



October 2021

*State Pretreatment Program Update
Municipal Unit*



Unit Reorganization (Complete)

Complex NPDES Permitting Unit (previously)

PERCS Unit (previously)

Industrial NPDES Permitting Unit (New)
[Municipal wasteload allocations,
modeling for POTW expansion]

Municipal NPDES Permitting Unit (New)
[NPDES, PT, Collection Systems-
alternative sewers, variances, flow
adjustments, assist with compliance &
Fast Track programs]

Doug Dowden, Supervisor

Michael Montebello, Supervisor



Municipal Unit Staffing in Central Office

Staff cross trained in both NPDES and PT Program areas
(In progress)

Michael Montebello, Supervisor
Municipal Major NPDES Permitting
Pretreatment Program
Sewer system/Alternative sewer permitting
Special Projects/ SOC Assistance
Wastewater Plant Expansions/New

Staff Engineer (TBD)
Sewer extension/Alternative sewer permitting
Fast track permitting program oversight
Delegated permitting program oversight
Variance, flow reductions

Charlie Miller, P.E. (NEW-In training)
Pretreatment program oversight
Pretreatment review & approval actions
Sewer extension permitting

Matthew Nevills, Part-time
Special Projects
Emerging Pollutants Tracking

Keyes McGee
Pretreatment program oversight/compliance
Sewer system extension permitting
Training, Pretreatment Assistance

Kristin Litzenberger
Document Management
Pretreatment program review
Assist with collection system permitting
Assist with NPDES Permitting actions

Diana Yitbarek
NPDES Permitting (Municipal Majors)
Pretreatment program review
Sewer extension permitting

Dana Folley, Part-time
Pretreatment program review
HWA Review

Staff Engineer (TBD)
NPDES Permitting (Municipal Majors)
ATC wastewater system permitting
Pretreatment Program assistance
NPDES Consistency Review

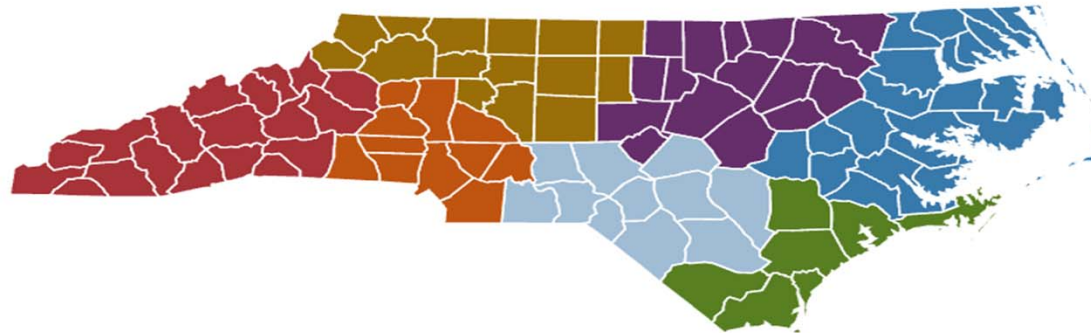
Gary Perlmutter
NPDES Permitting (Municipal Majors)
Special Projects
Pretreatment Program assistance

Cassidy Kurtz (until November 2nd)
NPDES Permitting (Municipal Majors)
Special Projects
NPDES Permit Tracking
Pretreatment Program assistance

