North Carolina Department of Environment and Natural Resources
Division of Water Quality

Beverly Eaves Perdue
Governor

Chuck Wakild, P.E.
Director

Dee Freeman
Secretary

December 28, 2012

Subject: End of 2012 Pretreatment Mailing

Dear Pretreatment Professionals:

As we draw to the close of another great pretreatment year, I wanted to provide you an update on some issues, inform you on this year's upcoming workshops and distribute the Pretreatment Program Info Database sheets.

1) NC Pretreatment Professionals Honor Roll: In case you missed the Annual Pretreatment Conference held September 23-25th in Wrightsville Beach, this year's addition to the Honor Roll is Janna Scherer with Moore County.

2) Rulemaking: The following rule revisions became effective January 1, 2012. . More detail on both of these topics will be presented at the 2013 Pretreatment Annual Report Workshops.
   a. The requirement to judge compliance of monthly average and daily max limits for the same parameter separately.
   b. Compliance judgment for any IU in violation of .0903 (34) Parts (C), (D) or (H).

3) Model Sewer Use Ordinance (SUO): The revised NC DWQ Model SUO posted on our website in August of 2011reflects the revisions to NCAC 15A 02H .0900. Updated SUOs (in draft form is sufficient) are due to the Division by **December 31, 2012**. All POTWs must include the SUO Checklist updated August 2011 when submitting their SUO for review. Documentation of adoption and an attorney's statement are required at the time of adoption. Please contact PERCS pretreatment staff as soon as possible if your program has not yet submitted an updated SUO by this due date.

   In addition, review your Enforcement Response Plan (ERP) to determine if any changes are required due to changes made in the SUO. In particular, if you decided to take advantage of the change from 30 days to 45 days to be considered SNC for reporting your ERP may need revision.

4) Metal Standards Triennial Review: Request for review of the fiscal analysis prepared for proposed amendments to the Surface Water Quality Standards Rule is an information item on the Environmental Management Commission (EMC) agenda for January 10, 2013. Public Hearings are anticipated for early 2013.

5) Division Review of IUPs: The Division continues implementation of the streamlined permit review process. After attending the IUP workshop and a thorough Division review of three program IUPs, a permit writer may be approved to participate in this process. Permits submitted under this process are not subject to a full Division review. Benefits to the POTW include less paperwork to submit and immediate approval of your permits. More information is posted on the Permit Writing Guidance page of our website.

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Phone: 919-807-6300 \ FAX: 919-807-6492 \ PERCS Unit FAX: 919-807-6489 \ Customer Service: 1-877-623-6748
Internet: http://portal.ncdenr.org/web/wq/ PERCS Unit: http://portal.ncdenr.org/web/wq/swp/ps/pret
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6) Staff Assignments: Staff assignments remain the same. We continue to meet our goals for project review of 30 days for IUPs and SIU drops and 90 days for ERP, HWA, IWS, LTMP and SUO. Please note that PERCS has committed to a 30 day review of updated SUO submissions due to the 2011 Rule changes.

Monti Hassan, 919-807-6314 [monti.hassan@ncdenr.gov]: Chowan, Hiwassee, Little Tennessee, Lumber, Neuse, New, Roanoke, Yadkin
Sarah Morrison, 919-807-6310 [sarah.morrison@ncdenr.gov]: Broad, Cape Fear, Catawba, French Broad, Tar-Pamlico.

7) Workshops: The following workshops are planned for 2013. The invitation and directions for these workshops are posted on the Training page of our website: http://portal.ncdenr.org/web/wq/swp/ps/pret/training. Please register by emailing your pretreatment staff member and please do so early, as space is limited at each site.
Pretreatment Annual Report (PAR) – January 31 and February 5.
Headworks Analysis (HWA) – February 28, March 5, October 24 and October 29.
Industrial User Pretreatment Permit (IUP) Writing – Per demand. We presented 4 IUP workshops in 2012 and had great attendance. We will be working with pretreatment staff in the piedmont/western regions to schedule a workshop for those that have already expressed interest. Please contact your pretreatment staff member if you are interested in attending this workshop.

8) Pretreatment Program Info Database Sheets: Please review your attached program info sheet and historical SNC sheets, if applicable, and make necessary updates to any of the information presented. Send the corrected sheets back with your PAR, due **March 1, 2013**. If all the information was correct, please indicate that in your PAR. Especially note the due dates as this may be the only reminder you get. Please note:
   a. All pretreatment programs (full and modified) must submit a PPS form with their PAR per an EPA requirement of the State.
   b. Historical SNC sheets only list currently Active SIUs that had SNCs from 2005-2011.

