

Pretreatment Program Evaluation Report

City of Sheridan POTW

WY-0020100

Sheridan, Wyoming

November 7, 2023



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Pretreatment Evaluation Summary Table

City of Sheridan – Pretreatment Program Evaluation Report
WY-0020100
November 7, 2023

Pretreatment Audit Findings	Pretreatment Requirement and Corrective Action
<i>Section 4.0 – Industrial User Inventory and Characterization</i>	
1. 40 C.F.R. § 403.8(f)(2)(i-iii) of the Pretreatment regulations require the City to identify and locate all IUs in its service area, identify the character and volume of pollutants contributed by these IUs based on current information, and notify these IUs of applicable Pretreatment Standards and Requirements. The EPA performed facility inspections of two IUs within the City’s service area, Emit Technologies and L&H Industrial. Based on the observations of the facility inspections, both IUs perform processes defined as categorical under the Metal Finishing Point Source Category found in 40 C.F.R. Part 433. Based on information gathered during the evaluation and drive-by inspections, it appears that the City may have additional IUs in the service area subject to Categorical Pretreatment Standards or that may discharge non-domestic pollutants that may cause or contribute to Pass Through or Interference.	<u>Pretreatment Requirements</u> 40 C.F.R. § 403.8(f)(2)(i-iii) <u>Corrective Action Item</u> Submit a current IU inventory of the IUs in its service area for EPA to review. The IU inventory needs to be representative of current conditions in the service area to provide current characterization of the IUs (all non-domestic users, including restaurants/food service establishments, dental facilities, other potential users) on the inventory to identify flows and non-domestic pollutants that may impact the POTW and the collection system.

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1.0 Introduction

The U.S. Environmental Protection Agency, Region 8 (EPA) conducted an evaluation of the City of Sheridan (City) on November 7, 2023 to determine how to help the City with potential impacts to its POTW from the contribution of non-domestic pollutants, including the potential requirement to develop an EPA-approved Pretreatment program to control the contribution of non-domestic pollutants from industrial users (IUs).

The Pretreatment evaluation consisted of an overview of the City's service area and IUs contributing non-domestic wastewater to the City's Publicly Owned Treatment Works (POTW).

Participants in the audit included:

City of Sheridan, WY

Brian Edwards	Wastewater Treatment Plant Superintendent
Jason Neavill	Superintendent of Utility Maintenance Division
Jacob Martineau	Assistant Utilities Director

EPA

Al Garcia	Region 8 Pretreatment Coordinator
Stephanie Passarelli	ECAD NPDES Unit

The EPA on-site evaluation consisted of the following:

- Meeting with Mr. Edwards – Wastewater Treatment Plant Superintendent to discuss the City's POTW, service area, industrial users and known impacts from the contribution of non-domestic pollutants from the service area, including oil and grease from restaurants,
- On-site facility inspections:
 - Emit Technologies on November 7, 2023 @ 9:45 a.m., inspection report emailed on November 29, 2023.
 - L & H Industrial on November 7, 2023 @ 1:00 p.m. inspection report emailed on January 22, 2024.
- Reconnaissance drive-by inspection/evaluation of portions of the service area, including the airport business district.
- Introduction meeting with Mr. Jacob Martineau-Assistant Utilities Director and Jason Neavill – Superintendent of Utility Maintenance Division
- Discussion of the Pretreatment Regulations and implementation, including sampling, inspection, and grease interceptor inspection procedures.

2.0 Publicly Owned Treatment Works (POTW) Information

The City owns and operates a Publicly Owned Treatment Works (POTW) located at 393 Fort Road, Sheridan, Wyoming 82801. The POTW serves the boundary of the City. A POTW tour was not completed during the Pretreatment program evaluation. A narrative

description of the POTW was provided by Mr. Brian Edwards. The City's service area is shown in Figure 1 and the POTW is shown in Figure 2.

