



**City of St. Helens  
Local Program**

**November 2008**

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## Public Review Information

### **RELEASE OF RECORDS**

All records maintained by the City of St. Helens (City) regarding the Local Program available for public review where such records are not protected by law. Those wishing the information need only contact the City offices and make the request in writing. The request must be specific as to the type and nature of the records to be reviewed. Where the request requires considerable staff time or costs, the City may charge a reasonable fee. Such fee may be required. The only exception to release of records is information kept in a confidential file not available for public view due to the proprietary nature of the information.

### **CONFIDENTIAL INFORMATION**

Information and data on an industrial user obtained from reports, questionnaires, permit applications, permits, and monitoring programs, as well as from city inspection and sampling activities shall be available to the public without restriction. If the industrial user specifically requests and is able to demonstrate to the satisfaction of the City that the release of such information would divulge information, processes, or methods of production entitled to protection as trade secrets under applicable state laws, then that information will not be available to the public for review.

Wastewater constituents and characteristics and other "effluent data", as defined by 40 CFR 2.302 will not be recognized as confidential information and will be available to the public without restriction.

When requested and demonstrated by the industrial user furnishing a report that such information shall be held confidential, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, shall be made available immediately upon request to governmental agencies for uses related to this ordinance, the National Pollutant Discharge Elimination System (NPDES) program, and in enforcement proceedings involving the person furnishing the report.

If the information is deemed confidential, it will be separated from the remainder of the permit file and kept in a locked security cabinet. Access will be limited to the Plant operations/pretreatment supervisor, Wastewater Superintendent, and City Attorney. Access of the information to other parties will be upon approval of the City Attorney.

### **REPORTING BY THE CITY TO THE DEPARTMENT OF ENVIRONMENTAL QUALITY (DEQ)**

Since this is a Local Program, the City is not obligated to submit any reports to DEQ regarding its local program. All required reports will be submitted according to its mandated industrial pretreatment program as required in its NPDES Permit.

## **CHAPTER 1      OVERVIEW OF IMPLEMENTATION MANUAL**

The following is an overview of the City of St. Helens (City) implementation manual for its Local Industrial User Pretreatment Program (Local Program). The City has elected to manage its Significant Industrial Users (SIUs) through a separate mandated pretreatment program contained in another document. This document will provide the legal and functional basis for the City's Local Program, which is separate and independent of the Federal and State of Oregon requirements.

Since 1989, the city has undertaken a major effort to inspect and to regulate industrial discharges into the City's public sewer system. More recently, the City has been required by the State of Oregon to develop and implement a federally mandated industrial pretreatment program. In addition, the City also wants to insure that industries and non-domestic discharges of wastewater into the public sewer system are managed appropriately. It is with managing the Non-Significant Industrial Users (NSIUs) that the City has developed this Local Program.

This implementation manual is written for staff to assist them with managing as set of dischargers so they can be consistent in their management as well as being watchful of what goes into the public sewer system and ultimately the treatment plant and then the Columbia River. It is also developed to assist staff with details to address non-compliance discharges and to create a methodology to enforce the local, State and federal requirements for dischargers into a POTW.

All NSIUs may be controlled by the City through utilization of industrial user permits as necessary. Pretreatment staff will be timely in notifying affected users of pretreatment requirements, require timely submittal of reports from the IUs, insuring that thorough reviews of environmental survey forms and permit applications are accomplished, and issue permits in a timely manner.

### **1.1 City's Local Program Scope**

The City's local pretreatment program was developed to address discharges from non-domestic sources, which are not classified as significant. Discharges from industrial facilities classified as significant are addressed in the Implementation Manual for the Mandated Industrial Pretreatment Program. If during the course of processing paperwork, conducting inspections or through the course of enforcement actions, the City identifies a non-domestic discharger that meets the criteria of a significant industrial user or one that is identified in found in sections 307(b) and (c), and 402(b)(8) of the Act and any regulations implementing those sections", the City will place that user in its mandated industrial pretreatment program and treat it as an SIU.

An *Indirect Discharge* is defined in 40 CFR 403.3(i) as "the introduction of pollutants into a POTW from any non-domestic source regulated under section 307(b), (c) or (d) of the Act". The term *Industrial User* is defined in 40 CFR 403.3(j) as "a source of indirect discharge".

## **CHAPTER 2      EPA DESIGNATED PRETREATMENT PROGRAM REQUIREMENTS**

Even though there are no EPA program requirements for local programs, the City intends to follow the majority of the activities defined in the mandated pretreatment program by EPA. Instead of the local program requirements being met by EPA regulations, the City will utilize the Sewer Use Ordinance as its requirements for regulating NSIUs. Therefore the City will ensure that there are still the following elements in its local program.

- Legal Authority
- Procedures
- Enforcement Response Plans
- Identification and notification of Industrial Users (NSIUs)

## **CHAPTER 3      LEGAL AUTHORITY**

Even though the City is not required to have a local program, the City will utilize the same legal statutes it has in place for the mandated program to regulate non-significant discharges into the public sewer system. The City has adopted legal enforcement authority to ensure that the aspects of the mandated pretreatment program requirements, as defined in sections 307(b) and (c), and 402(b)(8) of the Act, can be undertaken. The City is using that same legal enforcement ability to enforce regulations for non-SIUs as needed.

### **3.1 Federal Requirement**

There is no federal requirement for a Local Pretreatment Program.

## **CHAPTER 4      PROCEDURES**

Even though this document is prepared to address non-domestic discharges that are not included in the City's mandated pretreatment program, the City has decided to follow most of the procedures developed for the City's mandated program. This action is taken to try and maintain consistency with both the mandated regulated community as well as those in the City's local program. At a minimum, these procedures will describe the tasks necessary to identify sources of discharge, regulate them and enforce appropriate regulations. The following sections of this document will provide the procedures necessary for staff to regulate discharges into the City's public sewer system:

- 4.1 Identify and locate all possible Industrial Users, which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request, and be included in the City's submittal of its Annual Report to DEQ.
- 4.2 Identify the character and volume of pollutants contributed to the POTW by the Industrial Users.
- 4.3 Notify Industrial Users of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act.
- 4.4 Receive and analyze self-monitoring reports and other notices submitted by Industrial Users in accordance with the self-monitoring requirements.
- 4.5 Randomly sample and analyze the effluent from industrial users and conduct surveillance activities in order to identify, independent of information supplied by industrial users, occasional and continuing noncompliance with pretreatment standards. Inspect and sample the effluent from each permitted Industrial User commensurate with the discharge into the POTW.
- 4.6 Investigate instances of noncompliance with Pretreatment Standards and Requirements, as indicated in the reports and notices required in their permit, or indicated by analysis, inspection, and surveillance activities. Sample taking, analysis, and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions.
- 4.7 The POTW will utilize the enforcement response plan developed for the mandated pretreatment program to maintain consistency in regulating industrial discharges to the public sewer system. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of industrial user noncompliance.
- 4.8 Control through letter, permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable requirements.

The procedures for conducting the above tasks are more completely defined in the following sections. Specific Forms and additional language to assist staff with specific detail will be in the appendices of this document.

## 4.1 Industrial Survey

### 4.1.1 Purpose

Identify and locate all possible Industrial Users, which might be subject to the City's Mandated or Local Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request, and be included in the City's submittal of its Annual Report to DEQ.

In addition, this procedure will also ensure that all non-domestic discharges to the public sewer system are identified and correctly classified. The City will utilize all avenues of its current policies relating to business license and development permits as well as observations obtained by staff and/or the public to identify potential SIUs, which might be subject to the City's mandated Pretreatment Program. In addition, nondomestic industrial users that discharge pollutants in violation of the City's Ordinance may be required to submit information to determine whether that source will become an SIU and therefore come under the direction of federal program requirements

### 4.1.2 Procedure

The City reviewed and updated the list in 2004, with no new SIUs identified. The City's latest result of an industrial survey identifies no new industrial users. The following is a list of significant industrial users currently permitted by the City:

Armstrong World Industries	Permit #101
Boise Cascade Timber Products	Permit #102
Boise Paper Solutions S.H. Paper Mill	Permit #110

. The most current list is submitted annually to DEQ in the City Pretreatment Report . This is an on-going survey. Regarding the survey process for Columbia City, the Multi-Jurisdictional Agreement (MJA) in Chapter 8 of the Mandated Implementation Manual identifies the process for identifying and regulating appropriate industrial users.

As an on-going procedure to maintain this list, the City will use a Non-Domestic Environmental Screening Survey Form, and Environmental Survey Form and an Application to maintain its identification of potential significant industrial users. To maintain this list the City will also use the following to ensure that the industrial list is current:

- a. All NSIUs issued either a Letter of Authorization or a Discharge Permit will be required to notify the City of changes in its operation or wastewater characteristics.
- b. New users (SIUs and Non-SIUs) will be added to the original user survey.
- c. The survey is on-going and updated on an on-going basis and any updates will be submitted to DEQ annually.
- d. Identification of new users that occupy new structures.
  - The Planning Secretary, who issues building permits to new facilities, will provide the facility name to the pretreatment staff. The pretreatment staff and affected user will be required to follow applicable procedures outlined in 4.1.2.
- e. Identification of new users that occupy existing structures.
  - The Utility Billing Specialist, who records all new water turn-ons, will submit a monthly report to the pretreatment staff of all non-residential new users.
  - The Building/Engineering Secretary will provide a monthly report of all new business licenses.

All industrial users (both SIUs and Non-SIUs) will be filtered using a Non-Domestic Environmental Screening Survey form (NDESSF). Examples of the NDESSF, ESF and permit application are in Chapter 7, Exhibits D and E.

Once a month the City's Business and Planning Departments develop the list of most recent Business License Applications and proposed construction for the year. These new business and construction applications for non-domestic users of the sanitary sewer system are submitted to the plant operations/plant supervisor. Once the plant operations/pretreatment supervisor receives this information, he completes a NDESS based on the information submitted by the user. They then make a determination whether additional information is required. If further review of the dischargers waste is of no further interest, the user will be logged accordingly. See attached drawing 4.1.2 below.



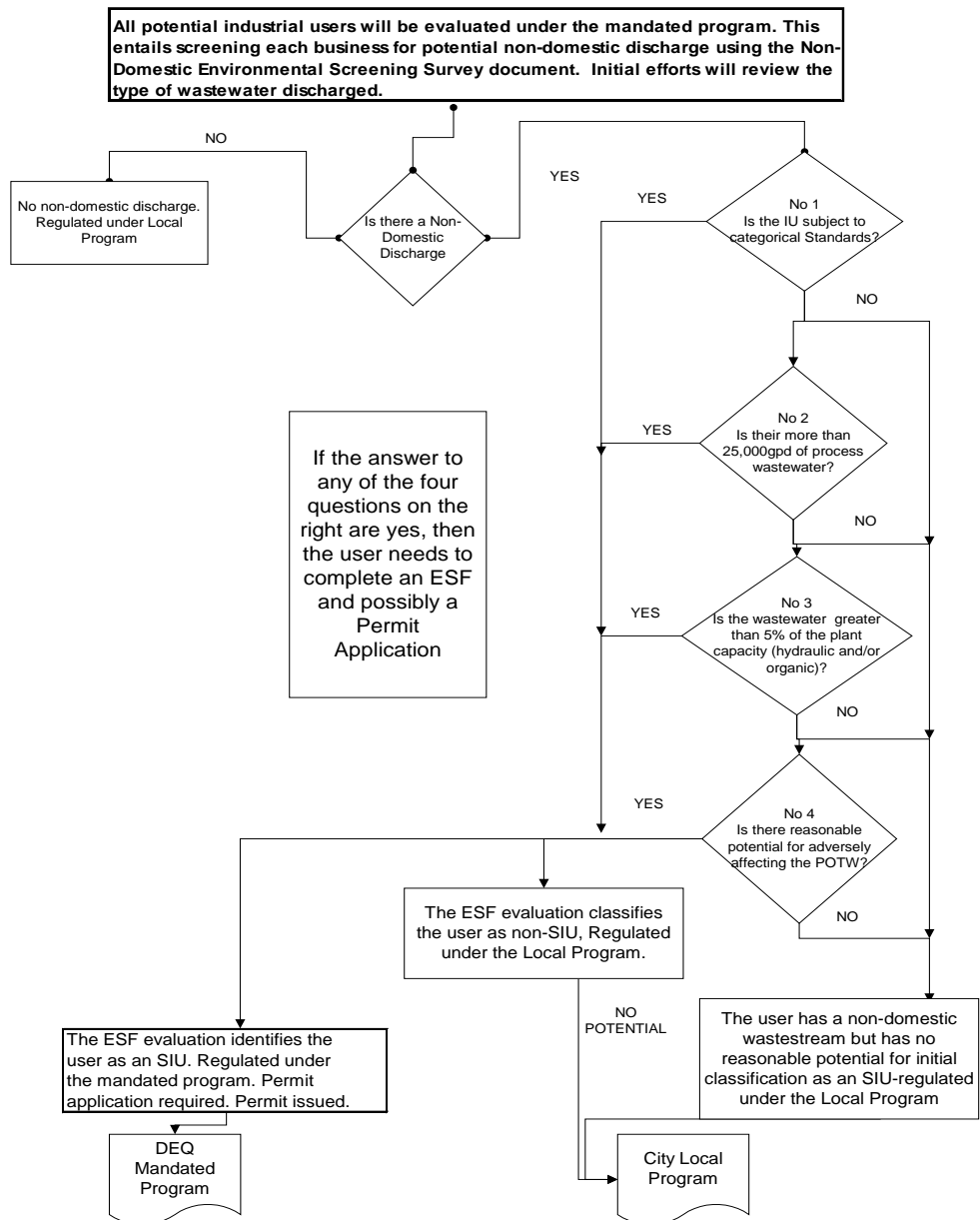
The City will use an Environmental Survey Form (ESF) to maintain its initial and on-going identification of significant industrial user up-dating process. To maintain this list the City will also use the ESF as well as the following to ensure that the industrial list is current:

- All NSIUs issued a permit will be required to notify the City of changes in its operation or wastewater characteristics.
- New users will be added to the original user survey.
- The updated industrial survey will be highlighted and made part of the annual report to DEQ.
- Identification of new users that occupy new structures:
- The Building Official, who issues building permits to new facilities, will provide the facility name to the pretreatment staff. The pretreatment staff and affected user will be required to follow applicable procedures outlined later on in this chapter.
- Identification of new users that occupy existing structures:
- The finance director, who records all new water turn-ons, will submit a monthly report to the pretreatment staff of all non-residential new users.
- The City administrator will provide a monthly report of all new business licenses.