FirstName.LastName@ncdenr.gov



Pretreatment Staff in Regional Offices



Red: Asheville Regional Office

Orange: Mooresville Regional Office

Brown: Winston-Salem Regional Office

Purple: Raleigh Regional Office

Light Blue: Fayetteville Regional Office

Green: Wilmington Regional Office

Blue: Washington Regional Office

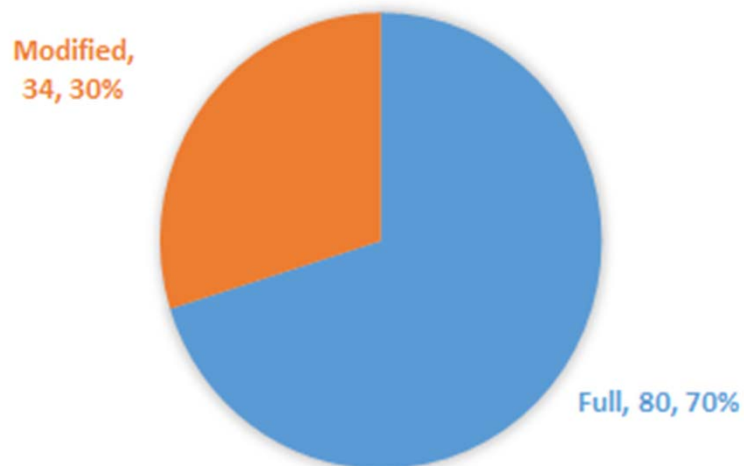
Regional Office	PT Contact
Asheville Regional Office (ARO)	Mikal Willmer
Asheville Regional Office (ARO)	Linda Wiggs
Asheville Regional Office (ARO)	Dan Boss
Fayetteville Regional Office (FRO)	Stephanie Zorio
Mooresville Regional Office (MRO)	Wes Bell
Raleigh Regional Office (RRO)	Cheng Zhang
Washington Regional Office (WARO)	Robert Bullock
Wilmington Regional Office (WIRO)	Tom Tharrington
Wilmington Regional Office (WIRO)	Helen Perez
Winston-Salem Regional Office (WSRO)	Alex Lowe
Winston-Salem Regional Office (WSRO)	Jim Gonsiewski

FirstName.LastName@ncdenr.gov

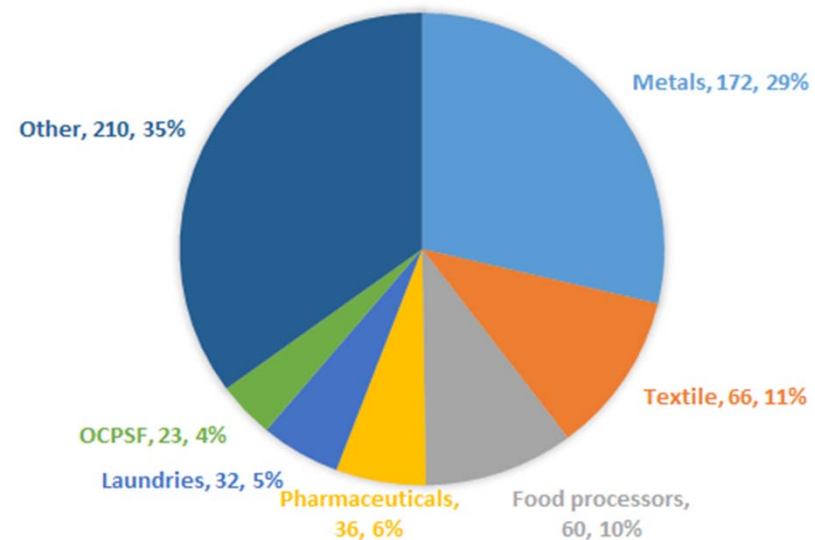


Pretreatment Programs and Significant Industrial Users (SIU's) in 2020-2021

114 Programs



Total Number of SIUs = 599





Pretreatment & NPDES Programs Goals

1. Consistency in decisions between both Programs (PT & NPDES)
2. Resolve PQL Issues
 - a. Update Long/Short Term Monitoring Plan (L/STMP) Models (In progress)
 - b. Follow Pollutant of Concern (POC) Review Form (Included as fact sheet attachment)





Pretreatment & NPDES Programs Goals

3. Address Emerging Compounds (e.g., 1, 4 dioxane & PFAS)

- a. Use Chemical Addendum with NPDES application
<https://files.nc.gov/ncdeq/Water%20Resources/aorlando/Chemical-Addendum-to-NPDES-application.xlsx>
- b. Updates in industrial waste survey (IWS) Submittal Form
 - i. Improves identification and classification of industrial users
- c. Evaluate local limits after NPDES permit is issued (180 days)
- d. 1,4 Dioxane - 2021 NC DEQ Strategy (Julie's presentation)
- e. PFAS - Follow EPA updates



