

# 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 7

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## Inside This Issue

## What's Inside?

- ◆ "Compliance Assistance" offers suggestions for avoiding Significant Non-Compliance (SNC) and mandatory fines for pH violations.
- ◆ Information about an upcoming pretreatment conference hosted by the Eastern Pennsylvania Water Pollution Control Operators Association (EPWPCOA).
- ◆ The Water Department's rates changed January 1, 2013. See page 3 for information about these changes.
- ◆ Information about the PWD's recent groundbreaking for its cogeneration project.
- ◆ News about a local Industrial User sentenced for Environmental Violations.

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## 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 Water Pollution Control 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. **The Northeast Water Pollution Control Plant Tour is being scheduled now for June 2013.**

## REMINDERS:



Semi-Annual Compliance Reports are Due:  
NO LATER THAN January 31, 2013

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

### Strategies for Avoiding SNC from pH violations

Unlike other regulated parameters, the ease and speed of pH monitoring allows users multiple strategies for avoiding SNC and mandatory fines caused by having more than 33% of their samples out of compliance during a six-month period. This is a ratio that you can and should monitor yourself for all of your regulated pollutants. We recommend the following strategies to maintain an accurate accounting of this percentage and assist in avoiding SNC for pH based on this measure:

- ◆ Read Lab Reports Promptly – Check with your laboratory and ask them to report pH monitoring results to you immediately. In the case of pH monitoring, your laboratory should be determining the pH of your facility's effluent at the time they are collecting samples. Don't forget that if your pH sample is not in compliance with your permit limits you must:
- ◆ Resample when out of compliance – Your permit requires you to resample when any parameter is out of compliance and show a return to compliance. For pH, this resample can happen as soon as 15 minutes after the previous sample. Once a pH sample has shown a return to compliance, you have met this requirement, but you may still be in SNC based on your percentage of noncompliant samples. If you find that you still have more than 33% of your samples out of compliance:
- ◆ Take More Samples – Bring the percentage of noncompliant samples down by increasing the number of compliant samples analyzed. Your permit requirements specify a *minimum* frequency at which you must sample for the purpose of compliance. It may be in your best interest to sample more frequently than the permit requires. Remember, you can sample for pH as often as every 15 minutes. As an alternative to taking grab samples to determine effluent pH you may want to:
- ◆ Consider Continuous Monitoring – Continuous monitoring can greatly reduce the likelihood of SNC for pH. The definition of SNC is the same for grab sample and continuous pH monitoring; however, with continuous monitoring, your percentage of samples out of compliance is determined by dividing the amount of time out of compliance by the total time pH was monitored (i.e. – for a user monitoring continuously over the first 6 months of a year, SNC is only reached if pH is out of compliance for 1444 hours!!) Remember, that you are always required to meet the minimum monitoring frequency requirements in your permit. To be sure that you are prepared in the event that a continuous pH monitor fails, you should have a contingency plan in place for the collection of grab samples.

## 22nd ANNUAL INDUSTRIAL PRETREATMENT CONFERENCE



**APRIL 18 & 19, 2013**

AT THE INN AT READING  
READING, PA



<http://www.epwpcoa.org>

## Water Department News - Water Commissioner Endorses Decision of Independent Hearing Officer for Smaller Increase to Water/Sewer Rates

**PHILADELPHIA** – Water Commissioner Howard Neukrug has set the new water, sewer and stormwater rates that became effective on January 1, 2013. Rates will rise 17.5% over three years, which is significantly lower than the department’s original rates request of 28.5% over four years. The Department’s rates are still among the lowest in the region even after the rate increase.

The Commissioner’s rate decision is based upon a settlement between the Philadelphia Water Department (PWD) and Community Legal Services (CLS) - the public advocate appointed to represent residential customers- together with other parties in the rate case. The settlement addresses the PWD’s revenue requirements and allocation of costs among residential, commercial and industrial customers.

| Typical Residential Customer |   |                    |
|------------------------------|---|--------------------|
| Monthly Billing              |   |                    |
| Fiscal Year                  | Additional Monthly Water & Sewer Charge | Total Monthly Bill |
| 2013                         | \$3.31                                  | \$60.74            |
| 2014                         | \$3.50                                  | \$64.24            |
| 2015                         | \$3.19                                  | \$67.43            |

Michael Bowman, the Hearing Officer jointly appointed by Mayor Michael A. Nutter, City Council President Darrell Clarke and City Controller Alan Butkovitz to oversee the rate case, issued a report to the Water Commissioner agreeing with the Settlement determination and the Water Commissioner endorsed the Hearing Officer’s report and the spirit of cooperation embraced by all participating parties.