The affected users will be required to submit all required data using the ESF. Examples of the ESF and permit application are in the appendix.

The affected user, if it has a nondomestic wastewater discharge, will be notified by the plant operations/pretreatment supervisor stating which regulatory standards apply (local, state, and/or federal). The affected user will sample its nondomestic wastewater discharge to determine if it complies with the applicable standards. The City can do the sampling if necessary, but there may be a charge for the service. If the industrial user is found to be in noncompliance, a time period stating a definite date to reach compliance will be established. A new source discharger will be required to submit estimates of pollutants to be discharged with estimated concentrations.

- 4.1.2.1 Upon receipt of the ESF and permit application, the plant operations/pretreatment supervisor will create a file for that business or industry. All data will be reviewed carefully. The plant operations/pretreatment supervisor will pay particular attention to which standards apply to the affected user, as well as, compliance dates.
- 4.1.2.2 Follow-up activities (phone calls and conferences) will be undertaken for incorrect, inaccurate, or missing data.
- 4.1.2.3 A detailed inspection will be performed at affected user's facility to determine its classification, verify data submitted in the ESF and permit application, observe the manufacturing operation, and determine if additional pretreatment requirements are warranted (such as ASPP).
- 4.1.2.4 After reviewing the environmental survey form parts A and B of the permit application and identifying the character and type of industry, the industry will be checked against the 40 CFR Chapter 1 Subchapter N Parts 405-471 to determine if EPA lists this industry with a categorical classification. Categorical industries that do not discharge to the POTW (dry categorical) will not be classified as SIU. Once all the data has been evaluated, the plant operations/pretreatment supervisor will make a final decision on classifying the user. If the user is identified to be a Significant Industrial User, it will then be asked to complete an Industrial Waste Permit Application, and be placed in the City's mandated pretreatment program.



Drawing 4.1.2

## 4.2 NON-SIGNIFICANT INDUSTRIAL USER APPLICATION

### 4.2.1 Purpose

To identify the character and volume of pollutants contributed to the POTW by the Industrial Users. This information shall be made available to the Regional Administrator or Director upon request. The City is using this process that is identified in its mandated program to ensure that the user is not characterized incorrectly. If the user is not an SIU, it will be included in the local program.

### 4.2.2 Procedure

- a. This section of the requirements is met through the use of an Industrial Waste Permit Application. The actual form and format are available for review in the appendices.

Permits and/or Letters of Authorization may be issued to NSIUs. The pretreatment staff will inform the user of their classification (NSIU) within 30 days of determination by the City. The user will be notified if a permit application must be completed, and that a Permit or Letter will be required.

The City may also determine that an Industrial User subject to categorical pretreatment standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N is a Non-Significant Categorical Industrial User rather than a Significant Industrial User on a finding that the Industrial User never discharges more than 100 gallons per day (gpd) of total categorical wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:

- (a) The Industrial User, prior to the City's finding, has consistently complied with all applicable categorical pretreatment standards and requirements;
- (b) The Industrial User annually submits the certification statement required in 40 CFR 403.12(q), signed and certified in accordance with Section 4.2.2.3 (b) of the Mandated Implementation Manual, together with any additional information necessary to support the certification statement; and
- (c) The Industrial User never discharges any untreated concentrated wastewater

#### 4.2.2.1. Application Review Process

- a. Check for Completeness and that all spaces are filled in. Instructions shall provide that all items must be completed and the term "not applicable – N/A" used to show that the item was considered but not pertinent to the facility.
- b. If the permit application is incomplete, use one of the following methods to obtain the needed information:
  - Use the telephone.
  - Meet in person and ask.
  - Return the application by mail (certified) to be completed.
- c. Inspect the facility to verify information provided.
- d. If there are extensive corrections, require a new application to be completed.
- e. Determine if sewer piping layout and process diagram for the facility exist.

#### 4.2.2.2. Measurement of Pollutants

- a). The completed Industrial Waste Discharge Permit Application (also meeting the requirements of the BMR) shall be based upon data obtained through appropriate sampling and analysis performed or if a new facility based on an engineers estimate, which data is representative of conditions. Unless otherwise specified in this section, sampling for all pollutants must be made by using 24-hour composite samples obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the City. Where time-proportional composite sampling or grab sampling is authorized by the City, the samples must be representative of the discharge and the decision to allow the alternative sampling must be documented in the Industrial User file for that facility or facilities.

Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. Using protocols (including appropriate preservation) specified in 40 CFR Part 136 and appropriate EPA guidance, multiple grab samples collected during a 24-hour period may be

composited prior to the analysis as follows: For cyanide, total phenols, and sulfides the samples may be composited in the laboratory or in the field; for volatile organics and oil & grease the samples may be composited in the laboratory. Composite samples for other parameters unaffected by the compositing procedures as documented in approved EPA methodologies may be authorized by the City, as appropriate. In addition grab samples may be required to show compliance with instantaneous limits.

b.) For sampling required in support of baseline monitoring and 90-day compliance reports a minimum of four (4) grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide and volatile organic compounds for facilities for which historical sampling data do not exist; for facilities for which historical sampling data are available, the City may authorize a lower minimum. The industrial user is required to collect the number of grab samples necessary to assess and assure compliance with applicable pretreatment standards and requirements.

c.) All analyses shall be performed in accordance with procedures established by the Administrator pursuant to section 304(h) of the Act and contained in 40 CFR part 136 and amendments thereto or with any other test procedures approved by the Administrator. (See, 40 CFR 36.4 and 136.5.) Sampling shall be performed in accordance with the techniques approved by the Administrator. Where 40 CFR part 136 does not include sampling or analytical techniques for the pollutants in question, or where the Administrator determines that the part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other sampling and analytical procedures, including procedures suggested by the POTW or other parties, approved by the Administrator.

d.) If an Industrial User subject to Periodic Reports on Continued Compliance and for Reporting Requirements for Industrial Users not Subject to Categorical Pretreatment Standards, monitors any regulated pollutant at the appropriate sampling location more frequently than required by the City, using the procedures prescribed in paragraph a.) of this section, the results of this monitoring shall be included in the report.

#### 4.2.2.3 Effluent Data

A new facility shall provide estimates based on best professional judgment. Existing facilities shall have the necessary background effluent data. If effluent data is insufficient or nonexistent, waste characterization by sampling and analysis of individual waste streams will be necessary.

a. If facility final effluent appears to be diluted, collect data on internal waste stream characteristics:

- Before the waste stream enters the facility treatment plant
- After it leaves the treatment plant at facility
- As the effluent enters POTW
- Internal waste stream flows
- Exhibits E and F give examples of style to be used when analyzing permit application
- Any other supplementary information needed to develop the permit

b. Authorized Signatory Official must be of sufficient stature to hold the facility legally responsible for the representations made on the permit application and subsequent compliance reports. Categorical industrial users documents must be signed by an authorized signatory official as defined below:

1. If the industrial user submitting the report is a corporation.

- i. The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
  - ii. The manager of one or more manufacturing, production, or operation facilities provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. If the user is a partnership or sole proprietorship: a general partner or proprietor, respectively.
  3. If the user is a Federal, State or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
  4. The individuals described in paragraphs 1 through 3, above, may designate another authorized representative if the authorization is in writing by the individual described in paragraph 1 through 3 above, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the City.

#### 4.2.2.4. Accuracy

The permit application must be accurate, all necessary information must be provided and all information must be accurate. When reviewing a permit for accuracy the same procedures to correct inaccurate information as were used to obtain missing information will be used.

- a. In verifying the industrial user's information, particular attention shall be given to:
  - Information on the use, production, and discharge of toxic substances;
  - Information on all waste streams (including schematic flow diagram(s) and waste characterization of individual waste streams).
- b. Accurate information on the use or production of toxic or non-conventional pollutants at a facility and adequate sampling data on these pollutants in the facility's effluent are essential for preparing appropriate permit limits. Industrial users shall provide a comprehensive list of toxic substances used, produced (as products, by-products, or intermediates), and stored, and identify those toxic substances known or suspected to be present in the waste stream. If the industrial user lists toxic substances but does not indicate their potential presence in the waste stream, an explanation for this absence from the waste stream shall be provided. Specific organic constituents of trade name products or compounds shall be obtained from manufacturers. Facility inspections shall be conducted to verify this information by inspecting all storage areas and reviewing material safety data sheets.
- c. Schematic diagrams of facility operations and internal wastewater streams shall also be verified by inspecting the facility. If the facility is subject to categorical pretreatment standards, particular attention shall be paid to classifying regulated, unregulated, and dilution waste streams. Proper classification of the various waste streams and accurate flow data on the individual waste streams are critical to the calculation of correct effluent limits.
- d. Facility inspections may include dye testing as a method of verifying piping diagrams or identifying where piping diagrams do not exist. Developing a water balance using the water and wastewater flow data provided by the industrial user, can determine whether all waste streams have been accounted for and whether flow data are accurate. If discrepancies exist, actual flow measurements shall be employed to gather more accurate data.

- e. Sampling points, sampling methods, and analytical techniques. This information is needed to define any needed changes and to evaluate the quality of both the control authority and industrial user sampling data.

#### 4.2.2.5. Verifying Permit Application Data

- a. Background information review - To assist in evaluating the completeness and accuracy of the permit application, the permit writer shall consider any additional background information on the facility, which may be relevant. Much of this information may already be available in the control authority industrial user files. Pertinent background information to consider includes:
  - b. Current permit and rationale for the current permit (if one was prepared) - The permit writer shall be aware of the parameters regulated, the basis for setting effluent limits, and any management practices required of the discharger. This information will alert the permit writer of pollutants previously thought to be of concern and the monitoring requirements deemed appropriate. In addition to reviewing the industrial user background information, the permit writer shall also consider whether changes in the treatment plant operation, its NPDES permit conditions and/or its sludge disposal practices and limitations could affect the industry permit conditions. If the conditions under which specific discharge were permitted have not changed since the last permit application, little reason exists for drastic changes to the conditions for that discharge, assuming the previous permit was developed properly. Exceptions to this include cases where a record of problems or noncompliance exists at the facility, as discussed below.
  - c. Old permit application, baseline-monitoring report, and industrial waste surveys - Information in these documents can be used:
    - To establish past operating practices and conditions;
    - As a baseline for evaluating the new application; and
    - To identify changes.
  - d. Compliance inspection reports, sampling data, and self-monitoring reports - These reports may provide the permit writer with information regarding possible causes for any permit violations, indicate how well wastewater treatment units are operated, and provide insight as to the discharger's attitude toward environmental compliance. Information gathered from these reports such as evidence of spills or poor operation and maintenance of a pretreatment system will also provide a basis for the requirement of industrial user management practices as a permit condition. If these reports reveal any changes in the facility operations (compared to the previous permit application), these differences shall be noted and verified on the latest application. Any discrepancies shall be resolved to the permit writer's satisfaction before a permit is issued.
  - e. Review and evaluation of sampling data are important because this data can indicate how consistently the permit limits have been met (this information will be relevant in establishing monitoring frequencies required in the new permit). Changes in monitoring data or compliance can also indicate possible changes at the facility.
  - f. Correspondence concerning compliance or enforcement actions - This information can alert the permit writer to the occurrence and/or resolution of compliance problems and can be used to assist the permit writer in determining monitoring frequencies and/or special conditions.

#### 4.2.2.6. Facility Inspection

To conduct an adequate inspection of a facility may require a full day. Complex plants with several treatment systems, numerous sewer connections, and extensive ancillary activities may require more than one day to inspect.

- a. As mentioned earlier, a facility inspection is necessary to verify application information and to gain an understanding of the industrial user facilities. The inspection shall encompass a review of the following:
  - Production processes - this will assist the permit writer in identifying;
  - Applicable categorical pretreatment standards;
  - Toxic or hazardous substances that may be present in raw materials, products, and by-products that have the potential to be present in the industry discharge;
  - Water uses and resulting wastewater streams;
  - Existing in-process pollution controls;
  - Potential for spills and leaks.

From this information, the permit writer can select pollutants to be limited and/or require development of additional in-process controls. The Plant operations/prettreatment supervisor may choose to move an IU into the Mandated Pretreatment Program at any time during this review phase. If that decision is made, then the procedure outlined in the mandated pretreatment program procedures will be followed.

- b. Sewer layout of the plant - If a sewer plan exists, the permit writer needs to review the plan thoroughly to determine the course and destination of each sewer line. The exact source of and the point at which each waste stream enters the sewer need to be identified. The existing monitoring point or any potential location for monitoring shall also be located. Where sewer plans to not exist, smoke or dye testing shall be performed in order to locate all points of discharge to the sewer system. This information will be used to determine the appropriate sampling points, to ensure that all points of discharge to the sewer system will be identified in the permit, and to evaluate the need for application for the combined waste stream formula.
- c. Wastewater treatment facilities, including treatment performance and operation and maintenance practices - This information can be used to evaluate the adequacy of existing treatment, to assess the feasibility of improvements, and to evaluate performance data.
- d. Type of batch discharges that occur at the facility - This information could affect the design of the monitoring requirements. Clean-up operations usually result in batch discharge of washdown water. Information about clean-up times and water volumes will be sought.
- e. Raw material and product storage and loading areas, sludge storage and disposal areas, hazardous waste management facilities (if applicable) including onsite disposal areas, and all process areas and the proximity of these areas to sewer discharge points - This review will help to identify potential pollutants and potential or known problems with spills or leaks. This information is then used to determine the need for additional controls through the establishment of specific industrial user management practices (e.g., slug loading control plans, toxic organic management plans, and good housekeeping practices.)
- f. Sampling points, sampling methods, and analytical techniques - This information is needed to define any needed changes and to evaluate the quality of both the control authority and industrial user sampling data. For a NSIU, this process should not be necessary.

