



DeKalb County
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DEPARTMENT OF WATERSHED MANAGEMENT

ENGINEERING AND CONSTRUCTION MANAGEMENT SERVICES

INDUSTRIAL PRETREATMENT PROGRAM STAKEHOLDER'S WORKSHOP

Wednesday, March 4, 2020

Reginald D. Wells
Director

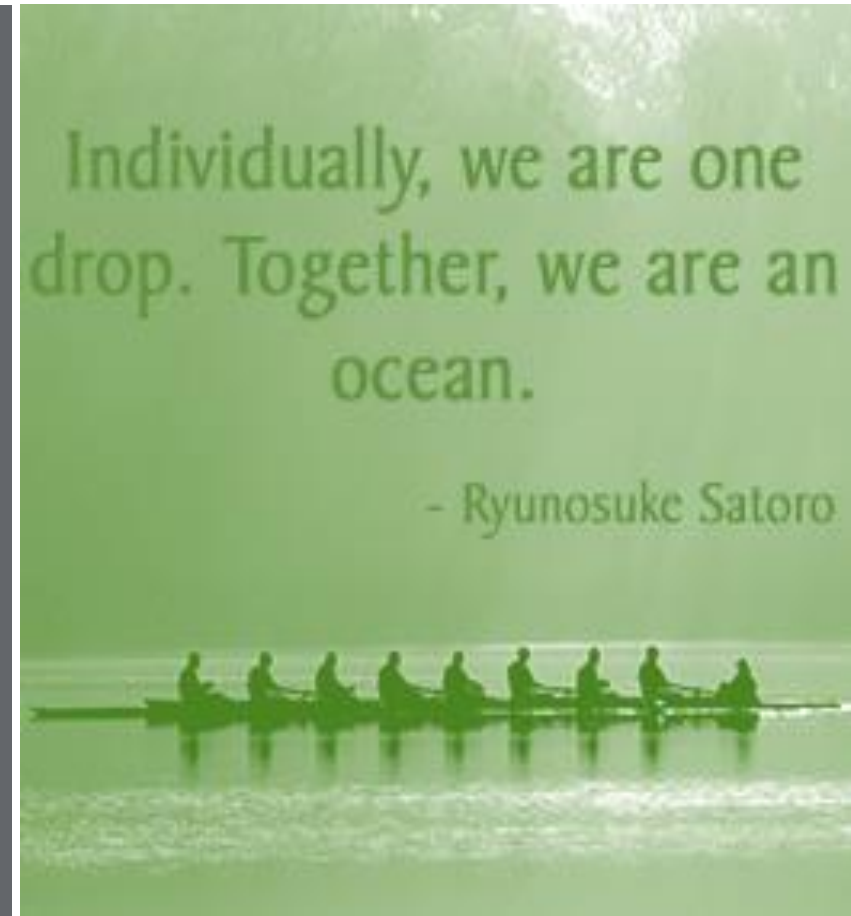


- Meeting Objectives
- Organization and Background
- Industrial Pretreatment Program (IPP) Requirements
- Permitting Process
- Fees and Surcharges
- New Local Limits
- Understanding the Permit
- Self-Monitoring and Reporting
- Sampling and Inspection Process
- Enforcement Process
- Program Future



MEETING OBJECTIVES

- **EDUCATE** Industrial Users within DeKalb on how to do business with the Department of Watershed Management (DWM)
- **IMPROVE** communication between the Department and stakeholders
- **PRESENT** programs, policies, and procedures
- **PROVIDE** a collaborative environment for feedback and questions and build a working relationship





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DEKALB COUNTY DEPARTMENT OF WATERSHED MANAGEMENT

Brent Zern, Assistant Director

Organization & Background



• WHAT WE DO...

- Serve 740,000+ DeKalb County residents
- Treat up to 90 Million Gallons per Day (MGD) finished drinking water
- Distribute up to 85 MGD of safe drinking water
- Treat up to 56 MGD of wastewater
- Maintain over 5,000 miles of water distribution and sanitary sewer collection piping
- Collect ~ \$243M per year in revenue
- Maintain a 95% Collection Rate

