

USEPA Audit

USEPA Region 5 conducted a Pretreatment Compliance Inspection (PCI) at our offices during the period of December 17 through December 19, 2018. As a result of the PCI, USEPA Region 5 required M&R's Industrial Waste Division (IWD) to implement various corrective actions by both the Field Services Section (FSS) and Pretreatment and Cost Recovery Section (PCRS) under IWD.

The FSS is currently undertaking a full review of its Standard Operating Guidelines (SOGs) for the purpose of making required revisions and updates pursuant to USEPA comments and suggestions. The FSS anticipates a 3-month timeline moving forward to review and update its SOGs. Subsequent to the review and updating of SOGs, all FSS staff will require additional training to reinforce the SOG revisions.

Based on the PCI, the PCRS is largely tasked with improving and revising its protocol and methodology for issuing discharge permits, the main administrative control mechanism employed to regulate Significant Industrial Users. Each permit contains a set of universal General Conditions (GCs) under which permittees may operate. Updates and improvements in permit GC language were required by USEPA.

In addition, similar improvements were required of permit Special Conditions (SCs), which are unique operational

requirements written into permits for specific pretreatment industrial categories or processes. Staff are currently discussing and implementing updates and improvements in SC language.

Finally, USEPA comments will require two minor, non-substantive amendments to the Sewage and Waste Control Ordinance (SWCO). Non-substantive amendments or revisions do not require a 30-day public comment period or formal approval by USEPA prior to implementation. The amendments are as follows:

1. Article III, Section 5 Title Heading Change:
"New or Increased Pollutant or Flow" shall be revised to **"New, Increased or Decreased Pollutant or Flow"**
2. Appendix C, Article III, Section 1 Industrial Category Addition:
Add **40 CFR 441, Dental Amalgam Industrial Point Source Category**
Final Rule Date **July 14, 2017**

Because additional non-substantive revisions will need to be made to the SWCO that are independent of USEPA's comments with regard to the PCI, we anticipate presenting the entire package of amendments to the Board of Commissioners for adoption by the end of 2019.

Ongoing Dental Community Outreach

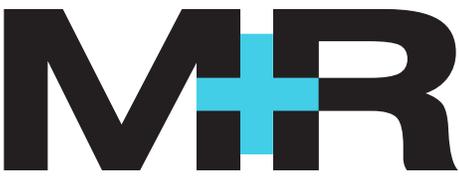
In order to effectively implement the USEPA's Dental Amalgam Rule, a One-Time Compliance Report for Dental Dischargers has been developed and made available on the MWRD website. To aid in the introduction of the MWRD to dental offices subject to the rule, the MWRD has entered into discussions with the Chicago Dental Society (CDS), the regional branch of the American Dental Association.

On March 13, 2018, MWRD representatives and the CDS met to discuss optimal ways to reach out to its member practitioners. As a result, the MWRD is now highlighted on the CDS website and is identified as the local control authority for amalgam rule compliance. The website lists a phone number and an email address for dental offices to contact the MWRD. In addition to the CDS website, the MWRD sent staff from the Monitoring and Research (M&R) Department's Industrial Waste Division (IWD) to two CDS regional meetings. At these meetings MWRD personnel staffed an information kiosk to introduce the MWRD as the control authority and distribute program documents and a certification form. An article written by MWRD staff was published in the July/August, 2018 issue of the CDS trade magazine, the *CDS Review*. The Dental Amalgam Rule will be a top agenda item for POTWs nationwide at this year's NACWA Pretreatment and Pollution Prevention Workshop in May in Tacoma, WA, at which IWD staff will be attending.



IWD has been in regular attendance at Chicago Dental Society Meetings. Our very knowledgeable staff presented program updates and handed out compliance documents.

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MWRD's Sewage and Waste Control Ordinance and User Charge Ordinance are available on MWRD's website at www.mwrdd.org.

CONTINUED COMPLIANCE REPORTS (RD-115)			
40 CFR	Industrial Category	First	Second
403	Non-Categorical	6/1	12/1
410	Textile Mills	3/2	9/2
413	Electroplating	4/27	10/27
414	Organic Chemicals, Plastics, Synthetic Fibers	5/5	11/5
415	Inorganic Chemicals Manufacturing	2/12	8/12
417	Soap and Detergent Manufacturing	6/10	12/10
419	Petroleum Refining	6/1	12/1
420	Iron and Steel Manufacturing	1/10	7/10
421	Nonferrous Metals Manufacturing	3/9	9/9
423	Steam Electric Power Generating	1/1	7/1
425	Leather Tanning and Finishing	5/25	11/25
430	Pulp, Paper, and Paperboard	1/1	7/1
433	Metal Finishing	2/15	8/15
437	Centralized Waste Treatment	6/22	12/22
439	Pharmaceutical Manufacturing	4/27	10/27
442	Transportation Equipment Cleaning	2/14	8/14
455	Pesticide Chemicals	4/4	10/4
463	Plastic Molding and Forming	1/30	7/30
464	Metal Molding and Casting	4/30	10/30
465	Coil Coating	6/1	12/1
466	Porcelain Enameling	5/25	11/25
467	Aluminum Forming	4/24	10/24
468	Copper Forming	2/15	8/15
469	Electrical and Electronic Components	1/14	7/14
471	Nonferrous Metals Forming	2/23	8/23