4.2.2.7 Public Access To Information

4.2.2.7.1 refer to General Introduction section on page ii

#### 4.2.2.8. Baseline Monitoring Report

The completed and approved environmental survey form Parts A and B and the permit application will serve as the baseline monitoring report (BMR) for categorical industries. as required in the mandated program.

## **4.3 Non-Significant Industrial User Notification**

### **4.3.1 Purpose**

This Chapter will identify the requirements and needs of meeting federal requirements of notifying industrial users of pretreatment and other standards as required. Even though the City is not required to notify non-SIUs about some of these requirements, they are responsible to notify IUs of the RCRA requirements. Therefore, the City will:

- Notify Industrial Users as required of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act.
- Within 30 days of approval of a list of significant industrial users, notify each significant industrial user of its status as such and of all requirements applicable to it as a result of such status.

### **4.3.2 Procedure**

All IUs will receive a package, which will consist of information explaining the classification of the user. If necessary, the packet will also contain applicable pretreatment standards, applicable requirements under section 204(b) and 405 of the CWA and subtitles C and D of the Resource Conservation and Recovery Act, and a NSIU permit discharge letter, which will provide details on discharge limitations, requirements, and conditions. Typically for NSIUs, the only item they will receive is a letter identifying them as an NSIU and a copy of the Sewer Use Ordinance.

## **4.4 Receive and Analyze Reports**

### **4.4.1 Purpose**

To ensure that reports are reviewed on a consistent and uniform basis. Even though there may not be any report submittal requirements for NSIUs.

### **4.4.2 Procedure**

This section of the requirements is met through the use of reviewing reports required by any discharge permit or discharge authorization letter. If there are reports to be reviewed, the Plant Operations/Pretreatment Supervisor will utilize the procedure identified in the mandated program.

## **4.5 Sample, Analyze and Inspect Industrial Users**

### **4.5.1 Purpose**

Typically, Non-SIUs will not need to be sampled or have their effluent analyzed. There may be times that a Non-SIU may need to be inspected. Non-SIUs may be inspected on a routine that is not more than once in a five (5) year period. Typically this would be done prior to issuing a Letter or Permit, and sometime during the middle of the Letter/Permit time frame. If a Non-SIU is to be inspected or sampled, the procedures identified in the mandated program will be followed and the procedures for analyses will be utilized. Please review the documents in the mandated program and Exhibits G and H.

## **4.6 Investigate Industrial User Noncompliance**

### **4.6.1 Purpose**

To investigate instances of noncompliance with Standards and Requirements.

### **4.6.2 Procedure**

As outlined below, the plant operations/pretreatment supervisor will be responsible for insuring that users comply with requirements contained in the respective Letters of Authorization or Permits. The City will utilize the Enforcement Response Plan (ERP) that is used for the Mandated pretreatment program for purposes of consistency. Sampling data, compliance schedules and reporting requirements will be routinely evaluated. Either a manual system or computer system will be utilized to track compliance with limits and reporting requirements. This system will enable the plant operations/pretreatment supervisor to prepare routine summaries on compliance and any action taken by the City when noncompliance exists.



- a. As an example an enforcement action can be initiated for the following:
  - Industry failure to submit a ESF;
  - Industry failure to submit appropriate reports;
  - Industry failure to comply with appropriate pretreatment standards by the appropriate compliance deadline date;
  - Industry failure to comply with appropriate pretreatment limits as determined from the review of self-monitoring reports or city sampling;
  - Industry failure to comply with any condition of its permit;
  - Industry falsifying of information; and
  - Any other violation of the City's Sewer Use Ordinance (SUO).
- b. Enforcement activities will be of the escalating nature and will be commensurate with the type and severity of the violation (i.e., telephone call, notices of violation, meetings, revocation of the permit, show cause hearing, and issuance of order to include injunctive and judicial relief). Appropriate fines and penalties (administrative/civil/and criminal) will be levied as stipulated in the SUO. Depending on the severity of the violation or offense, the City will seek immediate penalties, orders, or injunctive relief.
- c. The following is a general outline of the City's enforcement strategy, which is discussed in detail in the City's Enforcement Response Plan in a separate document and is also included in Chapter 7.
  - The plant operations/pretreatment supervisor determines noncompliance.
  - The plant operations/pretreatment supervisor will notify the affected user.
  - The affected user may be required to respond in writing within a time frame set by the pretreatment plant operations/pretreatment supervisor, which takes into consideration the type of noncompliance, regarding the nature of the violation(s) and corrective actions being undertaken.
  - The plant operations/pretreatment supervisor will review the response (and may meet with the user) to determine the next step. The following scenarios may apply:
  - If the industry corrects the violation or the City determines that the response does not warrant escalating enforcement. No further action warranted.
  - The affected user fails to submit a response, fails to comply, or violation not corrected. The City initiates show-cause hearing. The affected user may appeal any order issued.
  - The affected user fails to comply with the issued order. The City will pursue judicial and injunctive relief.

Further details can be found in Chapter 7 (such as defining what is a violation, significant noncompliance definition, and an enforcement response guide along with time frame for undertaking action and for the non-complying user to take action).

## **4.7 Significant Noncompliance Publication**

### **4.7.1 Purpose**

To meet the federal requirement, this states that, the Control Authority must:  
Comply with the public participation requirements of 40 CFR part 25 in the enforcement of national pretreatment standards. These procedures shall include provision for at least annual public notification, in the largest daily newspaper published in the municipality in which the POTW is located, of industrial users which, at anytime during the previous 12 months, were in significant noncompliance with applicable pretreatment requirements. 40 CFR 403.8(f)(2)(vii)

### **4.7.2 Procedure**

The City will annually publish, in the largest daily newspaper circulated in the area where the municipal wastewater system is located, a list of all Industrial Users that were in significant noncompliance over the past 12 months. A definition of significant noncompliance can be found in the sewer ordinance

## **4.8 Enforcement Response Plan Implementation**

### **4.8.1 Purpose**

The City may choose to use the mandated pretreatment program ERP or it may choose to utilize the Ordinance in its enforcement of the rules and regulations.

## **4.9 Issuance of Permits or Discharge Authorization Letters**

### **4.9.1 Purpose**

To meet the federal requirement, this states that, the Control Authority must:

Control through permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Standards and Requirements. In the case of Industrial Users identified as significant under 40 CFR 403.3(v) this control shall be achieved through permits or equivalent individual control mechanisms issued to each such user. Such control mechanisms must be enforceable and contain, at a minimum, the items identified in the following Section.

### **4.9.2 Procedure**

The Permit Application process identified in Section 4.3 will be followed and it will allow for the permits to be issued with the appropriate limitations and conditions. Permits is a very important tool for the City to control, deny or restrict what can be disposed of into the public sewer system and ultimately into the waters of the state. The significant industrial user will be required to install sampling and monitoring facilities and must sample its wastewater in accordance with the permit.

4.9.2.1 A new IU will be issued a permit, which will contain appropriate reporting requirements, e.g., construction progress reports, final compliance report upon commencement of discharge and self-monitoring reports once discharge commences. The permit will also indicate the new source discharge must comply with the appropriate limits prior to commencing discharge. Self-monitoring reports will be submitted to the City at least semi-annually. Larger, more complex batch discharger will be required to submit more frequent reports. If the affected user fails to submit the necessary reports, the plant operations/prettreatment supervisor will initiate appropriate follow-up activities including enforcement activities.

- a. Fact sheets will be prepared by the City as part of its issuance of a permit to an SIU to explain the facility and document the basis of the pretreatment requirements.
- b. A permit will be issued to NSIUs within 60 days of the City's determination that the ESF and permit application is complete and an inspection of the facility has been performed. An example of the permit is in the appendix.
- c. Wastewater permits shall include such conditions as are reasonably deemed necessary by the City to prevent pass through or interference and to implement the objectives of the City's sewer use ordinance. Wastewater Permits must contain the following conditions:
  - A statement that indicates wastewater discharge permit duration, which in no event shall exceed five (5) years;
  - A statement that the wastewater discharge permit is nontransferable without prior notification and approval from the City in accordance with the City Municipal Code and provisions for furnishing the new owner or operator with a copy of the existing wastewater discharge permit;
  - Effluent limits including Best Management Practices are based on applicable federal pretreatment standards, or local limits, whichever is most restrictive;
  - Self monitoring, sampling, reporting, notification, and record-keeping requirements. These requirements shall include an identification of pollutants to be monitored, sampling location, sampling frequency, and sample type based on Federal, State, and local law; and
  - A statement of applicable civil and criminal penalties for violation of pretreatment standards and requirements, and any applicable compliance schedule. Such schedule may not extend the time for compliance beyond that required by applicable Federal, State, or local law.
  - Requirements for the development and implementation of spill control plans or other special conditions including management practices necessary to adequately prevent accidental, unanticipated, or non-routine discharges, if deemed to be necessary by the City.
- d. Permits may contain, but need not be limited to, the following:

- Limits on the average and/or maximum rate of discharge, time of discharge, and/or requirements for flow regulation and equalization.
- Limits on the instantaneous, daily and monthly average and/or maximum concentration, mass, or other measure of identified wastewater pollutants or properties.
- Requirements for the installation of pretreatment technology or construction of appropriate containment devices, etc., designed to reduce, eliminate, or prevent the introduction of pollutants into the treatment works.
- Requirements for development and implementation of spill control plans or other special conditions including management practices necessary to adequately prevent accidental, unanticipated, or routine discharges.
- Requirements for development and implementation of waste minimization plan to reduce the amount of pollutants discharged to the municipal wastewater system.
- The unit charge or schedule of user charges and fees for the management of the wastewater discharged to the system.
- Requirements for installation and maintenance of inspection and sampling facilities and equipment.
- Specifications for monitoring programs, which will include sampling locations, frequency of sampling, number, types, and standards for tests, and reporting schedules.
- Compliance schedules for meeting pretreatment standards and requirements.
- Requirements for submission of periodic self-monitoring or special notification reports.
- Requirements for maintaining and retaining plant records relating to wastewater discharge as specified in SUO Section 6.12 and affording the City, or its representatives, access thereto.
- Requirements for prior notification and approval by the City of any new introduction of wastewater pollutants or of any change in the volume or character of the wastewater prior to introduction in the system.
- Requirements for the prior notification and approval by the City of any change in the manufacturing and/or pretreatment process used by the permittee.
- Requirements for immediate notification of excessive, accidental, or slug discharges, or any discharge, which could cause any problems to the system.
- A statement that compliance with permit does not relieve the permittee of responsibility for compliance with all applicable federal and state pretreatment standards, including those which become effective during the term of the permit.
- Other conditions as deemed appropriate by the City to ensure compliance with the sewer use ordinance, and state and federal laws, rules, and regulations.

e. Effluent Limitations:

The determination of pollutants and/or hydraulic loading to be regulated will be based on information provided in the environmental survey form and permit application. Identify the most restrictive regulation (federal, state, local) that will apply to the pollutant in question. The effluent limitations will include:

- The description of the location where the limit applies;
- The period of time the limits apply;
- The specific parameters, the limit units (mg/l or ppm), and the duration for which the limits apply.
- Determination of monitoring requirements:
- List all discharge parameters specifying applicable units.
- Designate the specific sampling location.
- Determine the sampling frequency based on the best professional judgment of the significance of the discharge. A minimum of two times a year is required by 40 CFR 403.12(e) for categorical users and once every six months for users not subject to categorical pretreatment standards. Sample options:
  - Continuous monitoring
  - Grab
  - Composite sample
  - Flow or time proportional

f. Sample Collection Preservation and Analysis

All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR part 136 and amendments thereto unless specified otherwise in the monitoring conditions of the permit. Caution: Alternative methods of sampling and laboratory analysis of samples must be approved by EPA.

- g. Reporting requirements to be included in the Permit depends on the permit restrictions. The permit will identify specific information relative to the permit requirements.
- What type of information is to be contained; i.e., analytical data, flow data, or production data.
  - When the report is to be submitted to the plant operations/pretreatment supervisor (specify dates and frequency).
  - Who is responsible for signing (an authorized corporate official)?
  - Where the reports are to be sent including the control authority's address and the name of each person responsible for receipt of each report.

- h. Determination of Special Conditions:  
All significant industrial users will be evaluated to determine if they need to submit an accidental spill prevention plan (ASPP/SCP) as a requirement of the discharge permit. NOTE: Some facilities will not be issued a permit, but because of the nature of their operation or discharge, an ASPP/SCP may be warranted.

Permits may contain special monitoring requirements as deemed necessary to reduce the quantity of pollutants currently discharged or to prevent discharge of new or additional pollutants. Such requirements may be based on the permit writer's best professional judgment.

- i. Special monitoring reports - The plant operations/pretreatment supervisor will specify in the discharge permit specific reporting requirements. The following reports will be indicated in the permit as appropriate:
- For non-complying facilities, periodic compliance schedule progress reports;
  - Within ninety (90) days following the date for final compliance with applicable categorical pretreatment standards, or in the case of a new source, following commencement of the introduction of wastewater into the municipal wastewater system, any industrial user subject to such pretreatment standards and requirements shall submit to the City a report containing the information described in the City Municipal Code. For industrial users subject to equivalent mass or concentration limits established in accordance with the procedures in 40 CFR 403.6(c), this report shall contain a reasonable measure of the user's long term production rate. For all other industrial users subject to categorical pretreatment standards expressed in terms of allowable pollutant discharge per unit of production (or other measure of operation), this report shall include the user's actual production during the appropriate sampling period. All compliance reports must be signed and certified.
  - Periodic report on self-monitoring (if appropriate);
  - Noncompliance reporting;
  - Accidental spills must be reported to the City immediately, followed by a written report within five days;
  - Report specifying significant changes to manufacturing operation and/or discharges; and
  - Noncompliance with permits limits based on the facilities self-monitoring.
  - Any special monitoring and reporting requirements for specific categorical classifications.