2017 Recommended Practical Quantitation Limits (PQLs)

Compound	PQL**	Unit	Method***
Arsenic*	2.0	ug/l	
Cadmium*	0.50	ug/l	
Chromium	10.0	ug/l	
Copper	2.0	ug/l	
Lead*	2.0	ug/l	
Mercury	1.0	ng/l	EPA Method 1631E
Molybdenum*	10.0	ug/l	
Silver*	1.0	ug/l	
Selenium*	5.0	ug/l	
Zinc	10.0	ug/l	

*Lower than the current L/STMP Model

** If the NPDES permit **requires** a lower PQL, please update PQL as necessary and notify PT Staff in central office and regional office

*** Use Methods approved by 40 CFR 136





Pretreatment Program Updates 2021

Local Limits Evaluation & Industrial Waste Survey (IWS)

1. Local Limits Evaluation (**NEW** language in cover letter of NPDES permit)

- 180 days requirement to submit written technical evaluation to update local limits (Guidance in progress)

2. IWS

- Division can provide Spreadsheet from Manufacturers Register (Industry Select) if requested
- **New** excel form.
- <https://files.nc.gov/ncdeq/Surface%20Water%20Protection/NPDES/permits/Blank-IWS-Submittal-table.xlsx>
 - Include **all** Industrial, Commercial, and Institutional Users (e.g., Landfills, hospitals)
 - Include Source of Information
 - Include Primary SIC Code, 40 CFR, Primary NAICS (if available)
 - If Process Water is Pumped & Hauled, add destination information and provide Regional P&H approval
 - For 433 and 413 industries, include the complete assessment verification form
 - <https://files.nc.gov/ncdeq/Water%20Quality/Surface%20Water%20Protection/PERCS/Categorical%20User%20Information/40%20CFR%20433%20413%20Verification%20Form.pdf>

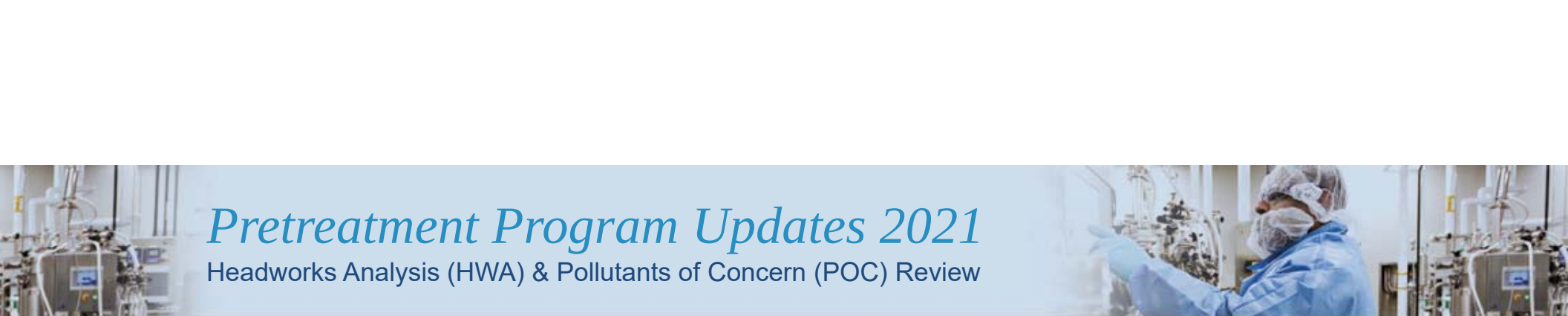


IWS Form for Submittal (Pending website update)

