

The PWD Industrial Waste Unit (IWU) protects the City's freshwater resources and wastewater treatment plants by enforcing local, state and federal regulations governing wastewater discharges to the City's wastewater and stormwater collection systems

Groundwater Discharge Permit

A groundwater discharge permit must be obtained prior to discharge for any project that will be discharging groundwater or accumulated stormwater from a project site to a City sewer. Projects that often require groundwater discharge permits include, but are not limited to, construction or environmental site remediation projects.

It is illegal to make discharges to City sewer without permission from the Water Department. Discharges without a permit or any other violation of PWD's Wastewater Control Regulations are subject to fines of up to \$25,000 per violation per day. Unpermitted discharges to inlets, manholes or separate storm sewers are prohibited.

Permit Application

Projects needing to discharge accumulated groundwater and stormwater to the City sewers must apply for and be issued a Groundwater Discharge Permit prior to any discharge. The application should be submitted by the person directly responsible for the discharge; for larger projects, the on-site subcontractor may need to apply instead of the general contractor.

Please allow at least two weeks for IWU review of permit applications prior to permit issuance and any project discharge. Missing or insufficient information may cause a delay in permit issuance

Applications must include the following documents:

- Groundwater Discharge Permit Guidance and Application
- Project Summary
- Site Plan
- Permit Fee'scheck for \$1,000 payable to "City of Philadelphia"

It is recommended that the following information also be included with the permit application:

- Analytical Results of Groundwater Sampling (strongly recommended) -- If there is no prior knowledge of potential contaminants, IWU recommends a groundwater sample be taken and analyzed for EPA Priority Pollutants.
- Treatment System Diagram (if treatment will be necessary to meet PWD local limits found in Wastewater Control Regulations Section 501.3(b))
- Phase I and/or Phase II Environmental Site Assessments (if available)

It is important for the applicant to provide as much information as possible about the project site and the expected conditions of the groundwater to be discharged. IWU bases its permit limits, monitoring and sampling requirements on the permit application and will err on the side of caution when drafting a permit to ensure the protection of the City's workers and wastewater treatment plants.

Permit Renewal

When seeking renewal of an existing permit, the permittee must send a letter requesting extension of the permit along with a copy of the existing permit and the permit fee (\$1000) at least 30 days prior to expiration of the existing permit.

Permit Requirements

After a permit application has been reviewed, a permit may be issued outlining the specific conditions under which a discharge to the City sewer is authorized. General permit requirements are as follows:

Discharge Conditions

These conditions limit the location or manner in which a discharge is permitted. Conditions may include, but are not limited to, discharge location and any necessary treatment prior to discharge.

Discharge Limits

This section contains numerical and/or narrative limits on discharge parameters and may include specific pollutant as well as flow limitations. Any limitations stipulated in this section will have specific monitoring and reporting requirements.

Monitoring Requirements

To ensure compliance with permit discharge limits this permit section identifies requirements for monitoring flow as well as any pollutants of concern. Permits typically require sampling at a minimum frequency of once per month.

Reporting Requirements

Permits specify a reporting frequency for each project. Reporting frequencies for groundwater permits are typically quarterly, as determined by IWU. Reports are required to include flow monitoring information, discharge quantities and the results of any required sample analyses as specified by the permit and must be mailed to the Industrial Waste Unit.

It is the permittee's responsibility to report any violation of permit limitations (see Wastewater Control Regulations Section 501.6(h)) to IWU within 24 hours of becoming aware and to submit to the City within five (5) business days, unless otherwise specified, a detailed written report describing the discharge and the measures taken to prevent similar future occurrences. User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the City within thirty (30) days of becoming aware of the violation. There may be a monetary fine assessed for failing to promptly notify IWU of any violation (see "Permit Violations" below).

Permit Closure

Upon completion of the permitted project it is the discharger's responsibility to submit a closure statement. The closure statement must include the following information:

- Name and address of the permitted project
- Name and telephone number of company contact person
- Final date of discharge
- List of discharges that will continue to operate at the same location
- A certification statement signed and dated by an authorized representative of the permittee. (see Wastewater Control Regulations Section 501.6(k))

This Groundwater Permit Closure Form may be, but does not need to be, used for providing this notification to the City.

Permit Violations

Violations of any permit requirements including reporting, sampling and permit limits are subject to monetary fines. Fines range from \$300-\$25,000 per violation per day based upon the severity of the violation. The City's Civil Penalty Assessment Policy can be found in Section 501.16 of the Wastewater Control Regulations. Violations of permit conditions also trigger specific reporting requirements. Please see the "Reporting Requirements" section above for more information.

