



Inside Pretreatment Newsletter

June 20, 2008

First Day of Summer!

At 8600' ASL we do celebrate the first day of summer.

Training Course

Designing and Implementing a **Grease Control Program** (1 day)
Local Limits Development (3 days)
August 11-15, 2008.
Lakewood, Colorado

You can learn more at: www.CWACS.com Information on cost, lodging, etc. will be provided to registrants. This course is limited to 50 people and is only open to municipal or district employees. We now accept credit cards! Early registration end July 23, 2008.

Hospital Workshops

For Colorado and So. Wyoming POTWs: Please be sure to register for the Hospital Workshop. After **July 1**, we will be opening this up to allow more than one attendee per POTW. The July 23rd workshop is for Medical Facility personnel. The July 24th workshop is for Pretreatment Staff. Please let your hospitals know about this FREE workshop. Go to www.CWACS.com for more information. Pre-registration is required and lunch is provided.

CREEC

The Consortium for Research and Education on Emerging Contaminants (CREEC) is a non-profit organization. This organization is made up of Federal, state and local governments, in addition to, researchers from universities and a number of private industries. You should check out their website and join. Even if you cannot attend the meetings, it is really good to get on their email list to hear about new research and upcoming meetings. Go to: <http://co.water.usgs.gov/CREEC/>

Methylmercury

No word on this water quality criterion document yet, but when it comes out I will let you know (see topic in last newsletter).

Interesting Michigan Mercury Bill

The State of Michigan is proposing to adopt a bill that would require dentists to install amalgam separators by 2013. Pretty long implementation for that requirement. The real interesting part is that it has the Michigan Board of Dentistry writing the associated BMPs. It specifically prohibits local governments from establishing anything more stringent than amalgam separators or more stringent requirements than those established by the Dental Board.

Example: I am the MI Board of Dentistry. I adopt the following (and it becomes State law overriding local and State pretreatment programs):

- ✓ Inspections for amalgam use shall be conducted no more frequently than once per 3 years.
- ✓ Inspections shall consist of a face-to-face meeting with the dentist-in-Charge.
- ✓ Dentists shall self inspect and certify annually that they are using amalgam separators and everything is peachy.
- ✓ The municipal government shall not do an on-site inspection of any dentist that self inspects and certifies.
- ✓ The municipal government shall not sample any effluent from any dentist that provides the self inspection and certification.
- ✓ Dentists shall determine O&M frequency for their amalgam separators.
- ✓ Dentists shall be exempt from local and State enforcement as long as they are in compliance with the above.

Is it a good idea for the regulated community to write their own rules? Probably not. Is this a good precedent? Well, for the pretreatment program, probably not.

I believe that this law would be a modification to the authorized NPDES program requiring EPA approval. I know the **EPA is aware of this Bill**, but it is unknown if they have made comments or even provided a position on this issue. Just wanted to let you see the effect of a lobbying organization getting direct access to the State legislature. There is always more to this story. What made the Dental Board so upset? Someone should look into that. Here is a link to the bill:

<http://www.legislature.mi.gov/documents/2007-2008/billintroduced/Senate/pdf/2008-SIB-1310.pdf>

Thanks for the head's up on this one.

Newsletters reflect the opinions of CWACS. They are not intended to change what a specific Approval Authority may require.

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