



ATTACHMENT C

August 21, 2012

Subject: Request for comments regarding the economic impact of proposed changes to Wisconsin's General Pretreatment Regulations (Wis. Admin. Code Chap.NR 211)

The Department of Natural Resources is conducting an economic impact analysis of its rule proposal, WT-28-10, that would reduce wastewater pretreatment regulations for regulated industries discharging to sanitary sewers (pretreatment industries) and for municipal wastewater treatment plants with industrial pretreatment programs. The Department is gathering information to determine if there is an economic effect of the proposed rule on specific businesses, business sectors, local governmental units, and the state economy as a whole. Information and advice is requested from businesses, business associations, local governmental units, and individuals that may be affected by the proposed rule.

Would you, your business, your association, or your local unit of government be affected economically if this proposed rule implemented the following?

- 1 Removed sampling requirements for wastewater pollutants, discharged by industries to sanitary sewers, shown to be neither present nor expected to be present in the discharge. (see proposed NR 211.15(4)(b))
- 2 Removed pretreatment sampling and reporting requirements for industries never discharging more than 100 gallons per day (gpd) of regulated industrial wastewater to the sanitary sewer. (NR 211.15(4)(d))
- 3 Reduced pretreatment sampling and reporting requirements (from twice per year to once per year) for industries which discharge less than .01 percent of the wastewater flow capacity of the municipal treatment plant they discharge to. (NR 211.15(4)(c))
- 4 Reduced pretreatment inspection requirements for municipal wastewater treatment plants with industrial pretreatment programs (from once per year to once per two years) when inspecting industries discharging less than .01 percent of the wastewater flow capacity of the municipal treatment plant they discharge to. (NR 211.235(3)(c))
- 5 Required municipal wastewater treatment plants with industrial pretreatment programs to repeat sampling at industries if a test result from the municipal sample exceeded a limit. (NR 211.15(7))
- 6 Allowed municipal wastewater treatment plants with industrial pretreatment programs to use a general discharge permit to regulate several similar industries rather than several individual discharge permits. (NR 211.235(1)(b))
- 7 Required municipal wastewater treatment plants with industrial pretreatment programs to include applicable Best Management Practices and slug control measures in industrial discharge permits. (NR 211.235(1)(am)(intro))
- 8 Required municipal wastewater treatment plants with industrial pretreatment programs to revise their sewer use ordinance and industrial permits to include the above changes and submit them to DNR for approval. (NR 211.30(7)(b))

The proposed rule may be reviewed at <http://dnr.wi.gov/org/water/wm/ww/pret> or <http://adminrules.wisconsin.gov>. To request this material in an alternative format, please call Robert Liska at (608) 267-7631 with specific information on your request by **September 15, 2012**.

If you expect to be affected economically by this rule proposal please provide as much information as possible to the department contact below regarding any implementation or compliance costs you would expect to incur, quantifiable benefits of the proposed rule, or how the proposed rule would negatively affect your overall economic competitiveness, productivity, or jobs.

Please do NOT submit comments on the revision to the rule at this time. After receiving comments on the economic impact of the rule, the department will prepare an economic impact analysis (EIA) for the proposed rule. Once the EIA process is complete, the department will submit the rule package and EIA to the Legislative Council and hearings on the proposed rule will then be held, in accordance with ss. 227.15, 227.17 and 227.19, Wis. Stats.

Please indicate whether you are responding as a business, small business, business association, local governmental unit, or individual. A small business is defined as an independently owned and operated business that is not dominant in its field and which employs 25 or fewer full-time employees or which has gross annual sales of less than \$5,000,000.

Comments are due and shall be postmarked or submitted electronically no later than **September 21, 2012**. Please provide your email address or phone number in order for the department to contact you if additional information is needed. Written comments on economic effects of the proposal may be submitted via U.S. mail or email to:

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