

INDUSTRIAL PRETREATMENT PROGRAM

JACKSON COUNTY GEORGIA

ADMINISTERED BY THE
JACKSON COUNTY WATER AND SEWERAGE AUTHORITY (JCWSA)



Jackson County Water and Sewerage Authority

The reasons a Program is needed are:

- *It is the Authority's Best Opportunity to take Control of the Industries before they can cause any pollution.*
- *It will aid to preserve our Water Sources so that our children's children will have clean water.*
- *It will help insure that Jackson County will be an environmentally safe place to live.*

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Section 1

Introduction

This document has been prepared for implementation of the Jackson County Water and Sewerage Authority Industrial Pretreatment Program. The Industrial Pretreatment Program is a Federal mandate which requires municipalities and other providers of publicly-owned wastewater collection and treatment services to regulate industries that discharge to the public sewer system. This regulation of industrial discharges, codified in 40 CFR Part 403, is intended to serve three main purposes. These are:

1. To prevent the introduction of pollutants into publicly-owned treatment works (POTW) which will interfere with the operation of a POTW, including interference with its use or disposal of municipal sludge
2. To prevent the introduction of pollutants into POTWs which will pass through the treatment works or otherwise be incompatible with such works
3. To improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges.

The specific sections of this document are summarized below:

Section 1 - Introduction

Provides a general introduction to the Industrial Pretreatment Program. (this section)

Section 2 - Industrial User Information

Contains information obtained through an industrial user survey. Includes characterization of users.

Section 3 - Local Limits

Pretreatment regulations require that municipalities perform a technical analysis to determine if it is necessary to adopt discharge limitations that are more stringent or broader in scope than existing state and federal criteria. Utilizing analysis performed by the Authority, a set of local industrial limits for pollutants of concern were developed for the Authority's waste treatment facility which has an NPDES permitted discharge into the Middle Oconee River.

Section 4 - Enforcement Response Plan

The Authority has developed an enforcement response plan to regulate industries that violate the requirements of this pretreatment program. Examples of enforcement actions include: warning notices, administrative orders, fines, civil litigation, criminal prosecution and termination of sewer service. This section presents a formal enforcement response plan that will be implemented when taking enforcement action against a violator.

Section 5 - Program Implementation

This section includes proposed procedures to verify compliance by industrial users and program staffing requirements.

It should be emphasized that this is not a final document. The Pretreatment Program should be reviewed regularly and modified to accommodate growth and changes within the Authority's wastewater system. Technical review of local discharge limits must be undertaken every five years. Other aspects of the program should be modified to be made more effective as the Authority gains experience with management of the program. It should also be emphasized that the resources and manpower that the Authority must dedicate to the program will continue to increase as regulations get more stringent and Jackson County's industrial user base continues to grow.

Section 2

Industrial User Information

2.1 Industrial User Survey

A survey was undertaken to identify the industrial users of the Authority's POTW, known as the Middle Oconee Wastewater Treatment Plant (MOWWTP). As a first step, a questionnaire was hand delivered to each potential industrial user.

Information obtained through the questionnaires and on-site visits assisted in the development of the current industrial user permit.

2.1.2 Confidential Information

Information and data on a user obtained from reports, surveys, wastewater discharge permit applications, wastewater discharge permits, and monitoring programs, and from the designated Authority representative inspection and sampling activities, shall be available to the public without restriction, unless the user specifically requests, and is able to demonstrate to the satisfaction of the designated Authority representative, that the release of such information would divulge information, processes, or methods of production titled to protection as trade secrets under applicable State law. Any such request must be asserted at the time of submission of the information or data. When requested and demonstrated by the user furnishing a report that such information should be held confidential, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, but shall be made available immediately upon request to governmental agencies for uses related to the NPDES program or pretreatment program, and in enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics and other effluent data as defined by 40 CFR 2.302 will not be recognized as confidential information and will be available to the public without restriction. All confidential information will be stored in locked files at the Authority Offices and only authorized personnel of the Authority will have access to the files.

2.2 Characterization of Industrial Users

The criteria used to determine which industrial users are regulated under this program is included in 40 CFR 403.3(t):

- 1) Does user contribute >5% of the average dry weather hydraulic or organic capacity of the POTW?
- 2) Does user have a process discharge of >25,000 gallons per day?

- 3) Is user subject to categorical pretreatment standards?
- 4) Does user have a potential to inhibit or upset the POTW treatment plant processes?
- 5) Does user have a potential to cause a violation of the treatment plant's NPDES permit or water quality criteria?
- 6) Does user have a potential to limit sludge disposal options?
- 7) Does user have a reasonable potential to violate any pretreatment standards or requirements, including toxic pollutants (as defined by Section 307 of the Clean Water Act) in their discharge?

As described in Section 3 of this document, Pretreatment Standards will be applied to SIGNIFICANT INDUSTRIAL USERS by means of a permit and to all other INDUSTRIAL USERS by means of the Sewer Use Policy. Commercial users such as hospitals, dry cleaners, laboratories, auto body shops, etc. will be regulated by the Sewer Use Policy under the JCWSA Standard Specifications.

2.3 Industrial Waste Survey Update

The industrial waste survey will be updated at least annually to identify new industries and changes in existing users. New industries will be identified:

- through notification by the users
- through annual inspections, review of monitoring records and unannounced visits,
- by driving by the industrial parks to note new construction or changes in facilities, and
- by review of water records from the Authority for the last (12) months.

The Wastewater Operations Manager will work closely with the engineering consultant to identify industrial users that become subject to categorical standards, to classify industrial users as significant when needed, and to identify industrial users potentially subject to RCRA. EPA maintains schedules for promulgation of new categorical standards and these will be reviewed periodically in order to notify industrial users. Information will also be obtained by EPA's Internet web site and from the Water Environment Federation's publications *Water Environment and Technology and Industrial Wastewater*.

2.4 Slug Control Plans

At least once every two (2) years, the Authority staff shall evaluate whether each significant industrial user needs an accidental discharge/slug control plan. The staff's evaluation shall be included in the user's annual inspection report. After completing the evaluation, the Authority may require any user to develop, submit for approval, and implement such plan. Alternatively,

the Wastewater Operations Manager may develop such a plan for any user. An accidental discharge/slug control plan shall address, at a minimum, the following:

- Description of discharge practices, including non-routine batch discharges;
- Description of stored chemicals;
- Immediately notification of the Authority staff of any accidental or slug discharge; and
- Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.
- The ability of the Authority to require manholes to be installed to aid in the inspection, cleaning and repair of the interceptors and inspections for the Authority.

2.5 Public Notice Procedures

The Authority shall publish, in the legal organ of Jackson County, proposed revision of the Pretreatment Program or its adopting regulations at least thirty days prior to the revision or adoption.

The designated Authority representative shall publish annually, in the legal organ of Jackson County, a list of the users which, during the previous twelve (12) months, were in significant noncompliance shall mean:

- A. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six (66%) or more of wastewater measurements taken during a six (6) month period exceed the daily maximum limit or average limit for the same pollutant parameter by any amount;
- B. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six (6) month period equals or exceeds the product of the daily maximum limit or the average limit multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH);
- C. Any other discharge violation that the designated Authority representative believes has caused, alone or in combination with other discharges, interference or pass through, including endangering the health of POTW personnel or the general public;

- D. Any discharge of pollutants that have caused imminent endangerment to the public or to the environment, or has resulted in the designated Authority representative's exercise of its emergency authority to halt or prevent such a discharge;
- E. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;
- F. Failure to provide within thirty (30) days after the due date, and required reports, including baseline monitoring reports, reports on compliance with categorical pretreatment standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- G. Failure to accurately report noncompliance;
- H. Any other violation(s) which the designated Wastewater Operations Manager determines will adversely affect the operation or implementation of the local pretreatment program.

Table 2.1 Industries with categorical pretreatment standards.^a

Industry category	40 CFR part	Relevant SIC code(s) ^b	Pretreatment standards	
Aluminum forming	467	3353, 3354, 3355, 3357, 3363	ES ^c	NS ^d
Asbestos manufacturing	427	2621, 3292	C	NS ^e
Battery manufacturing	461	3691, 3692	ES	NS
Builders= paper and board mills	531	2621	ES	NS
Carbon black manufacturing	458	2895	C	NS
Cement manufacturing	411	3241	C	NS ^f
Coil coating can making	465	3479, 3492, 3411	ES	NS
Copper forming	468	3351, 3357, 3463	ES	NS
Dairy products processing	405	2021, 2022, 2023, 2024, 2026	C	NS ^g
Electrical and electronic components	469	3671, 3674, 3679	ES	NS
Electroplating	413	3471, 3672	ES	NS
Feedlots	412	0211, 0213, 0214	C	NS ^h
Ferroalloy manufacturing	424	3313	C	NS ⁱ
Fertilizer manufacturing	418	2873, 2874, 2875	C	NS
Fruits and vegetables processing	407	2033, 2034, 2035, 2037	C	NS ^j
Glass manufacturing	426	3211, 3221, 3296	C	NS ^k
Grain mills manufacturing	406	2041, 2043, 2044, 2045, 2046, 2047	C	NS ^l
Ink formulating	447	2893	C	NS
Inorganic chemicals	415	2812, 2813, 2816, 2819	ES	NS
Iron and steel manufacturing	420	3312, 3315, 3316, 3317, 3479	ES	NS
Leather tanning and finishing	425	3111	ES	NS

Table 2.1 Industries with categorical pretreatment standards.^a (continued)

Metal finishing	433	Industry groups: 34, 35, 36, 37, 38	ES	NS
Metal molding and casting (foundries)	464	3321, 3322, 3324, 3325, 3365, 3366, 3369	ES	NS
Nonferrous metals forming and metal powders	471	3356, 3357, 3363, 3497	ES	NS
Nonferrous metals manufacturing	421	2819, 3331, 3334, 3339, 3341	ES	NS
Organic chemicals, plastics, and synthetic fibers	414	2821, 2823, 2824, 2865, 2869	ES	NS ^m
Paint formulating	446	2851	C	NS ⁿ
Pesticide chemicals manufacturing formulation and packaging	455	2879	ES ^o C ^p	NS ^o C ^p
Petroleum refining	419	2911	ES	NS
Pharmaceuticals manufacturing	439	2833, 2834	ES ^q	NS ^q
Porcelain enameling	466	3431, 3631, 3632, 3633, 3639, 3469, 3479	ES	NS
Pulp, paper and paperboard	430	2611, 2621, 2631	ES ^r	NS ^r
Rubber manufacturing	428	2822	C	NS ^s
Soaps and detergents manufacturing	417	2841	C	NS ^t
Steam electric power generation	423	4911	ES	NS
Sugar processing	409	2061, 2062, 2063	C	NS ^u
Timber products processing	429	2491, 2493	ES	NS

^A Of the categories subject to pretreatment standards (Part 403, Appendix C), only categories with *numerical* pretreatment standards are shown. The other categories simply contain references to Part 128 (now deleted from 40CFR), Part 403 (the General Pretreatment Standards), or to removal credits (less stringent standard based on WWTP commitment to remove a specified percentage of incompatible pollutants). These stock passages offer no basis for setting numerical limits for specific pollutants in industrial user control mechanisms.

Table 2.1 Industries with categorical pretreatment standards.^a (continued)

- B Standard Industrial Classification. These codes were taken from the 1987 SIC Manual, which may be ordered as Publication No. PB 87-100012 from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, VA 22161.
- C Existing Sources (PSES).
- D New Sources (PSNS), new sources are regulated processes for which construction *started after* the date PSNS was proposed. See Part 122.2 for the distinction between a new source and a new discharger.
- E Subparts A (427.15), B (427.25), C (427.35), D (427.45), E (427.55), F (427.65), and G (427.75).
- F Subparts A (411.15), B (411.25), and C (411.35)
- G Subparts A(405.15), B(405.25), C(405.35), D(405.45), E(405.55), F(405.65), G(405.75), H(405.85), I(405.95), J(405.105), K(405.115), and L(405.125)
- H Subparts A (412.15) and B (412.15).
- I Subparts A (424.15), B (424.25), and C (424.35)
- J Subparts A (407.15), B (407.25), C (407.35), D (407.45), and E (407.55).
- K Subparts A (426.15), B (426.25), C (426.35), D (426.45), E (426.55), G (426.75), K (426.116), L (426.126), and M (426.136).
- L Subparts A (406.16), B (406.25), C (406.35), D (406.45), E (406.55), and F (406.65).
- M Revised PS scheduled for 1993. FR 57 at 19751 (May 7, 1992).
- N Subparts A (446.16).
- O Proposed in 1992. Final PS schedule for 1993. FR 57 at 19751
- P Scheduled to be proposed in 1994. FR57 at 19751.
- Q Revised PS scheduled for proposal in 1994. FR 57 at 19751
- R Revised PS scheduled for proposal in 1993. FR 57 at 19751
- S Subparts E (428.56), F (428.66), G (428.76), J (428.106), and K (428.116).
- T Subparts O (417.156), P (417.166), Q (417.176), and R (417.186).

Table 2.1 Industries with categorical pretreatment standards.^a (continued)

^U Subpart A (409.15)

Figure 2.1

[AUTHORITY LETTERHEAD]

Re: Industrial Pretreatment Program

Dear Industrial Customer,

Jackson County Water and Sewerage Authority is required by the Georgia Environmental Protection Division (EPD) to develop and implement an Industrial Pretreatment program. The Authority appreciates your cooperation in returning the Industrial Waste Questionnaire.

As part of the Pretreatment Program and as a follow up to the completed questionnaire returned by your office, the Authority must conduct a visit of your facility. The purpose of the visit is to help the Authority's Industrial Pretreatment personnel become more familiar with the processes utilized by the different industries that discharge wastewater into the Authority's sewer system.

We request that you have available at least one person qualified to offer a tour of the process used in manufacturing of your product. Also, please have available two copies of the following:

1. Material Safety Data Sheet for any and all materials utilized at your facility as raw material, component, cleaning agent, etc.
2. Flow diagram of manufacturing process showing specifically point of discharge of waste materials.
3. A map showing a plan view of the process units, floor drains, and storm drains, sewer manholes, sewer lines and a flow arrow for each line.

Any information considered confidential should be clearly labeled "Confidential" and be supported by a statement as to the reasons that such information should be considered confidential.

Sincerely,

Wastewater Operations Manager
JCWSA

Section 3

Local Discharge Limits

3.1 Wastewater System Background Data

Jackson County's Wastewater Pretreatment Program will be mandated by the Authority's NPDES Permit when it is revised. The Authority owns and operates one treatment facility with a discharge into the Middle Oconee River. The MOWWTP is an activated sludge plant with drying beds.

Table 3.1 provides pertinent data about the wastewater treatment facility.

Table 3.1
Local Limits for GA0002712 System

Parameter	Limit mg/L
Arsenic	.007
Cadmium	.2446
Chromium	183.093
Copper	.109
Cyanide	.4143
Lead	.116
Mercury	.045564
Molybdenum	.453417
Nickel	2.245743
Selenium	.5418
Silver	4.484
Zinc	1.822541
BOD ₅	250
TSS	250
Ammonia (N)	30

3.2 Background

The National Pretreatment Program was established to regulate the introduction of pollutants from non-domestic sources into Publicly Owned Treatment Works (POTW). Discharges targeted for regulation include those which will interfere with the operation of a POTW, including interference with its sludge digestion processes, sludge use or disposal; which will pass through the treatment works; or which are otherwise incompatible with such works. In addition, the program is intended to improve opportunities to reclaim municipal and industrial wastewaters and sludge (see 40 CFR 403.1 and 403.2). To accomplish these objectives, the National Pretreatment Program relies on a pollution control strategy with three elements:

1. National Categorical Standards

National technology-based standards developed by EPA Headquarters, setting industry-specific effluent limits.

2. Prohibited Discharge Standards:

+ General Prohibitions (403.5[a])

National prohibitions against pollutant discharges from any non-domestic user which cause pass-through or interference;

+ Specific Prohibitions (403.5[b])

National prohibitions against pollutant discharges from any non-domestic user causing: (1) fire or explosion hazard; (2) corrosive structural damage; (3) interference due to flow obstruction; (4) interference due to flow rate or concentration; and (5) interference due to heat.

3. Local Limits:

Enforceable local requirements developed by POTW to address Federal standards as well as State and local regulations.

The rationale behind this three-part strategy is first, that categorical standards provide nationally uniform effluent limits affording a technology-based degree of environmental protection for discharges from particular categories of industry. Second, the prohibited discharge standards recognize the site-specific nature of the problems they are intended to address at sewage treatment works and provide a broader baseline level of control that applies to all Industrial Users discharging to any POTW, whether or not the Industrial Users fall within particular industrial categories. Third, local limits are specific requirements developed and enforced by individual POTWs implementing the general and specific prohibitions, and also going beyond them as necessary to meet State and local regulations.

3.3 Pretreatment Regulations

EPA developed the General Pretreatment Regulations (40 CFR Part 403) to implement the requirements of Section 402. As discussed briefly earlier, the General Pretreatment Regulations establish general and specific prohibitions which are implemented through local limits. The regulations relating to each of these elements are set forth below:

- **A. General Prohibitions**

Section 403.5(a)(1) General prohibitions. A user may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference. These general prohibitions and the specific prohibitions in paragraph (B) of this section apply to each user introducing pollutants into a POTW whether or not the source is subject to other National Pretreatment Standards or any National, State or local Pretreatment Requirements.

- + **Definition of Pass Through**

The term “Pass Through” means a Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirements of the POTW’s NPDES permit (including an increase in the magnitude or duration of a violation). Section 403.3(n).

- + **Definition of Interference**

The term “Interference” means a discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- (1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and
- (2) Therefore is a cause of a violation of any requirement of the POTW’s NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with current statutory provisions and regulations or permits issued there under (or more stringent State or local regulations)

- **B. Specific Prohibitions**

In accordance with Section 403.5(b) the following pollutants shall not be introduced into a POTW:

- (1) Pollutants which create a fire or explosion hazard in the POTW;

- (2) Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such discharges;
- (3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;
- (4) Any pollutant, including oxygen demanding pollutants (BOD, Etc.) released in a discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW;
- (5) Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40°C (104°F) unless the EPD, upon request of the POTW, approves alternate temperature limits.

- **C. Implementation**

Section 403.5(c) of the General Pretreatment Regulations requires the implementation of the General and Specific Prohibitions through the local limits process under two specific circumstances:

- (1) POTW's with local pretreatment programs shall develop and enforce specific limits to implement the prohibitions listed in 403.5(a) and (b).
- (2) All other POTWs shall, in a case where pollutants contributed by User(s) result in Interference or Pass Through and such violation is likely to recur, develop and enforce specific effluent limits for Industrial User(s), and all other users, as appropriate, which together with appropriate changes in the POTW's Facilities or operation, are necessary to ensure renewed or continued compliance with the POTW's NPDES permit or sludge use or disposal practices.

3.4 Relationship of Local Limits to Categorical Standards

Categorical standards and local limits are distinct and complementary types of pretreatment standards. Promulgation of a categorical standard by EPA in no way relieves a municipality from its obligations to evaluate the need for, and to develop, local limits to meet the general and specific prohibitions in the General Pretreatment Regulation. As suggested earlier, categorical standards are developed to achieve a nationally-uniform degree of water pollution control for selected industries and pollutants. Local limits are intended to prevent site-specific plant and environmental problems resulting from any non-domestic user.

In many cases, POTWs may impose local limits which regulate categorical industries more stringently and/or for more pollutants than are regulated in the applicable categorical standard to afford additional plan or environmental protection. In this case, the local limit supersedes the

categorical standard as the applicable pretreatment standard. As a corollary, however, a less stringent local limit does not relieve a categorical industry from its obligation to meet the Federal standard. The central point to be remembered is that the existence of a Federal categorical standard should not deter a public sewer system from its obligation to evaluate discharges from all non-domestic users, to identify problem pollutants and to adopt more stringent technically-based local limits, where necessary.

With this understanding in mind, Table 3.2 highlights major differences between categorical standards and local limits. Generalizations that may be drawn from this table are that local limits are broader in scope, may be more diverse in form, and draw upon the POTW's discretion and judgment for development.

3.5 Overview of the Local Limits Process

An overview of the local limits development process is presented in Figure 3.1 Local limits development requires the use of site-specific data to identify pollutants of concern which might reasonably be expected to be discharged in quantities sufficient to cause plant or environmental problems. The process involves identifying pollutants of concern through characterizing industrial discharges, monitoring POTW's influent, effluent and sludge, reviewing pollutant effects on plant operations and reviewing environmental protection criteria.

