



# Inside Pretreatment Newsletter

March 17, 2009

Spring is upon us (well, most of the country). I know everyone is busy. I have shorted the newsletter with more links for the items you may be interested in obtaining more information. Enjoy and I will talk to you next month!

## Training for Local Governments

**Local Limits Training:** March 31-April 2, 2009. [Indianapolis, IN.](#)

**Local Limits Training:** April 28-30, 2009. [Arlington, Texas.](#)

**Local Limits Training:** June 9-11, 2009. [Portland, Oregon.](#)

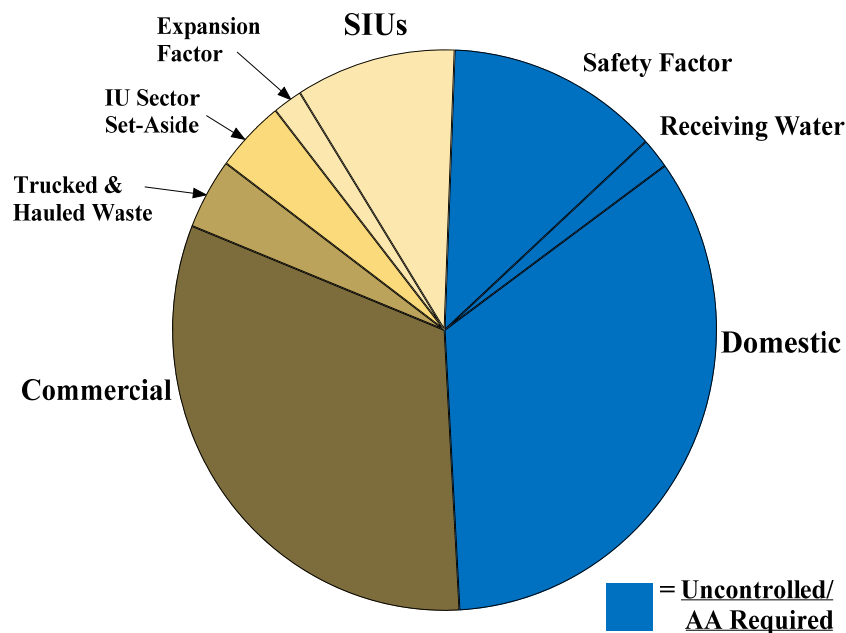
**Local Limits Training:** July 14-16, 2009. [Orlando, Florida.](#)

Other training:

**IU Inspectors Training:** May 11, 2009. [Cody, Wyoming.](#)

These courses are for POTW Pretreatment staff and managers that work for local programs.

Be sure to go to: [www.CWACS.com](http://www.CWACS.com) and click on the Training Courses tab. Workshop attendance is limited. This website is updated as registrations are received. On the website, you will find all meeting locations, registration information, registration deadlines, and whether or not spaces are available.



## **Local Limits Spreadsheet – Trial Version Available**

If you need a tool for completing a local limits evaluation, we are getting ready to release our spreadsheet for sale to government agencies (tax exempt). The spreadsheet provides an organized and straight-forward method of completing a local limits evaluation. You can download and check out a trial version and learn more at [www.CWACS.com](http://www.CWACS.com) and click on the tab that says Local Limits Software.

## **Methylmercury**

Last month's newsletter and previous ones (see Newsletters section on the CWACS website) have included discussion on Methylmercury. I recommended that POTWs notify EPA that they want the opportunity to review and comment on the draft NPDES implementation guidance that will affect the majority of POTWs in the U.S. If you detect mercury in the POTW effluent, you will likely be required to take further (ill-defined) actions. If nothing else, give yourself the opportunity to provide POTW input into this document. The POTW community is the largest sector that will be impacted. There was little notice of this document when it was public noticed years ago. And, more recently, the document has been significantly changed. You can download the latest version that is undergoing EPA review.

[www.epa.gov/waterscience/criteria/methylmercury/guidance-final.html](http://www.epa.gov/waterscience/criteria/methylmercury/guidance-final.html)

Document Name: Methylmercury Fish Tissue Criterion: Guidance for Implementing the Methylmercury Water Quality Criterion. January 2009. EPA 823-R-09-002.

