



September 2024

State Pretreatment Program Update *NPDES Municipal Unit*



NPDES Permit Branch

Michael Montebello, NPDES Branch Chief

Municipal NPDES Permitting Unit

Karen Preston, Supervisor New

[NPDES majors, minors with pretreatment, Pretreatment, Collection Systems-alternative sewers, variances, flow adjustments, assist compliance & Fast Track programs], Municipal speculative limits, modeling for POTW expansion]

Industrial NPDES Permitting Unit

Doug Dowden, Supervisor

Industrial Major Permits

Compliance and Expedited Permitting Unit

Position currently vacant

[NPDES minors, Water Treatment and General Permits, Compliance and SOC development, tax certifications]

ARPA Unit- Nick Coco, P.E., Supervisor

Municipal Major Permits

Municipal AtC Permitting

ARPA Collection Permitting

Continued Vacancies make processing and responding more complex.



NPDES Branch-Municipal Unit



Kristin Litzenberger (Spec Limits Lead)

Speculative Limits Development
Coordination with Modeling Unit
Assist with NPDES Permitting actions

Derek Denard

Speculative Limits Development
Coordination with Modeling Unit
Assist with NPDES Permitting actions including
some Industrial Permitting

Anjali Orlando

Speculative Limits Development
Coordination with Modeling Unit
Assist with NPDES Permitting actions

Environmental Program Manager II (vacant)

NPDES Permit Tracking
Collection System Permitting

Karen Preston, Supervisor, Municipal Unit (new September 2024)

NPDES Permitting & Pretreatment
Collection System Permitting

Gary Perlmutter

NPDES Permitting (Municipal Majors)
NPDES Permit Consistency Review
Special Projects (E.C. Tracking)

Engineer II (vacant)

NPDES Permitting (Municipal Majors)
Collection System Permitting

Engineer III (vacant)

NPDES Permitting (Municipal Majors)
Collection System Permitting

Engineer III (vacant)

NPDES Permitting (Municipal Majors)
Collection System Permitting

Matthew Nevills

Document Management
Assist with collection system permitting
Special Projects (Emerging Pollutant Tracking)

Keyes McGee, Pretreatment Coordinator

Pretreatment program oversight/compliance
Training, Pretreatment Assistance

Octavio Henriquez, Pretreatment Coordinator

(Leaving Soon for PWS/Technical Services Engineering position)
Pretreatment program oversight/compliance
Training, Pretreatment Assistance

Al Woodall, Pretreatment Coordinator

Pretreatment program oversight/compliance
Training, Pretreatment Assistance

Natalie Gorenssek, Pretreatment Coordinator

Pretreatment program oversight/compliance
Training, Pretreatment Assistance

Stephanie Zorio, PhD (PFAS Coordinator)

Pretreatment program oversight/PFAS
Pretreatment Assistance



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NPDES Branch- ARPA Unit (new)

Nick Coco, P.E (ARPA Unit Supervisor)

NPDES Permitting (Municipal Majors)
ATC Municipal wastewater system permitting
NPDES Consistency Review

Zac Lentz, P.E

Sewer extension/Alternative sewer permitting
Delegated permitting program oversight
Variance, flow reductions

Will Schneider - Engineer I (new)

NPDES permitting
Collection System General Permits (WQCS)

Andrew Girgis

Collection System General Permits (WQCS)
Sewer extension permitting
ATC Municipal wastewater system permitting

Temporary Staff

Dale Crisp, P.E.

Sewer extension/Alternative sewer permitting
Variance reviews, flow reductions

These ARPA staff may be working on a NPDES permit renewal, modification or expansion. They also may be addressing ATC permitting for wastewater treatment systems and collection system permitting. Primarily ARPA related actions.

