

# The Pretreatment Times



## 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.*

Volume 5

January 2012

## Inside This Issue

### What's Inside?

In the "Compliance Assistance" section we discuss two reporting requirements for permitted Significant Industrial Users.

Signatory Requirements - Are your reports being signed by an authorized representative? Turn to page 3 to learn who is authorized to sign your reports.

Permit Transfer - Did you know there are specific compliance requirements for changing your facility's name or ownership? Turn to page 2 for more information.

In "Water Department News" we discuss the Department's new Stormwater Credits program.

Stormwater Credits - Did you know that your facility may qualify for a reduction on the stormwater portion of your PWD bills? Turn to page 4 for more information on stormwater credits and what you can do to reduce your bills.

Compliance Assistance	2-3
Signatory Requirements	2
Permit Transfer	3
Stormwater Credits	4
IWU Contact Information	4



## PWD PLANT TOURS

Are you interested in getting an inside look at how the City treats its drinking water and wastewater? The IWU will be scheduling tours of Philadelphia's three wastewater treatment plants (Northeast, Southwest and Southeast) and three drinking water treatment plants (Baxter, Queen Lane and Belmont). Any Industrial User interested in touring a plant should contact IWU at 215-685-6236.

## REMINDERS:



Semi-Annual Compliance Reports are Due:  
NO LATER THAN January 31, 2012

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

If your report has not been received you will find yourself in Significant Non-Compliance!!

# Compliance Assistance

## Notification Requirements for your Wastewater Discharge Permit

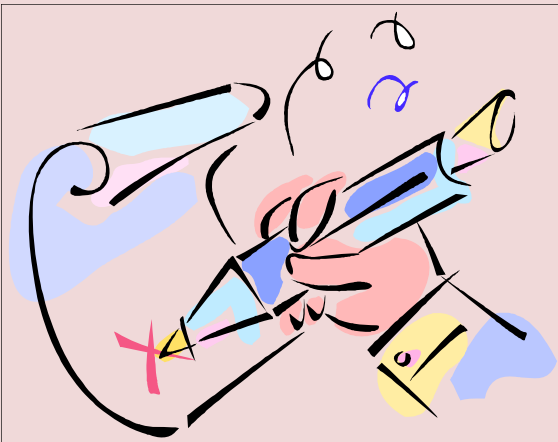
Industrial Users regulated by the City of Philadelphia's (City) Wastewater Discharge Permits are subject to a number of reporting requirements. Reporting requirements are identified in the Standard Conditions (Parts IV through VI) of your Wastewater Discharge Permit. It is important for permittees to be aware of these requirements, as failure to comply will result in permit violations and may result in Significant Non-Compliance (SNC) and monetary fines.

As part of *The Pretreatment Times'* on-going series of compliance assistance articles, this issue we will focus on two reporting requirements: Signatory Requirements and Permit Transfer.

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### Signatory Requirements

All applications, reports and information submitted to the IWU by a permitted Significant Industrial User (SIU) must be signed by an authorized representative of the Industrial User. Signatory requirements can be found in Part VI, Section 4 of your facility's Wastewater Discharge Permit.



#### **Who is authorized to sign documents submitted to PWD?**

In general, an authorized representative is anyone who has the authority to make management decisions that govern the construction and operation of the regulated facility. The position occupied by a authorized representative can vary depending on the business structure. Your permit specifically identifies an authorized representative's title for corporations, sole proprietorships, or partnerships. Consult Part VI, Section 4 (a) & (b) of your permit for specific definitions of who qualifies for this designation.

#### **What is a "Duly Authorized Representative"?**

If a company's authorized representative (as defined in Part VI, Section 4 (a) & (b)) would like to confer signatory authority to another employee, they may designate a duly authorized representative for signing reports. The SIU must meet specific requirements (see Part VI, Section 4 (c)) for designating a duly authorized representative. In addition to specific qualifications for who can be a duly authorized representative, the SIU must submit written authorization for this designation to the IWU.

#### **What happens when there is a change at the facility?**

If a duly authorized representative no longer meets the signatory requirements, a new authorization must be submitted to the City prior to or together with any reports to be signed by an authorized representative.

