

CWA Consulting Services, LLC

Curt McCormick is the Owner of CWA Consulting Services (CWACS). Curt was EPA Region 8 Pretreatment Coordinator from 1990-2007 earning several Bronze medals and other awards for work. He directly implemented the EPA pretreatment program in Colorado and Wyoming and oversaw the other Region 8 states. Curt coordinated 17 annual Region 8 Industrial Pretreatment Workshops and authored many guidance and strategy documents, including the Region 8 Strategy for Technically-Based Local Limits. Curt began his pretreatment career at a local POTW in the mid-1980's.

Curt's career at EPA began in 1987 at EPA Region 6 where he developed the Whole Effluent Toxicity (WET) program, was a pretreatment staff member and wrote major municipal permits. In 1989, Curt transferred to EPA Region 8 and was Team Leader for the Safe Drinking Water Act Implementation and Enforcement Program.



CWA Consulting Services, LLC.

Providing Services to POTWs:

- ◆ Local Limits and Permit Specific Limits
- ◆ POTW Legal Authority
- ◆ Training
- ◆ Pretreatment Program Implementation
- ◆ Enforcement Support
- ◆ Program Development

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Mercury Control Programs for POTWs



CWA Consulting Services, LLC

Consulting Services for Clean Water Act Pretreatment Programs

Mercury Control Programs

The Pretreatment Streamlining regulations that were promulgated by EPA in 1999 require the POTW to take specific and formal steps to adopt, implement and enforce BMPs. With EPA's finalization of the Methylmercury Permit Implementation Guidance, POTWs that have measurable mercury in their discharge will be expected to implement a mercury control program. CWACS now offers support for the design and implementation of Mercury Control Programs.

CWACS Assistance

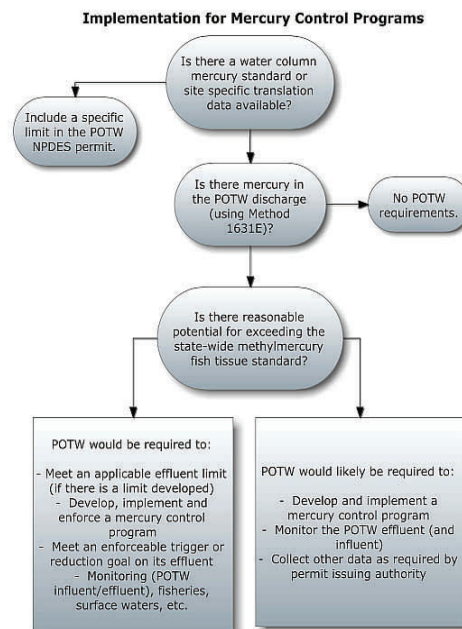
CWACS offers the following Mercury Control Program Support:

- ✓ Review of draft NPDES permit language.
- ✓ Assess the current POTW influent and effluent data.
- ✓ Evaluate dischargers that may be mercury sources to the POTW.
- ✓ Evaluate level of reduction necessary to meet permit limits and water quality standards (required by 40 CFR Part 403).
- ✓ Evaluate the POTW legal authority for best BMP authority.
- ✓ Develop policy/BMP requirements for dental and other dischargers.
- ✓ Hold technical meeting with dentists to assure technology transfer.
- ✓ Work with dentists and amalgam separator companies to assure best price.
- ✓ Work with the POTW to track success of BMP implementation.

Methylmercury in fish is a direct threat to human health. Sources of mercury to surface waters include air deposition, direct discharges regulated by the NPDES program and non-point sources.

EPA, with the adoption of the new Methylmercury water quality criterion, has sent a clear message: The Clean Water Act will be harnessed to regulate discharges of wastewater from point sources that contain mercury to the greatest extent possible.

While the EPA and state implementation is ill-defined, the overall process or conceptual implementation model is as follows:



Where a POTW detects mercury using a sufficiently sensitive test method (e.g. 1631E), a state NPDES permit writer would include a requirement for the POTW to implement a mercury control program. EPA believes that mercury reductions achieved through implementing mercury control programs could result in important reductions in mercury loadings.

EPA is adopting the approach that where a POTW implements BMPs and achieves defined reductions of mercury in its effluent, these would constitute a water quality-based effluent limit and compliance with the limit.

CWACS will assist the POTW in its efforts to control mercury. CWACS strongly recommends that POTW implement these controls before EPA or state mandate these activities by including enforceable requirements in NPDES permits.