Table 3.2
Comparison of Features Associated with
Categorical Standards and Local Limits

FEATURE	CATEGORICAL STANDARDS	LOCAL LIMITS
<u>Agency Responsible for Development</u>	EPA	POTWs (Control Authority)
<u>Potential Sources Regulated</u>	Industries specified in Clean Water Act (CWA), Georgia Water Quality Control Act, or by EPA	All non-domestic users as deemed necessary by Pretreatment Coordinator
<u>Objective</u>	Categorical Pretreatment Standards; Prohibition on Pass-Through or Interference; Baseline requirement	Local environmental and plant objectives; meeting applicable conditions and limitations
<u>Pollutants Regulated</u>	Primarily priority pollutants listed under Section 307 of CWA, although not limited to priority pollutants	All pollutants - priority or non-priority
<u>Basis</u>	Technology (BAT or NSPS) or Management Practice (e.g., solvent management plan)	Any technically-based method including: Allowable headwork's loading method Toxicity reduction evaluation Technology-based Management practice
<u>Applicability</u>	Apply to particular regulated waste streams within certain industrial subcategories	Apply to all nondomestic users either uniformly or case-by-case
<u>Type of Limit</u>	Sewer: production-based or concentration-based numerical limits, discharge prohibition, or management practice plan requirements	Sewer: production-based or concentration based numerical limits, discharge prohibition, or management practice plan requirements
<u>Point of Application</u>	Usually end of regulated process	Usually at point of discharge to collection system

Once the pollutants of concern and the sources discharging them have been identified, it is necessary to then select the most effective technical approach for limits development. As is shown in Figure 3.1 several methods are available depending on the nature of the potential problem. Each approach is described briefly below:

Figure 3.1

Overview of the local Limits Process

Review Plant Operations and Environmental Criteria To Determine the Need for Local Limits	
<ul style="list-style-type: none">• Compare POTW removal efficiency, effluent and sludge values with permit limits, sludge quality criteria and other applicable requirements• Compare influent values with actual and/or literature data on threshold inhibition levels to the biological processes• Build in safety factor to allow for growth• Screen pollutants for local limits technical analysis	

Determine the Sources, Character and Volume of IU Pollutant Contributions to POTW	
<ul style="list-style-type: none">• Conduct / review industrial survey data• Perform IU discharge and POTW collection system sampling• Perform influent, effluent and sludge sampling / analysis• Review IU monitoring reports• Review new IU permit applications	

Select and Implement Technical Approach for Limits Development	
<ul style="list-style-type: none"> • Perform allowable headworks loading analysis or/and; • Perform collection system analysis or/and; • Evaluate industrial user management practices or/and; • Develop case-by-case permit limit 	

Allowable Headwork's Loading Method

In this procedure, a POTW converts environmental and plant protection criteria into maximum allowable headwork loadings that, if received, would still enable the POTW to meet environmental limits and avoid plant interference. Allowable headwork loadings are calculated by the POTW on a pollutant-by-pollutant basis for each plant process and environmental objective relevant to the POTW. For example, the maximum amount of zinc which can safely be received by the plant without inhibiting sludge digestion is calculated, as well as the maximum zinc load which would allow for compliance with the POTW's NPDES permit limits. This procedure is performed for each criterion and resulting loadings are compared. The lowest value (mass loading) for each pollutant is identified and serves as the basis for identifying the need for a local limit. If the allowable headwork loading for the particular pollutant is well above that loading currently received by a POTW, a local limit may not be necessary. However, if POTW influent loadings approach or exceed the allowable headwork loading, the need for a limit will have to be established.

Collection System Approach

Using this approach, a POTW can identify pollutants which may cause air releases, explosive conditions, or otherwise endanger worker health and safety. These pollutants can then be controlled by numeric local limits and/or industrial user management practice plans. This approach requires system sampling and analysis to identify pollutants present in the collection system. Pollutants detected in the collection system are evaluated to determine their propensity to change from a liquid phase to a gaseous phase. This screening evaluation is performed using the Henry's Law Constant for each pollutant, a measure of the compound's equilibrium in water. For those pollutants shown to volatilize, comparisons are then made with worker health exposure criteria, threshold limiting values (TLVs), and lower explosive limits (LELs) (the minimum concentration in air which will combust or explode). Where threshold limiting values or lower explosive limits are predicted to be exceeded as a result of a pollutant discharge, the need for further monitoring to confirm the problem and, if appropriate, a local limit or management practice plan is indicated. The use of flashpoint limits (the minimum temperature at which the combustion of a compound will propagate

away from an ignition source) to prevent the discharge of ignitable wastes is also recommended.

Industrial User Management Practice Plans

This approach embodies several methods a POTW may use to reduce industrial user pollutant discharges by requiring industrial users to develop management practice plans for handling of chemicals and wastes. The methods available are particularly effective for control of episodic or highly variable discharges such as spills, and batch and slug discharges. To accomplish this approach, a POTW takes steps to understand an industrial user's operations by monitoring discharges, inspecting facilities, and reviewing industrial user (IU) reports. Depending on the nature of the discharge problem, the POTW then requires the industrial user to develop and implement a management plan as an enforceable pretreatment requirement to reduce or eliminate the impacts associated with the discharge. Appropriate management plans may address spill prevention and containment, chemical management practices (e.g., chemical substitution, recycling, and chemical segregation) and best management practices addressing housekeeping practices. A management practice plan requirement can be viewed as a type of narrative local limit. POTWs may include numerical local limits as a part of, or in addition to, industrial user management practices to enhance their effectiveness.

Case-by-Case Permitting

In this approach a POTW sets numeric local limits based on removals which can be achieved with available technology(ies) which are known to be economically affordable. POTW engineers establish specific limits based on their best professional judgment making use of data on removal efficiencies and economic achievability for pollution control from comparable industries/discharges. This approach is particularly suitable where effects data for specific pollutants is not sufficient to use other approaches, but where a degree of control is indicated as a result of observable effects (e.g., toxicity testing, fish kills, plant inhibition, etc.)

Some of these approaches are suited to specific problems and pollutants (e.g., pass-through is best addressed by the allowable headwork's loading method). Others can be used in conjunction with each other (e.g., allowable headwork's loading method with industrial user management practices). The technical approach used by a POTW to develop local limits is principally a local decision, provided that the resulting limits are enforceable and scientifically-based.

3.6 Updating Local Limits

Local limits development is not a one-time event. Local limits should be periodically reviewed and revised as necessary to respond to changes in Federal or State regulations, environmental protection criteria, plant design and operational criteria, and the nature of industrial contributions to the POTW influent. The extent that a POTW can anticipate changes and develop

appropriately protective local limits, the need to revise a particular local limit in the future may be reduced. For example, if a POTW knows or can anticipate that economic growth is occurring in its service area, it should factor in a growth margin so that all of the allowable headworks loading is not used up by existing industrial users. Otherwise, additional industrial hook-ups would be prohibited and/or local limits would have to be modified.

Similarly, if a POTW anticipates changing its sludge disposal practices in the near future, the POTW should develop local limits now which are protective of any more restrictive sludge use. By use of foresight, POTWs can extend the validity of their local limits to the projected term of an industrial user's permit (typically one to five years). Effective planning will eliminate frequent local limits modifications which may tax resources and weaken industrial user compliance efforts.

The Authority, will as appropriate, evaluate the need to update local limits when there are changes in: (1) the limiting criteria on which local limits are based, and/or (2) the flow rate and characteristics of industrial contributions (including connection of additional industrial users). Examples of potential changes that would affect criteria used in deriving local limits include:

- Changes in WWTP permit limits to include additional or more restrictive toxic pollutant limits, including organic pollutants;
- Changes in water quality limits including toxicity requirements;
- Changes in sludge disposal standards or POTW disposal methods;
- Modifications to the treatment plant, causing changes in the process removal efficiencies and tolerance to inhibition from pollutants;
- Availability of additional site-specific data pertaining to pollutant removal efficiencies and/or process inhibition.

Potential changes in industrial contribution include:

- Connection to the POTW of new industrial users;
- Addition of new processes at existing industrial users;
- Shutdown of industrial users or discontinuation of process discharges;
- Changes to existing industrial user processes, including chemical substitutions, expected to alter pollutant characteristics and loadings to the POTW;
- Alteration of pretreatment operations.

The industrial user survey should be reviewed periodically to determine if any of the above factors have substantially changed. Upon conducting such a review, the Authority should update its existing local limits as necessary and/or develop new local limits to cover additional

pollutants. Any such changes in local limits are considered to be a modification of the Pretreatment Program, and as such need to be submitted to EPD for approval.

3.7 Ongoing Monitoring Program

Critical to successful development and updating of local limits is the existence of comprehensive data on industrial user discharges, conditions in the collection system, and characteristics of the POTW's influent, effluent, and sludge. An adequate monitoring program is essential. By identifying additional requirements early and phasing in supplemental improvements, the Authority will have sufficient data to update and revise local limits as changes dictate.

3.8 Identifying Sources and Pollutants of Concern

Activities conducted for the development of local limits consist of identifying areas of concern, gathering requisite data on the sources and pollutants of concern, and calculating local limits. The following steps are involved:

Step 1

Identify the concerns to be addressed through local limits development in order to meet Federal, State and Local requirements;

Step 2

Identify the sources and pollutants which should be limited in order to address those concerns as follows:

- Characterizing industrial discharges
- Review of applicable environmental protection criteria and pollutant effects data
- Monitoring of Industrial User discharges, POTW collection system and treatment plant.

Step 3

Calculate local limits for the identified pollutants of concern.

3.9 Concerns to Be Addressed

A POTW's local limits must, at a minimum, be based on meeting the statutory and regulatory requirements as expressed in the Clean Water Act and General Pretreatment Regulations and any applicable State and Local requirements. The types of concerns that a POTW is likely to be required to address as a result of Federal, State or local requirements include the following:

- Water quality protection
- Sludge quality protection
- Operational problems

- Worker health and safety
- Air emissions

The following discusses each of these concerns in some detail:

➤ **Water Quality Protection**

POTWs with surface water discharges are required to prohibit Industrial User discharges in amounts that result in violation of water quality-based NPDES permit limits. These permit limits are often based on specific water quality standards and are generally expressed as numeric standards. In many cases, these standards include limitations on substances (such as metals) that may be toxic to aquatic life. Local limits, will as necessary, be developed and implemented.

➤ **Sludge Protection**

POTWs are required to prohibit Industrial User discharges in amounts that cause violations of applicable sludge disposal, regulations, or restrict the POTW from using its chosen sludge disposal or use option. When Industrial User discharges render sludge unsuitable for land application and necessitate landfill disposal, incineration, or additional treatment of sludges, the POTW not only must pay the costs of additional treatment, but may lose the revenue obtained from selling sludge. This is considered interference.

POTWs that normally dispose of sludge through landfill disposal or incineration may also be adversely affected by certain Industrial User discharges and should develop local limits that assure their method of sludge disposal will not be restricted. Sludges disposed of by landfill should be tested for toxicity and if it should exceed allowable toxicity concentrations this may result in the need to dispose of the sludge in a hazardous waste landfill. The costs of disposal in such landfills greatly exceed that of disposal in normal solid waste landfills.

A POTW has a number of options to dispose of sewage sludge, including applying it to land, incineration, disposing of it in a landfill, or selling it to the public for use as a fertilizer or soil nutrient. However, the composition of the sludge can limit these choices.

EPA has promoted policies (i.e., the 1984 Beneficial Reuse Policy and the 1991 Interagency Policy on Beneficial Use of Sewage Sludge) strongly supporting the beneficial reuse of sewage sludge. The term biosolids has been used to distinguish sewage sludge that has been treated and can be beneficially recycled. The organic and nutrient content of biosolids makes it a valuable resource to use in improving marginal lands and as a supplement to fertilizers and soil

conditioners. Land application of biosolids is a growing trend for the disposal of sewage sludge. In some cases the biosolids are even sold to the public for use as soil conditioners. The sale of sewage sludge products can be used to defray the costs of de-watering and composting the sludge.

The Authority currently land applies Class B biosolids and sends them to a landfill during inclement weather as determined by 40 CFR 503. Therefore, sludge criteria used to develop loading limits for sludge protection was selected as Class B with loading rate restrictions. This criterion allows for sludge to be land applied provided specific record keeping and application limits are met.

➤ **Operational Problems**

Receipt of some industrial wastes may interfere with POTW operations, resulting in a violation of permit conditions calling for specific removal efficiencies to be achieved and for the plant to be well-operated and maintained. Moreover, some discharges of pollutants, while not causing permit violations or violations of sludge disposal regulations, can nevertheless disrupt POTW operations, increase POTW operation and maintenance costs, and may cause violations of specific prohibitions. For example, industrial user discharges that inhibit the POTW's biological treatment systems result in reduced POTW efficiency and, as a result, increased operating costs. At worst, process inhibition may necessitate reseeded and stabilization of the treatment unit. In addition, process inhibition or upset may result in the production of sludges that require either special treatment before disposal, or disposal in a manner not generally practiced by the POTW. This would be considered interference. In many cases it is necessary to develop local limits to resolve these problems.

➤ **Worker Health and Safety**

Flammable/explosive and/or fume toxic pollutants discharges to POTWs can pose a threat to the health and safety of POTW workers. Local limits can be used to regulate the discharge of flammable/explosive and/or fume toxic pollutants. POTW workers may be susceptible to the inhalation of toxic gases that form or accumulate in collection systems. The vapors of volatile organic compounds (VOCs) are of major concern since they may be both toxic and carcinogenic, and may produce acute and chronic health effects over various periods of exposure. Also of concern are the hazards associated with the toxic gases produced when certain inorganic discharges mix in the collection system. Acidic discharges, when combined with certain nonvolatile substances such as sulfide and cyanide, can produce toxic gases/vapors that are hazardous to humans (e.g., hydrogen sulfide and hydrogen cyanide gases).

In response to the potential hazards to human health associated with toxic vapors POTWs may establish local limits based on the maximum recommended VOC levels in air. Explosion and fire hazards comprise an additional health and safety concern for POTW workers. Accumulation of volatile substances in the treatment works can produce an influent that ignites or explodes under the proper

conditions, potentially injuring POTW workers. Fire and explosion hazards are regulated under the specific prohibitions of 40 CFR 403.5(b). Development of local limits for those pollutants which pose fire or explosion hazards to POTWs may be used to supplement the specific prohibitions.

➤ **Air Emissions**

The General Pretreatment Regulations do not require the adoption of local limits to protect air quality unless there are air quality standards associated with the POTW sludge use or disposal practice. However, POTWs may choose to adopt local limits for this purpose, or may be required to do so by the State. This does not appear necessary for the Authority at this time.

3.10 Evaluation of Jackson County's Need to Establish Local Limits

The procedures described above in this section have been used to evaluate the Authority's need to set local limits as part of the pretreatment program. The following steps were taken in evaluating the need for local limits:

1. Sampling results on the treatment plant influent, effluent and sludge were assembled and evaluated.
2. Self monitoring reports submitted to EPD from permitted industrial users were assembled and evaluated.
3. An Allowable Headworks Loading Analysis was performed based on the following treatment plant / environmental criteria:
 - Receiving stream water quality standards
 - Activated sludge inhibition data
 - Sludge Disposal Criteria

3.11 Local Headwork's Limits

Maximum allowable headworks loadings (MAHLs) are the upper limit of pollutant loading at which a POTW will not violate any applicable criteria. MAHLs are the basis for local limits. IN accordance with EPA's *Local Limits Development Guidance*, (Draft Aug. 2001), MAHLs are established by:

- Calculating wastewater treatment facility removal efficiencies for each pollutant of concern.
- Calculating allowable headworks loadings (AHLs) for each environmental criterion.
- Designating as the MAHL the most stringent AHL for each pollutant of concern.

Following this approach the Authority has established the following local limits:

Arsenic: Below Detectable Level
Cadmium: Below Detectable Level
Chromium: Below Detectable Level
Copper: Below Detectable Level
Cyanide: Below Detectable Level
Lead: Below Detectable Level
Molybdenum: Below Detectable Level
Mercury: Below Detectable Level
Nickel: Below Detectable Level
Selenium: Below Detectable Level
Silver: Below Detectable Level
Zinc: Below Detectable Level
Biochemical Oxygen Demand (5-Day) : ≤ 215 mg/L
Total Suspended Solids: ≤ 215 mg/L
NH₃-N: ≤ 20 mg/L
TKN: ≤ 32 mg/L
Total Phosphorus: 7 mg/L
Total Chlorine Residual: ≤ 0.3 mg/L

3.12 Allocation of Allowable Loadings

The MAHLs calculated in Section 3.11 present maximum combined loadings that can be received at the POTW's headworks from all sources. Since only some of these sources are controllable, the calculation of MAHLs is intended to regulate the discharge from only those controllable sources, while accounting for the contribution from the uncontrollable sources.

With respect to mass, or loading based pollutants, the Authority has experienced only potential problems with respect to total phosphorus. The Authority has determined the following allocation of total phosphorus to be appropriate:

Total Phosphorus: 50 mg/L. (an average loading rate for phosphorus is 7 mg/L with a high loading rate of 12 mg/L).

$0.300 \text{ mgd} \times 12 \text{ mg/L} \times 8.34 = 30 \text{ lb/day}$ of total phosphorus (maximum loading from all sources)

$0.270 \text{ mgd} \times 8.34 \times 7 \text{ mg/L} = 15.7 \text{ lbs/day}$ of total phosphorus. (loading attributed to non-industrial flow)

14.3 lbs/day from Industry = $0.03 \text{ mgd} \times 8.34 \times A = 57 \text{ lbs/day}$ maximum loading from industry.

The Authority will place a limit of 50 lbs/day of total phosphorus for Industrial Users. The current industrial flow is approximately 0.02 mgd. Limitations on loading (mass) will be allocated as a factor of flow in case specific permitting decisions.

References

1. Novotany, V. Urban Diffuse Pollution: Sources and Abatement. *Water Environment and Technology* (Dec. 1991)
2. *Local Limits Development Guidance* U.S. Environmental Protection Agency - Office of Wastewater Management 4203 (EPA 833-R-04-002A, July 2004).

Section 4

Enforcement Response Plan

4.1 Background

The purpose of this section is to present a plan for enforcement actions to deal with Industrial User noncompliance. It is the responsibility of the Authority, under Federal regulations, to identify all violations, to respond with appropriate action and to follow up those violations with escalated levels of enforcement, if needed, to ensure compliance.

4.2 Overview of Enforcement Actions

The Authority begins its enforcement process by identifying an industrial user's violation. Once a violation is identified, the Authority must determine whether the violation should be considered significant or non-significant. Significant noncompliance (SNC) is defined in 40 CFR 403.8 as a violation that meets one or more of the following criteria:

- (a) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;
- (b) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of all of the measurements taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);
- (c) Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Authority determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);
- (d) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge;
- (e) Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;
- (f) Failure to provide, within thirty days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical pretreatment standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;

- (g) Failure to accurately report noncompliance; or
- (h) Any other violation(s) which the Authority determines will adversely affect the operation or implementation of the local pretreatment program.

The six-month period stated under criteria (a) and (b) above may be taken as a rolling six-month time frame which equals the current day minus six months.

If the violation is significant, the Authority must determine the most appropriate response. This response should be proportionate to the violation's severity, promote compliance in a timely manner, and be authorized under State law and the Authority's sewer use ordinance or regulations.

This section provides an overview of six types of enforcement responses. Which response, or combination of responses to use depends on the violation's severity, its duration, its effect on the environment and the treatment plant, and the user's compliance history as well as its good faith in taking correction action. The six enforcement responses described in this section are:

- Notice of violation
- Administrative fines
- Administrative orders
- Civil litigation
- Criminal prosecution
- Termination of sewer service

4.3 Notice of Violation

The most common form of a Notice of Violation (NOV) is an official communication from the Authority to the noncompliant industrial user which informs the user that a pretreatment violation has occurred. The NOV is an appropriate initial response to non-significant violations. In case of significant noncompliance, a NOV may also be issued prior to issuing an administrative order or pursuing judicial remedies. The purpose of the NOV is to notify the industrial user of the violation(s); it may be the only response necessary in cases of infrequent and generally minor violations. The NOV can be used as a vehicle to assess administrative fines or to impose compliance schedules but for purposes of this discussion the NOV is defined in its basic function: to inform industrial users that a pretreatment violation has taken place. If the user does not return to compliance following receipt of the NOV, the Authority should proceed to more stringent enforcement measures.

