

General and Zero-discharge Permits: Application and Examples

California Regional Water Quality
Board
Colorado River Basin Training
April 2010



Types of Control Mechanisms (Permits)

▶ Individual Permits

- Permit issued to a specific industrial or commercial user to ensure compliance with applicable Pretreatment Standards and Requirements

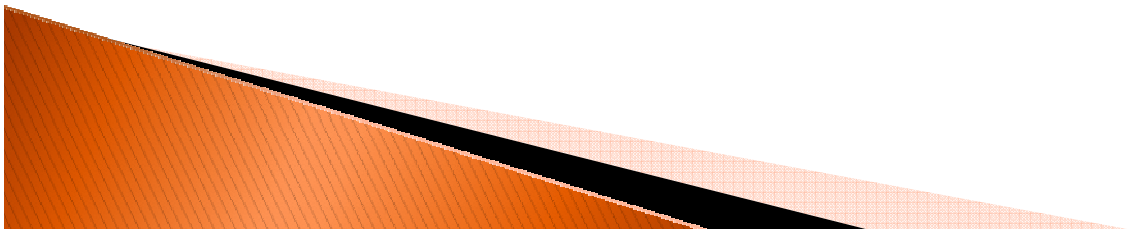
▶ General Permits

- At the discretion of the POTW, a general permit may be issued if certain conditions are met

▶ Zero Discharge Permits

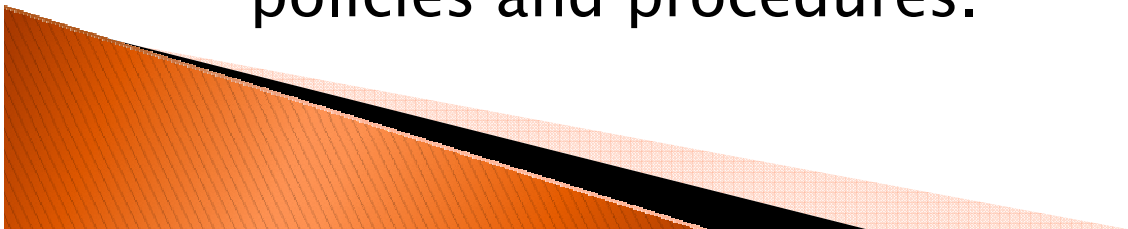
- Permits issued to SIUs or other users to ensure that the facility is aware of Pretreatment Standards and Requirements. Normally includes requirement to submit a Zero Discharge Certification to the POTW

▶ Other: Tiered Permits



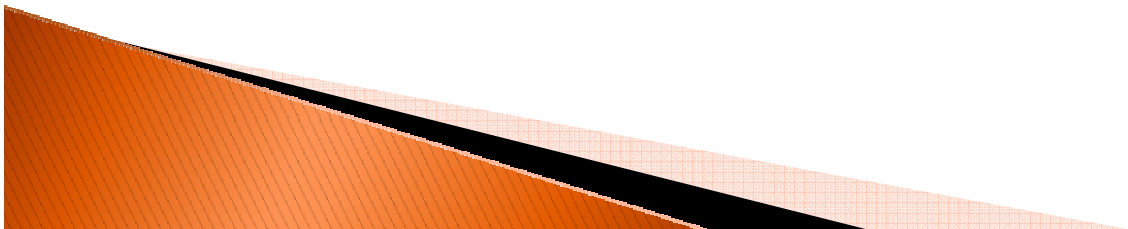
Questions before we continue...

- ▶ Does the City have the authority to issue general permits to SIUs?
 - The 2005 changes to the General Pretreatment Regulations [40 CFR Part 403] allow POTWs with approved pretreatment programs to use general permits to regulate the activities of groups of SIUs.
 - A POTW must have the necessary legal authority to issue general permits to SIUs. This includes the adoption of ordinance language consistent with 40 CFR 403.8(f)(1)(iii) and the development of any policies and procedures.



