

## Town of Siler City Moratorium Overview 8/18/2022

On May 6, 2022, the North Carolina Department of Environmental Quality, Division of Water Resources (NCDEQ), sent a letter to the Town of Siler City issuing notice of intent to impose a statutory moratorium on the Siler City wastewater treatment plant (WWTP). This moratorium became effective in late June, 45 days from the receipt of the notice.

The moratorium is required by NCDEQ due to numerous violations of the NPDES permit by the Siler City Wastewater Treatment Plant (WWTP) as reported in Discharge Monitoring Reports and facility inspections by NCDEQ.

This moratorium will remain in effect until the Town of Siler City has sufficiently demonstrated to NCDEQ's satisfaction that it can adequately treat wastewater flowing to the Siler City WWTP and is issued written notification from the Division of the lifting of this moratorium.

The moratorium prohibits the introduction of any additional waste to the collection system tributary to the WWTP. This is to be interpreted as to prohibit: (a) issuance of permits for new sewer lines to be connected to the WWTP, (b) permitting any new taps to the existing collection system, and/or, (c) introduction of significant volumes of new wastewater flow via existing taps (subject to the provisions of the statute).

Siler City took immediate steps upon receiving the notice and engaged the assistance of engineering consultants in developing an action plan to achieve regulatory compliance and restore the ability to introduce new wastewater flow necessary to serve new development.

An action plan has been developed for review with NCDEQ. This action plan, with an aggressive timeline of 90 days, includes steps to optimize performance of the Siler City WWTP and the Siler City Water Treatment Plant. It also includes plans to more closely monitor discharge by existing significant industrial users and increases fines/surcharges for violations. These combined actions are aimed to achieve substantial compliance with regulations.

We are working diligently to find agreement with NCDEQ on the path forward. Three productive meetings have already been held with NCDEQ staff to review requirements for lifting the moratorium. The path DEQ presented at the first and second meetings was for Siler City to apply for a Special Order of Consent (SOC). The short-term action plan includes operational improvements and minor capital improvements to be implemented quickly.

An SOC would allow Siler City and DEQ to review remaining concerns and agree on capital improvements needed to address those concerns. This agreement is expected to provide a clear path including schedule to complete improvements and fully lift restrictions to deliver certainty for Siler City.