



Welcome to the first issue of *The Pretreatment Times*. *The Pretreatment Times* is a semi-annual publication that provides useful information such as regulation updates, reminders for upcoming events, and permit compliance assistance information to all permitted Significant Industrial Users (SIUs) in PWD's service area.

In this issue we will discuss some often overlooked permit requirements and provide some quick tips on how to stay in compliance...or what you are really concerned about, how to stay out of Significant Non-Compliance!

Now you may have never been in Significant Non-Compliance (which is a very good thing), but are you aware how quickly that can change? Well then try answering these questions:

Volume 1
 Winter 2009

Inside This Issue

Compliance Assistance	2
Notification Requirements	3

PERMIT COMPLIANCE ASSISTANCE

- ***Do you know that you are required to notify PWD within 24 hours of becoming aware of an effluent limit violation?***
- ***Do you know that you are required to resample to confirm return to compliance when you violate an effluent limit or if you miss a sample?***
- ***Do you know who to contact when becoming aware of an effluent limit violation?***
- ***Do you have problems meeting your monthly average limits?***

If you have experienced problems relating to any of the above questions, LOOK INSIDE for more information.



REMINDERS:

**Semi-Annual Compliance Reports are Due:
 January 1-January 31, 2010**

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

If your report has not been received you will find yourself in Significant Non-Compliance!!

COMPLIANCE ASSISTANCE



What Does SNC Mean to You??

Users who find themselves in Significant Non-Compliance (SNC) are subject to enforceable compliance schedules, increased sampling, mandatory fines and permit revocation. In addition to paying fines, users in SNC are publicly noticed in *The Philadelphia Inquirer*. Below we detail each Industrial Users (IUs) notification requirements present in every Wastewater Discharge Permit, as well as their due dates, or the timeframe in which reports are expected to be submitted.

Notification Requirements

The pretreatment program requires that all Industrial Users (IUs) submit required reports to their permit administrators (PAs) within 30-days of the specified due date or they will find themselves in SNC. Many IU notification requirements are detailed in the Wastewater Discharge Permit's Standard Conditions (Parts IV, V, and VI).

Violation of Pretreatment Standards—Part IV, D

Do you know you know that you are required to resample to confirm compliance if you miss a sample or violate an effluent limit? Resample as soon as possible. Are you aware that you are required to notify your PA of an effluent limit violation within 24 hours of receiving your analytical data? Notification requirements for IUs whose samples indicated a violation of effluent limits are detailed below:

1. If sampling indicates that an IU has violated a permit limit, the IU must **notify their PA within 24 hours** of becoming aware of the violation. (Failure to read results from the laboratory does not exempt you from this notification requirement and associated penalties)
2. **RESAMPLE**—IUs in violation of permit parameters are required to **re-sample for that parameter to verify a return to compliance**. IUs are required to submit the results of resampling to their PA within 30 days of becoming aware of the violation. Compliance with this requirement will result in the IU taking one *additional sample*. Your next scheduled sampling event is not considered your "resample" as identified in this requirement.
3. IUs are required to **submit a report within 5 days** of becoming aware of a violation. The 5-day report requires the following information (as detailed in "Accidental and Unpermitted Discharges" (Part IV, B)):
 - A description of the cause of the upset, accidental or slug discharge, bypass, and the impact on Industrial User's compliance status. The description shall also include location of the upset or discharge and type, concentration and volume of waste.
 - The duration of noncompliance, including exact dates and times of noncompliance, and, if the noncompliance continues, the time by which compliance is reasonably expected to occur.
 - All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, accidental or slug discharge, bypass, or other conditions of noncompliance.



COMPLIANCE ASSISTANCE

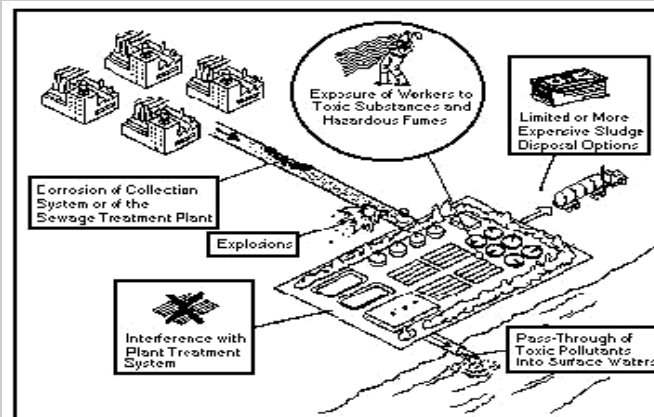
Know Your Permit Administrator

You should know who your permit administrator is and have their phone number accessible if you have any questions or concerns:

- Joe Cerrone 215-685-8030
- Bob Gonsiewski 215-685-8093
- Evan Schofield 215-685-8068

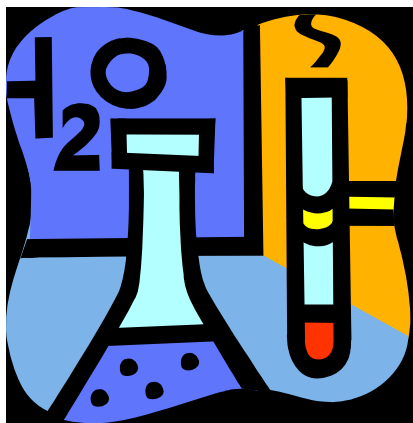
The first step in achieving compliance is understanding your permit. Read the whole permit and make sure that you understand what is required of your facility.

If there is something in the permit you don't understand or have questions about *call your Permit Administrator (PA)*. IWU's permit administrators and their staff have years of experience helping IUs achieve and maintain compliance with their permit requirements. They are your best resource for answering questions about your permit requirements or compliance issues.



Pretreatment is intended to prevent the introduction of pollutants into the Publically Owned Treatment Works (POTWs) that will cause interference with its operation, that will pass through the POTW into waters of the State, to provide protection for both public health and welfare and POTW workers and to promote beneficial reuse and recycling of domestic wastewater and residuals from POTWs.

Meeting Monthly Average Effluent Limits



What is a "Monthly Average Effluent Limit"?

Monthly average effluent limits restrict the average daily pollutant concentration (or mass) in a facility's wastewater during a calendar month.

How does an IU calculate their monthly average pollutant level?

Monthly average pollutant concentration is an arithmetic average of all known *daily* pollutant concentrations during a calendar month. Where multiple samples have been analyzed during a particular day, the daily pollutant concentration is an arithmetic average of each sample result for that day.

How can you increase the likelihood of complying with an average monthly effluent limit?

IUs can help protect themselves from monthly average effluent limit violations by **taking samples early in the month**. Because compliance with the monthly average effluent limit depends upon an average, one sample result in excess of this limit does not necessarily determine noncompliance. By taking samples early in the month, if it is found that the first sample violates a monthly average limit, the IU may have time to **take another sample** and help lower their monthly average to bring the IU into compliance.

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
 9000 State Road
 Philadelphia, PA 19136
 Joe Cerrone 215-685-8030
 Bob Gonsiewski 215-685-8093
 Evan Schofield 215-685-8068