

CITY OF TEMPLE PRETREATMENT PROGRAM

Standard Operating Procedures

These operating procedures are intended to outline the steps necessary to implement the City of Temple Industrial Pretreatment Program. All procedures have been developed to meet the objectives and regulations of the National Pretreatment Program as defined by the Environmental Protection Agency, through the TPDES permitting system. All Industrial permits are written and contain all requirements according to 40 CFR 403.8 (f)(1)(iii)(B)(1-6).

The City of Temple currently has two wastewater plants servicing domestic and commercial wastes: The Doshier Farm Wastewater Treatment Plant, and the Temple-Belton Wastewater Treatment Plant (TBWWTP) located in Belton. The City of Temple is responsible for compliance monitoring and on site inspections of the Temple industries discharging to the TBWWTP Pretreatment Program and hence will be referenced as such. The procedures described in this document meet all local, state, and federal requirements as they presently stand, and as these requirements change the procedures/implementation will also be changed.

I. Administration

Administrative responsibility for carrying out all aspects of the City Pretreatment Program rests with the Director of Public Works. The responsibilities include basic policy decisions, management of budgetary needs, personnel administration, reporting to State and Federal agencies and coordination with the public, industries and media. The Pretreatment Coordinator is responsible for day to day operations and carrying out the requirements of this operating procedure.

II. Organization

Attachment No. 1 defines the organizational structure for carrying out Pretreatment Program requirements.

III. Operations

1. Industrial User File. A file folder including documentation associated with any required BMPs for each industrial user shall be kept for a minimum of three years after permit expiration date, longer if under litigation. The files will be readily available for public review or review by the Texas Commission on Environmental Quality (TCEQ) or Environmental Protection Agency (EPA) inspectors. The files will contain a minimum of the following:

- a. Facility name and location;
- b. Name of facility contact, the authorized signatory authority (in accordance with 40 CFR 403.12 (l) and phone number;
- c. Types of products/services produced as well as raw materials used and SIC codes;
- d. Copy of latest industrial inspection performed;
- e. Copy of the most current permit issued to them by the City;
- f. Results of analysis performed by the industry;
- g. Results of analysis performed on the industry by the City;
- h. All correspondence with user concerning Pretreatment Program;
- i. Copies of notice of violations issued, AOs, and any compliance schedules; and
- j. The average and maximum discharge flow rate for the most recent self-monitoring period.

For all industries that discharge to the TBWWTP, copies of all compliance monitoring, inspections, industrial self-monitoring, and correspondence shall be sent to the Industrial Pretreatment Coordinator for the TBWWTP.

2. Administration. Day to day administration is the responsibility of the Pretreatment Coordinator. Daily administration includes, but is not limited to maintaining user files, performing nonresidential users survey every 3 years, performing required inspections, preparation of monthly reports, and maintaining correspondence both to and received from industrial users. It is the Pretreatment Coordinator's responsibility to investigate instances of noncompliance with the Pretreatment Standards and Requirements as indicated in the reports and notices required under 40 CFR 403.12, or indicated by analysis, inspection, and surveillance activities. Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions.

Bypass – Bypass is prohibited and the City will take enforcement action against an Industrial User for a bypass unless the industry meets one of the three conditions listed in 40 CFR 403.17 (d) (1). In such case, the industry will notify the City of anticipated bypass at least ten days in advance if possible.

3. Permits. Permits to discharge into the sanitary sewer are written by the City's Pretreatment Coordinator and will contain at a minimum all elements as stated in 40 CFR 403.8 (f)(1)(iii)(B)(1-6). Monitoring parameters are determined by evaluating user monitoring data, chemicals used and stored and other information concerning the permitted process. Limits are assessed by comparing all applicable standards including categorical and local limits. If applicable, Best Management Practices will be reviewed. The most stringent standard is applied.

The Permittee shall apply for wastewater discharge permit reissuance by submitting a complete wastewater discharge permit application in accordance with all rules, regulations, and approved City ordinance. A Permittee must reapply at a minimum of

sixty (60) days prior to the expiration of the user's existing industrial waste discharge permit, except as otherwise provided by the Director.

