



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Clean Water Management

Permit Obligation Training

PA DEP

Presenters

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PA DEP Southeast Regional Office

▶ Legal Basis of Your Permit

Federal Law – Clean Water Act
Regulations

State Law – Clean Streams Law
Regulations



▶ The Clean Stream Law

➤ PROHIBITION OF DISCHARGE OF POLLUTANTS

- No person or municipality may discharge or permit to be discharged pollutants
- Section 1 defines Pollution very broadly:
 - a liquid, solid or gas that alters the physical, chemical, or biological properties or a change in temperature, taste, color or odor

.....into the Waters of the Commonwealth.

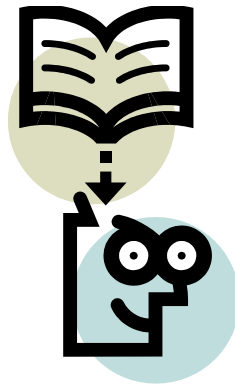
"Waters of the Commonwealth" any and all rivers, streams, creeks, rivulets, impoundments, ditches, water courses, storm sewers, lakes, dammed water, ponds, springs and all other bodies or channels of conveyance of surface and underground water.

- Except as provided by the Act (Your Permit)

▶ The NPDES Permit

Layout, Requirements, and Special Conditions

READ YOUR PERMIT!!!



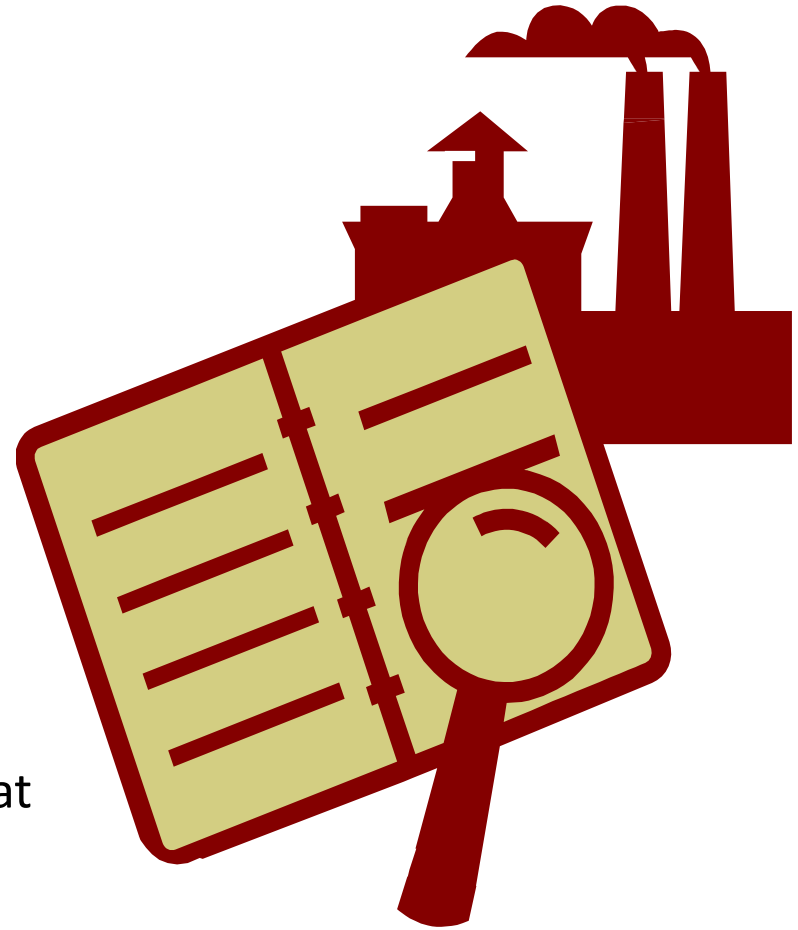
▶ Permit Layout

➤ Your permit is divided into 5 parts:

- Front page
- Effluent limits, monitoring, reporting, recordkeeping (Part A)
- Standard conditions (Part B)
- Special conditions (Part C)
- Attachments - DMR and Supplemental Forms

Front Page

- What the authorization is for
- Who the authorization is to
- Issuance and Effective dates
- Expiration date
- Requirement to submit a timely renewal application
 - Renewal application must be submitted at least 180 days (6 months) prior to the expiration date



Part A I- Effluent Limitation

- Description of outfall location
- Discharge parameters (pollutants of concern)
- Allowable loads and concentrations
- Minimum monitoring and reporting requirements