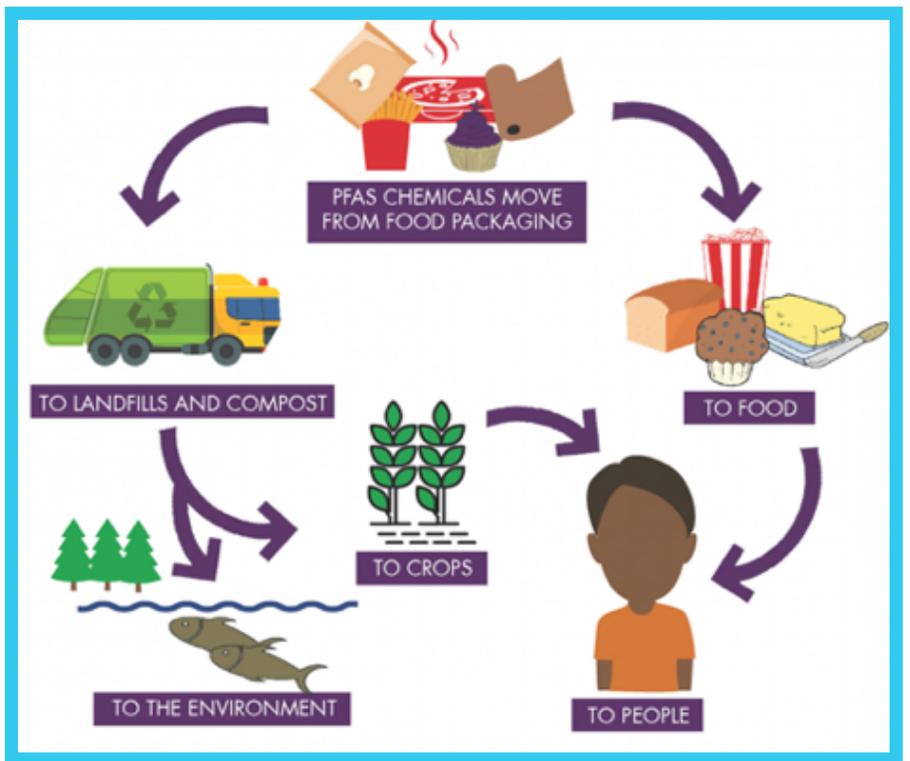
What are PFAS Chemicals? What We Need to Know

Per- and polyfluoroalkyl substances (PFAS) are a family of potentially thousands of synthetic chemicals that are persistent in the environment and in our bodies. PFAS can be found at trace levels in our food, drinking water and overall in the community we live (as shown in the picture) due to their widespread use as a chemical coating element on many household and workplace products and also via current waste disposal practices. As a result, the USEPA has been studying their presence in the environment and any adverse health effects they may cause.

PFAS have been highly utilized in various industrial and household applications because of their ability to repel oil and water. Teflon non-stick cookware, water-repellent clothing and shoes, stain-resistant fabrics and carpets, cosmetics, cleaning products, food packaging, firefighting foams, and products that resist grease, water, and oil are all examples of products that include PFAS.

A growing body of science has found that there are potential adverse health impacts associated with PFAS exposure, including liver damage, thyroid disease, decreased fertility, high cholesterol, obesity, hormone suppression and cancer. One particular study found that more than 1,500 drinking water systems that serve nearly 110 million Americans may be contaminated with PFAS chemicals.

PFAS can be effectively treated with activated carbon filtration for drinking water purposes but are resistant to most conventional chemical and microbial clean-up technologies. In response, the USEPA set a health ad-

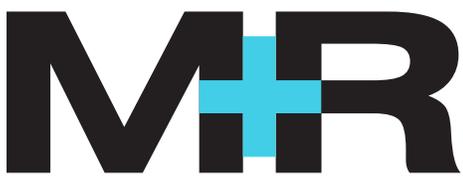


An illustrative picture showing PFAS in our community (Photo Credit: EXTERNH.GOV)