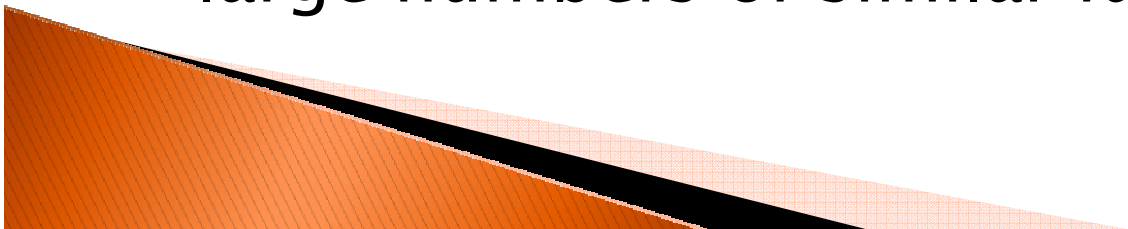
Questions before we continue...

- ▶ Does the City have the authority to issue general permits to non-SIUs?
 - There are no federal requirements regarding general permits for non-SIUs.
 - A POTW must have the necessary legal authority to issue general permits to non-SIUs.



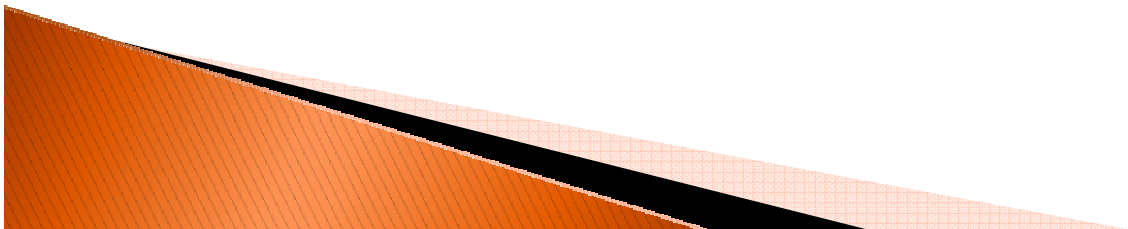
Why General Permits?

- ▶ To ensure nondomestic users are aware of sewer discharge regulations
- ▶ To regulate the activities of groups of similar dischargers
- ▶ To ensure consistent permit conditions for similar facilities
- ▶ To provide a cost-effective method to cover large numbers of similar facilities



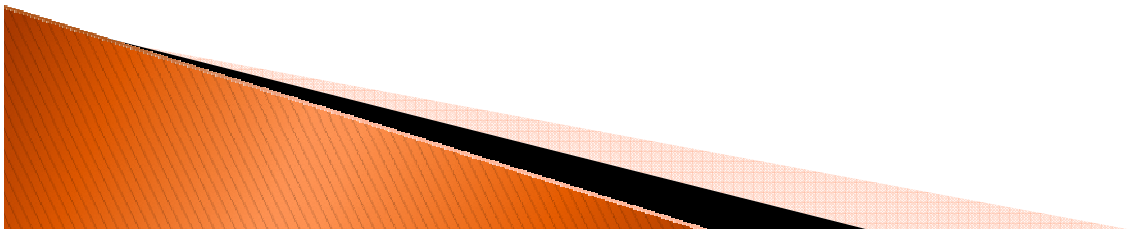
Eligible for general permits?

- ▶ SIUs that are [40 CFR 403.8(f)(1)(iii)(A)(1)]
 - Involved with same or similar types of operations
 - Required to have the same effluent limitations
 - Required to have the same or similar monitoring
 - In the opinion of the POTW, are more appropriately controlled under a general control mechanism



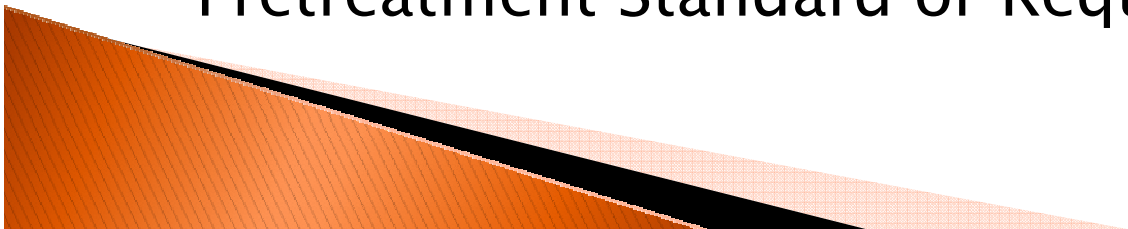
SIUs ineligible for general permits

- ▶ Facilities regulated by categorical standards expressed as mass limits
- ▶ SIUs whose limits are based on either
 - Combined wastestream formula
 - Net/gross calculations
 - Other calculated categorical Pretreatment Standard equivalents



