

# The Pretreatment Times



## Mission Statement

*The 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.*

## What's Inside?

- ◆ Compliance Assistance—Learn about updated oil & grease monitoring requirement and where you can locate analytical requirements for all regulated wastewater pollutants.
- ◆ PWD News—A report on PWD Commissioner Howard Neukrug, who recently received the Water Environment Federation's Public Officials Award.
- ◆ Tips for Preparing for Your Next Annual Inspection

Volume 9

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## REMINDER

Semi-Annual Compliance Reports are Due:  
NO LATER THAN  
January 31, 2014

Failure to submit your report in a timely manner may subject your facility to monetary fines.

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



## SMIP GRANTS

PWD and the Philadelphia Industrial Development Corporation (PIDC) are providing funding to stimulate investment in improved stormwater management practices through the issuance of Stormwater Management Incentives Program (SMIP) grants. Grants up to \$100,000 per impervious acre managed are available to commercial and industrial customers, and completed projects may qualify for stormwater credits. The current round of applications are due by January 31, 2014, but more grants will be issued in the future. Head to:

[www.phillywatersheds.org](http://www.phillywatersheds.org)  
Search "SMIP" for more information.



# Compliance Assistance

## Updated Oil & Grease Monitoring Requirements

During October 2013, the Industrial Waste Unit sent written notification of updated oil & grease (HEM and/or SGT-HEM) monitoring requirements to all permittees subject to those permit limitations. Effective immediately, those permittees may use analytical methods approved in 40 CFR Part 136. Future analyses no longer specifically require the use of EPA Method 1664A. The following methods are currently approved by the EPA:

<b>METHODS APPROVED UNDER 40 CFR PART 136.13</b>		
Parameter	EPA Method	Standard Methods
Hexane Extractable Material (HEM)	1664 Rev. A 1664 Rev. B	5520 B-2001*
Silica Gel Treated HEM (SGT-HEM)	1664 Rev. A 1664 Rev. B	5520 B-2001* 5520 F-2001*

\* - Only use n-hexane (n-Hexane—85% minimum purity, 99.0% min. saturated C6 isomers, residue less than 1 mg/L) extraction solvent when determining Oil and Grease parameters—Hexane Extractable Material (HEM), or Silica Gel Treated HEM (analogous to EPA Methods 1664 Rev. A and 1664 Rev. B). Use of other extraction solvents is prohibited.

During February 2010, the EPA announced the requirements for HEM and SGT-HEM analysis using Method 1664B. This method revision was established to improve method performance and clearly define acceptable method modifications. At this time, methods 1664A and 1664B are approved EPA methods for analyzing both HEM and SGT-HEM concentrations in wastewater. The EPA strongly encourages use of Method 1664B and has stated that it will likely withdraw approval for Method 1664A; however, there is currently no timetable for this action.



Please be aware that 40 CFR Part 136 also approves the use of SM 5520B for HEM and SGT-HEM analysis, and SM 5520F for SGT-HEM analysis, but specifically requires the use of n-hexane as the extraction solvent. If these methods are used for this analysis the laboratory must identify the extraction solvent. Failure to identify the extraction solvent or use of other extraction solvents will be considered a violation and may subject your facility to monetary fines.

If you have any questions regarding these requirements, please contact your permit administrator

*For a list of the approved analytical methods for all regulated wastewater pollutants, please go to: [www.ecfr.gov](http://www.ecfr.gov). Specific analytical method approvals can be found under Title 40 (Protection of the Environment), Part 136.3*

## Water Department News

# Commissioner Receives Public Officials Award



Philadelphia Water Department Commissioner Howard Neukrug was awarded the prestigious Public Officials Award by the Water Environment Federation (WEF), an international, not-for-profit technical and education water quality organization, at the organizations 86th Annual Technical Exhibition and Conference held October 5-9 in Chicago, Illinois.

The WEF Public Officials Award is presented to elected or appointed public officials that have made significant contributions to clean water legislation, public policy, government service or another area of public prominence that resulted in improvements to the water environment.

"It is an honor to be selected for this prestigious award from an organization that is committed to ensuring that safe, clean water is available worldwide," remarked Water Commissioner Neukrug. "I have been fortunate to work with and have the support of the many talented employees at the Philadelphia

Water Department and consider it a privilege to have dedicated my career to civil service and be recognized for it."

Howard started with the City of Philadelphia as a Treatment Research Engineer and then became the Director of Planning and Technical Services for the Water Department. Soon after, he founded the City's first Office of Watersheds. As the head of this office, he has led many innovative and award-winning programs, including establishing a comprehensive watershed monitoring network. After leading the development of the City's Green City, Clean Waters Program, he was appointed Water Commissioner in February 2011.



## 2014 Industrial Pretreatment Conference

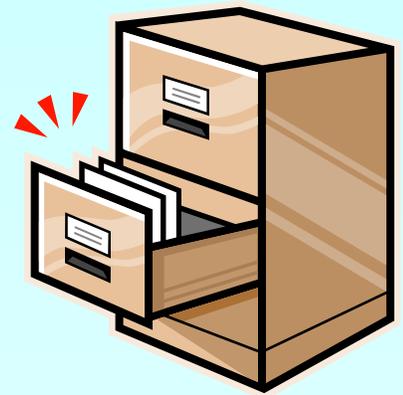
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For more information visit: <http://www.epwpcoa.org>

# Preparing for Your Next Annual Inspection

Federal pretreatment regulations require IWU to conduct inspections of each permitted industrial facility at least once during each calendar year. Annual inspection includes a physical inspection of the permitted facility, including all production, storage and wastewater treatment areas, as well as an interview portion during which IWU will verify permittee information and review a number of files that permittees are required to keep.

To increase the efficiency of these inspections, permittees can assemble some required information prior to IWU's arrival. The following documents will need to be reviewed by your inspector to ensure a complete annual inspection:



- ◆ **Chain of Custody Forms**—All samples collected for compliance purposes and analyzed by a third party must be accompanied by a chain of custody documenting the samples collected, collection method, analysis requested and all handlers of that sample from collection to analysis. IWU will review chain of custodies showing samples collected for all regulated parameters to ensure that your facility is meeting this sampling and record keeping requirement.
- ◆ **Log Books for In-house Sample Analysis**—Log books maintained for documenting any analysis conducted in-house will need to be reviewed.
- ◆ **Water Account Information**—To verify water usage, and account numbers, IWU requests the review of at least the most recent bill for all water/sewer, fire service, and surcharge accounts for the facility.
- ◆ **Chemical Inventory**—A full accounting for all chemicals stored on-site is required, and in many cases, this list can be quite long and detailed. IWU will verify the current list of chemicals stored on site and the maximum quantity your facility would store at any given time.
- ◆ **Waste Disposal Manifests**—If your facility uses a waste disposal company to remove any hazardous, non-hazardous, universal, or grease trap wastes, you are required to maintain those files as proof of disposal. At your annual inspection, IWU will review manifested waste disposal since the last annual inspection.

## Industrial Waste Unit Contact Information

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

For comments on draft permits:

Industrial Waste Unit  
1101 Market Street, 3rd Floor  
Philadelphia, PA 19107

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



For questions about permit compliance:

Baxter Water Treatment Plant  
9001 State Road  
Philadelphia, PA 19136

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**Visit the Industrial Waste Unit Online at: [www.phila.gov/water/IWU](http://www.phila.gov/water/IWU)**