

How to Maintain a Sustainable Industrial Pretreatment Program

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Stephanie's intro



- ▶ Stephanie has been employed as the IP Coordinator for the City of Somersworth for over 30 years.
- ▶ Somersworth is a City with a population of 12,027 (2020 census) and a WWTF designed to treat 2.4 MGD.
- ▶ The City of Somersworth has had an approved IPP since 1984.

Jay's intro

- ▶ Been with EPA since 1993
- ▶ Started as a Multi-media investigator with the EPA Laboratory
- ▶ Spent 5 years doing civil and criminal investigations that include various types of inspections and monitoring of several programs
- ▶ Regional Pretreatment Coordinator since 1998

Housekeeping...

- ▶ Please silence your cell phones as much as possible, and if you need to take a call, please step outside.
- ▶ We're going to share not a top-ten list, but lots of tips of what has worked in the past and what will work going forward
- ▶ Please raise your hand **when (not if)** you have questions/comments. The first tip is that one of the best ways to maintain a sustainable program is to learn from your peers.

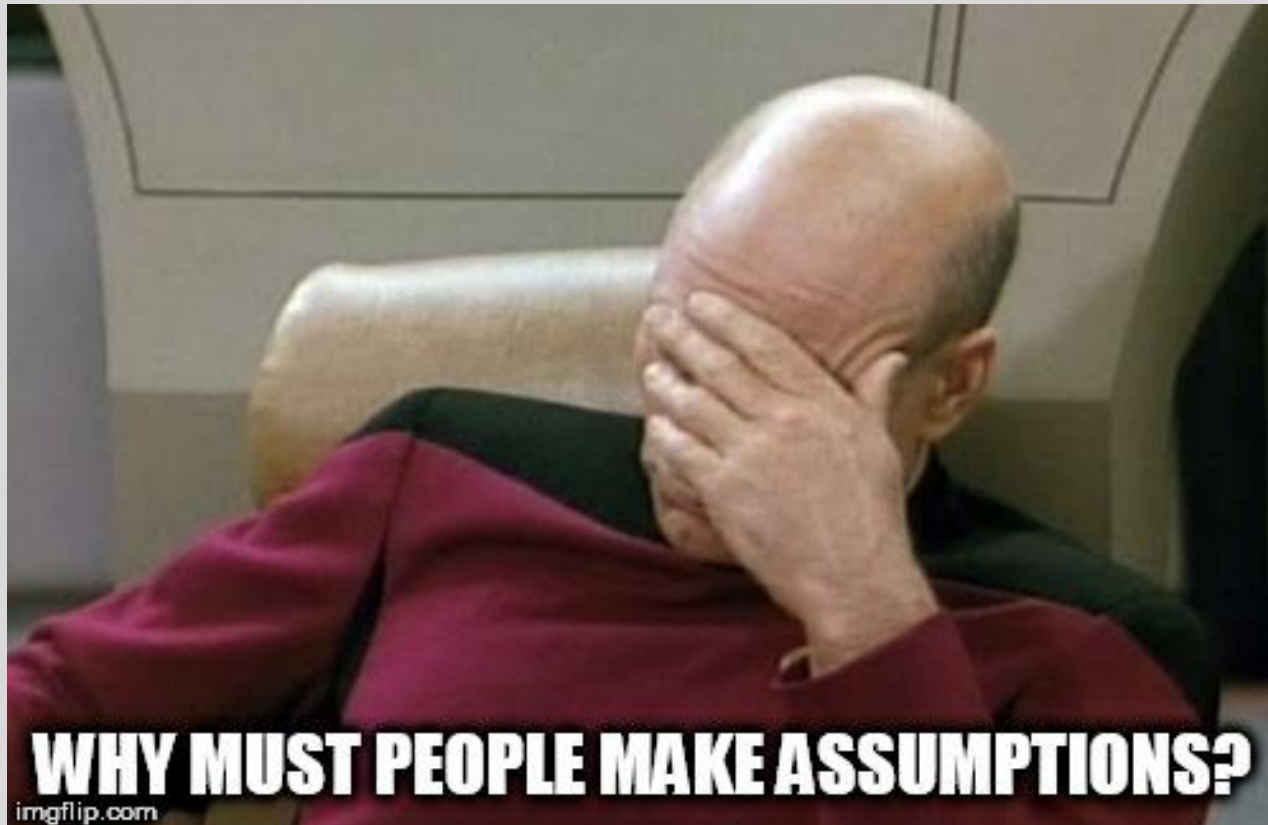
What does SUSTAINABLE mean?