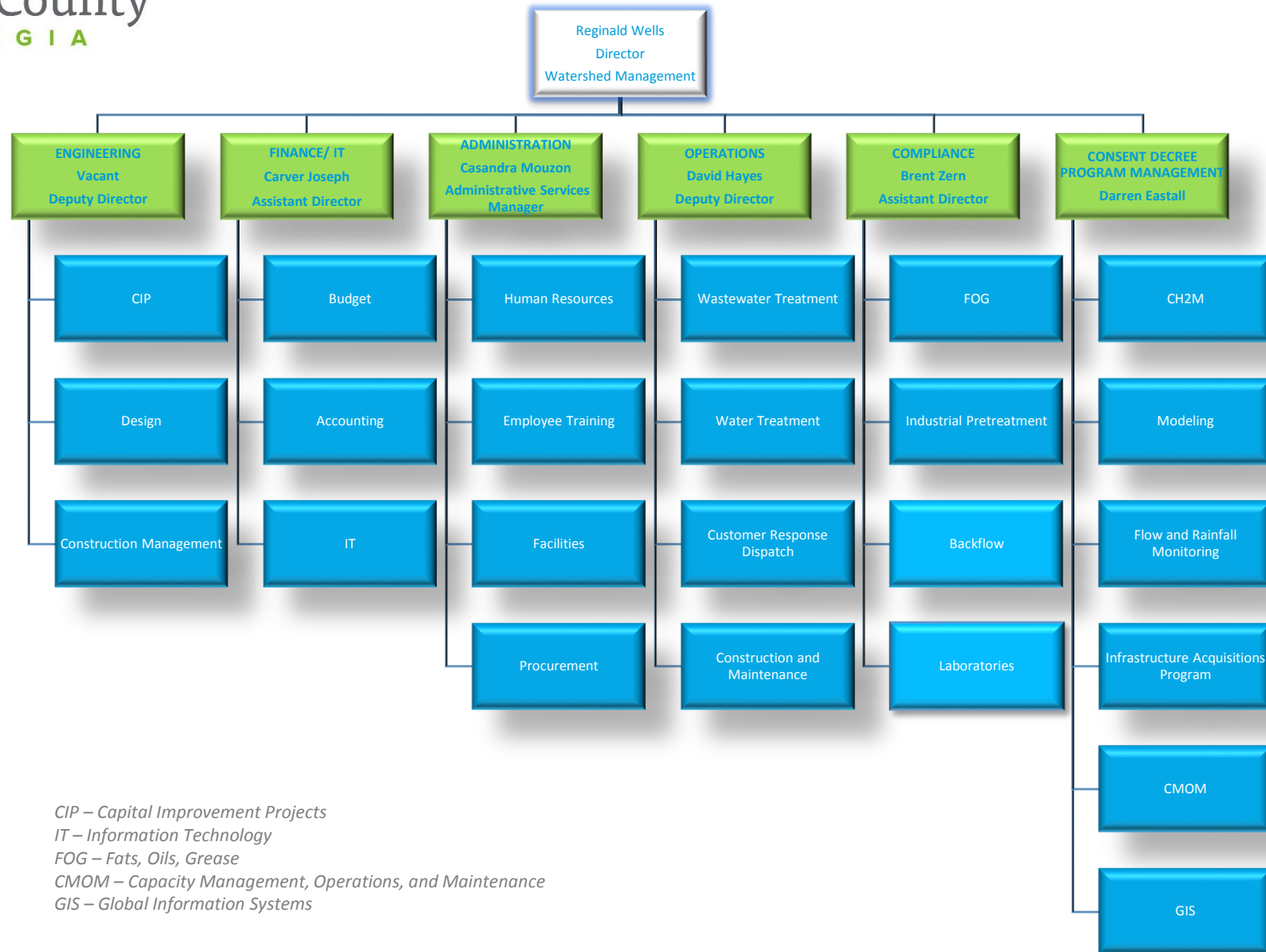
Intake river water from the environment

Treat and produce safe, clean drinking water

Distribute drinking water to customers

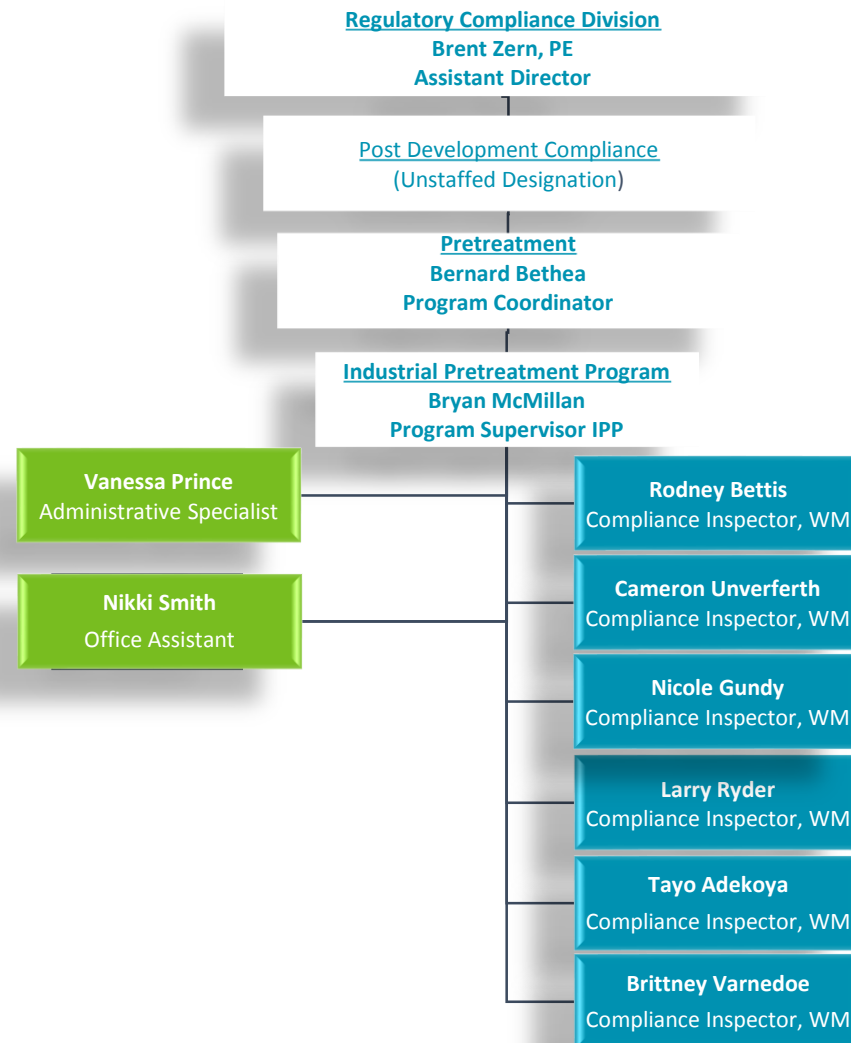
Collect wastewater from customers

Treat wastewater and return to the environment



CIP – Capital Improvement Projects
IT – Information Technology
FOG – Fats, Oils, Grease
CMOM – Capacity Management, Operations, and Maintenance
GIS – Global Information Systems

IPP ORGANIZATIONAL CHART





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IPP REQUIREMENTS

Bernard Bethea, Pretreatment Coordinator

OVERVIEW



PRETREATMENT 101

- **Only** environmental program where EPA has authorized local governments directly to implement and enforce Federal Regulations
- First enacted in 1972 (Federal Water Pollution Control Act) (Also known as the Clean Water Act)
- Part of the National Pollutant Discharge Elimination System (NPDES) Program
- National Industrial Pretreatment Program was an enhancement (June 1978)
- General Pretreatment Regulations 40 CFR Part 403 (January 1981)



- Regulates discharges **from non-domestic sources** to publicly owned treatment works (POTWs) (AKA, indirect discharges)
- Indirect dischargers & the POTW must comply with program
- DeKalb County is obligated to maintain and implement our program as part of our NPDES permits

COMPLIANCE



GENERAL PROHIBITIONS

Prohibits introducing a pollutant into the POTW:

- That will cause **pass through** or **interference**.
- Any Hazardous Wastes

Pole Bridge Creek AWTF



Snapfinger Creek AWTF



Snapfinger Creek AWTF
Expansion





WHICH INDUSTRIES MUST WE REGULATE?

- Categorical Industrial Users
- Significant Industrial Users
 - Discharge > 25,000 gpd of process wastewater
 - Contribute 5% or more of hydraulic or organic capacity
 - “Reasonable potential” to adversely affect or violate



WHICH INDUSTRIES CAN WE REGULATE?

- Any other non-domestic user

WHAT ARE WE REQUIRED TO DO?

- Create/implement a program
- Conduct inspections/sample
- Require self-monitoring reports
- Maintain compliance monitoring database
- Enforce requirements
- Develop, enforce, and update local limits
- Report to EPD at least annually





- Program elements, tools, and templates
 - Available on website:
<https://www.dekalbcountyga.gov/watershed-management/industrial-pretreatment-program>
- Actively coordinating with other jurisdictions
- Dedicated team with redundancy
- **Strictly** enforcing requirements
- Reviewing permit applications and permits



WHAT ARE YOU SEEING?

