

Resolution No. CWA 2-2011 - Crosswalk Table: Revised Resolution to Origin Section in Current Resolution

Resolution Section	Current Section Number	New Proposed Section Number	New Addition to Resolution	Required by the U.S. EPA Model Pretreatment SUO?	Comments
Chapter 1. Purpose and Policy; Definitions; General Requirements					
Purpose and policy	1.1	1.1	N		
No Conflicts with Terms & Conditions of Service	New	1.2	Y		Clarify relationship between IURC-approved Terms & Conditions and this Resolution for users
Rules and regulations and revisions therein	1.15	1.3	N		
Regulatory authority	1.7	1.4	N		Changed section title to reflect actual content in section. Includes merged of Section 1.6 State and Federal Requirements with Section 1.7; contains additional language recommended during prior program review by counsel
Abbreviations	1.2	1.5	N	Yes	Split from Sec. 1.2
Definitions	1.2	1.6	N	Yes	
Language Construct	New	1.7	Y		
Chapter 2. Requirements Applicable to All Users of the CWA Authority POTW					
Certain discharges to the sewer system are prohibited	1.4	2.1	N	Yes	
Noncategorical ("Local") Discharge Limits	1.4	2.2	N	Yes	Split from Sec. 1.4
Monitoring Procedures	Various	2.3	N		Consolidates related language from Section 1.4(c), Section 3.3(b), and Section 3.4(a) .
Right of entry and inspection	1.14	2.4	N	Yes	
Discharge of hazardous wastes	3.13	2.5	N	Yes	
Restrictions on dilution	1.8	2.6	N	Yes	
Protection against accidental discharge and slug discharges	1.9	2.7	N	Yes	
Plan to control slug discharges	1.10	2.8	N	Yes	
Permission to discharge is subject to limitations	NEW	2.9	Y		
Liability for damage	1.11	2.10	N		
Emergency suspension of right to discharge non-domestic wastewater	3.6	2.11	N	Yes	
Monitoring devices and metering equipment	1.13	2.12	N	Yes	
Recordkeeping requirement	1.22	2.13	N	Yes	
Prohibition against false statements and tampering	2.1(b)	2.14	N	Yes	Style change only to this language.
Confidential information	3.5	2.15	N	Yes	
Signatory requirements and certifications	1.24	2.16	N	Yes	Combined Section 1.24, 3.4(e), and 3.11

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Chapter 3. Permits, Agreements, Registrations, and Notifications					
Wastewater surveys may be required	NEW	3.1	Y		40 CFR 403.8(f)(2)(i) requires Pretreatment Control Authorities to "identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program...."
Industrial discharge permit may be required	2.1(a)	3.2	N	Yes	Clarified language to indicate which users may be required to obtain an IDP
Special discharge agreements may be required	1.12	3.3	N		
Wastewater hauler registration	4.1	3.4	N	Yes*	
Special provisions for dental offices	NEW	3.5	Y		Elevating obligations under Dental Amalgam ELG for dental offices who may not have visibility to regulatory obligations
Term of permit, agreement or registration	2.3	3.6	N	Yes	SDA and Wastewater hauler approval terms are not new; language documenting standard practice
Nonassignability	2.7	3.7	N	Yes	Language at 3.7(b)(3) added in response to 2025 EPA PCI finding
Revocation	3.7	3.8	N	Yes	Consolidated wastewater hauler revocation provisions in Sec. 4.7 with this Section.
Notice of revocation	3.8	3.9	N	Yes	
Appeals	1.21	3.10	N		
Fees	2.6	3.11	N		Contains revised fees for various approvals that may be issued by CWA Authority; clarifies that rates and charges pursuant to Terms & Conditions of Service may also apply
Chapter 4. Industrial Discharge Permits					
Application requirements	2.2	4.1	N	Yes	Compliance schedule language from 2.2(a)(13) moved to new section
Industrial discharge permit conditions	2.4	4.2	N	Yes	
Pretreatment	3.1	4.3	N		
Permit modifications	2.5	4.4	N	Yes	
Obligation to notify	1.4(j)	4.5	N	Yes	Split from Sec. 1.4
Submission of self-monitoring reports	3.10	4.6	N		
Violation of permit requirements	3.12	4.7	N		
Bypass	3.14	4.8	N	Yes	
Removal Credits	1.5	4.9	N		
Baseline report	1.23	4.10	N	Yes	
Compliance schedules	2.2(a)(13)	4.11	N		Language pulled from existing Section 2.2 and moved to new section to provide clarity
Compliance date report	3.2	4.12	N		
Periodic compliance reports	3.3	4.13	N	Yes	
Monitoring and reporting requirements	3.4	4.14	N	Yes	
Chapter 5. Special Discharge Agreements					
Application requirements	New	5.1	Y		Better document the implementation of the Special Discharge Agreement program
Special discharge agreement conditions	New	5.2	Y		
Monitoring and reporting requirements	New	5.3	Y		
Chapter 6. Wastewater Hauler Program					
Wastewater hauler criteria	4.1	6.1	N	*	<i>*Optional provisions in the Model Pretreatment SUO. Proposed language clarifying existing requirements.</i>
Wastewater hauler permit required.	4.2	6.2	N		
Wastewater hauler tank vehicle requirements	4.2	6.3	N		Split current 4.2 into two paragraphs to make the Permit and Registration clearer
Insurance required	4.3	6.4	N		
Sampling and analysis requirements prior to discharge	4.5	6.5	N		
Discharge procedures	4.4	6.6	N		
Administrative procedures	4.6	6.7	N		
Chapter 7. Regulation of Fats, Oils, and Grease to the Sewer System					
Grease interceptors	1.4(h)	7.1	N		

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Chapter 8. Noncompliance and Enforcement					
Enforcement	1.17	8.1	N	Yes	
Notification of violation	1.16	8.2	N		
Response to notification of violation	1.18	8.3	N		
Penalties	NEW	8.4	Y		
Compliance Agreement	1.19	8.5	N	Yes	
Show-cause hearing	1.20	8.6	N		
Publication of significant noncompliance	3.9	8.7	N	Yes	
Chapter 9. Effective date; formalities					
Effective date	5.1	9.1	N		