#### 4.9.2.2 Modification of a Permit

The City may modify the permit for good cause including, but not limited to, the following:

- To incorporate any new or revised federal, state, or local pretreatment standards or requirements.
- To address significant alterations or additions to the industrial user's operation, processes, or wastewater volume or character since the time of permit issuance.
- A change in the municipal wastewater system that requires either a temporary or permanent reduction or elimination of the authorized discharge.
- Information indicating that the permitted discharge poses a threat to the City's municipal wastewater system, city personnel, or the receiving waters.
- Violation of any terms or conditions of the wastewater permit.

- Misrepresentation or failure to disclose fully all-relevant facts in the permit application or in any required reporting.
- Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13.
- To correct typographical or other errors in the permit.
- To reflect a transfer of the facility ownership and/or operation to a new owner/operator.

## CHAPTER 5 SEPTAGE HAULER PROGRAM

### 5.1 Purpose

To ensure that every facility that disposes of wastes into the public sewer system goes through a process to determine if the waste being discharged has any possibility of damaging or creating an opportunity for the wastewater treatment facility to be harmed.

### 5.2 Procedure

All haulers that wish to discharge wastes into the City's system must be properly licensed by the Oregon Department of Environmental Quality and registered with the City through the Plant operations/prettreatment supervisor as well as receiving a "Letter of Authorization" from the City (example in the Exhibits).

The haulers must also complete appropriate forms and paperwork as required. An example of the paperwork is found in Exhibits. If the paperwork is not completed as required, future disposals at the facility may be suspended.

Septage Haulers must abide by the following requirements, limitations and conditions:

1. Only domestic sanitary waste will be accepted without prior City approval.
2. All loads brought to the City of St. Helen's wastewater facility must submit, prior to discharge, a completed Septage Waste Ticket.
3. All septic waste shall be disposed of at the designated facility provided by the City of St. Helen's wastewater treatment plant.
4. Septage waste collected outside of Columbia County, Oregon, maybe accepted on a case-by-case basis with the final approval of the City Engineer. A \$0.01/gallon surcharge will be applied once the application has been authorized.
5. Dumping of septage waste must be completed during weekday hours of 6:00 am to 4:30 pm, *unless otherwise approved by the Wastewater Treatment Plant Superintendent.*  
*If any emergency requires an off-hour discharge, a message noting the volume and type of discharge, the driver's name, and the time and date of the discharge must be left on the wastewater treatment plan phone message recorder **prior to the discharge**. For off-hour discharges leave a septic ticket in the outside box next to the discharge manhole.*
6. All holding tanks must be Columbia County approved in order to meet the holding tank rate.
7. Trucks must meet all DEQ rules.
8. All septage waste must be declared on the Septage Waste Ticket form provided. Loads shall not contain prohibited discharges. Loads determined to contain prohibited materials may result in permit revocation.

### 5.3 Prohibited Discharges

1. Any pollutant which creates a fire or explosion or hazard at the publicly owned treatment works (POTW).
2. Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0 or higher than 9.0.
3. Any solid, or viscous pollutants in amounts, which will cause obstruction or interference to the flow in the POTW.
4. Industrial or commercial wastewater or sludge unless specifically approved.
5. Any type of pollutant, that is not treatable by this facility or creates a pass through or interference to the Wastewater Treatment Plant. This interference can impact plant effluent, sludge or causes operational problems; such as but not limited to toxic, hazardous or radioactive waste, grease and sand, rags or metal.
6. Other waste as outlined in the City's Ordinance or Resolutions.

\*Note: Interference means a discharge, which alone, in conjunction with a discharge or discharges from other sources inhibits, or disrupts the POTW, its processes or operations. This sludge processing and inevitably sludge disposal.

## CHAPTER 6

## DEFINITIONS

- A. Accidental Spill Prevention/Slug Control Plan (ASPP) "Any discharge at a flow rate or concentration, which could cause a violation of the prohibited discharge standards in the SUO. A Slug Discharge is any Discharge on a non routine, episodic nature, including but not limited to an accidental spill or a non customary batch Discharge, which has a reasonable potential to cause interference of Pass Through, or in any other way violates the POTW's regulations Local Limits or Permit Conditions.
- B. "Act" or "the Act" means the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. 1251 et seq.
- C. "Approval Authority" means the State of Oregon Department of Environmental Quality (DEQ).
- D. "Authorized Representative of the User" means:
- (1) If the user is a corporation:
    - (a) The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
    - (b) The manager of one or more manufacturing, production, or operation facilities provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
  - (2) If the user is a partnership or sole proprietorship: a general partner or proprietor, respectively.
  - (3) If the user is a Federal, State or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
  - (4) The individuals described in paragraphs 1 through 3, above, may designate another authorized representative if the authorization is in writing by the individual described in paragraph 1 through 3 above, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the City.
- E. "Best Management Practices (BMPs)" means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in the SUO. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.
- F. "Biochemical Oxygen Demand (BOD)" means the quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures for five (5) days at 20° centigrade usually expressed as a concentration (e.g., mg/l).
- G. "Categorical Pretreatment Standard" or "Categorical Standard" means any regulation containing pollutant discharge limits promulgated by EPA in accordance with Sections 307(b) and (c) of the Act (33 U.S.C. 1317) which apply to a specific category of users and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.
- H. Categorical Industrial User. An Industrial User subject to a categorical Pretreatment Standard or Categorical Standard.
- I. Chemical Oxygen Demand or COD. A measure of the oxygen required to oxidize all compounds, both organic and inorganic, in water.
- J. "City" means the City of St. Helens Oregon, a municipal corporation of the State of Oregon, acting through its City Council or any board, committee, body, official, or person to whom the Council shall have lawfully delegated the power to act for or on behalf of the City.

- K. “Composite sample” means the sample resulting from the combination of individual wastewater samples taken at selected intervals based on an increment of either flow or time.
- L. “Control Authority” means the City of St. Helens, Oregon.
- M. Daily Maximum. The arithmetic average of all effluent samples for a pollutant collected during a calendar day.
- N. Daily Maximum Limit. The maximum allowable discharge limit of a pollutant during a calendar day. Where Daily Maximum Limits are expressed in units of mass, the daily discharge is the total mass discharge over the course of the day. Where Daily Maximum Limits are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- O. “Environmental Protection Agency (EPA)” means the U.S. Environmental Protection Agency or, where appropriate, the Regional Water Management Division Director, or other duly authorized official of said agency.
- P. “Existing Source any source of discharge that is not a “New Source.”
- Q. “FOG” means fats, oils and grease.
- R. “FOG, nonpolar” means fats, oils and grease that are petroleum based.
- S. “FOG, polar” means fats, oils and grease generated from animal and vegetable origins.
- T. “Grab Sample” means a sample that is taken from a wastestream without regard to the flow in the wastestream and over a period of time not to exceed fifteen (15) minutes.
- U. “Hauled waste” means any waste trucked or hauled, including septic tank waste and non-septic waste with hazardous characteristics.
- V. “Indirect Discharge” or “Discharge” means the introduction of pollutants into the POTW from any nondomestic source regulated under Section 307(b), (c), or (d) of the Act.
- W. “Instantaneous Maximum Allowable Discharge Limit” means the maximum concentration of a pollutant allowed to be discharged at any time, determined from the analysis of any discrete or composite sample collected, independent of the industrial flow rate and the duration of the sampling event.
- X. “Interceptor” means a device designed and installed so as to adjust, separate and retain deleterious, hazardous or undesirable matter from wastewater and to permit normal sewage or liquid wastes to discharge from the user’s premises into the POTW.
- Y. “Interference” means discharge, which alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the POTW, its treatment processes or operations or its sludge processes, use or disposal; and therefore, is a cause of a violation of the City’s NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with any of the following statutory provisions and regulations or permits issued thereunder, or any more stringent State or local regulations: Section 405 of the Act; the Solid Waste Disposal Act, including Title II commonly referred to as the Resource Conservation and Recovery Act (RCRA); any State regulations contained in any State sludge management plan prepared pursuant to Subtitle D of the Solid Waste Disposal Act; the Clean Air Act; the Toxic Substances Control Act; and the Marine Protection, Research, and Sanctuaries Act.
- Z. Local Limit. Effluent limitation developed for Industrial Users by the Superintendent to specifically ensure renewed and continued compliance with the City of St. Helens NPDES permit or sludge use of disposal practice.
- AA. “Manual” or “The Manual” refers to the City’s Industrial Pretreatment Operation and Program Implementation Manual, and any amendments thereto.
- BB. “Medical Waste” means isolation wastes, infectious agents, human blood and blood products, pathological wastes, sharps, body parts, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes, and dialysis wastes.
- CC. Monthly Average. The arithmetic mean of the effluent samples collected during a calendar month.
- DD. Monthly Average Limit. The limit that applies to the Monthly Average of all effluents



- EE. “National Pretreatment Standard” means any regulation containing pollutant discharge limits promulgated by the EPA in accordance with Section 307(b) and (c) of the Act, which applies to Industrial Users. This term includes prohibitive discharge limits established pursuant to 40 CFR 403.5.
- FF. “New Source” means:
- (1) Any building, structure, facility, or installation from which there is (or may be) a discharge of pollutants, the construction of which commenced after the publication of proposed pretreatment standards under Section 307(C) of the Act which will be applicable to such source if such standards are thereafter promulgated in accordance with that section, provided that:
    - (a) The building, structure, facility, or installation is constructed at a site at which no other source is located; or
    - (b) The building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or
    - (c) The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the existing source, should be considered.
  - (2) Construction on a site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility, or installation meeting the criteria of Section (1)(b) or (c) above but otherwise alters, replaces, or adds to existing process or production equipment.
  - (3) Construction of a new source as defined under this paragraph has commenced if the owner or operator has:
    - (a) Begun, or caused to begin, as part of a continuous onsite construction program
      - (i) any placement, assembly, or installation of facilities or equipment; or
      - (ii) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or
    - (b) Entered into a binding contractual obligation for the purchase of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.
- GG. “Non-contact Cooling Water” means water used for cooling which does not come into direct contact with any raw material, intermediate product, waste product, or finished product.
- HH. “Non-Discharging Categorical Industrial User (NDCIU)” means non-discharging industries that have industrial processes that would otherwise be subject to categorical pretreatment standards, including NDCIUs with zero discharge categorical standards
- II. “Pass Through” means a discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the City’s NPDES permit, including an increase in the magnitude or duration of a violation.
- JJ. “Person” means any individual, partnership, co-partnership, firm, company, corporation, association, joint stock company, trust, estate, governmental entity, or any other legal entity; or their legal representatives, agents, or assigns. This definition includes all Federal, State, and local governmental entities.
- KK. “pH” means a measure of the acidity or alkalinity of a solution, expressed in standard units.
- LL. “Pollutant” means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, medical wastes, chemical wastes, biological materials, radioactive materials, heat, wrecked

or discarded equipment, rock, sand, cellar dirt, municipal, agricultural and industrial wastes, and certain characteristics of wastewater (e.g., pH, temperature, TSS, turbidity, color, BOD, COD, toxicity, or odor).

- MM “Potential to Discharge” means hard plumbing connected to the POTW’s sanitary sewer. This includes plumbing with shut-off valves and plumbing that has been plugged with temporary or removable plugs. Plumbing that has been permanently disconnected or cemented shut would not constitute a potential to discharge.
- NN “Pretreatment” means the reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to, or in lieu of, introducing such pollutants into the POTW. This reduction or alteration can be obtained by physical, chemical, or biological processes; by process changes; or by other means, except by diluting the concentration of the pollutants unless allowed by an applicable pretreatment standard.
- OO “Pretreatment Requirements” means any substantive or procedural requirement related to pretreatment imposed on a user, other than a pretreatment standard.
- PP “Pretreatment Standards” or “Standards” means prohibited discharge standards, categorical pretreatment standards, and local limits.
- QQ “Prohibited Discharge Standards” or “Prohibited Discharges” means absolute prohibitions against the discharge of certain substances; these prohibitions appear in the Ordinance.
- RR “Publicly Owned Treatment Works (POTW)” means a treatment works, as defined by Section 212 of the Act (33 U.S.C. 1292) which is owned by the City. This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature and any conveyances which convey wastewater to a treatment plant.
- SS “Return to compliance” means user is complying with the pretreatment requirements outlined in a permit, compliance schedule, or other agreement or order as outlined by the City and is discharging in compliance with applicable effluent limits.
- TT “Septic Tank Waste” means any sewage from holding tanks such as vessels, chemical toilets, campers, trailers, and septic tanks.
- UU “Sewage” means human excrement and gray water (household showers, dishwashing operations, etc.).
- VV “Significant Industrial User” means (except as provided in paragraph (3) below):
- (1) A user subject to categorical pretreatment standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N; or
  - (2) A user that:
    - Discharges an average of twenty-five thousand (25,000) gpd or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blowdown wastewater);
    - (a) Contributes a process wastestream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant;
    - (b) Is designated as such by the City on the basis that it has a reasonable potential for adversely affecting the POTW’s operation or for violating any pretreatment standard or requirement.
  - (3) The City may determine that an Industrial User subject to categorical pretreatment standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N is a Non-Significant Categorical Industrial User rather than a Significant Industrial User on a finding that the Industrial User never discharges more than 100 gallons per day (gpd) of total categorical wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:

- (a) The Industrial User, prior to the City's finding, has consistently complied with all applicable categorical pretreatment standards and requirements;
    - (b) The Industrial User annually submits the certification statement required in 40 CFR 403.12(q), signed and certified in accordance with the regulations, together with any additional information necessary to support the certification statement; and
    - (c) The Industrial User never discharges any untreated concentrated wastewater.
  - (4) Upon a finding that a user meeting the criteria in Subsection (2) has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the City may at any time, on its own initiative or in response to a petition received from a user, and in accordance with procedures in 40 CFR 403.8(f)(6), determine that such user should not be considered a significant industrial user.
- WW. "Slug Load" or "Slug" means any discharge at a flow rate or concentration which could cause a violation of the prohibited discharge standards of the SUO. A slug discharge is any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge which had a reasonable potential to cause interference and pass through or in any way otherwise violate the POTW's regulations, local limits or permit conditions.
- XX. "Standard Industrial Classification (SIC) Code" means a classification pursuant to the Standard Industrial Classification Manual issued by the United States Office of Management and Budget.
- YY. "Storm Water" means any flow occurring during or following any form of natural precipitation, and resulting from such precipitation, including snowmelt.
- ZZ. "Superintendent" means the person designated by the City to supervise the operation of the POTW, and who is charged with certain duties and responsibilities by this Ordinance, or a duly authorized representative.
- A1. "Total Suspended Solids (TSS)" means the total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquid, and which is removable by laboratory filtering.
- A2. "User" or "Industrial User" means a source of indirect discharge.
- A3. "Wastewater" means liquid and water-carried industrial wastes and sewage from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, whether treated or untreated, which are contributed to the POTW.
- A4. "Wastewater Treatment Plant" or "Treatment Plant" means that portion of the POTW which is designed to provide treatment of municipal sewage and industrial waste.

