IMPLEMENTING
BEST
MANAGEMENT
PRACTICES
IN
PERMITS



OUTLINE

Pretreatment Background Information

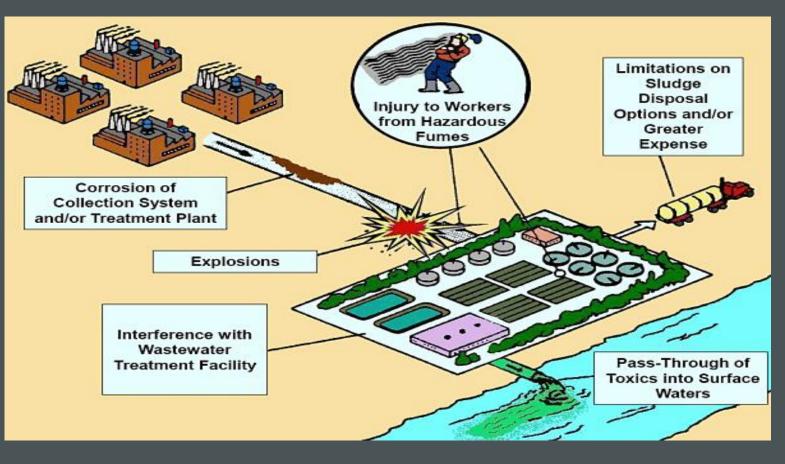
Streamlining Rule

Permitting

Best Management Practices

Takeaway Notes

WHY DO WE NEED PRETREATMENT





Sewer Overflows from Fats, Oils and Grease



POTWs designed to treat more than 5 MGD are required to have a program

If a POTW is required to have a program it will be listed within its discharge permit

Smaller POTWs that have significant industrial discharges coming to them

CONTROL MECHANISMS

What is a Control Mechanism?

- Also called a Permit
- A privilege, not a right.

What Does a Control Mechanism Do?

- Authorizes Discharges with Restrictions
- Specifies duties and obligations of the permittee
- Includes all applicable pretreatment standards and requirements
- Establishes legally enforceable terms

STREAMLINING RULE

Streamlining Rule was implemented in 2005

- What did the Streamlining Rule Change?
- The Streamlining Rule revised several provisions of the General Pretreatment Regulations (40 CFR Part 403).



STREAMLINING RULE CONT'D

Reducing the Burden on the Control Authority By:

- I. Allowing the Control Authority to authorize an Industrial User subject to categorical pretreatment standards to reduce sampling of a pollutant if the Industrial User demonstrated that a given pollutant is neither present nor expected to be present in the discharge.
- 2. It allows the Control Authority to authorize the use of equivalent concentration limits in lieu of flow-based mass limits for certain industrial categories (organic chemicals, plastics and synthetic fibers(OCPSF), petroleum refining and pesticide chemicals).
- 3. It allows the Control Authority to issue a general control mechanism to groups of Significant Industrial Users that are substantially similar.
- 4. Allows Control Authority to reduce oversight of certain Categorical Industrial Users based on percentage of contribution to the POTW; and
- 5. Allows Control Authority to reduce oversight of certain Industrial Users that may be reclassified as Non-Significant Categorical Industrial Users.

STREAMLINING RULE CONT'D

One of the best changes implemented was to allow POTWs/control authority to use best management practices (BMPs) as an alternative to numeric limits that are developed to protect the POTW as long as it continues to protect against pass-through or interference. In addition, the Rule requires that any applicable BMPs be included in the user's control mechanism, that selfmonitoring reports include BMP compliance information where applicable, and that documentation of compliance information for BMPs be maintained by the POTW and the user.



- Industrial User: means any User who discharges to the POTW any Wastewater Discharge resulting from processes employed in industry or manufacturing, or from development of any natural resources
 - Significant Industrial User: Takes up more than 5% loading of a POTW; or discharges 25,000 gpd or more
- Commercial User: means any property occupied by a nonresidential establishment not within the definition of an "Industrial User", and which is connected to the wastewater facilities.

WHO NEEDS A PERMIT



Industrial Users:

- They are a categorical user and/or an SIU and are subject to pretreatment standards and are required to have a permit.
- They take up more than 5% of the POTW loading rate.
- Subject to sampling requirements.

Commerical Users:

Subject to discharge regulations, but can be obtained through BMPs



PERMIT ISSUANCE PROCESS

Before a control authority can begin issuing individual permits it must have:

- Legal authority to do so via Ordinance, Rules and Regulations, or your POTW discharge permit.
- 2. Identify the user. Is it an industrial or commercial user? How do you determine?
 - a. Send out a survey? Review and determine if they need a permit.
 - b. Do a site visit.
 - c. Baseline monitoring.

