NACWA Roundtable Discussion

Developing Effective Pretreatment Working Relationships

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Developing Effective Pretreatment Working Relationships

Being a Pretreatment Professional is a High Wire Balancing Act!!!

- **Need to Comply with all EPA & State Regulations!**
- **Need to Enforce Your Regulations!**
- **Need to Protect Your Facilities!**
- **Need to Get It All Done, AND**
- **You Need to Develop and Maintain Good Working Relationships with Everyone!**

The Pretreatment Inspector

"I don't get no respect!!!"

Developing Effective Pretreatment Working Relationships

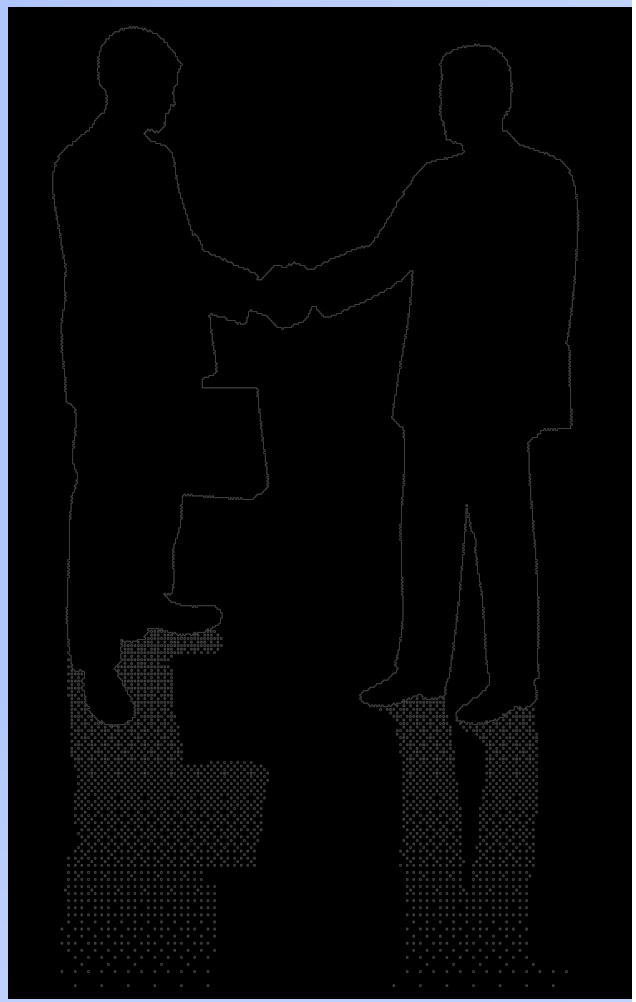
How Can an Environmental Enforcer Maintain Good Working Relationships?

- **Need to be a Good Communicator**
- **Need to be Somewhat Politically Savvy and Politically Astute!**
- **Need to Think BEFORE you Speak**
- **Need to Think about the possible ramifications of what you say!**
- **Need to Know the Players you are interacting with**

Developing Effective Pretreatment Working Relationships

Who Are the Players We Deal With???

- *EPA & State Regulators*
- *Executive Director, Board or Directors, Commissioners, Division Directors, Etc.*
- *Coworkers – Plant, Interceptor & Lab Managers, Supervisors, Staff…*
- *Industrial Users & User Groups – Your Customers!!!*
- *Political – Mayor, Governor, City Council, Economic Development Agency, Environmental Advocacy Groups, More…*



Developing Effective Pretreatment Working Relationships

- **We Deal with Internal and External Customers Daily**
- **Sometimes these Interactions result in Complaints**
- **Our Goals are to meet NPDES Permit requirements, protect and improve the environment, without our customers complaining about us.**
- **This can be achieved by:**
  - **good communications with customers**
  - **educating our customers**

Example #1 - Working Relationship with a User Group – Dental BMP

- **NBC Dental Mercury BMP Program**
- **When the program was proposed dentists fought "tooth and nail"**
- **BMP program offered 2 alternatives: Achieve full permit compliance with Hg Limit or Install an Amalgam Separator**
- **Worked with the RI Dental Association throughout the process to educate the Association and the Dentists**

NARRAGANSETT BAY COMMISSION

ENVIRONMENTAL BEST MANAGEMENT PRACTICES for the Management of Waste Dental Amalgam

The Narragansett Bay Commission (NBC) has developed the following set of Environmental Best Management Practices (BMPs) for the Management of Waste Dental Amalgam to help the dental community safely and economically reduce the amount of mercury released into the environment. Dental facilities serviced by the NBC have two procedural options available to them regarding the proper management and compliant discharge of dental process wastewater to the NBC sewer system.