Saad Masood

NPDES Permitting (Municipal Majors)
ARPA Construction

Alice Wessner

ARPA Projects
Collection System Projects
Collection System General Permits (WQCS)

Ori Tuvia

NPDES Permitting (Municipal Majors)
Collection System Permitting
ATC Municipal wastewater system permitting

Urva Patel

NPDES Permitting (Municipal Majors)
ARPA Projects
NPDES Permit Tracking

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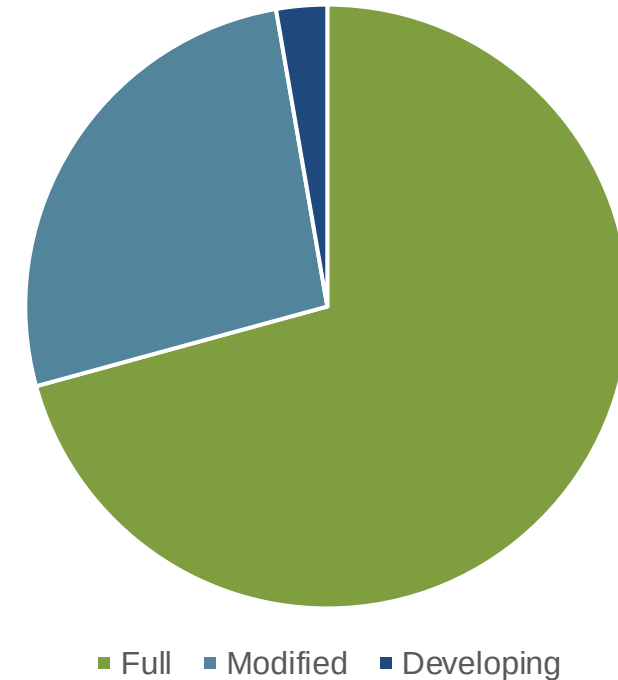


2024 Pretreatment Count in North Carolina



- 115 Pretreatment programs
- 607 Active SIUs
 - 24% Metals
 - 10% textile
 - 10% food processors
 - 5 % pharmaceuticals
 - 5% laundries
 - 4% OCPSF
 - 42% Other

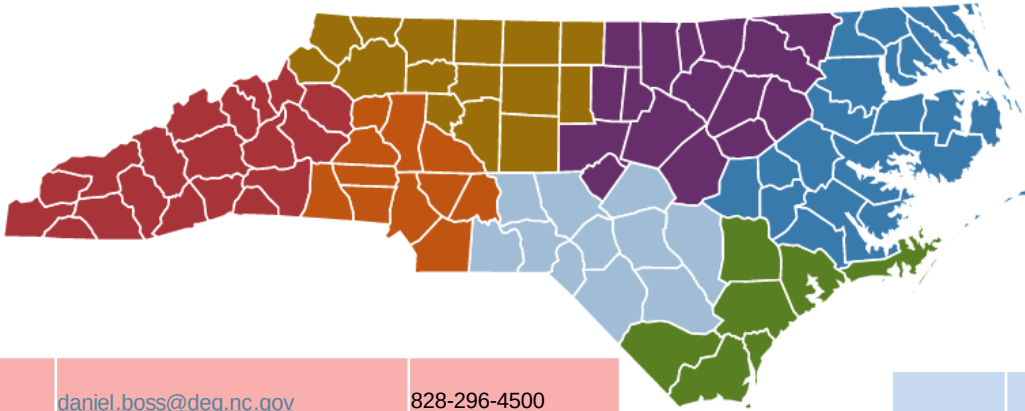
115 Pretreatment Programs



Approximately 45% of North Carolina's SIUs are Categorical Industrial Users (CIUs)



Pretreatment Regional Staff



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

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FRO	Mark Brantley	mark.brantley@deq.nc.gov	910-433-3327
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WIRO	Ann Marie Baxter	Ann.Marie.Baxter@deq.nc.gov	910-796-7333
WARO	Robert Bullock	robert.e.bullock@deq.nc.gov	252-948-3843
WARO	Victoria Herdt	victoria.herd@deq.nc.gov	252-946-6481

NEW Emails: first.last@deq.nc.gov



Pretreatment & NPDES Programs Goals

Consistency in decisions between Pretreatment & NPDES Permitting

Resolve PQL Issues

- a. Update Long/Short Term Monitoring Plan (L/STMP) Models (In progress)
- b. Follow Pollutant of Concern (POC) Review

