

PRETREATMENT CORNER

Tips on Writing an Industrial User Wastewater Discharge Permit

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Wastewater discharge permits are required to be issued to all Significant Industrial Users (SIUs) in one's sewer service area if the POTW has an EPA-approved industrial pretreatment program in the Commonwealth of Pennsylvania in accordance with regulations found at 40 CFR §403.8 (f)(1)(iii). Permits must be enforceable and must include the minimum requirements found at 40 CFR §403.8 (f)(1)(iii)(B) as follows:

- Statement of duration (in no case more than 5 years)
- Statement of non-transferability without prior notification to POTW
- Effluent limits, including best management practices
- Monitoring and reporting requirements
- Applicable civil and criminal penalties for violation of Pretreatment Standards and Requirements
- Slug discharge control requirements

Most people probably refer to EPA's September 1989 *Industrial User Permitting Guidance Manual* and subsequent EPA guidance when preparing wastewater discharge permits for the SIUs within their sewer service area. EPA guidance suggests organizing permits into the following categories:

- Cover page
- Effluent limits
- Monitoring requirements
- Reporting requirements
- Standard conditions
- Special conditions

However, just like anything else in life, can the same permit be used for all industrial dischargers? Just like two brothers who have many things in common, i.e., hair and eye color, same parents, etc.; these same two brothers have very distinct idiosyncrasies. And so do the two paper mills down the road from the wastewater treatment plant. One uses virgin paper; the other mill uses recycled paper. One mill uses chlorine to bleach the paper; the other mill does not use any chlorinated chemicals in their process.

The following list provides some examples of suggested permit items and/or conditions that can be tailored to each distinct SIU:

- Include photograph of facility site on cover of permit.
- Include written detailed description and photographs of sampling locations and flow meters.
- Include table showing which samples and/or test parameters must be collected as grab or composite samples and their respective monitoring frequency.
- Monitoring frequency can be based on several factors, including, but not limited to, federal pretreatment standards, SIU compliance history, overall SIU discharge's impact on POTW treatment plant, representativeness of discharge and monitoring costs.
- Specify type of composite sampling, i.e., time vs. flow proportional or 8-hour vs. 24-hour, based on the type of discharge from the SIU.
- Require submission of both concentration and mass loadings if SIU loadings have potential to upset POTW treatment plant.

- Clarify that “Monitor Only” parameters may be changed to actual permit limits within the permit cycle if discharges become excessive and need to be controlled.
- Depending on required test parameters, sampling containers for an automatic composite sampler may be specified, i.e., 2 ½-gallon glass container vs. 5-gallon plastic container vs. 24 individual plastic or glass bottles.
- Reiterate importance of holding time, especially for those parameters in which test data from more than one laboratory may show greater variation, i.e., the 48-hour holding time for BOD₅.
- If the sampling ability of SIU personnel is unknown or in question, include a provision reserving the right to require that all sampling shall be conducted by a laboratory accredited under the auspices of the Environmental Laboratory Accreditation program at 25 PA Code §252.
- If flow data is critical to determine mass loadings or to ensure that the POTW does not exceed its hydraulic capacity, include a provision to require the installation and routine calibration of a flow meter on the SIU wastewater discharge; and require that the flow calibration certificates be provided to the POTW.
- Require that all analyses be conducted by a laboratory accredited under the auspices of the Environmental Laboratory Accreditation program at 25 PA Code §252 and ask the SIU to submit a written request with proof of capability if the SIU chooses to conduct those analyses in-house that are categorized as accredited-by-rule, i.e., pH and Total Residual Chlorine.
- Names, mailing addresses and email addresses of all persons to whom SIU should send permit renewal applications, reports and other notifications.
- Waste surcharge pollutant levels and formulas for calculating the surcharge.

While the above list does not represent all potential issues that may arise with your SIUs, the list does provide a starting point for you to consider when reviewing and preparing the SIU discharge permits. We all have a common goal when implementing and enforcing an industrial pretreatment program and that is to prevent any unnecessary pollution from entering the environment. Therefore, it is in everyone’s best interest to treat all SIUs fairly so as not to impose excessive burdens or costs when they are not necessary.