Dental facilities choosing Option 1 must install, use and maintain an amalgam separator with a separation efficiency of 99% when tested according to ISO 11143 standards and must demonstrate compliance with the "Mandatory" portion of the enclosed BMPs. Dental facilities choosing Option 1 will be excluded from conducting costly end-of-pipe wastewater sampling monitoring requirements.

Dental offices utilizing Option 2 are not required to install an amalgam separator but will be required to implement all other applicable Mandatory BMPs, and will be required to monitor and sample their process wastewater discharges on a regular basis in order to demonstrate continuous compliance with all applicable NBC discharges limits.

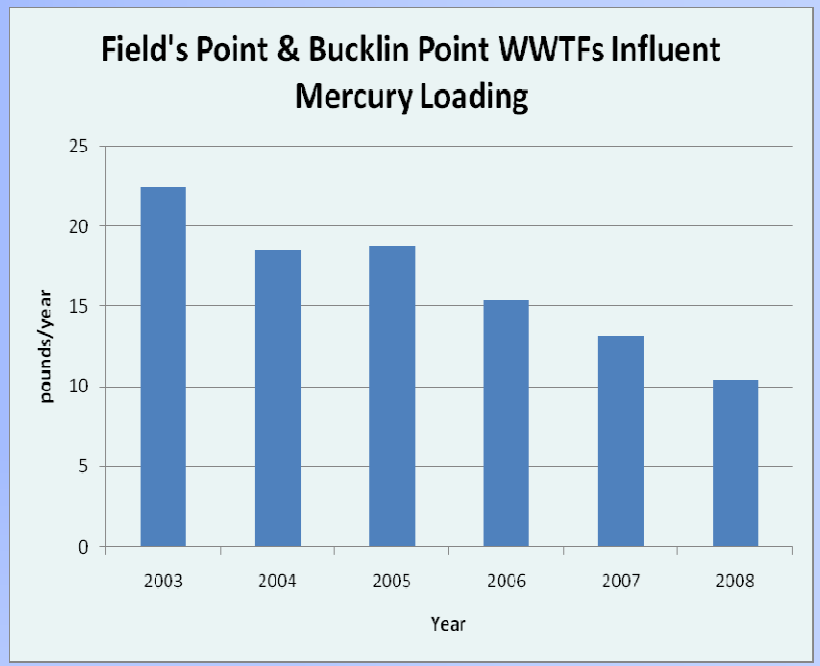
The NBC strongly encourages the use of ISO 11143 certified amalgam separators (Option 1). These separators help to remove most mercury from dental wastewater without being overly burdensome to operate or maintain. Based on NBC's current discharge limit for mercury, as little as 1/10,000 of a gram of amalgam in one gallon of wastewater would place your office in non-compliance resulting in additional sampling and monitoring costs. Continued non-compliance with NBC discharge limits can result in having your name published in the newspaper as being in significant non-compliance and/or the issuance of fines and penalties.

Example #1 - Working Relationship with a User Group – Dental BMP

- **NBC Held Educational Workshops for the Dentists**
- **A Vendor Exposition of approved amalgam separators was set up at each workshop**
- **Staff manned tables to assist Dentists to complete paperwork**
- **100% of Dentists in 10 Cities and Towns Installed ISO 11143 Amalgam Separators**

Example #1 - Working Relationship with a User Group – Dental BMP

- **The NBC Dental BMP Program has been a huge success**
- **Hg Loadings to Field's Point WWTF reduced 58% since 2003, 15% in 2008 alone**
- **Hg Loadings to the Bucklin Point WWTF Reduced 44% since 2003, 31% in 2008**
- **Overall Influent Hg Loadings to NBC Reduced 54% since 2003**
- **State of Rhode Island has adopted NBC BMP Program statewide**



Example #1 - Working Relationship with a User Group – Dental BMP

State of Rhode Island and Providence Plantations
OFFICE of the GOVERNOR

The Governor
of the
State of Rhode Island
Extends His
Greetings and Best Wishes to the

Narragansett Bay Commission

In Recognition of
implementing Environmental Best Management Practices in its Management of Waste Dental Amalgam program, which addresses a significant source of mercury emissions in Rhode Island. NBC's achievements in this area demonstrate a commitment to the environment and the health and public safety of all Rhode Island residents.