- ▶ *adjective*

1. able to be maintained at a certain rate or level
2. able to be upheld or defended.

- ▶ Definitions from [Oxford Languages](#)

Assuming that you have a strong program to start...



What are some elements to maintaining a sustainable program?

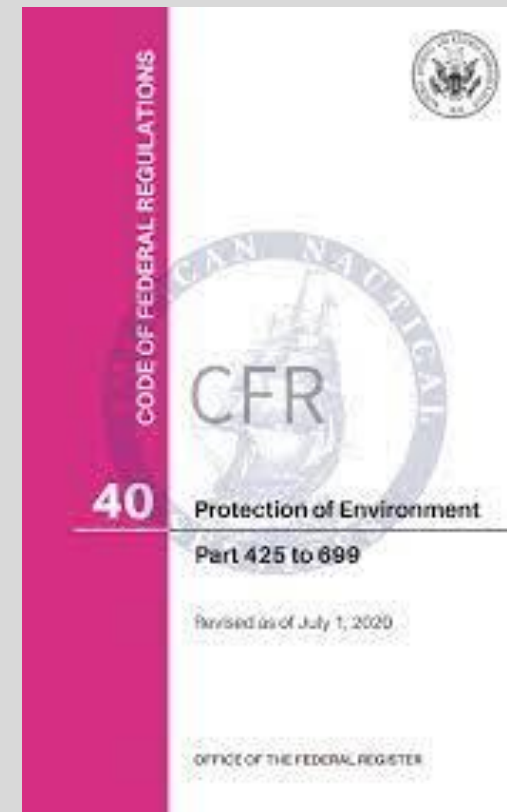
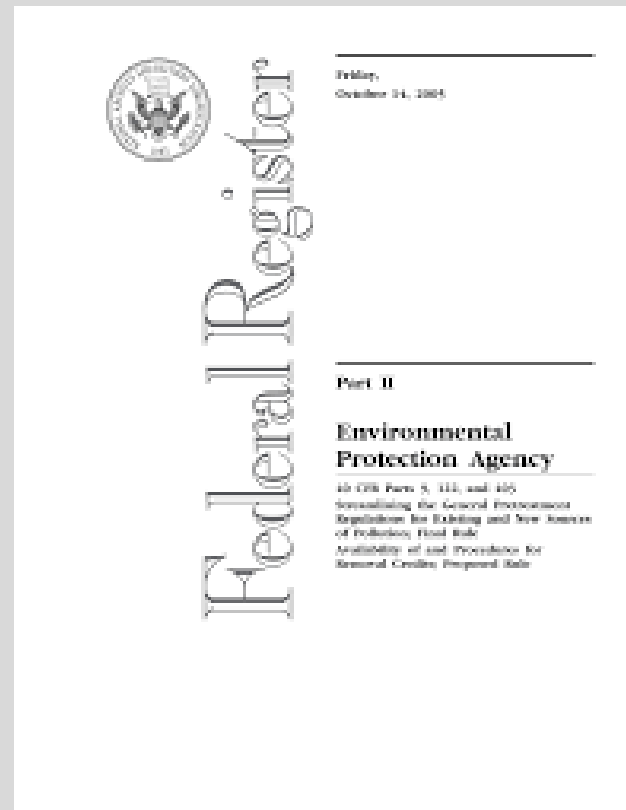
Hint: audience participation.....

What are the correct answers?



There is actually a punctuation mark called an interrobang, which replaces the combination !? or ?!. A sentence ending with an interrobang asks a question in an excited manner, expresses excitement or disbelief in the form of a question, or asks a rhetorical question.

Keep up-to-date with State and Federal regulations, policy and guidance



Electronic Code of Federal Regulations (e-CFR)

<https://www.ecfr.gov/>

<https://www.epa.gov/npdes>



This is WHY succession planning is important!



Do you have a
successor?

