



## MISSION STATEMENT

The mission of the Industrial Waste and Backflow Compliance (IWBC) 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.

**JULY 2022  
VOLUME 25**

### Inside This Issue:

## What's Inside?

- ◆ The Compliance Assistance section covers significant non-compliance violation and tips to avoid receiving one. Hazardous waste notification requirements is also covered under the Compliance Assistance section.
- ◆ This issue concludes with a challenging Pretreatment Times Word Search Puzzle for your enjoyment.

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## SEMI-ANNUAL COMPLIANCE REPORT REMINDERS



1. 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  
9001 State Road  
Philadelphia, PA 19136

<https://water.phila.gov/pool/files/industrial-waste-semiannual-compliance-report.pdf>

## DEADLINE REMINDER

**Semi-Annual Compliance Reports are Due NO LATER THAN July 31, 2022.**

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

## Compliance Assistance

### Significant Non-Compliance (SNC)

Users in Significant Non-Compliance are subject to enforceable compliance schedules, increased sampling, mandatory fines (up to \$25,000) and permit revocation.

#### What is an SNC?

An Industrial User (IU) is in SNC when they do not meet one or more Pretreatment Standards or Requirements (Discharge, Effluent, Reporting, Monitoring, Compliance plan) **including, but not limited to:**

#### REPORTING

**Failure to provide any required reports within thirty (30) days after report's due date:**

- ◆ Periodic Compliance Reports
- ◆ Spill Prevention and Slug Control Plans
- ◆ Semi-Annual Compliance Reports
- ◆ Responses to Notices of Violations
- ◆ Baseline Monitoring Reports

**Failure to accurately report non-compliance:**

- ◆ Incomplete Reporting - Reports and notifications are timely but contain errors or omissions
- ◆ Intentional Falsification - The IU has intentionally falsified reports or documents

#### SAMPLING & MONITORING

**Sampling violations:**

- ◆ Failure to sample for any required parameters
- ◆ Failure to follow proper sampling protocols
- ◆ Failure to sample at approved location
- ◆ Failure to sample as per frequency in the Wastewater Discharge Permit

**Monitoring violations:**

- ◆ Monitoring for any parameter less than 100% of the total sampling events required by the Permit
- ◆ 33% or more of all samples taken for any single parameter during a six month period demonstrate exceedances of any numeric Pretreatment Standard or Requirement

#### Tips to avoid SNC:

- ◆ Submit complete and accurate report before due date. Double check reports before submission.
- ◆ Respond to all violation letters addressing cause of violation, steps were taken in response to the violation, future plans to avoid the violation.
- ◆ Do not put false information in any reports.
- ◆ Consider continuous monitoring.
- ◆ Take more samples than required in the permit.
- ◆ Resample when any parameter is out of compliance and show return to compliance.
- ◆ Read all lab reports thoroughly and promptly.

## Hazardous Waste Notification

The Industrial User shall notify the City, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge to the City of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261 (RCRA).

### Written notification must include:

- ◆ The name of the hazardous waste as set forth in 40 CFR Part 261.
- ◆ The EPA hazardous waste number.
- ◆ Type of discharge (continuous, batch, or other).
- ◆ The Industrial User shall certify that it 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 discharge is more than 100 kilograms of hazardous waste per calendar month:

Then, must include:

- ◆ An identification of the hazardous constituents contained in the discharged wastes.
- ◆ An estimation of the mass and concentration of such constituents in the wastestream discharged during the calendar month.
- ◆ An estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve (12) months.

### If discharge less than 15 kilograms of hazardous waste per calendar month:

If allowed under the Industrial User's Permit, then the above notification is not required; unless the wastes are RCRA acute hazardous wastes, which require a one-time notification.

### New listing of hazardous waste:

In case of new regulations that identify additional substance(s) as hazardous waste, the written notification of the discharge of these substance(s) must be submitted within ninety (90) days of the effective date of such regulations.

### Hazardous Waste Puzzle:

D	C	Y	H	E	M	N	X	N	R	N	I	F	W	X
X	I	X	T	Q	U	I	H	O	W	G	X	E	P	B
H	N	S	W	I	Z	Z	V	T	N	D	C	W	W	O
L	T	J	P	R	V	R	X	I	C	N	P	A	N	E
H	X	N	N	O	R	I	T	F	A	V	E	S	Y	P
R	A	K	A	E	S	A	T	I	B	Z	R	T	T	E
N	V	Z	W	T	B	A	L	C	M	H	M	E	I	G
C	A	E	A	I	U	P	L	A	A	U	I	W	C	R
Y	S	E	L	R	M	L	U	T	D	E	T	A	I	A
A	V	I	U	O	D	J	L	I	B	K	R	T	X	H
I	T	L	C	S	N	O	D	O	B	Q	H	E	O	C
Y	S	A	M	P	L	E	U	N	P	P	M	R	T	S
I	S	U	Y	T	I	V	I	S	O	R	R	O	C	I
T	R	E	A	T	M	E	N	T	U	Q	M	A	T	D
G	N	I	L	C	Y	C	E	R	L	S	T	M	W	K

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|--------------|-------------|--------------|------------|
| Compliance   | Corrosivity | Discharge    | Sewer      |
| Disposal     | Hazardous   | Ignitability | Toxicity   |
| Notification | Permit      | Pollutant    | Treatment  |
| Reactivity   | Recycling   | Sample       | Wastewater |

<https://puzzlemaker.discoveryeducation.com/>

## Industrial Waste & Backflow Compliance Unit Contact Information

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

<p>For comments on draft permits contact us at:</p> <p>Industrial Waste &amp; Backflow Compliance Unit 1101 Market Street, 6th Floor Philadelphia, PA 19107</p> <p>Phone            215-685-6236 Fax                215-685-6232</p>	<p>For questions about your permit:</p> <p>Baxter Water Treatment Plant 9001 State Road Philadelphia, PA 19136</p> <p>Kim Veres            215-685-8096 Carrie Keeley        215-685-8007 John Hickey         215-683-2231 Fax                    215-685-8008</p>
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Visit the Industrial Waste Unit Online at: <http://www.phila.gov/water/iwu.html>