- More communication
- More inspections/sampling
 - Unscheduled
- Updated permits
- Enforcement of requirements
- Coordinated efforts between jurisdictions
- Internal standardization



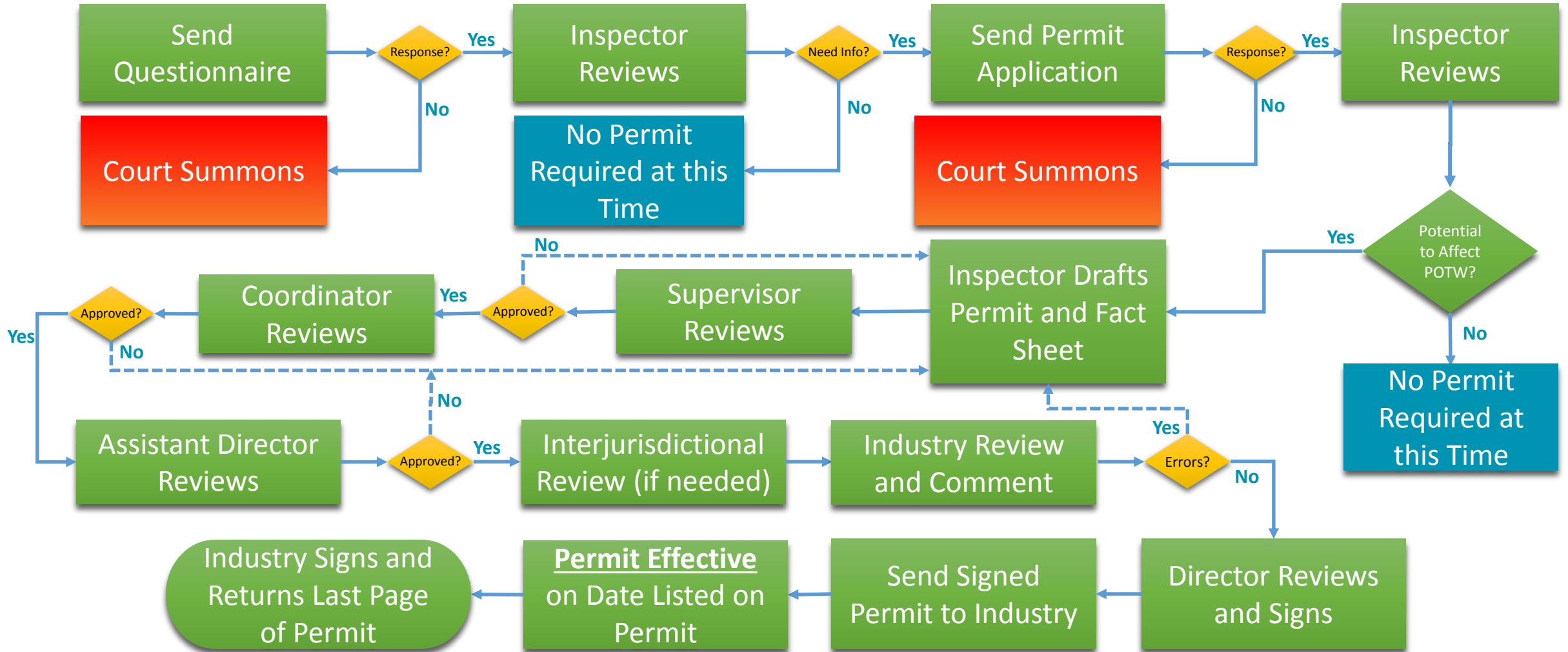
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PERMITTING PROCESS

Bryan McMillan, Program Supervisor



Permitting Process Flow





PERMITTING PROCESS

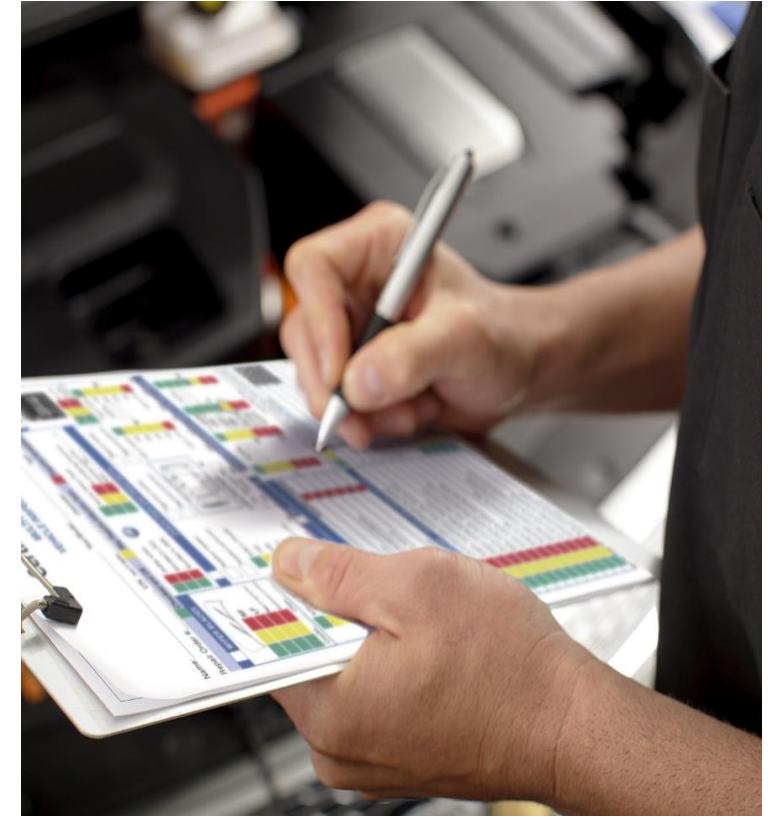
- Questionnaire
- Survey/Inspection
- Permit application
- Permit application review
- Draft permit
- Final permit
- As needed...compliance schedule





QUESTIONNAIRE

- Documentation only
- Initial fact gathering
- Review water usage
- Identify potential pollutants
- Review processes
- Review best management practices





SURVEY/INSPECTION

- Physical review
- Requires entry of facility
- Special security concerns
- DWM is not required to **and will not** sign waivers





PERMIT APPLICATION

- Primary fact gathering tool
- Does not guarantee a permit will be issued
- DWM needs information on:
 - Who to contact and who is responsible
 - Process
 - Potential pollutants
 - Baseline monitoring
 - Pretreatment system(s)
 - Plumbing
 - Building as-built plans
 - Plumbing survey



