



MISSION STATEMENT

The mission of the Industrial Waste Unit (IWU) 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.

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REMINDER

Semi-Annual Compliance Reports are Due NO LATER THAN July 31, 2026.

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

Failure to submit your Semi-Annual Compliance Report will result in Significant Non-Compliance!

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>



Flow Reporting

Why flow reporting is important?

All Industrial Users are required to report accurate flow volumes in the Baseline Monitoring Report (BMR) and in periodic reporting (Semiannual Compliance Reports), as required by 40 CFR 403.12(b).



Required flow reporting in the BMR

It is important that you report accurate flow breakdowns for each wastestream at your facility to ensure that the CWF, if applicable, is calculated correctly. Below is a summary of the flow totals that must be reported:

Regulated:

Total flow for each regulated process subjected to categorical pretreatment standards.

Dilute:

- Sanitary wastewater from bathrooms, breakrooms, or dining areas.
- Noncontact cooling water and boiler blowdown.
- Wastestreams listed in Appendix D to 40 CFR Part 403 (considered dilute for all pollutants).

Unregulated:

Total flow for each unregulated process that is not subjected to categorical pretreatment standards and is not considered a dilute wastestream, as described above.

Required flow reporting in SACR

In the semiannual Compliance Reports (SACR), you must include:

- Average and maximum daily wastewater flow (GPD) from your facility.
- Average and maximum flow per minute (GPM).
- Any change in flow volume. A 20% increase or decrease in your facility's process flow and operation must be reported.



Remember

Include a wastewater flow diagram that shows the flow path of all wastestreams generated at the facility, identifies where streams are combined, indicates which streams discharge separately to the sewer system without commingling, identify all on-site treatment locations, and marks the sampling point(s).

Any change in facility operations, such as the addition or removal of processes, must be reported. If wastewater streams are being modified as part of that change, the new flow totals must be reported.

In this note, dilution is specifically prohibited as an alternative treatment as stated in 40 CFR 403.6(d), which prohibits any industrial user from increasing the use of process water or otherwise attempting to dilute a discharge as a substitute for adequate treatment.

Breakdowns of flow totals and a wastewater flow diagram are required, regardless of whether your permit includes a CWF.

References:

<https://www.epa.gov/system/files/documents/2021-07/owm0260.pdf>

eCFR :: 40 CFR Part 403 -- General Pretreatment Regulations for Existing and New Sources of Pollution

Odor Control and Prevention

Odor is one of many parameters that must be considered when dealing with industrial wastewater, even if it cannot be as directly quantified and measured. Foul odors or smells should be monitored and controlled for a number of reasons:

- ♦ Odor can be one of the first signs of other issues in a pretreatment system. Stagnant or slow-moving water can lead to increased odor, and if left unaddressed, can lower the efficiency of treatment systems or a slug discharge of pollutants.
- ♦ A number of pollutants can be identified by odor, Ammonia and Hydrogen Sulfide being common examples. More noticeable smells can indicate an increased presence of pollutants, which may be a result of a breakdown somewhere in the treatment process.
- ♦ Some odors aren't just offensive but can pose a risk as well. Certain odors indicate the presence of harmful gases, which can be corrosive, flammable, or toxic, all of which pose a risk to sewer infrastructure as well as human health.

According to Philadelphia Water Department regulations section 501.3(b)(5), "any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or may result in toxic gases, vapor or fumes or are sufficient to prevent entry into the POTW for maintenance and repair without respiratory protection or other personal safety equipment" the discharge of wastewater meeting this criteria would constitute a violation, which can result in enforcement actions, up to and including monetary fines.



While it is not uncommon for wastewater collection or pretreatment systems to develop an unpleasant smell, any new odors, or an increased intensity, warrant investigation. Identifying the specific odor can help you to determine possible causes and move towards correction. Identifying and tackling odors can help prevent both operational upsets and violations.



