

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.

**July 2023
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REMINDER



**SEMI-ANNUAL COMPLIANCE REPORT
DUE JULY 31**

- Ensure all paperwork is included to avoid incomplete reports.
- Complete all reports at least 10 days before due date to allow for mailing time. Reports **MUST BE RECEIVED** by PWD by the due date.
- 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

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



COMPLIANCE ASSISTANCE _ PERMIT REQUIREMENTS AND STANDARD CONDITIONS



All permits issued by Philadelphia Water Department—Industrial Waste & Backflow Compliance (PWD-IWBC) establish specific discharge, monitoring, and reporting requirements. Failure to obtain a required Permit or violation of Permit conditions may be punishable by monetary fines. This section highlights some of the Permit's requirements. Please refer to your Permit & PWD Regulations for all requirements in detail to avoid violations and stay in compliance.

Spill Prevention/ Slug Control Plan

Due within three (3) months of Permit effective date.

Wastewater Discharge Permit Renewal

- ◆ The renewal application is due 180 days before the Permit expiration date.
- ◆ Permit renewal fee shall be in the amount listed in Section 7.3 of the Philadelphia Water Department Rates & Charges at the time of renewal.

Requirements to return to compliance after failure

- ◆ Submission of the report explaining the reason for failure and actions that will be or have been taken to return to compliance.
- ◆ If the matter is still outstanding, submission of a proposed plan to achieve compliance is required within 30 days.

Permit transfer requirements

- ◆ City's written approval.
- ◆ No change in the facility's operation or process.

Requirements for City approval for Permit transfer

- ◆ Written notice of intent to transfer Permit at least 30 days in advance.
- ◆ Notice shall include a written certification by the new owner or operator stating:
 - ⇒ The new owner/ or operator has no intent to change the facility's operation or processes.
 - ⇒ Specific date on which the transfer is to occur.
 - ⇒ Acknowledges full responsibility for correcting all preexisting violations including, but not limited to, implementing corrective action plans & paying fines.

PERMIT REQUIREMENTS _ REPORTING

Sampling indicates violation

- ◆ Notify City within 24 hours.
- ◆ Written report within (5) days of initial notification.
- ◆ Resampling within (30) days.
- ◆ Resampling until returns to compliance.

Production Rate Change

(More than 20 % change)

Semi-annual Compliance Report

Due end of January & July unless required differently by the City.

Spill/ slug discharge notification

- ◆ Call the municipal dispatcher within 1 hour.
- ◆ Written report to the City within five (5) working days.

SAMPLING REQUIREMENTS

- For pretreatment facilities, sampling should be taken immediately downstream from the regulated process if no pretreatment exists.
- Samples shall represent the normal discharges occurring during the reporting period.
- Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. All other pollutants must be sampled with 24-hour composite samples through flow proportional sampling techniques.
- For sampling required in support of BMR and 90-day compliance reports, a minimum of 4 grab samples must be used.
- Sampling shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, including but not limited to sample preservation, sampling vessels, and equipment.
- Analysis shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, including but not limited to analytical methods and sample holding time.

SAMPLING VIOLATIONS & TIPS TO AVOID THEM

Examples of Sampling Violations

- ◆ Not sampling for one or all required parameter(s).
- ◆ Not following proper sampling protocols.
- ◆ Not sampling at the appropriate sampling point.
- ◆ Not sampling as often as required by Permit.

Avoid Sampling Violations

- ◆ Ensure that sampling occurs during all months where discharge is reported.
- ◆ Sample early in the month (or sampling period) to allow time for resampling if needed.
- ◆ Ensure that correct sampling method is used for appropriate parameters.
- ◆ Ensure that chain of custody is included with all necessary information.
- ◆ Review Permit provisions and familiarize yourself with your facility's monitoring & reporting requirements.
- ◆ Refer to the following sections of your Permit:
 - Part III "Monitoring Requirements" for sampling frequency.
 - Part I "Effluent Limits" for discharge limits assigned to the pollutants regulated.
 - Exhibit A for correct sampling location.
- ◆ Always use PA accredited lab to analyze your samples.
- ◆ Always sample from the sampling point specified in your Permit.



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COMPLIANCE QUIZ

What reporting violation could result in IU being in SNC?

- Incomplete reporting
- Intentional falsification of data
- Over thirty (30) days late reporting
- All of the above

The Spill Prevention/ Slug Control Plan should include procedures for notifying the City of discharge.

- True
- False

What actions should be followed when sampling indicates violations?

When sampling indicates violations, for how long should IU conduct?

What monitoring violations could result in IU being in SNC?

COMPLIANCE QUIZ

What shall be contained in the Semi-annual Compliance Report?

For facilities for which historical sampling data do not exist, a minimum of four (4) grab samples must be used for parameters with grab sampling requirements.

Yes
 No

Who could be an authorized representative for a facility?

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 215-685-8002
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/>