



September 2022

State Pretreatment Program Update
NPDES Permitting Branch



NPDES Permitting Branch

NPDES Permitting Branch
Michael Montebello, Branch Chief



NPDES Municipal Permitting Unit

[NPDES, Pretreatment, Collection Systems-alternative sewers, variances, flow adjustments, assist with compliance & Fast Track Programs]

(includes formerly PERCS Unit)

Vacant Position, Supervisor

NPDES Industrial Permitting Unit

[NPDES industrial major/minor, special technical issues, modeling evaluations, ATC, speculative limits.]

Doug Dowden,
Supervisor

Compliance & Expedited Permitting Unit

[NPDES Minor, general permits and enforcement]

John Hennessy,
Supervisor



Municipal Unit Staffing in Central Office

NPDES, Pretreatment & Collection Systems Program Areas



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

Nick Coco, P.E.
NPDES Permitting, including ARPA Projects
Special Projects

Octavio Henriquez
Pretreatment program oversight
Pretreatment review & approval actions

Kristin Litzenberger
NPDES Permitting Section Special Projects
NPDES modeling and speculative limits

Marquan Martin
Sewer extension permitting

Keyes McGee, E.I.
Pretreatment program oversight/compliance
Pretreatment review & approval actions
Pretreatment Training & Assistance

Charlie Miller, P.E.
Sewer extension/Alternative sewer permitting
Fast track permitting program oversight
Delegated permitting program oversight
Variance, flow reductions

Matthew Nevills
Special Projects
NPDES & Pretreatment Program Support

Gary Perlmutter
NPDES Permitting (Municipal Majors)
Special Projects

Al Woodall
Pretreatment program oversight
Pretreatment review & approval actions

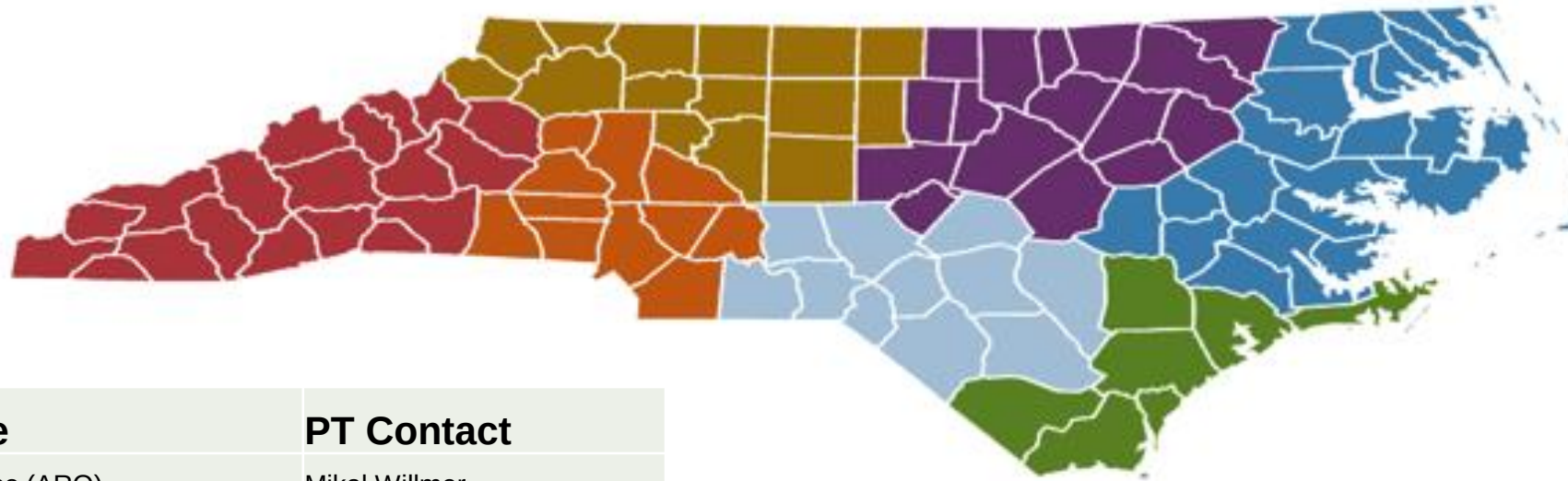
Diana Yitbarek
NPDES Permitting (Municipal Majors)
Pretreatment program IWS, LTMP, HWA Review