Address new issues under review by DEQ (having ready access to recent applications and sampling data (if needed))



Achievements for 2023 - 2024

- Industrial User Permit Renewals – 154
- Industrial User Permit Renewals Modifications - 129
- Industrial User Permit Renewals IUP Drops - 20
- Industrial User Permit Renewals IUP New – 33



Achievements for 2023 - 2024

- Sewer Use Ordinance – 3
- LTMP/STMP – 11
- IWS - 11
- Enforcement Response Plans - 4
- PT Developing Programs – 4
- Assisted in IJA – 1



Projects Status

- Solution to Replace FileMaker Pro (More access to program information for POTWs and Regional Office)
- Updating to Comprehensive Guide Review
 - Staff is currently conducting a formatting update to both the Comprehensive Guide and the Pretreatment portion of DWR website.
 - Once formatting is complete, DWR will be reaching out to the NC-PC for members to give input on the Comprehensive Guide content changes that are needed.



FileMaker Pro Replacement

Dynamics 365

Pretreatment

SANDBOX

New look

Home

Recent

Pinned

Program

Programs

Program Activities

PAR

WWTP

WWTP

WWTP Activities

SIU

Contacts

Constituent Requests

P Pretreatment

Active WWTPs

Filter by keyword

☐	WWTP Name ↑	Program Name ↑	County	Permit Numb...	Is Prim...	Status
☐	Anson County Regional	Anson County	Anson	NC0041408	Yes	Active
☐	Archie Elledge	Winston-Salem	Forsyth	NC0037834	Yes	Active
☐	Bessemer City is an SIU of TRU's ...	Bessemer City	Gaston	WQCS00107 (...)	Yes	Active
☐	Big Buffalo	Sanford	Lee	NC0024147	Yes	Active
☐	Brevard WWTP	Brevard	Transylvania	NC0060534	Yes	Active
☐	Burgaw is an SIU of Wallace WWTP	Burgaw	Pender	WQCS00150 (...)	Yes	Active
☐	City of Asheboro	Asheboro	Randolph	NC0026123	Yes	Active
☐	City of Belmont	Belmont	Gaston	NC0021181	Yes	Active
☐	City of Goldsboro	Goldsboro	Wayne	NC0023949	Yes	Active
☐	City of Graham	Graham	Alamance	NC0021211	Yes	Active
☐	City of Hendersonville	Hendersonville	Henderson	NC0025534	Yes	Active

Rows: 143



FileMaker Pro Replacement

Dynamics 365

Pretreatment

SANDBOX

New look

+

?

<

Save

Save & Close

New

Deactivate

Delete

Refresh

Check Access

Assign

Flow

Run Report

Share

Typicalville - Saved

Program

Program

PAR

Activities

Contacts

Related

Program Name

* Typicalville

Region

WSRO

Approval Date

6/30/1983

DWR Central Office Contact

Pretreatment Staff

Status

* Active

DWR Regional Office Contact

Jenny Graznak

Status Reason

* Full

Legal Name

Typicalville

Program SIUs

6

Date Inactive

Last updated:

9/13/2024 2:44 PM

Modified By

Thomas McGee

Program CIUs

3

Modified On

9/13/2024 2:45 PM

WWTPs

New WWTP

Refresh

WWTP Name	Program Name	County	Permit Number	Is Pri...	Status
Town of Typicalville WWTP	Typicalville	Wake	NC0012345	Yes	Active

Rows: 1

ProjectTimeline

Search timeline

Enter a note...



FileMaker Pro Replacement

Dynamics 365

Pretreatment

SANDBOX

New look

+

?

