



# The Pretreatment Times

## MISSION STATEMENT

The mission of the Industrial Waste & Backflow Compliance (IWBC) Unit 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 system.

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## REMINDER

### SEMI-ANNUAL COMPLIANCE REPORT DUE JANUARY 31, 2023

- Ensure all paperwork is included to avoid incomplete reports
- Complete all reports at least 10 days before due date to allow for mailing time
- Make sure you mail your report to the correct Permit Administrator (PA).
- The mailing address for your Semi-Annual Compliance Report is:

Baxter Water Treatment Plant  
9001 State Road  
Philadelphia, PA 19136

Get a reporting form at [phillyh2o.info/sa-report](http://phillyh2o.info/sa-report)

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## REPORTING & RELATED VIOLATIONS

The Industrial User (IU) is subject to numerous reporting and notification requirements. Knowing your reporting requirements and due dates helps avoid violations and potential fines.

### *Know your Reporting Requirements to Avoid Violations and Potential Fines*

## REQUIRED REPORTS & NOTIFICATIONS

Reports that need to be submitted promptly, as listed in the Philadelphia Water Department Regulations (PWDR) Reporting Requirements section 502.4 & Civil Penalty Assessment Policy section 501.9, include but are not limited to the following:

- ⇒ Any report required by law or permit
- ⇒ Application for Wastewater Discharge Permit or late application
- ⇒ Baseline Monitoring Reports (BMR)
- ⇒ Periodic Compliance Reports
- ⇒ Semi-Annual Compliance Report
- ⇒ Spill Plans
- ⇒ Surcharge Reports
- ⇒ Responses to Notices of Violations (NOV) or Responses to Notices of Significant Non-Compliance (SNC)
- ⇒ Reports required under any Compliance Schedule, Administrative Order, or Consent Decree
- ⇒ Notification of spill or slug discharge; follow-up written report within five (5) days of spill or slug event
- ⇒ Reporting sampling non-compliance within twenty-four (24) hours of becoming aware of the violation; reporting first sample result showing a return to compliance
- ⇒ Hazardous Waste Notification
- ⇒ Pretreatment Facilities Reports

***Late reporting may result in a minimum fine of \$300 and could go up to \$25,000 per violation per day.***

***See PWDR Section 501.9 (f) for details: <https://water.phila.gov/pool/files/pwd-regulations-chapter-5.pdf>***

## TIPS TO AVOID VIOLATION

- **Refer to the Standard Conditions and EPA guidelines** to avoid Significant Non-Compliance Letters and Notices of Violations.
- **Refer to Resource Conservation and Recovery Act (RCRA)** for how to dispose of hazardous waste.

### ⇒ **If sampling indicates a violation:**

- \* Notify PWD within 24 hours of becoming aware
- \* Resample
- \* Submit a written report of the violation within 5 days
- \* Submit the results of the resample within 30 days

### ⇒ **Notify PWD of any discharges that could cause problems at the POTW:**

- \* Spill or slug discharges
- \* Any waste that could be considered hazardous
- \* Within one hour of becoming aware, call the City Municipal Dispatcher (215-686-4514)
- \* Submit a written report that details the issue and what steps will be made to prevent a recurrence within 5 days of the issue
- \* Within 3 months of the effective permit date, an Accidental Spill Prevention Plan/ Slug Control Plan must be submitted

### ⇒ **Failure to comply with PWD regulations may result in administrative action or enforcement:**

- \* Within 15 days of a violation notice, an explanation must be submitted that details the issue and all actions that will be taken
- \* Within 30 days of a violation notice, submit a proposed plan to achieve compliance unless the 15-day response states that the matter is resolved

***Communicate any reporting issues with your Permit Administrator (PA) immediately to work on it to avoid potential violation(s) and fines.***

## CHANGES TO FACILITY?

Changes and events are expected to occur to the facility, such as the facility's name, ownership, contact person, authorized representative(s) (signatory) change or addition, process, treatment, and mailing address changes. Wastewater Discharge Permit must reflect accurate information and activities performed at the facility, and to ensure accuracy consistently report any changes to PWD – IWBC.

