



MISSION STATEMENT

The mission of the Industrial Waste Unit (IWU) is to protect the City's freshwater resources and wastewater treatment plants by enforcing local, state and federal regulations governing wastewater discharges to the City's wastewater and stormwater collection systems.

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What's Inside?

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SEMI-ANNUAL COMPLIANCE REPORT REMINDERS

1. Make a checklist to ensure all paperwork is included to avoid incomplete reports.
2. Complete all reports at least 10 days before due date to allow for mailing time.
3. Make sure you mail your report to the correct Permit Administrator. The mailing address for your Semi-Annual Compliance Report is:

Baxter Water Treatment Plant
9000 State Road
Philadelphia, PA 19136

DEADLINE REMINDER

Semi-Annual Compliance Reports are Due NO LATER THAN January 31, 2017.

Submitting your Semi-Annual Compliance Report more than 30-days late is considered Significant Non-Compliance.



Compliance Assistance: Hazardous Waste Reporting Requirements

EPA's Clean Water Act (CWA) Pretreatment Program regulations require that Industrial Users (IUs) report any substance discharged to the Publicly Owned Treatment Works (POTW) which, if otherwise disposed of, would be considered a Resource Conservation and Recovery Act (RCRA) hazardous waste. Under RCRA's Domestic Sewage Exclusion (DSE), any mixture of domestic sewage and other wastes that pass through a sewer system to a POTW is not considered a hazardous waste for the purposes of RCRA. For this reason, reporting of these discharges are regulated under the CWA as follows:

- **40 CFR 403.12(p)** requires a one-time report for each substance discharged to a POTW that, if otherwise disposed of, would be considered RCRA hazardous waste.
- **40 CFR 403.12(j)** requires a report in advance of any substantial change in volume or character of any IU discharge.

Who Must Notify:

All IUs that discharge a substance that, if otherwise disposed of, would be characteristic or listed wastes under 40 CFR Part 261 and meet the following criteria:

- Total waste discharged is greater than or equal to 15 kg/month; or
- Waste discharged is acute hazardous waste.

Notification Must be Sent To:

1. Local Sewerage Authority (i.e., POTW)
2. EPA Regional Waste Management Director
3. State Hazardous Waste Authority

What is a "Hazardous Waste" under RCRA?

A solid waste (as defined in 40 CFR 261.2) is a hazardous waste if it is not excluded from the regulations in 40 CFR 261.4 and if it exhibits any of the characteristics of a hazardous waste in 40 CFR part 261 subpart C or if it is listed in 40 CFR part 261 subpart D.

- **Characteristic hazardous wastes:** Wastes are classified as characteristic hazardous waste when they exhibit one or more of the hazardous characteristics identified in 40 CFR part 261 subpart C (40 CFR 261.20-261.24) i.e., they are ignitable, corrosive, reactive, or toxic. Note that many of these characteristic hazardous wastes are prohibited from discharge to POTWs in accordance with the specific prohibitions in 40 CFR 403.5(b). Mixtures of characteristic wastes and non-hazardous wastes are hazardous wastes only if the mixture exhibits a characteristic of a hazardous waste (40 CFR 61.3(b)(3)) i.e., when mixed, it is still ignitable, corrosive, reactive or toxic. However, note that dilution is prohibited as a substitute for treatment in both 40 CFR 403.6(d) and 40 CFR 268.3.
- **Listed hazardous wastes:** Wastes are classified as listed hazardous if they have been specifically identified and listed by EPA as hazardous waste. There are three types of listed hazardous waste: hazardous wastes from non-specific sources (F-listed), hazardous waste from specific sources (K-listed), and discarded commercial chemical products, off-specification species, container residues and spill residues (P- or U-listed). Some listed hazardous wastes are considered acute hazardous waste, namely 6 of the F-listed hazardous wastes (F020-F023, F026, F027) and the entire P-list. If any listed wastes are mixed with non-hazardous waste, the entire wastestream is considered listed hazardous (40 CFR 261.3(a)(2)(iv)) and a notification must be submitted.

Compliance Assistance: Hazardous Waste Reporting Requirements (Cont.)

Waste Covered by the Notification:

- Any discharge to the POTW of greater than or equal to 15 kg per calendar month of a RCRA non-acute hazardous waste.
- A discharge of any quantity of an acute hazardous waste, namely:
 - F020-F023, F026, and F027 under 40 CFR 261.31; and
 - Any P-listed hazardous waste listed under 40 CFR 261.33(e).

NOTE: Pollutants already reported under IU self-monitoring requirements are not subject to this notification requirement.

Notification Must Contain:

For hazardous wastes of greater than or equal to 15 kg/month or any quantity of acute, the one-time notification from an IU to a POTW must contain:

1. Name of the hazardous waste as set forth in 40 CFR Part 261.
2. EPA hazardous waste number (code).
3. Type of discharge to the sewer (continuous, batch, or other).
4. A certification that the IU has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.

If the IU discharges greater than 100 kg of acute or non-acute hazardous waste per calendar month to the POTW, the notification must also contain the following items of information, to the extent such information is known and available:

5. An identification of the hazardous constituents contained in the hazardous wastes.
6. An estimation of the mass and concentration of such constituents in the waste stream discharged during the calendar month in which the one-time report is made.
7. An estimation of the mass of constituents in the wastestream expected to be discharged during the 12 months following the notification.

When the Notification Must be Submitted:

- Notifications for existing dischargers, i.e., those in existence prior to August 23, 1990, were required to be submitted no later than February 23, 1991.
- IUs who commence discharging after August 23, 1990 must submit the notification no later than 180 days after the discharge of a hazardous waste.
- In the case of newly identified hazardous wastes, the IU must submit a notification within 90 days of the effective date of such regulations.
- The notification only needs to be submitted once for each hazardous waste discharged, except when there will be a substantial change in the volume or character of the hazardous waste discharged
- In the case of a substantial change in volume or character (a long-term, not an episodic change, generally because of a planned change to the facility or operations), another one-time report is required.
- The POTW may require additional reporting of these substances as it deems necessary.