Industrial Waste Survey (IWS) Checklist

Facility Name:														NPDES Permit No:				Date:									
Person Completing IWS (Name and Title):																											
#	Name of Industrial User (IU) or Currently Unregulated	Source	Description of Business	Primary SIC Code	NAICS Code (optional)	Primary 40 CFR (if applicable)	Date Short Form was Received	Date Long Form was Received	Date of Last Site Visit or Contact	Is it in the Service Area? (Y/N)	Does it have Sewer Service (Y/N)	Check if not in Business (X)	Check if Permitted Septic System is in Place (X)	Check if IU has Domestic Flow Only (X)	Approx. Non Contact Process Water Flow (gpd)	Approx. Process Water Flow (gpd)	If Process Water is Pumped & Hauled, Add Destination Information	Significant Industrial User (SIU) Permit No.	Local Permit No.	Email Contact for SIU or Local Permit	Why SIU Permit is Needed						
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Pretreatment Program Updates 2021

Headworks Analysis (HWA) & Pollutants of Concern (POC) Review

3. Recent HWA Review Findings/Common Missing Items

- Obtain Water Quality Standards (WQS) from Reasonable Potential Analysis (RPA)
 - [Chronic concentration value]
- Provide ALL Sludge data when composting and land applying
 - Even when sludge is taken to a third party
- Variable/Inconsistent PQLs

4. Pollutants of Concern (POC) review Form as NPDES fact sheet attachment

- Review PQLs used in L/STMP vs 2017 recommended PQLs
- Consistency in POC in NPDES permit, L/STMP, and HWA



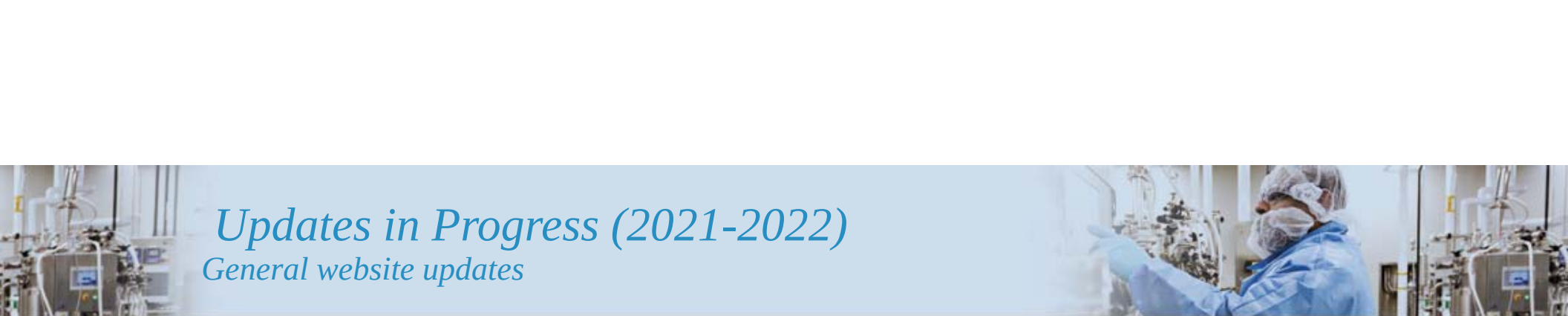
Pollutants of Concern Review Form

(In development – Find it in NPDES permit fact sheet attachment)

III. LTMP/STMP and HWA Review												
PW: Find S/LTMP document, HWA spreadsheet, and DMR for next section.												
POC in LTMP/STMP	Parameter of Concern (POC) Check List	POC due to New effluent limit or monitoring in NPDES	POC due to previous NPDES/ Non-Disch Permit Limit or monitoring	Required by EPA (1)	Required by 503 Sludge (2)	POC due to SIU (3)	POTW POC (Explain in comment s) (4)	% Removal Rate	L/STMP Effluent Freq	PQLs review		
										PQL from L/STMP	unit	Comments
	BOD											
	TSS											
	NH3											
	Arsenic											
	Beryllium(5)											
X	Cadmium(1)			X								
X	Chromium(1)			X								
X	Copper(1)			X								
	Cyanide											
X	Lead(1)			X								
	Mercury											
	Molybdenum											
X	Nickel(1)			X								
	Silver											
	Selenium											
X	Zinc(1)			X								
	Sludge Flow to Disposal											
	% Solids to Disposal											
	TN											
	TP											
	VOCs											
	...											
	POCs1											
	POCs2											
	...											
	POCs1											
	POCs2											

