

**TINICUM TOWNSHIP  
INDUSTRIAL PRETREATMENT PROGRAM  
IMPLEMENTATION PROCEDURES**

**A. Updating Industrial Waste Discharge Information**

As part of the development of its pretreatment program, Tinicum Township conducted an industrial user survey to identify and characterize the industrial users tributary to Tinicum Township's Wastewater Treatment Plant (TTWTP). In order to maintain and update its industrial user inventory, Tinicum Township will institute the procedures described in the remainder of this section.

*New Users*

Section III, Article 3, Paragraph 3.2 of Tinicum Township's Pretreatment Ordinance requires all significant industrial users (SIU) to obtain an Industrial Wastewater Discharge Permit prior to connecting to the sewer system tributary to TTWTP. Any non-residential establishment applying for permission to connect to Tinicum Township's sewer system must provide information to the Township by completing an Industrial Wastewater Discharge Permit. This Industrial Wastewater Discharge Questionnaire can be found in the Appendix. Tinicum Township is responsible for reviewing the form and determining whether the establishment meets certain criteria for the issuance of an Industrial Wastewater Discharge Permit. The criteria used by Tinicum Township for determining whether an establishment is a significant industrial user (SIU) and therefore require a discharge permit are:

- Discharges a total flow of 25,000 gallons or more of process wastewater per average work day;
- Discharges an organic load, in pounds of BOD<sub>5</sub> per average work day, of 5% or more of the average daily organic loading of the TTWTP;
- Is regulated by Categorical Standards; or
- Is determined by the Township to have the potential of adversely affecting the operation of the TTWTP, causing interference, pass-through, sludge contamination, or of violating any pretreatment regulation.

If the establishment meets any of the criteria listed above, the Township will require the establishment to pay a questionnaire filing fee with the completed questionnaire serving as the establishment's Industrial Wastewater Discharge Permit Application. Tincum Township will review the questionnaire and determine, on the basis of the information provided and the results of any subsequent site inspection, whether an Industrial Wastewater Discharge Permit approving connection to the sanitary sewer system and the discharge of the wastewater will be issued to the applicant. The permit may include requirements for monitoring, pretreatment, reporting, compliance schedules, or other conditions limiting or controlling the discharge of wastes into the sanitary sewer system. A copy of the standard Industrial Wastewater Discharge Permit form is included in the Appendix.

### *Existing Users*

As noted above, all SIUs must obtain an Industrial Wastewater Discharge Permit in order to contribute industrial or process wastewater to the sewer system. The permits issued by Tincum Township are valid for a one-year period. If the user wishes to continue to discharge after the expiration date of the permit, an updated Industrial Wastewater Discharge Questionnaire must be submitted to the Township for permit renewal. Upon receipt of a completed application, and if Tincum Township elects not to cancel the permit on or before its expiration date, a renewed permit will be issued for another one-year period. The terms and conditions of the permit may be subject to modification by Tincum Township during the term of the permit as limitations or requirements are modified or if just cause exists. Tincum Township will inform the user of any proposed changes to its permit at least 30 days prior to the effective date of the change.

Each permitted industrial discharger, as a condition of its permit, will be required to perform regular monitoring of its discharge and to report to Tincum Township on the results of this monitoring. In addition, Tincum Township will conduct at least one inspection per year of each permitted user to independently verify the industry's compliance with its permit.

Any permittee who contemplates a change in its method of operations or in its pretreatment facilities which will result in changes to the wastewater character, composition, volume or rate of flow, is required, as a condition of its permit, to notify Tincum Township at least 90 days

prior to such a change. Failure to report such changes constitutes a permit violation and could result in enforcement action against the permittee. If required by Tincum Township, the user must complete a new Wastewater Discharge Questionnaire and may be issued a new Industrial Wastewater Discharge Permit that reflects the proposed changes.

Industrial users which are not SIUs are not required to have an Industrial Wastewater Discharge Permit. However, if a user makes changes which result in the user meeting the definition of a SIU, Section III, Article 3, Paragraph 3.3 of Tincum Township's Pretreatment Ordinance requires the user to immediately, upon becoming aware such a change has occurred or 90 days prior to such a change if it is planned, to apply for an Industrial Wastewater Discharge Permit.