***Report any changes at your facility to PWD-IWBC***

## GUIDELINES TO REPORT NAME AND/OR OWNERSHIP CHANGES

### *Name and/or Ownership Change Notification Form*

Industrial Users wishing to transfer a Permit due to a company name or ownership change shall submit a *Name or Ownership Change Notification Form* to the City, for approval, at least thirty (30) days in advance of any change.

The form must be sent to the Industrial Waste & Backflow Compliance at the following address:

Attn.: Jennifer L. Moore, Chief Engineer  
PWD – Industrial Waste & Backflow Compliance  
1101 Market St., 6<sup>th</sup> Floor  
Philadelphia, PA 19107

**Get the form here: [phillyh2o.info/iw-changeform](http://phillyh2o.info/iw-changeform)**

## ATTENTION!

**PWD – IWBC sends and accepts documents to/from an authorized person with a signatory form on file. For any person who would represent the facility at any time, a signatory form must be submitted to PWD – IWBC office. Next are guidelines to fill out and submit a signatory form.**

## INSTRUCTIONS TO FILL OUT THE SIGNATORY FORM

### *Signatory form*

This form is for Industrial Users wishing to establish an authorized representative responsible for reviewing and signing reports required by the Industrial User's Wastewater Discharge Permit. It must be certified and signed by an authorized representative and the designated signatory.

### *How to fill out signatory form*

- ⇒ In Section 1) Company Information,  
Provide all requested information about the facility.
- ⇒ In Section 2) Signatory Information,  
Provide all requested information about the facility representative being designated. ⇒
- In Section 3) Certification Statement,
  - \* The "Representative Conferring Signatory Authority" field must be filled out by the new representative being designated.
  - \* The "Authorized representative" field must be filled out by an existing authorized representative

The form must be sent to your Permit Administrator at the following address:

Baxter Water Treatment Plant  
9001 State Road  
Philadelphia, PA 19136

**Get the form here: [phillyh2o.info/iw-signatory-declaration](http://phillyh2o.info/iw-signatory-declaration)**

## SEMI-ANNUAL COMPLIANCE REPORTS

Reports are Due every January 31 & July 31 and shall include:

- ⇒ Sampling results,
- ⇒ Average and maximum daily wastewater flow volume,
- ⇒ Compliance statement, and
- ⇒ Certification statement signed by an authorized representative.

### ***Incomplete Reporting***

**Reports and notifications that are timely submitted but contain errors or omissions, is a violation of PWD Regulations and could correspond to a fine up to \$5,000.**

***PWD Regulation Section 501.9 (f) Note Number 1 (5): <https://water.phila.gov/pool/files/pwd-regulations-chapter-5.pdf>***

Certification

I P I F S C A E S V R V E C G

Effluent

N R O U P G F R T L I K G O N

Monitoring

S W F L I F U C C O U U R M I

Pretreatment

J T F D L T N I L C B G A P R

Signatory

H G I U L U D A C J R J H L O

Violation

L K E M Q O T V F L F D C I T

Compliance

A N I I I I K A P O V O S A I

Flow

Periodic

T I U R O L T C N W S S I N N

Sampling

W B E N E Z V L K T K C D C O

Slug

Discharge

M P X Z E S A M P L I N G E M

Limits

N M W O L F Y R O T A N G I S

Pollutant

C E R T I F I C A T I O N K W

Semiannual

T N E M T A E R T E R P X B S

Spill

S E M I A N N U A L D B C O E

K K K O T F M S B B E N Y M D

## Industrial Waste and Backflow Compliance Unit Contacts

For comments regarding changes in or affecting Permit:

Industrial Waste & Backflow Compliance Unit  
1101 Market Street, 6th Floor  
Philadelphia, PA 19107

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

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

For general questions on Permit, contact Permit Administrator:

Baxter Water Treatment Plant  
9001 State Road  
Philadelphia, PA 19136

John Hickey 215-683-2231  
Carrie Keeley 215-685-8007  
Tridung Tran 215-683-9024  
Fax 215-685-8008



Visit the Industrial Waste Unit Online at:

<https://water.phila.gov/industrial-waste/>