The influent to the plant comes from four (4) sanitary sewer trunk lines, one line from a northern lift station and three from gravity sewer lines. The four lines combine at the headwork's of the plant. The influent flow is directed through the Rotomat primary screening system to remove unwanted debris. The wastewater is directed through a rectangular chamber to measure flow rates and it then enters the Pista grit system for grit removal. The wastewater is pumped into the oxidation ditch for biological treatment. The 3.5-million-gallon oxidation ditch consists of three cells; the first cell is used for ammonia removal and the remaining two cells are used for aerobic treatment. The mixed liquor suspended solids are directed to one of the two rim flow clarifiers, where the effluent is removed, and the solids are returned to the oxidation ditch or wasted out of the system.

The plant has an average return activated sludge flow of 90-100% influent flow volume and wastes from 40,000 to 100,000 gallons per day to aerobic digesters. The treated wastewater effluent flows through a parshall flume to one of two chlorine contact chambers where sodium hypochlorite is used to disinfect the wastewater. The wastewater effluent is then de-chlorinated with sodium bisulfate before entering the effluent discharge wet well. After de-chlorination the effluent is either gravity fed or pumped to Goose Creek outfall 001.

Waste material that has been directed to the aerobic digesters is left to age for an average of 2-4 days for final digestion. Digested sludge is then pumped to the Charter belt press for dewatering. The 17-22% dry material is dumped into a dump truck and then transported to the city landfill to be used for compost production or cover in the active landfill cell.

Septage haulers discharge septage collected from septic tanks and their loads are discharged into the plant's headworks. Grease haulers discharge grease directly into a grease treatment facility and treated effluent is then redirected to the headworks of the wastewater plant for further treatment and the dry material produced from the facility is transported to the city landfill for disposal.

2.1 NPDES Permit – Pretreatment Language

Part III.B of the City's NPDES permit #WY-0020010, issued by the Wyoming Department of Environmental Quality (WYDEQ) contains provisions for Industrial Waste Management for municipalities without EPA-approved Pretreatment programs. The permit was effective on December 1, 2012 and expired on November 30, 2017.

2.1.1 NPDES Permit, Part III.B – Industrial Waste Management

Part III.B of the City's NPDES permit, issued by WYDEQ include the following Pretreatment language, in accordance with 40 C.F.R. § 122:

1. Industrial Waste Management

a) The Permittee is responsible for protecting Publicly-Owned Treatment Works (POTWs) from pollutants that would inhibit, interfere, or otherwise be incompatible with treatment

works operation, including municipal sludge use or disposal interference.

b) Pretreatment Standards (40 CFR Section 403.5) developed pursuant to Section 307 of the Federal Clean Water Act (the Act) require that the permittee shall not allow, under any circumstances, the introduction of the following pollutants to the POTW from any source of nondomestic discharge:

- i) Any pollutant that may cause Pass Through or Interference;
- ii) Pollutants that may create a fire or explosion hazard in the POTW, including, but not limited to, waste streams with a closed cup flashpoint of less than sixty (60) degrees centigrade (140 degrees Fahrenheit) using the test methods specified in 40 CFR Section 261.21;
- iii) Pollutants that may cause corrosive structural POTW damage, or discharges with a pH lower than 5.0 s.u., unless the POTW is specifically designed to accommodate such discharges;
- iv) Solid or viscous pollutants in amounts that may cause flow obstruction at the POTW, or other POTW operational interference;
- v) Any pollutant, including oxygen demanding pollutants (e.g., BOD), contained within any discharge at a volume and/or concentration that may cause POTW treatment process interference;
- vi) Heat in amounts that may inhibit POTW biological activity resulting in interference; or heat that causes POTW treatment plant temperatures to exceed forty (40) degrees Centigrade (104 degrees Fahrenheit) unless the Approval Authority, upon POTW request, approves alternate temperature limits;
- vii) Petroleum, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that may cause interference or pass-through at the POTW;
- viii) Pollutants that may result in toxic gases, vapors, or fumes within the POTW in quantities that may cause acute worker health and/or safety problems;
- ix) Any trucked or hauled pollutants, except at discharge points designated by the POTW; and
- x) Any specific pollutant that exceeds a local limitation established by the Permittee in accordance with 40 CFR Section 403.5(c) and (d). requirements.