Tincum Township will annually update its industrial user survey to reflect the information obtained through Industrial Wastewater Discharge Questionnaires, and ongoing inspection and monitoring activities of permitted users. Tincum Township will also conduct a formal industrial user survey once every five years after adoption of its Pretreatment Ordinance to insure its industrial user inventory remains current. This information will be compiled using the EPA's Pretreatment Compliance and Monitoring Enforcement (PCME) Software.

#### **B. Notification to Industrial Users of Applicable Pretreatment Standards**

As new regulations are promulgated which affect industrial users, the Tincum Township Pretreatment Coordinator, who will notify the affected users of the revisions by certified mail. If a change is made to the pretreatment regulations that causes an existing, non-permitted industry to be classified as a Categorical Industry or SIU, the Tincum Township Pretreatment Coordinator will notify the industry of the regulations by certified mail. Tincum Township will also require the industry to obtain an Industrial Wastewater Discharge Permit within the time frame prescribed by the new regulations, as provided by Section III, Article 3, Paragraph 3.3 of Tincum Township's Pretreatment Ordinance.

Upon receiving approval from EPA of its list of SIUs, Tincum Township will, if it has not already done so, notify each user by certified mail of its status as a SIU and all requirements applicable to it as a result of such status.

### **C. Management of Monitoring Program Reports**

The Industrial Wastewater Discharge Permit issued to a SIU requires the user to submit regular self-monitoring reports to Tincum Township. The permit details the monitoring requirements of the SIU. All other reports that may be required by the permit or Section III, Article 3, Paragraphs 3.11, 3.12, and 3.13 of Tincum Township's Pretreatment Ordinance must also be provided to the Township.

Tincum Township will be responsible for enforcement action against all users tributary to the Tincum Wastewater Treatment Plant (TTWTP). As a monitoring report is received by Tincum Township, it will be registered in a Master Log, entered into the PCME database, and then reviewed by the Pretreatment Coordinator or, upon request, by Tincum Township's Solicitor or Consulting Engineer, for compliance with the user's permit conditions. A copy of the Master Log form is included in the Appendix. The Master Log to be used by the Tincum Township Pretreatment Coordinator will include the report due dates to enable the Coordinator to determine if the report is late. If the user's discharge is not in compliance, or if the user failed to submit a monitoring report, Tincum Township will initiate the appropriate enforcement action, as described in Article 4 of the Ordinance, for the user to get into compliance. The degree of enforcement action will be as listed in Tincum Township's Enforcement Response Plan included in the Appendix.

The monitoring report review process is shown graphically in Figure 1 in the Appendix. A Routine Compliance Report Review Checklist form to be used by the Tincum Township Pretreatment Coordinator to assist in the review of industrial monitoring reports and to record the compliance history of the industry is also included in the Appendix. In addition to completing the Review Checklist, the Pretreatment Coordinator will also compare the industry's report with all available Tincum Township data obtained during the reporting period. A summary table of previous monitoring data will be maintained in each permitted industry's monitoring file and by the PCME program. The Pretreatment Coordinator will compare the industry's monitoring results with previous results as a check for unusual data. If the monitoring information provided by the industry appears questionable, the Tincum Township Pretreatment Coordinator may conduct an unannounced sampling inspection of the industry to verify the submitted results.

The Tincum Township Pretreatment Coordinator will maintain a separate file for each industrial user. The file will include, as applicable, the user's Industrial Wastewater Discharge Questionnaire, Industrial Wastewater Discharge Permit, self-monitoring data, inspection reports, all correspondence, documentation of telephone calls and meetings, documentation of any enforcement actions, and current compliance status. All records will be maintained for at least three years and throughout the course of any ongoing litigation.

#### **D. Independent Monitoring**

The Tincum Township Pretreatment Coordinator will conduct at least one inspection per year of each permitted industry to independently verify the SIU's compliance with its permit and applicable pretreatment standards. The inspection will include, at a minimum, the collection of a sample of the SIU's wastewater discharge, the analysis of the sample for all the pollutants included in the SIU's permit monitoring requirements, and a complete tour of the SIU's facility to visually examine the site. Tincum Township will prepare a report of the inspection, including the results of all laboratory analyses.

Each year the Tincum Township Pretreatment Coordinator will evaluate for each SIU, using information obtained during the inspections and other information in its files, whether the user needs a plan to control slug discharges as defined in Section III of Tincum Township's Pretreatment Ordinance. If a slug control plan is needed, the plan will contain, as a minimum, the elements described in 40 CFR 403.8(f)(2)(v).

