



North Carolina Pretreatment Consortium, Inc.

**Membership Meeting
May 27, 2010**

A. The North Carolina Pretreatment Consortium Meeting was called to order at approximately 10:30 am, on May 27, 2010, by Donald Smith, Chairman, at Lake McIntosh, Burlington, North Carolina.

B. **In Attendance were:**

Sara Allen	Tim Downs	Andy Hicks	Michael Rhoney
Sherry Bagwell	Bobby Edwards	Kathy Hill	Robert Sherman
Tyrone Battle	Ryan Faw	John Kiviniemi	Donald Smith
Nadine Blackwell	Dana Folley	Jamie Levis	Shannon Sypolt
Brenda Bordeaux	Regina Fortune	Mark Lovitt	Chad Thompson
Angela Boswell	David Gardner	Jason Manning	Cheryl Tilley
Eric Brackett	JoEllen Gay	Sharon Miller	Grant Trivette
Dolores Bradshaw	Bill Gintert	Sarah Morrison	Jon van Hoff
Stephanie Brixey	Deborah Gore	Dawn Padgett	Amy Varinoski
Burrell Brock	Martie Groome	Vicky Payseur	Joan Wall
Jeff Camp	Stephen Haller	Joe Pearce	Bernadine Wardlaw
Fred Dancy	Chad Ham	Scott Pickard	Forrest Westall
Michele Dawes	David Harden	Ralph Potter	
Jennifer Doll	Monti Hassan	Jeff Poupart	

C. Minutes from the previous meeting were approved.

D. **Updates**

1. Certification- Sharon Miller confirmed that twenty-four students attended the Grade 1 school in 2010. Certification school next year will be held April 25 – 28, 2011, in Clemmons.
2. Conference Planning Committee- Donald Smith gave the update that the committee continues to move forward with the planning. The Conference dates are October 3 – 5, 2010, at the Sheraton in Atlantic Beach.

3. Additional Updates- Vicky Payseur confirmed that taxes were filed on time. JoEllen Gay gave an update on Newbie Meeting that was held in Wilson. Seven people participated and two new members joined NCPC. This meeting was scheduled to have an informal meeting with pretreatment folks that have five years or less of experience.

E. **Announcements**

Donald Smith welcomed Mr. Forrest Westall, EMC Member, DWQ Staff, and non-members in attendance.

F. **Julie Grzyb, NC-DWQ, NPDES Complex Permitting Unit
Surface Water Triennial Review: Impact on NPDES Permits**

Ms. Grzyb presented a power point presentation on Surface Water Triennial Review: Impact on NPDES Permits. NC added acute standards and DWQ will use EPA translators to determine dissolved metals. When writing permits DWQ will look at combined hardness equation which consist of plant effluent and the eight digit HUC. Dissolved metals in the stream are more of a concern to DWQ because they are bioavailable. Dissolved metals can vary based on pH, temperature, hardness, dissolved organic materials and TSS because they are binding sites for metals. NC has always used EPA acute standards but DWQ will be using a 1Q10 flow instead of a 0Q10 flow which increases the acute standard.

The website for the translator is:

<http://portal.ncdenr.org/web/wq/swp/ps/npdes/calc/userguide>

The guidelines are on the website along with the calculator. There are two calculators. Calculator One is conservative and Calculator Two allows you to adjust the hardness. The calculator carries it one digit further than it would be in your permit. If the calculated limit is 2.94 the permit limit will be 2.9. DWQ is hoping that EPA will allow them to keep 25 mg/l as the lower limit for hardness instead of going lower. For hardness testing DWQ is more interested in seeing variation over time than number of samples. They recommend one sample each month for a year. DWQ was dividing basins into sub-basins, now they are using the HUC which is slightly larger than the sub-basins.

If the In Stream Waste Concentration is higher then your limit will be lower. Calculator One is based on a 25 mg/l hardness and a TSS of 10. The higher the TSS, the higher the limit goes. There are seven states in Region Four. Five of the seven have dissolved metal standards. Other states in Region Four are using the same calculator. The EPA translator is the easiest to use. The draft translators are generous. EPA does not recommend using these calculations; however everyone uses them because this is all they have.

- Some states are just using HUC data.

- Some states are looking at long term averages of TSS.
- Some states will consider data if the POTW's have any.
- Some states default to a TSS of 10.
- Some states have modeling data that they use.

Permit limits are calculated by:

Total Metals

In Stream Wastewater Concentration (based on 7Q10 and NPDES Flow)

Acute limits are calculated by:

Total Metals

In Stream Wastewater Concentration (based on 1Q10 and NPDES Flow)

Permit limits will not be site specific but HUC specific using the 10th percentile so streams are ninety percent protected. The permits would only require sampling for action level limits if you fail whole effluent toxicity but monitoring could be required. Try to find a lab with detection levels below your permit limits. DWQ would like to have at least one sample per month for at least a year for hardness values. When you submit your permit renewal application, submit your hardness data. DWQ would like for everyone to submit E-DMR's. Contact Karen Rust if interested.