Succession Planning

- ▶ 1. cross-training
- ▶ 2. well-written inspection reports
- ▶ 3. SOPs
- ▶ 4. templates
- ▶ 5. embrace technology

Cross Training



Well written inspection reports

- ▶ Helps new people become familiar with the IU and the inspection procedure
- ▶ Helps YOU because you can review the previous year's report
- ▶ Makes audits easier

SOPs

- ▶ How to PREPARE for an inspection
- ▶ How to conduct an initial inspection
- ▶ How to conduct an annual inspection
- ▶ How to perform IU sampling

You can **NEVER** be too prepared

Template Examples

- ▶ Permits
- ▶ Inspection reports
- ▶ Signatory authority forms

EPA Templates can be found at:

<https://www.epa.gov/npdes/national-pretreatment-program-publications>

https://www.epa.gov/system/files/documents/2021-07/appendix_e_samplepermitfactsheetandpermit_2012.pdf

Embrace Technology

Pretreatment Coordinators Pretreatment@groups.io

A group for Pretreatment Coordinators and others who may be interested in the field. We mainly trade information and solutions and interpret what the EPA is imposing on us.

Group Information

- 1,651 Members
- 16,649 Topics, Last Post: 12:40pm
- Started on 11/28/00
- [Feed](#)

Group Email Addresses

- Post: Pretreatment@groups.io
- Subscribe: Pretreatment+subscribe@groups.io
- Unsubscribe: Pretreatment+unsubscribe@groups.io
- Group Owner: Pretreatment+owner@groups.io
- Help: Pretreatment+help@groups.io

How many trees have you killed today?



- ▶ The pretreatment program is extremely “paper-intensive”. Documentation is your evidence and support for enforcement, as well as your defense to justify your ability to implement your program as required.

Organize those files!

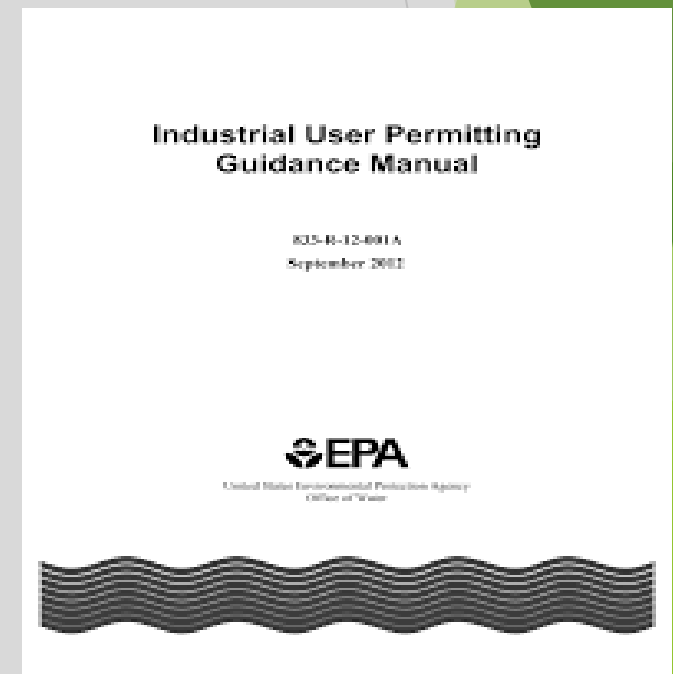


And back-up your files



Develop and use complete permit applications and permits

- ▶ Notice how this ties back in with succession planning? And organization?
- ▶ Help yourself out by staggering the expiration dates!
- ▶ Read this Guidance Manual at:
- ▶ https://www.epa.gov/system/files/documents/2021-07/pretreatment_iu_permitmanual.pdf



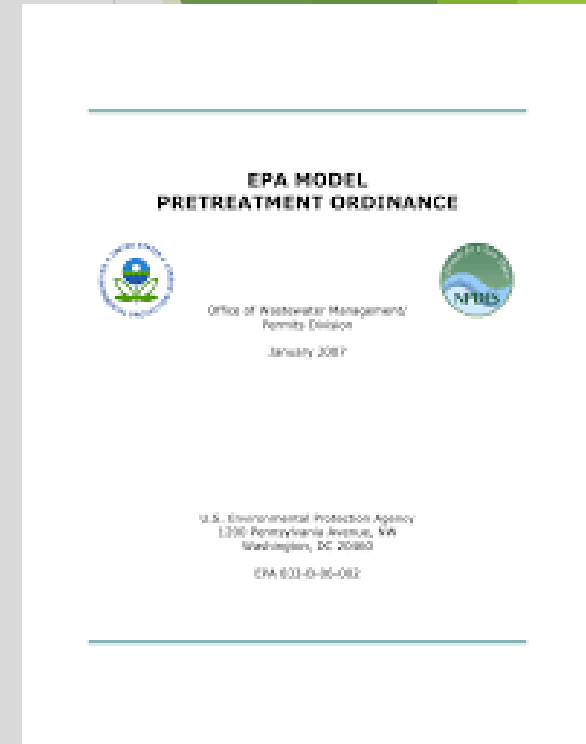
Fact Sheets are AWESOME!