#### **E. Non-Compliance Procedures**

Non-compliance with conditions of an Industrial Wastewater Discharge Permit issued by Tincum Township are classified as follows:

##### *Type 1 Non-Compliance*

An emergency situation resulting from a discharge which would appear to present an imminent or substantial endangerment to the health or welfare of persons, to the environment, causes interference to the TTWTP or causes Tincum Township to violate any conditions of its NPDES Permit.

##### *Type 2 Non-Compliance*

A non-emergency situation resulting from a discharge exceeding the pollutant limitations contained in the user's permit, but not presenting an immediate

hazard to the health and welfare of persons or to the environment not causing interference to the TTWTP or not causing Tincicum Township to violate any conditions of its NPDES Permit.

*Type 3 Non-Compliance*

A non-emergency situation resulting from failure of the user to comply with reporting requirements, compliance schedules, or other permit conditions not directly related to the quality or quantity of pollutants discharged.

In those situations involving a Type 1 Non-Compliance, the Tincicum Township Pretreatment Coordinator will notify the SIU by telephone or in person, to immediately halt the discharge. In the event of a failure of the SIU to comply voluntarily with the suspension order, Tincicum Township will take such steps as it deems necessary, including immediate severance of the sewer connection, to prevent or minimize damage to the TTWTP or the collection system or endangerment to any individuals.

Immediately after notifying the SIU of the Type 1 Non-Compliance, Tincicum Township will begin monitoring, using the proper quality assurance/quality control techniques, to determine the extent of the discharge. The TTWTP operating staff will also begin monitoring at the plant to determine the impact of the discharge on the facility.

Generally, the urgency of the situation will determine the required response. Section III, Article 4, Paragraphs 4.1, 4.2, and 4.3 of Tincicum Township's Pretreatment Ordinance describes the procedures for severance and reinstatement of sewer service, and associated SIU reporting requirements.

As required by Section III, Article 4, Paragraph 4.4 of the Pretreatment Ordinance, if any type of non-compliance occurs, the Tincicum Township Pretreatment Coordinator will issue the SIU a Notice of Violation (NOV) by certified mail. The NOV will state the nature of the violation and may require a response from the SIU in the form of a plan, explanation, compliance schedule, or other appropriate response within a specified time period. Tincicum Township will follow the procedures in the Enforcement Response Plan, as referenced in Section III, Article 4, Paragraph 4.10 of the Pretreatment Ordinance. The Enforcement Response Plan will serve as a guide in applying remedies and penalties. Sections IV and V of the Pretreatment Ordinance describe the procedures for assessing penalties and applying remedies for the proper administration or enforcement of the Industrial Pretreatment Program.

## **F. Provisions for Public Participation**

Tinicum Township's Pretreatment Ordinance was passed on June 23, 1993 after a summary of the intent of the Ordinance was published at least thirty days prior to adoption. Tinicum Township considered written public comments received during this thirty day period as well as any comments received at its public meeting prior to adoption of the Ordinance. Any proposed future changes in the Pretreatment Ordinance or Tinicum Township's local limits will also be advertised at least thirty days before Tinicum Township takes action on the proposals at its public meeting. All written comments received during this thirty day period will be considered by Tinicum Township. Complete copies of the amended Ordinance or local discharge limits will be available upon request.

Generally, all documents and records relating to the quantities or controls imposed on the pollutants contained in the wastewater discharged by any permitted industrial user, including the permit, any compliance schedules or conditions contained in the permit, as well as all compliance monitoring reports, notices, and enforcement actions taken shall be open to the public for inspection during the normal business hours of the Township's Pretreatment Coordinator. Tinicum Township will follow a formal request procedure for public review of its pretreatment files. Anyone wishing to review pretreatment files will be required to sign a request form identifying the name and address of the person reviewing the file and which files are reviewed. If the person wants a copy of any file material, Tinicum Township will perform the copying at the expense of the person. All original files will be prohibited from being taken from Tinicum Township's offices. Guidelines relative to classified or confidential information are provided in Section III, Article 3, Paragraph 3.20 of Tinicum Township's Pretreatment Ordinance. Tinicum Township will review all material indicated as confidential information upon receipt to determine whether the information is entitled to confidential treatment.