## **CHAPTER 7 EXHIBITS**

### **EXHIBIT A EXAMPLES OF DEFICIENCIES FOUND IN PERMIT APPLICATIONS**

- Are required toxic organic pollutants listed?

Example: An application from an Industrial user subject to federal categorical metal finishing regulations fails to list the presence or absence of any toxic organics.

Discussion: Industrial facilities subject to metal finishing categorical standards are regulated for III toxic organics (40 CFR 433. 11 (e)). To comply with the federal baseline monitoring report (BMR) requirements, the facility must monitor for those regulated toxic organics reasonably expected to be present, based on a process engineering analysis of the raw materials used and the possibility of any toxic organics present at the facility coming into contact with water and wastewater sources. If no toxic organics are used or expected to be discharged, this should be so stated by the facility's authorized representative. (Note: For the purposes of the BMR, had this industrial facility been subject to the total toxic organic (TTO) standard for the electrical and electronic components industrial category, it would have been required to monitor for all related toxic organics. The permit writer needs to check the specific categorical regulations to determine the TTO requirements for each category.

- Are all expected pollutants listed?

Example: A jobshop electroplater marks zinc and copper as "believed absent in the wastewater."

Discussion: If the facility discharges 10,000 gpd or more, zinc and copper are regulated by the electroplating categorical standards [40 CFR 413 Subpart A] and must be monitored even if they are not expected to be present in the discharge in significant quantities (40 CFR 403.12(b) and (e)). If the facility discharges less than 10,000 gpd, zinc and copper are not regulated and, therefore, not required, to be monitored by federal regulations; however, these pollutants may be present in trace amounts in proprietary chemicals or because the base material contained zinc or copper. A comprehensive test will determine whether any unexpected contaminants are present in significant quantities and will provide information and levels of pollutants, which are known to be present.

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## **EXHIBIT B INSPECTION/SAMPLING AND MONITORING INSTRUCTIONS**

### **A. INDUSTRIAL INSPECTIONS**

1. An inspection provides an opportunity for the pretreatment staff to review a permitted facility and determine if activities are in compliance with the permit. The results of the inspection shall provide the basis for which compliance and enforcement activities are generated.

Benefits of an inspection will be verification of data, assisting the industrial user in meeting the goals of the Program, and increased compliance efforts resulting from visibility of the City at the permitted facility.

2. Inspections will be performed at minimum of one time per year and two sampling visits annually on industrial users identified as SIUs and periodically on other dischargers to the POTW when the pretreatment staff determines it necessary.

An inspection will be conducted prior to issuing the permit.

3. Prior to conducting an inspection, the pretreatment staff will review the files of the industrial user.

The following items, at a minimum, shall be reviewed:

- a. The industrial user's permit
  - b. The status of any compliance schedule
  - c. Compliance history and status
  - d. Results of recent sampling and inspection
  - e. ASPP/SCP document
  - f. Completeness of permit file
  - g. Name of authorized representative or other contact
  - h. Required safety and security measures
  - i. The industrial user's pretreatment requirements
4. The type of inspection that is conducted will depend on the reason for the inspection, the classification of the industrial user, and the complexity of the operation or permitted facility.

The three types of inspection are scheduled, unscheduled, and demand.

- a. Scheduled inspections take place when the authorized representative of the industrial user is contacted beforehand and the inspection is mutually scheduled. Notice will be provided to the authorized representative a minimum of 24 hours prior to the desired time of the scheduled inspection. This type of inspection will be conducted when a detailed and thorough review of the industry is necessary. It may be necessary for the authorized representative of the permittee to be present so that the permittee's records may be reviewed and the inspector can be accompanied or assisted on the tour of the facility.

The frequency of conducting scheduled inspections will be based on the specific needs of the City in determining compliance on permitted activities of each industrial user.

A scheduled inspection will be conducted a minimum of one time per year for each industrial user identified as an SIU. The purpose of this inspection will be, at a minimum, to:

- (1) Collect and analyze a sample of the discharge and evaluate the data and information necessary to determine the industrial user's compliance with federal, state, and local pretreatment requirements
- (2) Identify changes in materials used, operational processes, or treatment processes that may affect the nature or volume of the discharge(s)
- (3) Update the database and permit file at the City
- (4) Verify the self-monitoring reports submitted by the industrial user

Tables 1 and 2 at the end of Section B, provides guidelines for this type of inspection.

- b. Unscheduled inspections take place usually when the pretreatment staff determines from the results of monitoring the industrial user, results of self-monitoring received from the industrial user, or information received from other sources that the permittee is in significant noncompliance or that there is some other need for a site visit. If the pretreatment staff has any reason to believe that the industrial user is not meeting the requirements of the discharge permit or pretreatment standards, or if the pretreatment staff determines that prior notice of the inspection to the authorized representative may interfere with obtaining the required information, an unscheduled inspection will be performed.

If a permittee is identified as being in significant noncompliance, the appropriate enforcement action, following the established enforcement response plan, will be taken and in addition an unscheduled inspection will be conducted as soon as the pretreatment staff becomes aware of this status but no later than 30 days after verification of the data that establishes this status. The inspection will be for the purpose of evaluating the permittee's recent efforts to reach compliance and may or may not include sampling.

The frequency of performing this type of inspection is unpredictable and will not be limited.

It is not necessary to give notice of an unscheduled inspection and at no time will more than two hours notice be given to the authorized representative of any industrial contact for this type of inspection.

- c. Demand inspections are usually performed in response to an emergency situation.

When notification is made to the City of an accidental discharge, slug load, or spill, the pretreatment staff will conduct appropriate inspections and/or sampling. An individual from the WWTP staff will be available, on call, 24 hours a day. The on-call member, once notified, will assess the seriousness of the situation and if necessary, will contact the plant operations/pretreatment supervisor, or other city staff member, for support; i.e., police, fire, and public works. This member will have access to the equipment typically needed for demand inspections and sampling (vehicle, safety equipment, sampling devices and containers, etc.). Sampling and inspection will be followed as outlined in this operational manual.

A demand inspection may require:

- (1) A determination of the nature, duration, and hazard of the industrial user's discharge
  - (2) Collection of samples to verify the characteristics of the discharge
  - (3) Identification of required corrective actions
  - (4) Documentation of completion of corrective actions or compliance activities
5. An inspection of any type will be well recorded. Documentation may include collection of samples, photographic evidence (if the industrial user will allow), or written documentation in the form of copies of operating records, flow data, etc.

Sampling, analysis, and collection of other information must be performed so that evidence is admissible in court (40 CFR 403.8 (f)(2)(vii))

The plant operations/pretreatment supervisor must compile the evidence and data that is collected and summarize the results in a written report to the Permit File that is maintained for that industrial user.

The inspection will be documented using a standard form. An example of an inspection record is included in Section F of this chapter for comprehensive inspections. This form, referred to as the "long form," provides a list of the questions commonly asked during a scheduled inspection. It may not benefit the inspector to use this form for an unscheduled or demand inspection as these types of inspections may not be as detailed as a scheduled inspection. A "short form" is provided in Section F of this chapter to assist in formatting the reports for brief inspections.

Investigation of noncompliance is necessary if noncompliance is determined during or as a result of the inspection.

6. The pretreatment staff must practice safety while conducting inspections. Section E of this chapter is a discussion of safety practices during monitoring and inspection.
7. The pretreatment staff will practice and encourage positive communication with industrial users during the inspections.

An example of this type of communication is suggesting to the industrial user that meeting requirements may save it money or that pollution prevention measures and practices may reduce the level of pretreatment that is needed.

Recommendation of specific methods or devices for treatment is inappropriate. However, providing the industrial user with sources of reference for particular problems may help to create a more positive working relationship between the industrial user and the City.

#### B. ENTRY PROCEDURES

8. Arrival for the inspection - The inspector will enter the industrial facility in the following manner to avoid any "unreasonable search" or procedural problems:
  - a. Arrive during normal business hours, unless it is an emergency situation or if other arrangements have been made with the industry;



- b. Enter the facility through the main gate, unless the facility has designated another point for entry;
- c. Locate the "person in charge" at the facility as soon as possible. Consent to enter the facility must be given by the owner or operator, or their designated representative. The inspector should learn who this individual is and develop a working relationship with that person. The inspector may want to have several industry contacts to grant entry in case the primary contact is not available. As long as the inspector is allowed to enter, the inspection is considered voluntary and consensual. A clear expression of consent is not necessary because an absence of an expressed denial is considered consent. If there is only a guard at the entrance, the inspector will present credentials and suggest that the guard call his/her superior or the responsible industry representative. The credentials indicate that the holder is a lawful representative of the City and is authorized to perform pretreatment inspections. These credentials are important documents and should never leave the sight of the inspector.

If the facility provides a blank sign-in sheet, log, or visitor's register, it is acceptable for the inspector to sign it, as long as there is no restrictive language associated with it. The inspector must not sign any type of "waiver" or release from liability form that would limit in any way the ability of the City to use the information obtained during the inspection. The inspector must not agree to any such restrictive condition of entry. In addition, the inspector must not sign any safety or personal harm waiver absolving the facility of any injury, which the inspector may incur while on-site. If the industry insists on such a waiver, the inspector should politely explain that he/she cannot sign and request a blank sign in sheet. In some instances, it may be possible to simply cross out the offensive language before signing, obtain a photocopy, and make a note in your field notebook about it. If the inspector is refused entry because he/she did not sign the release, he/she should leave and immediately report all pertinent facts to the supervisor or, preferably, the City's legal staff. All events surrounding the refused entry should be fully documented, and problems should be discussed cordially and professionally. Officials at the regulated facility must not be subjected to any form of intimidation or threats for failure to allow an inspector entry to the premises. The inspector's authority to inspect should not be abused, nor should the IU's right to refuse entry be attacked. Keep in mind that the inspector is at the facility to conduct an inspection, not to see a specific individual. If the normal contact is not in, the inspection should not be postponed.

The pretreatment inspector cannot be required to take a facility's safety training course prior to entry, but if the company has a relatively short safety briefing that will not interfere with the inspector's ability to complete the planned inspection, it may be worthwhile to attend.

- (1) Reluctance to give consent. The receptiveness of facility officials toward inspectors is likely to vary from facility to facility. Most inspections will proceed without difficulty. Because monitoring may be considered an adversarial proceeding to some industries, the inspector's legal authority, techniques, and competence may be challenged. If consent to enter is flatly denied, the inspector shall follow the denial of entry procedures outlined below. In other cases, officials may be reluctant to give consent for entry because of misunderstandings of responsibilities (e.g., officials may feel that the inspection is part of an enforcement proceeding against the company), inconvenience to the firm's schedule, or other reasons that

may be resolved through diplomacy and explanation on the part of the inspector.

One of the typical obstacles encountered by the inspector is a receptionist refusing entry because the inspector does not have an appointment. In this case, remind the receptionist that you are not there to see a specific individual but to inspect the facility. If entry is still refused, ask to speak to the environmental manager or owner of the facility. If that does not work, follow the denial of entry procedure outlined below. Another common obstacle is the statement, "There is nobody here who can authorize the inspection." In this instance, ask to speak to a supervisor, or show the receptionist the section of the sewer use ordinance, which authorizes the inspector's access to the facility. Do not threaten legal action, but clearly state your intent to inspect. Be professional, assertive and persistent, but if you still cannot gain entry, follow the denial of entry procedure outlined below.

Whenever there is difficulty in gaining consent to enter, inspectors should tactfully probe the reasons and work with officials to overcome any problems. In any instance where there is a misunderstanding or conflict due to the inspection, the inspector must avoid threats, inflammatory discussions, or language, which would deepen the antagonism. The inspector should be aware of his/her personal safety during such confrontations and avoid actions, which may enrage an individual who is irrational. If the situation is beyond the ability or authority of the inspector to manage, the inspector should leave and consult with the City's legal counsel.