Questions:

Dawn Padgett: Most of Charlotte's HUC data is in South Carolina. Can Charlotte use SC data in the equation?

Julie: We would like to see the actual data from SC. They should allow access to that data. DWQ will probably not allow data from other states but will look at it.

Joe Pearce: Why was the eight digit HUC decided on versus the eleven or fourteen digit HUC?

Julie: The state is focusing on the eight digit HUC for all permit and standards development. The eight digit HUC has more to do with encompassing the whole watershed. If you do not want to use the HUC then you will need to do a site specific study and you will need both state and EPA approval.

Dawn Padgett: Can we collect enough river and stream data and what would we need to do to make the data acceptable to be used by planning when they are looking at the impaired list to see what the real state of the rivers and streams are in? We are not real happy with having all of our receiving streams impaired for copper and zinc.

Julie: Jay Sauber would have that data and would make that decision.

Dawn Padgett: We would like for our data to be included with the states for a better database.

Vicky Payseur: Is the color change test okay?

Julie: No. The sampling must be done by a certified lab whether it is your own lab or a contract lab.

Donald Smith: Have we got any ambient hardness data since 2001?

Connie Brower: The state has resumed hardness testing with metals testing.

This presentation is available on the NC-PC website.

**G. Deborah Gore, NC-DWQ, PERCS Unit Supervisor
Proposed Metals Water Quality Standards (WQS): Impact on Pretreatment**

The presentation was straight forward but these are comments, questions and answers that were asked during the meeting.

Once you have figured out what your 5% MAHL will be, you will need to go back to the Industrial Waste Surveys and look at what industries could now become SIU's. You can research MSDS sheets or the type of industry to determine if they could become an SIU or sample at the different industries. Remember to add the time and cost of these activities to your fiscal note. Don't forget to add any lab equipment and additional cost for running lower PQL's to the fiscal note.

Joe Pearce: Is there any reason we are not doing mass based limits?

Deborah: You can do that in your SIU permits.

FUTURE GROWTH – As your flow increases so will your MAHL. They are based on your current averages. Uncontrollable can still be tied on and could help with the MAHL because it increases the flow but not the concentration.

Martie Groome: One of my concerns is that at 50% hydraulic capacity, even after all of these gyrations, I have 11% reserve for this pollutant which is in certain uncontrollables. I understand and am very appreciative of getting to the point where I can say I'm no longer over allocated but that's assuming that I never go over 50% or that my 2009 data is representative. My 2009 data is in no way indicative. We've got platers that are on furlough for two weeks out of the month. These are things that we hope will come back. Trying to help them come back by saying you have to spend \$500,000 on a new pretreatment system is not the way to help them.

JoEllen Gay: On the headwork's can we use the permitted flow?

Deborah: No, it would not be protected.

PERCS is looking at alternatives in the HWA like lowering uncontrollable. It is unscientific to use zero PQL but it is just as unscientific to say half PQL.

Dawn Padgett: Be careful with lower limits. We collected composite samples with DI water running through the tubing and after seven days the tubing had a cadmium result of 4.5 mg/l for lead. Our industry detection level for Cadmium can be higher than 8mg/l. Industry cannot always have super low detection levels because of other wastewater constituents causing interference. If they are below detection level on cadmium would they be required to have a permit limit because of the higher PQL?

Deborah: It depends on your effluent. If your effluent is in compliance then we would probably not have to give them a permit limit, but if your effluent is not in compliance, then everything would be looked at.

Approximately twenty-five percent of WWTP's will likely receive an NPDES permit limit for lead with an occasional violation.

Martie Groome: So, to our fiscal note, can we add the civil penalty potential?

Deborah: I don't know. I thought about mentioning that and figured that someone would ask. Hopefully the new PQL will confirm that there are lower concentrations. A PQL of one is now available.

Joe Pearce: Permits require composite sampling in the case of cadmium, are they foreseeing going to grab? Can we get a letter from DWQ to allow grabs?

Deborah: That would not be PERCS.

Joe Pearce: We can't do clean sampling with a composite.

Jeff Poupart: Clean sampling is changing tubing every day.

Deborah: Composite sampling is a 40 CFR rule.

Martie Groome: We do it with Mercury every day?

Dawn Padgett: Composite sampling itself is not clean. There are multiple places to get contamination for example the operator cuts the tubing with their pocket knife. After running a blank there is trace amounts of lead in the tubing. There are a lot of issues with lead on a composite sample.

Martie Groome: 1669 sampling technique is not limited to Mercury; you can use it with any metal.

Donald Smith recommended that this information be shared with the industries in your area to see what type of fiscal impact these changes will have on them.

This presentation is available on the NC-PC website.

- H. Donald Smith thanked DWQ for attending the meeting. The meeting was adjourned at approximately 1:15 pm

The next NCPC membership meeting will be Thursday, July 15, 2010, at 10:30 at the Mebane Arts & Community Center, Mebane, NC.

Respectfully submitted,

Stephanie Bracey

2010 Secretary NC-PC