Significant Industrial Users (SIUs)–Defined

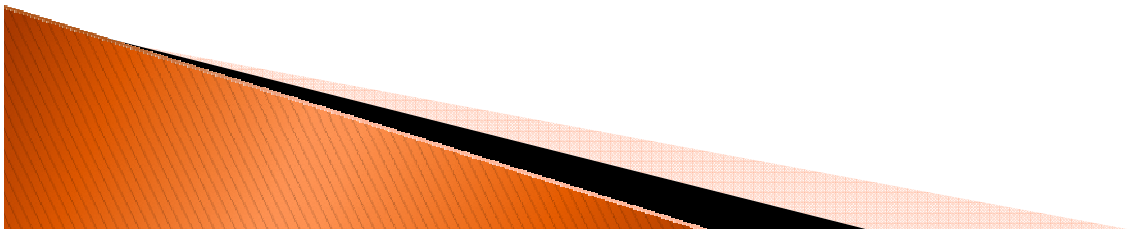
- ▶ All industrial users subject to Categorical Pretreatment Standards (CIUs)
- ▶ Any industrial user that discharges an average of 25,000 gallons per day or more of process wastewater to the POTW
- ▶ Any industrial user that contributes a process wastestream which makes up 5% or more of the average dry weather hydraulic or organic capacity of the POTW.
- ▶ Any industrial user designated by the POTW as having a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or Requirement



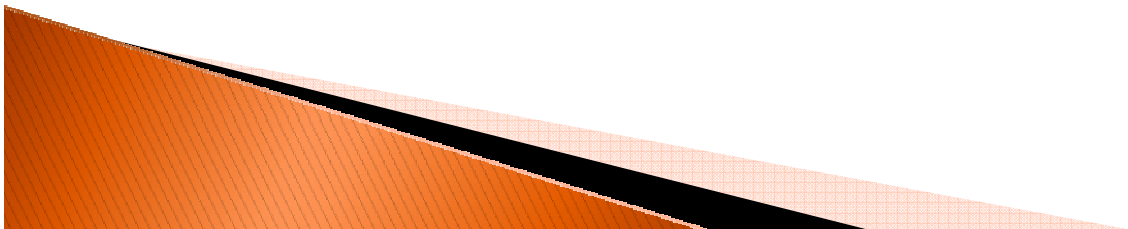
Other facilities to consider for general permits

▶ Non-SIUs


- Food service establishments (restaurants)
- Dry cleaners
- Dentists
- Hospitals and medical clinics
- Photo processors
- Newspaper and print shops
- Car wash facilities
- Auto maintenance facilities