- (2) Non-credentialed persons accompanying the inspector. The consent of the owner or agent in charge (i.e., industry representative) must be obtained for persons accompanying an inspector to enter a site if he/she does not have specific authorization (e.g., acting as an agent of the City). If consent is not given, such individuals may not enter the premises. If consent is given, these individuals may not view confidential business information unless officially authorized for access.
- (3) Denial of consent to enter. If an inspector is refused entry into a facility to conduct an inspection under an appropriate state or local law, the following procedural steps shall be taken:
  - (a) Present credentials. Make sure that all credentials have been presented to the facility owner or agent in charge.
  - (b) Tactfully discuss the reason for denial. If entry is not granted, courteously ask why. Diplomatically probe the reason for the denial to see if obstacles (such as misunderstandings) can be resolved. If the resolution of these conflicts is beyond the inspector's authority, he/she may suggest that the facility officials seek advice from their attorneys regarding a clarification of the pretreatment staff's inspection authority and right of entry.
  - (c) Carefully record observations in your field logbook. All observations pertaining to the denial will be noted carefully in the inspector's field logbook. Specifically, note the following:
    - i) Facility name and exact address;

- ii) Name, title, and authority of the person who refused entry;
- iii) Name, address, and telephone number of the facility's attorney (if readily available);
- iv) Date and time of refusal;
- v) Reason for the denial; and
- vi) Facility appearance (e.g., neat and orderly, or chaotic);

All of this information will be helpful in case a warrant is sought.

- (d) Avoid threatening or inflammatory statements. Under no circumstances shall the inspector discuss potential penalties or do anything that may be construed as coercive or threatening. If the inspector were allowed to enter the facility based on a threat of enforcement liability, it is likely that any evidence obtained through such an inspection would be deemed inadmissible in an enforcement proceeding.

On the other hand, an inspector may inform the facility representative that he/she intends to seek a warrant to compel the inspection. However, the inspector should be careful how this statement is phrased. Do not state: "I will get a warrant." If an enforcement action is brought against this facility using the information obtained in that inspection, a reviewing court may feel that the above statement usurped the court's authority to authorize a warrant and may deny the warrant. Even if the company later consents to the inspection following a statement that the inspector will get a warrant, there may be an issue as to whether consent was coerced. If the inspector decides to make a statement regarding a warrant, it should be phrased similar to: "I intend to seek (or apply for) a warrant."

- (e) Leave premises and contact supervisor. If entry is still denied after attempting to resolve the obstacles, the inspector should leave the premises after obtaining the information noted above in the field logbook. The inspector should contact his/her supervisor immediately after leaving the premises, and the supervisor should confer with the City's legal counsel regarding the desirability of obtaining a warrant. The City's legal counsel should attempt to resolve the conflict by contacting the facility's legal counsel prior to obtaining a warrant.
- (4) Withdrawal of consent during an inspection. Occasionally, a facility may consent to an inspection and later withdraw the consent while the inspection is in progress. Consent for the inspection may be withdrawn at any time after entry has been made. A withdrawal of consent is tantamount to a refusal of entry. Therefore, the inspector should follow the procedures cited above under denial of consent unless the inspection has progressed far enough to accomplish its purposes. All activities and evidence obtained prior to the withdrawal of consent are valid and may be used in an enforcement proceeding against the facility.
  - (5) Denial of access to parts of the facility. If, during the course of the inspection, access to some parts of the facility is denied, the inspector shall make a note of the circumstances surrounding the denial of access and of the portion of the inspection that could not be completed. The inspector shall then proceed with the rest of the inspection and shall

contact his/her supervisor after leaving the facility to determine whether a warrant should be obtained to complete the inspection. Refusal to allow entry is a violation of the Sewer Use Ordinance, and appropriate enforcement action will be taken.

- (6) Covert sampling in response to denial of entry. Whenever entry to a facility is denied, a sample shall be obtained at a manhole immediately downstream of the facility, if possible (**NOTE:** the inspector should be aware of the potential difficulties with the sample, i.e., are other facilities connected to that part of the sewer which discharge the pollutants of concern?). This type of sampling, however, may help with any further enforcement actions or investigations, which the pretreatment staff may undertake at the facility by uncovering activities, which the industry is attempting to hide. This type of sample is also effective when a demand inspection is being conducted because the pretreatment personnel can then compare the results of sampling from inside and just outside the plant to see if they match. This can provide evidence of any batches being dumped prior to entry to the facility.
- (7) Obtaining a search warrant for an inspection.
  - (a) If the inspector has been refused access to a building, structure, or property or any part thereof, and if the inspector has probable cause to believe that there may be a violation of this ordinance, or that there is a need to inspect as part of a routine inspection program of the City designed to protect the overall public health, safety, and welfare of the community, a search warrant may be necessary.
  - (b) The inspector will contact his/her supervisor and discuss the issue. The supervisor will contact the city attorney for the warrant.
  - (c) The pretreatment inspector will provide the city attorney with a list of specific requirements and locations. The city attorney will apply to the appropriate court for a search warrant describing therein the specific location subject to the warrant. The warrant shall specify what, if anything may be searched and/or seized on the property described.
  - (d) The warrant shall be served at reasonable hours by the plant operations/pretreatment supervisor/inspector in the company of a uniformed police officer of the City, and the inspection will be performed as previously discussed in this manual.

#### C. SAMPLING PROCEDURES

- 9. The concept of sample collection is based on the need for data for process control at the POTW, to determine compliance with the NPDES permit, and to determine industrial user compliance with the pretreatment standards and requirements.

The specific methods and procedures described in this section used in sample collection and preservation will be followed. The samples collected must truly represent what is being discharged during the sample collection period. Therefore, it is important to understand sample collection techniques and develop and practice standardized collection procedures. In addition, sampling, analysis, and collection of

other information must be performed to produce evidence that is admissible in court (40 CFR 403.8(f)(2)(vi)).

In addition to sampling techniques, it is essential to understand the importance of sample handling and preservation so that the integrity of the sample can be maintained from the point of sample collection through the completion of analysis of the sample (see Subsection 8).

10. The plant operations/pretreatment supervisor must perform sample collection in accordance with those procedures and requirements specified in 40 CFR Part 136. Subsequently, the City must require the industrial users to implement those procedures to meet self-monitoring requirements.
11. All sampling and analyses shall be performed in accordance with procedures established by the EPA Region 10 Administrator pursuant to Section 304(h) of the Act and contained in 40 CFR part 136 and its amendments or with any other test procedures approved by the EPA Region 10 Administrator. Where 40 CFR part 136 does not include sampling or analytical techniques for the pollutants in question, or where the Region 10 Administrator determines that the part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other sampling and analytical procedures, including procedures suggested by the City or other parties, approved by the Region 10 Administrator.
12. Preservation methods for each parameter to be measured are specified in 40 CFR Part 136.3 Table II. Prior to sample collection, a determination must be made of the parameters to be measured so that proper preservation techniques may be provided for.
13. Prior to sample collection, a determination must be made of the type of sample that is needed. The two types of samples are grab and composite.

Composite sampling: Influent and effluent operational data shall be obtained through 24-hour flow proportional composite samples. Sampling may be done manually or automatically, and discretely or continuously. If discrete sampling is employed, at least 12 aliquots shall be composited. Discrete sampling may be flow proportioned either by varying the time interval between each aliquot or the volume of each aliquot. All composites shall be flow proportional to either the stream flow at the time of collection of the influent aliquot or to the total influent flow since the previous influent aliquot. Volatile pollutant aliquots must be combined in the laboratory immediately before analysis.

A grab sample, as defined in 40 CFR Part 403, Appendix E, is an individual sample collected over a period of time not to exceed 15 minutes. It is a single sample taken at neither a specific time nor flow and is representative of conditions or characteristics of the discharge at the time that it is collected. The grab sample is required for specific analyses such as pH, oil and grease, cyanide, and phenol. (NOTE: an oil and grease grab must be collected directly into the sample container to prevent the loss of residuals on the collection instrument.)

14. A composite sample must be collected in relation to the flow rate or volume of the discharge being sampled. Flow proportioning may be performed by varying the time intervals between each aliquot or by proportioning the volume of each aliquot. In the event flow proportional sampling is not feasible, the City may authorize the use of time proportional sampling.

If the flow rate from an industry does not vary by more than  $\pm 15$  percent of the average flow rate, a time-interval composite using a constant sample volume and a constant time interval between samples will be used to provide a representative measurement of the wastewater characteristics and load discharged of the sample period. This will be done using an automatic sampler.

15. Sample collection techniques must be consistent so that the results are representative of the characteristics of the discharge that is sampled.

After determining the proper location to sample the discharge, collect the sample from a point where consistent mixing occurs. Do not collect from the top or bottom of a wet well where there is little flow or from the upstream side of a weir. This will prevent collection of floating or settled solids that are not representative of the discharge.

Collect the sample from the same location each time. Make sure that those involved in sample collection know the locations and the appropriate point to collect from so that the sample is consistently representative.

Use clean devices and equipment to collect the sample. Collect the necessary volume of sample to perform the required analyses and remember to account for duplicates and spikes when determining the volume. Be careful not to overfill sample bottles that contain preservative.

When collecting to verify an industrial user's compliance with local limits, collect a sample from the combined waste stream before or at the point of discharge to the City collection system. When collecting to verify an industrial user's compliance with categorical pretreatment standards, collect at the end of process before the process waste stream combines with other waste streams from the facility unless the industry uses the combined waste stream formula. If a sample is being collected for the purpose of determining a surcharge for extra-strength wastes, collect a sample from the combined waste stream before or at the point of discharge to the City collection system so the sample represents the characteristics of the total discharge from the facility.

Each representative of the City who will be involved in compliance monitoring or surcharge sampling must be adequately trained.

16. In order to verify the integrity of the sample from the point of collection to the point of reviewing the analytical results, the chain-of-custody must be recorded (example may be found in Section F [forms]). This part of the sample collection must be standardized to ensure consistency and accuracy.

The chain-of-custody record is a legal document that ensures that such information will be sufficient to produce evidence that would be admissible in judicial proceedings. It begins at the point of sample collection and ends when the analysis of the sample is complete. It is a permanent record and, therefore, must be legible and in black ink. It must reflect that the integrity of the sample was protected and that the sample truly represents what was collected. The record shall include, at a minimum, the following information:

- Name of the collector(s)
- Date and time collected
- Source description or location
- Type sample: grab or composite
- Method of preservation: refrigeration, acidification
- Identification number or tag number

- Required analyses
- May have description of container
- May have place for comments

The chain-of-custody record must have signatures of all who were involved in collecting the sample. If sampling is performed manually and occurs during more than one shift, the collector from one shift relinquishes the sample to the collector on the next shift and so on.

A person who is responsible for collection of a sample that may be used to support litigation must secure the sample so that no one can access it. Security must be observed especially when collecting with automatic samplers. The samplers will be locked so that neither the sample nor the sampler can be tampered with.

The chain-of-custody must have signatures of who received the sample into the laboratory.

The chain-of-custody records shall be reviewed at that time for completion of all signatures, dates, times, and other required information.

17. Sample collection is of no value if the procedures and techniques are not observed consistently and accurately during the collection process. Table 1 provides quality assurance procedures that will be used for optimizing the accuracy of sample collection and analysis.

Subsequently, the analyses must be in compliance with 40 CFR 136 Table II holding time and the results reviewed immediately to assure the utmost value of collecting the sample for determining compliance. Enforcement activities will be required if the results reflect a noncompliance and a determination of the need for corrective actions will have to be made.

18. The following is a list of sampling and analytical equipment available at the City of St. Helens Wastewater Treatment Plant laboratory for pretreatment sample and analysis:

- a. Fume hood
- b. DO meter
- c. Conductivity meter
- d. pH meter
- e. Incubator
- f. Water bath
- g. Drying oven
- h. Analytical balance
- i. Spectrophotometer
- j. Vacuum pump
- k. Assorted sample bottles
- l. Assorted grab sample devices
- m. Thermometers
- n. Compositors (6 total, 2 refrigerated)
- o. Refrigerators (3)
- p. Flammable storage locker

19. Detailed sampling methods.

- a. The plant operations/pretreatment supervisor will, by reading the industrial user permit, list all of the pollutant sampling and testing required of the user. The City will, monitor each IU for all pollutants that have limits established in the IU permit

on a frequency that is commensurate with the IUs discharge permit, but at least the minimum required in the City's NPDES permit.

- b. Each pollutant will be researched using 40 CFR Part 136.3, Table II, to find the pertinent requirements for each pollutant.
  - (1) Type of container;
  - (2) Type of preservative;
  - (3) Holding times;
  - (4) Appropriate storage temperature.
- c. If the testing for a pollutant is to be done by a contract laboratory, the laboratory will be requested to:
  - (1) Give direction as to
    - (a) Amount of sample required;
    - (b) Proper filling of the bottles;
    - (c) When and how the samples shall be shipped.
- d. Collect the sample following approved methods described above. If sample are to be shipped to a contract laboratory, a chain of custody form must be initiated to track the sample from sampling through final analysis. Insure that the sample is delivered to the contract laboratory.
- e. The City of St. Helens Wastewater Treatment Plant laboratory is set up to perform laboratory analysis on the following pollutants:
  - (1) BOD<sub>5</sub>;
  - (2) TSS;
  - (3) Chlorine residual (total);
  - (4) Color;
  - (5) pH;
  - (6) C BOD<sub>5</sub>;
  - (7) Temperature;
  - (8) Dissolved oxygen;
  - (9) Fecal coliform.

All other laboratory testing required will be performed by a contract laboratory. All laboratories performing sampling and analyses will conform to the requirements of 40 CFR Part 136, or as amended. Sample will be collected by the pretreatment or WWTP staff and sent to the appropriate contract laboratory.

AOX samples                      North Creek Labs  
20th Avenue NE 101  
Bothell, WA 98011-2569

Dioxin samples ALTA Labs, Inc.  
Robert J. Mathews Pkwy  
Suite 2  
El Dorado, CA 95630

All other routine analyses  
Kelso, WA  
Columbia Analytical Services



NOTE: The WWTP (POTW) superintendent will authorize the use of alternate contract laboratories after determining that the alternate laboratory quality control and quality assurance program provides adequate assurance of the laboratory's capability.

Quality Assurance Procedures for Pretreatment Field Analysis and Equipment are in a separate document and not contained in this document.

