



Ashworth Leininger Group Statement of Qualifications Pretreatment Program Support Services

Ashworth Leininger Group (ALG)'s Pretreatment Program support services practice focuses on assisting municipal and industrial facilities to comply with federal, state, and local Pretreatment Program requirements. ALG is an environmental consulting firm based in Camarillo, California, providing regulatory compliance expertise in air, water, and waste media. We support a broad spectrum of nation-wide clients, including municipalities, agencies, trade associations, and industry. Our team of engineers and scientists develop tailored solutions to meet clients' needs while improving overall program performance and efficiency. Our vision is not simply to help our clients to comply with environmental regulations, but to design compliance strategies to optimize our clients' objectives and achieve significant environmental benefits.

To support our clients, we have assembled a team with direct experience in pretreatment program development and assessment. Our qualifications are described further below.

Description of Experience

Pretreatment Program support requires expertise in municipal wastewater pretreatment program development and compliance, including experience with foundational program materials that include legal authority and agreements, local limits, enforcement response plan, as well as permitting, inspection, monitoring, and reporting procedures. The ALG pretreatment program team's specific experiences in these areas are as follows:

- *Municipal Wastewater Pretreatment Compliance Audits/Inspections:* ALG staff has conducted over two hundred pretreatment compliance inspections and audits (PCIs/PCAs) on behalf of the U.S. Environmental Protection Agency (EPA) and the State of California. PCIs and PCAs were performed in every Regional Water Quality Control Board area in California. These PCIs/PCAs included review and analysis of pretreatment program documents that include program submission packages, sewer use ordinances, multi-jurisdictional agreements, enforcement response plans and guides, slug discharge control plans, and local limits evaluations. Detailed reports identified program deficiencies and areas for improvement. Staff provided ongoing technical support to address these noted issues.
- *National Pretreatment Program Development and Implementation:* ALG staff has contributed to the development of the 2005 "Streamlining Rule" update to the general pretreatment regulations. Team staff has also participated in the

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development of many National Pretreatment Program guidance documents, including the Streamlining Rule fact sheet series, the Pretreatment Compliance Audit Checklist and Instructions, and the Local Limits Guidance Manual, and presented national, state, and local workshops and trainings on these topics.

- *Industrial Wastewater Pretreatment Compliance Programs:* ALG staff routinely provides direct support to municipal and industrial clients in managing their wastewater programs. Project experience ranges from overall program compliance, such as performing self-audits or gap analyses of facilities' regulatory compliance obligations, to targeting specific issues, such as developing sampling standard operating procedures or determining appropriate operational best management practices (BMPs). ALG staff routinely assists industrial clients with obtaining National Pollutant Discharge Elimination System and indirect discharger permits. In addition, ALG develops guidance materials and integrates these tools into our client's compliance programs to ensure ongoing compliance with permit requirements. These compliance materials/programs include operations and maintenance, self-monitoring, BMPs, record-keeping/reporting procedures, etc. Where needed, ALG develops adult-based training programs that translate applicable regulatory obligations (including air/wastewater/ hazardous materials/ waste) into discrete compliance actions for facility staff and management.

Pretreatment Program Team

ALG staff committed to general pretreatment program support include industrial wastewater regulatory experts with direct experience on application of federal, state, and local requirements and policies to municipal wastewater treatment facilities. ALG staff has broad knowledge of common program problems and pitfalls - including identification and proper classification of industrial users; adequacy of user permits, documentations, and reporting procedures; scope and basis to support local limits, etc. This practical experience allows ALG staff to identify potential compliance issues, but more importantly, to craft resourceful solutions and partner with our clients to implement corrective actions on time and within budget. We note that ALG continues to partner with some of the same clients that helped form our company over twenty years ago. Resumes of the pretreatment program team are available upon request.