General Permit Content

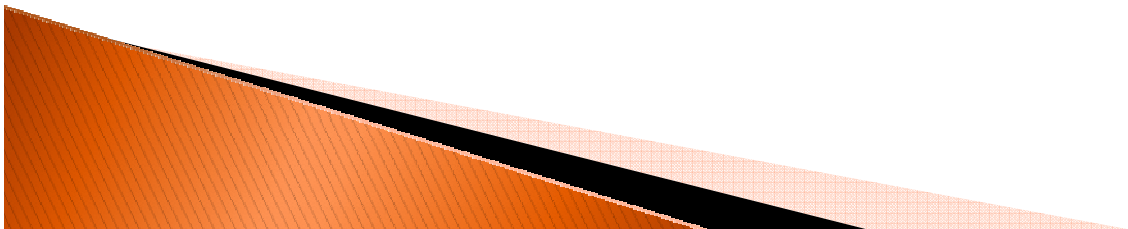


General Permit Content for SIUs

- ▶ Statement of Duration (no more than 5 yrs)
 - ▶ Statement of non-transferability
 - ▶ Effluent limits, including Best Management Practices
 - ▶ Self-monitoring, sampling, reporting, notification, and recordkeeping requirements
 - ▶ Requirements to control slug discharges, if determined by the POTW to be necessary
 - ▶ Statement of applicable civil and criminal penalties for violation of standards
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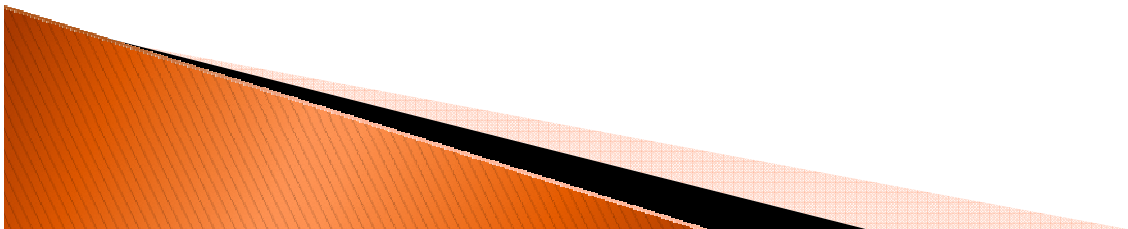
Facility-specific requirements in general permits for SIUs

- ▶ The POTW should consider how it will memorialize certain facility-specific factors:
 - Sampling locations
 - Monitoring waivers, if applicable



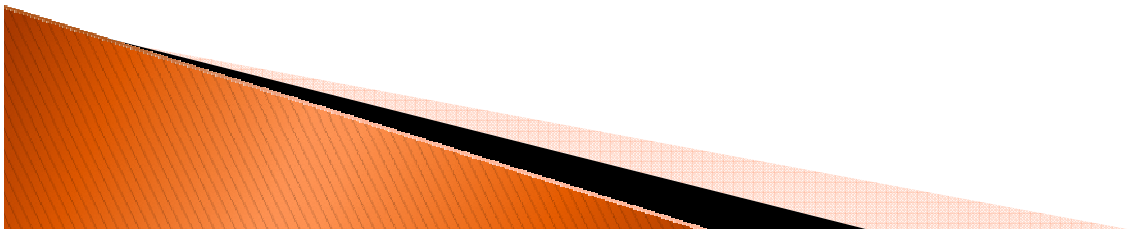
General Permit Content for Non-SIUs

- ▶ There are no minimum federal general permit content requirements for non-SIUs
- ▶ Strongly recommend that general permits for non-SIUs contain the same content as those for SIUs
- ▶ General and specific prohibitions [40 CFR 403.5]
- ▶ Specific BMP requirements



Example BMPs: Maintenance Shop

- ▶ Good Housekeeping
 - Sweep Floors, keep debris out of trenches
 - Dispose of trash, papers properly
- ▶ Spill Prevention
 - Close containers, keep isles clear, haz-com training
- ▶ Spill Clean-up
 - Containment, absorbent, granular, pads, sock
 - Dispose of spilled material properly
 - Hazardous – solvents, antifreeze, break fluid, etc.
 - Non-Hazardous – motor oil, grease, diesel



Maintenance Shop (cont'd)

▶ Trench Maintenance

- Keep Debris out of Trench
- Sweep Floors
- Blockage can cause standing water, stagnant, odor
- Shovel solids into non-hazardous drum for later disposal

▶ Floor Scrubber

- Do not discharge to trenches
- Separate water from debris
 - Drain water to wash bay sump
 - Put solids into non-hazardous drum

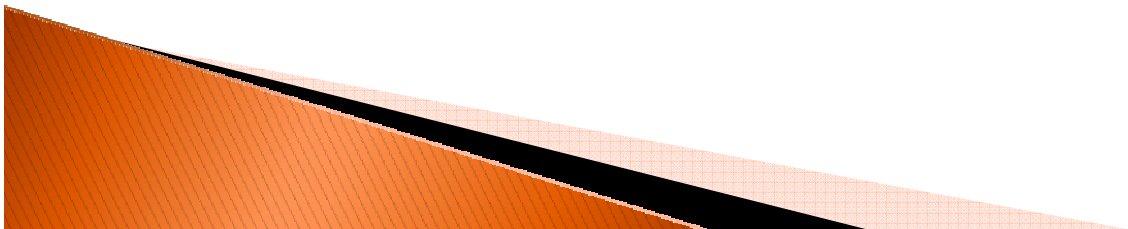
▶ Shop Rag Recycling

- Note: Where does facility send shop rags to be cleaned?