Department of Watershed Management
Industrial Pretreatment Program

4572 Memorial Drive
Decatur, Georgia 30032
(404) 687-7150
(404) 687-7167 Fax
JPP@DeKalbCountyGA.gov

Industrial Wastewater Discharge Permit Application

Name of Company: _____

Facility Address: _____

Applicant Contact Person: _____

Phone#: _____ Fax#: _____ E-Mail: _____

Mailing Address (if Different): _____

Responsible Official (Per 40 CFR 403.12(1)(3)(ii): _____ Title: _____

If Signatory Authority is delegated, Delegate: _____ Title: _____

Does your company presently have an Industrial Wastewater Discharge Permit with DeKalb County, Department of Watershed Management? Yes No

If yes, Permit # _____



PERMIT APPLICATION ISSUES WE SEE

- Not complete
 - No site plans
 - No process flow diagrams
 - No listing of chemicals
- Not accurate
 - Initial
 - Every pollutant believed absent
 - Renewals
 - “Known absent” reported on pollutants found present in previous analytical data
 - Process diagrams do not reflect current operations
- Not signed by responsible official





PERMIT APPLICATION REVIEW

Our process:

- Assigned to a “primary inspector”
- Reviews:
 - Questionnaire and application(s)
 - Compliance history
 - Monitoring results
 - Sewer issues in area
 - Categorical standards
 - Similar operation permits
- Develops fact sheet
 - Basis of permit
- Develops draft permit



- Primary Compliance Inspector
 - Team review
 - Gwinnett County/City of Atlanta (COA)/Fulton County review, if applicable
- Final draft issued
 - Industry review
- Permit issuance
 - Director review and sign



- Contains limits on what you can discharge
- Monitoring and reporting requirements
 - Look at Special Conditions
- Ensures that the discharge does not interfere with the POTW, degrade water quality or create a public health issue
- Who - What - When - Where - Why - How





COMPLIANCE SCHEDULE

- Not usual
- Required when additional pretreatment and/or operations and maintenance needed
 - Increments of progress
 - Progress reports
 - Compliance Report (final)



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FEES & SURCHARGES

Bryan McMillan, Program Supervisor



- Permit Evaluation - \$250
- Resample Fee - \$300
- Permit Violation - \$100
- Permitted Parameter above Permit Level - an “additional” charge per 1,000 gallons for each unit of permitted parameter in excess of permit limit - \$0.05



- BOD₅ - an “additional” charge per 1,000 gallons for each mg/L of BOD in excess of 250 mg/L – \$0.0006
- TSS - an “additional” charge per 1,000 gallons for each mg/L of TSS in excess of 250 mg/L – \$0.0006
- Phosphate -phosphorus (PO₄-P) - an “additional” charge per 1,000 gallons for each mg/L of P in excess of 10 mg/L - \$0.024
- Ammonia Nitrogen (NH₄-N) - an “additional” charge per 1000 gallons for each mg/L of NH₃ in excess of 30 mg/L – \$0.006
- Oil and Grease (O&G) - an “additional” charge per 1,000 gallons for each mg/L of O&G in excess of 100 mg/L – \$0.05



An industry is permitted for daily pH, daily flow, and once a week sampling for BOD, TSS, Phosphorus, Ammonia, and O&G. The industry failed to submit the SMR. The fee for a permit violation is \$100 per violation.

pH	Flow	BOD	TSS	Phos	Amm	O&G	SMR
----	------	-----	-----	------	-----	-----	-----

$(30 \times \$100)(30 \times \$100)(4 \times \$100)(4 \times \$100)(4 \times \$100)(4 \times \$100)(4 \times \$100)(1 \times \$100) = \$8100$

Total Fees - \$8,100



For Example: DWM laboratory analysis for BOD₅ was 15,587 mg/L and O&G was 400 mg/L (permitted for 100 mg/L) at an industry discharging 7 Million gallons per month.

BOD₅ Surcharge Calculation - $(15,587 - 250)(7,000,000 / 1000)(0.0006) = \$64,415.40$

O&G Surcharge Calculation - $(400 - 100)(7,000,000 / 1000)(0.05) = \$105,000$

O&G Permitted Parameter Fee Calculation - $(400 - 100)(7,000,000 / 1000)(0.05) = \$105,000$

Total Surcharges and Fees Calculation - $\$64,415.40 + \$105,000 + \$105,000 = \$274,415.40$

Total Surcharge - \$274,415.40



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NEW LOCAL LIMITS

Bryan McMillan, Program Supervisor



PUBLIC NOTICE

Local Pretreatment Program Approval

In accordance with Chapter 391-3-6-.09, Rules and Regulations for Water Quality Control, notice is hereby given of approval by the Georgia Environmental Protection Division of changes to a local pretreatment program for DeKalb County covering the Polebridge Creek Advanced Wastewater Treatment Facility (GA0026816) and the Snapfinger Creek Advanced Wastewater Treatment Facility (GA0024147). The pretreatment program provides for the administration and enforcement of pretreatment standards for industrial users of the publicly owned treatment works.

DEKALB COUNTY RECEIVING TREATMENT PLANTS

Table E-1. Summary of Local Limits Local Limits Evaluation, DeKalb County DWM			
Pollutant	Proposed Local Limits (mg/L)		
	Discharges to Pole Bridge AWTF	Discharges to Snapfinger AWTF	All Discharges to DeKalb County Sewers ^a
Conventional Pollutants			
Ammonia (NH ₃ as N)	3,732	65	-----
Biochemical Oxygen Demand (BOD)	20,011	1,565	1,000
Chemical Oxygen Demand (COD)	-----	-----	2,000
Phosphorus, Total (as P)	768	43.8	-----
Suspended Solids, Total (TSS)	203,475	7,978	1,000
Inorganic Pollutants			
Arsenic	0.24	0.028	-----
Cadmium	0.005	0.005	-----
Chromium III	4.07	0.75	-----
Chromium VI	0.77	0.16	-----
Copper	6.56	0.017	-----
Cyanide	0.082	0.082	-----
Lead	0.53	0.081	-----
Mercury	0.002	0.002	-----

Table E-1. Summary of Local Limits Local Limits Evaluation, DeKalb County DWM			
Pollutant	Proposed Local Limits (mg/L)		
	Discharges to Pole Bridge AWTF	Discharges to Snapfinger AWTF	All Discharges to DeKalb County Sewers ^a
Molybdenum	3.60	0.34	-----
Nickel	2.56	0.11	-----
Selenium	0.34	0.025	-----
Silver	0.071	0.005	-----
Zinc	0.67	0.094	-----
Organic Pollutants			
Polychlorinated Biphenyls (PCBs) ^b	-----	0.0000358	-----
Other Parameters			
Oil and Grease	100	100	100
pH	-----	-----	Minimum of 6
Sulfate	-----	-----	50
Sulfide, Dissolved	-----	-----	1