D. SAFETY DURING MONITORING AND INSPECTION.

20. The purpose of any safety program is to create and maintain a safe environment in which to work. Working in the pretreatment division of the wastewater treatment field can lead to contact with many potentially hazardous situations. Typical hazards to be aware of are:

- a. Confined Spaces
  - (1) Oxygen deficiency
  - (2) Toxic or suffocating gases
  - (3) Explosive gas mixtures
- b. Physical injuries
- c. Infections and infectious diseases

21. The nature of the job dictates that many times industrial monitoring samples must be taken from locations are considered to be confined spaces. Most of the time these will be manholes in discharge lines that lead to main collection systems. However, there may be a need to read a water meter in an underground water meter or valve box. This is also a confined space where hazardous conditions can exist.

Each year a significant number of people in the water and wastewater profession die needlessly because they did not adhere to the rules concerning confined spaces.

OSHA has defined and published regulations covering confined spaces. These can be found in 29 CFR Part 1910, Section 120. Employers are required to train employees in the recognition and safety practices governing confined spaces.

Confined space entry will be performed following the approved City of St. Helens confined space entry program.

22. At times it may be necessary to obtain a sample from a manhole that is located in a street. Traffic safety then becomes a very important factor.

Two main rules of traffic safety are:

- a. **Be visible to oncoming traffic.**

In order to be visible to oncoming traffic, it is essential that proper personal protective equipment be used. Always wear an orange safety vest. A hard-hat and safety glasses are also recommended.

- b. **Safely guide traffic around you.**

- (1) Keep your vehicle between you and your work area, preferably about ten feet from the manhole on the oncoming traffic side. Turn the wheel of the vehicle away from yourself and oncoming traffic. (If someone in the oncoming traffic fails to observe the situation, let him or her hit the vehicle, not you.)
  - (2) Always use proper safety equipment to alert traffic to the situation (emergency flashers, rotating beacons, and warning signs). Use orange traffic cones to divert traffic around your work area. Be alert at all times.
23. Use proper equipment and use equipment properly. Always be alert for the seemingly simple things. Manhole covers are heavy; therefore, use the proper equipment to open them.

When dealing with manhole covers, autosamplers, and other heavy objects, use proper lifting procedures. Use your legs instead of your back. Avoid the most common industrial injury, the back injury.

Always use the proper personal protective equipment (PPE). Slips and falls are leading causes of industrial accidents. The results of these are often cuts, bruises, broken bones, and even death. The proper use of PPE, such as a safety harness, hardhat, safety glasses, boots and gloves, will eliminate many physical injuries that can occur. Each year a large number of injuries are reported that otherwise would have been avoided with the proper use of PPE.

In order to use the right PPE, you must be aware of whatever hazards might be encountered. Be familiar with the industry that you are monitoring. Know what raw materials are being used. Know what chemicals you might encounter and use the Material Safety Data Sheets (MSDS) on these materials. Be prepared for any reaction that might occur due to the mixing of raw materials.

Even if you know it is safe, always use rubber gloves and safety glasses when dealing with industrial discharges.

24. Develop and implement training on the use of monitoring vehicles.

If specially designed vehicles are being used for industrial monitoring, certify each inspector on the use and handling of them. Areas of special concern, especially for oversized vehicles, are vehicle dimension and blind spots. Know the monitoring and traveling locations where the vehicle "won't fit" and plan activities around these areas or use another vehicle. Install extra mirrors, if necessary, to eliminate blind spots.

25. Working in the pretreatment profession guarantees that you are going to come into contact with a wide variety of bacteria and pathogens; therefore, personal hygiene is extremely important. With the chance of contact with potentially harmful substances, the need for proper use of PPE cannot be stressed enough.

Always observe the following:

- a. Wash your hands thoroughly before eating, drinking, or smoking.
- b. Protect all cuts and open sores.
- c. Any bandages covering open wounds should be changed frequently.

- d. If you do receive a cut or scrape, immediately clean it with soap and water, disinfect the wound, and report it.
- e. Never wear contaminated clothing home.

26. The rules for industrial inspection safety are simple. **BE PREPARED FOR ANYTHING.**

The following are some rules for conducting a safe industrial inspection:

- a. Follow the safety procedures of the facility you are inspecting.
  - b. Have your own PPE available.
    - (1) Safety glasses
    - (2) Hard hat
    - (3) Hearing protection
  - c. Review all available data before inspecting.
    - (1) Previous inspection data (if available)
    - (2) MSDS information (it shall be on file with the industry being inspected)
27. Keep all equipment and tools clean and in good operating condition. Improper operating equipment and tools can cause accidents. Keep storage areas neat and clean. Safety isn't just for fieldwork!

## EXHIBIT C INSPECTION CHECKLIST

### Inspection Checklist

#### General Information

Date of Inspection:

Inspected by:

Scheduled Inspection

Present at the Inspection:

Name

Title

Company

#### General Facility Information

Industry Name:

SIC codes:

Site address:

Mailing address:

Industry contacts:

Name

phone

Fax

Facility description:

Categorical standard:

Employee showers on site:

Pollutants covered by local limits:

Scheduled shutdown periods:

Number of employees:

Seasonal production:

Inspection Checklist

Number of shifts per day:

Work days per week:

Hours of operation per day

Products produced:

Amount of finished product:

Raw materials used:

Manufacturing process used:

Current long-term average production rate:

Changes since last inspection: *i.e. production, raw materials usage, and amount finished product.*

Planned changes to the plant:

Date facility commenced discharge to the POTW:

Are O&M schedules available at the facility?

Are there O&M policies and procedures?

Is O&M training adequate: *Module, Team Training*

Is facility currently in compliance?

#### Wastewater Treatment Systems

Does the industry treat its process wastes prior to discharge to the POTW?

Are any treatment units out of service?

Adequate system in place to correct a problem:

Unauthorized bypasses in place:

Unauthorized discharge points in service:

Treatment type:

Treatment system modified since installation:

Design flow:

Actual flow:

Operating schedule:

Reagents used:

FTEs (full time employees) needed to operate

Description of overall condition:

Has the system experienced operational problems?

#### Sludge Generation / Waste Disposal

Sludge dewatering method:

Moisture content:

Amount generated: .

Disposal method: .

Sludge storage:

Shipment frequency:

Sludge hauler:

Hazardous sludge generated:

Hazardous waste discharged to the POTW:

Manner of Hazardous Waste disposal: .

#### Combined Wastestream Formula \ Permit Limits

Can flow be measured at all sampling locations:

What type of measuring device is used?

Flow Meter Calibration schedules (*Technician Certified*)

Is the CWF (combined wastestream formula) used at the facility?

Is the facility using dilution to meet its effluent limits?

Should the facility be using the combined wastestream formula?

Are there any dilution flows, which have not been accounted for?

#### Chemical Storage

What chemicals are used at the facility?

Can chemicals reach floor drains if spilled?

How often are floors washed:

What chemicals are used?

How often is equipment washed, what chemicals used:

Does the industry have a slug control program?

Has the industry had any past slug discharges?

Amount of water used in wash downs:

Production/Process Areas of the Industrial User

Are wastestreams separated at the facility?

Are incompatible materials separated?

Do floor drains/troughs lead to the POTW?

Are temporary hoses in place as part of production?

Are pipes labeled/color coded for easy identification?

Is a piping diagram available at the facility?

Attach a schematic, water flow,

Wastewater production, and a stepwise

*(Description of the production process at the facility: Please refer to the Accidental Spill Prevention Plan)*

## Industry Checklist

### Monitoring, Record Keeping and Reporting

#### Monitoring

Permit Sampling Location	Typical Parameter Data	Permit Limit	Permit Sampling Frequency	Industry Sampling Frequency	Parameters



## Industry Checklist

Discrepancies between permit requirements and Industry practice for:

- Sample location:
- Sampling frequency: Consider *Increasing BOD frequency* to meet 2X/wk and lower concentration data
- Sampling method:

Are the permit requirements appropriate for:

- Sample locations:
- Permit limits:
- Sample method:
- Sample frequency:

What changes are needed in the permit?

Composite sampler

Samples analyzed according to 40 CFR 136:

Are samples preserved according to part 136?

Samples analyzed within required holding times:

Samples taken during periods of process discharge only:

Samples analyzed in-house or contract:

Is required analytical certification used?

## Record Keeping

All information kept for three years:

All required information available, current and complete:

Are all sample results included in the IU's report?

Did the facility report results of any more frequent sampling in the last reporting period:

Were all results reported?

POTW notified of all violations within 24 hours:

Do sample results match what is reported by the industry?

## EXHIBIT D ENVIRONMENTAL SCREENING, SURVEY AND FORMS



### NON-DOMESTIC Environmental SCREENING Survey

Date \_\_\_\_\_

Treatment Plant: City of St. Helens POTW\_  
Service Area: St. Helens

#### GENERAL INFORMATION

1. Company name: \_\_\_\_\_
2. Address of the facility: \_\_\_\_\_  
\_\_\_\_\_
3. Mailing address: \_\_\_\_\_  
\_\_\_\_\_
4. Contact Person:  
Name \_\_\_\_\_  
Title \_\_\_\_\_ Telephone \_\_\_\_\_ FAX \_\_\_\_\_
5. Brief description of business--principal products and services:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
7. Will this business produce any pollutants of concern other than oils, grease, or fats. .... [ ] Yes [ ] No
8. Are any of these devices installed?
  - a. Oil and water separator..... [ ] Yes [ ] No
  - b. Oil and Grease trap..... [ ] Yes [ ] No
  - c. Sand/sediment trap..... [ ] Yes [ ] No

E.S.F. Required [ ] Yes [ ] No

Signature \_\_\_\_\_

Date E.S.F. Mailed \_\_\_\_\_

Print name: \_\_\_\_\_

The Industrial Waste Survey (IWS) for the City of St. Helens was conducted beginning February 1, 1989, pursuant to Section 403.8(f)(2) of the General Pretreatment Regulations in accordance with the EPA Guidance Manual for POTW Pretreatment Program Development, dated October 1983. A master list of all industrial users (IUs) discharging to our treatment system was developed by consulting existing water and sewer user accounts, and the lists of fully regulated and small quantity generators in Oregon, dated July 20, 1988.

Questionnaires were mailed to all on the list, with follow-up telephone activities until all survey forms were returned. All sites were then visited to determine the accuracy and completeness of the responses.

The City reviewed and updated the list in 1993, with no new SIUs identified.

(Date)

Dear Customer:

The City of St. Helens is required by the State Department of Environmental Quality to conduct an Industrial Survey of the users within our boundaries. The reason for this survey is to determine if any influent into the treatment plant would be detrimental to the normal treatment process

We are asking that you please fill out the attached questionnaire as accurately and thoroughly as possible, and return it to our office. We have enclosed a stamped self-addressed envelope for your convenience. Please make sure that the name of the company, address, and owner's name are included on the form.

In the next few weeks, you may be visited by a representative from the City of St. Helens to answer any questions you may have and to gather any additional information we may need for this survey.

If you have any questions, please feel free to call this office at 503-397-6272.

Thank you for your cooperation.

Sincerely,

Plant operations/pretreatment supervisor  
City of St. Helens

jb

Attachment

## Environmental Survey Instructions

Instructions for Completing Page 80

### Section A--General Information

- A1. Enter the name or title of your business.
- A2. Enter the division name, if applicable.
- A3. Enter the address of the facility discharging to the City's sewer system.
- A4. Enter mailing address if different than A3.
- A5. Give the name of the person who is thoroughly familiar with the facts reported on this form and who can be contacted by the City staff.
- A6. Give a brief description of the facility. Include products or services.
- A8. Include all numbers that apply to business. Leave blank if not known.
- A13. Types of environmental permits to list include but are not limited to air, hazardous waste, NPDES for discharges to surface waters.
- A16. Process wastewater could be discharged through a direct connection to the City's collection system or through floor drains.

\*This form should be signed by a responsible corporate officer, a general partner, or by a duly authorized representative. See 40 CFR 403.12(l) for full definition.

Return completed form to:

Plant operations/pretreatment supervisor  
City of St. Helens  
P.O. Box 278  
St. Helens, OR 97051



# Environmental Survey Wastewater Generating Characteristics

LEAVE BLANK City Use Only

Date Received: \_\_\_\_\_

Please complete in full, either typed or printed clearly.

Treatment \_\_\_\_\_

Service Area: \_\_\_\_\_

Pump Stations: \_\_\_\_\_

## SECTION A - GENERAL INFORMATION

A1. Company name: \_\_\_\_\_

A2. Division name: \_\_\_\_\_

A3. Address of the facility: \_\_\_\_\_

A4. Mailing address: \_\_\_\_\_

A5. Representative completing this form:

Name \_\_\_\_\_

Title \_\_\_\_\_ Telephone \_\_\_\_\_ FAX \_\_\_\_\_

A6. Brief description of business--principal products and services:

\_\_\_\_\_

A7. Is the building currently connected to public sewer system? ..... [ ] Yes [ ] No

If no, have you applied for a sewer connection? ..... [ ] Yes [ ] No

Estimated date of connection \_\_\_\_\_

A8. Standard Industrial Classification Number(s) (SIC Code if known).

\_\_\_\_\_

A9. Do you or will you discharge oils, grease, or fats to the public sewer? ..... [ ] Yes [ ] No

A10. Do you use any of the following devices?

a. Oil and water separator..... [ ] Yes [ ] No

b. Oil and Grease trap ..... [ ] Yes [ ] No

c. Sand/sediment trap ..... [ ] Yes [ ] No

A11. How often do you clean the oil and grease trap? Where do you dispose of trapped oil and grease?