All wastewater industrial discharge permits are void upon the effective date of a newly issued wastewater discharge permit. Discharge permits may be revoked or denied for the following reasons:

- a. Failure to notify the Director of significant changes to the process wastewater prior to discharge into the sanitary sewer;
- b. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- c. Falsifying self-monitoring reports;
- d. Tampering with monitoring equipment;
- e. Refusing to allow the Director or duly authorized representative timely access to the facility premises and/or records;
- f. Failure to meet compliance schedules;
- g. Failure to provide advance notice of the transfer of business ownership of a permitted facility; or
- h. Violation of any pretreatment standard or requirement, and/or any terms of the wastewater discharge permit.

4. Compliance Monitoring. The City of Temple will sample/monitor all industries on the Pretreatment Program a minimum of once per year.

When sample results are completed, the laboratory will forward them to the Pretreatment Coordinator. The determination is made on each industry's status, and report forms become a part of the permanent record. All industries that demonstrate a noncompliant status will be sent a Notice of Violation with a copy of the laboratory results. A response date will be stipulated and the industry is requested to reply in writing as to the cause(s) of the violation and/or any corrective action that will be taken to prevent any future violations.

If an industry receives a Notice of Violation and fails to respond by the response date, a reminder is sent within five (5) working days. If no response is received within 30 days of the original response date, the industry is deemed to be in Significant Noncompliance and will be published in the newspaper during the month specified in the City's TPDES Permit.

The Pretreatment Coordinator or their designated personnel will be responsible for scheduling and/or shipping all samples for analysis for the pollutants associated with the industries. The City will maintain quality control records for a minimum of three years.

5. New Industry. The office of the Director of Public Works is responsible for identifying new industries and locating existing candidates for the Pretreatment Program. The following information channels will be utilized in identifying new industries and locating existing candidates for the Pretreatment Program:

- a. Review of building permits issued;
 - b. Review of new commercial water service accounts through the water billing office;
 - c. Conduct a nonresidential user survey of industries located within the City, and any other businesses that have the potential to adversely affect the POTW every three (3) years; and
 - d. Receive annual list of Industries from the Temple Chamber of Commerce and/or the Bureau of Economic Development.
6. Combined Wastestream Formula. The industrial discharge applications are evaluated to make the determination if a combined wastestream formula is warranted and procedures are followed according to 40 CFR 403.6(e).
 7. Net/Gross Calculation. Pretreatment Standards may be adjusted to reflect the presence of pollutants in the Industrial User's intake water in accordance with 40 CFR 403.15. Any Industrial User wishing to obtain credit for intake pollutants must make application to the Control Authority. After the application is received from the industry, the Control Authority will follow the procedures in 40 CFR 403.15.
 8. Best Management Practices (BMP) and Slug Discharge Control Plan Evaluations (SDCP). The City may develop best management practices by ordinance or in individual wastewater discharge permits to implement categorical standards only. The City will evaluate industries for the need of a SDCP or other actions as needed. The City will evaluate all BMPs and SDCPs, if needed, to ensure language is complete. The industry will be required to comply with language in BMPs and SDCPs.
 9. All industrial users are required to immediately notify the POTW of any changes in the IU's facility affecting the potential for a slug discharge. All industries are also required to immediately notify the City of discharges that could cause problems at the POTW, including slug loadings.

IV. SAMPLING

1. Industry Sampling. Industries will be required to self-monitor at least once every six (6) months. The City may at their discretion, opt to require self-monitoring more frequently based on industry performance. A self-monitoring packet will be sent to each industry on the Pretreatment Program. Included in the packet will be a compliance report including certification statement for signatures for the industry to fill out and return by the stipulated due date. There will be a five (5) day grace period after the stipulated due date before the report is considered late. If the report is not received by the end of the grace period, a Notice of Violation (NOV) will be issued and a reminder will be dispatched requesting the information. If submittal exceeds thirty (30) days from original due date, the industry will be deemed to be in significant non-compliance.

The self-monitoring report shall contain at a minimum the following:

- a. Analysis of regulated pollutants (at a minimum those listed in the industry's permit) and support documents at the appropriate sampling location; and, when applicable, BMP documentation and pollution prevention alternatives;
- b. Daily and average discharge flow rates (either measured or estimated) for the reporting period;
- c. Certification statement as outlined in 40 CFR 403.12 (b)(6); and
- d. Estimates of or measured production rate, if pretreatment standard is based on production.

When an industry returns a self-monitoring packet and one or more parameters indicate a violation, a Notice of Violation will be issued by the City. A response date is stipulated and the industry is requested to reply in writing as to the cause(s) of the violation and/or any corrective action that will be taken to prevent any future violations.