Pending Municipal Unit Staff (TBD)
Engineer 3 – Collection Systems
Engineer 2 – ARPA Collections Systems
Engineer 1 –NPDES
Engineer 1 – NPDES
Engineer 2 – NPDES Nutrients Permitting
Environmental Specialist 1 – BIMS, Project Tracking
New Administrative Assistant – ARPA

FirstName.LastName@ncdenr.gov



Regional Offices' Pretreatment Staff



Red: Asheville Regional Office
Brown: Winston-Salem Regional Office
Light Blue: Fayetteville Regional Office
Blue: Washington Regional Office

Orange: Mooresville Regional Office
Purple: Raleigh Regional Office
Green: Wilmington Regional Office

FirstName.LastName@ncdenr.gov

Regional Office	PT Contact
Asheville Regional Office (ARO)	Mikal Willmer
Asheville Regional Office (ARO)	Lauren Armeni
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)	Tricia Lowery
Winston-Salem Regional Office (WSRO)	Jim Gonsiewski

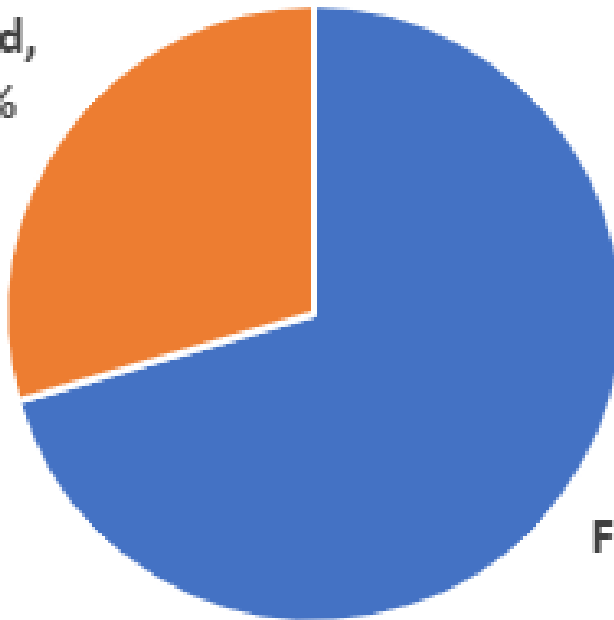


Pretreatment Programs and Significant Industrial Users (SIU's) in 2022



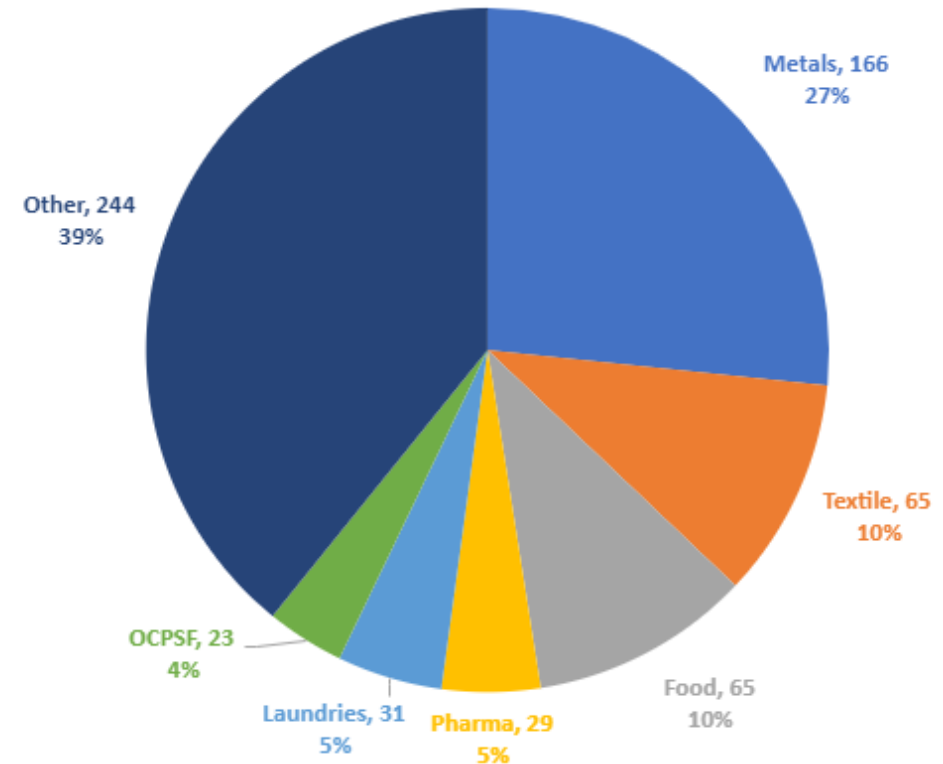
115 Programs

Modified,
34, 30%



Full, 81, 70%

2021 - 2022 SIU COUNT = 623



Approximately 47% of North Carolina's SIUs are CIUs



Pretreatment & NPDES Programs Goals

Consistency between both Programs (PT & NPDES) - a work in progress.

Example: LOCAL LIMITS EVALUATION, standard language in all Pretreatment approval letters

Regardless of this approval action today, within 180 days of the effective date of any reissued NPDES permit (or any subsequent NPDES permit modification) the Permittee would be required to submit to the Division a written technical evaluation of the need to revise local limits (i.e., an updated IWS, or documentation of why one is not needed). This action may include revising, updating or adding to the list of Significant Industrial Users (SIU's).



Pretreatment & NPDES Programs Goals

Q& A Supplement for the March 2022 PQL Data Handling Letter

- NC Pretreatment Consortium responded, June 2022
- DEQ Staff is seeking further input from NC-PC in order to complete the Q&A document.



Pretreatment & NPDES Programs Goals