GWINNETT COUNTY RECEIVING TREATMENT PLANTS

Pollutant	Daily Maximum Limits for Monthly Average Flows Greater than 10,000 gpd	Monthly Average Limits for Monthly Average Flows Equal to or Less than 10,000 gpd
Arsenic	0.43 mg/l	0.0357 pounds/day
Cadmium	0.11 mg/l	0.0092 pounds/day
Chromium	2.77 mg/l	0.2310 pounds/day
Copper	3.38 mg/l	0.2819 pounds/day
Lead	0.60 mg/l	0.0500 pounds/day
Mercury *	0 mg/l	0 pounds/day
Nickel	2.80 mg/l	0.2333 pounds/day
Selenium	4.19 mg/l	0.3496 pounds/day
Silver	0.43 mg/l	0.0359 pounds/day
Zinc	2.61 mg/l	0.2177 pounds/day
Five-Day Biochemical Oxygen Demand (BOD ₅)	2,700 mg/l	225 pounds/day
Total Suspended Solids (TSS)	3,000 mg/l	250 pounds/day

Pollutant	Daily Maximum Limits for Monthly Average Flows Greater than 10,000 gpd	Monthly Average Limits for Monthly Average Flows Equal to or Less than 10,000 gpd
Ammonia Nitrogen (NH ₃ -N)	200 mg/l	17 pounds/day
Total Kjeldahl Nitrogen (TKN)	320 mg/l	27 pounds/day
Phosphorus, Total	60 mg/l	5 pounds/day
Instantaneous Maximum Limits		
Cyanide	0.83 mg/l	
Fats, Oils and Grease (FOG)	150 mg/l	
pH	5.0 - 12.5 s.u.	
Temperature	140 deg F	
Total Toxic Organics (TTO)	2.13 mg/l	




DeKalb County
GEORGIA

Understanding the Permit PART I

Cameron Unverferth, Compliance Inspector



THE PERMIT IN SIMPLE TERMS


 DeKalb County
 GEORGIA
 DeKalb County Department of Watershed Management
 Office of Engineering and Construction Management Services
 Regulatory Compliance Division
 Pretreatment Section

**AUTHORIZATION FOR INDUSTRIAL DISCHARGE
 TO THE DEKALB COUNTY SEWER SYSTEM**

PERMIT NO. DK01234

In compliance with the provisions of the DeKalb County, Georgia Code of Ordinances Chapter 25, Georgia Annotated Code (GAC) 391-3-6 and the Federal Code of Regulations (CFR) Title 40 Part 403

ACME Incorporated, Tucker

Is authorized to discharge wastewater from a facility located at

**1234 ACME Street
 Tucker, GA 30084**

to the DeKalb County, Georgia sewers managed by the Department of Watershed Management (DWM).

Said discharge is subject to the effluent limitations, monitoring requirements, and other conditions set forth in this permit and the referenced ordinances.

This permit shall become effective

February 1, 2017

This permit and the authorization to discharge shall expire at midnight,

January 31, 2020

Signed this _____ day of _____, _____

 Richard Lemke, P.E.
 Director
 Department of Watershed Management

- **Become Thoroughly Familiar With Your Permit!**
- Effective date
 - Requirements effective immediately unless otherwise stated in permit
- Sections
 - I. Discharge Standards, Prohibitions, and Limits
 - II. Monitoring and Reporting
 - III. Industrial Wastewater Surcharges
 - IV. Special Conditions
 - V. Spill Notification Procedures, Slug, Loading
 - VI. Standard Conditions
 - VII. Compliance and Penalties



THE PERMIT: I. DISCHARGE STANDARDS, PROHIBITIONS, AND LIMITS

- Section I.A. - Here is what you can do with your industrial waste
- Section I.B. – Don't discharge above these to us
 - 1. **Don't cause us to violate our permits!**
 - 2. Don't discharge anything to us that is explosive, burns, is too viscous or large, is radioactive, or is otherwise hazardous
- Section I.C. – Dilution is NOT the solution
- Section I.D. – These are your limits and where they are from, effective immediately





THE PERMIT: II. MONITORING AND REPORTING

- Section II.A. - Here is how often you are required to sample; for what and when
 - This is what a day and week are
- Section II.B. – We sample your discharge too
 - We may do it more often, and probably will
 - Here is what we sample for and the minimum we will
- Section II.C. – This is the sample point
 - You have to use it... and so do we
- Section II.D. – Your samples should be representative, not only when your discharge is at its best
 - Flow proportional is most representative, grabs if analytical method requires
- Section II.E. – Report to us
 - On time please, no need to receive a violation for this
 - We accept email and mail

<u>Pollutant</u>	<u>Sample Frequency</u>	<u>Sample Type</u>
pH	Continuous	Meter, Daily Minimum and Maximum
Flow	Continuous	Meter, Daily and Monthly Totals
BOD ₅	2/Month	24-Hr. Flow Proportional Composite
COD	2/Month	24-Hr Flow Proportional Composite
Ammonia as N	2/Month	24-Hr. Flow Proportional Composite
TKN	2/Month	24-Hr Flow Proportional Composite
Phosphorus, Total	2/Month	24-Hr. Flow Proportional Composite
TSS	2/Month	24-Hr. Flow Proportional Composite
O&G-HEM	1/Week	Grab



The Permit: III. INDUSTRIAL WASTEWATER SURCHARGES

- Section III.A. – Surcharges apply to ALL industries
 - BOD, Phosphorus, TSS, Ammonia Nitrogen, and Oil & Grease
 - Surcharges are cost recovery, not punitive
- Section III.B. – This is how surcharges are calculated

BOD	An additional \$0.0006 per 1000 gallons for each mg/L of BOD in excess of 250 mg/L
TSS	An additional \$0.0006 per 1000 gallons for each mg/L of TSS in excess of 250 mg/L
Phosphorus	An additional \$0.024 per 1000 gallons for each mg/L of Phosphorus in excess of 10 mg/L
NH ₃	An additional \$0.006 per 1000 gallons for each mg/L of NH ₃ -N in excess of 30 mg/L
O&G-HEM	An additional \$0.05 per 1000 gallons for each mg/L of O&G-HEM in excess of 100 mg/L
Permitted Parameter above Permit Level	An additional \$0.05 per 1000 gallons for each unit of permitted parameter in excess of permit limit



THE PERMIT: IV. SPECIAL CONDITIONS

- Section IV – This is where any non-standard requirements can be found
 - Effective immediately unless otherwise stated
- Common special conditions:
 - Do you have pretreatment? If so a licensed operator may be required.
 - Do you haul waste for disposal? If so we may require you to prove how the waste is disposed.
 - Do you have a grease interceptor? We will require a minimum pumping cycle.
 - Have you tested for all priority pollutants in your discharge? We will require a priority pollutant scan.
 - Do you have a metering station? If not we will require you to install one.
 - Do you have dilution sources? If so we will require them to be separated from process



