PHILADELPHIA WATER DEPARTMENT

The Pretreatment Times

July 2025 - Volume 31

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.

Inside This Issue

Reminders

Semi-annual Compliance Report

- Due July 31, 2025

- 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

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

Compliance Assistance:

pH of Effluent Wastewater

According to Philadelphia Water Department regulations section 501.3 (b)(3), "any wastewater having a pH less than 5.5 or higher than 12.0 as measured by a grab sample or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW…" the discharge of such wastewater would be a violation, and can result in fines being incurred, along with additional enforcement actions.

There are many ways to prevent pH violations. The simplest, and most proactive, is to influence the pH by adding either an acid or a base into your wastewater before it is discharged into the sewer. This can prevent your wastewater from being outside of the required pH range before reaching the POTW and causing a violation.

pH fluctuation is a common problem in certain industries and can lead to problems in the treatment of the discharged wastewater. It is important that the facility take all necessary steps to remain in compliance with the rules around wastewater pH so as not to violate any of the regulations on their permit.

Depending on the type of facility, and/or the type of wastewater producing processes the pH can fluctuate. Without monitoring your pH, you may unknowingly be discharging wastewater that does not comply with the required pH levels.

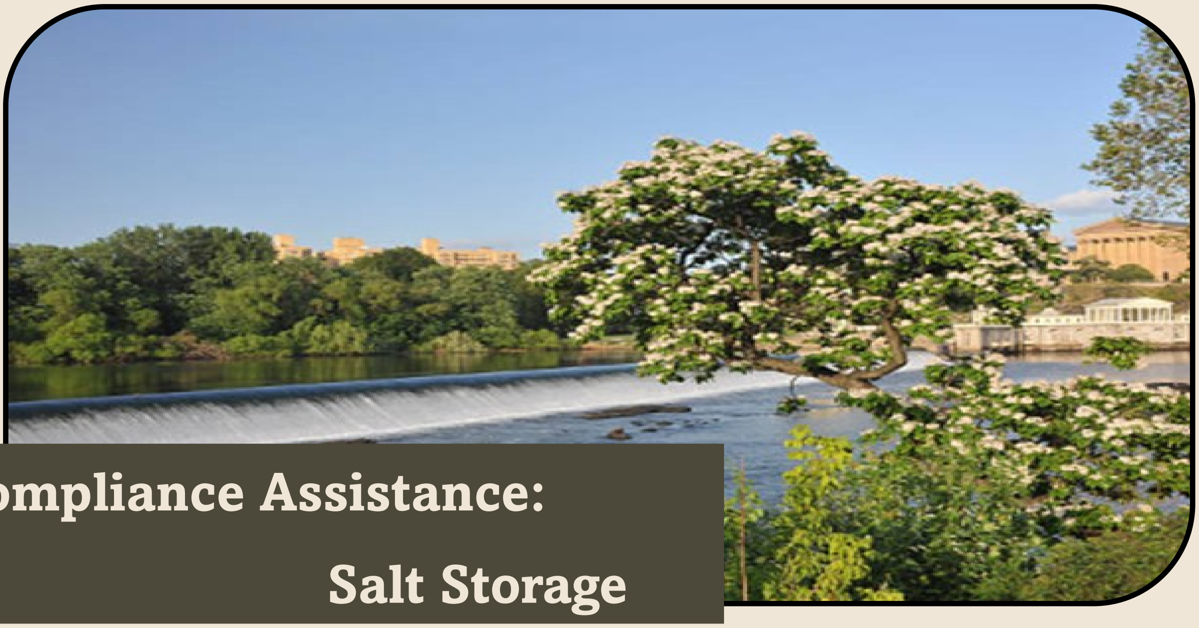
https://water.phila.gov/wp-content/uploads/files/industrial-wastes-pretreatment-guidelines.pdf

"All industries with liquid waste effluents below a pH of less than 6 or more than 9 standard units must have some type of pre-treatment interception of their waste before it enters the city sewer system."

As with any instance of non-compliance, enforcement actions may be taken, possibly including fines.

pH is a topic of concern for several reasons:

- Sewer Blockage— Wastewater with a pH of less than 5 can obstruct wastewater pipes, both City pipes, and those at your facility.
- Hauled Waste—When concentrated hauled waste is discharged into a treatment work with an out of regulation pH the change can cause problems in the treatment processes.
- Biochemical Oxygen Demand—The increased biochemical oxygen demand (BOD) can overwhelm biological treatment processes.
- Total Suspended Solids—The increased number of total suspended solids (TSS) can also overwhelm biological treatment processes.



