

working for clean rivers

Components of an Industrial User Fact Sheet

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ENVIRONMENTAL SERVICES
CITY OF PORTLAND

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PRETREATMENT 101

INDUSTRIAL (in-dūś trē-əl)

USER (yūz'ər)

FACT (făkt) SHEET (shēt)

Module 1.01

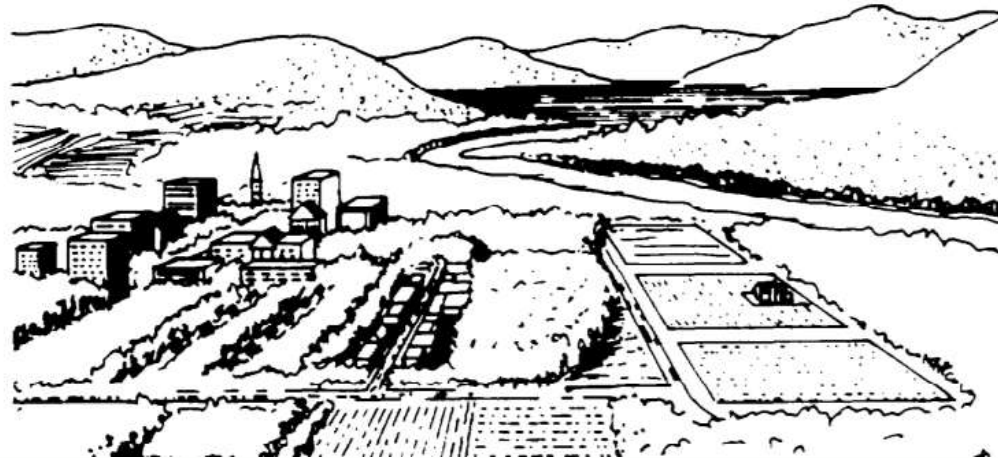


A Brief Unauthorized
History of the
Industrial User Fact
Sheet





Guidance Manual for POTW Pretreatment Program Development





Guidance Manual for POTW Pretreatment Program Development

“Where the term “must” is used, refer to a regulatory requirement. The term “should” denotes recommended good practice, but you do not have to abide by this practice in order to meet regulatory requirements if you have an acceptable alternative.”



3.1.3 Control Mechanism

“the POTW must have the authority to control, through permit, contract, order, or similar means, the contribution to the POTW from each IU to ensure compliance with applicable pretreatment standards and requirements.”

work for controlling the volume and constituents discharged by an industry.



§ 403.8 Pretreatment Program Requirements: Development and Implementation by POTW.

(a) *POTWs required to develop a pretreatment program.* Any POTW (or combination of POTWs operated by the same authority) with a total design flow greater than 5 million gallons per day (mgd) and receiving from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW or are otherwise subject to Pretreatment Standards will be required to establish a POTW Pretreatment Program unless the NPDES State exercises its option to assume local responsibilities as provided for in §403.10(e). The Regional Administrator or Director may require that a POTW with a design flow of 5 mgd or less develop a POTW Pretreatment Program if he or she finds that the nature or volume of the industrial influent, treatment process upsets, violations of POTW effluent limitations, contamination of municipal sludge, or other circumstances warrant in order to prevent Interference with the POTW or Pass Through.

(c) *Incorporation of approved programs in permits.* A POTW may develop an appropriate POTW Pretreatment Program any time before the time limit set forth in paragraph (b) of this section. The POTW's NPDES Permit will be reissued or modified by the NPDES State or EPA to incorporate the approved Program as enforceable conditions of the Permit. The modification of a POTW's NPDES Permit for the purposes of incorporating a POTW Pretreatment Program approved in accordance with the procedure in §403.11 shall be deemed a minor Permit modification subject to the procedures in 40 CFR 122.63.