THE PERMIT: IV. SPECIAL CONDITIONS

METERING STATIONS



- **WHAT**
 - Sample Point
 - Flow Metering
- **WHY**
 - Access
 - Safety
 - Dilution
- We **CANNOT** recommend specific companies or brands
 - GAWP - <http://www.gawp.org>



THE PERMIT: IV. SPECIAL CONDITIONS

METERING STATIONS



- **REQUIREMENTS**

- Outside (rare exceptions made)
- 24/7/365 unimpeded access
- No confined space entry
- Open channel
- Process waste only, no dilution sources
- Flow monitoring
- Monitoring equipment compatible with DWM equipment
- Submit to DWM for approval

BEFORE INSTALLATION



THE PERMIT: IV. SPECIAL CONDITIONS

METERING STATIONS

- Flow Meter **required on discharge point** to DeKalb County's infrastructure
- +/- 5% accuracy across discharge range
- Flow weighted sampling
- Variety of acceptable devices
- Quarterly calibration required per Dekalb County Code of Ordinances Sec. 25-150.(3)

Flume with flow meter





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Understanding the Permit PART II

Brittney Varndoe, Compliance Inspector



THE PERMIT: V. SPILL NOTIFICATION PROCEDURES, SLUG LOADING

- Section V. – Tell us if you have a slug discharge within one hour
 - Within 5 days, give us a better explanation, in writing. Tell us what was released and how you are going to keep it from happening in the future.
 - Any permittee may be required to give us an accidental discharge/slug control plan whether you have had a spill or not
 - If you have a spill to sewer, immediately notify IPP and the wastewater plant listed in your permit
 - If you have a spill to a stream call the agencies listed



terrestrial gastropod mollusk





THE PERMIT: VI. STANDARD CONDITIONS

- Section VI.A. – Keep your records for at least three years, longer for issues
 - We can request them at any time
 - You may have to keep them longer if the Director requires for purposes of litigation
- Section VI.B. – We have regulation to comply with too
 - All information is available though open records requests
 - Information that is a trade secret must be requested and demonstrated as such to avoid release.
- Section VI.C. – You have to give us access
 - We need to inspect all areas that have waste that flows to sewer or contains records about such waste
 - We can sample
- Section VI.D. – Keep your pretreatment system working
- Section VI.E. – Don't make us upset... our wastewater plant that is
 - Negligence is not an excuse
 - Very specific requirements for upset to be defensible – up to you to prove
 - You may have to make temporary changes until a permanent solution can be implemented
 - Hauling, portable pretreatment, reduce or halt production



THE PERMIT: VI. STANDARD CONDITIONS

- Section VI.F. – Bypass – sending us waste not pretreated
 - Only if you have pretreatment
 - You can do it – ONLY if you meet your permit limits (Generally pretreatment is installed to meet limits)
 - Must be essential – planned maintenance should not create a bypass if it could be performed at other times
 - **Loss of production is not a valid reason to violate permit**
 - If it is planned and unavoidable, notify us 10 days before bypass
 - Provide corrective action plan if unintended bypass occurred
 - We will enforce for unnecessary bypasses
- Section VI.G. – Tells us of major changes 60 days before making them
 - We need information about change
 - We may modify the permit, require additional treatment, or deny permission to discharge based on the change.
- Section VI.H. – We can modify your permit... at our discretion
- Section VI.I. – We *may* transfer your permit with proper notice
 - Definitely will not without advanced notice



THE PERMIT: VI. STANDARD CONDITIONS

- Section VI.J. – We can revoke your permit for...
 - Making changes without telling us
 - Not giving all of the information required on the permit application
 - Falsifying reports
 - Tampering with our equipment
 - Impeding access
 - Not meeting limits
 - Not paying the bills
- Section VI.K. – If one part of the permit is deemed not enforceable, you still have to comply with the rest of the permit
 - Not meeting compliance schedules – we are giving you a chance to fix things
 - Not completing permit application or survey as required (AND we will take you to court)
 - Not notifying us that the business was sold ahead of time
 - Making changes that change your wastewater and are no longer acceptable for POTW discharge (at our sole discretion)
 - Not complying with the permit in any way
 - If we give you a new permit, your old permit is void



THE PERMIT: VII. COMPLIANCE AND PENALTIES

- Section VII.A. – You have to comply with the permit
- Section VII.B. – EPA, EPD, and DeKalb Ordinance require us to penalize you for violations
 - We will send you a Notice of Violation – Please read and respond within 15 days or you get ANOTHER violation
 - You are still liable for the violation
 - You may have to come to a Show Cause hearing to explain why we should let you continue to discharge



THE PERMIT: VII. COMPLIANCE AND PENALTIES

Delaware, announced that Lance A. Charen, a 52-year old resident of Blue Bell, Pennsylvania, was sentenced today by U.S. District Court Judge Gregory M. Sleet to one year and one day incarceration for environmental crimes.

Cease & Desist

According to court documents and statements made in court, from September 2010, through

IPC pled guilty to similar charges and was sentenced by Judge Sleet, on February 2, 1017, to a \$1,300,000 fine and \$2,200,000 in restitution to the City of Wilmington.

On June 22, 2017, Charen pled guilty to tampering with monitoring methods associated with IPC's monthly samples. More specifically, Charen admitted that on sampling days he caused

On June 22, 2017, Charen pled guilty to tampering with monitoring methods associated with IPC's monthly samples. More specifically, Charen admitted that on sampling days he caused the facility to significantly reduce the volume of wastewater treated, because slowing the treatment process rendered it more effective. Additionally, Charen pled guilty to violating

ensures that the defendant, the facility's highest on-site manager, is held accountable. "By falsifying sampling results and hiding the fact that he was shipping ignitable and hazardous waste, the defendant put public safety and the health of the environment at risk," said Jennifer Lynn, Assistant Special Agent in Charge of EPA's criminal enforcement program in Delaware. "This case demonstrates that EPA and its law enforcement partners are serious about protecting the health of our communities." This case was investigated by EPA's Criminal Investigation Division. The City of Wilmington Department of Public Works and the DNREC Solid & Hazardous Waste Management Section assisted in the investigation. The case was prosecuted by Special Assistant U.S. Attorney Martin Harrell, EPA Region 3, and Assistant U.S. Attorney Edmond Falgowski from the U.S. Attorney's Office.





