

The Pretreatment Times

January 2026 - Volume 32

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

**Closure of a Wastewater
Discharge Permit – Pg 2**

**Dilution Versus Treatment
– Pg 3**

**PWD is Applying to Be-
come CROMERR Compli-
ant – Pg 4**

**Industrial Waste Cross-
word Puzzle – Pg 5**

Reminders

Semi-annual Compliance Report

- Due January 31, 2026

- 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>

Closure of a Wastewater Discharge Permit:

Whether your facility is terminating all operations, or just ending certain operations, it is crucial that the requirements of your Permit be followed up until the time that the Permit is terminated, if that is the case. Below are suggestions and tips for maintaining your compliance status throughout any operational closures:

- The most important step is the submission of a Closure Statement. As stated in Part IV, Section (5) of your permit, a Closure Statement is required thirty (30) days prior to the termination of all or part of the facility operations which are regulated by the Permit.
- In Part IV, Sections (5)(a) through (5)(i), the requirements for a Closure Statement can be found:
 - (a) Company name and address (where regulated process(es) are or were located);
 - (b) Name and telephone number of company contact person;
 - (c) Closure date(s) of regulated process(es);
 - (d) List of other process(es) that will continue to operate at same location;
 - (e) Indication of whether a water shut-off request has been filed if entire facility has/will shut down;
 - (f) Ultimate plans for disposal of building(s), equipment and materials;
 - (g) Schedule for (f), above;
 - (h) Receipts and manifests for disposal of hazardous wastes/materials, etc.;
 - (i) A certification statement, signed and dated by an authorized representative of the Industrial User, as required by Part IV, Section (1)(a)5 above.

The processes regulated in your Permit can be found under Part I, Section (2). If any of these processes are being terminated, a Closure Statement is required.

A Closure Form, which lists all the required information, can be found on our website: [Industrial Waste Resources – Philadelphia Water Department](#)

Dilution Versus Pretreatment:

One of the EPA regulations enforced via your Permit is the prohibition of dilution as a substitute for treatment. The use of additional water from any source to replace or substitute, even partially, adequate treatment, is a violation of your Permit and can lead to enforcement actions, up to and including monetary fines.

Examples of dilution as a substitution for treatment include:

- Running a sink, hose, or other water source longer than necessary as part of cleaning operations. Using water to clean is not always dilution, certain cleaning operations require a flow of water. However, using more water than is needed is considered dilution as a substitute for treatment.
- Introducing wastewater from unregulated processes/operations to your process wastewater flow, prior to designated sampling points.

Dilution of this nature can be avoided in a number of ways:

- Establish a Best Management Practice (BMP) for cleaning operations, particularly cleaning which uses a volume of water determined by an individual employee. By following a BMP, regardless of the employee, the same volume of water will be used for each cleaning.
- Identify a sampling point which captures only the wastewater from regulated processes, before any comingling can occur. If necessary, a sampling point may need to be constructed, if an existing option is not available.

Depending on the nature of your facility and the compliance limits listed in your permit, various treatment methods and technologies are available to ensure you remain in compliance.

PWD IS APPLYING TO BECOME CROMERR COMPLIANT

The Philadelphia Water Department has applied to the EPA to become CROMERR Compliant!

What is CROMERR?

CROMERR is a reference to the Cross Media Electronic Reporting Rule under the NPDES e-reporting Rule that would allow Philadelphia Water Department to accept electronic reports and application in the future.

How does it affect the Pretreatment Program?

Once approved, The Philadelphia Water Department would be moving towards requiring all wastewater permit applications and reports to be submitted electronically.

What do I need to do now?

No changes have been made currently. Notification will be provided when the program is active.

Next Steps

Some facilities are being asked to submit data to test the program. If your facility is interested in helping the PWD testing CROMERR, reach out to your Permit Administrator.

All Semi-Annual Compliance Reports (SACR) must still be mailed to your Permit Administrator at the following address:

Attn: Permit Administrator
PWD—Industrial Waste & Backflow Compliance Unit
Baxter WTP
9001 State Rd.
Philadelphia, PA 19136

All new and renewal permit applications must still be mailed to the following address, rather than the Permit Administrator:

Attn: Jennifer L. Moore
PWD-Industrial Waste & Backflow Compliance Unit
1101 Market Street, 6th Floor
Philadelphia, PA 19107

Submitting a new or renewal permit application? Ensure all applicable sections are completely filled out! The permit application form was revised on 9/1/2025, and now includes a section for NAICS industry code as well as SIC industry code. Please include both industry codes for all facility processes listed in your application.

The revised permit application form can be found here: [Industrial Waste Resources – Philadelphia Water Department](#)

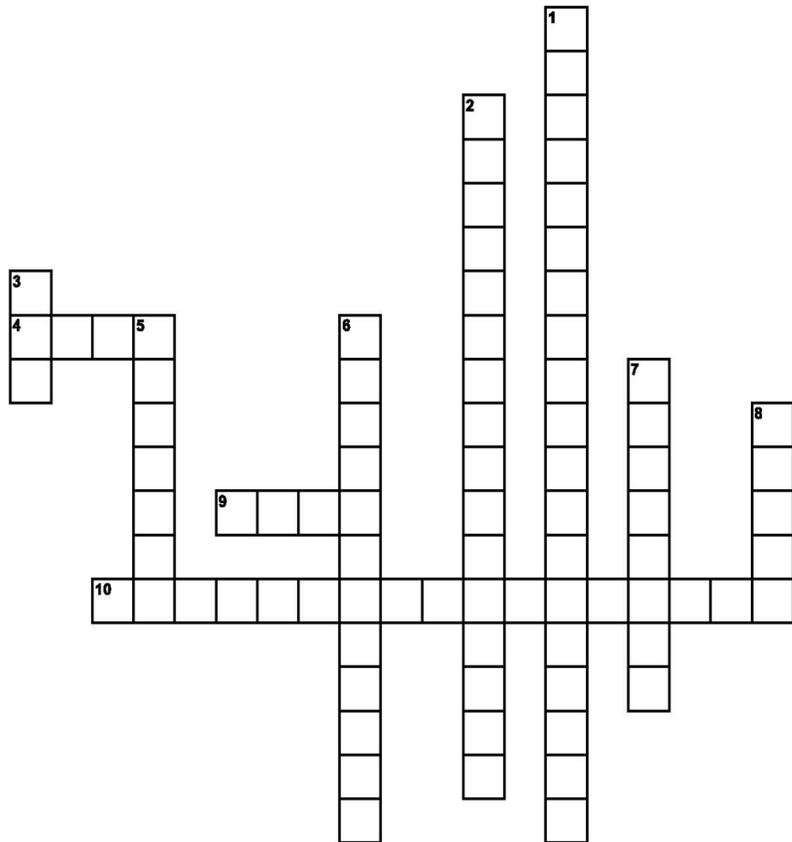
Industrial Waste Crossword Puzzle

Across

- [4] The abbreviation for the PWD unit which issues permits
- [9] The report due twice per year from an Industrial User
- [10] A semiannual newsletter issued by the PWD

Down

- [1] The proper recipient of semi-annual compliance reports
- [2] The submission required before any facility operations are terminated
- [3] Another type of industry code required in permit applications
- [5] An electronic reporting system
- [6] Physical, biological, or chemical processes which reduce, eliminate, or transform pollutants in a wastestream
- [7] An unacceptable substitute for treatment
- [8] One type of industry code required in permit applications



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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

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

