

# **The Pretreatment Times**



#### **MISSION STATEMENT**

The mission of the Industrial Waste Unit (IWU) is to protect 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.

#### What's Inside?

- The Compliance Assistance section offers strategies for avoiding Significant Non-Compliance (SNC) from pH violations.
- Information about the upcoming Pretreatment Conference hosted by the Eastern Pennsylvania Water Pollution Control Operators Association (EPWPCOA).
- This issue concludes with a challenging Pretreatment Crossword Puzzle for your enjoyment.

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Inside This Issue:

| Compliance                 | 2 |
|----------------------------|---|
| Pretreatment<br>Conference | 2 |
| Pretreatment<br>Puzzle     | 3 |
| IWU Contact<br>Information | 3 |

## **REMINDER**



## Semi-Annual Compliance Reports are Due NO LATER THAN <u>January 31, 2018</u>.

Submitting your Semi-Annual Compliance Report more than 30-days late is considered Significant Non-Compliance.

Failure to submit your Semi-Annual Compliance Report will result in Significant-Non Compliance!

Volume 17 Page 2

## Compliance Assistance Strategies for Avoiding SNC from pH Violations

The Philadelphia Water Department's local limit on pH is:

### 5.5 < pH < 12.0

pH samples shall be no less than 5.5 and no greater than 12.0. Samples that are out of compliance have the capability to interfere with wastewater treatment plant operations and City sewer systems. If you find your samples out of compliance, resample until compliance is achieved!

#### **♦** Read Lab Reports Promptly

Check with your laboratory and ask them to report pH monitoring results to you immediately. In the case of pH monitoring, your laboratory should be determining the pH of your facility's effluent at the time they are collecting samples. Don't forget that if your pH sample is not in compliance with your permit limits you must:

#### ♦ Resample When Out of **Compliance**

Your permit requires you to resample when any parameter is out of compliance and show a return to compliance. For pH, this resample can happen as soon as 15 minutes after the previous sample. Once a pH sample has shown a return to compliance, you have met this requirement, but you may still be in SNC based on your percentage of noncompliant samples. If you find that you still have more than 33% of your samples out of compliance:

#### **♦ Take More Samples**

Bring the percentage of noncompliant samples down by increasing the number of compliant samples analyzed. The definition of SNC is the same for Your permit requirements specify a minimum frequency at which you must sample for the purpose of compliance. It may be in your best interest to sample more frequently than the permit requires. Remember, you can sample for pH as often as every 15 minutes. As an alternative to taking grab samples to determine effluent pH you may want to:



#### **♦** Consider Continuous Monitoring

Continuous monitoring can greatly reduce the likelihood of SNC for pH. grab sample and continuous pH monitoring; however, with continuous monitoring, your percentage of samples out of compliance is determined by dividing the amount of time out of compliance by the total time pH was monitored (i.e. – for a user monitoring continuously over the first 6 months of a year, SNC is only reached if pH is out of compliance for 1444 hours!) Remember, you are always required to meet the minimum monitoring frequency requirements in your permit. To be sure that you are prepared in the event that a continuous pH monitor fails, you should have a contingency plan in place for the collection of grab samples.



## 28th ANNUAL INDUSTRIAL **PRETREATMENT** CONFERENCE

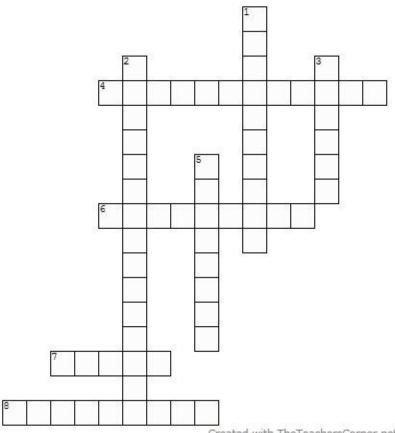
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http://www.epwpcoa.org



Volume 17 Page 3

## **PWD Pretreatment Crossword Puzzle**



#### Across

- 4. To treat in advance or as part of a preliminary treatment
- A substance that pollutes something, especially water or the atmosphere.
- Containing or being poisonous material especially when capable of causing death or serious debilitation
- Silver-gray transitional metal, lighter than steel and hardness similar to copper with a atomic number 40

#### Created with TheTeachersCorner.net Crossword Puzzle Generator

#### Down

- A plumbing device designed to intercept large amounts of oil from food preparations in restaurants that can block drain pipes
- Improper and illegal plumbing arrangement between a potable and non-potable water supply
- An official document giving someone authorization to do something
- Silvery-white, soft, nonmagnetic, ductile metal in the boron group

Answers to this Pretreatment Crossword Puzzle can be provided upon request!

### **Industrial Waste Unit Contact Information**

Questions, comments and suggestions for future topics are always welcome and suggested.

For comments on draft permits contact us at:

Industrial Waste Unit 1101 Market Street, 6th Floor Philadelphia, PA 19107

Phone 215-685-6236 Fax 215-685-6232



For questions about your permit:

Baxter Water Treatment Plant 9001 State Road

Philadelphia, PA 19136

 Kim Veres
 215-685-8096

 Lonnie Goldiner
 215-685-8034

 Walter Milton
 215-685-8095

 Fax
 215-685-8000

Visit the Industrial Waste Unit Online at: www.phila.gov/water/IWU.html