c) EPA shall be the Approval Authority, mail all reports and notifications to the Approval Authority at: Office of Enforcement, Compliance, and Environmental Justice - Water (8ENF-W-NP), USEPA - Region VIII, 1595 Wynkoop, Denver, CO 80202. If the state is the delegated authority to implement and enforce the Pretreatment Program in the future, permittees shall be notified of the delegation and the **Wyoming DEQ/WQD** shall become the Approval Authority.

d) In addition to the general limitations expressed above, more specific Pretreatment Standards have been and will be promulgated for specific industrial categories under Section 307 of the Act (40 CFR Parts 405-471, 40 CFR chapter I, subchapter N.).

e) The Permittee shall notify the Approval Authority of any new introductions from new or existing industrial users or any substantial pollutant changes from any industrial user

within sixty (60) days following such introductions or changes, as required by 40 CFR 122.42(b)(1-3). Such notice shall identify:

- (i) Any new pollutant introductions at the POTW from an industrial user that would be subject to Sections 301, 306, and 307 of the Act if the POTW were directly discharging those pollutants; or
- (ii) Any substantial change in pollutant volume or character being introduced into the POTW by any industrial user;
- (iii) For the purposes of this section, adequate notice shall include the following information:

- (1) The industrial user's identity;
- (2) Pollutant nature and concentration in the discharge and average and maximum discharge volumes introduced into the POTW; and
- (3) Any anticipated quantity or quality effluent impacts upon POTW biosolids.

(iv) For the purposes of this section, a significant industrial user includes:

- (1) Any discharger subject to Categorical Pretreatment Standards under Section 307 of the Act and 40 CFR chapter I, subchapter N;
- (2) Any discharger with a process wastewater flow of 25,000 gallons or more per day;
- (3) Any discharger contributing five percent or more of the POTW's average dry weather hydraulic or organic capacity;
- (4) Any discharger designated by the Approval Authority as having a reasonable potential for adversely affecting POTW operation or for violating any Pretreatment Standards or Requirements;

f) When a specific pretreatment limitation becomes applicable to a permittee's industrial user, the **Wyoming DEQ/WQD** and/or Approval Authority may, as appropriate:

- (i) Amend the Permittee's **WYPDES** discharge permit to specify those additional pollutant(s) and corresponding effluent limitation(s) consistent with applicable Pretreatment Standards; or,
- (ii) Amend the Permittee's **WYPDES** discharge permit to require the Permittee to develop and submit an approvable Pretreatment program under a compliance schedule, in accordance with procedures in 40 CFR 403.8(e). Modification of a POTW's NPDES Permit for the purposes of incorporating a POTW Pretreatment Program approved in accordance with the procedure in §403.11 shall be deemed a minor Permit modification subject to procedures established in 40 CFR 122.63(g); or,
- (iii) Require the Permittee to specify, by ordinance, order, or other enforceable means, pollutant type(s) and the maximum amount(s) that the POTW may accept for treatment. Such requirements shall be imposed in a manner consistent with General Pretreatment Regulations under POTW program development requirements of 40 CFR Part 403; and/or,

- (iv) Require the Permittee to monitor its discharge for any pollutant that may likely be discharged from the Permittee's POTW, should the industrial user fail to properly pretreat its waste.
- g) The Approval Authority retains, at all times, the right to take legal action against any nondomestic discharge source, whether directly or indirectly controlled by the Permittee, for permit, order or similar enforceable mechanism violations issued by the Permittee, Pretreatment Standard or requirement violations, or for failure to discharge at an acceptable level under national standards issued by EPA under 40 CFR, chapter I, subchapter N. In those cases where a **WYPDES** permit violation has occurred due to permittee failure to properly develop and enforce Pretreatment Standards and requirements as necessary to protect the POTW, the Approval Authority shall hold the Permittee and/or industrial user responsible and may take legal action against the Permittee and the industrial user(s) contributing to the permit violation.