If the information is determined to be treated as confidential, Tinicum Township will store the information in a separate locked file for the SIU. Access to this file will be limited to the Tinicum Township Pretreatment Coordinator and where appropriate, its professional consultants.

Tinicum Township will annually publish the names of SIUs who were in significant non-compliance at least once during the previous twelve months. The notification will also summarize any enforcement actions taken against these SIUs during the same twelve months.

Significant non-compliance is defined in Section II of Tincum Township's Pretreatment Ordinance.

Tincum Township may allow any SIU who causes or allows an unauthorized discharge to the sewer system to show cause before Tincum Township why a proposed enforcement action should not be taken. The transcripts of the testimony recorded at the hearing will be made available to any member of the public upon payment of the usual charges thereof. Similarly, any orders issued or enforcement actions taken against the SIU will also be a matter of public record.

Information related to pretreatment program activities and requirements will be discussed during Tincum Township's public meetings and recorded in the meeting minutes as applicable. Tincum Township will provide interested members of the public and any customer of the TTWTP a copy of the minutes, upon request and payment of applicable copying and mailing charges.

**TINICUM TOWNSHIP  
INDUSTRIAL PRETREATMENT PROGRAM  
INDUSTRIAL WASTE MONITORING PROGRAM**

**A. Program Description**

Tinicum Township's proposed pretreatment program will include the following types of monitoring activities:

- Scheduled Monitoring
- Unscheduled Monitoring
- Demand Monitoring
- Industrial Self-Monitoring

Scheduled monitoring will be performed, at a minimum, annually for each of the permitted industries. Included as an element of the scheduled monitoring activities will be on-site facilities inspection during which time the following observations and evaluations will be made:

- Existing pretreatment facilities will be observed relative to the condition of the treatment units and equipment, as well as for indications of improper activities such as dilution or by-passing.
- Existing manufacturing processes will be observed for any changes which could affect the wastewater discharged or warrant changes in the established Industrial Waste Discharge Permit conditions.
- Pretreatment or other monitoring records required by the Industrial Waste Discharge Permit to be maintained by the industry will be examined to ascertain compliance and to note the completeness and accuracy of the records.
- On-site laboratory facilities will be observed to determine whether the industry is following the proper procedures for wastewater sample analysis.
- Chemical storage facilities and manufacturing operations will be observed to determine if the industry needs a plan, if it does not have one, to control spills and slug discharges.

In conjunction with the on-site facilities inspection, wastewater sampling will be conducted by Tinicum Township and analyzed for the pollutants controlled or limited by the user's permit. The type of sample, composite or grab, will be the same as that required by the user's

permit. If desired, the sample may be split with the industry. Generally, all scheduled monitoring activities will be conducted with a 7 day advance notice to the industry and during periods of normal operation and waste discharge from the industry. The samples will be collected from the sampling manhole(s) designated in the user's Discharge Permit.

Unscheduled monitoring activities will be performed at a minimum annually, or on an "as-needed" basis without the benefit of advanced notice to the user. Monitoring activities conducted at this time will consist of collection of a sample of wastewater composited over the user's normal working hours and/or a grab, depending on the analysis parameters. Grab samples will be collected whenever pH, cyanide, residual chlorine, total phenol, oil and grease, sulfide, or volatile organics analyses are needed. The sample will be analyzed for the pollutants controlled by the industry's Discharge Permit.

Unscheduled monitoring will generally be conducted by Tincum Township if the information included in an industry's self-monitoring or compliance report is incomplete or the results in the report are significantly different than previous reports. Tincum Township may also conduct an unscheduled inspection if the industry fails to submit a required report or if the information included in the industry's report is not consistent with other sampling information available from the reporting period.

Demand (or investigative) monitoring activities will be performed by Tincum Township in response to operational difficulties experienced at the wastewater treatment plant, complaints by residential or other users of the sewer system, undesirable materials noted in the collection system or treatment plant, or changes noted relative to limiting sludge application rates (end use of the sludge). The monitoring activities conducted may include the collection of grab or composite samples for analysis, as well as on-site inspections as deemed appropriate by Tincum Township under the circumstances. Data thus obtained may be used as verification of a violation of Tincum Township's Pretreatment Ordinance or of the user's Industrial Waste Discharge Permit, and therefore may serve as support for enforcement actions against the user.