- ▶ Fact Sheets are a 1-2 page snapshot of the most important pieces of information about an IU and its permit.
- ▶ Fact Sheets are a place for you to document your reasons for choosing the most stringent permit limits for categorical users.
- ▶ https://www.epa.gov/system/files/documents/2021-07/appendix_d_permit_factsheet_template_2012_0.pdf

Ensure the POTW legal authority and related documents are up-to-date and complete.

▶ There's a model ordinance to make this job

▶ https://www.epa.gov/system/files/documents/2021-07/pretreatment_model_suo_0.pdf



More about those “related documents”...we’re talking about the ERP

- ▶ Make sure that SUO and ERP language are in sync
- ▶ Do not adopt language that you’re not willing to enforce

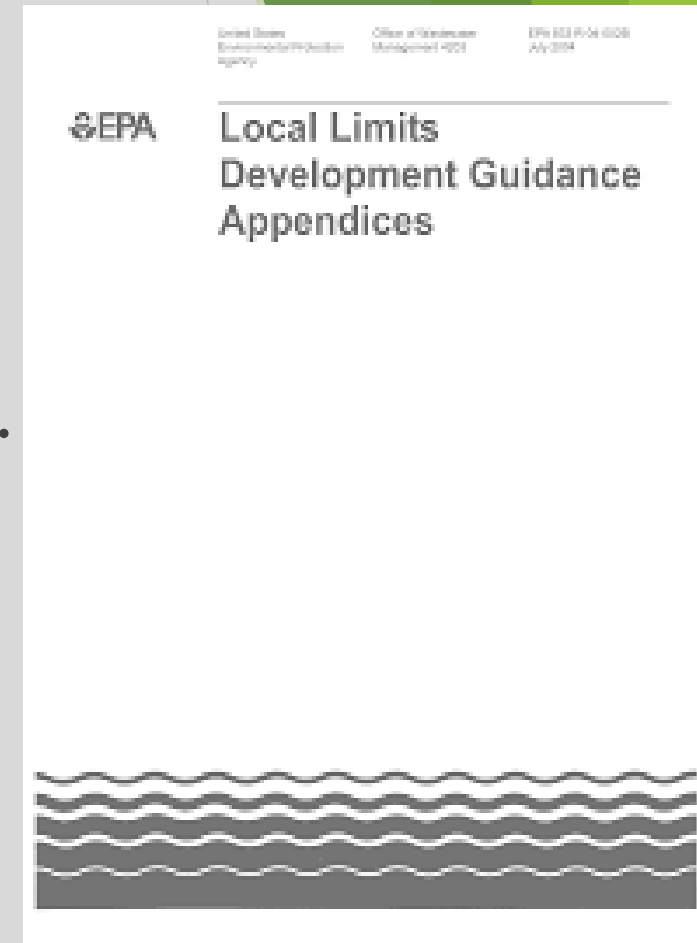
Take effective enforcement!



- ▶ Follow your adopted ERP - Enforcement Response Plan
- ▶ When the situation calls for it, be willing to take enforcement action that will ensure a return to compliance
- ▶ Show escalation when repeated non-compliance occurs.
- ▶ <https://www.epa.gov/system/files/documents/2021-07/owm0015.pdf>

Local Limits Development isn't scary

- ▶ There's a guidance manual
- ▶ Find some training
- ▶ Or use a contractor for local limits development, but require them to summarize assumptions/rationale for identification of POCs, how limits are to be applied, etc.
- ▶ https://www.epa.gov/system/files/documents/2021-07/pretreatment_local_limits.pdf



But once local limits are adopted, that's not the end...

- ▶ Track the MAHL and MAILs that were approved with your local limits to make sure limits are still valid and effective.

Random Fun Fact

- ▶ TLA stands for Three Letter Acronym!

About those EPA and State audits...

- ▶ Drag the most recent one out of your organized filing cabinet each January and check if you've actually implemented everything you said you were planning to implement. Do you have copies of associated public notices saved? Do you have approval documentation for program modifications?

