not a location to get a representative sample. Staffing resources is a constant issue for municipalities, even if there is budget. Cost is the other factor.	State funding for the positions created. Stronger regulations for uniformity across municipalities so business's don't "shop" for the municipalities with the most lax regulations. THIS IS A VERY BAD IDEA.

Q1	Please identify who you are and what organization or municipality you are representing.	Respondent I	Respondent J	Respondent K	Respondent L
Q2	Please describe how and why the Pretreatment Program is important to your municipality:	We are heavily impacted by a company that makes cheese products.	Industrial discharges can upset the treatment process and put our ability to operate within permit limits under stress. Pretreatment coupled with WW strength surcharges can provide an incentive for private investment in shouldering some of the water quality protection burden.	Recently, breweries and distilleries have been opening in <i>Municipalities</i> . A strong Pretreatment Program will help protect the receiving waters, public health, collection system and the <i>WWTFs</i> throughout the State.	If not for the Pretreatment Program, we would have trouble identifying and regulating sources of high BOD, TSS, metals, and other pollutants coming into our wastewater treatment plant.
Q3	How can the Pretreatment Program be most effectively implemented for your municipality? Why?	I see it as a joint involvement with both the state and municipality working together. I feel that we have a good understanding of how we are being impacted but need the support of the state for enforcement purposes.	Not sure. I think a periodic (every 5 years?) review of industrial operations to make sure all dischargers that should be pretreating are identified. This could be done cooperatively between the utility and the state.	Before every identified high strength waste producers begins manufacturing in a town - the State and the municipality should have a mandatory sit down with the business owners and discuss the towns sewer ordinance, the implications of getting a pretreatment permit and what they could do to avoid getting a pretreatment permit. This would help build a good line of communication and flow of information between all interested parties right from the start.	A combination of local and state efforts. On the local level, identification of high demand discharges, local regulation, business effluent sampling and testing. On the state level, assistance with permittee inspections, setting up local regulations, enforcement of state and federal discharge limits, and some guidance when problems occur.
Q4	Can your municipality develop and implement its own Pretreatment Program, rather than relying on the State Program?	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.
	Please provide some detail about your answer. :		We can perform monitoring and take the lead on surveys of potential pretreatment candidates. We can also help with communications with current and potential pretreaters since they are already our customers.	The City would need to create a new position for this work - staffing levels.	We can do some sampling and testing, but i am not sure what our options are for enforcement when flagrant/repeat violations occur.
Q5	What are the barriers that could prevent your municipality operating its own Pretreatment Program? What would your municipality need to overcome those barriers?	We lack the time and money to take on this task ourselves and also need the support of the state when pretreaters are not following proper procedures.	The federal requirements are most likely beyond our ability to comply. We have a very small engineering division that is stretched thin right now.	Staffing levels. Financial assistance from the State.	In my estimation, a Pretreatment Program is almost an entity unto itself. Manpower for sampling, and money for testing could be a couple of factors. Then, as i mentioned before, how much authority does a town or sewer district have when it comes to enforcement.
Q6	What Pretreatment related activities can your municipality perform to support the State's implementation of the Pretreatment Program:	Identifying new and tracking expanding industries connected to the sewer collection system. Other/Comment: Could also support in sampling but could only select one item on the list.	Inspection of some or all permitted industries. Other/Comment: This only allows one answer. Inspection, sampling, and tracking connections are all possible.	Sampling of some or all permitted industries	Identifying new and tracking expanding industries connected to the sewer collection system. It seems odd that i can't check more than one. We could probably do some sampling, some inspections, and most of the identifying and tracking industries could be more easily done at the local level. As far as issuing permits, again, i'm not sure what authority the town has to do that. Also, i'm not sure i want to become the "sewer police".
Q7	What barriers does your municipality face from taking on Pretreatment related activities (such as sampling, inspection, or industrial user tracking) to support the State's implementation of the Pretreatment Program? What would your municipality need to overcome those barriers?	As stated previously, we don't have the resources to take this on completely, but can certainly be involved.	We would potentially need more sampling equipment and funding for lab work.	Financial assistance.	Manpower, equipment such as samplers etc. and money for laboratory testing.