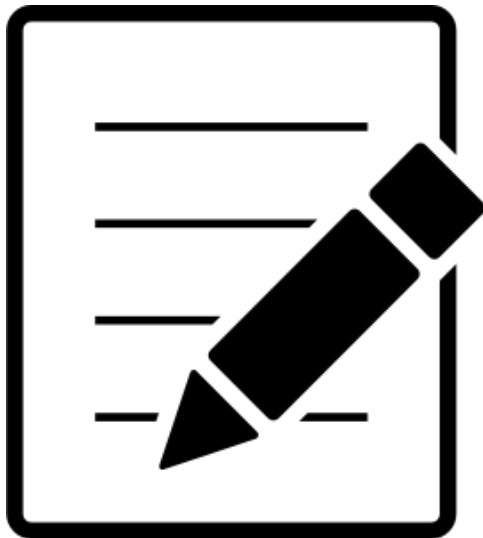
Compliance Assistance: Signatory Requirements

All applications, reports and information submitted to the IWU by a permitted Significant Industrial User (SIU) must be signed by an authorized representative of the Industrial User.

Signatory requirements can be found in Part VI, Section 4 of your facility's Wastewater Discharge Permit.

Who is authorized to sign documents submitted to PWD?

In general, an authorized representative is anyone who has the authority to make management decisions that govern the construction and operation of the regulated facility. The position occupied by an authorized representative can vary depending on the business structure. Your permit specifically identifies an authorized representative's title for corporations, sole proprietorships, or partnerships. Consult Part VI, Section 4 (a) & (b) of your permit for specific definitions of who qualifies for this designation.



What is a "Duly Authorized Representative"?

If a company's authorized representative (as defined in Part VI, Section 4 (a) & (b)) would like to confer signatory authority to another employee, they may designate a duly authorized representative for signing reports. The SIU must meet specific requirements (see Part VI, Section 4 (c)) for designating a duly authorized representative. In addition to specific qualifications for who can be a duly authorized representative, the SIU must submit written authorization for this designation to the IWU.

What happens when there is a change at the facility?

If a duly authorized representative no longer meets the signatory requirements, a new authorization must be submitted to the City prior to or together with any reports to be signed by an authorized representative. To help permittees achieve compliance with the designation of a duly authorized representative the IWU has developed a form that may be used for designation of a duly authorized representative. The "Signatory Designation Form" can be found on the IWU's webpage (www.phila.gov/water/IWU.html) under the "Industrial Waste Resources" section in the "Permit Reporting Forms" tab.



26th ANNUAL INDUSTRIAL PRETREATMENT CONFERENCE

APRIL 21 & 22, 2016
THE INN AT READING
READING, PA



<http://www.epwpcoa.org>

Pretreatment Puzzle: Metal Finishing Word Scramble

NUMLAMUI	<input style="width: 100%;" type="text"/>	21
ZIINOGNAD	<input style="width: 100%;" type="text"/>	
NEISARC	<input style="width: 100%;" type="text"/>	15
RAGNIZB	<input style="width: 100%;" type="text"/>	
CIUMAMD	<input style="width: 100%;" type="text"/>	3
MHROCE TAGNOCI	<input style="width: 100%;" type="text"/>	20
CONLGORI	<input style="width: 100%;" type="text"/>	
PCROPE	<input style="width: 100%;" type="text"/>	22 14
DIECANY	<input style="width: 100%;" type="text"/>	13
CRSESELOLT GPNALTI	<input style="width: 100%;" type="text"/>	2
LCNIATRINPOEEGT	<input style="width: 100%;" type="text"/>	5
ROECAEGLNILTTP	<input style="width: 100%;" type="text"/>	1
NCTIEGH	<input style="width: 100%;" type="text"/>	10
NIDGIGRN	<input style="width: 100%;" type="text"/>	4
HETTEARAGNIT	<input style="width: 100%;" type="text"/>	9
NIGNACIMH	<input style="width: 100%;" type="text"/>	18
MILIGLN	<input style="width: 100%;" type="text"/>	8
PIHNAHSOGPT	<input style="width: 100%;" type="text"/>	11
PISGOHLIN	<input style="width: 100%;" type="text"/>	25 23
NINGUIHQCE	<input style="width: 100%;" type="text"/>	16 7
BASNILNTADSG	<input style="width: 100%;" type="text"/>	24
NARGESHI	<input style="width: 100%;" type="text"/>	6
RISTENGIN	<input style="width: 100%;" type="text"/>	12
LTMIBGUN	<input style="width: 100%;" type="text"/>	17
TOONICNIZRAIZ	<input style="width: 100%;" type="text"/>	19

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1 2 3	4 5 6 7 8 9 10 11 12 13	14 15 16 17 18 19 20 21 22 23 24 25

Industrial Waste Unit Contact Information

Questions, comments and suggestions for future topics are always welcome and suggested.

For comments on draft permits contact us at:

Industrial Waste Unit
1101 Market Street, 3rd Floor
Philadelphia, PA 19107

Phone 215-685-6236
Fax 215-685-6232



For questions about your permit:

Baxter Water Treatment Plant
9001 State Road
Philadelphia, PA 19136
Kim Veres 215-685-8096
Lonnie Goldiner 215-685-8034
Walter Milton 215-685-8095
Fax 215-685-8008

Visit the Industrial Waste Unit Online at: www.phila.gov/water/IWU.html