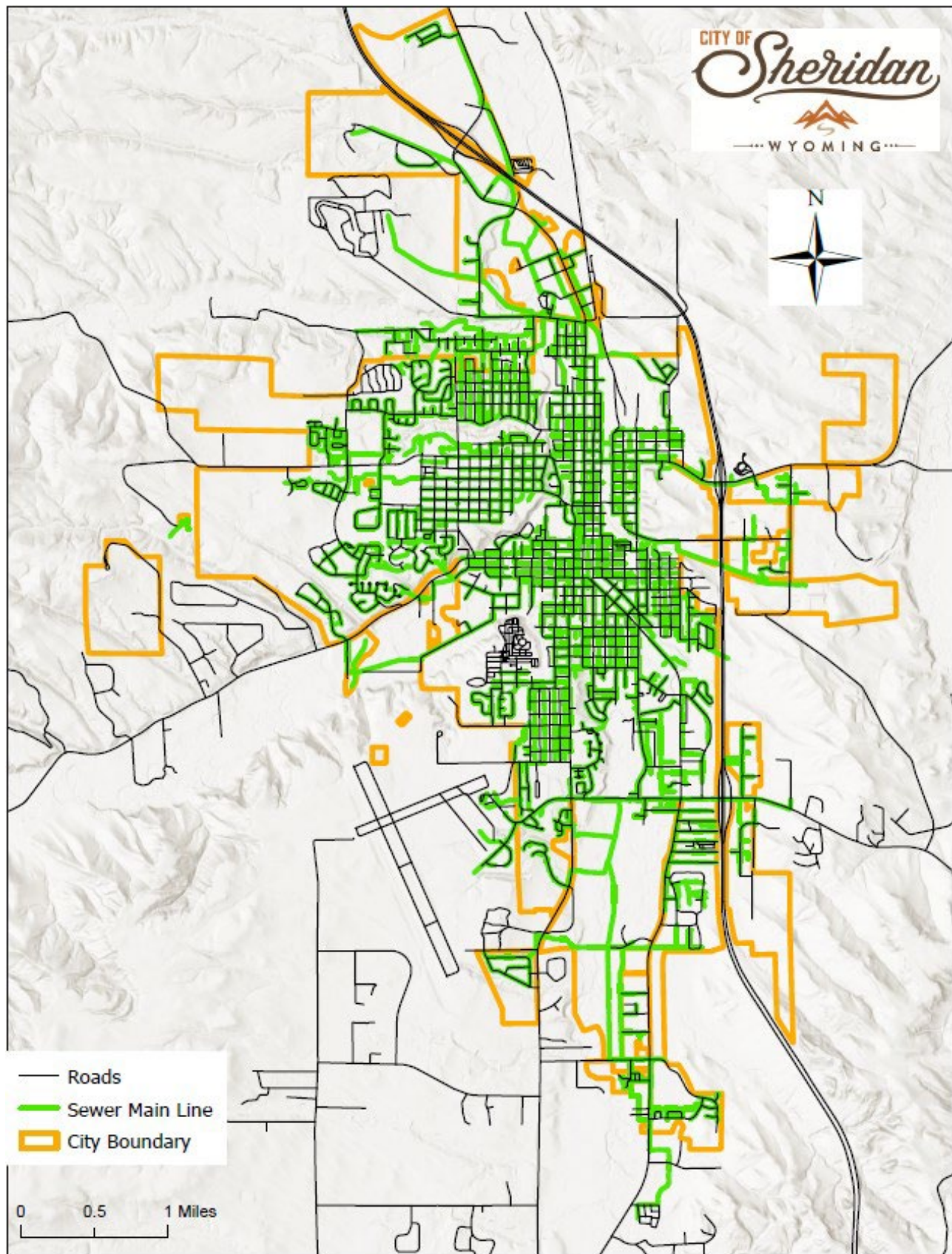


Figure 1 – City of Sheridan WY Service Area



Figure 2 – City of Sheridan POTW – Google Maps View

3.0 Evaluation of the City of Sheridan POTW

3.1 Regulatory Background

In 1972 Congress passed the Clean Water Act (CWA) to restore and maintain the integrity of the nation's waters. The goals of the CWA are to eliminate the introduction of pollutants into the nation's navigable waters and to achieve fishable and swimmable water quality levels. The CWA's National Pollutant Discharge Elimination System (NPDES) Permit Program represents one of the key components established to accomplish the goals of the CWA. The NPDES Permit Program generally requires that point source discharges of pollutants to waters of the United States, i.e., direct dischargers, obtain an NPDES permit.

In addition to addressing these direct discharges, the CWA also established a regulatory program to address indirect discharges from industries to publicly owned treatment works (POTWs) through the National Pretreatment Program, a component of the NPDES Permit Program. The National Pretreatment Program requires industrial and commercial dischargers, called industrial users (IUs), to obtain permits or other control mechanisms to discharge wastewater to the POTW. A Pretreatment permit designed to protect the POTW may require the IU to treat, manage or otherwise control pollutants in its wastewater before discharging it to a POTW.

Certain industrial discharge practices can interfere with the operation of POTWs, leading to the discharge of untreated or inadequately treated wastewater into rivers, lakes, and other waters of the United States. A discharge that causes interference inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use, or disposal and therefore causes a violation of any requirement of the POTW's NPDES permit. Some pollutants are not amenable to biological wastewater treatment at POTWs and can pass through the treatment plant untreated or partition into the sewage sludge or biosolids. This pass through of pollutants to the receiving water has the potential to cause fish kills or other deleterious effects or to the sewage sludge can inhibit the ability of the POTW to beneficially reuse its biosolids.