Footnotes:
 (1) Always in the LTMP/STMP
 (2) Only in LTMP/STMP if sludge land app or composte (dif POCs for incinerators)
 (3) Only in LTMP/STMP while SIU still discharges to POTW/
 (4) Only in LTMP/STMP when pollutant is still of concern to POTW/
 (5) Only in LTMP/STMP if incinerated
 Please use blue font for the info updated by pw
 Please use red font for POCs that need to be added to L/STMP
 Please use orange font for POCs that may be removed from L/STMP





Updates in Progress (2021-2022)

General website updates

1. Guidance for written technical evaluation to update local limits
2. Language update:
 - a) **Previously** Uncontrollable/Uncontrolled. **Now** Unregulated.
 - b) **Previously** PERCS. **Now** Municipal Permitting Unit (Disclaimer)
3. Modify Long-Term and Short-Term Monitoring Plan Models to include recommended 2017 PQLs
4. Update Website to include updated IWS Form for submittal
5. Continue to update POC Review Form (Included as fact sheet attachment)
6. HWA training materials on the website will be updated
 - a) Updates to Pharmaceuticals and OCPSF HWA



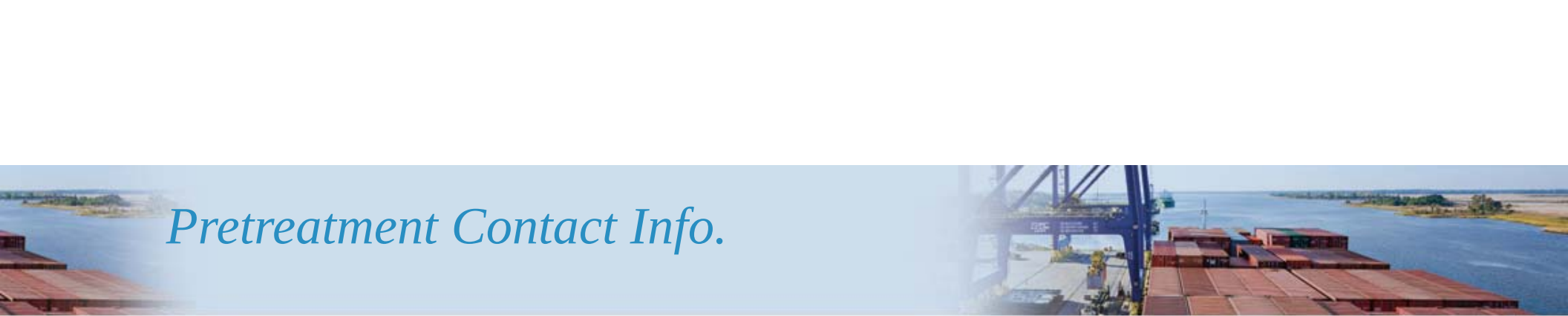
Challenges in 2021-2022



1. Pretreatment Program Review Timeliness. Backlog of projects/requests
 - Focus on
 - SIU permits
 - IWS (review to continue after NCPC Meeting), and
 - HWA's
 - Anyone is free to contact supervisor & staff for additional assistance

2. We'll continue to ask for more information due to new initiatives (e.g., Emerging Pollutants)





Pretreatment Contact Info.

Keyes McGee and Charlie Miller will typically be acknowledging receipt of email submissions for Pretreatment

Contact: keyes.mcgee@ncdenr.gov
charlie.miller@ncdenr.gov

Michael Montebello, Supervisor, Municipal Permitting Unit

- Michael.Montebello@ncdenr.gov
- 919-707-3624 (office)
- 803-791-9921 (cell)