9) Email Addresses: PERCS often uses email to send out mass mailings. To make this an effective and cost saving tool, we ask that you keep PERCS updated on your current email address as well as which staff member is the "primary" contact for your POTW - see "prim" field next to staff names on Program Info sheet, and email field below names.

As always, please contact your pretreatment staff member (as listed above) or me at 919-807-6383 [email: Deborah.Gore@ncdenr.gov] with any questions or comments.

Sincerely,

Deborah Gore, PERCS Unit Supervisor

Dg/dec2012_mass_mailing
Enclosures: Program Info sheet(s)
Historical SNC sheet(s), if applicable
Cc: PERCS Pretreatment Staff (via email)
All RO Pretreatment Contacts (via email)

North Carolina Department of Environment and Natural Resources
Division of Water Quality

Beverly Eaves Perdue
Governor

Coleen H. Sullins
Director

Dee Freeman
Secretary

December 29, 2011

Subject: End of 2011 Pretreatment Mailing

Dear Pretreatment Professionals:

As we draw to the close of another great pretreatment year, I wanted to provide you an update on some issues, inform you on this year's upcoming workshops and distribute the Pretreatment Program Info Database sheets.

10) Rulemaking: The Pretreatment Rules NCAC 15A 02H .0900 were approved by the Environmental Management Commission (EMC) on January 13, 2011 and were approved by the Rules Review Commission (RRC) on February 17 and March 17, 2011. The Rules are final and effective as of April 1, 2011.
    a. The requirement to judge compliance of monthly average and daily max limits for the same parameter separately becomes effective 1/1/2012.
    b. Compliance judgment for any industrial user in violation of .0903 (34) Parts (C), (D) or (H) becomes effective 1/1/2012.

    More detail on both of these topics will be presented at the Pretreatment Annual Report Workshops.

11) Model Sewer Use Ordinance (SUO): The 2011 NC DWQ Model SUO and checklist were posted on our website on August 12, 2011. The Model SUO includes many revisions to address the revisions to NCAC 15A 02H .0900 - Local Pretreatment Programs. All POTWs must include the SUO Checklist updated August 2011 when submitting their SUO for review. Unless otherwise specified, updated SUOs are due to the Division by **December 31, 2012**.

    Review your Enforcement Response Plan to determine if any changes are required due to changes made in the SUO. In particular, if you decided to take advantage of the change from 30 days to 45 days to be considered SNC for reporting your ERP may need revision.

12) Metal Standards Triennial Review: Work continues on preparation of the fiscal note. Public Hearings are anticipated for mid to late 2012.

13) Division Review of IUPs: In order to use available resources more effectively and recognizing the maturity and experience prevalent in the pretreatment program, the Division has implemented a process to streamline the Division review of Industrial User Pretreatment Permits (IUPs). After attending the IUP workshop and a thorough Division review of three program IUPs, a permit writer may be approved to participate in the streamlined permit review process. Permits submitted under this process will not be subject to a full Division review. Benefits to the POTW include less paperwork to submit and immediate approval of your permits. Information is posted on the Permit Writing Guidance page of our website.

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Internet: http://portal.ncdenr.org/web/wq/ PERCS Unit: http://portal.ncdenr.org/web/wq/swp/ps/pret
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14) Staff Assignments: Staff assignments have changed slightly. We continue to meet our goals for project review of 30 days for IUPs and SIU drops and 90 days for ERP, HWA, IWS, LTMP and SUO. Please note that the Division has committed to a 30 day review of updated SUO submissions due to the 2011 Rule changes.

Monti Hassan, 919-807-6314 [monti.hassan@ncdenr.gov]: Chowan, Hiwassee, Little Tennessee, Lumber, Neuse, New, Roanoke, Yadkin

Sarah Morrison, 919-807-6310 [sarah.morrison@ncdenr.gov]: Broad, Cape Fear, Catawba, French Broad, Tar-Pamlico.