Compliance Assistance: Salt Storage

For the purpose of this article, "Salt" includes solids such as sodium chloride, potassium chloride, calcium chloride, and magnesium chloride.

Currently, IWBC has no specific regulations governing the storage of salt. However, regulations do prohibit unauthorized discharges of wastewater, chemicals or pollutants into street inlets or through sewer manholes, without prior written approval from the City. IWBC considers brine created from runoff from salt storage to be an industrial wastewater.

If your facility has a salt storage/pile, either year-round, or in preparation for winter, it is important to take steps to minimize the possibility of runoff.

- Outdoor piles should be located in appropriate areas. Make sure salt is not stored in areas prone to flooding, or near sewer inlets.
- Salt should be stored on an impervious pad, large enough to contain the salt and provide maneuvering room.
- Stored salt should be covered. Weatherproof tarps can work well to cover stored salt. Make sure the covering is well secured.

If you observe runoff from a salt pile, or any industrial wastewater runoff at your facility to the City's Sewer System, you are required to report this unauthorized discharge to the city. As required in Part IV, Section (2) of your Permit, oral notification is required within one (1) hour of becoming aware of the discharge, and a written report fully describing the event is due within five (5) days. A full description of what is required for the written report can be found in Part IV of the Permit. Such procedures must also be described in your facility's Accidental Spill Prevention / Slug Control Plan, as described in Part IV, Section (3) of the Permit.

Runoff from salt stored outside can occur during rainfall events. Checking on the status of your salt storage following rainfall events can help identify spills shortly after they occur. However, the most important step is preventing spills before they occur.

In addition to salt storage, the advice here can be generalized to any chemicals stored at your facility, particularly those stored outside, as loose solids, or both.

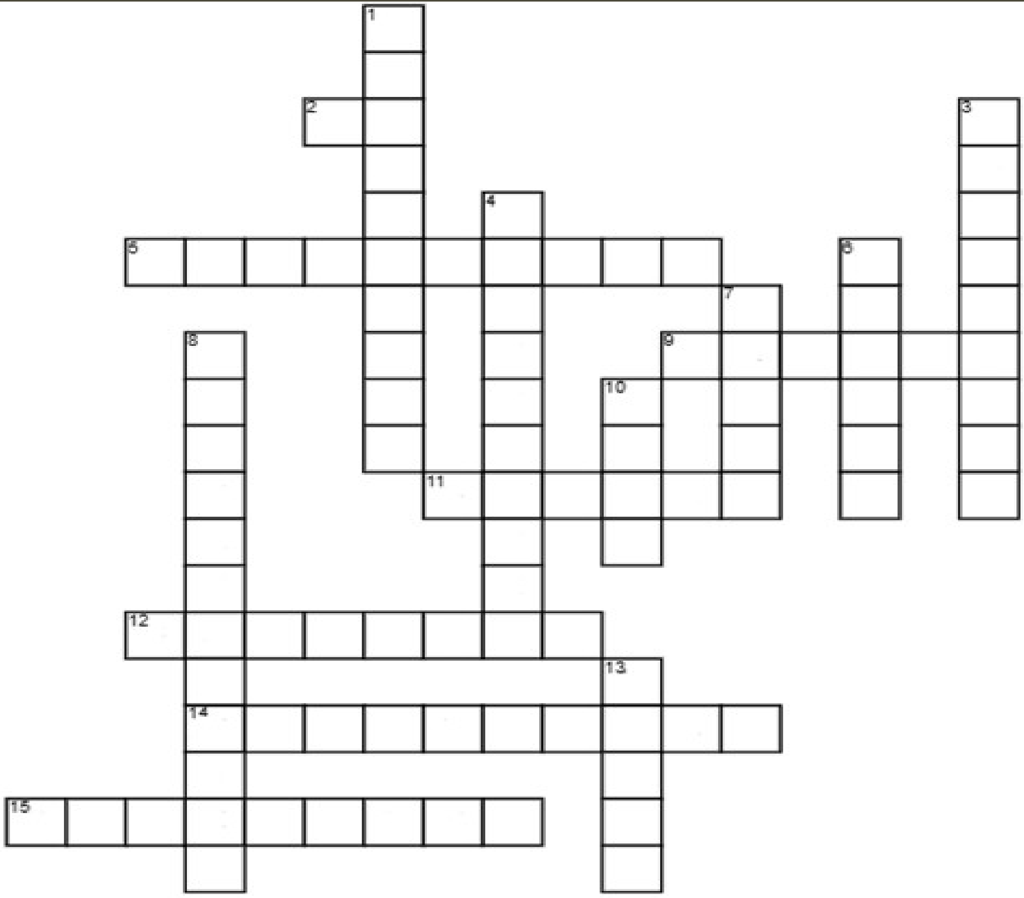
Chemical Storage: Tips for Preventing Spills