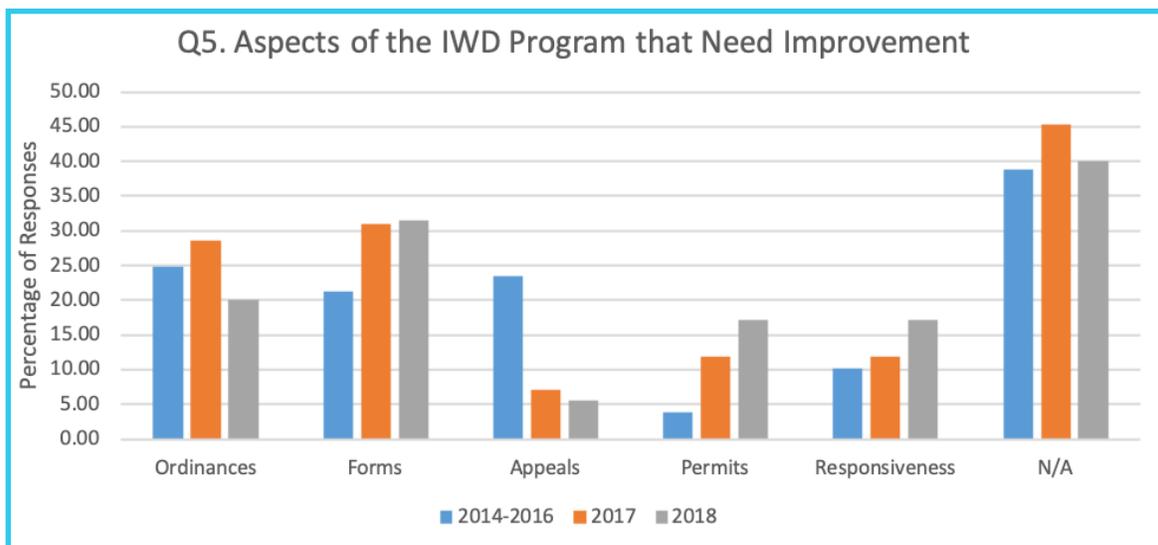
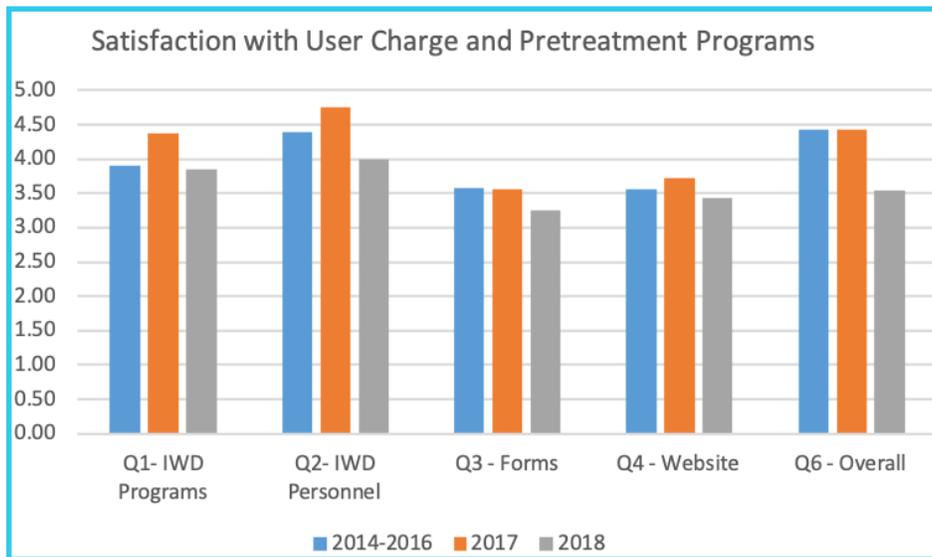
visory guideline in 2016 that limits PFAS exposure in drinking water. However, there is still no USEPA approved analytical method for PFAS measurement in non-potable waters.

Like prior emerging contaminants, PFAS contamination will be an area of focused regulatory action for the foreseeable future. The MWRD will continue to update its regulatory community as new information becomes available.

The USEPA maintains a webpage to update the public at www.usepa.gov/pfas. In addition, the Water Environment Federation has released research papers and on demand webinars on the same subject through their website www.wef.org.



Metropolitan Water Reclamation District 2018 User Satisfaction Survey Results



Survey Distribution

All Large Commercial-Industrial and Tax Exempt Users (over 900 Users) that were required to file a User Charge Annual Certified Statement (RD-925) were asked to complete a survey either online through SurveyMonkey.com or using a paper version. The number of responses received were as follows:

Year	Number of Responses
2014	22
2015	9
2016	26
2017	49
2018	41

Survey Format

The 2014 and 2015 surveys were comprised of 5 questions. In 2016 through 2018, a 6th question was added and asked respondents to

rate their overall satisfaction. Questions 1 and 2 asked respondents to rate their satisfaction with IWD programs and personnel based on a scale of 1 to 5, with 1 being not satisfied and 5 being very satisfied. Questions 3 and 4 asked respondents to rate the degree of difficulty in completing the MWRD's User Charge and Pretreatment forms and navigating the MWRD's website based on a scale of 1 to 5, with 1 being difficult and 5 being easy. Question 5 asked respondents to select the two most important aspects of the IWD program that need improvement.

Survey Results

The 2018 results showed that respondents were overall satisfied with the interactions they had with the IWD staff and, in general, were satisfied with the User Charge and Pretreatment programs. The 2018 results indicated an average satisfaction with completion of the forms and navigating the MWRD's website. While the majority surveyed for the 2018 reporting year did not feel that anything should be improved, those that offered their suggestions felt that the forms and ordinances need improvement.

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