TYPES OF USERS THAT WOULD REQUIRE AN INDUSTRIAL USER PERMIT

- Categorical or Significant Industrial Users
- Any Industrial User that requires pretreatment before discharge.
- Any User that may require strict monitoring of their discharge.

Examples:

Metal Finishers

Glass Manufacturer

Rubber Manufacturer

Food Processor

Airport Deicing Facility

TYPES OF COMMERCIAL USERS THAT MAY NEED A PERMIT, BUT ONLY REQUIRE BMP'S

FOOD SERVICE ESTABLISHMENTS (FOG PERMITS)

ANY PLACE WITH AN OIL/WATER OR OIL/GRIT SEPARATOR SUCH AS:

- Auto Dealerships or Collision Centers
- Local Public Works
- Fire Departments
- Car Washes

SMALL BREWERIES OR DISTILLERIES

DENTAL OFFICE

WHAT'S IN AN INDUSTRIAL USER PERMIT AND BMP PERMIT

York Sewer District

WASTEWATER DISCHARGE PERMIT XYZ GARAGE

Best Management Practices Permit

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YORK SEWER DISTRICT YORK, MAINE WASTEWATER DISCHARGE PERMIT

In accordance with the provision of the York Sewer District Regulations for Governing the Use of Public and Private Sewers (Rules and Regulations),

Facility Name ("Permittee"):

Physical Address:

Telephone Number

SIC or NAICS Code

EPA Categorical Use

Permit Number:

Permit Effective Date

Expires On:

is hereby authorized to discharge wastewater from the above identified facility and through the outfalls (discharge locations) identified herein into the York Sewer District Publicly Owned Treatment Works (POTW) in accordance with the conditions set forth in this Permit. Compliance with this Permit does not relieve the Permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State and federal laws, including any such regulations, standards, requirements or laws that may become effective during the terms of this Permit

Noncompliance with any of the terms and conditions of this Permit shall constitute a violation of the Rules and Regulations and shall be subject to the penalty provisions outlined therein and in this Permit.

Permit Issued By:

York Sewer District

Theresa Tucker, Regulatory Compliance Manager (Date)

Attachments to this Permit

 York Sewer District Regulations for Governing the Use of Public and Private Sewers – York Sewer District Rates (BOD, TSS and FOG Surcharges basis)

Industrial Wastewater Discharge Permit No. 003 York Sewer District

Effective Date

YORK SEWER DISTRICT

WASTEWATER DISCHARGE PERMIT XYZ Restaurant

Best Management Practices Permit for Fats, Oils and Grease (FOG)

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WHAT ARE THE TWO TYPES OF BMPS?

BMPs can be divided into two different types:

General BMPs: These are referred to as baseline practices and typically low in cost and easily implemented. Common general BMPs include:

- Good Housekeeping
- Preventative Maintenance
- Employee Training

Facility Specific BMPs: These will vary from site-to-site depending upon industrial process and pollutants.

EXAMPLES OF BMPS YOU MIGHT USE

For Brewery or Distillery:

Spent Grain Storage

For a Dental Office:

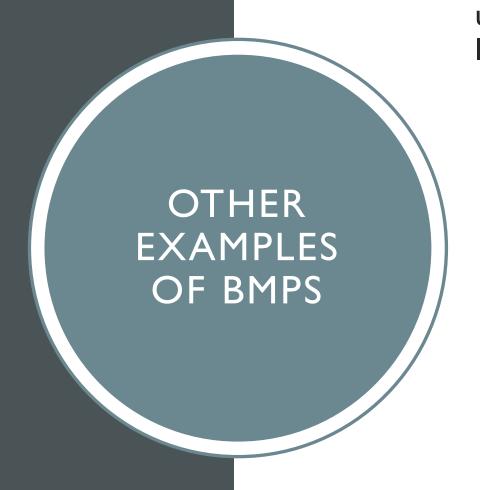
Cleaning of Amalgam Separator Replacing and Cleaning Frequency

For an Auto Repair Facility:

Cleaning frequency of oil/grit/water separator
Storage of Chemicals
Frequency of Washing

For a Food Service Establishment:

Cleaning frequency of grease interceptor Screens in Drains Scraping of Dishes



BMPs can be used as local limits, if the practices being used protect against Pass Through and/or Interference.

Example: A BMP can be used if you have an IU that is a low-flow discharger and a representative sample can't be made, such as someone that may recycle their production water; or

The BMP is the most economically feasible method for regulating the pollutant of concern, such as a BMP local limit for mercury at a dental office.

TAKEAWAY NOTES

- BMPs can be put into a full industrial user permit under Special Conditions if you want to add specific housekeeping items.
- All BMPs (per the 2005 Streamlining Rule) if adopted by the municipality or POTW <u>are federally enforceable</u> <u>standards</u>.
- BMPs can be an effective way to manage industrial discharges when appropriate.
 When applied correctly they can reduce the regulatory burden on Control Authorities.



QUESTIONS?

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