Save

Save & Close

New

Deactivate

Delete

Refresh

Check Access

Assign

Flow

Run Report

Share

Typicalville - Saved

Program

Program

PAR

Activities

Contacts

Related

New Program Activity

Refresh

Flow

Run Report

☐	Program Activity Name	Program Activity Type	Received Date	Due Date	Days until Due	Activity Timeframe	Assignee	Status	Status Reason
☐	PA-000499	Headworks Analysis	1/3/2020	2/1/2020		90 Days	Alfalfa Woodall	Inactive	Completed
☐	PA-000496	Industrial Waste Survey		6/1/2022			Michael Marcin	Inactive	Completed
☐	PA-000497	Program Reactivation	12/11/2017			30 Days	Aniya Sharpe	Inactive	Completed
☐	PA-000498	ERP	12/11/2017	3/1/2018	-2,388		Octavio Henriquez	Active	Assigned
☐	PA-000500	Industrial Waste Survey	5/22/2019	6/1/2019	-1,931	90 Days	Thomas McGee	Active	Assigned

Rows: 5

Pretreatment & NPDES Programs Goals Municipal Unit 2025

- **Address backlog of Pretreatment Reviews**
 - **Increase staffing & replace staff lost to other Divisions**
 - **Work on Streamlining process**
- **Addressing NC-PC Concerns and Backlog:**
 - **It is the goal of the Division to provide feedback and details on future management of concerns that the NC-PC has raised. With new staff changes, discussion and planning of solutions to continue addressing the backlog are underway.**

Note: It is important that Pretreatment Coordinator (POTW) contact information is up to date with the Division so that communication through the End of Year Mailing is effective.





Pretreatment Program Review Timeliness

Backlog of projects/requests

- With continued focus on
 - SIU permits
 - IWS and HWA's

Processing data from PFAS Sampling



Pretreatment Program Updates 2024

HWA Review

- Obtain Water Quality Standards (WQS) from Reasonable Potential Analysis (RPA)
 - [Chronic concentration value]
- Variable/Inconsistent PQLs

Pollutants of Concern (POC)

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



Updates for CROMERR

Charlotte Water

- Received the first EPA CROMERR approval in North Carolina!
- DWR issued approval for Charlotte Water's Pretreatment Program Modification for CROMERR - 11/01/2024.

City of Greensboro

- CROMERR Application Package submitted to EPA – 03/04/2024.
- DWR is awaiting EPA review response.

[Cross-Media Electronic Reporting Rule \(CROMERR\) Link](#)



PFAS and Method 1633

EPA Issues Guidance to States to Reduce Harmful PFAS Pollution

New EPA memo provides direction under NPDES permitting program to restrict PFAS at their source

December 6, 2022

Contact Information

EPA Press Office (press@epa.gov)

WASHINGTON — Today, the U.S. Environmental Protection Agency (EPA) released a memorandum to states that provides direction on how to use the nation's bedrock clean water permitting program to protect against per- and polyfluoroalkyl substances (PFAS). The guidance released today, which outlines how states can monitor for PFAS discharges and take steps to reduce them where they are detected, is part of the Agency's holistic approach to addressing these harmful forever chemicals under EPA's [PFAS Strategic Roadmap](#).

This action is a critical step in EPA's efforts to restrict PFAS at their source, which will reduce the levels of PFAS entering wastewater and stormwater systems and ultimately lower people's exposure to PFAS through swimming, fishing, drinking and other pathways.

"EPA is following through on its commitment to empower states and communities across the nation to address known or suspected discharges of PFAS," **said EPA Assistant Administrator for Water Radhika Fox**. "Today's action builds upon successful and innovative efforts already used by several states to safeguard communities by using our Clean Water Act permitting program to identify and reduce sources of PFAS pollution before they enter our waters."

The memorandum, [Addressing PFAS Discharges in National Pollutant Discharge Elimination System \(NPDES\) Permits and Through the Pretreatment Program and Monitoring Programs](#), will align wastewater and stormwater NPDES permits and pretreatment program implementation activities with the goals in EPA's [PFAS Strategic Roadmap](#). The memo recommends that states use the most current sampling and analysis methods in their NPDES programs to identify known or suspected sources of PFAS and to take actions using their



PFAS and Method 1633 (January 2024)