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

NPDES renewals are containing permit conditions for emerging compounds

- 1,4 Dioxane – Permitting Strategy
- PFAS – Follow EPA Updates

Submission of Chemical Addendum with NPDES application as required by Session Law 2018-5, Senate Bill 99, Section 13.1.(r)



Recommended Practical Quantitation Limits PQLs

Compound	PQL**	Unit	Method***
Arsenic*	2.0	ug/l	
Cadmium*	0.50	ug/l	
Chromium*	5.0	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*	1.0	ug/l	
Zinc	10.0	ug/l	

*Lower than the Model L/STMP

** 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 2022

Industrial Waste Survey (IWS)

- Pretreatment staff will provide an **Industry Select** spreadsheet of manufacturer, suppliers and industrial service providers for your respective POTW's service area upon request!
- Improved IWS Form on the Industrial Waste Survey Portal Page:
 - Include **all** Industrial, Commercial, and Institutional Users (ICI), e.g., Landfills
 - Include Source of Information
 - Include Primary SIC Code, NAICS and 40 CFR
 - If Process Water is Pumped & Hauled, add destination information and provide Regional Pump & Haul approval
 - For 433 and 413 industries, include the completed 40 CFR 433/413 Verification Form



Updates in the Industrial Waste Survey Form (IWS) for Submittal

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
1																					
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Further checklist improvements make it easier to document industrial identification and classifications

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Pretreatment Program Updates 2022

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



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

Pollutants of Concern (POC) Review Form as NPDES fact sheet attachment

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



Pollutants of Concern Review Form

(Find it in NPDES permit fact sheet attachment)

PW: Find L/STMP document, HWA spreadsheet, DMR, previous and new NPDES permit for next section.

