

Association of Clean Water Administrators

2023 National Pretreatment Coordinators Workshop

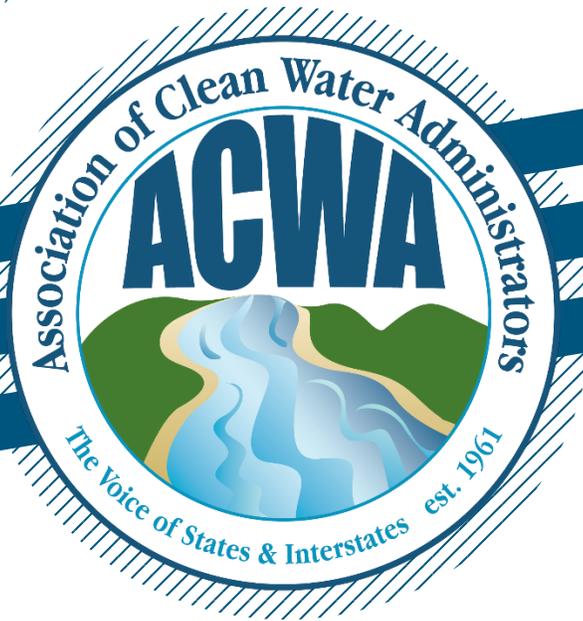
May 15 – 16, 2023

Boise, Idaho

Purpose: This meeting is intended to help support states and EPA to build staff capacity, identify challenges & barriers to pretreatment program implementation, highlight opportunities for program improvement & enhancement, showcase pretreatment program innovations, assist with analysis of training, guidance, tools, and other support material needs, improve administrative efficiencies, clarify roles and responsibilities, build strong linkages to other programs, improve data management, identify program areas where targeted technical assistance would be most beneficial, and attempt to solve some of the most intractable pretreatment program issues.

Attendees:

- State and EPA staff involved in managing and overseeing pretreatment programs;
- State and EPA staff involved with drafting and overseeing permits;
- Partnering state/federal agency staff that provide technical and/or regulatory assistance;
- Invited guests as appropriate;



SPECIAL THANKS TO THE PLANNING COMMITTEE:

Adam Bonomo (TN), Steve Caspers (KS), Rebecca Christopher (EPA), Richard Douglas (WI), Julia Faas (IA), Margaret Green (EPA), Jan Pickrel (EPA), Scott Ramsey (AL), Jen Robinson (UT), and Heidi Travers (RI).

This meeting is only open to States, EPA co-regulators, and invited guests.

7:00 AM – 8:00 AM

BREAKFAST ON YOUR OWN

Hotel provides free hot breakfast and coffee.

8:00AM – 8:30 AM

REGISTRATION

8:30 AM – 8:45 AM

WELCOME & OPENING REMARKS

Sean Rolland, Association of Clean Water Administrators

Jan Pickrel, Office of Wastewater Management, Environmental Protection Agency

8:45 AM – 9:30 AM

NPDES PRETREATMENT LANGUAGE – WHAT IS REQUIRED?

In this session EPA will discuss regulatory requirements associated with specific NPDES permit language developed and recommended, ensuring all regulatory expectations have been communicated to the permittee and the public. States will be encouraged to review their own permits to determine adequacy and/or functional equivalency.

Al Garcia, Region 8, Environmental Protection Agency

9:30 AM – 10:00 AM

ELECTRONIC REPORTING: WHAT IS EXPECTED IN THE PRETREATMENT PROGRAM AND WHEN?

In this session EPA will discuss the status of the NPDES eReporting Rule, expectations for the pretreatment program including annual reports, Single Event Violation requirements, and current opportunities to provide feedback to EPA on electronic reporting.

Trish Nguyen, Office of Compliance, Office of Enforcement and Compliance Assurance, Environmental Protection Agency

10:00 AM – 10:30 AM

BREAK

10:30 AM – 12:00 PM

TOPICAL BREAK OUT SESSIONS

Rooms and/or tables will be made available for participants to group together to discuss topical issues and challenges. Each room/table will report out after the break.

1. Participants in the session break-out rooms should talk about obstacles and challenges, differing interpretations, tips, tricks, and tools, and possible solutions.
2. The group should also discuss ways EPA HQ &/or Regions might be helpful in the future.
3. Individuals should take breaks as needed.
4. At the 40-minute mark participants should switch topics.



Room or Table

Topical Break Out 1: Q&A For Effluent Guidelines

Session 1 & 2: What categories are most challenging in your states(s)? What areas of the regulations could benefit from updates? EPA will also share effluent guidelines proposed for update.