The General Pretreatment Regulations at 40 C.F.R. § 403.8(a) state that "Any POTW (or combination of POTWs operated by the same authority) with a total design flow greater than 5 million gallons per day (mgd) and receiving from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW or are otherwise subject to Pretreatment Standards will be required to establish a POTW Pretreatment Program. The Regional Administrator or Director may require that a POTW with a design flow of 5 mgd or less develop a POTW Pretreatment Program if he or she finds that the nature or volume of the industrial influent, treatment process upsets, violations of POTW effluent limitations, contamination of municipal sludge, or other circumstances warrant in order to prevent Interference with the POTW or Pass Through."

3.2 EPA Evaluation of City of Sheridan

EPA Region 8 continually evaluates municipalities without approved Pretreatment programs by reviewing the ICIS and ECHO databases to determine if these POTWs have experienced NPDES permit violations that may be attributable to pollutants from non-

domestic IUs. In addition, EPA evaluates information gathered from NPDES permit applications, fact sheets, annual reports, correspondence with State NPDES permitting agencies and other sources to track service area growth in these municipalities that may result in new or increased contributions from non-domestic IUs that have the potential to cause interference or pass through at the POTW or otherwise be subject to Pretreatment Standards and Requirements.

The EPA evaluated the City of Sheridan to determine if it receives contributions of non-domestic pollutants from IUs in its service area. In addition, the EPA evaluated the City's current efforts to protect its POTW from these contributions of non-domestic pollutants to determine how the EPA can help the City in these matters, including the need to develop an EPA-approved Pretreatment program, as required by 40 C.F.R. § 403.8(a). The determination for the requirement to develop an EPA-approved Pretreatment program under section 403.8(a) is based on two distinct inquiries: 1) whether one or more circumstances present a real possibility of interference or pass through; and 2) whether there is a nexus between the Pretreatment program and the possibility of interference or pass through.

