

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.

Volume 4

July 2011

PHILADELPHIA WATER DEPARTMENT SAMPLING MACHINE RESTRICTIONS

Sampling Machines are the property of the City of Philadelphia. They should never be tampered with in any way. Some forms of tampering include:

- ◆ Moving the Sampling Machine
- ◆ Moving or disconnecting the sampling hose

If there is a problem with the sampling machine, contact your Permit Administrator and Sample Technician to get approval before you move it. Any facility found to have tampered with the sampling machine will be subject to penalties including fines up to \$25,000 per incident and/or permit termination.

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Pretreatment Compliance Awards



2011 is the first year IWU will issue Compliance Awards. Since this is the first year of the program, all recipients will receive a Bronze Award. Awards are given based on the number of years the Industrial User is in compliance.

Compliance Award Types

- ◆ Bronze (1-2 years)
- ◆ Silver (3-4 years)
- ◆ Gold (5-9 years)
- ◆ Platinum (10+ years)

REMINDERS:



Semi-Annual Compliance Reports are Due:
NO LATER THAN July 31, 2011

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

If your report has not been received you will find yourself in Significant Non-Compliance!!

Compliance Assistance

Sampling Suggestions for the City's New Significant Non-Compliance Definition



On January 1, 2011 the City of Philadelphia began enforcing amended Philadelphia Water Department Regulations. A letter documenting the regulatory changes was sent to all Industrial Users on October 22, 2010. Many clarifying and organizational changes were made to these regulations, however, one change in particular might have an immediate impact on your facility's compliance status. As part of the regulatory amendments, *the City changed its definition of Significant Non-Compliance (SNC)* According to the new regulations "monitoring for any parameter less than 100% of the total sampling events required by the Permit" will constitute Significant Non-Compliance. This means, that if your facility fails to sample for any regulated pollutant *only once* during a

six month time period, that will constitute SNC, your facility will be publicly noticed and will be subject to a mandatory fine assessed by the City. In order to help your facility avoid SNC for failure to monitor we are offering a number of suggestions that should help you to stay on top of common issues leading to SNC.

1. Use a Calendar – We strongly suggest setting up a sampling calendar and scheduling all sampling events in advance. By scheduling samples at regular intervals, you will create a habit of sampling that will help ensure that you are taking your samples. Remember, a calendar is only useful if you regularly check it! Make a habit of regularly looking at your sampling calendar so that you will not find that you have missed a scheduled sampling event after it is too late.



2. Sample Early – Scheduling sampling events early in your sampling cycle may be an effective strategy for your facility, leaving time to catch any errors or missed sample events and to correct these mistakes. If you schedule your sampling events late in the cycle you may not have time to make up a missed sample before the cycle ends. Regularly sampling early in the cycle you can also help protect your facility from monthly average limit violations. Should your first samples violate the monthly average limit, an early sampling schedule may leave you time to take additional samples that may lower your average and bring you into compliance with the average limit.



3. Read Lab Reports Promptly – You don't want to be in SNC because the laboratory failed to analyze for a regulated pollutant and you did not notice until it was too late. Read your laboratory reports immediately upon receipt! You should always be in the habit of reading your reports to identify any violations (and if present, promptly notify IWU). When you are reviewing these reports, also check to make sure the laboratory did the necessary analyses for all of your regulated pollutants and detection limits. If the laboratory failed to test your sample for all regulated pollutants or detected any pollutants at concentrations above the limits in your Permit, you may still have time to resample or get your sample reanalyzed if you remembered to *schedule your sampling event early in the sampling period.*

Pretreatment Awards 100% Compliance

This issue brings the first annual awarding of the Industrial Waste Unit's Pretreatment Certificates for 100% Compliance. These certificates will be awarded annually to permittees who have had no violations of their wastewater discharge permit in the previous year. The certificates also recognize consecutive years of compliance through the award of silver (3-4 years), gold (5-9 years) and platinum (10+ years) certificates. As IWU began this program in 2010, this year's awardees all are receiving bronze certificates. Out of the 140 permitted industries, 85 received this certificate. Below is the list of some of industries.¹