15) Workshops: The following workshops are planned for 2012. The invitation and directions for these workshops are posted on the Training page of our website: http://portal.ncdenr.org/web/wq/swp/ps/pret/training. Please register by emailing your pretreatment staff member and please do so early, as space is limited at each site.
Pretreatment Annual Report (PAR) – January 19 and January 24.
Headworks Analysis (HWA) – February 9 and July 19.
Industrial User Pretreatment Permit (IUP) Writing – Per demand. We presented 6 IUP workshops in 2011 and had great attendance – 79 completed the class. We want to continue to present this class, but need to know which areas of the State to schedule. Please contact your pretreatment staff member if you are interested in attending this workshop.

16) Pretreatment Program Info Database Sheets: Please review your attached program info sheet and historical SNC sheets, if applicable, and make necessary updates to any of the information presented. Send the corrected sheets back with your PAR, due March 1, 2012. If all the information was correct, please indicate that in your PAR. Especially note the due dates as this may be the only reminder you get.
Note: historical SNC sheets only list currently Active SIUs that had SNCs in 2004-2010.

17) Email Addresses: PERCS often uses email to send out mass mailings (to save money on paper and postage). To make this an effective and cost saving tool, we ask that you keep PERCS updated on your current email address as well as which staff member is the "primary" contact for your POTW - see "prim" field next to staff names on Program Info sheet, and email field below names.

As always, please contact your pretreatment staff member (as listed above) or me at 919-807-6383 [email: Deborah.Gore@ncdenr.gov] with any questions or comments.

Sincerely,

Deborah Gore

Deborah Gore, PERCS Unit Supervisor

Dg/dec2011_mass_mailing
Enclosures: Program Info sheet(s)
Historical SNC sheet(s), if applicable
Cc: PERCS Pretreatment Staff (via email)
All RO Pretreatment Contacts (via email)

North Carolina Department of Environment and Natural Resources
Division of Water Quality

Beverly Eaves Perdue
Governor

Coleen H. Sullins
Director

Dee Freeman
Secretary

December 30, 2010

Subject: End of 2010 Pretreatment Mailing

Dear Pretreatment Professionals:

As we draw to the close of another great pretreatment year, I wanted to provide you an update on some issues, inform you on this year's upcoming workshops and distribute the Pretreatment Program Info Database sheets.

18) NC Pretreatment Professionals Honor Roll: In case you missed the Annual Pretreatment Conference held in October 2010, this year's addition to the Honor Roll is Cheryl Douglas with the City of Salisbury.

19) Rulemaking: The fiscal analysis was approved by the Office of State Budget and Management (OSBM) on May 5. The Rules were published in the State Register on June 1 and the Public Comment period was held from June 1 – August 2. The Public Hearing was held June 16 in the Ground Floor Hearing Room of the Archdale Building in Raleigh. The Rules were meant to go before the Environmental Management Commission (EMC) on November 18. However, the Rules were withdrawn in response to concerns raised by the NC Water Quality Association (NCWQA) in a November 12 correspondence. A meeting was held in Raleigh on December 7 to discuss these concerns, with follow-up comments to be submitted by December 10 in order to meet EMC deadlines. The final Report of Proceedings/Hearing Officers Report was published on the Pretreatment website on December 15. The Rules will go before the EMC on January 13, 2011 and the earliest possible effective date is March 1, 2011. Note the effective date for the changes to the Significant Noncompliance (SNC) definition would be delayed until July 1 in order to correspond with the six month assessment period. Please check the web-site regularly for updates and details, including an Implementation Guidance outlining exactly what the Division's expectations are for each Rule change, including a new Model Sewer Use Ordinance (SUO).

20) Metal Standards Triennial Review: DWQ is proposing dissolved metals, which represent the portion of the metal that is bioavailable (toxic) to aquatic life, to replace the existing total metals standards. Please check the Pretreatment website for guidance on how to evaluate the impact of the proposed standards on your Pretreatment Program as well as links to the websites for the Classification and Standards Unit for the standards themselves and their development and the NPDES Unit for Limits calculators. Check back to the web-site for updates as these Rules progress. Public Hearings are anticipated for early to mid 2011.

21) Division Review of IUPs: The Division has agreed to work out an agreement with the NCWQA and NCPC regarding the form and substance of DWQ's streamlined permit review policy. Numerous pretreatment programs have been in operation for many years and there are pretreatment professionals that are very capable of writing adequate IUPs. Cutting back on detailed reviews of each individual permit prepared by such Control Authorities would free up resources to devote to

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other tasks such as more training and more direct assistance to those Control Authorities that need it. Part of this process will involve the Control Authority attending a PERCS IUP Writing Workshop. PERCS is adding this workshop to its regular training schedule this coming year - see item 6 below for the 2011 dates. Stay tuned to the Pretreatment web-site for more details as the policy is developed.