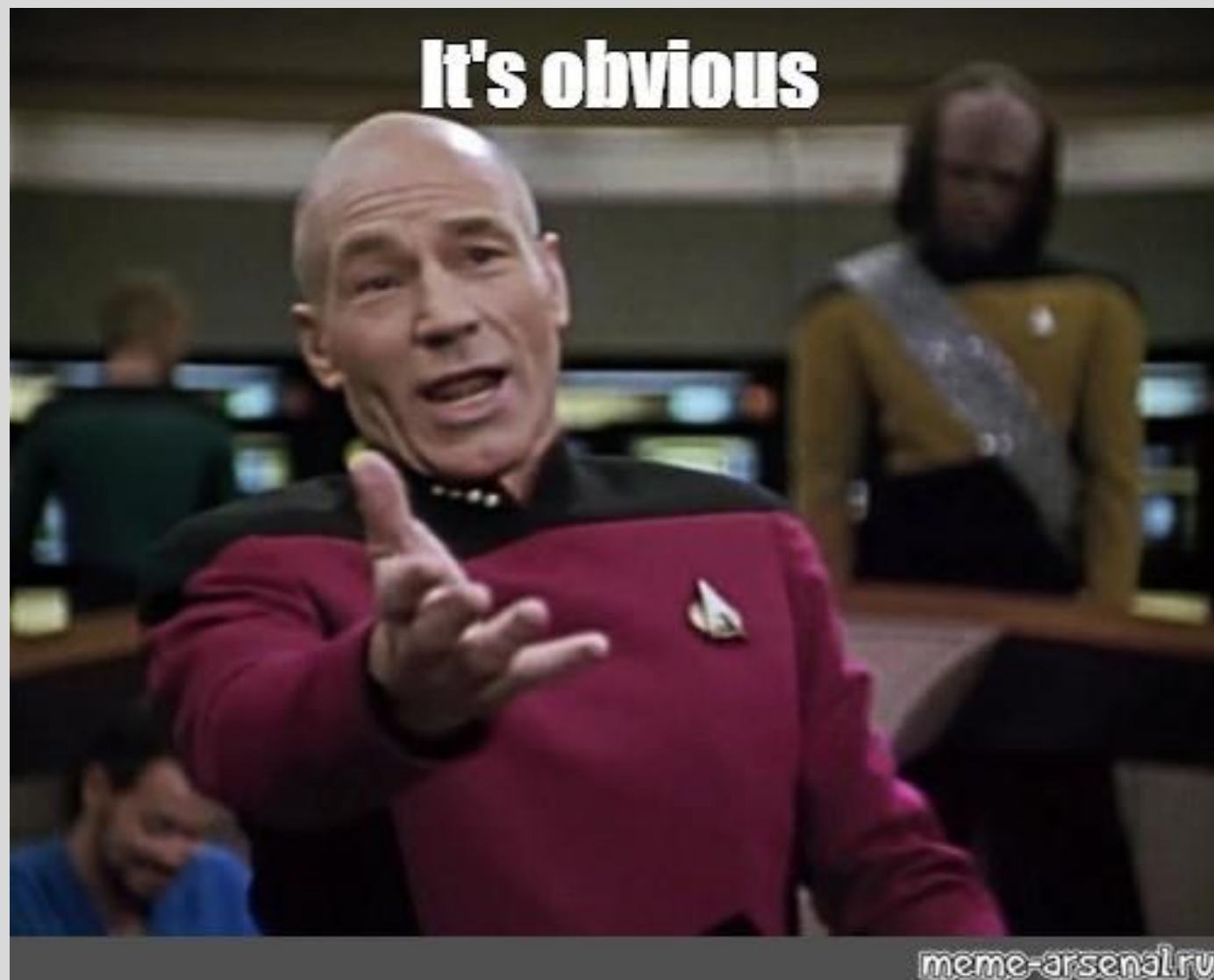
Be involved in the funding process to fight for resources

- ▶ EPA's intent is for the pretreatment program to be self-sufficient. Industrial Users should bear the cost, not rate-payers.
- ▶ In the world of local government, these decisions may be out of your hands due to politics, but stay informed!

Understand your NPDES Permit

<https://www.epa.gov/npdes-permits>

Attend workshops and trainings



Communicate effectively in two directions

- ▶ Upper management and permitted industrial users all need to be informed about program requirements and effectiveness.

Let's check out how many things Jay has crossed off our list



Which of these
hints/topics would you
like to talk more about?

Remember that you're a professional!

- ▶ I've got some great stories...**BUT JUST THE FACTS!**