To help permittees achieve compliance with the designation of a duly authorized representative the IWU has developed a form that may be used for designation of a duly authorized representative (a copy of the form is included with this issue of *The Pretreatment Times*). The "Signatory Designation Form" can also be found on the IWU's webpage ([www.phila.gov/water/IWU.html](http://www.phila.gov/water/IWU.html)) "SIU Wastewater Discharge Permits" section and the "Downloads" section.

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# Compliance Assistance

## Notification Requirements for your Wastewater Discharge Permit

### Permit Transfer

Permit transfer is required anytime the name of a regulated facility is changed or a regulated facility is purchased by another entity. The limitations placed on this transfer are found in Part VI, Section (6) of your wastewater discharge permit. *This section requires notification of IWU at least 30 days prior to any name or ownership change.* This advance notification will allow sufficient time for permit changes to be evaluated and incorporated. Failure to notify IWU prior to any change will result in a permit violation and may result in SNC and mandatory fine assessment.

Notifications of permit transfer must contain specific information, as required by Part VI, Section (6) of your permit. When notifying the City of a name or ownership change, the City must receive the following information:

1. The date the proposed change will occur.
2. The name and address of the permitted facility.
3. The name and address of the current facility owner.
4. The name the facility will be operating under after the proposed change.
5. The name and address of the facility owner after the proposed change.

If the permit transfer is due to a change in ownership, the **new owner** must also certify to all of the following conditions to satisfy this reporting requirement:

1. The new owner and/or operator has no immediate intent to change the facility's operations or processes.
2. The new owner acknowledges full responsibility for complying with the existing wastewater discharge permit.
3. The new owner acknowledges full responsibility for correcting all pre-existing violations, including, but not limited to, implementing corrective action plans and paying fines.

To help permittees achieve compliance with this reporting requirement, the IWU has developed a form that may be used for notifying the City of any name or ownership change. The IWU is including a copy of the form with this issue of *The Pretreatment Times*. The "Name or Ownership Change Notification Form" can also be found on the IWU webpage ([www.phila.gov/water/IWU.html](http://www.phila.gov/water/IWU.html)) "SIU Wastewater Discharge Permits" section and in the "Downloads" section.

APRIL 12 & 13, 2012

## 21st Annual Industrial Pretreatment Conference



THE INN AT READING  
READING, PA



For more information visit:  
[www.epwpcoa.org](http://www.epwpcoa.org)

# Water Department News

## Parcel-Based Stormwater Management Service Charges

### Stormwater Credits

The Stormwater Credits Program was developed in conjunction with the new parcel-based stormwater charges. The transition from a meter-based to a parcel-based charge for stormwater began on July 1, 2010 with annual incremental increases, where full implementation is expected to occur by July 1, 2013. The parcel-based stormwater charges were developed to provide a more equitable way for the Philadelphia Water Department to charge its customers based on the true cost of service for stormwater management.

The Stormwater Credits Program provides non-residential customers with a monetary incentive to better manage stormwater on their property. Stormwater credits not only reduce a customer's stormwater bill, but they also encourage the construction of stormwater management practices (SMPs). Additional SMPs in the City help the Water Department meet its long-term stormwater management goals. Three different types of stormwater credits are offered: a Gross Area Credit, an Impervious Area Credit, and a NPDES Credit. Gross Area Credits reward customers that have large, green properties. The Gross Area Credit is calculated by assigning the different cover types on the property a curve number. The curve number represents the runoff potential of a particular cover type. The higher the curve number the greater runoff potential a site will have on the sewer or receiving water body. Gross Area Credits are applied only towards the Gross Area fee of the stormwater charge. The Impervious Area Credit is based on the management of the first inch of stormwater runoff from the property. Management of the first inch of runoff can include, but is not limited to, green roofs, porous pavement, infiltration basins, rain gardens, and bio-retention areas. The NPDES Credit is given to customers that are in compliance with their NPDES Industrial Stormwater Permit held by the PA DEP. The NPDES Credit is a 7% reduction from the total stormwater charge.