When to Issue NOVs

The NOV is issued for relatively minor or infrequent violations of pretreatment standards and requirements. Although it may lack the deterrent effect of an administrative fine or criminal indictment, a NOV can nevertheless be an effective response for several reasons. First, the NOV provides the industrial user with an opportunity to correct noncompliance on its own initiative rather than according to a schedule of actions determined by the Authority and thus fosters a cooperative environment between the industrial user and the Authority. Second, the NOV documents the initial attempts of the Authority to resolve the noncompliance. Should circumstances require the Authority to subsequently take a more stringent approach, the NOV

establishes that the Authority escalates its response according to its enforcement response plan, rather than reacting to the noncompliance with arbitrary or unnecessarily harsh enforcement. Finally, by providing the Authority with an inexpensive

and prompt response to violations, the NOV demonstrates to the regulated community the viability of the Authority's enforcement program.

Table 4-1 details several instances where the issuance of a NOV is considered an appropriate enforcement response. While this list is not all-inclusive, it indicates the categories of violation which are properly addressed by NOVs.

How to Issue NOVs

Since NOVs are official communications, they should be issued on Authority letterhead. A NOV may take the form of a letter to the industrial user or a preprinted form with the particular offense(s) written (or typed) in the blanks provided.

Typically, a more detailed NOV contains the following minimum findings of fact:

- The Authority is charged with constructing, maintaining, and regulating the use of the sewer system and treatment works.
- To protect the sewer system and treatment works, the Authority administers a pretreatment program
- Under this program, the industrial user was issued a permit
- The permit contained numerical limits on the quantity of pollutants which the industry could discharge as well as self-monitoring requirements and other duties
- On (date), pollutant analysis showed that the quantity of (pollutant) exceeded the permit limitation, etc.

A sample NOV appears as Figure 4-1.

Recommendation of NOV Issuance

For maximum effectiveness, the NOV should be written and delivered to the user within 15 days upon detection of the violation. The NOV should either be hand-delivered to the industrial user by Authority personnel or be sent to the industrial user via certified mail.

Authenticated copies of NOVs may serve as evidence in judicial proceedings. Therefore, a copy of each NOV, signed by the responsible Authority official, should be placed in the industrial user's file, along with the certified mail receipt or similar statement by the person who delivered it. In addition, the Authority Manager should be informed of the NOV issuance. If the Authority begins to use an automated compliance tracking system, issuance of the NOV should be entered into the system. These actions will facilitate closer monitoring of the noncompliant user's corrective actions and self-monitoring reports. Many public sewer systems schedule routine inspection and sampling visits to focus on facilities which have recently received NOVs.

If the user does not return to compliance, the Authority should escalate to more stringent enforcement responses rather than repeatedly issuing NOVs which do not result in a return to compliance.

Violations Which May Be Addressed by a Notice of Violation	
1.	Unpermitted Discharges
<input type="checkbox"/>	Failing to file permit renewal application but continuing to comply with expired permit
<input type="checkbox"/>	Reported spill with no known adverse effects
2.	Effluent Limit Violations
<input type="checkbox"/>	Isolated, insignificant exceedance
3.	Monitoring and Reporting Violations
<input type="checkbox"/>	Inadvertently using incorrect sample collection procedures
<input type="checkbox"/>	Failing to submit more frequent self-monitoring information
<input type="checkbox"/>	Failing to properly sign or certify monitoring reports
<input type="checkbox"/>	Failing to notify of slug load, which has no known adverse effects
<input type="checkbox"/>	Filing late report, including compliance schedule reports (less than 30)
4.	Missed Compliance Schedule Deadlines
<input type="checkbox"/>	Missing interim or final deadline by 90 days or less

Figure 4-1
Example Notice of Violation
Jackson County Water and Sewerage Authority

INDUSTRIAL PRETREATMENT PROGRAM

IN THE MATTER OF

[NAME OF INDUSTRY]
[ADDRESS]

NOTICE OF VIOLATION

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the Authority. This order is based on findings of violation of the conditions of the wastewater discharge permit.

FINDINGS

1. The Jackson County Water and Sewerage Authority is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, the Authority administers the pretreatment program.
3. Under this pretreatment program, [Name of Industry] was issued a discharge permit.
4. The discharge permit issued to [Name of Industry] contained numerical limits on the quantity of pollutants which [Name of Industry] could discharge and self monitoring requirements.
5. On [Date], pollutant analysis revealed that the quantity of [pollutant] exceeded the permit limitation.

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS, [NAME OF INDUSTRY] IS HEREBY NOTIFIED THAT:

- It is in violation of its discharge permit.
- It is required to immediately implement corrective actions and submit to the Authority within 30 days of this notice a description of corrective actions taken.

Signed: _____
Authority Manager

4.4 Administrative Fines

An administrative fine is a monetary penalty assessed by the Authority for violations of pretreatment standards and requirements. Administrative fines are among the most effective responses to user noncompliance because they may be assessed at the discretion and the fine amount may be determined on an individual basis. Administrative fines differ from civil penalties (penalties imposed through court proceedings), since fines are assessed by the Authority directly and do not require court intervention unless the user contests the action or refuses to pay the fine. Administrative fines are punitive in nature and are not related to a specific cost borne by the Authority. Instead, fines are to recapture the full or partial economic benefit of noncompliance, and to deter future violations.

When to Assess Administrative Fines

Administrative fines should be used as an escalated enforcement response, particularly when the NOV's or administrative orders have not prompted a return to compliance. Whether administrative fines are appropriate responses to noncompliance also depends greatly on the circumstances surrounding the violation. When using this enforcement response, either singly or in conjunction with another response (e.g., an administrative order requiring the industrial user to take steps to return to compliance), the Authority should consider the following factors:

- The type and severity of the violation
- The number of violations cited
- The duration of the noncompliance
- The impact of the violation on the wastewater treatment plan and the environment (e.g., whether the violation caused pass through or interference)
- Whether the violation threatened human health
- Whether the industrial user derived any economic benefit or savings from the noncompliance
- The compliance history of the user
- Whether the user is making good faith efforts to restore compliance
- Other policy considerations normally involved in an enforcement decision.

Suggestions for instances when fines are particularly appropriate include:

- When the industrial user remains in noncompliance after receiving repeated NOV's
- When the industrial user violates the terms of an administrative order (such as failing to meet a compliance schedule deadline).

How to Assess Administrative fines

The process of assessing administrative fines involves three steps: (1) determining the amount of the fine; (2) selecting a mechanism through which to impose the fine; and (3) collecting the fine. To successfully assess administrative fines, the Authority must have adequate legal authority, well-defined procedures, and complete documentation of the noncompliance (such as chain-of-custody forms and detailed sampling records). If the industrial user challenges the fine in court, the Authority must be prepared to defend its actions.

Determining the Amount of the Fine

The amount of the fine should be proportionate to the economic benefit enjoyed by the industrial user from the noncompliance and the harm caused by the violation. Two primary methods exist for determining fine amounts: assessing on a case-by-case basis (based upon well-defined criteria) and following a schedule of fines (also based upon well-defined criteria). While each method has advantages, it is best to adopt one of the two approaches rather than attempting to combine elements of each.

Determining the amount of the fine on a case-by-case basis is more flexible and may ultimately allow for broader consideration of appropriate fine amounts than adherence to a predetermined fine schedule. However, unless this amount is based on previously determined criteria, the Authority may not be able to justify its decision and is therefore more vulnerable to user charges of arbitrary or selective enforcement. If the Authority develops and uses a predetermined fine schedule, its response will be prompt and unlikely to be challenged (unless the fine amount was inconsistent with the schedule or the schedule amounts were used in setting fines for some users and disregarded for others).

Developing a Fine Schedule

Public sewer systems have used several varieties of fine schedules ranging from a flat rate for any violation to a sliding scale based on the type and nature of noncompliance. A recommended schedule of fines is presented below.

Determining a fine amount which reflects the violation's significance is extremely important. If a fine is too small, its deterrent value is lost and the amount may be regarded by the user as a tax or nominal charge to pollute. If the fine is too great, it is more likely to be contested and could bankrupt the industry (making necessary investments in pretreatment equipment impossible and potentially forcing unnecessary closure). In cases of extreme hardship, the Authority may consider reducing or suspending the fine as part of a consent order or a show cause proceeding.

Methods of Assessing Administrative Fines

Once the violation is documented and an appropriate fine amount determined, the Authority must notify the industrial user of the fine assessed and collect the fine. A variety of mechanisms may be used to assess administrative fines.

Assessment on Sewer Bill: The Authority assesses the administrative fine and includes it in the sewer bill to the industrial user. The Authority identifies the charge as a fine for noncompliance and also includes a comment indicating that if compliance is not achieved in thirty days, an escalated enforcement action will be taken against the industrial user.

Notice of Violation: A NOV is used to notify the industrial user of its pretreatment violation(s) and to inform the user that a fine has been assessed. The Notice should include a provision explaining that full payment is due to the Authority within a specified period of time.

Administrative Order: A formal order is issued by the Authority specifying that the industrial user is in noncompliance and outlining actions which are required of the industrial user including the payment of an administrative fine.

Show Cause Hearing: A formal or informal meeting between the noncompliant industry and the Authority. One outcome of this meeting may be the assessment of an administrative fine. In some cases, a show cause hearing is granted to give the industrial user an opportunity to appeal the fine.

Jackson County, Georgia
Schedule of Penalties Assessed Against Industrial User for Violations of the Sewer Use Ordinance in Agreed Orders

PENALTIES ASSESSED PER DAY OF VIOLATION

Nature of violation	Before notice of violation compliance date	After notice of violation compliance date (through conclusion of administrative hearing)	Before order compliance date (from conclusion of administrative order compliance date)	After administrative order compliance date ^a
Effluent limitations - violation of applicable daily maximum limit or average limit ^b				
0% to 50% above limit, pH below 5.0 or greater than 10.0	\$100.00	\$200.00	\$400.00	\$1,000.00
50% to 75% above limit, pH below 4.5 or greater than 10.5	\$200.00	\$400.00	\$800.00	\$2,000.00
75% to 100% above limit, pH below 4.0 or greater than 11.0	\$300.00	\$600.00	\$1,200.00	\$3,000.00
More than 100% above limit, pH below 3.5 or greater than 11.5	\$500.00	\$1,000.00	\$2,000.00	\$5,000.00
Reporting requirements - any provision	None	\$100.00	\$200.00	\$1,000.00
Other requirements of ordinance - any provision	\$100.00	\$200.00	\$500.00	\$1,000.00

^A The above penalties reflect fines to be assessed in stipulated agreements (consent orders). In all matters requiring a contested hearing, the Jackson County Water and Sewerage Authority will seek fines in excess of at least twice the above stipulated amounts, to the allowable statutory maximum.

^B For effluent violations, assessed penalty for any day is determined by maximum degree of noncompliance of any parameter in noncompliance.

4.5 Administrative Orders

Administrative Orders (AOs) are enforcement documents which direct industrial users to undertake or to cease specified activities. The terms of Administrative Orders may or may not be negotiated with industrial users. Administrative orders are recommended as the first formal response to significant noncompliance (unless judicial proceedings are more appropriate), and may incorporate compliance schedules, administrative penalties, and termination of service orders. This section focuses on four common types of administrative orders;

- Cease and desist orders
- Consent orders
- Show cause orders
- Compliance orders

Examples of each type of Administrative Order appear at the end of this section.

Common Elements of Administrative Orders

The following elements are common to all Administrative Orders:

Title: The title should specify the type of order being issued, to whom it is being issued, summarize the purpose(s) of the order, contain an identification number, and be printed on the letterhead of the Authority.

Legal authority: The authority under which the order is issued, i.e., its enabling legislation and/or sewer use ordinance (with complete citations to State law and ordinance provisions) should be provided.

Finding of noncompliance: All violations must be carefully described, including the date(s), the specific permit conditions/ordinance provisions violated, and any damages attributable to the violation.

Ordered activity: All orders should clearly set out all ordered activity including installation of treatment technology, additional monitoring, appearance at a show cause hearing, etc.

Milestone dates for corrective actions: Where compliance schedules are used, all progress or milestone dates must be clearly established, including due dates for any required written reports.

Standard clauses : Clause(s) which provide that: (1) compliance with the terms and conditions of the AO will not be construed to relieve the user of its obligation to comply with applicable Federal, State or local law; (2) violation of the AO itself may subject the user to all penalties available under the sewer use ordinance; (3) no provision of the order will be construed to limit the Authority's ability to issue supplementary or additional orders or take other action deemed necessary to implement its pretreatment program; and (4) the provisions of the order shall be binding upon the user, its officers, directors,

agents, employees, successors, assigns, and all person, firms, and corporations acting under, through, or on behalf of the user.

Types of Administrative Orders

The circumstances of industrial noncompliance frequently dictates the type of order needed to achieve an early return to compliance; no single type of AO is appropriate for all situations, and even when a particular order is the best choice, there are potential disadvantages which the Authority should consider before issuing it. In fact, the Authority may use more than one type of order when responding to a particular instance of noncompliance. For example, an industrial user who discharges a slug load may be issued an order which requires the industrial user to cease and desist (to immediately halt the unauthorized discharge) and to show cause (i.e., to appear before the Authority and explain why more sever enforcement actions should not be taken).

Cease and Desist Orders

A cease and desist order directs a noncompliant user to cease illegal or authorized discharges immediately or to terminate its discharge altogether. A cease and desist order should be used in situations where the discharge could cause interference or pass through, or otherwise create an emergency situation. The order may be issued immediately upon discovery of the problem or following a hearing. In an emergency, the order to cease and desist may be given by telephone. However, a subsequent written order should be served on the industrial user, either in person or by registered mail. If necessary (and within its legal authority), the Authority may order immediate cessation of any discharge to its collection system, regardless of a user's compliance status. In nonemergency situations, the cease and desist order may be used to suspend or permanently revoke industrial wastewater discharge permits. If the user fails to comply with the order, the Authority may take independent action to halt the discharge, such as terminating water service or blocking the user's connection point.

Advantage of the Cease and Desist Order

The order allows for immediate cessation of unauthorized discharges, thus halting the noncompliance and removing any threat to the POTW or receiving stream.

Disadvantage of the Cease and Desist Order

The cease and desist order may damage municipal/industrial relationships by forcing an industry to halt production before being given an opportunity to solve the problem.

Consent Orders

The consent order combines the force of an AO with the flexibility of a negotiated settlement. The consent order is an agreement between the Authority and the industrial user normally containing three elements: (1) compliance schedules; (2) stipulated fines or remedial actions; and (3) signatures of Authority and industry representatives.

A consent order is appropriate when the user assumes responsibility for its noncompliance and is

willing (in good faith) to correct its cause(s). The user need not admit the noncompliance in the text of the order. Thus, signing the order is neither an admission of liability for purposes of civil litigation nor a plea of guilty for purposes of criminal prosecution. However, the Authority must make sure that the consent order prohibits future violations and provides for corrective action on the part of the industry.

In determining the terms to include in the consent order, the Authority may take a user's extenuating circumstances (e.g., financial difficulties, technical problems, and other impediments to necessary corrective action) into consideration.

The consent order should address every identified (and potential) deficiency in the user's compliance status at the time of the order. Items typical of a consent decree include:

1. Obtain the services of a licensed professional engineer specializing in wastewater pretreatment to design a pretreatment system;
2. Submit plans of the proposed pretreatment system to the Authority for review and approval;
3. Install a pretreatment system;
4. Achieve compliance with the limits established in the Authority's ordinance within six (6) months;
5. Pay \$500.00 per day for each day the user failed to comply with any of the requirements or deadlines contained in the order, on written demand of the Authority;
6. Notify the Authority and State of any failure to comply with deadlines set forth in the order, within one working day after expiration of the deadline, in writing, and describe the reason(s) for the failure, additional amounts of time to complete the necessary work, and steps to be taken to avoid further delays.

Advantages of the Consent Order

The consent order is generally the easiest order to draft since its terms have been agreed to by both parties. These terms may include findings of show cause hearings or outcomes of confidential settlement negotiations.

The consent order offers the best means to reach compliance while preserving constructive Authority/industrial user relationships. Because the consent order allows the user to influence approaches to corrective action, it fosters cooperation and may also be the fastest means to attain compliance.

Although the provisions of a consent order reflect a voluntary agreement, its enforceability is equal to that of a cease and desist or compliance order.

Disadvantages of the Consent Order

Since the user has influence in drafting the agreement, final terms may compromise the Authority's desire for stringent enforcement.

The Authority may delay implementing additional enforcement measures while negotiating terms of the consent order.

The provisions of a consent order, unless carefully drafted, are subject to conflicting interpretations by the parties.

Show Cause Hearing

An order to "Show Cause" directs the user to appear before the Authority, explain its noncompliance, and show cause why more severe enforcement actions against the user should not go forward. The order to show cause is typically issued after informal contacts of NOVs have failed to resolve the noncompliance. However, the show cause hearing can also be used to investigate violations of previous orders.

The show cause hearing can be conducted by the Authority's attorney, the Authority's Manager, or an impartial official designated by the Authority. It will usually be conducted by the Authority's attorney. The hearing may be formal (i.e., conducted according to the rules of evidence, with verbatim transcripts and cross-examination of witnesses) and open to the public. Alternatively, the Authority may choose to conduct an informal hearing or close it to the public. However, findings resulting from informal hearings should also be carefully documented. For example, the Authority could use an informal hearing to interview employees of the industrial user, examine discharge records, or negotiate the installation of a pretreatment system.

If a formal hearing is held, the Authority will typically put forth evidence of noncompliance. In response, the user may admit or deny the noncompliance, explain mitigating circumstances, demonstrate its eventual compliance, and describe all other corrective measures. During the hearing, the Authority can explore the circumstances surrounding the noncompliance and evaluate the sufficiency of the evidence for subsequent civil or criminal actions. If the user does not understand the violation's nature (that is, what constitutes a violation under the ordinance), the hearing can serve to educate the user while saving the Authority litigation expenses.

The hearing officer must then determine whether further action is warranted and, if so, its nature and extent. For example, if the problems causing the noncompliance appear to be resolved or nearly resolved at the hearing's conclusion, a consent decree may be drafted which incorporated the findings of the hearing. If the user must install pretreatment equipment to achieve compliance, the circumstances surrounding the noncompliance should be weighed and a reasonable schedule for installation and start-up developed. Completion of this schedule and any additional requirements will normally be administered through the consent order.

Should the hearing result in an impasse between the user and the hearing officer, the Authority may follow up the meeting by issuing a compliance order, including a schedule, impose a fine or refer the case to its attorney for civil litigation or criminal prosecution. The results of a formal show cause hearing, along with any data and testimony (recorded by tape machine or

stenographer) submitted as evidence, are generally available to the public and may also serve as evidentiary support for future enforcement actions.

Advantages of the Show Cause Hearing

Unlike judicial enforcement in which the Authority (as plaintiff or prosecutor) must affirmatively prove the noncompliance, show cause hearings place the burden of proof on the user to show why its permit should not be suspended or revoked or why it should not be fined or sued for its noncompliance.

The hearing process allows the user to present its case, explain mitigating circumstances or criticize the quality or accuracy of the Authority compliance information.

The hearing can improve the Authority's industrial relationships by promoting communication about noncompliance before judicial remedies are sought.

The hearing process gives the Authority an opportunity to assemble evidence of noncompliance and make it a matter of public record, thus establishing documentation for future enforcement actions.

Disadvantages of the Show Cause Hearing

The show cause hearing involves a greater amount of time and a greater expenditure of resources to effectuate than cease and desist or compliance orders. The hearing may allow a user an excessive length of time to achieve compliance, thereby presenting a disadvantage not only to the pretreatment program but also to other competitors bearing the costs of compliance.

Compliance Orders

A compliance order directs the user to achieve or restore compliance by a date specified in the order. It is issued unilaterally and its terms need not be discussed with the industry in advance. The compliance order is usually issued when noncompliance cannot be resolved without construction, repair, or process changes. Compliance orders are also frequently used to require industrial users to develop management practices, spill prevention programs and related Authority pretreatment program requirements.

