



Industrial Pretreatment Newsletter

An Update on Mercury Regulations

Over the past few years, mercury regulations have increased across the state and nation. Back in July 2014, we informed you about Mercury Minimization Plan requirements that are now in place at our wastewater treatment plants. We also gave you some tips on how to be proactive at your place of business. In July 2015, we gave you an update on a proposed EPA rule that would require dental offices to install amalgam separators to trap mercury-containing amalgam for proper disposal. In 2016, we took on an extensive survey effort to fulfill requirements of our Mercury Minimization Plans and to inform local dentists of future regulations.

In this 2016 effort, the Industrial Pretreatment Program staff performed 386 dental questionnaires to better understand local dental practices and estimate current usage of amalgam separators. Of the 386 surveys, 195 dental offices were found to be covered under the rule. Of those 195, about one third already have amalgam separators installed and are generally compliant with future regulations. This means roughly two thirds of dental offices still have some work to do to gain compliance should the ruling take effect. A decision may come down as early as the end of this year, so stay tuned!

More information about the proposed EPA rule can be found at the links below.

Website: <http://water.epa.gov/scitech/wastetech/guide/dental/>

Fact Sheet: <http://water.epa.gov/scitech/wastetech/guide/dental/upload/-Effluent-Limitation-Guidelines-and-Standards-for-the-Dental-Category-Factsheet.pdf>

Slug Spill Control Plan, Toxic Organic Management Plan, and Signatory Authority Review

In the coming months, the City of Raleigh Pretreatment Program will be reviewing Slug Control Plans, Toxic Organic Management Plans, and Signatory Authority documentation for all permittees. Each of these documents are important elements of industrial permits and are generally required for most industries. Please look for future emails and correspondence detailing this process. Take a moment to review your documents and please do not hesitate to call or email if you have any questions about your current plans and signatory authority.



WELCOME to the *Industrial Pretreatment Newsletter*—a biannual newsletter designed to educate and inform interested parties on current happenings in the City of Raleigh Industrial Pretreatment Program.

Monthly Reporting

Your friendly reminder about monthly reporting requirements:

- Reports due on the 20th of the month
- Cover page (Monthly Facility Status Sheet)
- Summary page (Industrial Data Summary Form)
- Lab reports and chains of custody

Noncompliance Reporting

- 24-hour notification requirement for any noncompliance
- Resample within one week of becoming aware of a violation
- Investigate cause of noncompliance

Wastewater Environmental Management System

What is a WEMS?

The Resource Recovery Division's WEMS (Wastewater Environmental Management System) utilizes an environmental policy and a system of checks and balances to provide a sustainable wastewater program for customers while protecting the environment and maintaining public health at a fair and reasonable cost.

The WEMS team establishes annual goals in order to measure success and create opportunities for improvement. Some of the highlights of this year's WEMS program include:

2016 Regulatory Compliance:

NRRRF received Platinum award from the National Association of Clean Water Agencies (NACWA) for 13 consecutive years without a permit violation.

Recertification was continued in late January 2016 for ISO 14001:2004 in addition to recertification for National Biosolids Partnership (NBP) EMS. Additionally, Smith Creek and Little Creek Wastewater Treatment Plants have been rolled into the EMS program.



2016 Targets & Objectives

- Improve and monitor reuse water quality (on target).
- Reduce total nitrogen discharge in the effluent at NRRRF (on target).
- Initiate ISO 17025 laboratory certification (on target).
- Continue to produce exceptional quality Class A biosolids (complete; monitoring occurring on a monthly basis)
- Optimize new biological phosphorous removal at NRRRF (not on target due to contractor delay in Phase 3 construction upgrades).
- Manage key elements of Industrial Pretreatment program with pretreatment software (this item is now being handled by our TAG Team)
- Distribute Little Creek's biosolids under NRRRF outlets (on target)
- Improve efficiency of biosolids handling by reducing volume and hauling requirements (this item will be continued into 2017).
- Improve laboratory staff development and competency by cross training (complete)
- Increase level of preventive maintenance (on target)
- Improve remote facilities hazardous weather readiness & response planning (on target)
- Develop Equipment Operating Procedures (EOIs) for plant equipment at Little Creek and Smith Creek WWTPs (on target)
- Increase the amount of basin profile sampling for Smith Creek WWTP (on target)
- Maintain 100% regulatory compliance (on target)

The Targets & Objectives program continues to be a key process in the continual improvement of the Wastewater Environmental Management System.



For more information about our Wastewater Environmental Management System, please feel free to contact us:
Emily Fentress, 919-996-3700, emily.fentress@raleighnc.gov

Upcoming Events

City of Raleigh Industry Day

The City of Raleigh's annual Industry Day event will be held in the Fall at the Neuse River Resource Recovery Facility. Industry Day is a great way to receive general Public Utilities updates, network with industry colleagues, tour the treatment plant, and get a free lunch! Please look for more information to follow. We look forward to seeing you there.

EPA Metal Finishing Guidelines Review and Zirconization Memorandum

As we have several metal finishing industries in the City of Raleigh, we want to inform you that the EPA is conducting a preliminary review of the Metal Finishing 433 category. EPA solicits data and information regarding the discharge and treatment of metals, particularly chromium, nickel, and zinc, in addition to cadmium, copper, lead, silver, and any others, to POTWs by metal finishers, as well as any other information believed to be relevant to EPA's review. More information about the Metal Finishing Effluent Guidelines can be found at the link below:

<https://www.epa.gov/eg/metal-finishing-effluent-guidelines>

Additionally, we are working together with several local industries in response to an April 11, 2016 EPA Memorandum which clarified its stance on zirconization, ruling it a categorical coating operation. We look forward to building a relationship with these new industries as we move through the permitting process.

NC Department of Environmental Assistance and Customer Service

If you were able to attend last year's City of Raleigh Industry Day on December 8, 2015, you heard a presentation from two members of the NC-DEACS team. With their input, we would like to give you a brief summary of the many services that this group can offer, as well as a few links which may help you in waste reduction and recycling at your place of business.

NC-DEACS is a non-regulatory branch within the NC Department of Environmental Quality which offers a range of environmental services that you may find useful. Services include but are not limited to: recycling and waste reduction assistance; environmental technical and permit assistance specific to citizens, businesses, local governments and various industry types; free onsite energy and water use audits; small business advocacy; recognition of commitments to continual environmental performance; facilitation of financing and tax credits for recycling businesses; coordination of exchange markets for reusable materials; express permitting coordination, and development of sustainability plans and environmental management systems.

More specifically, NC-DEACS offers two great tools that may help you in your recycling and waste reduction efforts: Recycling Markets Directory and NC Wastetrader.

The Recycling Markets Directory is a tool to help you find an outlet for your recyclable materials. You can search by type of material or the name of the recycling company.

<http://www.p2pays.org/dmrm/start.aspx>

NC Wastetrader is a marketplace swap for discarded or surplus materials and products. Think of it as a waste exchange service. Your waste may be another person's feedstock.

<http://www.ncwastetrader.org/>



Please take advantage of the tools that NC-DEACS offers to reduce waste and promote recycling at your business. You can find them online with a quick search or contact them at 877-623-6748.

For information concerning the City of Raleigh Industrial Pretreatment Program, please feel free to contact us:

Ryan Faw, Industrial Pretreatment Coordinator, 919-996-3679, ryan.faw@raleighnc.gov

Neuse River Resource Recovery Facility, 919-996-3700

Robert Massengill, Public Utilities Director, 919-996-4540, robert.massengill@raleighnc.gov



www.raleighnc.gov