In recognition whereof, I have hereby set my hand and caused the Executive Seal of the State of Rhode Island and Providence Plantations to be hereunto affixed this 24th day of September 2004.

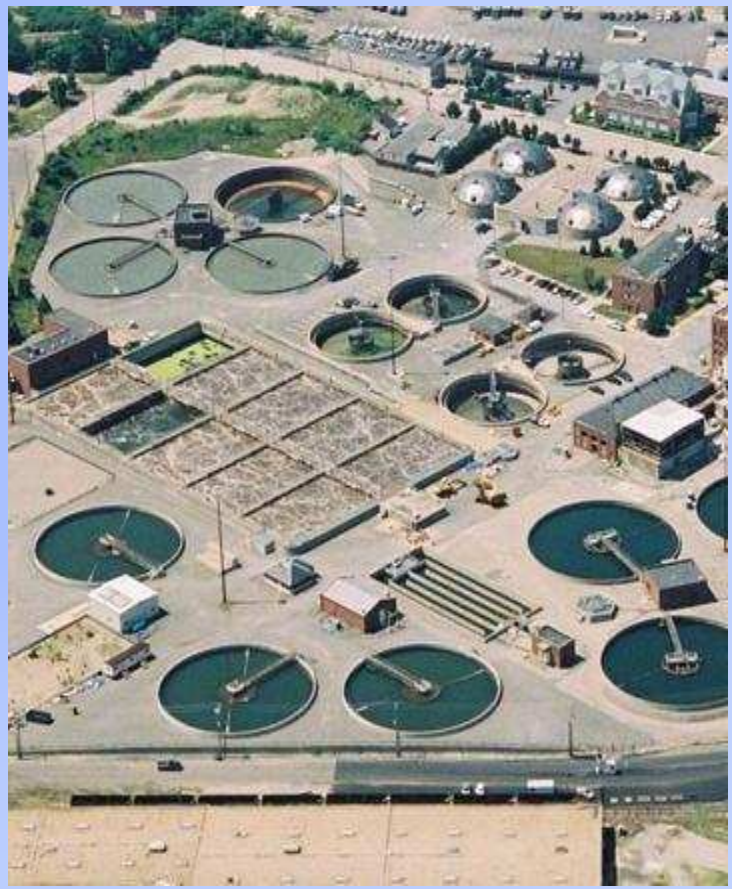
Donald L. Carcieri
Governor

☆ **Governor's Citation**

☆ **NACWA National Environmental Merit Award**

Example #2 - Working with an Internal Customer – WWTF Manager

- **Plant was experiencing some upset in the biology of the facility**
- **Turbid, cloudy effluent, poor settling of sludge, but in compliance**
- **Manager attributed the treatment problems to "something in the influent", a Pretreatment issue**
- **Plant staff were frustrated with Pretreatment**
- **This unsubstantiated cause was documented in Ops monthly reports**



Example #2 - Working with an Internal Customer – WWTF Manager

- **Lab data showed nothing unusual in the influent – No Toxics!!!!**
- **Pretreatment staff were frustrated they could not find the toxic cause and were noted by Operations as the cause in the monthly report**
- **Pretreatment staff investigated the WWTF thoroughly, collecting samples everywhere**
- **Samples revealed that the WWTF operators were the cause**
- **The Return Activated Sludge was being over chlorinated**

Some Thoughts for Discussion

- **Good Communication is essential to developing and maintaining Effective Working Relationships**
- **Think things through, research and investigate the problem and develop a good game plan**
- **Know your Customer – The Restaurant owner you give an overly hard time this afternoon will be pouring a glass of wine for the Mayor tonight! Someone's phone will ring!**
- **Educate your Customers - Education is key for effective working relationships and improved environmental compliance**
- **What do your customers think about the job you do? Gauge how you and your teams are doing. Conduct Internal and External Surveys and use the results to improve.**

Roundtable Panelists

Tim Downs - Environmental Compliance Supervisor

Charlotte Mecklenburg Utilities

Charlotte, North Carolina

Ray Fuentes – Environmental Compliance Manager

Coca-Cola Bottling Co. Consolidated

Charlotte, North Carolina

Mike Lingerfelt

Supervisor/ORC

Irwin Wastewater Treatment Plant

Charlotte, North Carolina