THE PERMIT: VII. COMPLIANCE AND PENALTIES

- Section VII.C. – We publish significant violators in the AJC annually
- These things will get your company published (most companies are REALLY not happy about this):
 - Chronic – Frequency of violations
 - TRC – Magnitude of violations
 - You caused pass-through at one of our treatment plants
 - We had to use our emergency authority to stop your discharge
 - You didn't meet compliance schedule milestones
 - Even if an extension is granted
 - You are more than 30 days late on a report
 - You did not accurately report non-compliance





THE PERMIT: VIII. SCHEDULES

- Section VIII.A. – Compliance Schedules – we may give you time to become compliant
 - The permit is effective immediately
 - Violations will still be noted but we may not escalate enforcement actions
 - The schedule needs specifics including dates
 - Increments cannot exceed nine months and generally will be much shorter
 - Report to us when each milestone is completed
- Section VIII.B. – Permit is effective immediately (as dated on first page)
- Section VIII.C. – The longest permit length is five years (actually three until ordinance is modified)
 - Send a new permit application at least 120 days before your current permit expires



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SELF-MONITORING & REPORTING

Nicole Gundy, Compliance Inspector



SELF-MONITORING

- **Required for every permit**
- To be completed by the industry or a contractor hired by the industry
- **SELF**-Monitoring: DWM sample results may not be used in lieu of industry performed sampling
- Sample point identified in permit
 - Representative of Normal Discharge
- Use of certified lab or in-house lab analyst or Class 1/2 wastewater operator to perform tests
- Perform when and as often as required
- Use test methods approved in the Clean Water Act found in Title 40 CFR 136
 - Preserve properly
 - Use proper containers
 - Observe hold times
 - RCRA/SW-846 test methods may not be used unless there is not an approved method in the CWA, EPA clarified in the 2017 Methods Update Rule for the Analysis of Effluent that only the Regional ATP Coordinator can approve ATPs, not the state



SELF-MONITORING REPORT

- Generally required monthly
- Due by the 15th
 - April is due by May 15th
 - Significantly incomplete or illegible reports considered late if not corrected by due date
- Reporting more than 30 days late puts your industry in **Significant Non-Compliance**
 - Published annually
- All results are to be entered on DWM provided forms
 - Multiple forms may be used if needed
- All test results at sample point are required to be reported
- Filled completely and wet signed by Authorized Signatory
 - Delegation of Authority
- Supporting Documentation
 - **Complete** lab reports, flow logs/charts, pH logs/charts, waste manifests





DeKalb County
GEORGIA

SELF-MONITORING REPORT FORM

- Used to report daily pH and flow
 - Single daily pH readings may be reported in either Min or Max column.
 - Can be used to report other analysis
- Circle or highlight permit violations
- Note when there is zero flow, do not leave blank
- Indicate sample type sequentially
- Units reported should be as listed in permit (mg/L or lbs)

Industrial Waste Monthly Self-Monitoring Report

DeKalb County GEORGIA

Company Name: ACME Incorporated, Tucker Permit No.: DK01234 Discharge: _____
No.: 1

Send to: DeKalb County
Industrial Pretreatment Program
4572 Memorial Drive
Decatur, Georgia 30032
Phone: (404) 687-7150
Email: IPP@DeKalbcountyga.gov

Please Specify Month & Year: Month February Year 2018

All units are mg/L unless otherwise noted (units reported are to be the same as listed in the permit) This form is available at www.dekalbcountyga.gov/watershed-management/IPP

Sample Date	Sample Type C (Composite) G (Grab) BC (Batch)	pH		Lead	Copper	Zinc	BOD	TSS	Phosphorus	Ammonia	O&G	Daily Flow (GPD*) Industrial	Notes (Indicate Batch Discharges)
		Min	Max										
1	G	6.3	8.1									20,600	
2	G	7.0	8.1									11,625	
3	G	6.9	7.2									5,200	
4	G	10.6	11.0									64,123	
5	GCCCCCG	9.1	10.9	0.18	0.39	0.88	181	60	8.6	26.3	70	51,147	
6	G	8.7	9.9									116,230	
7	G	6.2	7.6									14,050	
8	G	4.8	6.0									1,200	
9	G	7.6	9.9									21,560	
10	G	6.6	7.4									52,870	
11	G	9.0	11.2									33,359	
12	GCCCCG	6.5	8.0				378	280	15.1	15.6	103	19,247	
13	G	9.1	9.6									6,932	
14	G	5.5	7.2									51,241	
15	G	7.0	8.5									18,475	
16	G	6.6	8.8									56,988	
17												0	No Production
18	G	5.8	11.0									23,387	
19	GCCCCG	9.6	10.3				475	300	10.8	4.3	16	41,790	
20	G	10.8	11.5									10,230	
21	G	8.9	9.8									84,620	
22	G	10.0	10.8									60,001	
23	G	6.2	7.6									41,301	
24	G	6.9	8.1									52,789	
25	G	7.2	9.9									950	
26												0	No Production
27	GCCCCG	9.5	11.1				152	66	7.6	14.1	55	14,652	
28		9.0	10.8									48,600	
29													
30													
31													
Monthly Min pH		4.8										Total Monthly Flow (gallons)	923,167
Monthly Max pH		11.5										Average Daily Flow	32,970

Please circle all permit violations

*GPD: gallons per day

Due Date: Monthly report is due by the 15th of each month

Revised 03/2017


Signature of Responsible Official or Duty Authorized Representative



DeKalb County
GEORGIA

SELF-MONITORING MONTHLY ANALYSES REPORTING FORM

- Used to report large number of test results such as Priority Pollutant Scans
 - Do not use for flow
 - Use as many forms as needed
- Circle or highlight permit violations
- Sign each form
- Units reported should be as listed in permit (mg/L or lbs)
- Reporting limits that are above permit limits are violations
 - Indicate "less than" reporting limit and circle or highlight (i.e. "<0.0003")


 Pretreatment Section
 Department of Watershed Management
 4572 Memorial Drive
 Decatur, Georgia 30032
 Phone # (404) 687-7150
 Email: IPP@dekalbcountyga.gov

Self Monitoring Monthly Analyses Reporting Form

Industry Name: ACME Incorporated, Tucker Date: 2/5/2018
 Address: 1234 ACME Street
Tucker, GA 30084 Permit No.: DK01234
 Discharge: _____
 Point: 1
 Reporting Month: February 2018

