

## CWA Consulting Services, LLC

Curt McCormick is the Owner of CWA Consulting Services (CWACS). CWACS provides pretreatment program support to local governments across the U.S.

Curt was EPA Region 8 Pretreatment Coordinator from 1990-2007 earning several Bronze medals and other awards for his work in pretreatment and enforcement. He directly implemented the pretreatment program for EPA in several states 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 Imple-



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### 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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## Local Limits Software for POTWs

### Software for CWACS Clients Only

GENERAL DATA ENTRY		POTW NAME:	CWACS
Date			
POTW Flow for Local Limits (mgd)			10.00
SIU Flow for Local Limits (mgd)			1.000
Flow for Permitted NON-SISs (mgd)			0.000
Domestic Flow (mgd)			7.000
Commercial Flow (mgd)			2.000
Trucked and Handed Wastewater Flow (mgd)			0.000
IRI / Stormwater / Other			0.000
Total (mgd)			10.000
Total flows as a percentage of POTW Flow (%)			100
Flow that is unaccounted for (mgd)			0
% of Flow not accounted for			0.0
Domestic as a % of Total Flow			70
Commercial Flow as a % of all non-domestic			67
Total Commercial Flow as a % of Total POTW Flow			20
Total non-domestic flow as a % of total POTW flow			30
Specific Gravity of Sludge to Disposal (kg/L)			1.00
Sludge Flow to Disposal (mgd)			0.0020
% Solids to Disposal (%)			13.00
Biosolids Table (L3 OR "OTHER") Based on Disposal Option:			3
Are You Using Table 2 for Biosolids (Y/N)?			N
Site Area (Acres)			
Site Life (Years)			
Acute Receiving Water Flow (mgd)			5.00
Chronic Receiving Water Flow (mgd)			10.0
Use EPA Default Water Quality Criteria where there is no State Standards (Y/N)?			n
Hardness for Metals Calculations (mg/L)			200
Chronic Metals Hardness (mg/L) - Optional			
Is Your Receiving Water a Drinking Water Supply (Y/N)?			y
Applicable Standards (ACUTE, CHRONIC, BOTH). Enter A, C, or B:			b

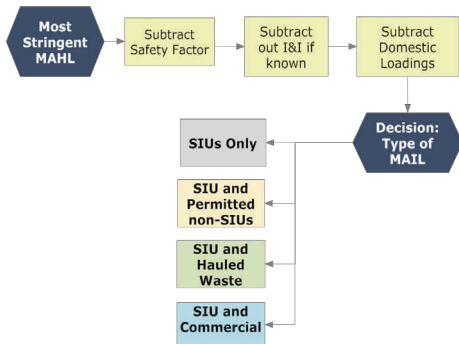
## CWA Consulting Services, LLC

### Consulting Services for Clean Water Act Pretreatment Programs

## Local Limits Excel Spreadsheet

POTWs need an organized and flexible method for calculating local limits for clients that contract with CWACS to do local limits. The CWACS local limits spreadsheet provides the following benefits:

- ✓ Provides a Excel-based spreadsheet for performing calculations.
- ✓ Compatible with Microsoft Excel 2003 and 2007.
- ✓ Allows for POTW site-specific approaches.
- ✓ Provides a great method to maintain original data and assumption to be maintained.
- ✓ Allows calculation of local limits for SIUs only or SIUs and Permitted Non-SIUs.
- ✓ Provides consistency with EPA and state requirements for calculations.
- ✓ Updates and support from CWACS.



**Cost:** \$310

## Local Limits

If you are planning an update to your local limits, CWACS can provide support ranging from assisting in the design of the project to review of your local limits submittal package to providing complete local limits revisions. In addition, CWACS has developed software that makes calculating and documenting local limits calculations simple. Don't keep out-of-date local limits that are not technically-based nor legally defensible.

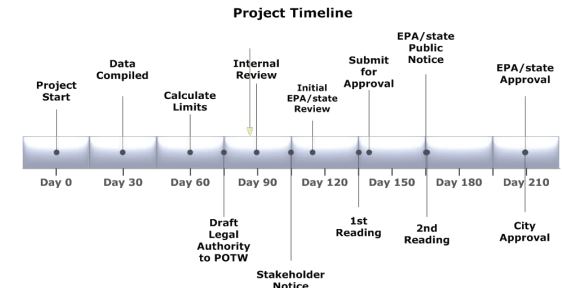
The CWACS Local Limits Spreadsheet provides templates for organizing SIU data, influent, effluent and sludge data, commercial and domestic data that will be used in the spreadsheet. Data requirements for the User are highlighted.

### When are local limits most typically required to be re-evaluated?

1. When re-applying for a NPDES permit.
2. When a Water Quality Standard changes or another applicable standard (e.g. sludge disposal) changes.
3. When POTW construction project is completed that changes design flows or loadings.
4. When the approved MAIL is exceeded or the MAHL is no longer valid.
5. When ordered to by the Approval Authority as a result of an audit or annual report finding.

### How long do you have to modify the limits?

Most approval authorities will allow nine months to develop and submit a local limits change.



### What records have to be maintained?

The POTW must maintain the data and information used in local limit calculations for at least three years after that local limit is no longer in effect.

### Should I wait until the Approval Authority requires me to update my limits or do it as I identify the need?

Tough questions. Failure to update local limits as Standards change could result in serious problems with enforcement. Failure to act when the MAIL is being over-allocated would be a violation. Failure to address changes in flow assumptions, new standards or increased loading resulting in an applicable MAHL being exceeded may not protect the POTW and receiving water from Pass-Through or Interference. POTWs are always recommended to be diligent on keeping their programs up-to-date.