Stormwater Credits can be applied for at any time by submitting a Stormwater Credits Application, supporting documentation and the \$150 application fee. Stormwater Credits, upon approval, are active for four years and will need to be renewed by submitting a renewal application and a renewal fee of \$50. The Stormwater Credits renewal is solely based on the operation and maintenance of the approved management practice. The application, renewal application, and more information regarding the Stormwater Credits Program can be found at the web address provided below. For any Stormwater Credits questions, please call (215)-685-6070 or email us at: PWD.Stormwatercredits@phila.gov. You can also visit the Stormwater Billing and Credits Website at: [http://www.phila.gov/water/Stormwater\\_billing.html](http://www.phila.gov/water/Stormwater_billing.html).

## Industrial Waste Unit Contact Information

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

For comments on draft permits contact us at:

Industrial Waste Unit  
1101 Market Street, 3rd Floor  
Philadelphia, PA 19107

Phone 215-685-6236  
Fax 215-685-6232



For questions about your permit:

Baxter Water Treatment Plant  
9001 State Road  
Philadelphia, PA 19136  
Joe Cerrone 215-685-8030  
Bob Gonsiewski 215-685-8093  
Evan Schofield 215-685-8068

Visit the Industrial Waste Unit Online at: [www.phila.gov/water/IWU.html](http://www.phila.gov/water/IWU.html)

**INDUSTRIAL USER SIGNATORY DESIGNATION FORM  
GENERAL INSTRUCTIONS**

1. The information requested in the enclosed form is required for Industrial Users wishing to designate an authorized representative for signing reports to the City of Philadelphia (City).
2. Please complete the attached form and return it to your permit administrator at the following address:

Baxter Water Treatment Plant  
9001 State Road  
Philadelphia, PA 19136

*If you have any questions, please contact your permit administrator*

**SPECIFIC INSTRUCTIONS**

- Item 1.** A.-B. Provide all requested information about the facility.
- Item 2.** A.-B. Provide all requested information regarding the facility representative being designated as the authorized signatory for the facility's reports to the City. See "Signatory Requirements" below, section (c)(2), for definition of who may be designated to sign facility reports.
- Item 3.** This report must be certified and signed by an authorized representative as well as the designated signatory. See "Signatory Requirements" below, sections (a) and (b) for the definition of authorized representatives of and Industrial User and section (c) for definition of who may be designated to sign facility reports.

**Signatory Requirements – Wastewater Discharge Permit Part VI, Section 4**

All applications, reports or information submitted to the City as required by this Permit shall be signed and certified as specified at 40 CFR 403.12(l) by an authorized representative defined as one of the following:

- (a) By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:
1. a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation; or,
  2. the manager of one or more manufacturing, production or operation facility, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (b) By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship, respectively.
- (c) By a duly authorized representative of the individual designated in paragraph (a) or (b) of this section if:
1. The authorization is made in writing by the individual described in paragraph (a) or (b);
  2. The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
  3. The written authorization is submitted to the City.
- (d) If an authorization under paragraph (c) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (c) of this section must be submitted to the City prior to or together with any reports to be signed by an authorized representative.



INDUSTRIAL WASTE UNIT  
INDUSTRIAL USER SIGNATORY  
DESIGNATION FORM



This form may be used by an Industrial User establishing an authorized representative responsible for reviewing and signing reports required by the User's wastewater discharge permit. Carefully review the attached instructions and necessary conditions under which a person may be designated as a signatory of an Industrial User's reports.

1) Company Information

A. Facility Name: \_\_\_\_\_

Facility Address: \_\_\_\_\_

B. Permit #: \_\_\_\_\_

2) Signatory Information

A. Date of Designation: \_\_\_\_\_

B. Designated Signatory: \_\_\_\_\_

Signatory Title: \_\_\_\_\_

Signatory Address: \_\_\_\_\_

Signatory Phone #: \_\_\_\_\_

3) Certification Statement

All applications, reports or information submitted to the city as required by a Wastewater Discharge Permit shall be signed and certified by an authorized representative as specified at 40 CFR 403.12(l).