The compliance order should document the noncompliance and state required actions to be accomplished by specific dates, including interim and final reporting requirements. In drafting the compliance schedule, the Authority should be firm but reasonable, taking into consideration all factors relevant to an appropriate schedule duration. For example, if the user must install a complete pretreatment system, time should be allowed to obtain the necessary construction permits, and to design and construct the system. However, in such cases the Authority should require intermediate measures to ensure that the user is making acceptable progress.

Once these milestones are set, the Authority must track the user's performance against them and escalate its enforcement response as needed. For example, the Authority may order the user to show cause for failing to meet a major milestone, impose an additional fine or initiate judicial proceedings.

Advantage of the Compliance Order

When confronted with a user not making good faith efforts to achieve compliance, the compliance order is an effective means of ensuring that necessary corrections are implemented. The Authority may design compliance schedules, set milestone dates, prescribe additional or supplementary reporting requirements, or order the industrial user to achieve compliance by a certain date.

Disadvantage of the Compliance Order

Without the user's involvement, the compliance schedule designed by the Authority may not be feasible. Considerable time and effort may be required to enforce milestone dates and procedures that might have been better spent negotiating the terms of a consent order.

**Figure 4-2
Example Cease and Desist Order**

**JACKSON COUNTY WATER AND SEWERAGE AUTHORITY
INDUSTRIAL PRETREATMENT PROGRAM**

IN THE MATTER OF

[NAME OF INDUSTRY]
[ADDRESS]

**CEASE
AND DESIST
ORDER**

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Authority's Manager.

FINDINGS

1. [Industry] discharges nondomestic wastewater containing pollutants into the sanitary sewer system of Jackson County Water and Sewerage Authority.
2. [Industry] is a A significant industrial user.
3. [Industry] was issued a wastewater discharge permit on _____ which contains prohibitions, restriction, and other limitations on the quality of wastewater it discharges to the sanitary sewer.
4. Data is routinely collected or submitted on the compliance status of [Industry].
5. This data shows the [Industry] has exceeded the influent local limits for the following parameters:

[Parameters exceeded]

Figure 4-2
Example of Cease and Desist Order

ORDER

THEREFORE, BASED N THE ABOVE FINDINGS, [INDUSTRY] IS HEREBY ORDERED TO:

1. Within 24 hours of receiving this order, cease all nondomestic discharges into the Authority's sanitary sewer. Such discharges shall not recommence until such time as [Industry] is able to demonstrate that it will comply with its current permit limits.
2. Failure to comply with this order may subject [Industry] to having its connection to the sanitary sewer sealed by the Authority and assessed the costs thereof.
3. Failure to comply with this order shall also constitute a further violation of the sewer use ordinance and may subject [Industry] to civil or criminal penalties or such other enforcement response as may be appropriate.
4. This order, entered this [Date of Order] shall be effective upon receipt by [Industry].

Signed: _____
Authority Manager

**Figure 4-3
Example Consent Order**

**JACKSON COUNTY WATER AND SEWERAGE AUTHORITY
INDUSTRIAL PRETREATMENT PROGRAM**

IN THE MATTER OF

[NAME OF INDUSTRY]

[ADDRESS]

**CONSENT
ORDER**

AGREEMENT

WHEREAS, Jackson County Water and Sewerage Authority pursuant to the powers, duties and responsibilities vested in and imposed upon the Authority, has conducted an ongoing investigation of [Industry] and has determined that:

1. The Authority owns and operates a wastewater treatment plant which is adversely impacted by discharges from industrial users, including [Industry], and has implemented a pretreatment program to control such discharges.
2. [Industry] has consistently violated the pollutant limits in its wastewater discharge permit as set forth in Exhibit 1, attached hereto.
3. Therefore, to ensure that [Industry] is brought into compliance with its permit limits at the earliest possible date, IT IS HEREBY AGREED AND ORDERED, BETWEEN [Industry] AND THE AUTHORITY MANAGER, that [Industry] shall:
 - a. By [Date 1], obtain the services of a licensed professional engineer specializing in wastewater treatment for the purpose of designing a pretreatment system which will bring [Industry] into compliance with its wastewater discharge permit.
 - b. By [Date 2], submit plans and specifications for proposed pretreatment system to the County for review.
 - c. By [Date 3], install the pretreatment system in accordance with the plans and specifications submitted in item b above.
 - d. By [Date 4], achieve compliance with the limits set forth in Exhibit 1.
 - e. [Industry] shall pay \$[Fine Amount] per day for each and every day it fails to comply with the schedule set out in items a-d above.

4. In the event [Industry] fails to comply with any of the deadlines set forth, [Industry] shall, within one (1) working day after expiration of the deadline, notify the Authority in writing. This notice shall describe the reasons for [Industry]'s failure to comply, the additional amount of time needed to complete the remaining work, and the steps to be taken to avoid future delays. This notification in no way excuses [Industry] from its responsibility to meet any later milestones required by this Consent Order.
5. Compliance with the terms and conditions of this Consent Order shall not be construed to relieve [Industry] of its obligation to comply with its wastewater discharge permit which remains in full force and effect. The Authority reserves the right to seek any and all remedies available to it for any violation cited by this order.
6. Nothing in this Consent Order shall be construed to limit any authority of the Authority to issue any other orders or take any other action which it deems necessary to protect the wastewater treatment plant, the environment or the public health and safety.

SIGNATORIES

FOR [INDUSTRY]

Date

[Name]
[Title]

JACKSON COUNTY WATER AND
SEWERAGE AUTHORITY

Date

Authority Manager

**Figure 4-4
Example Administrative Show Cause Order**

**JACKSON COUNTY WATER AND SEWERAGE AUTHORITY
INDUSTRIAL PRETREATMENT PROGRAM**

IN THE MATTER OF

[NAME OF INDUSTRY]

[ADDRESS]

**ADMINISTRATIVE
SHOW CAUSE
ORDER**

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Authority Manager. This order is based on findings of violation of the conditions of the wastewater discharge permit issued.

FINDINGS

1. [Industry] discharges nondomestic wastewater containing pollutants into the sanitary sewer system of Jackson County Water and Sewerage Authority
2. [Industry] is a significant industrial user.
3. [Industry] was issued a wastewater discharge permit on [Date of Permit] which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.
4. Pursuant to the above-referenced permit, data is routinely collected or submitted on the compliance status of [Industry].
5. This data shows that [Industry] has exceeded the influent local limits for the following parameters:

[Parameters exceeded]

Figure 4-4
Example Administrative Show Cause Order

ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, [INDUSTRY] IS HEREBY ORDERED TO:

1. Appear at a meeting with the Authority Manager and Wastewater Operating Manger to be held on [Date of Meeting] at [Time] at 117 MLK Avenue, Jefferson, Georgia 30569.
2. At this meeting, [Industry] must demonstrate why the Authority should not pursue judicial enforcement action against [Industry] at this time.
3. This meeting will be closed to the public.
4. Representatives of [Industry] may be accompanied by legal counsel if they so choose.
5. Failure to comply with this order shall also constitute a further violation and may subject [Industry] to civil or criminal penalties or such other enforcement action as may be appropriate.
6. This order, entered this [Date of Order], shall be effective upon receipt by [Industry].

Signed: _____
Authority Manager

**Figure 4-5
Example Administrative Show Cause Order**

**JACKSON COUNTY WATER AND SEWERAGE AUTHORITY
INDUSTRIAL PRETREATMENT PROGRAM**

IN THE MATTER OF

[NAME OF INDUSTRY]

[ADDRESS]

ADMINISTRATIVE COMPLIANCE ORDER
--

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Authority Manager under Section _____ of the Authority's Sewer Use Resolution. This order is based on findings of violation of conditions of the wastewater discharge permit issued under Section _____ of the Authority's Sewer Use Resolution.

FINDINGS

1. [Industry] discharges nondomestic wastewater containing pollutants into the sanitary sewer system of Jackson County Water and Sewerage Authority
2. [Industry] is a significant industrial user as defined by Section _____ of the Authority Sewer Use Resolution.
3. [Industry] was issued a wastewater discharge permit on [Date of Permit] which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.
4. Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of [Industry].
5. This data shows that [Industry] has violated the Sewer Use Resolution in the following manner:

[Description of violation]

**Figure 4-5
Example Administrative Compliance Order**

ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, [INDUSTRY] IS HEREBY ORDERED TO:

1. Within 180 days, install pretreatment technology which will adequately treat [Industry] wastewater to a level which will comply with its wastewater discharge permit.
2. Within 5 days, submit all periodic compliance reports due since [Date of last report].
3. Within 10 days, pay to the Jackson County Water and Sewerage Authority a fine of \$[Insert Fine] for the above-described violations in accordance with Section 6.10.6 of the Sewer Use Resolution.
4. Report, on a monthly basis, the wastewater quality and the corresponding flow and production information as described on page [insert page number] of the wastewater discharge permit for a period of one year from the effective date of this order.
5. All reports and notices required by this order shall be sent, in writing, to the following address:

Authority Manager
Jackson County Water and Sewerage Authority
P.O. Box 869
Jefferson, GA 30549
6. This order does not constitute a waiver of the wastewater discharge permit which remains in full force and effect. The Authority reserves the right to seek any and all remedies available to it under the Sewer Use Resolution for any violation cited by this order.
7. Failure to comply with the requirements of this order shall constitute a further violation of the Sewer Use Resolution and may subject [Industry] to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.
8. This order, entered this [day]th day of [month], [year], shall be effective upon receipt by [Industry].

Signed: _____
Authority Manager

4.6 Civil Litigation

Civil litigation is the formal process of filing lawsuits against industrial users to secure court ordered action to correct violations and to secure penalties for violations including the recovery of costs to the POTW of the noncompliance. It is normally pursued when the corrective action required is costly and complex, the penalty to be assessed exceeds that which the Control Authority can assess administratively or when the industrial user is considered to be recalcitrant and unwilling to cooperate. The term “civil litigation” also includes enforcement measures which require involvement or approval by the courts, such as injunctive relief and settlement agreements. Civil litigation is similar to criminal prosecution in that it requires the full cooperation of the attorney and may result in court trials of industrial users and assessment of penalties. However, civil litigation is conducted for different purposes and requires a less stringent burden of proof in order for the Authority to prevail. Civil litigation will require the involvement of the Authority Attorney.

4.7 Criminal Prosecution

Criminal prosecution is the formal process of charging individuals and/or organizations with violations of ordinance provisions that are punishable, upon conviction, by fines and/or imprisonment. The purposes of criminal prosecution are to punish noncompliance established through court proceedings and to deter future noncompliance. Criminal offenses are traditionally defined as either felonies or misdemeanors.

Federal law defines misdemeanors as offenses other than felonies. Misdemeanors are generally punishable by fines of up to \$1,000 or imprisonment for less than 1 year. Most offenses punishable under local sewer use ordinances such as tampering with monitoring equipment, falsifying self-monitoring reports, or failing to report illegal discharges are misdemeanors.

There are two elements to a crime: (1) an act in violation of the law; and (2) criminal intent. Acts which might themselves be characterized as “criminal” may not result in prosecution if the prosecutor cannot prove intent or criminal negligence. In other words, the industrial user either must have intended to break the law or was so indifferent to the nature and implication of its act that it could be deemed criminally negligent. Unless a prosecutor can prove both of these elements, criminal prosecution is not a viable enforcement option. Civil litigation will also require the involvement of the Authority Attorney.

4.8 Termination of Sewer Service

Termination of service is the revocation of an industrial user’s privilege to discharge industrial wastewater into the Authority’s sewer system. Termination may be accomplished by physical severance of the industry’s connection to the collection system, by issuance of an administrative order which compels the user to terminate its discharge, or by a court ruling. However, since termination of service may force industries to halt production and may force closure (if discharge privileges are not reinstated), the Authority must carefully consider all of the legal and operational implications of termination before using this enforcement response.

4.9 Enforcement Response Guide

Table 4-2 presents a guide for assisting Authority’s personnel in making enforcement responses to industrial user violations. This guide identifies types of violations, indicates initial and follow-up responses and designates personnel and time frames for these responses. The enforcement guide is used as follows:

1. Locate the type of noncompliance in the first column and identify the most accurate description of the violation.
2. Assess the appropriateness of the recommended response(s) in column two. First offenders or users demonstrating good faith efforts may merit a more lenient response. Similarly, repeat offenders or those demonstrating negligence may require a more stringent response.
3. Apply the enforcement response to the industrial user. Specific corrective action or other responses required of the industrial user, if any. Column three indicates personnel to take each response and the time frame in which that response should be taken.
4. Follow-up with escalated enforcement action if the industrial user’s response is not received or violation continues.

The Authority should remember to maintain all supporting documentation regarding the violation and its enforcement actions in the industrial user’s file.

Description of Terms

Terms and abbreviations used in the enforcement response guide are defined below:

AO	Administrative Order
AA	Authority Attorney
AM	Authority Manager
Civil Litigation	Civil action against the industrial user seeking equitable relief, monetary penalties and actual damages.
Criminal Prosecution	Pursuing punitive measures against an individual and/or organization through a court of law.
Fine	Monetary penalty assessed by Authority officials. Fines should be assessed by the Wastewater Operations Manager or the Authority Manager.
IU	Industrial User

Meeting	Informal compliance meeting with the INDUSTRIAL USER to resolve recurring noncompliance.
NOV	Notice of Violation
PC	Pretreatment Coordinator
Sewer Use Policy	Sewer Use Resolution
SV	Significant Violation
Show Cause	Formal meeting requiring the Industrial User to appear and demonstrate why the Authority should not take a proposed enforcement action against it. The meeting may also serve as a forum to discuss corrective actions and compliance schedules.
WOM	Wastewater Operations Manager

Table 4-2

Jackson County Water and Sewerage Authority Industrial Wastewater Pretreatment Program Enforcement Response Guide				
UNAUTHORIZED DISCHARGES (No Permit)				
	NONCOMPLIANCE	NATURE OF THE VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
1.	Unpermitted discharges	IU unaware of requirement; no harm to POTW/environment	Phone call; NOV with application form	PC, WOM
		IU unaware of requirement; harm to POTW	- AO with fine - Civil litigation	WOM, AM, AA
		Failure to apply continues after notice by POTW	- Civil litigation - Criminal prosecution - Terminate service	WOM, AM, AA
2.	Non-permitted discharge (Failure to renew)	IU has not submitted application within 10 days of due date	Phone call; NOV	PC, WOM
DISCHARGE LIMIT VIOLATION				
	NONCOMPLIANCE	NATURE OF THE VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
1.	Exceedance of local, State or Federal Standard (permit limit)	Isolated, not significant	Phone Call; NOV	PC
		Isolated, significant (no harm)	AO to develop spill prevention plan and fine	WOM
		Isolated, harm to POTW or environment	- Show Cause Order - Civil litigation	WOM, AM, AA
		Recurring, no harm to POTW/environment	AO with fine	WOM
		Recurring; significant (harm)	- AO with fine - Show Cause Order - Civil litigation - Terminate Service	AM, AA

Table 4-2

MONITORING AND REPORTING VIOLATIONS				
	NONCOMPLIANCE	NATURE OF THE VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
1.	Reporting violation	Report is improperly signed or certified	Phone call or NOV	PC, WOM
		Report is improperly signed or certified after notice by County	- AO - Show Cause Order	WOM
		Isolated, not significant (e.g. 5 days late)	Phone call; NOV	PC, WOM
		Significant (e.g., report 30 days or more late)	AO to submit with fine per each additional day	WOM
		Reports are always late or no reports at all	- AO with fine - Show Cause Order - Civil litigation	WOM, AM, CA
		Failure to report spill or changed discharge (no harm)	NOV	PC
		Failure to report spill or changed discharge (results in harm)	- AO with fine - Civil litigation	WOM, AM, CA
		Repeated failure to report spills	- Show Cause Order - Terminate service	WOM, AM
		Falsification	- Criminal prosecution - Terminate service	CA, WOM, AM
2.	Failure to monitor correctly	Failure to monitor all pollutants as required by permit	NOV to AO	PC, WOM
		Recurring failure to monitor	- AO with fine - Civil litigation	WOM, AM, CA
3.	Improper sampling	No evidence of intent	NOV	PC, WOM
		Evidence of intent	- Criminal prosecution - Terminate service	WOM, CA, AM

Table 4-2

MONITORING AND REPORTING VIOLATIONS (Continued)				
	NONCOMPLIANCE	NATURE OF THE VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
4.	Failure to install monitoring equipment	Delay of less than 30 days	NOV	PC, WOM
		Delay of 30 days or more	AO to install with fine for each additional day	WOM
		Recurring, violation of AO	- Civil litigation - Terminate service	CA, WOM, AM
5.	Compliance Schedules (in permit)	Missed milestone by more than 30 days, or will not affect final milestone	NOV or AO with fine	PC, WOM
		Missed milestone by more than 30 days, or will affect final milestone (good cause for delay)	AO with fine	WOM
		Missed milestone by more than 30 days, or will affect final milestone (no good cause for delay)	- Show cause order - Civil litigation - Terminate service	AM, AA, WOM
OTHER PERMIT VIOLATIONS				
	NONCOMPLIANCE	NATURE OF THE VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
1.	Waste streams are diluted in lieu of treatment	Initial violation	AO with fine	WOM
		Recurring	- Show Cause Order - Terminate Service	WOM, AA, AM
2.	Failure to mitigate noncompliance or halt production	Does not result in harm	NOV	PC, WOM
		Does result in harm	- AO with fine - Civil litigation	WOM, AM, CA
3.	Failure to properly operate and maintain pretreatment facility	See No. 2 above		

Table 4-2

VIOLATIONS DETECTED DURING SITE VISITS				
	NONCOMPLIANCE	NATURE OF THE VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
1.	Entry Denial	Entry denied or consent withdrawn Copies of records denied	Obtain warrant and return to IU	WOM, AM
2.	Illegal Discharge	No harm to POTW or environment	AO with fine	WOM
		Discharges causes harm or evidence of intent or negligence	- Civil litigation - Criminal prosecution	WOM, CA, AM
		Recurring, violation of AO	Terminate service	WOM, AM
3.	Improper Sampling	Unintentional sampling at incorrect location	NOV	PC, WOM
		Unintentionally using incorrect sample type	NOV	PC, WOM
		Unintentionally using incorrect sample collection techniques	NOV	PC, WOM
4.	Inadequate record keeping	Inspector finds files incomplete to missing (no evidence if intent)	NOV	PC, WOM
		Recurring	AO with fine	WOM
5.	Failure to report additional monitoring	Inspection finds additional files	NOV	PC, WOM
		Recurring	AO with fine	WOM
TIMEFRAMES FOR RESPONSES				
A	All violations will be identified and documented within five days of receiving compliance information.			
B	Initial enforcement responses [involving contact with the industrial user and requesting information on corrective or preventative action(s)] will occur within 15 days of violation detection.			

C	Follow up actions for continuing or recurring violations will be taken within 60 days of the initial enforcement response. For all continuing violations, the response will include a compliance schedule.
D	Violations which threaten health, property or environmental quality are considered emergencies and will receive immediate responses such as halting the discharge or terminating service.
E	All violations meeting the criteria for significant noncompliance will be addressed with an enforceable order within 30 days of the identification of significant noncompliance.

4.10 Emergency Response Procedures

Authority Wastewater Treatment Facility personnel utilize immediate response procedures to be put into effect in emergency situations. Personnel managing the Industrial Pretreatment Program should also be familiar with these procedures. Every effort must be made to track down the source of toxic discharge or slug loadings that cause emergency situations at the wastewater treatment plant.

4.11 Procedures for Investigating Noncompliance

The following procedures should be utilized for the investigation of industrial user noncompliance:

Screening Industrial Users Reports

Industrial user self monitoring reports should be reviewed within one week of receipt. All sampling parameters should be compared to a listing of allowable pollutant concentrations to determine if violations have occurred. See Section 5 for report review procedures.

Conducting and Screening Results of POTW Sampling

All industrial users should be sampled at least once per year for all parameters included in the permit. See Section 5 for sampling procedures.

Influent, effluent and sludge at the Authority's treatment plant should also be sampled at least once per year. The results of these tests should be reviewed within two weeks of receipt. Pollutants that are found to be in excess of normal concentrations should be listed and an investigation should be made of industries that might be expected to discharge such pollutants.

Investigation of Public Complaints

Public complaints should be investigated within two (2) days of receipt. If the public complaint includes information regarding a noncompliant industrial user, an unannounced inspection of that industry should be carried out immediately.

