



NC Pretreatment Conference

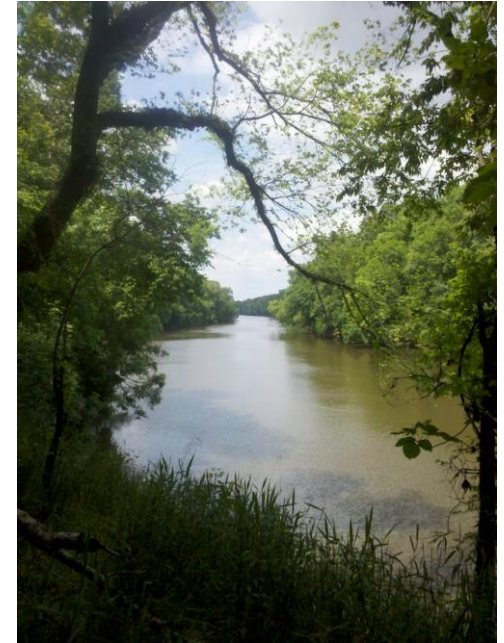
September 21, 2020



Changes at DWR

- **Recapping**

- Deborah Gore retired August 2019
 - PERCS Unit morphed into Municipal Permitting Unit
 - Director Linda Culpepper & Deputy Jim Gregson retired
 - Danny Smith named Director in February
 - Mike Montebello hired as Municipal Permitting Supervisor
 - Julie Grzyb from our own Complex Permitting promoted to Deputy Director in June 2020
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- WQPS Continues to struggle with staff shortages and permit backlog and project scheduling
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- Maybe considering Permit Fee adjustment last modified in 2007



DWR Updates

- NC DWR Permitting has converted to nearly paperless document management and record retention using Laserfishe program. -
 - Almost all submitted documents are now searchable on-line.
- Covid-19 Impacts to Pretreatment Inspections
 - 46 PCIs required - 25 confirmed, 3 - 6 scheduled
 - 23 Audits required - 6 confirmed, 3 more scheduled
- EPA has given us a mixed message on virtual and hybrid Video inspection
- Still working towards removal of Mercury Minimization Plans requirement in NPDES permit hope having to approach NC EMC in next few months



Legislation from 2020 Session

- **ELECTRONIC PERMITTING CLARIFICATION**
- **SECTION 15.** G.S. 143-215.1(b) reads as rewritten:
- "(b) Commission's Power as to Permits. –
- (4) The Commission shall have the power: Page 12 House Bill 308
- f. To issue a permit, certification, authorization, or other approval by electronic delivery, registered or certified mail, or any other means authorized by G.S. 1A-1, Rule 4.



Accessory Dwelling Units House Bill 873

- **Deems Permitted Accessory Dwelling units**

- **SECTION 4.(a)** Definitions. – For purposes of this section and its implementation, the following definitions apply:
 - (1) "Permitting by Regulation for Building Sewer Systems Rule " means 15A NCAC 02T .0303 (Permitting by Regulation).
 - (2) "Accessory building" means in one- and two-family dwellings not more than three stories above grade plane in height with a separate means of egress, a building, the use of which is incidental to that of the main building and which is detached and located on the same lot. An accessory building is a building that is roofed over and more than fifty percent (50%) of its exterior walls are enclosed. Examples of accessory buildings are garages, storage buildings, workshops, boat houses, treehouses, and dwelling units, etc. For purposes of this section, "main building" shall only include one- and two-family dwellings.
 - (3) "Building sewer" means that part of the drainage system that extends from the end of the building drain and conveys the discharge by gravity or under pressure to a public sewer, private sewer, individual sewage disposal system, or other point of disposal.
 - (4) "Lot" means a portion or parcel of land considered as a unit.
- **SECTION 4.(b)** Permitting by Regulation for Building Sewer Systems Rule. – Until the effective date of the revised permanent rule that the Environmental Management Commission is required to adopt pursuant to subsection (d) of this section, the Commission shall implement the Permitting by Regulation for Building Sewer Systems Rule as provided in subsection (c) of this section.
- **SECTION 4.(c)** Implementation. – Notwithstanding the requirements of General Permit No. WQG100000 and the limitation on applicability of 15A NCAC 02T .0303(a)(1), (a)(2), and (a)(3) to a building sewer that serves a single building, if a building sewer that serves a main building is deemed permitted pursuant to 15A NCAC 02T .0113, then a building sewer that serves an accessory building on the same lot that is connected to the building sewer for the main building, and a sewer shared between a main building and an accessory building, shall also be deemed permitted if the building sewer that serves the accessory building, and the sewer shared between the main building and the accessory building, meet the criteria in 15A NCAC 02T .0113 and all criteria required for that system in 15A NCAC 02T .0303, and no additional permit shall be required. This section shall only apply to sewers that serve one main building and one accessory building on the same lot.



EPA Cross-Media Electronic Reporting Rule

- NC DWR eDMR finally CROMERR compliant=No more paper DMRs.
- But other projects ...
- Electronic submission of projects HWA, LTMP,. . PAR? to DWR
- Cities and towns not CROMERR compliant submission of industrial data included in PAR etc. should be compliant



Reporting and Application Issues

- Data Reporting
 - Goes beyond Perennial discussion on process control sampling
 - Concerns over reporting requirements and interpretations from NCAC 2H .0506 (b)(3)(J)
 - Sampling taken from collection system
 - How to report on eDMR
- Concern over implementation of NC Library of Pollutants and NPDES permit application and associated permit shield.
 - Lots of case law I like to start with Piney Run



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- Triennial review of Water Quality Standards coming to WQC of EMC likely November out to public notice and meeting in early 2021
 - EPA requires states to review all proposed standards eg 94 human health, ammonia
 - NC concentrating on aluminum, cadmium and 1,4 dioxane for next cycle
- Continued concern from cities about cost and implementation of Water Effects Ratio
- Silver Chronic Standard difficult to implement future discussions

Questions?

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