Q1	Please identify who you are and what organization or municipality you are representing.	Respondent M	Respondent N	Respondent O	Respondent P
Q2	Please describe how and why the Pretreatment Program is important to your municipality:	It is important for the industry (small or large) to have an understanding of how their discharge effects the treatment process and that some discharges is actually a loss of resources for the industry itself. The State needs to be the heavy in this relationship of industry and municipality.	The Municipality receives waster from numerous industrial sources. While most are innocuous, there are some very high BOD loadings in spill events and substantial demand on the facility to treat biological wastes. the Pretreatment program offers the City a means to establish controls to preserve the operation of the WWTF	As an operator it is imperative that we know the strength of discharges to the Wastewater Treatment Facility. We have several businesses that have discharges that can affect the operations at the plant, and the more we know what is coming in the better we can treat those wastes. The sampling schedules and results that are in their permits play a large role in that.	FOG are a costly maintenance item in the collection system. Ragging and especially dental floss continues to damage transfer pumps as well as lagoon aerators.
Q3	How can the Pretreatment Program be most effectively implemented for your municipality? Why?	We have a fairly comprehensive program but we need the state to mirror our permits (as they do) and keep the state permits as is or expand them into small users. The State needs to be the enforcer/heavy.	In large part the City can implement a Pretreatment program. There are some issues - resources, clear authority, technical and professional competence among them. Current staffing ofrht eCity is long-term high claiber staff that have addressed many different events. They know the issues and effects so the City is in a good position currently. Retirements could affect the knowledge base that would be needed to set standards and complete forensic reviews in an event. The City has general authority over discharges to its wastewater system. We do not have an explicit right of entry, tho we have never been denied. For the program to be effective, random testing or stratified testing should occur. Such efforts may be beyond the resources available to the City. And the nature of that function would likely be better served by the State as it is highly specialized, small frequency but high value task.	I think the basis of which it is operating is very good. The downfall that I see is timely inspections, timely enforcement of NOAV's, and more dialogue with the municipality when these permits are up for renewal. It seems that that there is a disconnect between the municipality and the State to a degree. I believe that is probably due to understaffing.	Reaching out to the business community and an updated enforced sewer ordinance. The Municipality needs to get behind the initiative but has been slow in doing so. Also, some of the FOG treatment implementation will involve capital costs to customers.
Q4	Can your municipality develop and implement its own Pretreatment Program, rather than relying on the State Program?	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.
	Please provide some detail about your answer. :	We do have a pretty good program but we need the state to be the enforcer.	The Municipality has strong technical and professional capacity currently. Any City program would be modeled after the current State program. There are some highly specialized services- particularly related to enforcement and forensics that would be difficult for the city to complete. the City would be interested in strengthening its work with Pretreatment permitting with a graduated transfer of responsibility and some functions reserved to the State.	I am responding to this question as a contract operations operator not the municipality. I believe we could handle doing sampling and data collection that is pertinent to the yearly inspections. We also have the technical data to back up what the limits in permits should be. There needs to be a better system for the municipalities to implement changes in existing permits as circumstances change. The State can open and revise our NPDES permits if they deem it necessary, but we were told we cannot open and revise a pre-treatment permit. Only the Pre-treatment Permit holder can.	The Municipality can implement a Pretreatment Program to a degree, but State involvement and would greatly assist.
Q5	What are the barriers that could prevent your municipality operating its own Pretreatment Program? What would your municipality need to overcome those barriers?	Enforcement - Towns to not have the will to be the enforcer. Too much local pressure. Out of town persons like the state is needed.	There is some staffing demand and we are currently understaffed. Technical support in developing and operating a random testing program for pretreatment enforcement is needed. Concepts like chain of custody, proper sampling techniques, sample preservation are all examples of issues in remote sampling.	Again, this is from an contracted operator not the municipality. I believe money and manpower are the 2 primary barriers. So money would help overcome both. I believe the money would be better spent at the State level with more manpower. You should be the experts using that knowledge state wide, rather that multiple people with a little expertise at the municipal level	There would be no barriers that would 'prevent' the Municipality from operating its own PTP, however manpower and financial resources will be a challenge. We would need to have a more intensive outreach program to the community and look at allocating from other budget line items.
Q6	What Pretreatment related activities can your municipality perform to support the State's implementation of the Pretreatment Program:	Issuing permits for specific sectors/industries. This would not allow me to select more than one. Check off 1 (but would be a town permit, still need a state permit) Check off 2 also. The state needs to go back to the way it was with Andy Fish going around and collecting samples and running them or sending them to a lab.	Issuing permits for specific sectors/industries. permitting, inspecting, identifying new sources - possibly sampling growing into compliance and enforcement (single check box above)	Inspection of some or all permitted industries. It wouldn't let me click on more than 1. We also could do sampling, and identifying, which we already do.	Inspection of some or all permitted industries. EFUD could be involved with inspections and sampling as well as identifying and tracking expanding industries to the sewer system
Q7	What barriers does your municipality face from taking on Pretreatment related activities (such as sampling, inspection, or industrial user tracking) to support the State's implementation of the Pretreatment Program? What would your municipality need to overcome those barriers?	Some additional staffing. We have 7 different industries in the town with Town Industrial Discharge Permits (3 of those 7 also have State Permits). Sampling, tracking would require additional staffing (estimated at 8 hours a week).	staff, some training and some equipment	I cannot answer this question for the municipality	The industrial user tracking would be a challenge initially. A data base and a computer program or excel spreadsheet would need to be developed. We would need some technical support and some field guidance to assist.

