

# Oregon DEQ Industrial Pretreatment Program Update

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Genet Belete

[belete.esegenet@deq.state.or.us](mailto:belete.esegenet@deq.state.or.us)

503-229-5586

## Program Update

1. Industrial User Survey for non-approved Programs
2. Updating the Local Limits calculating worksheet based on the state's current WQ criteria
3. Conversations on development of IPP for POTWs accepting high strength waste from breweries, wineries and seafood processors
4. Oregon DEQ's e-reporting implementation plan

# **1. Industrial User Survey requirement for non-approved Programs**

- There are 324 wastewater treatment facilities in Oregon
- 24 approved pretreatment programs
- No prior IU Survey requirement for non-approved programs
- DEQ recently started to issue permits with IU Survey requirements
- The DEQ pretreatment program is now receiving IU survey reports

# **Industrial User Survey requirement for non-approved Programs**

## **Challenges-**

- Increased administrative workload in managing IU survey reports
- Increased technical assistance on questions related to conducting the survey
- potential increased workload as SIUs are discovered in smaller communities with no prior approved IPP

## **2. Local Limits Worksheet Update**

- DEQ revised the Local Limits worksheet to include the recent update in the state WQ standard
- In June 2016, Oregon ACWA sponsored a two-day LLs workshop
- pretreatment programs are using the worksheet and updating their LLs

### **3. High strength waste from breweries wineries and seafood processors**

- Small wastewater treatment systems are increasingly challenged with WW discharge from breweries and wineries
- Coastal seafood processing communities and businesses looking into possible alternatives of discharging to city sewers in lieu of direct discharge to state waters
- The DEQ IPP role in assisting communities in developing voluntary pretreatment program
- Oregon ACWA providing assistance to small communities

### **3. eRule Overview**

- EPA's Electronic Reporting Rule (eRule) was effective December 21, 2015 and promulgated as 40 CFR 127.
- Implementation is in two phases. The dates for permit holders to report data electronically with EPA is:
  - Phase 1 by December 21, 2016 and
  - Phase 2 by December 21, 2020
- EPA provides CROMERR-compliant NetDMR and NeT for electronic reporting.

# eRule Overview

DEQ's plan on Phase 1 reporting-

- DMR data to EPA using EPA's NetDMR tool
- Non-DMR compliance reports to EPA using e-reporting tool NeT, another EPA developed data system



# eRule Overview

## DEQ on Phase 1 reporting-

- DMR reporting is based on the types of permits, and due date is after December 21, 2016.
- Majors, Jan-March 2016
- Minors April –June 2016
- General Permits, August- October 2016

# eRule Overview

DEQ on Phase 1 reporting-

Before reporting DEQ will work with permittees to:

- Identify- POTW facility representative
- Training- in DMR entry/submission process
- Testing- Practice using NeTDMR
- Registration- to use NeTDMR and NeT to begin electronic submittal
- Get DEQ approval for full access to NeTDMR and NeT

# eRule Overview

## DEQ's tentative plan on Phase 2 reporting-**NeT Reporting Tool** for Biosolids, Pretreatment and MS4

In collaboration with EPA, DEQ to facilitate:

- NeT tool development and beta testing for Phase 2 by workgroups (program coordinators)
- DEQ will explore combined federal reporting and attached state reporting;
- NeT training and testing for signatory officers (delegated signature authority)/admin officials;
- EPA has help desk for NetDMR and NeT.
- DEQ explores e-reporting options for phase 2

DEQ contacts for e-reporting:

William (Bill) Hickey, DEQ Project Manager (eRule Phase 1 implementation is one of his three WQ projects), (503) 229-5615 or [Hickey.William@DEQ.state.or.us](mailto:Hickey.William@DEQ.state.or.us).

James (Jim) Billings, DEQ Water Quality Compliance Coordinator, 503-229-5073 or [Billings.Jim@DEQ.state.or.us](mailto:Billings.Jim@DEQ.state.or.us)