22) Staff Assignments: Staff assignments remain the same. We continue to meet our goals for project review of 30 days for IUPs and SIU drops and 90 days for ERP, HWA, IWS, LTMP and SUO.
Dana Folley, 919-807-6311 [dana.folley@ncdenr.gov]: Catawba, Chowan, Lumber, Roanoke, New
Monti Hassan, 919-807-6314 [monti.hassan@ncdenr.gov]: Hiwassee, Little Tennessee, Neuse, Yadkin
Sarah Morrison, 919-807-6310 [sarah.morrison@ncdenr.gov]: Broad, Cape Fear, French Broad, Tar-Pam

23) Workshops: The following workshops are planned for 2011. The invitation and directions for these workshops are posted on the Training page of our website: http://portal.ncdenr.org/web/wq/swp/ps/pret/training. Please register by emailing your pretreatment staff member and please do so early, as space is limited at each site.
Pretreatment Annual Report (PAR) – February 3 and February 9.
Headworks Analysis (HWA) - February 24, March 1, July 21, and October 20.
Industrial User Pretreatment Permit (IUP) Writing – March 17 and 23 and June 16 and 22.

24) Pretreatment Program Info Database Sheets: Please review your attached program info sheet and historical SNC sheets and make necessary updates to any of the information presented. Send the corrected sheets back with your PAR, due March 1, 2011. If all the information was correct, please indicate that in your PAR. Especially note the due dates. This may be the only reminder you get.
Note: historical SNC sheets only list currently Active SIUs that had SNCs in 2004-2009.

25) Email Addresses: PERCS often uses email to send out mass mailings (to save money on paper and postage). To make this an effective and cost saving tool, we ask that you keep PERCS updated on your current email address as well as which staff member is the "primary" contact for your POTW - see "prim" field next to staff names on Program Info sheet, and email field below names.

As always, please contact your pretreatment staff member (as listed above) or me at 919-807-6383 [email: Deborah.Gore@ncdenr.gov] with any questions or comments.

Sincerely,

Deborah Gore, PERCS Unit Supervisor

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Enclosures: Program Info sheet(s)
Historical SNC sheet(s), if applicable
Cc: PERCS Pretreatment Staff (via email)
All RO Pretreatment Contacts (via email)

North Carolina Department of Environment and Natural Resources
Division of Water Quality

Beverly Eaves Perdue
Governor

Coleen H. Sullins
Director

Dee Freeman
Secretary

January 4, 2010

Subject: End of 2009 Pretreatment Mailing

Dear Pretreatment Professionals:

As we draw to the close of another great pretreatment year, I wanted to provide you an update on some issues, inform you on this year's upcoming workshops and distribute the Pretreatment Program Info Database sheets.

1) NC Pretreatment Professionals Honor Roll: In case you missed the Annual Pretreatment Conference held in August 2009, this year's addition to the Honor Roll is Leon Holt formerly with the Town of Cary.

2) Unit Supervisor: Deborah Gore has accepted the position of Supervisor for PERCS.

3) Rulemaking: The Draft Rules were published on the PERCS website in late August 2009. A few changes requested during the September and October 2009 Informational Meetings were incorporated. Most notable are removing collection systems and stormwater permits from list of POTW permits in the Pass Through and Interference definitions, and removing the Description of POTW Organization and the Description of Staffing and Funding Levels from the list of Pretreatment Program Elements that require Division approval to modify. The next step of the process is to complete the fiscal analysis, and we anticipate Public Hearings to be held in April 2010. Check the web-site for updates and details.

4) Metal Standards Triennial Review: DWQ is proposing dissolved metals, which represent the portion of the metal that is bioavailable (toxic) to aquatic life, to replace the existing total metals standards. The proposed standards and additional information may be found on the Classification and Standards Unit website: http://h2o.enr.state.nc.us/csu/trirev_SW.html. Public Hearings are anticipated for the summer of 2010. PERCS is looking into what these proposed standards will mean to POTWs.