Office of Water

www.epa.gov

January 2024

Method 1633

Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS

Laboratory Certification Rule
15A NCAC 02H .0804 and
Regulatory Impact Analysis

Adds Per- and polyfluoroalkyl substances (PFAS) be added as a parameter to 15A NCAC 02H .0804 (d)

<https://edocs.deq.nc.gov/WaterResources/DocView.aspx?dbid=0&id=3346614>



PFAS and Method 1633

Industry categories known or suspected to discharge PFAS from the **EPA PFAS Strategic Roadmap** included:

- Organic chemicals, plastics & synthetic fibers (OCPSF)

- Metal finishing; electroplating

- Electric and electronic components

- Landfills

- Pulp, paper & paperboard

- Leather tanning & finishing

- Plastics molding & forming

- Textile mills

- Paint formulating

- Airports

This is not an exhaustive list and additional industries may also discharge PFAS.



PFAS Data Submission Spreadsheet

DWR's Standardized Spreadsheet

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
Analyte Name	Analyte Acronym	CAS Number	Parameter Code	Date	Units	Result	Qualifier Type	Qualifier Value	Location	Method Used	Laboratory	Regional Office	Permit Type	Permit Number	Permittee Name	River Basin	Grab/Composite	DWR/Permittee	
Perfluorobutanoic acid	PFBA	375-22-4	51522																
Perfluoropentanoic acid	PFPeA	2706-90-3	51623																
Perfluorohexanoic acid	PFHxA	307-24-4	51624																
Perfluoroheptanoic acid	PFHpA	375-85-9	51625																
Perfluorooctanoic acid	PFOA	335-67-1	51521																
Perfluorononanoic acid	PFNA	375-95-1	51626																
Perfluorodecanoic acid	PFDA	335-76-2	51627																
Perfluoroundecanoic acid	PFUnA	2058-94-8	51628																
Perfluorododecanoic acid	PFDoA	307-55-1	51629																
Perfluorotridecanoic acid	PFTriDA	72629-94-8	51630																
Perfluorotetradecanoic acid	PFTeDA	376-06-7	51531																
Perfluorobutanesulfonic acid	PFBS	375-73-5	52602																
Perfluoropentanesulfonic acid	PFPeS	2706-91-4	52610																
Perfluorohexanesulfonic acid	PFHxS	355-46-4	52605																
Perfluoroheptanesulfonic acid	PFHpS	375-92-8	52604																
Perfluorooctanesulfonic acid	PFOS	1763-23-1	52606																
Perfluorononanesulfonic acid	PFNS	68259-12-1	52611																
Perfluorodecanesulfonic acid	PFDS	335-77-3	52603																
Perfluorododecanesulfonic acid	PFDoS	79780-39-5	52632																
1H,1H,2H,2H-Perfluorohexane sulfonic acid	4:2FTS	757124-72-4	52607																
1H,1H,2H,2H-Perfluorooctane sulfonic acid	6:2FTS	27619-97-2	52608																
1H,1H,2H,2H-Perfluorodecane sulfonic acid	8:2FTS	39108-34-4	52609																
Perfluorooctanesulfonamide	PFOSA	754-91-6	51525																
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8	52641																
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2	52642																
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9	51644																
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6	51643																
N-methyl perfluorooctanesulfonamidoethanol	NMeFOSE	24448-09-7	51642																
N-ethyl perfluorooctanesulfonamidoethanol	NEtFOSE	1691-99-2	51641																
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6	52612																
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4	52636																
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1	PF002																
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5	PF006																
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6	52626																
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid	9Cl-PF3ONS	756426-58-1	PF003																
11-Chloroicosadecafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUdS	763051-92-9	PF004																
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7	52629																
3-Perfluoropropyl propanoic acid	3:3FTCA	356-02-5	PF001																
2H,2H,3H,3H-Perfluorooctanoic acid	5:3FTCA	914637-49-3	PF007																
3-Perfluoroheptyl propanoic acid	7:3FTCA	812-70-4	PF005																



NPDES Municipal Permitting Unit

Pretreatment Staff

- **Karen Preston - NPDES Municipal Permitting Unit Supervisor**
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Central Office Pretreatment Staff

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