SECTION 5 PROGRAM IMPLEMENTATION

5.1 Control Mechanism

The control mechanism by which Jackson County Water and Sewerage Authority will regulate industrial users will be by an individual permit under the Authority's sewer use policy. Permits will be issued to those industrial users that are classified as significant industrial users according to 40CFR403.3(t) as explained later in this section. Potential industrial users must first submit a permit application to the Authority to obtain permission to connect or continue to discharge into the Authority's sewer system.

5.1.1 Review of Permit Application

When requested to do so by the Authority, all significant industrial users shall complete and file with the Authority an application for a permit accompanied by a fee as set by the Authority from time to time. Existing users shall apply for a discharge permit within sixty (60) days of notification by the Authority that a discharge permit is required. Proposed new users shall make application not less than ninety (90) days prior to connecting to or contributing to the Authority Wastewater System. A sample permit application is included on page 91 as Figure 5.1.

The Wastewater Operations Manager or Chief Engineer will be responsible for issuing application forms to new users and to ensure that existing users submit a new, completed application within the time frame stated above. The form must be returned to the Pretreatment Coordinator or Wastewater Operations Manager.

The Pretreatment Coordinator/Wastewater Operations Manager shall be responsible for the following steps after receipt of a completed application:

- 1) Reviewing the completed application for completeness. If any information is missing or is incomplete, the Coordinator must contact the Industrial User to obtain the additional information;
- 2) Forwarding the application to the Authority's Consulting Engineer for reviewing it for accuracy, classifying the Industrial User and determining if a permit will be required. If necessary, the Authority's Consulting Engineer will prepare a proposed permit (including determining discharge limits, need for slug control and/or spill prevention plans, monitoring requirements, etc.) and will return it to the PC, and
- 3) Informing the Industrial User of its classification.

The Authority's Consulting Engineer will also assist the Authority staff in any of these tasks as needed.

5.1.2 Classification of Industrial User

After review of the completed application, the Authority's Consulting Engineer will make a preliminary determination as to whether the user is considered a significant industrial user or not, whether it falls under a categorical standard and whether it is potentially subject to the Resource Conservation and Recovery Act (RCRA). The criteria used to determine if the Industrial User should be classified as a Significant Industrial User is included in 40CFR 403.3(t) and is repeated here:

- Does user contribute >5% of the average dry weather hydraulic or organic capacity of the POTW?
- Does user have a process discharge of greater than or equal to 25,000 gallons per day?
- Is user subject to categorical pretreatment standards?
- Does user have a potential to inhibit or upset the POTW treatment plant process?
- Does user have a potential to cause a violation of the treatment plant's NPDES permit or water quality criteria?
- Does user have a potential to limit sludge disposal options?
- Does user have a reasonable potential to violate any pretreatment standards or requirements, including toxic pollutants (as defined by Section 307 of the Clean Water Act) in their discharge?

If the user is considered to be a Significant Industrial User, a proposed permit will be prepared and delivered to the Industrial User. The permit will be prepared by the consulting engineer and will follow the guidelines established in EPA's publication titled *Industrial User Permitting Guidance Manual*. Some important issues to address during preparation of the permit include:

- Local limits must be compared to categorical standards, if applicable, and the most stringent limit included in the permit.
- If the Industrial User combines the regulated discharge or discharges with domestic-type wastewater or other non-regulated stream, then the combined wastestream formula (CWF) must be applied. This is because categorical limits apply to process wastewater discharge only (end-of-process) and dilution is not allowed as a method to reduce pollutant concentration.
- Production-based categorical standards must be applied when called for in the part of Title 40 of the Code of Federal Regulations that applies to the categorical Industrial User in question. EPA has issued categorical standards that are: (1) concentration-based, (2) production-based, and (3) both. The Authority's Consulting Engineer will refer to EPA's publication "*A Guidance Manual for the Use of Production-Based Pretreatment Standards and the*

Combined Wastestream Formula” for determination of equivalent concentration limits where production-based standards must be applied.

- If a user is not in compliance with proposed limits when a permit is issued, a compliance schedule will be incorporated in the permit. Compliance schedules will also be a part of enforcement actions such as consent orders and administrative compliance orders, if required.
- The Authority must require all significant industrial users to report at least twice per year.
- The Authority will require all significant industrial users to sample for all parameters in the permit at least twice per year.

A sample permit application checklist is included on page 91 as Figure 5.1. A sample permit is also included on page 123 as Figure 5.2. A fact sheet showing all decisions made must be prepared and filed with the permit application. This fact sheet is very important in case the classification is challenged by the user or the public and to show that the determination was developed in a reasonable, non-arbitrary manner and in accordance with proper procedures. A sample fact sheet is included in EPA’s publication *“Industrial User Permitting Guidance Manual”*.

5.2 Compliance Reporting and Verification Procedures

The following policies and procedures will be used to ensure that industrial user compliance is properly reported and verified.

5.2.1 Receipt and Analysis of Industrial User Reports

Pretreatment Program personnel will follow procedures to insure that industrial user reports are received in accordance with the schedule included in the permit and that the reports are reviewed promptly and thoroughly upon receipt from the user.

- **Tracking System**

A tracking system will be utilized to track whether reports are being received as scheduled. A simple tracking system will be used in the beginning composed of a dedicated calendar with report dated written in. The Pretreatment Coordinator will check this calendar every day. At some time in the future the Authority may develop a computer database program using Microsoft Excel’s database capabilities to store reporting data and this program could include a warning system to notify personnel when reports are due.

- **Personnel Responsibilities**

The Pretreatment Coordinator or Wastewater Operations Manager will have primary responsibility for review of industrial user reports. The Authority Manager will be kept informed of the status of all reviews. Review of reports will be initiated within one week of receipt and should be completed in less than one week after starting the review.

○ **Review Procedures**

The following is a list of items to be considered when reviewing industrial user reports:

- Proper certification of the report. The reviewer must check that the report is certified in accordance with permit requirements.
- Comparison of reported values with permit requirements. All reported values must be compared with a listing of allowable limits under the user's permit. It is recommended that the values be entered into a computer spreadsheet that compares the reported values with the permit limits.
- Verify that sampling dates are within the reporting period. The reviewer must verify that the dates of all samples are given and that these dates are within the period covered by the report.
- Comparison with compliance schedules. The reviewer must check the permit for compliance schedules and ensure that the report describes whether these are being met or not.
- Comparison with Authority sampling data. Where the Authority has performed sampling that may be coincident with the industry's sampling, these values must be compared.
- Determine if verification sampling is needed. The reviewer may determine that verification sampling should be performed if reported data does not appear consistent with the Authority's knowledge of the industry.
- Determine the need for enforcement action. If the report indicates that the user is not in compliance with the permit, a Notice of Violation should be sent. If the report shows evidence of a continuing violation, more serious enforcement action may be necessary. Consult the Enforcement Response Plan to determine the proper response.

5.3 Inspections of Industrial Users

Periodic inspections of industrial users are an important part of the Industrial Wastewater Control Program. Pretreatment regulations require that all significant users be inspected at least once a year. Also, at least one inspection per year should be unannounced. The Pretreatment Coordinator will consult EPA's manual titled "*Guidance for Conducting a Pretreatment Compliance Inspection*" for guidance before, during and after conducting each inspection. The annual inspection should at least cover the following items:

- Manufacturing facility
- Chemical storage areas
- Hazardous waste generation
- Spill prevention and control

- Pretreatment facilities
- Industrial user sampling procedures
- Laboratory procedures
- Monitoring and haulers records
- Record keeping

A sample inspection form is provided on page 139 as Figure 5.3.

5.4 Sampling of Industrial Users

Periodic sampling of industrial users is also an important part of the Industrial Wastewater Control Program. Pretreatment regulations require that all significant users be sampled at least once a year. Also, at least one sampling inspection per year should be unannounced. The following minimum procedures should be followed for performing sampling inspections:

Scope of pollutants to sampled for. The industrial effluent should be sampled for all parameters listed in the user's permit.

Closed cup flashpoint test. Where the Authority has reason to suspect the user to be discharging materials that could create a fire or explosion hazard in the sewer system, a closed-cup flashpoint test should be performed using the test methods as specified in 40 CFR 261.21.

Sample types. Where appropriate, composite samples should be used to sample for compliance with categorical standards. However, grab samples should be used for cyanide, pH, residual chlorine, total phenol, oil and grease, sulfide and volatile organics.

Quality assurance. Personnel should use accepted procedures for quality assurance in sampling. All samples must be properly labeled and a chain of custody form similar to the ones the Authority has been using must accompany each sample. Chain-of-custody procedures must be followed strictly and must include:

- Date and time sample was taken
- Signature of all persons handling the sample
- Date and time that sample changed hands
- Type of sample
- Preservatives added to sample
- Analytical methods used
- Security measures employed

A sample chain of custody form is included in this section on page 74 as Figure 5.4 for the Authority's use. Samples must be analyzed in accordance with 40 CFR 136. Some typical sample preservation and holding periods are shown in Table 5-1 on page 68.

**Table 5-1
Sample Preservation and Holding
Periods for Selected Parameters**

Parameter	Preservative	Maximum Holding Period (Recommended)
BOD	Refrigeration at 4°C	6 hours
COD	H ₂ SO ₄ to pH <2	7 days
Cyanide, total	NaOH to pH>12 at 4°C	24 hours
Metals, total	5 mL HNO ₃ /L	6 months
Metals, dissolved	Filter immediately, HNO ₃ to pH <2	6 months
Oil and Grease	H ₂ SO ₄ to pH <2 at 4°C	24 days
pH	Determine on site	None
Phenols	H ₂ SO ₄ to pH<,2 at 4°C	Analyze as soon as possible
Solids	None	7 days

If an unusual condition is noted in the collection system, wastewater plant influent or in any of the wastewater treatment units, such as odor, color, foam, pH, etc., a sample of the influent is taken immediately and analyzed for pH, temperature, and COD. Normally only a few industrial users, and more than likely the significant industrial users, have the potential to seriously affect POTW operations. Therefore, the Authority staff will contact by telephone all the Significant Industrial Users to see if any of them has made changes or has had upsets or spills that could have affected their discharge into the sewer.

If no significant industrial user reports any problems, the Pretreatment Coordinator (PC) may still wish to test recent samples from the industrial users where continuous samplers have been installed. The PC usually maintains samplers that monitor the discharge of some of the Significant Industrial Users continuously (sampling every 15 minutes is typical). Tests that should be run include pH and COD. If unusual color or odor is detected in the samples, additional tests may be necessary, depending on the nature of the damage caused in the collection system or the POTW. It is important to document all events starting with the time when the unusual occurrence is first noticed.

If necessary, enforcement action is taken using the Enforcement Response Guide.

5.5 Program Resources

In order for the Industrial Pretreatment Program to be effective, it is essential that the Authority dedicate adequate resources for the program. These resources include personnel, equipment, and funding for contract laboratory services. The following is a description of the staffing and equipment proposed to be provided for the program.

5.5.1 Organization and Staffing

Staffing responsibilities for specific program activities are as follows:

Technical Review - Technical review of industrial user reports will be performed by the Pretreatment Coordinator or Wastewater Operations Manager. Assistance will be provided by the Consulting Engineer as needed.

Permit Preparation - This will be done by the Wastewater Operations Manager. Assistance will be provided by the Pretreatment Coordinator or the consulting engineer.

Inspections - Inspections will be performed by the Pretreatment Coordinator or Wastewater Operations Manager. Other staff members may also participate in inspections. Figure 5.3 on page 139 offers a sample inspection form.

Sampling - Sampling will be performed by the Pretreatment Coordinator or Wastewater Operations Manager with assistance from wastewater treatment plant staff.

Laboratory Analysis - All laboratory analyses will be performed by a contract laboratory. Analyses for pH will be performed on site by the person doing the sampling.

Legal Assistance - Legal assistance will be provided by the Authority's Attorney.

Enforcement - Minor enforcement activities will be carried out by the Wastewater Operations Manager and the Authority Manager. More serious enforcement activities will require action by the Authority Attorney. See the Enforcement Response Guide.

Clerical Duties - Most of these duties will be handled by the Pretreatment Coordinator or the Wastewater Operations Manager.

Overall Program Administration - The Authority has ultimate responsibility for program administration. Most administrative activities are delegated to the Pretreatment Coordinator.

A list of tasks and estimated time required of each personnel category is shown below. The approximate amount of time on a monthly basis that each person will be dedicating to the pretreatment program is as follows:

- Authority Manager 2.0 hours
- Consulting Engineer 2.0 hours
- Wastewater Operations Manager 8.0 hours
- Pretreatment Coordinator 16.0 hours
- Authority Attorney 1.0 hours

5.5.2 Equipment

The following equipment is available for use by program personnel to carry out the required activities of the program.

- YSI Model 5100 D O Meter
- YSI Model Y55 D O Meter
- Standard Methods for the Examination of water and wastewater 21st edition*
- Refrigerator
- Flow Meter, Water specialties Model UM-06 or equivalent
- ISCO 3710 portable sampler
- Hach COD reactor
- Hach data logging colorimeter DR 890
- Orion portable pH meter Model 230
- 1 Tighten miller safety Harness
- 1 Desk top computer
- Safety goggles and rubber gloves
- 1 pickup truck
- Confined Space Gas Meter

5.5.3 Funding

The Pretreatment Program will be funded out of the general operating fund of the Authority (which is funded by regular wastewater treatment user fees), the industrial user permit fees, monitoring charges and industry surcharges. A projected three year budget for program implementation is set out in Table 5.2. The budget includes all projected costs of personnel, equipment and enforcement activities.

Table 5.2
Projected three year budget

Year	FYI 2008	FYI 2009	FYI 2010
Staffing	\$10,800.00	\$11,340.00	\$12,020.00
Equipment	\$ 800.00	\$ 1,200.00	\$ 1,200.00
Engineering assistance	\$ 5,000.00	\$ 5000.00	\$ 5000.00
Legal assistance	\$ 1500.00	\$ 1500.00	\$ 1500.00
Transportation	\$ 1000.00	\$ 1000.00	\$ 1000.00
Recordkeeping	\$ 200.00	\$ 200.00	\$ 200.00
Outside Lab	\$ 6,500.00	\$ 7,500.00	\$ 9,500.00
Training	\$ 500.00	\$ 500.00	\$ 500.00
Annual Reports	\$ 300.00	\$ 300.00	\$ 300.00
Totals	\$ 26,600.00	\$ 28,540.00	\$ 31,220.00

5.6 Notifications Procedures

5.6.1 Regulatory Updates

The Authority is a member to the Georgia Association of Water Professionals and the Water Environmental Federation and receives monthly newsletters from both entities which newsletters print all newly implemented or modified rules and regulations under 40 CFR 403. The Wastewater Operations Manager has the responsibilities of reviewing the rules and regulations and updating the Pretreatment Program as necessary. In addition, all State certified personnel of the Authority attend continuing education classes and association meetings.

5.6.2 Notification of Users

Within thirty days (30) of any change in the Pretreatment Program due to any change in a rule or regulation, the Wastewater Operations Manager will notify all industrial users, or other affected users, of the change in the Program and provide instructions for meeting the requirements of any new rules.

5.6.3 Slug Control Program

At least every two years the Wastewater Operations Manager is required to evaluate whether significant industrial users need an accidental discharge/slug control program. If a program is required of a user, the program must include a description of discharge practice, stored chemicals, procedures for notification of the Wastewater Operations Manager of any discharges and procedures to be implemented by the user to prevent any adverse impact from any accidental or slug discharge.

FIGURE 5.4 Jackson County Chain of Custody Record

Job Site _____				Preservation Required										Page ___ of ___					
Report Name _____				ICE	ICE	ICE													
				Analysis Required															
Samplers(s): (Print and Sign)				COD	BOD	TSS	Fecal Coliform												
Date	Time	Sample Description	Matrix	Use AX@ on Parameters to be analyzed										# of Bottles	Remarks				
Relinquished by: _____				Date/Time		Received By: _____				Date/Time		Remarks							
Relinquished by: _____				Date/Time		Received for Lab by _____				Date/Time		Lab Sample Numbers							

**Jackson County Water & Sewerage Authority
Industrial Questionnaire**

**Section A
General Information**

- A1. Applicant Business Name _____
- A2. Address of Premise Discharging Wastewater
Street _____
City _____ State _____ Zip _____
- A3. Business Address
Street or P.O. Box No. _____
City _____ State _____ Zip _____
- A4. Name and Title of Signing Official
Name _____ Title _____
- A5. Person to be contacted about this application.
Name _____ Title _____ Phone _____
- A6. Person to be contacted in case of emergency.
Name _____ Day Phone _____ Night Phone _____

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.

Date _____
Signature _____

NOTE to signing Official: In accordance with Title 40 of the Code of Federal Regulations 403.14, information and data provided in this questionnaire which identified the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of information shall be governed by procedures specified in 40 CFR Part 2.

**SECTION B
PRODUCT OR SERVICE INFORMATION**

B1. Provide a brief narrative of manufacturing or service activity at premise address: (Include principal raw materials, catalysts, intermediates, products)

B2. List the Standard Industrial Classification (SIC) Codes for principal products or services:

<u>PRODUCTS OR SERVICES</u>	<u>SIC CODE (4 digit)</u>	<u>PERCENTAGE OF PRODUCTION</u>
---------------------------------	-------------------------------	---

B3. Substances Discharged - Give common and technical names of each raw material and product that may be discharged to the sewer. Briefly described the physical and chemical properties of each substance and produce.

<u>COMMON/TECHNICAL</u>	<u>PHYSICAL AND CHEMICAL PROPERTIES</u>
-------------------------	---

SECTION B (continued)
PRODUCT OR SERVICE INFORMATION

B4. What potentially hazardous, corrosive, flammable, explosive, or toxic substances are handled at your plant? Identify those which could possibly be discharged to a sewer.

B5. Describe all wastewater generating operations (including processes and clean-ups).

B6. Identify information entitled to protection as a trade secret.

Section

Reason

B7. Is your facility subject to a Federal Categorical Pretreatment Standard, and if so which one?

SECTION C
PLANT OPERATIONAL CHARACTERISTICS

C1. Are major processes batch or continuous? _____
If batch, average number of batches per 24 hour day: _____

C2. Variation of Operation

Indicate whether the business activity is:

a. _____ Continuous through the year, or
_____ Seasonal- Circle the months of the year during which operations occur:
J F M A M J J A S O N D Peak month(s) of operation is (are) _____

b. _____ Continuous throughout the week, or
_____ Circle the days of the week during which operations occur: S M T W T F S Peak
day(s) of operation is (are) _____

c. _____ Are there any scheduled shutdowns? Yes _____ No _____ When? _____

Reason: _____

C3. Wastewater Discharge Periods

a. Discharge occurs daily: from _____ to _____
Circle the days of the week that discharge occurs: S M T W T F S
Peak day(s) of discharge is (are) _____

b. Clean-up discharge daily: from _____ to _____
Circle the days of the week that discharge occurs due to clean-up:
S M T W T F S

**SECTION C
PLANT OPERATIONAL CHARACTERISTICS**

C4. Shift Information:
Total Number of Employees _____

OFFICE	PRODUCTION (number of employees per shift)		
No. Hours	Day Shift No. Hours	P.M. Shift No. Hours	A.M. Shift No. Hours
WEEKDAY	to	to	to
SATURDAY	to	to	to
SUNDAY	to	to	to
SEASONAL	to	to	to

C5. Describe any wastewater treatment equipment or processes in use (includes sediment traps and grease traps):

C6. Describe any raw water treatment process utilized:

SECTION C (continued)
PLANT OPERATIONAL CHARACTERISTICS

C7. Describe any water recycling processes utilized:

C8. List the type and volume of liquid waste or sludges removed from the premises by means other than community sewers.

<u>DESCRIPTION</u>	<u>VOLUME (gals/mo)</u>	<u>REMOVED BY</u> <u>(Name & Address)</u>
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C9. Is there a Spill Prevention Control and Countermeasure Plan in effect for this plant?
Yes _____ No _____
If Yes, describe briefly or attach copy to questionnaire.

C10. Are there any Backflow Preventers in your system?
Yes _____ No _____

C11. Have you checked your system regarding Cross Connection Prevention or Control at this plant?
Yes _____ No _____
If yes, describe briefly or attach copy to questionnaire.