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

\_\_\_\_\_  
Representative Conferring Signatory Authority

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Authorized Representative

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

## **INDUSTRIAL USER COMPANY NAME/OWNERSHIP CHANGE NOTIFICATION FORM GENERAL INSTRUCTIONS**

1. The information requested in the enclosed form is required for Industrial Users wishing to transfer a permit due to a company name or ownership change pursuant to Wastewater Discharge Permit Part VI, Section 6 "Limitation of Permit Transfer" (see below).
2. Please complete the attached form and return it to the Industrial Waste Unit at the following address:

PWD-IWU  
1101 Market Street, 3<sup>rd</sup> Fl  
Philadelphia, PA 19107

*If you have any questions, please contact your permit administrator*

### **SPECIFIC INSTRUCTIONS**

- Item 1.** A.-D. Provide all requested information about the facility.
- Item 2.** A.-E. Provide all requested information regarding the future facility name and/or ownership. The date of change must be at a minimum thirty (30) days prior to the date of this signed form.
- Item 3.** A.-C. If this form is notifying the City of a change of ownership, each condition in this section must be agreed to prior to permit transfer. Initial next to each permit transfer requirement.
- Item 4.** This form must be signed by an authorized representative of the future owner. See Wastewater Discharge Permit Part VI, Section 4 "Signatory Requirements" for the definition of who qualifies as an authorized representative of an Industrial User. If the future owner will be designating an Authorized Representative for signing facility reports to the City, please include the appropriate designation information with this notification. ([http://www.phila.gov/water/IWU\\_PDFs/SD\\_Form.pdf](http://www.phila.gov/water/IWU_PDFs/SD_Form.pdf))

### **Limitation of Permit Transfer – Wastewater Discharge Permit Part VI, Section 6**

This Permit is neither assignable nor transferable without prior written approval of City. Transfer or sale of Industrial User shall obligate the purchaser to seek prior written approval of City for continued discharge of process wastewater into the POTW.

Industrial User shall submit to the City, for the City's approval, a written notice of the intent to transfer permit at least thirty (30) days in advance. The notice to the City must include a written certification by the new owner or operator which:

- (a) States that the new owner and/or operator has no immediate intent to change the facility's operation or processes; and,
- (b) Identifies the specific date on which the transfer is to occur; and,
- (c) Acknowledges full responsibility for complying with the existing wastewater discharge permit; and,
- (d) Acknowledges full responsibility for correcting all preexisting violations, including, but not limited to, implementing corrective action plans and paying fines.



**INDUSTRIAL WASTE UNIT  
INDUSTRIAL USER  
COMPANY NAME/OWNERSHIP CHANGE  
NOTIFICATION FORM**



This form may be used by an Industrial User wishing to transfer their permit due to a company name or ownership change. Industrial User shall submit to the City, for the City's approval, this written notice of the intent to transfer their Wastewater Discharge Permit at least thirty (30) days in advance of any change.

1. Current Company Information

- A. Facility Name: \_\_\_\_\_
- B. Facility Address: \_\_\_\_\_  
\_\_\_\_\_
- C. Name of Owner: \_\_\_\_\_
- D. Address of Owner: \_\_\_\_\_  
\_\_\_\_\_

2. Future Facility Name and Company Information

- A. Date of Change: \_\_\_\_\_
- B. Name of Facility: \_\_\_\_\_
- C. Name of Owner: \_\_\_\_\_
- D. Address of Owner: \_\_\_\_\_  
\_\_\_\_\_
- E. Owner Phone Number: \_\_\_\_\_

3. Required Change of Ownership Acknowledgements

- A. \_\_\_\_\_ The new owner and/or operator has no immediate intent to change the facility's operation or processes, and
- B. \_\_\_\_\_ accepts full responsibility for complying with the existing wastewater discharge Permit, and
- C. \_\_\_\_\_ acknowledges full responsibility for correcting all preexisting violations, including, but not limited to, implementing corrective action plans and paying fines.

4. Certification Statement

Any person signing a document shall make the following certification as specified in Section 501.6(k) of the Philadelphia Water Department Regulations. As required by Section 501.6(l) of the Philadelphia Water Department Regulations all applications, reports or information submitted to the City shall be signed and certified by an authorized representative.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision In accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

\_\_\_\_\_  
Authorized Representative of Future Owner

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date