4.0 Industrial User Inventory and Characterization

4.1 Regulatory Background

The Pretreatment Regulations state in 40 C.F.R. § 403.8(f)(2)(i-iii) that a POTW shall develop and implement procedures to ensure compliance with requirements of a Pretreatment Program. [These requirements are summarized after the regulation language in **bold** and *italics* font].

- i. "Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request." ***This requires a POTW to develop and maintain an inventory of IUs in the service area.***
- ii. "Identify the character and volume of pollutants contributed to the POTW by the Industrial Users identified under paragraph (f)(2)(i) of this section. This information shall be made available to the Regional Administrator or Director upon request." ***This requires a POTW to characterize the IUs in the inventory of the service area.***
- iii. "Notify Industrial Users identified under paragraph (f)(2)(i) of this section, of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act. Within 30 days of approval pursuant to 40 C.F.R. 403.8(f)(6), of a list of significant industrial users, notify each significant industrial user of its status as such and of all requirements applicable to it as a result of such status." ***These procedures must include the notification of IUs of applicable Pretreatment Standards and other applicable requirements.***

Pretreatment programs are required by the Pretreatment Regulations to identifying the IUs in their service area and outside contributing jurisdictions, by developing and maintaining

an inventory of IUs. In addition, the Pretreatment Regulations require a Pretreatment program to characterize the IUs listed on the inventory and notify the IU of their status under the Pretreatment program. For example, the following characterizations may apply to an IU, based on information received from questionnaires, drive-by or facility inspections:

- The IU is not characterized as significant, based on volume and characteristic of the discharged wastewater.
- The IU is characterized as significant and issued a permit.
- The IU is not characterized as significant, but loadings need to be controlled using BMPs in a source control program.
- The IU is generating wastewaters that are significant but is characterized as a zero-discharging facility.

The **Industrial Waste Inventory and Characterization** or industrial waste survey (IWS)/IU inventory procedures are an important component to an effective Pretreatment program because this is a POTW's first exposure to the IUs, allows the POTW to determine if an IU is significant, notify the IU of its status under the Pretreatment regulations, and determine the appropriate type of control mechanisms for these facilities to protect the POTW and collection system.

4.2 Industrial User Database of the City's Service Area

40 C.F.R. § 403.8(f)(2)(i-iii) of the Pretreatment regulations require the City to identify and locate all IUs in its service area, identify the character and volume of pollutants contributed by these IUs based on current information, and notify these IUs of applicable Pretreatment Standards and Requirements.

The EPA performed facility inspections of two IUs within the City's service area, Emit Technologies and L&H Industrial. Based on the observations of the facility inspections, both IUs perform processes defined as categorical under the Metal Finishing Point Source Category found in 40 C.F.R. Part 433. Based on information gathered during the evaluation and drive-by inspections, it appears that the City may have additional IUs in the service area subject to Categorical Pretreatment Standards or that may discharge non-domestic pollutants that may cause or contribute to Pass Through or Interference.

The City needs to submit a current IU inventory of the IUs in its service area for EPA to review. The IU inventory needs to be representative of current conditions in the service area to provide current characterization of the IUs (all non-domestic users, including restaurants/food service establishments, dental facilities, other potential users) on the inventory to identify flows and non-domestic pollutants that may impact the POTW and the collection system.

The City's development and submittal of a current industrial user inventory will help the EPA determine if a nexus exists between the potential for pass through or interference at the POTW and the Pretreatment program because the industrial wastewater discharges from these IUs are subject to either the Categorical Pretreatment Standards developed by

EPA or are subject to the Pretreatment Standards incorporated in the City’s municipal ordinance (i.e., general and specific discharge prohibitions found in 40 CFR 403.5).