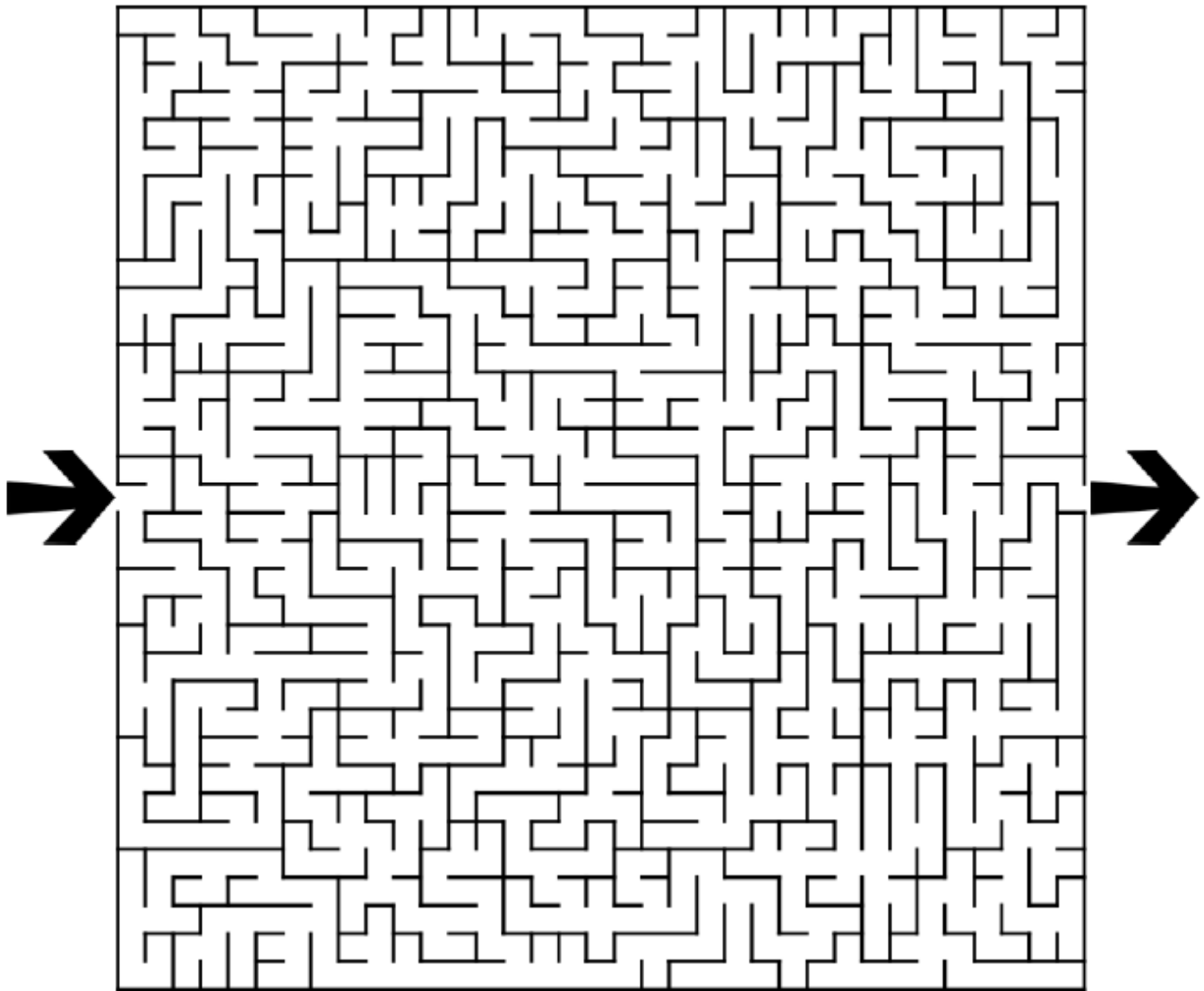
There are many ways to help reduce or prevent foul odors in a pretreatment system and prolong the lifespan and/or efficiency of the equipment at the same time. Below are a few examples, though the specific method will depend on the nature of your facility and the odor identified:

- ♦ Keep detention times low. Stagnant or slow flowing water promotes the buildup of biofilm and waste, both causes of odors. Stagnant water can often be found in curves or bends in pipes, particularly when flow rates are low.
- ♦ Regular cleaning, particularly of screens and filters. Waste material collected by screens and filters accumulates over time, which can not only produce unpleasant smells, but can reduce the lifespan and efficiency of the equipment.
- ♦ Chemical or mechanical treatment. Some foul smelling pollutants can be removed or neutralized with the proper treatment. Like any modification to your pretreatment system, notification must be issued to your Permit Administrator prior to any changes.

Reference:

<https://www.epa.gov/sites/default/files/2018-11/documents/order-control-biosolids-management-factsheet.pdf>

Pretreatment Maze



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

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Jennifer L. Moore

215-685-6085

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

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



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