2. Laboratory. Industrial sampling will utilize automated samplers. Where automated samplers cannot be used, 4 part grabs will be substituted. In the case of using 4 part grabs, they will be collected in equal amounts over equal time intervals, indicative of normal operations. At the time of either set-up or collection of samplers, field data sheets (see example in Section VI, attachment #3) may be utilized to document sampling procedures. pH measurement will be taken on a grab sample at either the time of set up or the time of collection. The pH meter will be calibrated at sample site immediately prior to sample measurement.

The Pretreatment Coordinator or other designated personnel is responsible for setting up the schedule and subsequent shipping of industrial samples and quarterly samples that are required by the City's TPDES Permit.

3. Chain of Custody Procedures: The primary objective of the Chain of Custody Procedures is to create an accurate written record which can be used to trace the sample from its collection through analysis. The data may then be used as compliance criteria and/or as evidence should enforcement action be necessary. These procedures apply to routine Pretreatment Program sampling as well as pollution/discharge incidents as identified by the Pretreatment Coordinator and/or Director of Public Works.

Sample Possession: It is important that a minimum number of persons be involved in sample collection and handling. Field data record (standard form) will be completed at the time the sample is collected. The records will be signed by the collector(s). Records will contain:

- a. Sample start and end date and time;
- b. Source of sample;

1. Name of company;
2. Where sample is collected;
3. Grab or composite sample;
4. Type of preservation, if needed;
5. Name and signature of collector;
6. Sample volume;
7. Sample description; and
8. Container type;
- c. Other COC information;
 1. Relinquishment information/signature(s);
 2. Custody Seal information;
 3. Analysis Requested;
 4. Cooler Temperature;
 5. Lab ID numbers checked against QA/QC data;
 6. Legible document; and
 7. Review any additional comments;
- d. Other Analysis information;
 1. Analytical techniques/methods Used; and
 2. Who performed the analysis.

Completion Procedures: If chain of custody is in order, the City will continue with review of self monitoring packet. If chain of custody is missing any information, the City will highlight area of missing information and contact industry for correction within five (5) working days. If correction is not received within the specified time, a Notice of Violation will be issued to the industry. Each sample will be labeled to correspond with the field data sheet. If the sample is split, a chain of custody form is filled out in duplicate indicating the analysis required and collector's initials. Samples then are preserved according to 40 CFR Part 136, iced down, and taken to the City lab or placed in the lab refrigerator for shipping and subsequent delivery to the contract laboratory.

Laboratory Custody Procedures: City Lab – Incoming samples to the City lab must be logged in the lab log book. Should the sample not be immediately analyzed, the sample will remain in the lab which is a secured area until analyses are completed. Upon completion of analysis, the completion time and analysis results will be noted on the laboratory worksheet. Contract Lab – if any information is missing or incorrect on a chain of custody from the contract lab, contact the lab and request correction. All analyses will be according to 40 CFR Part 136 or other approved USEPA methods.

4. Demand Samplings: Immediately upon indication of plant upset, the Plant Manager and Director of Public Works will be notified. The Plant Manager will dispatch a quick response team to obtain search through the collection system for the source of the problem. Samples will be taken where there is probable cause.

V. Confidentiality

1. Public release of information concerning the Pretreatment Program or any file or sample information will be the responsibility of the Director of Public Works.
2. In accordance with 40 CFR 403.14, any information submitted to the City, TCEQ or EPA may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission by stamping “confidential business information” on each page containing such information.
3. Effluent data shall be made available to the public without restriction and cannot be claimed as confidential.

VI. Miscellaneous

1. The Pretreatment Coordinator will complete and submit the POTW annual report to the TCEQ in the month of May for Doshier Farm Wastewater Treatment Plant, and in the month of February for the Temple/Belton Wastewater Treatment Plant. After approval by the Director of Public Works, a notice will be published according to 40 CFR 403.8 (f)(2)(viii) and the City of Temple Code of Ordinances, Chapter 38, Article V, Industrial Waste Standards, Section 38-103. Publication will be made during the months of May and February respectively each year with a list of industrial users that meet the criteria for significant noncompliance. The month will be changed to correspond with any TPDES permit changes.
2. The Federal Register will be accessed online and/or purchased by the City.
3. All forms presented are examples only and are subject to revision with changing regulations and/or requirements.

[CITY SIGNATORY NAME]
[CITY SIGNATORY TITLE]

ORGANIZATIONAL CHART

Pretreatment Program