(d) *Incorporation of compliance schedules in permits.* [Reserved]

(e) *Cause for reissuance or modification of Permits.* Under the authority of section 402(b)(1)(C) of the Act, the Approval Authority may modify, or alternatively, revoke and reissue a POTW's Permit in order to:

(1) Put the POTW on a compliance schedule for the development of a POTW Pretreatment Program where the addition of pollutants into a POTW by an Industrial User or combination



 **EPA Industrial User
Permitting Guidance
Manual**

11. DOCUMENTATION OF PERMIT DECISIONS
11.1 FACT SHEET
11.2 PERMIT RECORD





EPA Industrial User Permitting Guidance

“During program audits, Approval Authorities found that nearly one half of local Control Authorities were issuing inadequate or incomplete control mechanisms. EPA believes that individual industrial user permits are the most effective control mechanism available.”



11.1 FACT SHEET

“The fact sheet briefly sets forth the significant factual, legal, procedural, and policy questions considered in preparing the permit.”



An Industrial User Fact Sheet is a narrative explanation of the IU Discharge Permit. The IU Fact Sheet explains to the regulator; who is being permitted, what is being permitted, why is it being permitted, what are the permit requirements, and why are they required.



CHAPTER 11. DOCUMENTATION OF PERMIT DECISIONS

“After the permit has been drafted, the permit writer should create a permanent record of the procedures followed and the basis for the decisions made during the permitting process.”



11.2 PERMIT RECORD

It is particularly important for the permit writer to document all verbal discussions with the public and/or permittee and to keep copies of all letters

- Completed Permit Application
- Baseline Monitoring (if applicable)
- Draft Permit and Fact Sheet
- Correspondence relating to permit development
- Monitoring Waivers, Alternative Limits
- Public Hearing Records



Industrial User Permitting Guidance Manual

833-R-12-001A

September 2012

CHAPTER 11. DOCUMENTATION OF PERMIT DECISIONS 11.1 PERMIT FACT SHEET



United States Environmental Protection Agency
Office of Water



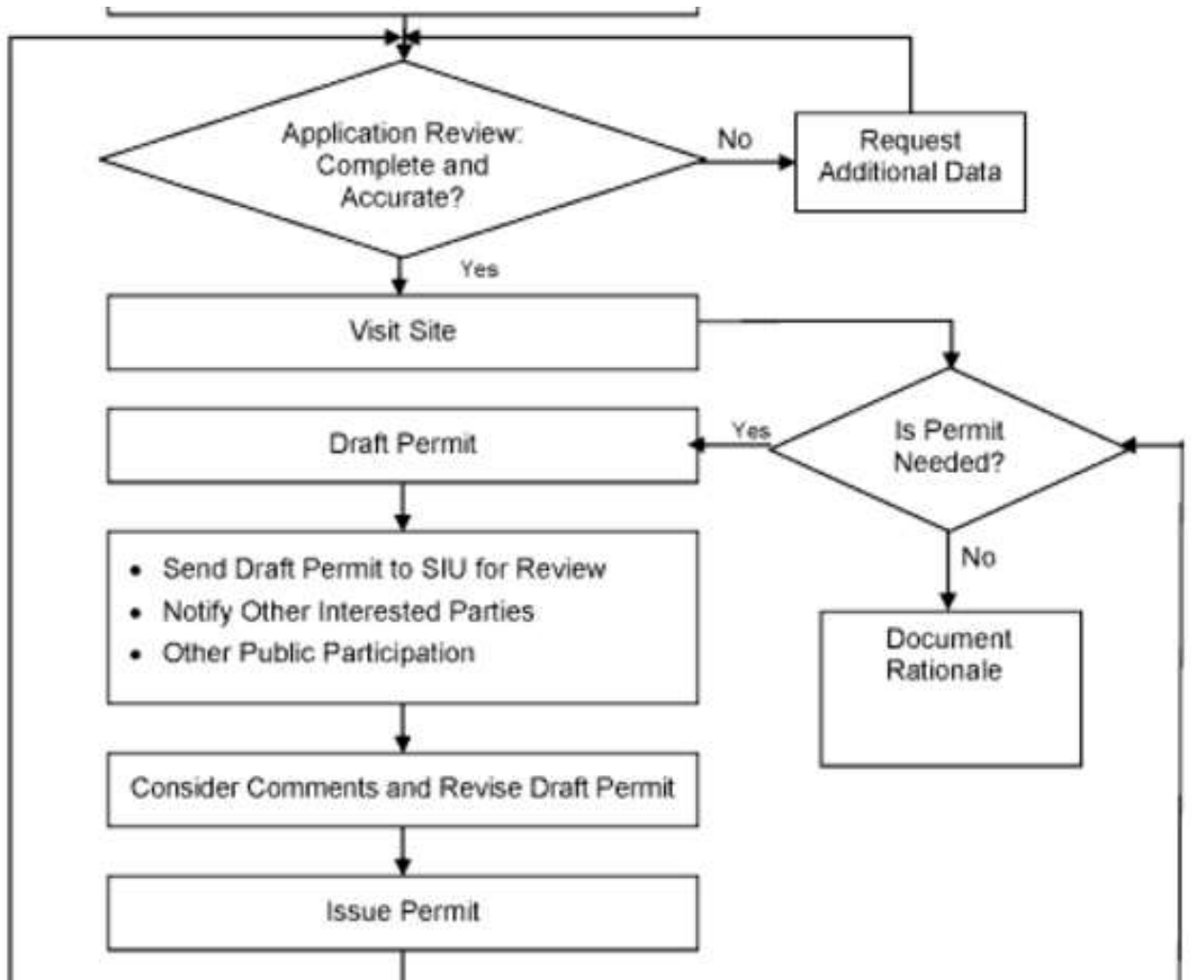
Industrial User Permitting Guidance Manual

