



North Carolina Department of Environment and Natural Resources

Division of Water Quality

Beverly Eaves Perdue
Governor

Charles Wakild, P. E.
Director

Dee Freeman
Secretary

February 10, 2012

MEMORANDUM

To: Modified Pretreatment Program Contacts
From: Deborah Gore, PERCS Unit Supervisor
Subject: Update of Pretreatment Annual Report (PAR) Requirements for Modified Programs

Dear Pretreatment Coordinators:

ALL Pretreatment Programs in North Carolina must send in their Pretreatment Annual Reports (PAR) by March 1st of every year. Two copies of the PAR should be sent to the Division's Central Office.

PARs from "Full" Pretreatment programs must follow the PAR Workshop Guidance Manual updated in January 2012. The Manual is posted on our website (<http://portal.ncdenr.org/web/wq/swp/ps/pret/parguide>) along with corresponding forms. For dates and locations of PAR workshops, information is attached and also on our website (<http://portal.ncdenr.org/web/wq/swp/ps/pret/training>).

ALL Modified Pretreatment Programs in North Carolina must send in a PAR or call to schedule a meeting with Division's Pretreatment staff by March 1st of every year. While modified pretreatment programs are encouraged to submit a complete PAR as described in the PAR Workshop Guidance Manual, they must submit information concerning all of the following:

1. A copy of the Pretreatment Program Info sheet and Historical SNC sheet (sent with the End of Year Mailing) with corrections marked.
2. A completed copy of Significant Non-Compliant Report (SNCR) forms for the calendar year. If you had no SIUs in SNC please write "none" on a blank form, date it and send it in. A copy of form is on our website.
3. If you have any IUs in SNC, any IUs that were Public Noticed in the previous calendar year, or any IUs that were placed on or completed items in a compliance schedule, consent order, or administrative order, you must also submit the following:
 - 3a. A narrative as described in PAR Workshop Guidance with a written explanation of what actions you have taken and what is being done to resolve each situation of an IU in SNC.

- 3b. A copy of any schedules issued to your IUs, and a description of progress to date with those schedules.
- 3c. A copy and affidavit of any Public Notice of IUs in SNC.
4. Pretreatment Performance Summary (PPS) form. This requirement was added to the Division's 106 workplan with EPA that the data be entered for all approved programs – it used to be just for the full programs. A copy of the form is on our website.
5. Copies of any additional information required by the Division's Regional Office related to Pretreatment Annual or Semi-Annual Reporting.

The Division's pretreatment program is still very committed to keeping the burden of paper work to a minimum. We will not request information that is not essential. The Division's PERCS Unit will also be providing you with feed back on how the requested information is being managed.

As stated in the State Pretreatment regulations 15A NCAC 2H .0908(c) "In lieu of submitting annual reports, Modified Pretreatment Programs may be required to meet with Division personnel periodically to discuss enforcement of pretreatment requirements and other pretreatment implementation issues." If any Modified Pretreatment Program would like to exercise this alternative to submitting a Pretreatment Annual Report (PAR), you must call and schedule a meeting with Division Pretreatment staff prior to March 1st of each year. During these meetings the Division will assist you in evaluating compliance, determining Significant Non-Compliance, check your enforcement activities, document proper implementation of the pretreatment regulations and gather necessary information to maintain our database.

Remember compliance judgment, SNC determination, and enforcement actions for sampling during the period January through June must be done by September 1 and for sampling during the period July through December must be done by March 1 of each year. Thank you, and if you have any questions or comments, please contact myself at (919) 807-6383 or via email [Deborah.Gore@ncdenr.gov].

cc: Central and Regional Office Pretreatment staff