Analysis	Results	Sample type C (composite) G (grab) BC (Batch)
1,1,1 Trichloroethane	<0.0003	G
1,1,2 Tetrachloroethane	<0.0003	G
1,1,2 Trichloroethane	<0.0003	G
1,1 Dichloroethane	<0.0003	G
1,1 Dichloroethene	<0.0003	G
1,2 Dichlorobenzene	<0.0003	G
1,2 Dichloroethane	<0.0003	G
1,2 Dichloropropane	<0.0003	G
1,3 Dichlorobenzene	<0.0003	G
1,4 Dichlorobenzene	<0.0003	G
2 Chloroethyl vinyl ether	<0.0003	G


Report is due the 15th of each month
Please highlight all permit violations
Attach laboratory data

Notes: _____


Analysis	Results	Sample type C (composite) G (grab) BC (Batch)
Acrolein	<0.0003	G
Acrylonitrile	<0.0003	G
Benzene	<0.0003	G
Bromodichloromethane	<0.0003	G
Bromoform	<0.0003	G
Bromomethane	<0.0003	G
Carbon tetrachloride	<0.0003	G
Chlorobenzene	<0.0003	G
Chloroethane	<0.0003	G
Chloroform	<0.0003	G
cis 1,3 Dichloropropene	<0.0003	G

All units are mg/L unless otherwise noted.
(units reported are to be the same as listed in the permit)

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."


Signature of Responsible Official or Duly Authorized Representative

*This form is available at www.dekalbcountyga.gov/watershed-management/IPP Revised 12/2016


 Pretreatment Section
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 4572 Memorial Drive
 Decatur, Georgia 30032
 Phone # (404) 687-7150
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Self Monitoring Monthly Analyses Reporting Form

Industry Name: ACME Incorporated, Tucker Date: 2/5/2018
 Address: 1234 ACME Street
Tucker, GA 30084 Permit No.: DK01234
 Discharge: _____
 Point: 1
 Reporting Month: February 2018

Analysis	Results	Sample type C (composite) G (grab) BC (Batch)
Dibromochloromethane	<0.00002	G
Ethylbenzene	<0.00002	G
m,p Xylene	<0.00002	G
Methylene chloride	<0.00002	G
o Xylene	<0.00002	G
Tetrachloroethene	<0.00002	G
Toluene	0.021	G
trans 1,2 Dichloroethene	<0.00002	G
trans 1,3 Dichloropropene	<0.00002	G
Trichloroethene	<0.00002	G
Trichlorofluoromethane	<0.00002	G


Report is due the 15th of each month
Please highlight all permit violations
Attach laboratory data

Notes: _____

Analysis	Results	Sample type C (composite) G (grab) BC (Batch)
Vinyl chloride	<0.00002	G

All units are mg/L unless otherwise noted.
(units reported are to be the same as listed in the permit)

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."


Signature of Responsible Official or Duly Authorized Representative

*This form is available at www.dekalbcountyga.gov/watershed-management/IPP Revised 12/2016



DeKalb County
G E O R G I A

SAMPLING & INSPECTION PROCESS

Nicole Gundy, Compliance Inspector



- **Required at least annually for every permit**
- Analyses/frequency dependent on:
 - Your process
 - DWM sewer system
 - DWM/COA/Gwinnett treatment plants
 - Your compliance history
- Type (grab or composite) dependent on:
 - Your process
 - 40 CFR 136
 - Instantaneous compliance determination
- Sample Point Identified in Permit
 - Representative of Normal Discharge

SAMPLING EQUIPMENT

It is a violation to tamper with DWM equipment

Below grade sampler installation



Programming sampler



Components of sampler





- Unannounced inspection
- Required to provide:
 - Timely access to premises
 - Industry should notify security not to impede access
 - Access to entire facility
 - Required documents (min 3 years)



Inspectors check:

- Overall process
- Housekeeping
- Containment areas
- Spill kits
- Records
- Sample devices
- Measurement devices





Check:

- Application versus process
- Current chemicals
- Corrective actions
- Maintenance
- Potential for slugs
- Illicit connections (e.g. stormwater)





- Pre-Treatment System(s)
 - Functionality of system
 - Maintenance
 - Use
 - Potential For bypass
 - Piped discharges
- If questions regarding connections
 - Dye tests
 - Sealed as-builts





INSPECTIONS – SLUG OR SPILL PREVENTION EVALUATION

- Clearly label containers
- Slug/Spill containment meets requirements
 - Spill kits at chemical storage, floor drains, roll up doors, & near storm drains
- Slug prevention plan up to date/posted
- General housekeeping
 - Enforceable if floor drains present



03-04-20



Industrial Pretreatment Program Stakeholder's Meeting



65



COMMON ISSUES

- Access to facility impeded
- No discharge meter
- Equipment not functional or calibrated
- Wrong sample point utilized
- Pre-treatment not in use/maintained
- Incorrect analysis performed
- No certified operator/laboratory analyst
- Incorrect test method used
- Time, not flow weighted composite samples
- pH not within holding time
- Insufficient sample volume
- Documentation not readily available
- Documentation not complete
- Documentation not legible



DeKalb County
G E O R G I A

ENFORCEMENT PROCESS

Larry Ryder, Compliance Inspector

FEDERAL-STATE-LOCAL

1st Step

- Any noncompliance with permit
- Written notice
- 15 days to respond
- Corrective action plan required
- Follow-up required





- Not frequent
- Show cause hearing
 - Industry must make a case for continued permit
- Requires
 - Immediate compliance
 - Remedial or preventive action



POTENTIAL ACTIONS FOR FAILURE TO COMPLY

- Cease Discharge Order (Cease and Desist)
- Citation – Requires Appearance in Magistrate Court
 - \$1,000 fine per violation, per day
- Revocation/termination of permit
- **Termination of water service if discharge continues**





Rodney Bettis

rbettis@dekalbcountyga.gov

O - (770) 808-2905

C - (404) 432-6019

Nicole Gundy

ngundy@dekalbcountyga.gov

O - (404) 294-2192

Bryan McMillan

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INDUSTRIAL PRETREATMENT COMPLIANCE INSPECTORS

Tayo Adekoya

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Larry Ryder

leryder@dekalbcountyga.gov

O - (770) 687-7118

C - (404) 797-3213

Brittney Varnedoe

bstrickland@dekalbcountyga.gov

O - (404) 687-7150

C - (678) 237-3736

General Information/Inquires

IPP@dekalbcountyga.gov

(404) 687-7150



DeKalb County
G E O R G I A

PROGRAM FUTURE

Underway & Needed



CURRENTLY UNDERWAY

Currently Underway

- Investigation of unpermitted facilities
- Cross-training with other inspectors
- Incorporating FOG Permit in Industrial Permit
- Integration with Planning and Sustainability (Permitting)

What is needed?

- Greater opportunities for cooperation with DeKalb Stakeholders
- Your Ideas???



QUESTIONS?

Unity is strength... when there is teamwork and collaboration, wonderful things can be achieved.”