SECTION D
WATER USE AND DISCHARGE INFORMATION

D1. List each raw water source (city, county, well, other), account number (if applicable), designated use (fire service, production, lawn sprinkler, etc. and average monthly consumption (indicate units):

<u>Source</u>	<u>Account Number</u>	<u>Use</u>	<u>Consumption</u>
---------------	-----------------------	------------	--------------------

D2. Indicate water use categories, distribution of water used and the means of wastewater disposal (sanitary sewer, storm sewer, waste hauler, other):

<u>Water Used For</u>	<u>Water Supply Percentage of Total</u>	<u>Discharged to:</u>
Sanitary _____		
Process _____		
Boiler _____		
Cooling _____		
Other * _____		
In Product _____		
Measured _____	Estimated _____	

*Describe other water uses(s): _____

SECTION E PRIORITY POLLUTANT SURVEY

E1. Indicate to the best of your ability, the known presence or known absence of the materials listed in E2. It is not necessary to undertake a sampling program to complete this section. Respond by checking the appropriate column indicating which of the following description is applicable.

Check Column A if the compound is not used as a raw material, stored on site, transported or produced whether as a product or by-product.

Check Column B if the compound is used as a raw material, stored on site, transported or produced whether as a product or by-product, but is not in wastewater discharge.

Check Column C if the compound is used as a raw material, stored on site, transported or produced whether as a product or by-product, and may be in wastewater discharge.

Check Column D if the compound is known to be in wastewater.

E2. PRIORITY POLLUTANTS

<u>VOLATILES</u>	A KNOWN ABSENT	B SUSPECTED ABSENT	C SUSPECTED PRESENT	D KNOWN PRESENT
2. Acrolein	_____	_____	_____	_____
3. Acrylonitrile	_____	_____	_____	_____
4. Benzene	_____	_____	_____	_____
6. Carbon Tetrachloride	_____	_____	_____	_____
7. Chlorobenzene	_____	_____	_____	_____
10. 1,2-Dichloroethane	_____	_____	_____	_____
11. 1,1,1-Trichloroethane	_____	_____	_____	_____
13. 1,1-Dichloroethane	_____	_____	_____	_____
14. 1,1,2-Trichloroethane	_____	_____	_____	_____
15. 1,1,2,2-Tetrachloroethane	_____	_____	_____	_____
16. Chloroethane	_____	_____	_____	_____

VOLATILES (Continued)

<u>VOLATILES</u>	A KNOWN ABSENT	B SUSPECTED ABSENT	C SUSPECTED PRESENT	D KNOWN PRESENT
23. Chloroform (Trichloromethane)	_____	_____	_____	_____
29. 1,1-Dichloroethylene	_____	_____	_____	_____
30. 1,2-Trans-Dichloroethylene	_____	_____	_____	_____
32. 1,2-Dichloropropane	_____	_____	_____	_____
33. 1,2-Dichloropropylene (1,3-Dichloropropene)	_____	_____	_____	_____
38. Ethlbenzene	_____	_____	_____	_____
44. Methylene Chloride (Dichloromethane)	_____	_____	_____	_____
45. Methyl Chloride (Chloromethane)	_____	_____	_____	_____
46. Methyl Bromide (Bromomethane)	_____	_____	_____	_____
47. Bromoform (Tribromomethane)	_____	_____	_____	_____
48. Dichlorobromomethane	_____	_____	_____	_____
49. Trichlorofluoromethane	_____	_____	_____	_____
50. Dichlorodifluoromethane	_____	_____	_____	_____
51. Chlorodibromomethane	_____	_____	_____	_____
85. Tetrachloroethylene	_____	_____	_____	_____
86. Toluene	_____	_____	_____	_____
87. Trichloroethylene	_____	_____	_____	_____
88. Vinyl Chloride (Chloroethylene)	_____	_____	_____	_____

ACIDS

	A	B	C	D
21. 2,4,6-Trichlorophenol	_____	_____	_____	_____
22. Parachlorometa Cresol	_____	_____	_____	_____

	A KNOWN ABSENT	B SUSPECTED ABSENT	C SUSPECTED PRESENT	D KNOWN PRESENT
<u>VOLATILES</u>				
24. 2-Chlorophenol				
31. 2,4-Dichlorophenol				
34. 2,4-Dimethylphenol				
57. 2-Nitrophenol				
58. 4-Nitrophenol				
59. 2,4-Dinitrophenol				
60. 4,6-Dinitro-o-Cresol				
64. Pentachlorophenol				
65. Phenol				

BASE/NEUTRALS

	A	B	C	D
1. Acenaphthene				
5. Benzidine				
8. 1,2,4-Trichlorobenzene				
9. Hexachlorobenzene				
12. Hexachloroethane				
17. Bis (Chloromethyl) Ether				
18. Bis (2-Chloroethyl) Ether				
19. 2-Chloroethyl Vinyl Ether (mixed)				

BASE/NEUTRALS (continued)

	A	B	C	D
20. 2-Chloronaphthalene				
25. 1,2-Dichlorobenzene				
26. 1,3-Dichlorobenzene				
27. 1,4-Dichlorobenzene				
28. 3,3-Dichlorobenzidine				

<u>VOLATILES</u>	A KNOWN ABSENT	B SUSPECTED ABSENT	C SUSPECTED PRESENT	D KNOWN PRESENT
35. 2,4-Dinitrotoluene				
36. 2,6-Dinitrotoluene				
37. 1,2-Diphenylhydrazine				
39. Fluoranthene				
40. 4-Chlorophenyl Phenyl Ether				
41. 4-Bromophenyl Phenyl Ether				
42. Bis (2-Chloroisopropyl) Ether				
43. Bis (2-Chloroethoxy) Methane				
52. Hexachlorobutadiene				
53. Hexachlorocyclopentadiene				
54. Isophorone				
55. Naphthalene				
56. Nitrobenzene				
61. N-Nitrosodimethylamine				
62. N-Nitrosodiphenylamine				
63. N-Nitrosodi-n-Propylamine				
66. Bis (2-Ethylhexy 1) Phthalate				
67. Butyl Benzyl Phthalate				
68. Di-n-Butyl Phthalate				
69. Di-n-Octyl Phthalate				
70. Diethyl Phthalate				
71. Dimethyl Phthalate				
72. Benzo (a) Anthracene (1,2-Benzanthracene)				
73. Benzo (a) Pyrene (3,4-Benzopyrene)				
74. 3,4-Benzofluoranthene				
75. Benzo (k) Fluoranthene (11,12-Benzofluoranthene)				

	A KNOWN ABSENT	B SUSPECTED ABSENT	C SUSPECTED PRESENT	D KNOWN PRESENT
<u>VOLATILES</u>				
76. Chrysene				
77. Acenaphthylene				
78. Anthracene				
79. Benzo (ghi) Perylene (1,12-Benzoperylene)				
80. Fluorene				
81. Phenanthrene				
82. Dibenzo (a,h) Anthracene (1,2,5,6-Dibenzanthracene)				
83. Indeno (1,2,3-cd) Pyrene (2,3-o-Phebyleneoyrene)				
84. Pyrene				

PESTICIDES

	A	B	C	D
89. Aldrin				
90. Dieldrin				
91. Chlordane (technical mixture & Metabolites)				

PESTICIDES (Continued)

92. 4,4-DDT				
93. 4,4-DDE (p,p-DDX)				
94. 4,4-DDD (p,p-TDE)				
95. a-Endosulfan-Alpha				
96. b-Endosulfan-Beta				
97. Endosulfan Sulfate				
98. Endrin				
99. Endrin Aldehyde				

<u>VOLATILES</u>	A KNOWN ABSENT	B SUSPECTED ABSENT	C SUSPECTED PRESENT	D KNOWN PRESENT
100. Heptachlor				
101. Heptachlor Epoxide				
102. a-BHC-Alpha				
103. b-BHC-Beta				
104. 4-BHC (Lindane)-Gamma				
105. g-BHC-Delta				
106. PCB-1242 (Arochlor 1242)				
107. PCB-1254 (Arochlor 1254)				
108. PCB-1221 (Arochlor 1221)				
109. PCB-1232 (Arochlor 1232)				
110. PCB-1248 (Arochlor 1248)				
111. PCB-1260 (Arochlor 1260)				
112. PCB-1016 (Arochlor 1016)				
113. Toxaphene				
129. 2,3,7,8-Tetrachlorodi-benzo- p-Dioxin (TCDD)				

METALS

	A	B	C	D
114. Antimony (total)				
115. Arsenic (total)				
117. Beryllium (total)				
118. Cadmium (total)				
119. Chromium (total)				
120. Copper (total)				
122. Lead (total)				
123. Mercury (total)				
124. Nickel (total)				

	A KNOWN ABSENT	B SUSPECTED ABSENT	C SUSPECTED PRESENT	D KNOWN PRESENT
<u>VOLATILES</u>				
125. Selenium (total)				
126. Silver (total)				
127. Thallium (total)				
128. Zinc (total)				

	OTHERS			
	A	B	C	D
116. Asbestos (Fibrous)				
121. Cyanide (total)				

PRETREATMENT

Is this plant subject to an existing Federal Pretreatment Standard? _____

If so, are pretreatment standards being met on a consistent basis? _____

If no, list any schedule of additional pretreatment facility construction or increased operation and maintenance required to achieve consistent compliance.

**SECTION F
PRIMARY POLLUTANT SURVEY**

F1. Indicate to the best of your ability, the presence or absence of the materials listed below. These parameters will not receive pretreatment standards beyond that necessary to prevent interference of the sewage treatment plant. The Authority is either limited in the discharge of these components by conditions in its NPDES permit or has historically had some problem handling the particular wastewater component. These components (except lint and dyes) are present in most waters. Therefore, check Known Present unless laboratory results exist showing their absence.

	KNOWN ABSENT	KNOWN PRESENT	CONCENTRATION	
			AVERAGE	PEAK
1. BOD (5) mg/L	_____	_____	_____	_____
2. COD mg/L	_____	_____	_____	_____
3. Nitrogen mg/L	_____	_____	_____	_____
4. Phosphorus mg/L	_____	_____	_____	_____
5. Suspended Solids mg/L	_____	_____	_____	_____
6. Oil & Grease mg/L	_____	_____	_____	_____
7. Lint or other filamentous material	_____	_____	_____	_____
8. Dyes	_____	_____	_____	_____
9. pH (Std. Units)	_____	_____	_____	_____
10. Temperature °C	_____	_____	_____	_____

**Figure 5.1
Sample Permit Application**

**JACKSON COUNTY WATER AND SEWERAGE AUTHORITY
INDUSTRIAL WASTEWATER CONTROL PROGRAM**

INDUSTRIAL USER PRETREATMENT PERMIT APPLICATION

Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations 403.14, information and data provided in this application which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2.

SECTION A - GENERAL INFORMATION

- 1) Company Name: _____
- 2) Mailing Address: _____

- 3) Premise Address: _____

- 4) Name and Title of Signing Official: _____
Telephone No.: _____
- 5) Alternate Person to Contact Concerning Information Provided Herein:
Name and Title: _____
Telephone No.: _____

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.

Name(s) Title

Signature Date Phone

When completed, please return to: Jackson County Water and Sewerage Authority
117 MLK Avenue
Jefferson, GA 30549
(706) 367-1741

6. Will you be connected to the public sanitary sewer system?

Yes No (If no, then do not continue with application. Sign application and return to the Authority)

7. Check one: Existing Discharge

Proposed Discharge

If proposed discharge, anticipated date of discharge commencement:

8. Does or will this facility discharge any wastewater other than from rest rooms to the Authority sewer?

Yes If the answer to this question is Yes, please complete the remainder of the application.

No If the answer to this question is No, skip to Section I.

SECTION B - BUSINESS ACTIVITY

1. If your facility employs or will be employing processes in any of the industrial categories listed below (regardless of whether they generate wastewater, waste sludge, or hazardous waste), place a check beside the category (check all that apply).

(CFR) Industrial Categories	Code of Federal Regulations Reference Number
<input type="checkbox"/> Aluminum Forming	487
<input type="checkbox"/> Asbestos Manufacturing	427
<input type="checkbox"/> Battery Manufacturing	461
<input type="checkbox"/> Canned and Preserved Fruits and Vegetables Processing	407
<input type="checkbox"/> Canned and Preserved Seafood Processing	408
<input type="checkbox"/> Carbon Black Manufacturing	458
<input type="checkbox"/> Cement Manufacturing	411
<input type="checkbox"/> Coal Mining	434
<input type="checkbox"/> Coil Coating	465
<input type="checkbox"/> Copper Forming	468
<input type="checkbox"/> Dairy Products Processing	405
<input type="checkbox"/> Electrical and Electronic Components Manufacturing	469
<input type="checkbox"/> Electroplating	413

Code of Federal Regulations (CFR)
Reference Number

Industrial Categories

[]	Explosives Manufacturing	457
[]	Feedlots	412
[]	Ferroalloy Manufacturing	424
[]	Fertilizer Manufacturing	418
[]	Glass Manufacturing	426
[]	Grain Mills	406
[]	Gum and Wood Chemicals Manufacturing	454
[]	Hospital	460
[]	Ink Formulating	447
[]	Inorganic Chemicals Manufacturing	415
[]	Iron and Steel Manufacturing	420
[]	Leather Tanning and Finishing	425
[]	Meat Products	432
[]	Metal Finishing	433
[]	Metal Molding and Casting	464
[]	Mineral Mining and Processing	436
[]	Nonferrous Metals Forming and Metal Powders	471
[]	Nonferrous Metals Manufacturing	421
[]	Oil and Gas Extraction	435
[]	Ore Mining and Dressing	440
[]	Organic Chemicals Plastic and Synthetic Fibers	414
[]	Pain Formulating	446
[]	Paving and Roofing Materials	443
[]	Pesticides Chemicals	455
[]	Petroleum Refining	419
[]	Pharmaceutical Manufacturing	439
[]	Phosphate Manufacturing	422
[]	Photographic	459
[]	Plastics Molding and Forming	463
[]	Porcelain Enameling	486
[]	Pulp, Paper, and Paperboard	430
[]	Rubber Manufacturing	428
[]	Soap and Detergent Manufacturing	417
[]	Steam Electric Power Generating	423
[]	Sugar Processing	409
[]	Textile Mills	410
[]	Timber Products Processing	429
[]	The Builder's Paper and Board Mills	431

Note: A facility with process inclusive in the above areas may be covered by the Environment Protection Agency's (EPA) categorical pretreatment standards. These facilities are termed categorical users.

2. Give a brief description of all operations at this facility including primary products or service (includes principal raw materials, catalysts, and intermediates used in the process).

3. Indicate applicable Standard Industrial Classification (SIC) for all processes (if more than one applies, list in descending order of importance.):

- a. _____
- b. _____
- c. _____
- d. _____
- e. _____

4. Product Volume:

PRODUCT (Brand Name)	PAST CALENDAR YEAR Amounts per Day (Daily Units)		ESTIMATE THIS CALENDAR YEAR Amounts per Day (Daily Units)	
	Average	Maximum	Average	Maximum
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

SECTION C - WATER SUPPLY

1. Water Sources: (Check as many as are applicable)

- Private Well
- Surface Water
- Municipal Water Utility (Specify City): _____
- Other (Specify): _____

2. List average water usage on premises:
[New facilities may estimate]

<u>Type</u>	<u>Average Water Usage (GPD)</u>	<u>Indicate Estimate (E) or Measured (M)</u>
a. Contact cooling water	_____	_____
b. Non-contact cooling water	_____	_____
c. Boiler feed	_____	_____
d. Process	_____	_____
e. Sanitary	_____	_____
f. Air pollution control	_____	_____
g. Contained in product	_____	_____
h. Plant & equipment wash down	_____	_____
i. Irrigation & lawn watering	_____	_____
j. Other	_____	_____
k. TOTAL OF a-j	_____	_____

SECTION D - SEWER INFORMATION

1. Name, address, and location of the publicly owned treatment works (POTW) to which you discharge.
 - a. Name of organization responsible for receiving waste:

 - b. Facility receiving waste:
 Name: _____
 Street Address: _____
 City: _____ County: _____ State: _____
 NPDES Permit No. _____

2. List size, descriptive location, and flow of each facility sewer which connects to the Authority sewer system. (If more than three, attach additional information on another sheet).

<u>Sewer Size</u>	<u>Descriptive Location of Sewer Connection of Discharge Point</u>	<u>Average Flow (GPD)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

SECTION E - WASTEWATER DISCHARGE INFORMATION

1. Provide the following information on wastewater flow rate:
[New facilities may estimate]

a. Hours/Day Discharged (e.g., 8 hours/day):

M _____ T _____ W _____ TH _____ F _____ SAT _____ SUN

b. Hours of Discharge (e.g., 9 a.m. to 5 p.m.):

M _____ T _____ W _____ TH _____ F _____ SAT _____ SUN

c. Peak hourly flow rate (GPD) _____

d. Maximum daily flow rate (GPD) _____

e. Annual daily average (GPD) _____

2. If batch discharge occurs or will occur, indicate:
[New facilities may estimate]

a. Number of batch discharges _____ per day

b. Average discharge per batch _____ (GPD)

c. Time of batch discharges _____ at _____
(days of week) (hours of day)

- d. Flow rate _____ gallons/minute
- e. Percent of total discharge _____

3. Schematic Flow Diagram - For each major activity in which wastewater is or will be generated draw a diagram of the flow of materials, products, water, and wastewater from the start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum day volume of each wastestream [new facilities may estimate]. If estimates are used for flow, this must be indicated. Number each unit process having wastewater discharges to the community sewer. Use these numbers when showing these unit processes in the building layout in Section H.

Facilities that checked activities in question 1 of Section B are considered Categorical Industry Users and should skip to question 5.

4. For Non-Categorical Users Only: List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each of your processes or proposed processes. Include the reference number from the schematic flow diagram that corresponds to each process. [New facilities should provide estimates for each discharge].

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

ANSWER QUESTIONS 5 & 6 ONLY IF YOU ARE SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS

5. For Categorical Users: Provide the wastewater discharge flows for each of your processes or proposed processes. Include the reference number from the schematic flow diagram that corresponds to each process. [New facilities should provide estimates for each discharge]

No.	Regulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

<u>No.</u>	<u>Unregulated Process</u>	<u>Average Flow (GPD)</u>	<u>Maximum Flow (GPD)</u>	<u>Type of Discharge (batch, continuous, none)</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

<u>No.</u>	<u>Dilution</u>	<u>Average Flow (GPD)</u>	<u>Maximum Flow (GPD)</u>	<u>Type of Discharge (batch, continuous, none)</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

6. For Categorical Users Subject to Total Toxic Organic (TTO) Requirements:

Provide the following (TTO) information:

a. Does (or will) this facility use any of the toxic organics that are listed under the TTO standard of the applicable categorical pretreatment standards published by EPA?

- Yes
- No

b. Has a baseline monitoring report (BMR) been submitted which contains TTO information?

- Yes
- No

c. Has a toxic organics management plan (TOMP) been developed?

- Yes, (Please attach a copy)
- No

7. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current: Flow Metering Yes No N/A
 Sampling Equipment Yes No N/A

Planned: Flow Metering Yes No N/A
 Sampling Equipment Yes No N/A

If so, please indicate the present or future location of this equipment on the schematic flow diagram and describe the equipment below:

If flow metering equipment is not installed, will water use records or other method be used and be representative of discharged flow? Explain.

8. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Consider production processes as well as air or water pollution treatment processes that may affect the discharge.

No

Yes, then briefly describe these changes and their effects on the wastewater volume and characteristics: (Attach additional sheets if needed).

9. Are any materials or water reclamation systems in use or planned?

No

Yes, then briefly describe recovery process, substance recovered, percent recovered, and the concentration in the spent solution. Submit a flow diagram for each process: (Attach additional sheets if needed).

10. Are any other waste minimization measures used or planned?

No

Yes, then briefly describe measures.

SECTION F - CHARACTERISTICS OF DISCHARGE (refer to 40 CFR Part 403.12(b) for baseline monitoring report requirements).

1. DATA: Report organics and pesticides as ug/L; conventional pollutants and metals as mg/L; mass as lbs/day. All other units have been specified.

All current industrial users are required to submit monitoring data on all pollutants that are subject to categorical standards. Use the tables provided in this section to report the analytical results. DO NOT LEAVE BLANKS. For all other (non-regulated pollutants, indicate whether the pollutant is known to be present (P), suspected to be present (S), or known not to be present (O), by placing the appropriate letter in the concentration column under average of analyses. If data is available for non-regulated pollutants, please include, Indicate on the top of each table, or on a separate sheet, if necessary, the time, date, and place of sampling, the methods of analysis, the type of sample (i.e., flow proportional composite samples, time proportional composite samples or grab samples) and the number of representative samples taken. Be sure methods conforming to 40 CFR Part 136; if they do not indicate what method was used. A certification statement should also be provided on the table or additional sheet if necessary that such sampling and analysis are representative of normal work cycles and expected pollutant discharges to the POTW. A copy of a pollutant scan can be attached in lieu of completing the tables provided that all requested information is included on the scan.