Billing of Permittees

In addition to the permit fee, the permittee will be billed for the quantity of the groundwater discharged according to the applicable rate in the PWD regulations Section 307.1 Sewer Charges for Groundwater.

Significant Industrial User (SIU) Wastewater Discharge Permit

SIU permits regulate Industrial Users of the City sewer system. These permits specify monitoring and reporting requirements for SIUs to demonstrate compliance with applicable local, state and federal regulations. Industries that plan on using the City sewer for disposal of wastewater from production processes must complete a Baseline Monitoring Report (BMR) and return it to IWU for determination of permit applicability.

Reporting Requirements

Indication of Violation

Pursuant to wastewater discharge permit Part IV, Section (4), permitted Industrial Users must notify the City within twenty-four (24) hours of becoming aware of a sampling violation. Industrial User shall resample and submit results of the resampling within 30 days of becoming aware of the violation. Resampling shall continue until the user returns to compliance. Resampling is an additional sampling requirement and does not meet any other sampling requirements. In addition, Industrial User shall submit to the City an Accidental and Unpermitted Discharge Report as required by Part IV, Section 2(b) of their permit within five (5) working days of the initial violation notification. Please refer to the The Pretreatment Times (July 2011) for sampling suggestions to avoid violation.

Semi-Annual Compliance Reports

Permitted Industrial Users must submit monitoring reports to the Department during the months of January and July, unless required in different months or more frequently by the Department. Minimum Compliance Report requirements can be found in Part IV, Section 1(a) of your wastewater discharge permit. This Semi-Annual Compliance Report Cover may be, but does not need to be, when submitting a Semi-Annual Compliance Report.

Accidental Spill Prevention Plan / Slug Control Plan

Pursuant to wastewater discharge permit Part IV, Section (3), all permitted Industrial Users are required to submit to their permit administrator an Accidental Spill Prevention Plan / Slug Control Plan (ASPP/SCP) to the City within three (3) months of permit issuance. The minimum requirements for a satisfactory ASPP/SCP are enumerated in this section of the permit. Upon receipt, the City will review each ASPP/SCP using its ASPP/SCP Review Checklist to ensure it meets the requirements set for in the permit. IWU will notify the User in writing after a determination has been made.

Duty to Reapply

All Industrial Users with an active wastewater discharge permit are required to apply for a new permit at least one hundred and eighty (180) prior to the expiration of their permit. Users

reapplying must complete the City's Baseline Monitoring Report and return it to the IWU for evaluation.

Certification Requirement

As required by the Philadelphia Water Department Regulations, Section 501.6(k), any report submitted to the City by a permitted Industrial User must include 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."

Signatory Requirement

All Industrial User reports submitted to the City must be signed by an Authorized Representative of the Industrial User. The definition of an Authorized Representative can be found in Part VI, Section 4 of your wastewater discharge permit. Please ensure that the report signatory meets these requirements. If an Industrial User would like to designate a signatory meeting the requirements under Part VI, Section 4(c), the Industrial User must notify the City in writing of this designation. The following form may be, but does not need to be, used for this designation: Signatory Designation Form. Pursuant to wastewater discharge permit Part VI, Section 4(d), should the submitted signatory designation become inaccurate, the User is required to submit a new designation form prior to the submission of any signed reports.

Limitation of Permit Transfer

Pursuant to wastewater discharge permit Part VI, Section (6), permits are neither assignable nor transferable without prior written approval from the City. This condition applies to both facility ownership and name changes. In the event that a permitted facility will be bought by another entity, or wishes to change the name under which the facility is permitted, the User is required to notify the City of this at least 30 days in advance. The 30 day advance notice will allow the City appropriate time to enact any required permit amendments due to the proposed change. The following form may be, but does not need to be, used for providing the City with written notification of a facility name or ownership change: Name or Ownership Change Notification Form

Closure Statements

Industrial Users requesting modification or termination of their wastewater discharge permit due to ceasing all or part of their processes regulated by the permit must submit a Closure Statement at least thirty (30) days prior to closing. Minimum Closure Statement requirements

can be found in Part IV, Section (5) of your wastewater discharge permit. This Permit Closure Form may be, but does not need to be, used for providing this notification to the City.

Notification of Change in Discharge

Pursuant to wastewater discharge permit Part IV, Section 1(c), permitted Industrial Users must notify the City of any changes in production which exceed twenty percent (20%) of the production units. Changes must be reported in the event of a 20% production increase or decrease relative to the production levels reported in the users permit application. Pursuant to wastewater discharge permit Part IV, Section 1(d), permitted Industrial Users must notify the City of any changes in production that could result in changes the facility's wastewater discharge and/or affect the potential for a slug discharge

For Questions, please contact us:

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