One crucial component in avoiding non-compliance is ensuring proper chemical storage at your facility. As with all types of non-compliance, prevention must be the top priority, and ensuring chemicals are stored using safe, spill-resistant methods is a simple and effective way to prevent dangerous and costly spills.

- Most industrial chemicals have an associated Safety Data Sheet (SDS), which should be readily available for employees of your facility. SDS include storage recommendations and guidelines, as well as a list of incompatible materials/chemicals.
- Incompatible materials should always be stored separately, in order to prevent any additional reactions in the event of a spill. Incompatible materials can react to produce combustion or explosion risks, toxic or corrosive vapors, and many other health concerns, which pose a risk to both employees of your facility and workers at the POTW.
- To reduce the risk of a spill, chemicals should be stored in a contained area, without floor drains or other entry points to the City's Sewer System, whenever possible. A raised section of floor in doorways can help contain spills to a single room, and prevent accidental discharge.
- If chemicals must be stored near a drain, it may be advisable to dike or plug these drains, in order to prevent any discharge to City sewer systems.
- Chemical storage areas should be inspected regularly, to catch any signs of a leak or spill before it occurs. Preventing spills before they occur is key.
- For any outside chemical storage, rainfall can be a major concern. Chemicals should be stored in a covered area and sealed whenever possible. Additionally, any chemicals stored outside should be kept separate from any manholes or inlets. Dikes, or bund walls, can be useful in containing chemicals in the event of a spill, or if rainfall results in an overflow.
- A properly designed bund wall must be high enough to contain the full volume of the chemicals stored inside the walled area. The larger the volume, and the smaller the area, the higher the wall should be,
- All spill prevention details should be included in your facility's Accidental Slug/Spill Prevention Plan. An updated copy of the plan is due every five years, three months after a new permit is issued.

Properly managing the chemicals stored at your facility is an important component of maintaining compliance and avoiding accidental discharges. Accidental spills or discharges can result in dangerous conditions for your employees and City employees, and potentially incur penalties and enforcement actions.

Industrial Waste Crossword Puzzle



Across
2. Figure that expresses the acidity or alkalinity of a solution.
5. The state or fact of according with or meeting rules or standards.
9. An official document giving someone authorization to do something.
11. Name of the water treatment plant to which you must send your signatory forms.
12. Relating to the conditions that affect hygiene and health, especially the supply of sewage facilities and clean drinking water.
14. Observe and check the progress or quality of (something) over a period of time.
15. A representative who has been authorized to send and receive documents with the governing body.

Down
1. Name of the river cutting through Philadelphia.
3. A substance introduced into the environment that has undesirable effects.
4. Water that has been used in the home, in a business, or as part of an industrial process.
6. A small part or quantity intended to show what the whole is like.
7. An underground conduit for carrying off drainage water and waste matter.
8. An act or instance of treating something in advance.
10. Sewage treatment plant owned, and usually operated, by a government agency.
13. A large natural stream of water flowing in a channel to the sea, a lake, or another such stream.

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

Jennifer L. Moore
215-685-6085

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

For general questions on Wastewater Discharge Permits, contact your Permit Administrators listed below:

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

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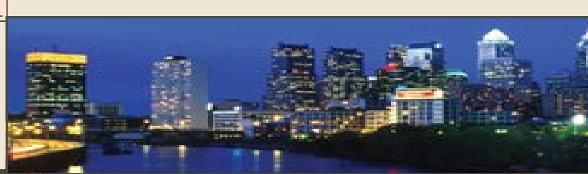

Visit the Industrial Waste Unit Online at: https://water.phila.gov/industrial-waste/