Session 1 Facilitators:

Doruntine Rexhepi, Office of Science and Technology,
Environmental Protection Agency
Sean Dempsey, Office of Science and Technology, Environmental
Protection Agency
Rebecca Christopher, Office of Wastewater Management,
Environmental Protection Agency

Session 2 Facilitators:

Doruntine Rexhepi, Office of Science and Technology,
Environmental Protection Agency
Sean Dempsey, Office of Science and Technology, Environmental
Protection Agency
Rebecca Christopher, Office of Wastewater Management,
Environmental Protection Agency

Room or Table

Topical Break Out 2: Approval Authority

Session 1: Discuss the responsibilities of the Approval Authority to review pretreatment program documents, 40 CFR 403.8 (f)(1) through (6), from Approved Pretreatment Programs and unapproved areas. Also, answer any questions regarding the requirements of 40 CFR 403.18 for Approved Pretreatment Programs to submit changes.

Session 1 Facilitators:

Margaret Green, Office of Wastewater Management,
Environmental Protection Agency
Al Garcia, Region 8, Environmental Protection Agency

Session 2: Discuss the responsibilities of the Approval Authority with focus on 403.10(f) implementation and unique hybrid approaches to pretreatment implementation where states implement pretreatment but are not officially a 403.10(e) state. How to be an approval/control authority in unapproved POTW service areas, where typically one finds small POTWs?

Session 2 Facilitators:

Margaret Green, Office of Wastewater Management,
Environmental Protection Agency
Al Garcia, Region 8, Environmental Protection Agency



Room or Table

Topical Break Out 3: Compliance Assistance and Monitoring

Sessions 1 & 2: What sort of compliance assistance does your state provide? How does your state allocate resources to conduct inspections, and how do they target facilities in order to optimize output (e.g. enforcement) for input of resources (e.g. time, \$\$)? Come ready to share targeting protocols and examples of compliance assistance your state provides.

Session 1 Facilitators:

Barbara VanTil Office of Enforcement and Compliance Assistance, Environmental Protection Agency

Session 2 Facilitators:

Barbara VanTil Office of Enforcement and Compliance Assistance, Environmental Protection Agency

Room or Table

Topical Break Out 4: Pretreatment Enforcement

Session 1 & 2: Discuss enforcement response plans, examples of how states have modified the model ERP, and identify examples of where an ERP was used successfully. What unique situations have transpired in your state/region?

Session 1 Facilitators:

Steve Caspers, Kansas Department of Health and Environment
Lantz Tipton, Region 7, Environmental Protection Agency

Session 2 Facilitators:

Steve Caspers, Kansas Department of Health and Environment
Lantz Tipton, Region 7, Environmental Protection Agency

12:00 PM – 1:30 PM

LUNCH ON YOUR OWN OR WITH A GROUP

1:30 PM – 2:30PM

TOPICAL BREAKOUT REPORTS

(7-10 minutes each, 20+ minutes Q&A and Discussion)

2:30 PM – 3:00 PM

DATA MANAGEMENT: WHAT ARE PRETREATMENT PROGRAMS DOING WITH INFORMATION?

In this session states and EPA will discuss different approaches for using pretreatment data to improve their programs and the environment. Example topics might include violation prioritization, inspection targeting, relevant ECHO searches and dash boards, etc.

Richard Douglas, Wisconsin Department of Natural Resources
Al Garcia, Region 8, Environmental Protection Agency

3:00 PM – 3:30 PM

BREAK

3:30 PM – 4:15 PM

INSPECTOR TRAINING NEEDS



1634 I Street NW, Suite 750
Washington, DC 20006
(202) 756-0605
www.acwa-us.org

In this session states and EPA will discuss the recent ACWA survey and different approaches for providing training. EPA will also share tools, current training planned, and next steps for the program.

Barbara VanTil, Office of Compliance, Office of Enforcement and Compliance Assurance, Environmental Protection Agency

4:15 PM – 5:00 PM

HOT TOPIC – SUCCESSION PLANNING

In this session states and EPA will talk about some of their own personal challenges and approaches for addressing workforce changes, how to memorialize institutional knowledge, and how to train the next generation.

Facilitators:

Margaret Green, Office of Wastewater Management,
Environmental Protection Agency

Sean Rolland, Association of Clean Water Administrators

Rebecca Christopher, Office of Wastewater Management,
Environmental Protection Agency

5:00 PM

ADJOURN

Informal Evening Event to be Planned.



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7:00 AM – 8:00 AM

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8:30 AM – 9:15 AM

MINI-PRETREATMENT PROGRAM: WHAT ARE BEST PRACTICES?