2011 Bronze Award Recipients

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| 1. Advance Technologies | 25. Lannett Company, Inc. |
| 2. AECO, Inc. | 26. Lannett Company, Inc. |
| 3. Ashland Chemical Company | 27. LSG Sky Chefs |
| 4. Bethayres Reclamation Corporation | 28. Martin/F. Weber |
| 5. BlackGold Biofuels | 29. Max Levy Autograph, Inc. |
| 6. Caledonian Dye Works, Inc. | 30. Medical Products Laboratories |
| 7. Catalent Pharma Solutions Inc. | 31. Michel's Bakery, Inc. |
| 8. Clean Rental Services, Inc. | 32. Mutual Pharmaceutical Company |
| 9. Columbia Silk Dyeing Company, Inc. | 33. Naval Foundry & Propeller Center |
| 10. CSX Transportation, Inc. | 34. Neatsfoot Oil Corporation |
| 11. Curtiss Laboratories | 35. NEL Metal Restoration |
| 12. Department of the Treasury, United States Mint | 36. PaperWorks Industries, Inc. |
| 13. DGM Custom Polishing & Finishing Corporation | 37. Penn Fishing Tackle Manufacturing Co. |
| 14. Domestic Uniform Rental | 38. Pepsi Beverages Company |
| 15. G.J. Littlewood & Son, Inc. | 39. Polysat, Inc. |
| 16. GE Betz, Inc. | 40. Premier Medical (MFG) |
| 17. GE International, Inc. | 41. Regal International Leathers, Ltd. |
| 18. Hillock Anodizing, Inc. | 42. Richards-Apex, Inc. |
| 19. Hillock Anodizing, Inc. | 43. Servisair, LLC |
| 20. HP Hood, LLC | 44. Simons Brothers |
| 21. Inolex Chemical Company | 45. Sweet Ovations, LLC |
| 22. J.P. Cerini Technologies, Inc. | 46. Thermacore, Inc. |
| 23. Kohler Freda, LLC | 47. Trio Silversmiths |
| 24. Kraft Foods Nabisco Bakery | 48. United Parcel Service, Inc. |
| | 49. Vibroplating, Inc. |
| | 50. Wayne Mills Company, Inc. |

¹If your Company's Name does not appear in the list above, it is because confirmation was not received for the publication. To be included in the next publication, contact IWU at 215-685-6085.

WATER DEPARTMENT NEWS

Iodine-131 Found in Philadelphia’s Drinking Water Q&A

What is Iodine-131?

Iodine-131 is a radioactive form of iodine. When certain atoms disintegrate, they release a type of energy called ionizing radiation. This energy can travel as either electromagnetic waves (i.e., gamma or X-rays) or as particles (i.e., alpha, beta or neutrons). The atoms that emit radiation are called radionuclides; e.g., radioactive iodine, cesium, and plutonium.

Where does Iodine-131 come from?

Iodine-131 is a byproduct of nuclear energy production. It is also used in medicine to diagnose and treat disorders of the thyroid gland.

What actions has the Philadelphia Water Department (PWD) taken based on the EPA test results?

Philadelphia’s drinking water is safe to drink. An infant would have to drink almost 600 liters of water at 2.2 pCi/L to receive a radiation dose equivalent to a day’s worth of the natural background radiation exposure that we experience continuously from natural sources of radioactivity in our environment. However, this does not mean that PWD is not concerned about these levels. In response to these results, PWD is working with the EPA and DEP and taking the following actions:

- Developing a Joint PADEP, EPA, PWD Action Plan for all Radionuclides
- Initiating a focused sampling program for Iodine
- Developing an aggressive track down program with EPA and DEP to identify the potential sources of Iodine-131 in our source waters
- Using enhanced treatment and activated carbon at our Queen Lane Water Treatment Plant to minimize Iodine-131 concentrations as a precautionary measure. Carbon works to absorb contaminants in drinking water and is removed during the filtration process.

How often is the water monitored? At what locations?

PWD monitors its drinking water every day at its three water treatments plants and at points throughout its 3,000 mile delivery system. Our water consistently does better than Safe Drinking Water Act (SDWA) standards and has always met all health standards. However, SDWA compliance sampling does not include Iodine-131. PWD works with the EPA on a voluntary basis to ensure that this sampling is conducted by them.

How do the levels of Iodine-131 found most recently compare to past measurements?

EPA has detected low levels of Iodine-131 in a number of drinking water samples since the Japanese nuclear incident, but because of the levels of Iodine-131 historically seen in Philadelphia’s drinking water, it is unclear whether the April 4 results are related to radiation from Japan or other sources in the Philadelphia area.

Are there standards for drinking water safety?

The federal drinking water standard for Iodine-131 is three pCi/L and is based on a long term average, not a single day sample. These samples are taken on a quarterly basis.

How long does it stay in the environment?

Iodine-131 is a short-lived radioactive element, with a half-life of 8 days, meaning every 8 days it loses half of its radioactivity. It is not one of the radioactive chemicals that persist for a long time.

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, 3rd 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

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 Bob Gonsiewski 215-685-8093
 Evan Schofield 215-685-8068
 Fax 215-685-8008