▶ Part A I

- Additional requirements
 - Narrative limits
 - What the permittee may not discharge
 - Foam, sheen, scum, deposits, etc...
- Minimum of 85% removal for BOD₅ or CBOD₅ and TSS on a monthly average for STPs
- During all bypass events the permittee shall monitor the discharge(s) for the effluent parameters in Part A using the sample types required in Part A. Composite sampling must commence within one hour of the start of the bypass. The results shall be reported in accordance with the permit.
- Footnotes
- Supplemental Information
 - Specifies the hydraulic and organic design capacity, and flow used to determine your limits

Part A II – Definitions

➤ Very important and often skipped

- Defines many key terms found in the permit

Example: Composite and Grab Samples

- *Composite Sample*... a combination of individual samples of at least 100 ml obtained at spaced intervals. It must be flow-proportional- either the volume of each individual sample is proportional to discharge flow rates, or the sampling interval is proportional to the flow rates over the time period.

- ❖ Must be adjusted for periods of high flows!

- *Grab Sample*... an individual sample of at least 100 ml collected at a randomly selected time over a period not to exceed 15 minutes.

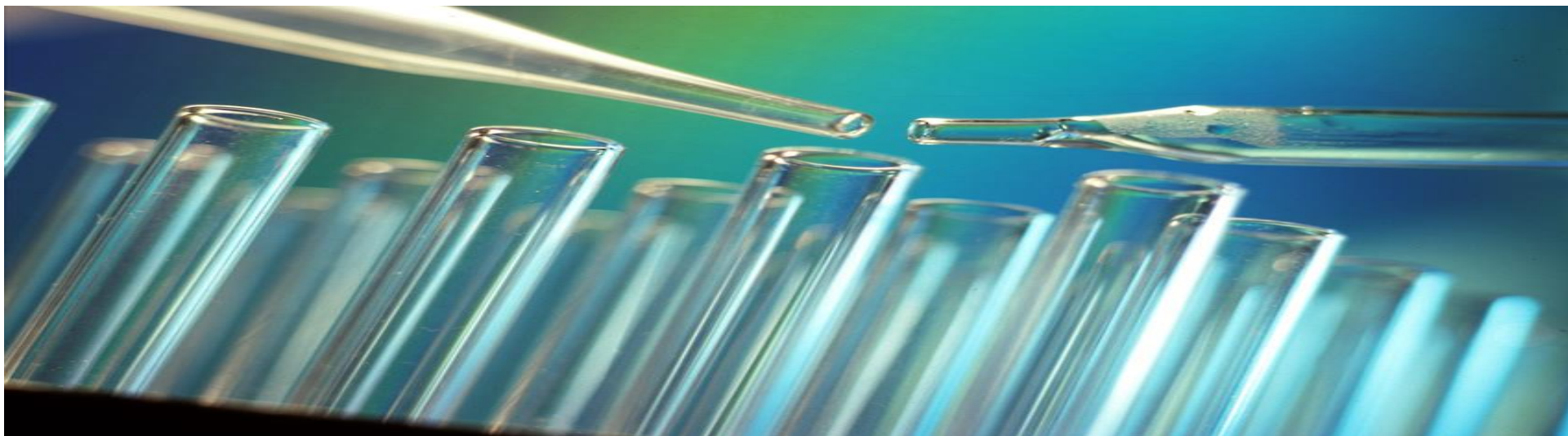
➤ Representative sampling

- Samples and measurements shall be representative of the monitored activity
- This includes sampling during periods of adverse weather, changes in treatment plant performance and changes in treatment plant loading
- Samples must be collected where the effluent is well mixed, near the center of the pipe and at the approximate mid-depth point, where the turbulence is at a maximum and the settlement of solids is minimized.



► Part A III

- All samples collected at the compliance monitoring point(s) in accordance with your permit must be analyzed and reported on the DMR, even if these exceed the number required by the permit.



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Part A III

➤ Records retention

- All logs, calibration records, sample results, etc. must be retained by the permittee for a minimum of 3 years. Sludge records for 5 years.

➤ Test procedures, QA/QC

- All samples used to determine compliance with your permit must be analyzed by a lab accredited under Act 90, utilizing test procedures approved under 40 C.F.R. Part 136, unless otherwise specified in your permit.

➤ Reporting to DEP- DMRs received by the 28th of the following month

➤ Signatory



Part A

➤ Recording of Results

For each measurement or sample taken record the following information:

- The exact place, date, and time of sampling or measurements.
- The person who performed the sampling or measurements.
- The date the analyses were performed.
- The person who performed the analyses.
- The analytical techniques or methods used; and the detection level.
- The results of such analyses.