5) Streamlining and Sewer Use Ordinance: Have you sent in your final adopted SUO? Check your most recent SUO Letter as well as the "Date Adopted" on your Program Info sheet to verify. If not, please do so as soon as possible.

6) IUP Workshop: The first IUP Writing workshop was held on June 23, 2009. Additional workshops are tentatively planned for the second half of 2010.

7) Staff Assignments: Staff assignments remain the same. Please note our email addresses have changed:
Dana Folley, 919-807-6311 [Dana.Folley@ncdenr.gov]:
Catawba, Chowan, Lumber, Roanoke and New
Monti Hassan, 919-807-6314 [Monti.Hassan@ncdenr.gov]:

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Hiwassee, Little Tennessee, Neuse and Yadkin
Sarah Morrison, 919-807-6310 [Sarah.Morrison@ncdenr.gov]:
Broad, Cape Fear, French Broad and Tar-Pam
We continue to meet our goals for project review of 30 days for IUPs and 90 days for ERP, HWA, IWS, LTMP and SUO.

8) Workshops: Three Pretreatment Annual Report (PAR) workshops are planned this year for January 26, January 28 and February 2, 2010.

Four Headworks Analysis (HWA) workshops are planned for February 11, February 16, May 6 and May 11, 2010.

The invitation and directions for these workshops are posted on the Training page of our website: http://h2o.enr.state.nc.us/percs/Pretreatment/PretreatmentWorkshop.html
Please register early as space is limited at each site.

9) Pretreatment Program Info Database Sheets: Please review your attached program info sheet and historical SNC sheets and make necessary updates to any of the information presented. Send the sheets back with your PAR, due March 1, 2010. If all the information was correct, please indicate that in your PAR. Especially note the due dates. This may be the only reminder you get.
Note the historical SNC sheets now only have current active SIUs.

10) Email Addresses: In the future, PERCS would like to be able to use email to send out mass mailings. To make this an effective and cost saving tool, we ask that you keep PERCS updated on your current email address. See the new field on the program information sheet.

As always, please contact your pretreatment staff member (as listed above) or me at 919-807-6383 [email:Deborah.Gore@ncdenr.gov] with any questions or comments.

Sincerely,

Deborah Gore, PERCS Unit Supervisor

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Enclosures:
Program Info sheet(s)
Historical SNC sheet(s), if applicable
Cc: PERCS Pretreatment Staff (via email)
All RO Pretreatment Contacts (via email)

Michael F. Easley, Governor

William G. Ross Jr., Secretary
North Carolina Department of Environment and Natural Resources

Coleen S. Sullins, Director
Division of Water Quality

December 22, 2008

Subject: End of 2008 Pretreatment Mailing

Dear Pretreatment Professionals:

As we draw to the close of another great pretreatment year, I wanted to provide you an update on some issues, inform you on this year's upcoming workshops and distribute the Pretreatment Program Info Database sheets.

1) NC Pretreatment Professionals Honor Roll: In case you missed the Annual Pretreatment Conference held in August 2008, this year's addition to the Honor Roll is Trudy McVicker from the City of Raeford.

2) Acting Supervisor: Jeff Poupart has accepted the position of Point Source Branch Manager. Until the position is filled on a permanent basis, Deborah Gore is the Acting Supervisor for PERCS.

3) Design HWA Workgroup, Phase 2: This phase of the workgroup was to study ammonia and phosphorus. The workgroup reconvened in January 2008. The Consortium solicited data from POTWs. The data was evaluated to determine if there were other viable options for calculating the allowable pollutant loading when the calculated pass-through calculations exceed design. The conclusion of the group was that the five options arrived at for BOD and TSS are also the best options for Ammonia and Phosphorus. Please see Division correspondence of 2/19/07 and 12/27/07 for further information on these options.

4) IUP Workshop: The Industrial User Permitting Writing guidance workgroup has met three times and conference called once. The first IUP Writing workshop is tentatively planned for spring 2009.

5) Rulemaking: The internal DWQ draft will be completed by March 2009. The next step will be a series of meetings with a small group of POTWs to get detailed input. If you would like to participate, or have suggestions on what to change, contact Dana Folley or the Consortium.

6) Streamlining: If you have not submitted your final adopted SUO, please do so as soon as possible.