Example BMPs: Food Service Establishment

- ▶ Do NOT pour any grease into sinks, floor drains, mop sinks or any other drain.
- ▶ Recycle waste cooking oil, dispose in recycle bin or container
- ▶ Post “No Grease” signs above all kitchen sinks to remind employees.
- ▶ “Dry Wipe” or scrape food particles and grease residue from pots, pans, plates and disposed in trash.

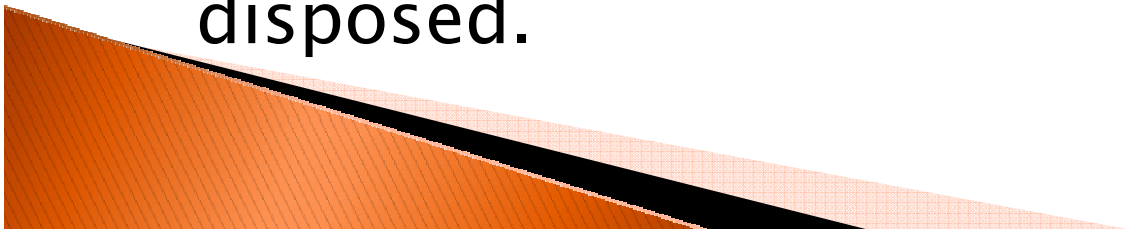


Example BMPs: Food Service Est. (continued)

- ▶ Use Strainers in sink drains and floor drains to prevent sewer line blockages
 - ▶ Use dry clean up methods (oil absorb material, rags, etc...) for any oils or grease spills. Do NOT wash oil or grease into drains
 - ▶ Food grinder use is discouraged due to build up of solids, oils, and grease in the sewer pipe.
 - ▶ Educate and Train all employees on grease control and preventing sewer pipe clogs and sewer overflows.
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Example Permit Conditions: Food Service Est. (continued)

- ▶ Grease interceptor pumping frequency:
 - Every 90 days or when the FOG level and food solids level exceed 25% of the capacity of the interceptor.
- ▶ Keep records of grease interceptor maintenance.
- ▶ Grease Trap (under the sink or floor units) must be cleaned every 2 weeks.
- ▶ Keep records of cleaning and volume disposed.



