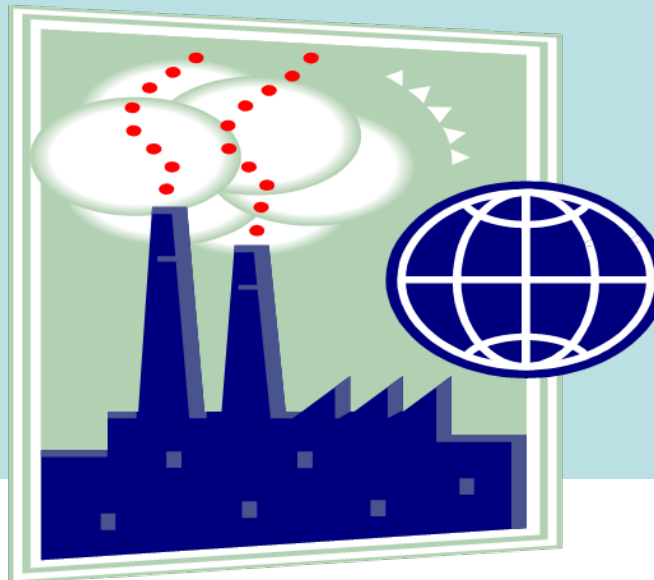


Creative Industrial Discharge Permits that work for the POTW as well as the Industry

GAWP Pretreatment Coordinators Meeting
May 6, 2008

- Which Industries are required to receive a discharge permit from the local POTW?
 - Must have “approved program”
 - All “SIU’s”
 - Also, as may be required to carry out the purposes of the SUO



What is a SIU?

- User who discharges 25,000 gpd, or more.
- User whose waste stream makes up 5% or more of the capacity of the treatment plant.
- User who has “a reasonable potential for adversely effecting the POTW’s operation.”

A Permit restricting the discharge of various wastewater constituents may utilize which of the following:

- Concentration (i.e., mg/l) limits
- Mass (i.e., kg/day) limits
- Concentration *and* Mass limits
- Any of the above

Answer

D. Any of the above

What are some examples of how you might use concentration and mass limits together for a single parameter?

| | Monthly | Daily | |
|----------|----------------|----------------|--------------|
| | <u>Average</u> | <u>Maximum</u> | <u>Units</u> |
| Ammonia* | 500 | 600 | kg/day |

* However, no single sample shall ever exceed 40 mg/l on a weekday or 50 mg/l on a weekend.

Note 1: During normal plant operations, Monday through Friday, no single ammonia sample shall exceed 40 mg/L and no single TKN sample shall exceed 60 mg/L. However, during weekends, Saturday and Sunday, no single ammonia sample shall exceed 75 mg/L, no single TKN sample shall exceed 150 mg/L, and the average daily flow for Saturday and Sunday shall not exceed 0.5 MGD; however, should poultry processing production operations be required on Saturday and/or Sunday, the lower ammonia and TKN limits cited above for weekdays shall apply.

Furthermore, there shall always be an 8 hour minimum time lapse between the time that the high ammonia/TKN, low volume rendering wastewater is discharged, and the time that the low ammonia/TKN, high volume rendering plus poultry processing wastewater is discharged.

Does it matter whether mass limits are in mass (pounds or kg) per day, or mass per month?

It shouldn't matter to the Pretreatment Program Regulator, but it might matter to the industry.

For example:

5,420 lb/day

vs.

162,600 lb/mo.

May a Permit provide for specific deviations from permit limits?

A. Yes

B. No

Yes

For example:

The following pH fluctuations are allowed under this permit:

- The pH on an instantaneous basis may exceed 9.0, but may not exceed 10.0 for a period of no more than 15 minutes in a single day.
- The pH on an instantaneous basis may exceed 9.0, but may not exceed 11.0 for a period of no more than 5 minutes in a single day. This pH exception is limited to one pH excursion above 10.0 per month.

Is it ever acceptable and appropriate to include a non-enforceable testing requirement in a permit for the purpose of timely and enforceable **notifications** to the POTW of specific constituent concentrations that can directly impact the POTW's performance?

E.G., ammonia.

Note 3: The permittee shall test its effluent for ammonia using a Hach DR/870 Multiparameter Colorimeter (or other approved device) every four hours whenever wastewater is being discharged. Any effluent testing result in excess of the process control thresholds listed below, as determined by the Hach DR/870, shall be reported to the POTW (during normal working hours) or to the City's wastewater superintendent (during nights and weekends) within ten minutes of becoming aware of such an occurrence. All test results shall be recorded on a log (or datalog) which shall be submitted in hardcopy to the POTW with the DMR for the month being reported.

- During normal plant production periods Monday through Friday with less than 20% recycling: 35 mg/L.
- During normal plant production periods Monday through Friday with 20% or more recycling (recycling must be documented): 50 mg/L.
- During weekends (Saturday and Sunday): 60 mg/L.

IMPORTANTLY, THE INFORMATION OBTAINED FROM THE Hach DR/870 IS FOR PROCESS CONTROL ONLY AND WILL NOT GIVE RISE TO A PERMIT VIOLATION.

How frequently may a permit be reissued?

- A. Every 5 years
- B. Annually
- C. Semi-annually
- D. Monthly
- E. No limit



E. No limit

Under what circumstances would you reissue a permit on a very frequent basis (i.e., every month)?

How frequently may you require that any critical parameter(s) requiring a 24 hour composite sample be tested?

- A. Monthly
- B. Weekly
- C. Daily
- D. More frequent than daily

Daily

A permit may be used as an enforcement tool in place of which of the following traditional enforcement mechanisms?

- A. Consent or Administrative Order
- B. Compliance Order
- C. Cease and Desist Order
- D. All of the above



Answer: D, all of the above

How does this work?



Questions or Comments