POC in L/STMP	Parameter of Concern (POC) Check List	New NPDES POC	Previous NPDES POC	Required by EPA PT(1)	POC due to Sludge (2)	POC due to SIU (3)	POTW POC (4)	% Removal Rate	L/STMP Effluent Freq	NPDES Effluent Freq	PQLs review			Comment
											PQL from L/STMP, ug/l	Required PQL per NPDES	Recomm. PQL, ug/l	
☐	Flow	☐	☐			☐	☐							
☐	BOD	☐	☐			☐	☐							
☐	TSS	☐	☐			☐	☐							
☐	NH3	☐	☐			☐	☐							
☐	Arsenic	☐	☐		☐	☐	☐					2.0		
☐	Barium	☐	☐		☐	☐	☐							
☐	Beryllium(5)	☐	☐		☐	☐	☐							
☐	Cadmium(1)	☐	☐	☐	☐	☐	☐					0.5		
☐	Chromium(1)	☐	☐	☐	☐	☐	☐					10.0		
☐	Copper(1)	☐	☐	☐	☐	☐	☐					2.0		
☐	Cyanide	☐	☐		☐	☐	☐							
☐	Lead(1)	☐	☐	☐	☐	☐	☐					2.0		
☐	Mercury(5)	☐	☐		☐	☐	☐					0.001		
☐	Molybdenum	☐	☐		☐	☐	☐					10.0		
☐	Nickel(1)	☐	☐	☐	☐	☐	☐					5.0		
☐	Selenium	☐	☐		☐	☐	☐							
☐	Silver	☐	☐		☐	☐	☐					1.0		
☐	Zinc(1)	☐	☐	☐	☐	☐	☐					10.0		
☐	Sludge Flow to Disposal				☐	☐	☐							
☐	% Solids to Disposal				☐	☐	☐							
☐	Oil & Grease													
☐	TN	☐	☐											
☐	TP	☐	☐											
☐	PFAS 1633	☐	☐											
☐	1,4 Dioxane	☐	☐											
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☐		☐	☐											
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Footnotes:

(1) Always in the L/STMP due to EPA-PT requirement

(2) Only in L/STMP if listed in sludge permit

(3) Only in L/STMP while SIU still discharges to POTW

(4) Only in L/STMP when pollutant is still of concern to POTW

(5) In L/STMP, if sewage sludge is incinerated

Please use blue font for the info updated by you

Please use red font for POC that need to be added/modified in L/STMP sampling plan

Please use orange font to delete through for POC that may be removed from L/STMP POC list/sampling plan.

Blue shaded cell (D60:H82): Parameters usually included under that POC list

The updated POCs review form



Updates in Progress (2022-2023)

General website updates

- Guidance for written technical evaluation to update local limits
- Language update:
 - **Previously** Uncontrollable/Uncontrolled. **Now** Unregulated.
 - **Previously** PERCS. **Now** Municipal Permitting Unit (Disclaimer)
- Modify Long-Term and Short-Term Monitoring Plan Models to include recommended PQLs
- Updated Website to include updated IWS Form for submittal
- Updated POC Review Form (Included as fact sheet attachment)
- HWA training materials on the website will be updated
- Cross-Media Electronic Reporting Rule (CROMERR)





New Pretreatment Staff recently on-boarded for improvement of Program Review to reduce backlog of projects/requests.

- Current focus is on:
 - SIU permits
 - IWS, and
 - HWA's
- Please contact Pretreatment Staff for additional assistance

DWR is continuing to ask for more information about Emerging Pollutants!



Pretreatment Contact Info

Staff will acknowledge receipt of emailed Pretreatment submission

Pretreatment Staff:

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Keyes.Mcgee@ncdenr.gov (919) 707-3626

Al.Woodall@ncdenr.gov (919) 707-3608

Diana.Yitbarek@ncdenr.gov (919) 707-9130

Michael Montebello, NPDES Permitting Section Chief

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- 919-707-3624 (office)
- 803-791-9921 (cell)