Permit Language

To Express

Is required to

Is required not to, is not allowed

Has discretion to, is permitted to

Is not permitted to

Ought to

Future contingency

Use

must

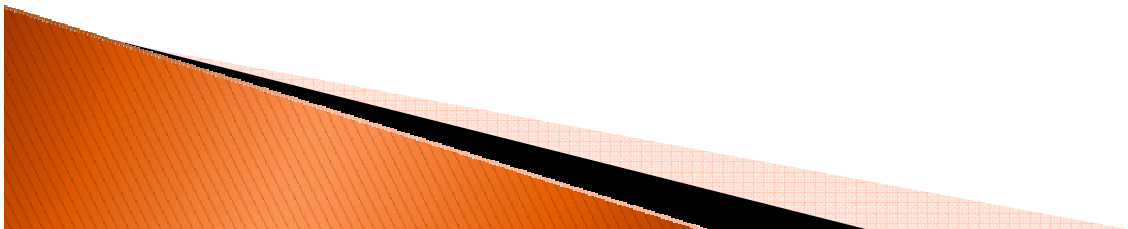
must not

may

may not

should

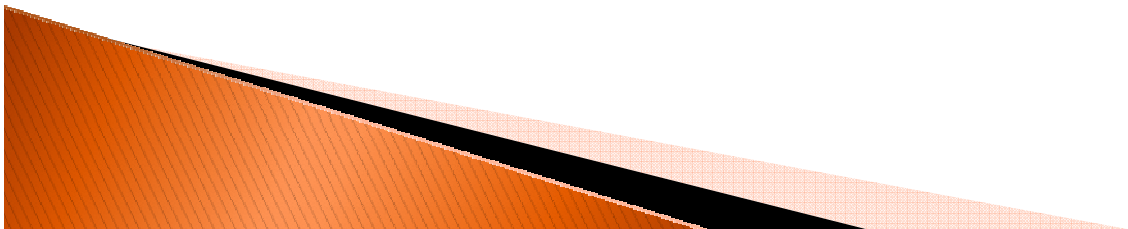
will



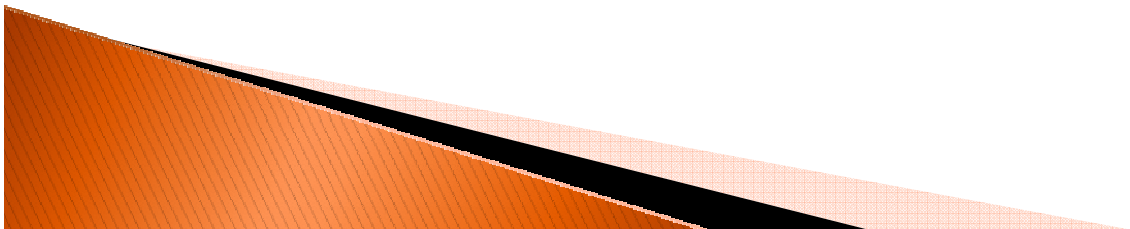
Other permitting considerations

▶ Document Permit Decisions

- Explains permitting rationale
- Creates permanent record in case of personnel changes
- To explain permit requirements and basis to the industrial user

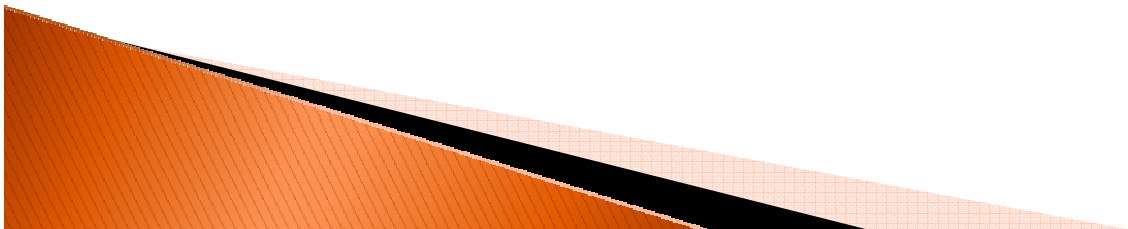


Implementation and Issuing General Permits



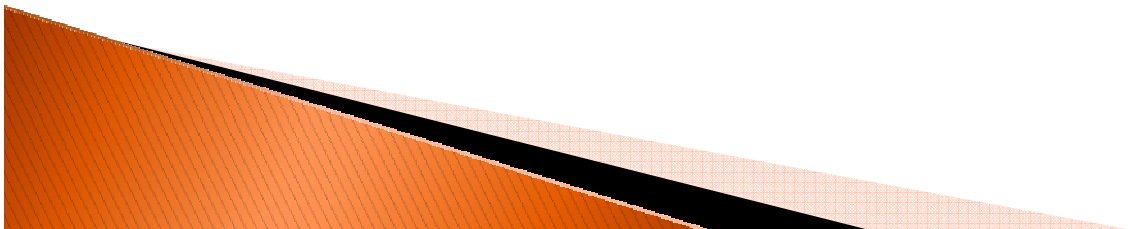
How do you make users aware of requirements?

- ▶ Inspections
 - Can also assist the POTW in verifying process operation and obtain requirement information
- ▶ Industrial Waste Survey
 - IU survey forms
 - Follow-up inspections
- ▶ Informational letter to users regarding the availability of general permits



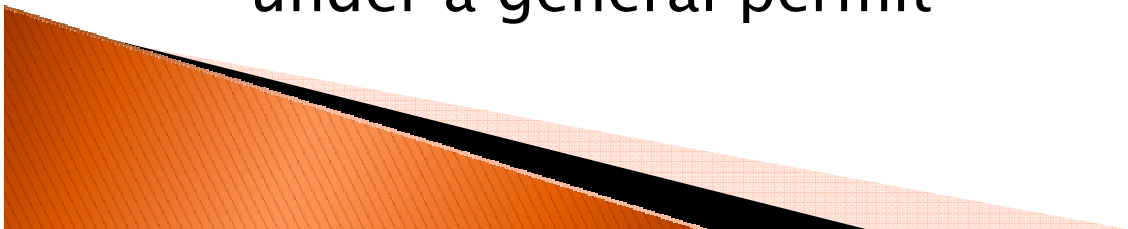
Implementation Requirements for SIUs

- ▶ A SIU must file a written request for coverage under a general permit
- ▶ Request must include
 - Contact information
 - Production processes
 - Types of waste generated
 - Location for monitoring all wastes
 - Any request for monitoring waivers, if allowed by local pretreatment program