Q1	Please identify who you are and what organization or municipality you are representing.	Respondent Q	Respondent R	Respondent S	Respondent T
Q2	Please describe how and why the Pretreatment Program is important to your municipality:	To advise the Town what allocations we should allow to permit; to make changes to Town Sewer Ordinance to best protect WWTF (calculate loading); to determine sampling practices; to insure Town doesn't exceed permit limits (WWTF/Residuals); to protect employees	We need the weight of DEC regulating our industrial users, as we need to maintain more of a local partner role. Industrial users are affecting our treatment process.	We are involved with several communities specific to high strength industrial customers.	Which program? If the state, it provides an important update for applicants on current rules that govern connection above and beyond the Sewer Use Ordinance. This is important as most companies view connection as a financial liability and will often do little for compliance without the education process that occurs with an ANR review. IT also provided back up for the Facility to ensure its own permit compliance OR that the load is small enough that the review is deferred by the state and then delegated to the local facility.
Q3	How can the Pretreatment Program be most effectively implemented for your municipality? Why?	Respondent skipped this question	Using it's current model, but with more movement and resources. There are at least 4 industrial users in our town alone that should have a pretreatment permit, but do not.	For larger communities, they may have the staff resources to manage this program, however, many of the small and medium communities do not have the technical expertise nor staff resources to manage this program.	This is to be determined. The state may waive jurisdiction on individual applicants but the cumulative effect of many applicants can have substantial impact on a facility. The 5% load or flow is fine but it is not one size fits all. In other words, on a small facility, it does not take much to hit the pretreatment trigger. On a larger facility, 5% is nothing but the likelihood of additional applicants due to the availability of capacity and connections is very much increased
Q4	Can your municipality develop and implement its own Pretreatment Program, rather than relying on the State Program?	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.	No, our municipality cannot fully implement a Pretreatment Program, but we are willing to support the State's implementation of the Program.
	Please provide some detail about your answer. :	The WWTF is probably in a position to assist State with sampling and inspections, but they would have to be better trained in what expectations the State would have of them. The Town would probably still rely heavily on the State for guidance on allocations/loading to the WWTF; what entities could endanger limits to current permits and how to best change ordinances to protect the WWTF from those conditions; enforcement. We would essentially be building a program from the ground up with very specific guidance from the State	Under certain conditions, we may be able to provide sampling support of a state program.	Most small and medium communities do not have the resources to implement this program at the municipal level.	This question goes to Policy and most operators are not the policy makers. A joint program with clear hand off points may be more palatable to larger facilities. The ANR provides an important back stop should somebody fall below review criteria and then adopt negative practices that put them back on the radar. An example of such is a brewery increasing production without notifying the municipality. This happens and is more likely in a regional facility that services multiple towns yet has no connection to those community planning and zoning operation. This may be especially important IF a program is developed that considers the cumulative impact of similar operations on municipal facilities.
Q5	What are the barriers that could prevent your municipality operating its own Pretreatment Program? What would your municipality need to overcome those barriers?	Knowledge; possibly manpower; supplies (ie, samplers); budget increase due to contract laboratory costs for analysis	The barriers are overwhelming and varied. A large one is the dynamics of small town politics and the effect of influence that can be brought by a large employer. This one alone PREVENTS an effective program being run by small towns. The other big one is time & resources. We don't have either.	Technical assistance and staff resources.	Policy, The addition of staff to implement the program, Ordinance that allows right of entry across municipal boundaries, processing this through multiple community regulatory boards, etc. I am sure that there is more that will be considered over time.
Q6	What Pretreatment related activities can your municipality perform to support the State's implementation of the Pretreatment Program:	Sampling of some or all permitted industries. Probably could also assist with inspection of some or all of the permitted industries after training/guidance from State. Probably could also assist with providing analytical results to track compliance with/enforcement of permits. Above all depends on manpower and costs of program implementation. This is new territory :)	Sampling of some or all permitted industries. Question only allows one answer. We could provide sampling assistance if DEC allows the flexibility to do it on days we already run to Endyne. We can also help ID new/expanding users.	Identifying new and tracking expanding industries connected to the sewer collection system	Issuing permits for specific sectors/industries. all of the above but only one could be checked. If formed properly, this could be a mutually beneficial partnership to both the State and to the facility.