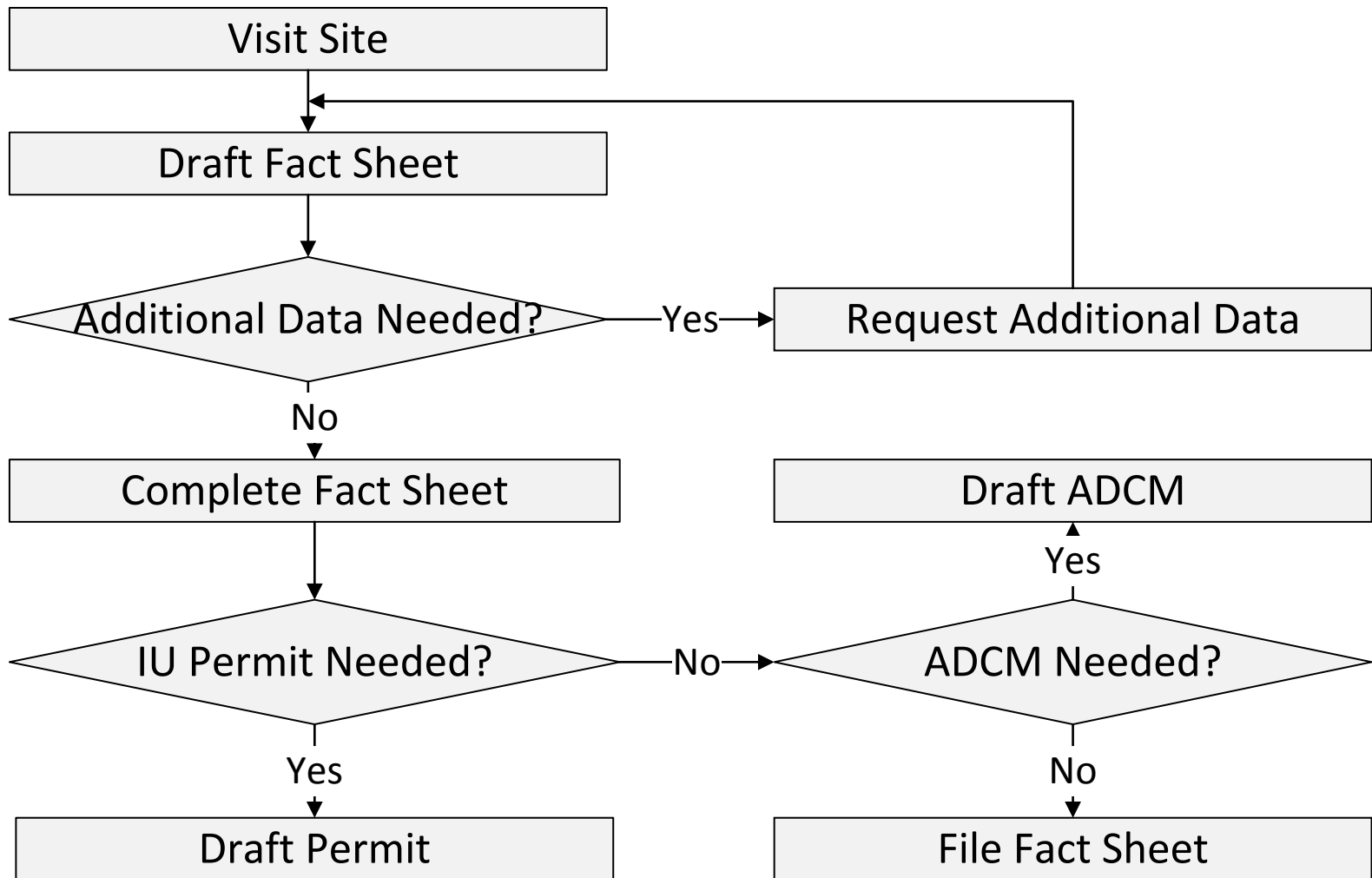
“Although such documentation might seem an unnecessary and a time-consuming task, it will inevitably play a critical role in any permit challenge, and in the long run, it can save the permit writer a great deal of time and effort.”