Implementation Requirements for SIUs (continued)

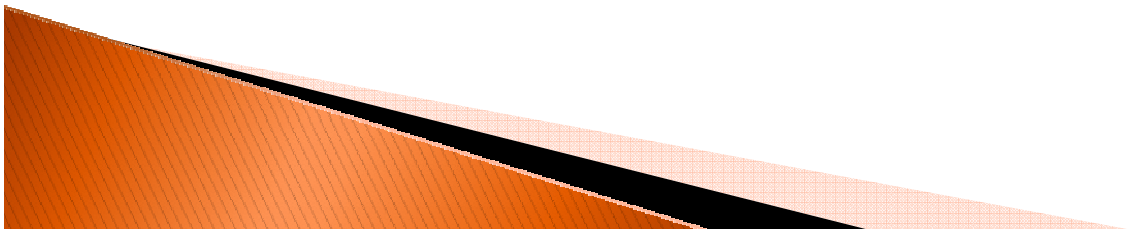
- ▶ The POTW is required to retain the following for 3 years after the expiration of the general permit
 - Copy of the general permit
 - Documentation to support the POTW's determination that a specific SIU meets the criteria listed at 403.8(f)(1)(iii)(A)(1–5)
 - Copy of the SIU's written request for coverage under a general permit



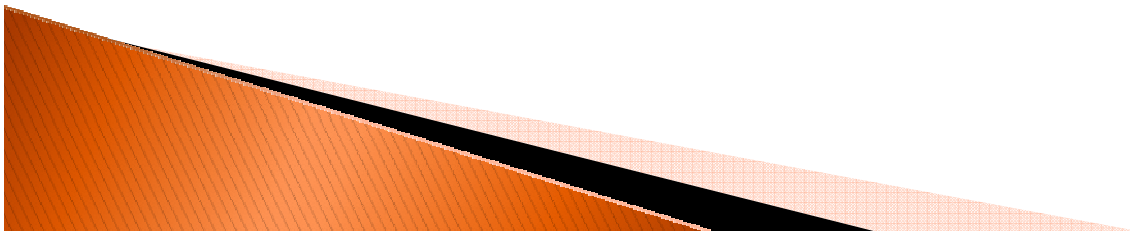
Example Scenario

- ▶ Company A & Company B are both industrial laundries and have requested coverage under a General Permit
- ▶ Company A washes restaurant and hotel linens, and floor mats
- ▶ Company B washes uniforms and towels

Should these facilities be under the general permit for laundries? What questions would you ask to determine this?

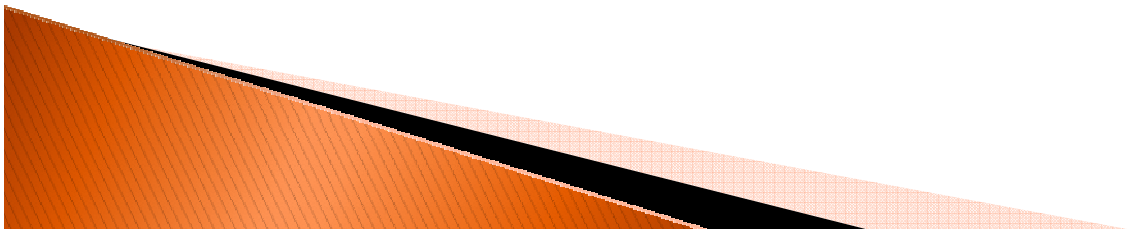


Zero-Discharge Permits



Zero Discharge Permits

- ▶ Are recommended for any CIU that does not discharge any process wastewater
- ▶ A zero discharge permit issued to a CIU with no process wastewater discharge allows the City to prove that it is making the CIU aware of all applicable pretreatment standards, and is adequately identifying and classifying industrial users (40 CFR 403.8(f)(2)(i and iii).



Zero Discharge Permits

- ▶ City or POTW should include requirement for the CIU to sign and submit a zero discharge of process wastewater certification statement
- ▶ Also, the City should conduct, at a minimum, an annual inspection of the CIU to verify no process discharge.