➤ Reporting of Monitoring Results

Effectively monitor the operation and efficiency of all treatment and control facilities, and the quantity and quality of the discharge.

Part A III

➤ Planned Changes to Physical Facilities

Notify DEP within 30 days of planned physical alterations or additions to the facility. A permit may be required for the planned changes when:

- The alteration or addition meets one of the criteria for determining new source in 40 CFR §122.29(b)
- Significantly increases the quantity of pollutants discharged, which are not subject to effluent limitations in the permit
- Results in a significant change in the facility's sludge use or disposal practices
- May result in noncompliance with permit requirements
- The facility is proposing an expansion or modifications to its treatment processes

► Part A III

► Planned Changes to Waste Stream

Notify DEP within 45 days prior to any changes in the volume or pollutant concentration of its influent waste stream as a result of indirect discharges or hauled-in wastes.

- Notice shall be provided on the “Planned Changes to Waste Stream” Supplemental Report
- Provide information on the quality and quantity of waste introduced and any anticipated impact of the change on the effluent to be discharged
- The Supplemental Report shall be sent via Certified Mail or other means to confirm DEP’s receipt of the notification
- DEP will determine if a permit amendment is required

► Part A III

► Introduction of New Pollutants

Notify DEP within 45 days prior to the introduction of new pollutants. The permittee may not authorize the introduction of new pollutants until written approval is received from DEP.

New pollutants are defined as parameters that meet one or more of the following criteria:

- Were not detected in the facilities' influent waste stream, or were otherwise not analyzed in the influent and reported to DEP prior to permit issuance
- Have not been previously approved to be included in the facilities' influent waste stream by DEP
- Are previously unapproved pollutants introduced into the facility from an indirect discharger

► Part A III

➤ Increased Loading of Approved Pollutants

The permittee shall provide notification of an increased influent loading (lbs/day) of pollutants that have already been approved when:

- They exceed 10% of the maximum loading reported in the permit application.
- They may cause interference or pass through
- They may result in an exceedance of effluent limitations in Part A of your permit
- They may result in a hydraulic or organic overload condition
- They may cause exceedances of water quality standards in the receiving stream

▶ Part A III

➤ New Information on Existing Discharges

The permittee shall provide notice of and the anticipated impacts to the treatment plants discharge when it discovers new information, not previously reported, on the quality and quantity of the effluent introduced by an industrial user or an indirect discharger.

▶ Part A III

➤ Reporting Requirements for Hauled-In Wastes

- Residual Waste-

The permittee shall document the receipt of all hauled-in residual wastes (including but not limited to waste from oil and gas wells, food processing, and landfill leachate)

- Municipal Waste-

The permittee shall document the receipt of all hauled-in municipal wastes (including but not limited to septage and liquid sewage sludge)

The permittee shall report hauled-in residual and municipal wastes on a monthly basis to DEP on the “Hauled In Residual Wastes” and the “Hauled In Municipal Wastes” Supplemental Report(s) *as attachments to the DMR*

Part A III

➤ Reporting requirements:

Anticipated and unanticipated non-compliance or potential pollution

- It is the responsibility of the person at the time in charge of the substance to immediately notify DEP by Phone. This includes the operators, owners or other responsible persons.

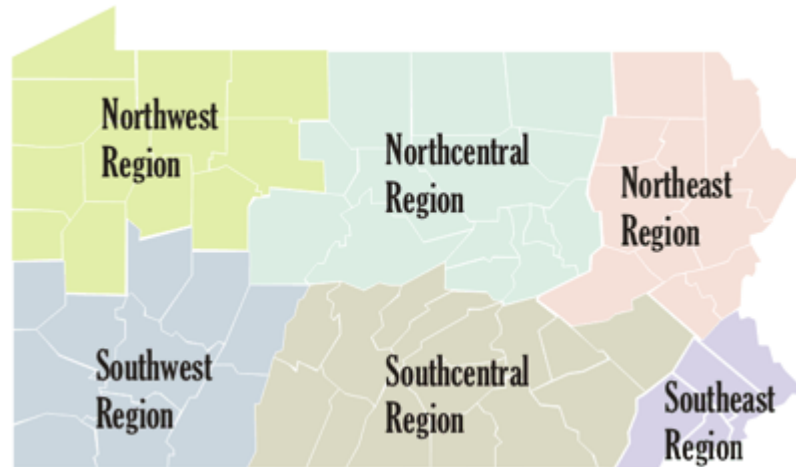
During work hours, call the DEP Regional office and speak with an Operations Section staff member