In this session EPA will provide an overview of program requirements, identify key features of a robust program, discuss how the program can be protective, share best practices, and discuss oversight responsibilities.

Jan Pickrel, Office of Wastewater Management, Environmental Protection Agency

Jim Vinch, Office of Enforcement and Compliance Assistance, Environmental Protection Agency

9:15 AM – 10:00 AM

TRAINING AND TOOLS FOR MUNICIPAL/STATE PROGRAMS: WHAT ARE SOME TOOLS, CHECKLISTS, AND TRAINING IDEAS STATES CAN SHARE WITH ONE ANOTHER?

In this session states and EPA will provide examples of training, checklists, and other tools developed to assist their municipalities with pretreatment program implementation. There will also be a short discussion about using the MS Teams SharePoint for information and product sharing in the future.

Terry Alber, Idaho Department of Environmental Quality

Steve Caspers, Kansas Department of Health and Environment

Aron Possler, Region 3, Environmental Protection Agency

Margaret Green, Office of Wastewater Management, Environmental Protection Agency

10:00 AM – 10:30 AM

BREAK

10:30 AM – 11:30 AM

AUDITS VS INSPECTIONS: HOW ARE THEY SIMILAR, HOW ARE THEY DIFFERENT?

In this session states and EPA will share and discuss examples of how they conduct pretreatment compliance audits and pretreatment compliance inspections. Examples of checklists, templates, and other tools will be discussed, along with compliance monitoring practices, facility targeting, and oversight.

Moderated by Al Garcia, EPA Region 8, Environmental Protection Agency

Barbara VanTil, Office of Compliance, Office of Enforcement and Compliance Assurance, Environmental Protection Agency



Sarah Connors, Region 1, Environmental Protection Agency
Newton Ellens, Region 5, Environmental Protection Agency
Terry Alber, Idaho Department of Environmental Quality

11:30 AM – 12:00 PM

STATE PFAS UPDATES

In this session States will share some of the work they have been doing to address PFAS. States may also provide updates on pretreatment program status, case studies, legal authorities, challenges, implementation questions, and roadblocks.

Scott Ramsey, Alabama Department of Environmental Management
Pam Willard, Michigan Department of Environment, Great Lakes, and Energy (Invited)

12:00 PM – 1:15 PM

LUNCH ON YOUR OWN OR WITH A GROUP

1:15 AM – 1:45 PM

EPA PFAS UPDATES

In this session EPA will share some of the work they have been doing to address PFAS. Topics covered will include related memos, analytical methods, ELGs, biosolids, monitoring, other data collection efforts, and lab capacity. EPA and states may also provide updates on pretreatment program status, case studies, legal authorities, challenges, implementation questions, and roadblocks.

Doruntine Rexhepi, Office of Science and Technology,
Environmental Protection Agency
Jan Pickrel, Office of Wastewater Management, Environmental Protection Agency

1:45 PM – 2:30 PM

LOCAL LIMITS: WHAT IS EXPECTED OF AN APPROVAL AUTHORITY VS A CONTROL AUTHORITY?

In this session EPA will discuss requirements for local limits, how local limits should be evaluated, including responsibilities as an approval authority vs control authority. What are some best practices when looking at advanced local limits.

Margaret Green, Office of Wastewater Management,
Environmental Protection Agency
Chuck Durham, Director of Pretreatment Services, PG Environmental

2:30 PM – 3:15 PM

ENFORCEMENT: WHAT TOOLS CAN ASSIST WITH DECISION MAKING AND WHEN DOES ENFORCEMENT MAKE THE MOST SENSE AS A VIOLATION RESPONSE?

In this session states and EPA will discuss enforcement case studies and why the choice was made to use enforcement as a return to compliance response. Presenters may also discuss response plans, legal authority review,



violation designation, penalties, and other aspects of their enforcement response.

Jen Robinson, Utah Department of Environmental Quality
James T. Morgan, Office of Enforcement and Compliance
Assurance, Environmental Protection Agency

3:15 PM – 3:45 PM

BREAK

3:45 PM – 5:00 PM

PRETREATMENT JEOPARDY: ULTIMATE EDITION

In this session EPA HQ Staff will help divide up the group into four teams that will be competing to buzz in before their counter parts when they know the correct question-phrased-response for the categories provided. Teams will win points for each correct response and lose points for each incorrect response. Judges will be selected to decide which team buzzed in first and whether a response is “close enough.”

Host:
Margaret Green, Office of Wastewater Management,
Environmental Protection Agency

5:00 PM

WRAP UP AND ADJOURN