7) Staff Assignments: Staff assignments remain the same:

Dana Folley, 919-807-6311 [Dana.Folley@ncmail.net]:
Catawba, Chowan, Lumber, Roanoke and New
Monti Hassan, 919-807-6314 [Monti.Hassan@ncmail.net]:
Hiwassee, Little Tennessee, Neuse and Yadkin
Sarah Morrison, 919-807-6310 [Sarah.Morrison@ncmail.net]:

Broad, Cape Fear, French Broad and Tar-Pam

We continue to meet our goals for project review of 30 days for IUPs and 90 days for ERP, HWA, IWS, LTMP and SUO.

8) Workshops: Due to the current budget constraints we are only planning one Pretreatment Annual Report (PAR) workshop this year for February 3, 2009 (see attached invitation). If there appears to be an overwhelming need for additional PAR workshops, we will add to the schedule.

   Three Headworks Analysis (HWA) workshops are planned for January 28, February 24 and May 12, 2009 (see attached invitation).

9) Pretreatment Program Info Database Sheets: Please review your attached program info sheet and historical SNC sheets and make necessary updates to any of the information presented. Send the sheets back with your PAR, due March 1, 2009. If all the information was correct, please indicate that in your PAR. Especially note the due dates. This may be the only reminder you get.
   Note the historical SNC sheets now only have current active SIUs.

10) Email Addresses: In the future, PERCS would like to be able to use email to send out mass mailings. To make this an effective and cost saving tool, we ask that you keep PERCS updated on your current email address. See the new field on the program information sheet.

As always, please contact your pretreatment staff member (as listed above) or me at 919-807-6307 [email:Deborah.Gore@ncmail.net] with any questions or comments.

Sincerely,

Deborah Gore

Deborah Gore, Acting PERCS Unit Supervisor

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Enclosures:
PAR Workshop Invitation
HWA Workshops Invitation
Program Info sheet(s)
Historical SNC sheet(s), if applicable
Cc with enclosures:
PERCS Pretreatment Staff
All RO Pretreatment Contacts

Michael F. Easley, Governor

William G. Ross Jr., Secretary
North Carolina Department of Environment and Natural Resources

Coleen S. Sullins, Director
Division of Water Quality

December 27, 2007

Subject: End of 2007 Pretreatment Mailing

Dear Pretreatment Professionals:

As we draw to the close of another great pretreatment year, I wanted to update you on a couple of items in addition to the invitations to the upcoming year's workshops and your Program Summaries.

1) Design HWA Workgroup: Correspondence sent out to Pretreatment Professionals on 2/19/07 regarding the outcome of the HWA workgroup presented 5 options for calculating conventional pollutant loadings when calculated pass-through loadings exceeded design. PERCS would like to take this opportunity to clarify some of the caveats attached to option #2, **Apply Multiplier of 1.5 to Currently Available Design Criteria.**

   a) **WWTP must have full compliance for parameters requested to be multiplied for the previous 2 years.** The Division and the PERCS Unit realize that there are circumstances beyond the reasonable control of the POTW. Excessive rainfall events or accidents can lead to permit violations. When applying to use the 1.5 Multiplier option, provide an explanation for any permit limit violations for the parameter you are requesting to apply this option to. The PERCS Unit will review the data for patterns of noncompliance that may be a sign of poor plant operation or performance that would indicate that the treatment plant really cannot accept more than the design load.

   b) **This option not available for WWTPs with Design calculations less than 8 years old as it is assumed that the currently available Design is still representative of current WWTP operations.** In terms of design, typically, it takes about 3 years from the design stage of a WWTP until actual operation begins. The permit cycle is 5 years, hence 8 years was selected as the age of a WWTP design before the 1.5 Multiplier option can be used. If a POTW feels their design calculations are inaccurate despite being less than 8 years old, provide justification as to why it is inaccurate. For instance, a plant designed for biological nutrient removal may include chemical feed because the historical influent BOD is too low to support the process. Another example might be that increasing the influent BOD may decrease the need for the chemical addition. Other factors such as if a facility can show that the influent of the treatment plant has changed significantly since the time the design loadings were determined and it can demonstrate that the facility is meeting and exceeding permitted limits that the facility was originally designed to meet may also be taken into consideration.

   Please keep in mind that DWQ and the PERCS Unit are always willing to entertain proposals for WWTPs with special circumstances. Possibilities include WWTPs that were designed for parameter levels that are well below typical domestic levels for the applicable parameter.