Q7	What barriers does your municipality face from taking on Pretreatment related activities (such as sampling, inspection, or industrial user tracking) to support the State's implementation of the Pretreatment Program? What would your municipality need to overcome those barriers?	Manpower, sampling supplies and costs for analysis (that testing which can't be done in WWTF lab) -- but initially training and guidance	Access and an established DEC permit & protocol. Inspection should be done by DEC.	Staff resources and additional funding.	Potentially permit conditions, new required universal ordinances that provide the teeth needed to participate in a joint program, etc. Again, these are policy matters that will ultimately need to go to a governing body for approval.

Q1	Please identify who you are and what organization or municipality you are representing.	Respondent U	Respondent V
Q2	Please describe how and why the Pretreatment Program is important to your municipality:	Currently the Town does not have the resources or expertise to take responsibility for a pretreatment program. The Town feels that this program should be housed, as it currently is, in VTDEC. This appears to be the most efficient means of conducting a pretreatment program. Below are the main points the Town wishes for the State to consider: 1. State oversight allows for consistency throughout the entire State. 2. Expertise is located in one location rather than relying upon individual management over 93 statewide wastewater facilities (i.e. 93 individuals that must be educated in the various industries). 3. Efficiency due to economy of scale at the State level. 4. Allows the State to be the enforcer, rather than the municipalities. This is vital in small communities with very local politics.	Any pre-treater can wipe out the municipal plant - it is very important to regulate them! The state program carries a lot bigger stick than the town.
Q3	How can the Pretreatment Program be most effectively implemented for your municipality? Why?	We currently have one permitted pretreatment entity. We expect to have an additional 2-3 within the next year or two with existing businesses. We believe the State is currently doing an acceptable job and is likely to improve with a dedicated individual. As the specialty food, brewery, and spirits industry grows it is likely an additional person may be needed. State evaluation of high-strength industries. Preliminary screening of potential high-strength dischargers is extremely appreciated at the local level.	I was shocked to see VT has let it slip so far. It is one of the most important programs you have. Pretreatment prevents a large share of upsets - by not regulating them, all Vermont waters are at risk.
Q4	Can your municipality develop and implement its own Pretreatment Program, rather than relying on the State Program?	No, our municipality cannot implement a Pretreatment Program at the municipal level.	No, our municipality cannot implement a Pretreatment Program at the municipal level.
	Please provide some detail about your answer. :	We just do not have the expertise or resources available currently, nor do I see us having the ability in the near future. We currently have one of the highest sewer rates in the State (\$13.33/1000 gal of water used) and we are on the cusp of a \$30 million upgrade within the next decade. This puts the rate payers in a very tough position since this will require a significant rate increase. We would also like to establish a FOG program, but unfortunately we just do not have the resources for any additional initiatives in the near future.	I consider this the State's purview. Yes, I have responsibility to track down upsets, but regulation should be at the state level. You haven't hesitated to leverage public opinion against municipalities to get compliance - why wouldn't you - why haven't you - used this same leverage against big polluters? As an operator, I often find the ONLY reason I get funds for the WWTF is because the state-YOU-regulate it.
Q5	What are the barriers that could prevent your municipality operating its own Pretreatment Program? What would your municipality need to overcome those barriers?	See item #4 above. We would need the resources described above. We currently do not have the staffing or the funding needed.	Full authority and backing, with fines, at the STATE level.
Q6	What Pretreatment related activities can your municipality perform to support the State's implementation of the Pretreatment Program:	Sampling of some or all permitted industries. We could assist in the sampling since we currently have a portable sampler. As I am sure you are aware, there are many municipalities that have less resources than <i>our Municipality</i> . If <i>our Municipality</i> does not have the resources needed it is very likely there are only a handful of municipalities with any resources available.	None. I'm not in favor of this being shifted to municipalities. That being said, sampling, identifying and tracking industries would be activities, in some cases, we could support
Q7	What barriers does your municipality face from taking on Pretreatment related activities (such as sampling, inspection, or industrial user tracking) to support the State's implementation of the Pretreatment Program? What would your municipality need to overcome those barriers?	We lack the staffing, especially with the experience needed for inspections. We could overcome the barriers with funding for a dedicated position with the experience needed. However, this seems very inefficient based on the local need in this Town (few pretreatment permits). There is an economy of scale if the program remains with the State.	Manpower and administrative enforcement.