Tincum Township's Pretreatment Ordinance prohibits the discharge of materials to the sewer system with a closed-cup flashpoint of less than 140° F. If an industrial user has a potential to discharge explosive materials, the user's Industrial Waste Discharge Permit will require the

user to measure the closed-cup flashpoint of its discharge and include the results in its self-monitoring reports to Tinicum Township.

Each Significant Industrial User is required, as a condition of its Discharge Permit, to submit regular monitoring reports to Tinicum Township. These monitoring reports must include the results of all laboratory analyses performed by the user during the reporting period to verify compliance with its Discharge Permit. Section 3.13 of Tinicum Township's Pretreatment Ordinance describes the information required to be included in the user's report. All information obtained during an inspection will be placed in the users file and kept for a minimum of three years. The Appendix contains an example Industrial Inspection Report form that will be completed as part of the inspection.

#### **B. Sample Collection and Handling Procedures**

Sample collection, holding times, and preservation techniques practiced for all compliance monitoring activities will be performed in accordance with procedures established by EPA pursuant to Section 304(g) of the Clean Water Act and contained in 40 CFR Part 136, as amended. A Sampling Record form, as shown in the Appendix, will accompany each sample from the time of collection to the time of analysis. The results of the sample analyses will be logged into a personal computer using the EPA's PCME (Pretreatment Compliance and Monitoring Enforcement) software. A copy of the laboratory analysis report may be distributed to the user monitored and a copy will be retained by Tinicum Township for a minimum of three years.

Analysis of collected samples will be performed by a local contract laboratory for all parameters except pH, since the Township does not currently have the facilities or personnel to analyze the samples. Analyses for pH will be conducted during the inspections using a portable pH meter.

Tinicum Township will maintain an inventory of sampling equipment. Special sample bottles and preservatives are provided by the contract laboratory on an as-needed basis prior to sample collection. If emergency sampling is needed after the contract laboratory's business hours, Tinicum Township will obtain the necessary sample bottles and preservatives from the

WWTP. The collected samples will be properly stored, as needed, at the WWTP until the beginning of the next business day when Tinicum Township will deliver the samples to the contract laboratory for analysis. Arrangements can be made with the contract laboratory for immediate analysis of the delivered samples if conditions require Tinicum Township to have the results available sooner than the normal turn around time.

Tinicum Township will perform all sample collection needed as part of its pretreatment program inspection activities according to the following QA/QC procedures:

*Before Inspection*

- Clean and check all sample equipment for proper operation
- Calibrate all field equipment
- Contact the contract laboratory to obtain special sample bottles and preservatives. Confirm with laboratory required sample volumes.
- Review files and Industrial Waste Discharge Permit for sampling point and analysis parameters

*During Inspection*

- Collect samples from location(s) designated in user's Industrial Waste Discharge Agreement. These sites have been selected to obtain representative samples of the user's total process wastewater discharge.
- Collect same type of samples as specified in user's Industrial Waste Discharge Agreement. Samples collected for pH, cyanide, residual chlorine, total phenol, oil and grease, sulfide and volatile organics must be grab samples. All other samples should be composite samples collected with an automatic sampler during the user's discharge hours.
- Obtain measurements of wastewater flow, if available, at time of inspection.
- Thoroughly complete Sampling Record form.
- Split samples with industry representative if requested.
- Follow the proper sample preservation techniques as defined by contract laboratory. Verify the preservation techniques are in accordance with 40 CFR Part 136, as amended.

- Tightly close all sample containers and prevent access to samples by others.
- Deliver the samples to laboratory during same business day if possible.

Tinicum Township will use a Raytheon Laboratories, a local contract laboratory, for analysis of all wastewater samples. The laboratory is located in Boothwyn, Pennsylvania and currently performs certain wastewater analyses for Tinicum Townships NPDES Permit compliance reporting. The laboratory is a certified drinking water laboratory by the Pennsylvania Department of Environmental Resources.

Tinicum Township will have the contract laboratory sign a chain-of-custody form upon acceptance of the sample. Tinicum Township will also require that the contract laboratory must complete all analyses in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto. Where 40 CFR Part 136 does not contain analysis techniques, the contract laboratory will use methods approved by EPA. The laboratory has instituted extensive QA/QC protocol which it will use on all Tinicum Township pretreatment program samples. These include duplicate analyses, blank analyses, and spiked analyses.