The 2/19/07 letter also stated that the options were also to be used for ammonia. PERCS meant this to be of benefit to the POTWs, however many felt that other options should be explored before limiting the ammonia to just the 5 options presented. Therefore, Phase 2 of the Design HWA workgroup to address ammonia and other nutrients will reconvene on January 17, 2008. Until a final set of options are developed, POTWs may use the pass-through calculations for nutrients. You are strongly cautioned not to allocate above the design MAHL for ammonia or other nutrients of concern at your WWTP.

2) IUP Workshop: The first meeting of the Industrial User Permitting Writing guidance workgroup will be in January or early February (the date, time, and location will be posted on our web-site in early January). If you would like to join us, or have suggestions on guidance to be developed, contact Dana Folley or just come to the meeting.

3) Rulemaking: A draft of the NC General Pretreatment Regulations – 15A NCAC 02H .0900 – is with the Regional Office inspectors for comment. We hope to finalize the DWQ internal draft by the end of February 2008. The next step will be a series of meetings with a small group of POTWs to get detailed input. If you would like to participate, or have suggestions on what to change, contact Dana Folley or the Consortium.

4) Streamlining: Most POTWs have received their SUO review letters, and the rest will by the end of January 2008. Don't forget to submit the final adopted SUO to the PERCS Unit, including documentation of adoption and effective date. All POTWs are reminded that you must **incorporate the Required changes in the new Model IUP at your next IUP renewal**. Visit www.ncwaterquality.org, then click on *Wastewater* and then *Pretreatment*. Scroll down to the Streamlining Update area for more directions.

5) Also, please see the following **important** attachments:
   a) Invitation for January 2008 Comp Judge, Significant Non-Compliance (SNC), and Pretreatment Annual Report (PAR) Workshops.
   b) Program Info Sheets and Historical SNC Sheets for your POTW. Please **review, mark any corrections, and include them with your 2007 PAR due 3/1/08** (if you have a consultant working on your PAR, remember to send them copies.)
   c) Invitation for six 2008 Headworks Analysis Workshops.

As always, please contact us with any questions or comments.

Sincerely,

Deborah Gore, Acting PERCS Unit Supervisor

Cc with enclosures:
RO Pretreatment Contacts
PERCS Pretreatment Staff

Michael F. Easley, Governor

William G. Ross Jr., Secretary
North Carolina Department of Environment and Natural Resources

Alan W. Klimek, P.E. Director
Division of Water Quality

December 15, 2006

Subject: End of 2006 Pretreatment Mailing

Dear Pretreatment Professionals:

As we draw to the close of another great pretreatment year I wanted to update you on a couple of items in addition to the invitations to this years workshops and your Program Summaries.

6) To address EPA's "Streamlining" changes to the Federal pretreatment rules in 40 CFR 403, PERCS has published four documents on our web-site:
   i) Streamlining Guidance for NC Carolina Pretreatment Programs;
   ii) Updated Model SUO;
   iii) SUO Discussion and Checklist; and
   iv) Updated Model IUP.

   In part because of these new rules, all NC Pretreatment Programs are reminded that they must **submit an updated SUO and Checklist following this guidance by June 1, 2007**. This submittal may be submitted in draft form, with adoption after PERCS approval. All NC Pretreatment Programs must **incorporate the Required changes in the new Model IUP at your next IUP renewal**. Visit www.ncwaterquality.org, then click on *Wastewater* and then *Pretreatment*. Scroll down to the Streamlining Update area for more directions.

7) Also, please see the following **important** attachments:
   a) Invitation for January 2007 Comp Judge, Significant Non-Compliance (SNC), and Pretreatment Annual Report (PAR) Workshops.
   b) Pretreatment Delegation Guidance. **All NC POTWs must submit a PAR Delegation Statement with their PAR due 3/1/07.**
   c) Program Info Sheets and Historical SNC Sheets for your POTW. Please **review, mark any corrections, and include them with your 2006 PAR due 3/1/07.**
   d) Invitation for January, April, and August 2007 Headworks Analysis Workshops.

Unfortunately, staff vacancies and work on Streamlining delayed our update of Industrial User Permitting Writing guidance and Workshop. Work on this will begin in the New Year, with our first workshop in Spring 2007.

As always, please contact us with any questions or comments.

Sincerely,

Jeff Poupart, PERCS Unit Supervisor

Cc with enclosures:
RO Pretreatment Contacts
PERCS Pretreatment Staff