United States Environmental Protection Agency
Office of Water







What Doesn't Belong in a Fact Sheet

- Alternative Facts
- Opinions
- Confidential Information
- Competitive Information
- Reflections on the Past
- Predictions of the Future



Sources of Fact Sheet Information

- Previous Permit
- Permit Application
- Environmental Survey
- Compliance History
- Monitoring Data
- Site Inspections
- MSDS Information
- Fire Marshall Reports
- Storm Water NPDES Permits
- Internet Search
- State Environmental Databases
- Corporate Reports
- Similar Operations
- Sewer and Drainage Maps



General IU Facility Data

- Site Address
- Mailing Address
- Contact Information
- Business Start Date
- Cat. Process Start Date
- Cat. Promulgation Date
- Point of Compliance
- SIC/NAICS Code
- Operating Schedule
- # of Employees
- RCO, Signatory
- Water Sources and Usage
- Average Discharge Volume
- Submeters
- Other Env. Permits
- Receiving Pump Station
- Total Area & Area to Storm
- Safety Considerations



Contents of a City of Portland Fact Sheet

- IU information (contacts, etc.)
- IU business description
- Site history
- Why is the IU permitted
- Processes generating wastewater
- Untreated wastewater description
- Pretreatment description
- Process and pretreatment diagrams
- Compliance history
- Analysis of discharge data



Contents of a City of Portland Fact Sheet (cont.)

- Explanation of the pollutants of concern
- Applicable limits
- Explanation of limits calculations
- Explanation of monitoring frequencies
- Explanation of inspection frequencies
- Special permit conditions
- Monitoring location and sampling method justification
- ASPP, TOMP, Slug Control Plan



Contact Information and Resources

- Eric De Berry, (503)-823-5538, City of Portland, Bureau of Environmental Services
eric.deberry@portlandoregon.gov

- EPA Industrial User Permitting Guidance Manual, September 2012

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