New dischargers should use the table to indicate what pollutants will be present or are suspected to be present in proposed wastestreams by placing P (expected to be present), (may be present), or O (will not be present) in the concentration column under average of analyses. If the industry is Not yet in operation, the levels of the regulated pollutants and process flows should be estimated and reported.

When analyzing for pollutants listed in Georgia's Rules and Regulations for Water Quality Control, the applicant should ensure that the pollutants are at least analyzed down to the detection limits as specified in Attachment No. 1. If detection levels are not applicable for specific pollutants, so indicate by placing N/A under the column detection level used.

TABLE A - POLLUTANT SPECIFIC RESULTS

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses		Units	
		Conc.	Mass	Conc.	Mass			Conc.	Mass
Aconaphthene									
Acrolain									
Benzene									
Benzidine									
Carbon tetrachloride									
Chlorobenzene									
1, 2, 4 - Trichlorobenzene									
Hexachloroethane									
1, 2-Dichloroethane									
1,1,1-Trichloroethane									
Hexachloroethane									
1,1-Dichlorethane									
1,1,2-Trichloroethane									
1,1,2,2-Trichloroethane									
Chloroethane									
Bia(2-chloroethyl) ether									
2-Chloroethyl vinyl ether									

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
2-Chloronaphthalene								
2,4,6-Trichlorophanol								
Parachlorometa cresol								
Chloroform								
2-Chlorophenol								
1,2-Dichlorobenzene								
1,3-Dichlorobenzene								
1,4-Dichlorobenzene								
3,3-Dichlorobenzidine								
1,1-Dichloroethylene								
1,2-Trans-dichloroethylene								
2,4-Dichlorophenol								
1,2-Dichloropropane								
1,2-Dichloropropylene								
1,3-Dichloropropylene (Cis)								
1,3-Dichloropropylene (Trans)								
2-Methyl-4,6-Dinitrophenol								
3-Methyl-4-Chlorophenol								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
2,4-Dinitrotoluene								
2,6-Dinitrotoluene								
1,2-Diphenylhydrazine								
Ethylbenzene								
Fluoranthene								
4-Chlorophenyl phenyl ether								
4-Bromophenyl phenyl ether								
Bia(2-chloroisopropyl) ether								
Bia(2-chloroethoxy) methane								
Methylane chloride								
Methyl chloride								
Methyl bromide								
Bromoform								
Dichlorobromomethane								
Chlorodibromomethane								
Hexachlorobutadiene								
Hexachlorocyclopentadiene								
Isophorone								
Naphthalene								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Nitrobenzene								
Nitrophenol								
2-Nitrophenol								
4-Nitrophenol								
2,4-Dinitrophenol								
4,6-Dinitro-o-cresol								
N-nitrosodimethylamine								
N-nitrosodiphenylamine								
N-nitrosodi-n-propylamine								
Pentachlorophenol								
Phenol								
Bis(2-ethylhexyl) phthalate								
Butyl benzyl phthalate								
Di-n-butyl phthalate								
Di-n-octylphthalate								
Dimethyl phthalate								
Benzo(a)anthracene								
Benzo(a)pyrene								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
3,4-benzofluoranthene								
Benzo(k)fluoranthene								
Chrysene								
Acanaphthylene								
Anthracene								
Benzo(ghi)perylene								
Fluorene								
Phenanthrene								
Dibenzo(a,h)anthracene								
Indeno(1,2,3-cd)pyrene								
Pyrene								
Tetrachloroethylene								
Toluene								
Trichloroethylene								
Vinyl chloride								
Aldrin								
Dieldrin								
Chlordane								
4,4'-DOT								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
4,4'-DDE								
4,4'-DDD								
Alpha-endosulfan								
Beta-endosulfan								
Endosulfan sulfate								
Endrin								
Endrin aldehyde								
Heptachlor								
Heptachlor apoxide								
a-BHC-Alpha								
b-BHC-Beta								
d-BHC Delta								
PCB-1242								
PCB-1254								
PCB-1221								
PCB-1232								
PCB-1248								
PCB-1260								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
PCB-1016								
Toxaphene								
(TCDD)								
Asbestos								
Acidity mg(CaCO ₃)/L								
Alkalinity mg(CaCO ₃)/L								
Fecal Coliform Bacteria (#/100 ml)								
Chloride								
Chlorine								
Flouride								
Hardness mg(CaCO ₃)/L								
Magnesium								
NH ₃ -N								
TOC								
Kjeidahl N								
Nitrate N								
Nitrite N								
Organic N								
Orthophosphate P								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Phosphorus								
Lindane (Hexachlorocyclohexane (g-BHC-Gamma)l								
Sodium								
Specific Conductivity Φ mhos/cm								
Sulfate (SO ₄)								
Sulfide (S)								
Sulfite (SO ₃)								
Antimony								
Arsenic								
Barlum								
Beryllium								
Cadmium								
Chromium (Total)								
Chromium VI								
Copper								
Cyanide								
Lead								
Mercury								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Nickel								
Selenium								
Silver								
Thallium								
Zinc								
Methoxychlor								
2,4-Dichlorophenoxy proplanic acid (TP Silvex)								

TABLE B - PROHIBITED POLLUTANTS

Complete this table by checking the appropriate column and providing analytical results when indicated (P = known to be present, S = suspected to be present, O = known not to be present):

<u>Pollutant</u>	<u>P</u>	<u>S</u>	<u>O</u>
1. Materials that may create a fire or explosion hazard, including wastestreams with a closed cup flash point of less than 140°F or 60°C using test methods in 40 CFR Part 261.21.	_____	_____	_____
Flash point (°F or °C)			
2. Corrosive type materials pH < 5 or pH > 9	_____	_____	_____
pH (std. units)			
3. Solid or viscous pollutants in amounts which could cause flow obstruction or interference with POTW operation.	_____	_____	_____
4. Discharge of any pollutant (Including BOD ₅ , Suspended Solids, COD, etc.) in volume or strength to cause POTW unit process upset or NPDES Permit violations.	_____	_____	_____
BOD ₅ (mg/L)			
COD (mg/l)			
Suspended Solids (mg/L)			
Oil and Grease (mg/L)			
5. Heated discharges in excess of 104°F or 40°C	_____	_____	_____
Temperature (°F or °C)			

TABLE B (continued)

<u>Pollutant</u>	<u>P</u>	<u>S</u>	<u>O</u>
6. Petroleum oil, non-biodegradable cutting oil or products of mineral oil origin that cause POTW upsets or permit violations.	_____	_____	_____
7. Pollutants which result in presence of toxic gases, vapors or flumes in a quantity that may cause acute worker health and safety problems.	_____	_____	_____
8. Any trucked or hauled pollutants to discharge points on the POTW system.	_____	_____	_____

2. HAZARDOUS WASTES DISCHARGED TO A POTW SEWER SYSTEM (see 40 CFR 403.12(p) for requirements of hazardous waste notification):

a. Do you now discharge listed or characteristic hazardous wastes as specified in 40 Part 261 to a POTW sanitary sewer system?

No

Yes (if answer is YES complete the following).

(i) Name of the hazardous waste as set forth in 40 CFR Part 261

(ii) EPA hazardous waste number _____

(iii) Type of discharge to the sewer (continuous, batch, or other)

(iv) A certification should be provided below that you have a program in place to regulate the volume and toxicity of hazardous wastes generated to the extent determined to be economically practical.

(v) Describe the program components:

b. Do you discharge more than 100 kilograms of hazardous waste per calendar month to the POTW sewer?

No

Yes (if the answer is YES report the following).

(i) An identification of the hazardous constituents contained in the hazardous waste as specified in 40 CFR Part 261. _____

(ii) An estimation of the mass and concentration of the constituents in the wastestream discharged during the calendar month.

(iii) _____
An estimation of the mass of constituents in the wastestream expected to be discharged during the next 12 months. _____

c. Have you had to submit a hazardous waste notification (to the POTW that you discharge to based on the requirements of 40 CFR Part 403.12(p))?

- No
 Yes (if Yes provide the POTW name, address and date of notification).

SECTION G - TREATMENT

1. Is any form of wastewater treatment practiced at this facility?

- Yes
 No

2. Is any form of wastewater treatment (or changes to existing wastewater treatment) planned for this facility within the next three years?

- Yes, describe: _____
 No

3. Treatment devices or processes used or proposed for treating wastewater or sludge (check as many as appropriate).

- Air flotation
 Centrifuge
 Chemical precipitation
 Chlorination
 Cyclone
 Filtration
 Flow equalization
 Grease or oil separation, type: _____
 Grease trap
 Grinding filter
 Grit removal
 Neutralization, pH correction
 Ozonation
 Reverse osmosis

- Screen
- Sedimentation
- Septic tank

- Solvent separation
- Spill protection
- Sump
- Biological treatment, type: _____
- Rainwater diversion or storage
- Other chemical treatment, type: _____
- Other physical treatment, type: _____
- Other type: _____

4. Description

Describe the pollutant loadings, flow rates, design capacity, physical size, and operation procedures of each treatment facility checked above (attach additional sheets if necessary).

5. Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by-product disposal method, waste and by-product volumes, and design and operating conditions.

6. Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.

7. Do you have a treatment plant operator? No Yes
(if Yes):

Name: _____
Title: _____
Phone: _____
Full time: _____ (specify hours)
Part time: _____ (specify hours)

8. Is the treatment plant operator certified? No Yes
(if Yes):

Certification type: _____
Certification date and number: _____

SECTION H - FACILITY OPERATIONAL CHARACTERISTICS

1. Indicate whether the facility discharge is:

Continuous through the year, or

Seasonal - Circle the months of the year during which the business activity occurs:

J F M A M J J A S O N D

COMMENTS: _____

2. Does operation shut down for vacation, maintenance, or other reasons?

No

Yes, indicate reasons and period when shutdown occurs:

3. List types and quantity of raw materials, catalysts, intermediates and other chemicals use or planned for use (attach list if needed).

Chemical	Quantity
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

4. Building Layout - Draw to scale the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram in Section E-3), public sewers, and each facility sewer line connect to the public sewers. Number each sewer.

A blueprint or drawing of the facilities showing the above items may be attached in lieu submitting a drawing.

SECTION I - SPILL PREVENTION

1. Do you have chemical storage containers, bins, or ponds at your facility? No Yes

If “yes”, please give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of the containers to a sewer or storm drain. Indicate if buried metal containers have cathodic _____ protection.

2. Do you have floor drains in your manufacturing or chemical storage area(s)? No Yes
 if “yes”, where do they discharge to?

3. If you have chemical storage containers, bins, or ponds in manufacturing area, could accidental spill lead to a discharge to: (check all that apply).

- an on-site disposal system
- public sanitary sewer system (e.g. through a floor drain)
- storm drain
- to ground
- other, specify: _____
- not applicable, no possible discharge to any of the above routes

4. Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or spill discharges from entering the Authority’s collection system?

- No
- Yes
- N/A, not applicable since there are no floor drains and/or the facility discharge(s) only domestic wastes.

SECTION J - NON-DISCHARGED WASTES

1. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?

- No, skip the remainder of Section J
- Yes, please describe below (attach additional sheets if necessary)

<u>Waste Generated</u>	<u>Quantity (per year)</u>	<u>Disposal Method</u>	<u>Treatment Facility On-site/Off-site</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

2. If any of your wastes identified in No. 1 are sent to an off-site centralized waste treatment

facility, identify the facility's name and location

3. If an outside firm removes any of the waste, described in No. 1 above, state the name(s) and address of all waste haulers:

a. _____

Permit No. (if applicable):

b. _____

Permit No. (if applicable): _____

4. If any wastes are stored on site for greater than ninety (90) days, provide the following:

Method: drum, roll-off container, tank, lagoon,

other (specify)

Typical length of time waste stored: days weeks months

Typical volume of waste stored: tons gallons

Is storage site self-contained? Yes No

Surface drainage collection: Yes No

5. Have you been issued any Federal, State, or local environmental permits?

No

Yes

If "yes", please list the permit(s): _____

6. In the event of discharge to storm sewer or surface water, has an NPDES Permit been applied for?

- No
- Yes

If “yes”, please indicate the permit number or application date:

SECTION K - AUTHORIZED SIGNATURES

Compliance Certification:

1. Are all applicable Federal, state or local pretreatment standards and requirements being met on a consistent basis?

- No
- Yes
- Not yet discharging

2. If NO:

- a. What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.
- b. Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note that if the Georgia Environmental Protection Division issues a permit to the applicant, it may establish a schedule for compliance different from the one submitted by the facility.

Milestone Activity	Completion Date
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Authorized Representative Statement

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 fines and/or imprisonment for knowing violations.

Name(s)

Title

Signature

Date

Phone

PRIORITY POLLUTANTS

As of November 7, 2006

<u>CHEMICAL CONSTITUENTS</u>	<u>DETECTION LIMIT</u>	<u>CHEMICAL CONSTITUENTS</u>	<u>DETECTION LIMIT</u>
Methoxychlor	0.3 ug/L	3,4-Benzofluoranthene	10 ug/L
2,4-Dichlorophenoxyacetic acid (2,4-D)	5 ug/L	Benzo(gh)Parylane	10 ug/L
2,4,5-Trichlorophenoxy propiorac acid (TP Silvex)	10 ug/L	Benzo(k)Fluorethene	10 ug/L
Antimony	50 ug/L	Bia(2-Chloroethoxy) Methane	10 u g/L
Arsenic	30 ug/L	Via(2-Chloroethyl)Ether	10 u g/L
Baryllium	10 ug/L	Bia(2-Chloroiosopropyl)Ether	10 ug/L
Cadmium	10 ug/L	Bia(2-Ethy(hexyl)Phthalate	10 ug/L
Chromium (Total)	10 ug/L	4-Bromophenyl Phenyl Ether	10 ug/L
Chromium (VI)	10 ug/L	Butylbenzyl Phthalate	10 ug/L
Copper	20 ug/L	2-Chloronaphthalene	10 ug/L
Lead	25 ug/L	4-Chlorophenyl Phenyl Ether	10 ug/L
Mercury	0.5 ug/L	Chrysene	10 ug/L
Nickel	20 ug/L	Dibenzo(a,h)Anthracene	10 ug/L
Selerium	40 ug/L	1,2-Dichlorobenzene	10 ug/L
Silver	10 ug/L	1,3-Dichlorobenzene	10 ug/L
Thallium	50 ug/L	1,4-Dichlorobenzene	10 ug/L
Zinc	20 ug/L	3,3-Dichlorobenzidine	20 ug/L
Cyanide	25 ug/L	Diethyl Phthalate	10u g/L
Acrolein	50 ug/L	Dimethyl Phthalate	10 u /L
Acrylonitnle	50 ug/L	Di-n-Butyl Phthalate	10 ug/L
Benzene	2 ug/L	2,4-Dinitrotoluene	20 ug/L
Bromoform (Tribromomethane)	10 ug/L	2,6-Dinitrotoluene	20 ug/L
Carbon Tetrachloride	2 ug/L	Di-n-Octyl Phthalate	10 ug/L
Chlorobenzene	10 ug/L	1,2-Diphenylhydrazine	10 ug/L
Chlorodibromomethane	10 ug/L	Fluoranthene	10 ug/L
Chloroethene	5 ug/L	Fluorene	10 ug/L

<u>CHEMICAL CONSTITUENTS</u>	<u>DETECTION LIMIT</u>	<u>CHEMICAL CONSTITUENTS</u>	<u>DETECTION LIMIT</u>
2-Chloroethylvinyl Ether	10 ug/L	Hexachlorobenzene	10 ug/L
Chloroform (Trichloromethane)	2 ug/L	Hexachlorobutadiene	10 ug/L
Dichlorobromomethane	10 ug/L	Hexachlorocyclopentadiene	10 ug/L
1,1-Dichloroethane	2 ug/L	Hexachloroethane	10 ug/L
1,2-Dichloroethane	2 ug/L	Indeno (1,2,3-cd)Pyrene	10 ug/L
1,1-Dichloro-ethylene	2 ug/L	Isophorone	10 ug/L
1,2-Dichloropropane	2 ug/L	Naphthalene	10 ug/L
1,3-Dichloropropylene (Cis)	2 ug/L	Nitrobenzene	10 ug/L
1,3-Dichloropropylene (Trans)	2 ug/L	N-Nitrosodimethylamine	10 ug/L
Ethylbenzene	2 ug/L	N-Nitrosodi-n-Propylamine	10 ug/L
Methyl Bromide (Bromomethane)	10 ug/L	N-Nitrosodiphenylamine	10 ug/L
Methylene Chloride	10 ug/L	Phenanthrene	10 ug/L
Methyl Chloride (Chloromethane)	10 ug/L	Pyrene	10 ug/L
1,1,2,2-Tetrachloroethane	2 ug/L	2,2,4-Trichlorobenzene	10 ug/L
Tetrachloroethylene	2 ug/L	Aldrin	0.1 ug/L
Toluene	2 ug/L	a-BHC-Alpha	0.1 ug/L
1,2-Trans-Dichloroethylene	2 ug/L	b-BHC-Beta	0.1 ug/L
1,1,1-Trichloroethane	2 ug/L	Lindane [Hexachloroeyelohexane (g-BHC-gamma)]	0.1 ug/L
1,1,2-Trichloroethane	2 ug/L	d-BHC-Delta	0.1 ug/L
Trichloroethylene	2 ug/L	Chlordane	0.5 ug/L
Vinyl Chloride	10 ug/L	4,4-DOT	0.2 ug/L
2-Chlorophenol	10 ug/L	4,4-DDE	0.2 ug/L
2,4-Dichlorophenol	10 ug/L	4,4-DDD	0.2 ug/L
2,4-Dimethylphenol	10 ug/L	Dialdrin	0.1 ug/L
2-Methyl-4, 6-Dinitrophenol (4,6-Dinitro-o-cresol)	50 ug/L	a-Endosulfan	0.5 ug/L
2,4-Dinitrophenol	50 ug/L	b-Endosulfan	0.5 ug/L
2-Nitrophenol	50 ug/L	Endosulfan sulfate	0.5 ug/L
4-Nitrophenol	50 ug/L	Endrin	0.2 ug/L

<u>CHEMICAL CONSTITUENTS</u>	<u>DETECTION LIMIT</u>	<u>CHEMICAL CONSTITUENTS</u>	<u>DETECTION LIMIT</u>
3-Methyl-4-Chlorophenol (Parachlorometa cresal)	10 ug/L	Endrin Aldahyde	0.2 ug/L
Pentachlorophenol	20 ug/L	Heptachlor	0.1 ug/L
Phenol	10 ug/L	Heptachlor Epoxide	0.1 ug/L
2,4,6-Trichlorophenol	10 ug/L	PC3-1242	1 ug/L
Acanaphthene	10 ug/L	PC3-1254	1 ug/L
Acanaphthylene	10 ug/L	PC3-1221	1 ug/L
Anthracene	10 ug/L	PC3-1232	1 ug/L
Benzidine	30 ug/L	PC3-1248	1 ug/L
Benzo(a)Anthracene	10 ug/L	PC3-1260	1 ug/L
Benzo(a)Pyrene	10 ug/L	PC3-1018	1 ug/L
		Toxschene	2 ug/L

FIGURE 5.2

Sample Permit

Permit No. 001

Jackson County Water & Sewerage Authority

Industrial Pretreatment Program

Industrial Wastewater Discharge Permit

Pursuant to the Federal Pretreatment Standards as set forth in 40 CFR Part 403, and the State of Georgia Rules and Regulations for Water Quality Control (Chapter 391-3-6),

Name of SIU

is authorized to discharge wastewater from a facility located at

SIU address

to the JCWSA Wastewater Treatment Plant in accordance with effluent limitations, monitoring requirements, and other conditions or requirements set forth herein.

This permit shall become effective on _____.

This permit and the authorization to discharge shall expire at midnight,

_____.

Signed this _____ day of _____, 20__.