The additional monthly water and sewer charges and total monthly bill for an average residential customer under the settlement rates are shown in the above chart. In addition, the wastewater surcharge rates have decreased for five day biochemical oxygen demand (BOD<sub>5</sub>) have decreased from \$0.332/lb. to \$0.310/lb. and total suspended solids (TSS) have decreased from \$0.326/lb. to \$0.292/lb.

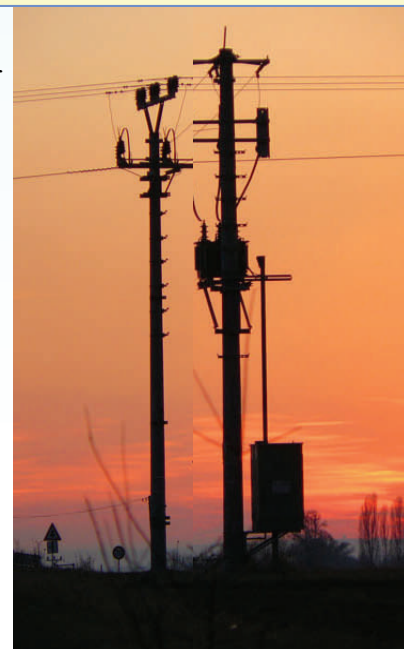
The Settlement is based on a three year rate period (Fiscal Years 2013-2015) versus the four year period originally proposed by PWD. The settlement reduces the revenue requirement from the original PWD proposal by \$33 million, from \$173 million in the first three year period to \$140 million. This change will reduce the average annual increases for a typical customer from 6.5% to 5.5% over the period 2013-2015.

## Water Department News- Groundbreaking of New Cogeneration Facility

The Philadelphia Water Department (PWD) recently broke ground on construction of an innovative wastewater biogas-to-energy facility. The Northeast Water Pollution Control Plant (NEWPCP) Biogas Project will generate electricity and thermal energy for use on-site, fueled mainly by biogas from the NEWPCP digesters. The project’s goals include:

- Maximizing the energy potential of the biosolids process by harnessing the untapped biogas waste stream, 57% of which is currently wasted to flares
- Reducing energy consumption by generating up to 5.6 MW of power
- Reducing CO<sub>2</sub> emissions by approximately 22,000 tons per year
- Increasing sustainability
- Enhancing environmental stewardship

For more information about this project please contact PWD’s Debjani Mallick at 215-685-6050.



## News Release: Nupro Industries Corporation Sentenced For Environmental Violations

**FOR IMMEDIATE RELEASE**

**July 27, 2012**

Nupro Industries Corporation, Philadelphia, Pennsylvania, was sentenced today to three years' probation and a \$200,000 fine for criminally tampering with samples of the wastewater it was discharging into Philadelphia's sewer system, announced United States Attorney Zane David Memeger and EPA Special Agent-in-Charge David G. McLeod, Jr.

Nupro Industries Corporation, which manufactures oils and esters at its plant at East Ontario and Bath Streets, in Philadelphia, pleaded guilty on March 2, 2012, to criminally tampering with a required monitoring method under the environmental laws. Under the environmental pretreatment permits that Nupro had with the City of Philadelphia, Nupro was required to monitor the pollutants in its industrial wastewater by taking representative samples of its wastewater and submitting the samples for testing for specified pollutants, such as pH and ethylbenzene. From 2006-2007, Nupro watered down the samples, making the samples non-representative, in order to dilute the pollutants and to appear to be in compliance with the pollutant limits under the permits.

In addition to probation and the fine, U.S. District Court Judge Robert F. Kelly ordered Nupro to undertake a \$25,000 community service project as designated by the Philadelphia Water Department. Nupro also was ordered to implement an Environmental Compliance and Ethics Plan as a condition of probation. Under this Plan, Nupro agreed to address and correct its environmental problems, to designate employees who are responsible for environmental issues and compliance at Nupro, and to annually train all of its employees on environmental compliance. Nupro was further ordered to publish in an appropriate trade journal and local newspaper, advertisements describing Nupro's conduct, its conviction and sentence, steps taken to prevent reoccurrence, and how other regulated entities can avoid similar prosecution.

"Companies have a responsibility to conduct their business in a manner that complies with the environmental laws and regulations which promote public safety," said Zane David Memeger, United States Attorney for the Eastern District of Pennsylvania. "Today's sentence sends a strong message to the business community that these laws and regulations are not optional."

"To assure compliance with environmental laws, governments need accurate information. Violators who submit false reports undermine the integrity of our program and inhibit our efforts to protect the public," said David G. McLeod, Jr., Special Agent in Charge of EPA's criminal enforcement program in Philadelphia. "Today's sentencing should serve notice that EPA will vigorously pursue charges against those who knowingly falsify official information and place the public at potential risk."

### 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  
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Philadelphia, PA 19107

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



For questions about your permit:  
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Visit the Industrial Waste Unit Online at: <http://www.phila.gov/water/IWU>