The EPA currently provides “Pretreatment 101” webinar training, and a training for “Industrial User Inventory and Characterization Procedures,” provided in September 2010, is archived at the following website:

<https://www.epa.gov/npdes/national-pretreatment-program-events-training-and-publications#pretreat101>

5.0 Resources

5.1 Resources Regulatory Background

The Pretreatment Regulations found in 40 C.F.R. § 403.8(f)(1-6) include POTW Pretreatment requirements and procedures to implement an approved Pretreatment program. These requirements and procedures include the legal authority and the implementation procedures of the Pretreatment program (permitting, inspections, sampling, industrial waste survey, receipt of IU reporting and notification, record-keeping, slug discharge control, data evaluation and enforcement for non-compliance). In addition, the Pretreatment Regulations found in 40 C.F.R. § 403.8(f)(3) state that the POTW shall have sufficient resources and qualified personnel to carry out the authorities and implementation procedures of the Pretreatment program.

A Pretreatment program, in compliance with the criteria listed in the Pretreatment Regulations, requires adequate and qualified staffing to implement the Pretreatment program in its service area. The resources required for each implementation activity depend largely on the size of the service area, number of IUs/SIUs/sector control programs, and Pretreatment program policies. A compliant program also requires a consistent funding mechanism to ensure the program is adequately funded and equipped to fully implement the program.

5.2 Evaluation of the City’s Resources and Funding

Based on the EPA’s evaluation of the service area, it appears that the City has significant industrial users contributing non-domestic pollutants to the POTW. The EPA is currently evaluating the City to determine if an EPA-approved Pretreatment program is required, however, the EPA strongly recommends the City, at a minimum, develop a staffing plan for personnel to implement the Pretreatment Program based on the following justification:

- Based on the EPA’s inspections of Emit Technologies and L&H Industrial on November 7, 2023, these facilities generate process wastewaters regulated by the Metal Finishing Categorical Pretreatment Standards found in 40 C.F.R. Part 433. As a result, the EPA will develop control mechanisms for each facility to ensure they manage or treat the regulated wastewater in compliance with the Federal Regulations to protect the City’s POTW, defined as the wastewater treatment plant and collection system. The EPA will collaborate with the City during development of the control mechanisms and to perform annual inspections and sampling are

completed at each facility.

- The development and submittal of the IU inventory is required as a follow-up to this evaluation report. As stated in Section 4.0 of this report, the IU inventory is required to be maintained to ensure current conditions in the service area (new industries, changes to existing industries are captured in the inventory). Maintenance of the IU inventory includes collaboration with internal City department such as Community Service, Building/Engineering, Code Enforcement and may include updated surveys or facility inspection/sampling events.
- Control of the oil and grease generated from food service establishments (FSE) in the service area. Adequate control of oil and grease loadings will benefit the City in controlling costs to treat the oil and grease at the POTW, ensuring the FSEs in the service area are installing appropriately sized grease interceptors and are maintaining the interceptors.
- The Pretreatment Regulations at 40 C.F.R. § 403.8(f)(3) state that the POTW shall have “*sufficient resources and qualified personnel to carry out the authorities and procedures*” of the Pretreatment program. Based on the EPA’s evaluation of the City and the current contribution of non-domestic pollutants to the City, it appears that an approved Pretreatment program will be necessary. It would be beneficial to the City to begin evaluating adequate resources/personnel to implement a program.

5.3 *Examples of Available Pretreatment Training/Compliance Assistance*

The EPA is available to help with training and compliance assistance to the City. In addition, there are opportunities for training and peer communication within Region 8. The EPA recommends the City seek out training and resources that will support its efforts to protect its POTW through implementation of a Pretreatment program.

The Region 8 Pretreatment workshop provided by Region 8 Pretreatment Association provides training sessions directly related to Pretreatment implementation, updates to upcoming regulations and policies, and networking opportunities.

The EPA provides “Pretreatment 101” webinar training designed to provide consistent national training to local and state Pretreatment programs. The webinar series is located at <https://www.epa.gov/npdes/national-pretreatment-program-training-and-webinar>.

Archived presentations may be downloaded, and a schedule of future training opportunities is located at the website.

An additional resource available is the Pretreatment Coordinators Group discussion forum, found at the following website:

<https://groups.io/g/Pretreatment/topics>