EPA Contacts that you may want to email to request that EPA re-public notice this document in the Federal Register to allow POTWs to provide review and comment:

Jim Hanlon                    [hanlon.jim@epa.gov](mailto:hanlon.jim@epa.gov)  
Linda Boornazian         [boornazian.linda@epa.gov](mailto:boornazian.linda@epa.gov)  
Ephraim King              [king.ephraim@epa.gov](mailto:king.ephraim@epa.gov)

If you want to learn more about this document and the possible impacts to your POTW, contact your EPA Pretreatment Coordinator

at: [cfpub.epa.gov/npdes/contacts.cfm?program\\_id=3&type=REGION](http://cfpub.epa.gov/npdes/contacts.cfm?program_id=3&type=REGION)

## **NACWA Meeting Later this Month**

I will miss seeing everyone one this year. There are a couple of topics that I will get more information on after the meeting and send out a summary or provide a link to where you can read more. I was interested about the computer-based certification program for pretreatment professionals being implemented by the California Water Environment Association (CWEA). I reviewed some of the information related to this program. The other panel I would have liked to hear deals with antimicrobial pesticides and discharges to POTWs. Triclosan is of interest because

EPA is currently reviewing this widely-used antimicrobial for water quality criteria. Nanosilver is interesting from the aspect of EPA registration for this pesticide and the many applications that are anticipated (washing machines, clothing).

I would particularly like to hear the amalgam separator panel. The panel will include Al Dube (industry expert), Jerry Bowman (ADA Attorney), and Jay Pimpare (EPA Region 1 Pretreatment Coordinator). The moderator is the NACWA mercury contact, but I am not sure if she is giving a NACWA statement to open this session. If they stay on time, you will hear from all the presenters. I hope the audience gets Q&A time for this topic. I am a little surprised that NACWA did not include anyone that has testified in opposition to the ADA (Mercury Policy Project, etc). I guess you control information when you control who speaks.

The EPA/ADA/NACWA MOA ([www.epa.gov/guide/dental/files/mou.pdf](http://www.epa.gov/guide/dental/files/mou.pdf)) is part of this panel discussion. The MOA gives the impression that EPA preferentially supports voluntary programs (the ADA focus) over mandatory programs. At first I was wondering what the heck was EPA was doing (but they did get this out before a change in Administration). At first glance, EPA appears willing to use its influence as the top regulatory agency to push voluntary programs and underplay the effectiveness of mandatory requirements to reduce mercury loading to POTWs through controlling it at the source. I still remember when the EPA signatory on this MOA refused my request to state, in writing, that "EPA believes that amalgam separators are effective at reducing the mercury discharged to a POTW". It still amazes me that such a simple statement would be absent from Agency communications rather than included as a statement of scientific logic. *As a note: CWACS believes that amalgam separators are effective at reducing the mercury discharged to a POTW.*

I expect that EPA will make it clear in all meetings, publications, or other written information of the limitations that the Agency included in Section D of the MOA (thanks to the EPA attorneys and OGC):

1. Mandatory programs shall continue and be maintained and the MOA shall not influence POTW or state activities regarding the implementation of pretreatment requirements.
2. Dentists discharging mercury must comply with POTW requirements.
3. The MOA only applies to EPA/NACWA (the organization) and the ADA, not to POTWs.

If you want more information, read the MOA. If anyone goes to the NACWA meeting, I would love to hear what is said..... can these be recorded? ☺

### **Consortium for Research and Education on Emerging Contaminants**

I was introduced to this area of research and environmental concern several years ago while at EPA. I became part of this group of government and university researchers, private industry, local governments and regulatory agencies that became known as the Consortium for Research and Education on Emerging Contaminants or CREEC (<http://co.water.usgs.gov/CREEC/>). The group is made up of some of the top researchers in the world on these newly emerging chemicals. It is one of the few groups that I have worked with that strives to fully involve everyone and listen to all

perspectives. They have been particularly interested and active in research involving POTWs and the industrial pretreatment regulatory impacts.

### **EPA Region 8 Release an Initial Draft for Hospitals as SIUs**

EPA Region 8 (March 13, 2009) released an initial draft of guidance on characterizing hospitals and medical facilities as SIUs. While there is no date for comments, the draft is to be discussed at the CIPCA/Region 8 Workshop in May. I am not sure where it will be on the agenda as a discussion item (look for the final workshop agenda). The document is a great start at identifying and/or addressing the relevant questions: What are the regulated (process) wastestreams? What is the data needed to determine whether or not these IUs are SIUs? What information should the IU be asked for and what follow-up is required by the POTW? If the IU is violating 403.12(p), how does this affect the IU classification?

The contact for this document (undated and no contact info included) is Al Garcia, EPA Region 8 Pretreatment Coordinator ([garcia.al@epa.gov](mailto:garcia.al@epa.gov)). I think that this document would be useful for all POTWs to review (and especially later drafts). This is a very good start and with more emphasis on discharges of pharmaceuticals, there is a chance that this guidance will fill a gap that has been missing at EPA. Download at: [www.CWACS.com](http://www.CWACS.com) and look on the homepage.

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