After working hours, call the Regional office emergency number

- Notify Downstream Users
- Immediately Take Steps to Remove Residuals within 15-day



DEP Regional Office Contact Information



Northwest Regional Office

230 Chestnut Street
Meadville, PA 16335
Office Hours 8 a.m. - 4 p.m.
Phone: 814-332-6945 (Office hours)
1-800-373-3398 (after hours)

Northcentral Regional Office

208 West Third St.
Suite 101
Williamsport, PA 17701
Office Hours 8 a.m. - 4 p.m.
Phone: 570 327-3636 (24 hours/day)

Northeast Regional Office

2 Public Square
Wilkes-Barre, PA 18701-1915
Office Hours: 8 a.m. to 4 p.m.
Phone: 570-826-2511 (24 hours/day)

Southeast Regional Office

2 E. Main Street
Norristown, PA 19401
Office Hours 8 a.m. - 4 p.m.
Phone: 484 250-5900 (24 hours/day)

Southcentral Regional Office

909 Elmerton Ave.
Harrisburg, PA 17110
Office Hours: 8 a.m. to 4 p.m.
717.705.4700 (Office hours)
1.800.333.1904 (after hours)

Southwest Regional Office

400 Waterfront Drive
Pittsburgh, PA 15222
Office Hours: 8 a.m. to 4:30 p.m.
412-442-4000 (24 hours/day)

► Sanitary Sewer Overflows (SSO)

► Wet Weather / Dry Weather

- SSOs are not authorized under your permit. The operator shall immediately report any SSO to DEP in accordance with 91.33.
- Phone Notification and Written SSO Reports

During working hours, call the DEP Regional office and speak with an Operations Section staff member

After working hours, call the DEP Regional office emergency number

Other agencies and entities may also need to be notified

Submission of written report within 5 days

► Part A III

► Reporting requirements con't:

- Written Report –
 - A written submission shall be provided within 5 days of the time the permittee becomes aware of any noncompliance.
- The report must describe:
 - The cause of noncompliance
 - The exact dates and times
 - If noncompliance has not been corrected, provide the anticipate time required to achieve compliance
 - The steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance



► Part B I - Management

- Compliance schedules
- Permit modification, termination, reissuance
- Duty to provide information
 - Including obligation on meeting the requirements of Chapter 94 annual reporting
- General Pretreatment Requirements
- Proper Operation and Maintenance
- Duty to mitigate
- Bypassing

➤ Proper Operation & Maintenance

- The permittee shall employ operators certified in compliance with the Water and Wastewater Systems Operators Certification Act.
- The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used to achieve compliance with the terms and conditions of the permit. As detailed in the facilities WQM Permit.
- Proper operation and maintenance includes, but is not limited to:
 - Adequate laboratory controls including appropriate quality assurance procedures
 - Operation of backup or auxiliary facilities or similar systems that are installed

► Part B II - Penalties and Liabilities

► Violations of permit conditions

► Falsifying Information

Any person who does any of the following:

- Falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under the permit
- Knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit (including monitoring reports or reports of compliance or noncompliance)



► Liability



► Part B III- Other Responsibilities

- Right of entry
- Permit transfer
- Duty to reapply



Part C – Other Requirements

➤ Special conditions specific to your permit:

- Carefully Read and Understand these conditions

➤ Common requirements:

- If the DEP determines a nuisance condition, we will require remedial actions
- No stormwater in your separate sanitary sewer system
- Specific analysis methods
- Change in ownership
- Sludge disposal
- Supplemental forms



Part A I – Discharge Limits-Stormwater

➤ Stormwater

- Minimal sampling requirement
- Indicator pollutant
- Anticipate a storm event to collect the required sample



▶ What other information must I submit with the DMR?

- *Daily Effluent Monitoring
- *Influent & Process Control
- *Hauled in Municipal Wastes
- *Biosolids Production and Disposal
- *Chemical Additives Usage
- *Non-Compliance Reporting
- *Land Application Systems
- *CSO Detailed Report
- *Storm Water Additional Information
- *Groundwater Monitoring Data Report
- *Storm Water Annual Inspection Form
- *Surface Water Monitoring Data Report
- *Nitrogen Budget
- *Phosphorus Budget
- *Annual Nutrient Summary
- *TMDL Annual Load Summary
- *CSO Monthly Summary Report
- *Hauled in Residual Wastes
- *Nutrient Monitoring
- *Lab Accreditation Form



▶ QUESTIONS?