Authority Manager

**Jackson County Water & Sewerage Authority
Sewer Department
Industrial Pretreatment Program**

A. EFFLUENT LIMITATIONS

1. Effective throughout permit duration, the permittee is authorized to discharge process wastewater to the Jackson County Water and Sewerage Authority sewer system from the outfalls listed below:

<u>Outfall Location Description</u>	<u>Specific Sample</u>
001(<i>describe outfall location specifically such as the third manhole in the west parking lot or the effluent from the pretreatment system.</i>)	

2. Effective through permit duration, the discharge from the outfall(s) described above shall not exceed the effluent limitations indicated by the table labeled Effluent Limitations and Monitoring Requirements. In accordance with Section 6-15 of the Sewer Use Regulations, a monetary surcharge will be assessed for all exceedances above those listed in the surcharge table listed on page 3 of this permit. Any exceedances 2.5 times greater than those listed on the surcharge table will be considered in non-compliance with this permit and be subject to a written notice of violation with a fine of up to \$1,000.00 per day and subject to all enforcement actions necessary to correct the violation as described in Section 2 of the Sewer Use Regulation.

The amount of the surcharge shall reflect the cost incurred by the Authority in handling the excess oxygen demand, ammonia, total inorganic phosphates, and floatable oil and grease. This surcharge shall include a proportionate of charges for maintenance and operation of the wastewater treatment facilities including depreciation and other incidental expenses.

Surcharge Formula

When the concentrations of the parameters in the Surcharge Table exceed the values of the constituents as set forth therein, the excess concentrations shall be subject to a surcharge in the amount derived in accordance with the following formula:

$$\text{Surcharge, \$/month} = P \times G \times 8.34 \times C$$

Where:

P is the excess monthly average concentration in mg/L of the parameter (COD, inorganic phosphates, etc.) being evaluated; i.e. the actual monthly average concentration less the allowable monthly average concentration listed in the Surcharge Table would be in excess.

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G is equal to the user’s monthly wastewater flow in millions of gallons.

8.34 is a conversion factor.

C is equal to the unit cost in dollars per pound (\$/lb) for the treatment of the surcharged parameters. This value shall be established by the Wastewater Operations Manager based on actual wastewater treatment costs which shall be revised from time to time as necessary.

SURCHARGE TABLE	
Parameter	Monetary surcharge applied above this concentration
BOD ₅ -or-	300
COD	600
Total ammonia nitrogen	30
Total inorganic phosphates	15
Floatable oil and grease	100

3. The permittee shall comply with the following prohibited discharge standards:
 - a. No user shall introduce or cause to be introduced into the POTW any pollutant or wastewater that causes pass through or interference. These general prohibitions apply to all users of the POTW whether or not they are subject to categorical pretreatment standards or any other National, State, or local pretreatment standards or requirements.
 - b. No user shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:
 1. Pollutants which create fire or explosive hazard in the POTW, including, but not limited to, waste streams with a closed-cup flashpoint of less than 140°F (60°C) using the test methods specified in 40 CFR 261.21;
 2. Wastewater having a pH less than 5.5 or more than 9.5, or otherwise causing corrosive structural damage to the POTW or equipment;

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3. Solid or viscous substances in amounts which will cause obstruction of the flow in the sewer system or POTW resulting in interference;
4. Pollutants, including oxygen-demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;
5. Wastewater having a temperature greater than 150°F (65°C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104°F (40°C);
6. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;
7. Pollutants which result in the presence of toxic gases, vapors or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
8. Trucked or hauled pollutants, except at discharge points designated by the Wastewater Operations Manager in accordance with the Authority's Regulations.
9. Noxious or malodorous liquids, gases, solids or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair;
10. Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating the Authority's NPDES permit;
11. Wastewater containing any radioactive wastes or isotopes except in compliance with applicable State or Federal regulations;
12. Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water, and unpolluted wastewater, unless specifically authorized by the Wastewater Operations Manager;

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13. Sludges, screenings, or other residues from the pretreatment of industrial wastes;
14. Medical wastes, except as specifically authorized by the Wastewater Operations Manager in a wastewater discharge permit;
15. Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity testing parameters;
16. Detergents, surface-active agents, or other substances which may cause excessive foaming in the POTW;
17. Fats, oils, or greases of animal or vegetable origin in concentrations greater than 250 mg/L;
18. Wastewater causing two readings on an explosion hazard meter at the point of discharge into the POTW, or at any point in the POTW, of more than five percent (5%) or any single reading over ten percent (10%) of the Lower Explosive Limit of the meter.

Pollutants, substances, or wastewater prohibited by this section shall not be processed or stored in such a manner that they could be discharged to the POTW.

4. All discharges shall comply with all other applicable laws, regulations, standards, and requirements contained in any applicable State and Federal pretreatment laws, regulations, standards and requirements including any such laws, regulations, standards and requirements that may become effective during the term of this permit.
5. Dilution prohibited. No user shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable pretreatment standard or requirement.

B. MONITORING AND REPORTING

1. Effective throughout permit duration, the permittee shall monitor Outfall 001 for the following:

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					
Parameter	Discharge Limitations mg/l unless otherwise specified		Monitoring Requirements		
	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type	Sample Location

Notes:

(1) Minimum and maximum daily values for pH shall be reported to the Authority in the monthly report. Hourly data shall be kept on file by the permittee for review by the Authority.

(2) The permittee shall submit a detailed procedure for measuring the effluent toxicity of each batch discharge. This procedure, when accepted by the Authority, shall become a part of this permit by reference. No batch may be discharged unless the discharge is found not to exhibit toxicity.

(3) The pH shall be adjusted by a pretreatment system that shall maintain effluent pH levels between 5.5 and 9.5.

2. **Representative Sampling**
Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. Samples shall be taken on a day when the monitored substances are likely to be present in their maximum concentration.

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3. Definitions and Special Conditions.

- a. The 30 day average concentration (mg/L) is the arithmetic mean of values for all samples analyzed during any consecutive 30 day period.
- b. The daily maximum concentration (mg/L) is the largest value representative of any 24 hour sampling period during a given consecutive 30 day period.
- c. A composite sample shall consist of samples collected at intervals not less frequently than every two hours for a period of 24 hours or for the actual time the pretreatment facility is discharging (if less than 24 hours), and composited according to flow.
- d. Where sampling is less frequent than once per 30 days, the 30 day average limitation will apply and the result or arithmetic mean of the results will be reported as the 30 day average.
- e. All samples shall be collected and preserved in accordance with the procedures established in 40 CFR Part 136 and amendments.

4. Test Procedures

All pollutant analyses, including sampling techniques, to be submitted as part of a wastewater discharge permit application or report shall be performed in accordance with the techniques prescribed in 40 CFR Part 136, unless otherwise specified in an applicable categorical pretreatment standard. If 40 CFR Part 136 does not contain sampling or analytical techniques for the pollutant in question, sampling and analyses must be performed in accordance with procedures approved by EPA.

5. Recording Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The date, exact place, method, and time of sampling and names of the person or persons taking the samples;
- b. The date's analyses were performed;

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- c. The name of the person(s) who performed the analysis;
- d. The analytical techniques/methods used; and
- e. The results of such analyses.

6. Reporting

Monitoring results obtained for the reporting period each month shall be summarized and reported to the Authority once a month. The reports shall be postmarked no later than the 15th of the first month following the reporting period.

All user reports must be signed by an authorized representative of the user and contain the following certification statement:

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.

Signed copies of all reports required herein shall be submitted to the following address:

Jackson County Water & Sewerage Authority
Attn: Wastewater Operations Manager
P.O. Box 869
Jefferson, Georgia 30549

7. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the reporting of values. Such increased monitoring frequency shall also be indicated. The Authority may require more frequent monitoring or the monitoring of other pollutants not required in this permit by written notification.

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8. Automatic Re-sampling

If sampling performed by a user indicates a violation of the permit, the permittee must notify the Wastewater Operations Manager within twenty-four (24) hours of becoming aware of the violation. The user shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Wastewater Operations Manager within thirty (30) days after becoming aware of the violation. The user is not required to resample if the Authority monitors at the user's facility at least once a month, or if the Authority samples between the user's initial sampling and when the user receives the results of this sampling.

9. Accidental Discharge Report

- a. In the case of any discharge, including, but not limited to, accidental discharges of substances prohibited under Section A.3. of this permit, or slug loads or spills that may enter the public sewer, that may cause potential problems for the POTW, the user shall immediately telephone and notify the Wastewater Operations Manager of the incident. This notification shall include the location of the discharge, type of waste, concentration and volume, if known, and corrective actions taken by the user.
- b. Within five (5) days following such discharge, the user shall, unless waived by the Authority Manager, submit a detailed written report describing the cause(s) of the discharge. The report shall specify:
 - (1) Description and cause of the upset, slug load or accidental discharge, the cause thereof and the impact on the permittees compliance status. The description should also include location of discharge, type, concentration and volume of waste.
 - (2) Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.

- (3) All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

Such notification shall not relieve the user of any expense, loss, damage, or other liability which may be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the user of any fines, penalties, or other liability which may be imposed pursuant to this regulation.

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- c. A notice shall be permanently posted on the user's bulletin board or other prominent place advising employees whom call in the event of a discharge described in paragraph 1, above. Employers shall ensure that all employees, who may cause such a discharge to occur, are advised of the emergency notification procedure.

10. Records Retention

Any permitted user subject to the reporting requirements established in this permit shall be required to retain for a minimum of three (3) years any records of monitoring activities and results (whether or not such monitoring activities are required) and shall make such records available for inspection and copying by the Authority, State, or EPA. This period of retention shall be extended during the course of any unresolved litigation regarding the permitted user, or when requested by the Authority, State of EPA.

11. Sampling Manhole.

In order to provide for accurate sampling and measurement of industrial wastes, the industrial user shall provide and maintain, on each of its industrial waste outfall sewers, a large manhole or sampling chamber to be located outside the plant. If inside the plant fence, there shall be a gate near the sampling manhole with a key furnished to the Authority. There shall be ample room provided in each sampling manhole to enable convenient inspection and sampling by the Authority or its Agent. In certain sampling manholes where noxious fumes may accumulate, the Authority may require a fume exhaust system to protect the life and health of the Authority employees who are required to enter the sampling manhole. The fume exhaust system should extract the fumes from the bottom of the manhole and provide not less than one air change per minute. The manhole shall include a waterproof 120VAC, single phase electrical outlet at or near the installation.

C. MANAGEMENT REQUIREMENTS

1. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

2. Slug Discharge Plan Requirements

At least once every two (2) years, the Wastewater Operations Manager shall evaluate whether each significant industrial user needs an accidental discharge/slug control plan. A slug

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discharge is any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge. The Wastewater Operations Manager may require any user to develop, submit for approval, and implement such a plan. Alternatively, the Authority may develop such a plan for any user. An accidental discharge/slug control plan shall address, at a minimum, the following:

- a. Description of discharge practices, including non-routine batch discharges;
- b. Description of stored chemicals;
- c. Procedures for immediately notifying the Wastewater Operations Manager of any accidental or slug discharge, including any discharge that would violate a prohibition under Section A.3., with procedures for follow-up written notification within (5) five days; and
- d. Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.

3. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering waters of the State or creating an adverse impact on the environment. Handling and disposal of such substances shall be in accordance with all applicable State and Federal regulations. Records must be maintained of the quantity (volume and concentration or mass) of such substances; the method of disposal; the location or site; and the date and time of disposal.

4. Reports of Changed Conditions

Each user must notify the Wastewater Operations Manager of any planned significant changes to the user's operations or system which might alter the nature, quality or volume of its wastewater at least thirty (30) days before the change.

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- a. The Wastewater Operations Manager may require the user to submit such information as may deemed necessary to evaluate the changed condition, including the submission of a wastewater discharge permit application.
- b. The Wastewater Operations Manager may issue a wastewater discharge permit under Section 6.4.7 of the Water and Wastewater System Resolution or modify any existing wastewater discharge permit under Section 6.5.4 of the Water and Wastewater Resolution in response to changed conditions or anticipated changed conditions.
- c. For purposes of this requirement, significant changes include, but are not limited to, flow increases of twenty-five percent (25%) or greater, and the discharge of any previously unreported pollutants.

D. RESPONSIBILITIES

1. Right of Entry

- a. Duly authorized employees and representatives of the Authority and authorized representatives of applicable Federal and State regulatory agencies bearing proper credentials and identification shall be allowed to enter all properties for the purpose of inspection, observation, measurement, sampling, and testing pertinent to discharges to the Authority Wastewater System.
- b. Duly authorized employees and representatives of the Authority are authorized to obtain information concerning character, strength and quantity of non-domestic wastewater which may have a direct bearing on the kind and source of discharge to the Authority wastewater system.

2. Toxic Pollutants

Notwithstanding paragraph 4 below, if a toxic discharge standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Federal Act for a toxic pollutant which is present in the discharge, and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic discharge standard or prohibition and the permittee so notified.

3. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Federal Act.

4. Local Ordinances

Nothing in this permit shall be construed to relieve the permittee from the responsibility of compliance with any local ordinance whose requirements are more stringent than those contained in this permit.

5. Wastewater Discharge Permit Transfer

Wastewater discharge permits may be transferred to a new owner or operator only if the permittee gives at least sixty (60) days advance notice to the Authority and the Wastewater Operations Manager approves the wastewater discharge permit transfer. The notice to the CWO must include a written certification by the new owner or operator which:

- a. States that the new owner and/or operator have no immediate intent to change the facility's operations and processes;
- 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.

Failure to provide advance notice of a transfer renders the wastewater discharge permit void as of the date of facility transfer.

6. Permit Reissuance and Modification

The user shall apply for permit reissuance a minimum of sixty (60) days prior to the expiration of the user's existing permit. The terms and conditions of the permit may be subject to modification by the Authority during the term of the permit as limitations or requirements as identified in subsection (c), above, are modified, conditions change, or other just cause exists. The user shall be informed of any proposed changes in his

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permit at least thirty (30) days prior to the effective date of change. Any changes or new conditions in the permit shall include a reasonable time schedule for compliance.

E. SCHEDULE OF COMPLIANCE

F. PENALTIES FOR NON-COMPLIANCE

1. Civil Penalties

- a. A user who has violated, or continues to violate, any provision of this wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall be liable to the Authority for a maximum civil penalty of \$1,000 per violation, per day. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation.
- b. The Authority may recover reasonable attorney fees, court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred by the Authority.
- c. In determining the amount of civil liability, the Court shall take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the user's violation, corrective actions by the user, the compliance history of the user, and any other factor as justice requires.
- d. Filing a suit for civil penalties shall not be a bar against, or a prerequisite for, taking any other action against a user.

2. Criminal Penalties

- a. A user who willfully or negligently violates any provision of this wastewater discharge permit, and order issued hereunder, or any provision of the Authority Regulations dealing with wastewater discharge requirements, shall, upon conviction, be guilty of a misdemeanor, punishable as provided in the Regulations.

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- b. A user who willfully or negligently introduces any substance into the POTW which causes personal injury or property damage shall, upon conviction, be guilty of a misdemeanor punishable as provided in the Authority's Regulations. This penalty shall be in addition to any other cause of action for personal injury or property damage available under State law.
- c. A user who knowingly makes false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to this code, wastewater discharge permit, or order issued hereunder, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this code shall, upon conviction, be guilty of a misdemeanor punishable as provided in the Authority's Regulations.

3. Recovery of Costs Incurred

In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or causing damage to or otherwise inhibiting the Authority's wastewater treatment system shall be liable to the Authority for any expense, loss, or damage caused by such violation or discharge. The Authority shall bill the permittee for the costs incurred by the Authority for treatment, cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation.

JAR/vmt/4386/W057205

FIGURE 5.3

SAMPLE INSPECTION FORM
INDUSTRIAL INSPECTION REPORT

Date _____

Industry Name: _____

Address: _____

Facility Official: _____

Inspector is to complete the following sections on each industry.

1. Manufacturing Facilities

1. Briefly describe the manufacturing/business activity.
2. Is there any wastewater generated? If yes, briefly describe the process generating the wastewater.
3. List the raw materials/chemicals that are used at the industry/business?
4. Are there floor drains in the manufacturing area? What do they drain to?
5. What are the potential pollutants resulting from this industry/business?
6. If pretreatment is needed and or practiced, does all process water flow to pretreatment?
7. Is the manufacturing area reasonably clean?
8. Are reasonable housekeeping practices followed to prevent unnecessary wastes for entering the sewer system?
9. List the primary cleaning materials used?

10. Does the facility practice any onsite water conditioning? (ie: deionization, softening, etc.)
11. Are there cooling towers, boilers? If yes, please specify any water treatment chemicals used.
12. Is cooling water contact or non-contact? Where does the water go? (ie: to waste treatment or directly to sewer or storm sewer?)
13. Are non-process wastewaters generated at this facility? If so, where does the discharge go? (Waste treatment, sanitary sewer, storm sewer?) If non process water is discharged to a storm sewer, does the facility have an NPDES permit for these discharges? List number.

2. Chemical Storage Areas

1. Types of storage container onsite: Circle all that apply.
Drums Totes Canisters Open Tanks Closed Tanks
Other: _____
2. Chemical state of materials. Circle all that apply.
Solid Liquid Gas
3. Are floor drains present in the chemical storage areas? Where do they drain to? If drainage is to sewer, what prevents any spills from entering the sewer system?

4. Are any of the chemicals listed as hazardous materials? List.

Description	Quantity
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

- 5. Is spill containment present for all storage tanks? Is it adequate?
- 6. Are any storm sewers located adjacent to outside storage areas? Where does the grade carry the rainfall?
- 7. Are any creeks or streams located adjacent to outside storage areas?
- 8. Are outside storage areas covered?
- 9. Are any incompatible chemicals stored in close proximity?
- 10. Does the facility have a Spill Prevention, Control and Countermeasure Plan? Describe.
- 11. Any recent spills or chemical releases during the past twelve months? If yes, provide details.

3. Hazardous Waste Storage and Disposal

1. Is any hazardous waste generated at this facility? Circle all that apply.

Flammable Corrosive Reactive Toxic

2. How is the hazardous waste stored? Is the storage area covered?

3. How long is the waste generally stored onsite?

4. Is the hazardous waste labeled?

5. List the chemicals/compounds that necessitate the waste being classified as hazardous.

Description	Quantity
_____	_____
_____	_____
_____	_____
_____	_____

6. Is their adequate spill prevention / containment in the area?

7. Does the facility have a hazardous waste manifest log?

4. Pretreatment Facility

1. Is any type of pretreatment practiced? If yes, briefly describe.

2. Is hazardous sludge produced? Include in Section II.

3. How is non-hazardous sludge disposed of?

4. Does pretreatment facility discharge continuously, or is it a batch discharge?

5. Are there any bypasses around pretreatment facility? Describe. Any bypasses during the last twelve (12) months?
6. Any influent monitoring?
7. What is the effluent pH?
8. Is the wastewater treatment plant operator certified?

5. Slug Loading and Batch Discharges

1. Does the facility have the potential to slug load the sanitary or storm sewers? If yes, explain.
2. Are there any process and/or storage tanks connected directly to the sanitary sewer? If yes, what type or chemicals are processed and/or stored? List.

Description	Quantity
_____	_____
_____	_____
_____	_____
_____	_____

3. Does the facility have a plan to prevent slug discharges of any contaminants? If yes, describe.
4. Are the personnel properly trained to prevent batch discharge of any contaminants? If no, explain.
5. List any chemicals and the quantities stored on-site that could be detrimental to the sewer system and the environment.

Description	Quantity
_____	_____
_____	_____
_____	_____
_____	_____

6. Sampling Point

1. Is the effluent sampling point representative of the process wastewaters generated at this facility? If no, explain.

2. Is there adequate security provided for any Control Authority samplers?

3. If any non-process waste streams are discharged from this facility, do they enter the sewer system upstream of the monitoring point?

7. Flow Monitoring

1. How is wastewater flow monitored (meter, weir, flume)? Are water use records? Is there continuous recording? Where is the meter located?

2. Are the logs and charts on file?

3. How often is the meter calibrated? Calibration records on file?

4. How frequently is the flow recorded?

8. Self Monitoring Procedures.

1. Types of samples collected? Grab Composite Both

2. Are samples properly preserved?

3. Where are the samples analyzed? If analyzed onsite, is the technician certified?

4. Are appropriate lab procedures employed for all required analysis? If no, which parameters are not properly monitored?

5. Are monitoring records on file for the last three (3) years?

9. Compliance Problems:

10. Comments:

Inspector: _____

Date: _____