\_\_\_\_\_

A12. Do you or will you have chemical storage containers, bins, or ponds at your facility? ..... [ ] Yes [ ] No

Do you have any underground storage tank(s)? ..... [ ] Yes [ ] No

A13. Have you been issued a local, state, or federal environmental permit? ..... [ ] Yes [ ] No

If yes, please list the type of permit(s). \_\_\_\_\_

A14. Do you or will you have floor drains in your manufacturing or storage area? ..... [ ] Yes [ ] No

If you have chemical storage containers, bins, ponds, or floor drains in a manufacturing or storage area,

could an accidental spill lead to a discharge to an onsite disposal system (e.g., through a floor drain)? ..... [ ] Yes [ ] No

To a public sewer? ..... [ ] Yes [ ] No

To a storm drain? ..... [ ] Yes [ ] No

To ground? ..... [ ] Yes [ ] No

A15. Do you or will you discharge wastewater (other than domestic waste from bathrooms, toilets, etc.) to an onsite disposal system?

..... [ ] Yes [ ] No

To a storm sewer? ..... [ ] Yes [ ] No

A16. Do you or will you discharge wastewater (other than domestic waste from bathrooms, toilets, etc.) to the public sewer system?

..... [ ] Yes [ ] No

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 ensure 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\* \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

### Instructions for Completing Page 82

General Instructions: Please indicate those sections of this questionnaire that you wish to remain confidential and your basis for requiring confidentiality. (Wastewater characteristics cannot be confidential.)

B2. Provide the daily average and peak flows of waste generated in gallons per day (gal/day) for the last 12 months. The average flows can be calculated by dividing the total flows (of the last 12 months) by the number of days that a discharge of water occurred (or operating days).

- For estimating sanitary flows, use 35 gallons per each employee.

Include the day(s) of the week and duration (length of time) of discharge to the sewer system. Include day(s) of the week and approximate time for normal cleanup activities.

B3. List the types of products, giving the common or brand name. Enter from your records the amounts produced daily for the previous calendar year and the process used.

B4. Provide the water source(s) from which you get your water. If there is more than one source, list each source. Provide the water account number if the source is City water. To convert quantities from your water bill in hundred cubic feet (CCF) to gal/day, multiply CCF by 748.

B5. Estimate wastewater discharge quantities.

# Environmental Survey

## SECTION B - DETAILED WASTEWATER INFORMATION

Company Name

Facility Address

B1. Please describe processes to be used in your facility that will result or may result in wastewater discharge to the public sewer system.

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B2. This facility generates or will generate the following types of wastes (check all that apply):

	Average gallons per day	Peak gallons per day
<input type="checkbox"/> Domestic wastes (restrooms, employee showers; estimate 35 gallons per day for each employee)		
<input type="checkbox"/> Cooling water, noncontact		
<input type="checkbox"/> Boiler/tower blowdown		
<input type="checkbox"/> Cooling water, contact		
<input type="checkbox"/> Process		
<input type="checkbox"/> Equipment/facility washdown		
<input type="checkbox"/> Air pollution control unit		
<input type="checkbox"/> Stormwater runoff to sewer		
<input type="checkbox"/> Other (describe)		
<input type="checkbox"/> Cleanup		
Total		

Time and Duration of Discharge: \_\_\_\_\_

Cleanup Time: \_\_\_\_\_

B3. Products Produced: (Attach additional sheets as necessary)

Type	Amount and Rate of Production	Process

B4. Water supplied from:  
(e.g., City or well)

Water Source(s)	Water Acct No.	Water Quantities <sup>1</sup>	
		Estimated <sup>2</sup>	Meter
a.			gal/day
b.			gal/day
c.			gal/day
Total			

<sup>1</sup>1 ccf = 748 gallons

<sup>2</sup>Best estimate if not metered

B5. Wastes are discharged or may be discharged to:

(check all that apply)	Average gallons per day	Peak gallons per day
<input type="checkbox"/> Sanitary sewer		
<input type="checkbox"/> Storm sewer		
<input type="checkbox"/> Surface water		
<input type="checkbox"/> Groundwater (onsite disposal)		
<input type="checkbox"/> Waste haulers		
<input type="checkbox"/> Other (describe)		
Total		

Are the discharges batch ☐? continuous ☐?



Instructions for Completing Page 83

- B6. Answer yes or no.
- B7. If the answer to B6 is yes, describe the types of wastes.
- B8. If the answer to B6 is yes, describe your storage and disposal practices for these wastes. An onsite disposal system could be a septic system, lagoon, or holding ponds (evaporative-type).
- A batch discharge is one that results from the draining of storage tanks or process tanks, or intermittent boiler blowdown.
- B6. Are any liquid wastes or sludges from this firm disposed of by means other than discharge to the sewer system?  
☐ Yes ☐ No If "no," skip Items B7 and B8; If "yes," complete Items B7 and B8.
- B7. These wastes may best be described as:

<u>Item No.</u>	<u>Estimated gallons or pounds per year</u>
<input type="checkbox"/> Acids	_____
<input type="checkbox"/> Alkalies	_____
<input type="checkbox"/> Heavy metal sludges	_____
<input type="checkbox"/> Inks/	_____
<input type="checkbox"/> Oil and/or grease	_____
<input type="checkbox"/> Organic compounds	_____
<input type="checkbox"/> Paints	_____
<input type="checkbox"/> Pesticides	_____
<input type="checkbox"/> Plating wastes	_____
<input type="checkbox"/> Pretreatment	_____
<input type="checkbox"/> Solvents/thinners	_____
<input type="checkbox"/> Other hazardous wastes (specify)	_____
_____	_____
_____	_____
<input type="checkbox"/> Other wastes (specify)	_____
_____	_____
_____	_____

- B8. For the above checked wastes, does your company practice:

☐ Onsite storage  
location \_\_\_\_\_

☐ Offsite storage  
hauler's name \_\_\_\_\_  
address \_\_\_\_\_  
hauler's DEQ permit # \_\_\_\_\_  
phone number \_\_\_\_\_

☐ Onsite disposal

☐ Offsite disposal  
hauler's name \_\_\_\_\_  
address \_\_\_\_\_  
hauler's DEQ permit # \_\_\_\_\_  
phone number \_\_\_\_\_

Describe the method(s) of storage or disposal checked above.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Do you have an EPA or DEQ permit for storage or hauling? ☐ Yes ☐ No If yes, attach a copy of the permit.

Instructions for Completing Page 85

- B9. List all chemicals regularly used in your facility. Indicate where they would most likely enter into the City's sewer system or storm system or both.
- B10. Indicate if the fire bureau has been notified of your onsite storage practices.
- B11. Answer yes or no. If yes, attach plans.
- B12. Indicate the characteristics of the wastewater. Priority pollutants are listed in Attachment A. If your facility's discharge may include any priority pollutants, Attachment A must be completed.
- B13. If any laboratory analyses have been performed on wastewater discharged from your facility, attach a copy of the results.

- B9. List all principal materials regularly used in your facility that may be present in your wastewater discharge (e.g., cleaning agents, solvents, food processing waste, plating solutions, catalysts, milk wastes, and ink). Identify chemical constituents, if known, or brand name. Attach material safety data sheets.

Generic Type	Amount per year	<u>Discharged to</u>		<u>Spill Potential</u>		Chemical Constituents or brand name
		Storm	Sanitary	Storm	Sanitary	
a. Example: Degreaser						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						
j.						
k.						

(Attach additional sheets if necessary)

- B10. Have you recorded with the fire bureau the onsite storage of flammable or combustible liquids or solids, hazardous chemicals, or radioactive materials?  
☐ Yes ☐ No

If yes, list materials, if any, and their scientific or common and brand names and what quantities are being stored (use extra sheets if needed or attach a copy of fire bureau list).

<u>S-Scientific/C-Common</u>	<u>Brand Name</u>	<u>lbs or gallons</u>
a.		
b.		
c.		
d.		

- B11. Do you have an accidental spill prevention program for the facility? ☐ Yes ☐ No Emergency response plan? ☐ Yes ☐ No  
 If yes, attach plans.

- B12. Characteristics of Wastewater:

- a. Temperature \_\_\_\_\_ Don't know ☐  
 b. pH level \_\_\_\_\_ Don't know ☐  
 c. Flammable or explosive materials Yes ☐ No ☐ Don't know ☐  
 d. Solid or viscous materials Yes ☐ No ☐ Don't know ☐  
 e. Priority pollutants Yes ☐ No ☐ Don't know ☐ If yes, complete Attachment A.  
 (See Attachment A for the priority pollutants list)

- B13. Attach any wastewater analysis that has been performed on the wastewater discharge(s) from your facilities in the last year. Attach a copy of the most recent lab data to this questionnaire. Be sure to include the date of the analysis, name of laboratory performing the analysis, and location(s) from which sample(s) were taken (attach sketches and plans as necessary).

Instructions for Completing Page 86

B14. A facility who checks off activities listed under Section A are covered by the Environmental Protection Agency's (EPA) categorical pretreatment standards and the City's local pretreatment standards. These facilities are termed categorical users. Businesses that check off activities listed under Section B are termed noncategorical users and are covered by the City's local pretreatment standards. If you have any questions regarding how to categorize your business activity, contact the City for technical guidance.

B14. If your facility uses processes in any of the industrial categories or business activities listed below and any of these processes generate or cogenerate wastewater or waste sludge, place a check beside the category or business activity (check all that apply).

a. Industrial Categories

EPA Category Code	Category
467	<input type="checkbox"/> Aluminum forming
461	<input type="checkbox"/> Battery manufacturing
434	<input type="checkbox"/> Coal mining
465	<input type="checkbox"/> Coil coating
468	<input type="checkbox"/> Copper forming
469	<input type="checkbox"/> Electric & electronic components
413	<input type="checkbox"/> Electroplating (If checked, please complete Attachment B)
415	<input type="checkbox"/> Inorganic chemicals
420	<input type="checkbox"/> Iron & steel
425	<input type="checkbox"/> Leather tanning & finishing
433	<input type="checkbox"/> Metal finishing (If checked, please complete Attachment B)
464	<input type="checkbox"/> Metal molding & casting (Foundries)
471	<input type="checkbox"/> Nonferrous metals forming
421	<input type="checkbox"/> Nonferrous metals manufacturing
414 & 416	<input type="checkbox"/> Organic chemicals, plastics, & synthetic fibers
455	<input type="checkbox"/> Pesticides
419	<input type="checkbox"/> Petroleum refining
439	<input type="checkbox"/> Pharmaceuticals
463	<input type="checkbox"/> Plastics processing
466	<input type="checkbox"/> Porcelain enamel
430 & 431	<input type="checkbox"/> Pulp, paper, and fiberboard
428	<input type="checkbox"/> Rubber
423	<input type="checkbox"/> Steam electric
410	<input type="checkbox"/> Textile mills
429	<input type="checkbox"/> Timber products (wood preserving)

b. Other Business Activities

<input type="checkbox"/>	Adhesives
<input type="checkbox"/>	Analytical laboratories
<input type="checkbox"/>	Auto laundries
<input type="checkbox"/>	Beverage bottler
465	<input type="checkbox"/> Can making
405	<input type="checkbox"/> Dairy products
<input type="checkbox"/>	Dry Cleaners
457	<input type="checkbox"/> Explosives manufacturing
407	<input type="checkbox"/> Food/edible products processor
<input type="checkbox"/>	Gas stations
454	<input type="checkbox"/> Gum & wood chemicals
<input type="checkbox"/>	Health services
460	<input type="checkbox"/> Hospital
<input type="checkbox"/>	Laundries
<input type="checkbox"/>	Machine shops
<input type="checkbox"/>	Mechanical products
440	<input type="checkbox"/> Ore mining
446 & 447	<input type="checkbox"/> Paint & ink
459	<input type="checkbox"/> Photographic supplies
<input type="checkbox"/>	Printing & publishing
<input type="checkbox"/>	Radiator shops
<input type="checkbox"/>	Slaughter/meat packing/rendering
417	<input type="checkbox"/> Soaps & detergents
<input type="checkbox"/>	Used oil reclaimers
<input type="checkbox"/>	Waste recycler
<input type="checkbox"/>	Other _____

B15. Attach a simple schematic drawing(s). Approved building plans with required details may be substituted.

Example:

B15. Attach a simple schematic drawing(s) of your facility, indicating: (Drawings should be 11 x 17, or smaller)

- a. Location and size of all service outlets, process drains, floor drains
- b. Existing sampling manholes or locations where samples may be collected
- c. Current or planned flow metering equipment
- d. Current or planned automatic sampling equipment
- e. Location of pretreatment processes, treated flows, and untreated flows
- f. Location and name of pertinent streets
- g. Flow schematic to indicate process and process discharge in gallons per day
- h. Chemical storage location
- i. Storm drain location, if known

B16. Pretreatment devices or processes used for treating wastewater or sludge (check as many as appropriate)

- ☐ Air flotation
- ☐ Carbon filtration
- ☐ Centrifuge
- ☐ Chemical precipitation
- ☐ Chlorination
- ☐ Cyclone
- ☐ Evaporation
- ☐ Filtration
- ☐ Filtration, multi-media
- ☐ Filtration, rotary
- ☐ Filtration, sand
- ☐ Flow equalization
- ☐ Grease or oil separation, type \_\_\_\_\_
- ☐ Grease trap
- ☐ Grinding filter
- ☐ Grit removal
- ☐ Ion exchange
- ☐ Neutralization, pH correction
- ☐ Ozonation
- ☐ Reverse osmosis
- ☐ Screen
- ☐ Sedimentation
- ☐ Septic tank
- ☐ Solvent separation
- ☐ Spill protection
- ☐ Sump
- ☐ Biological treatment, type \_\_\_\_\_
- ☐ Rainwater diversion or storage \_\_\_\_\_
- ☐ Other chemical treatment, type \_\_\_\_\_
- ☐ Other physical treatment, type \_\_\_\_\_
- ☐ Other, type \_\_\_\_\_
- ☐ No pretreatment provided

B17. Is additional pretreatment required? ☐ Yes ☐ No ☐ Don't know If yes, describe necessary pretreatment.

B18. Is industry in compliance with City industrial pretreatment ordinance? ☐ Yes ☐ No ☐ Don't Know  
See ordinance.

B19. Is industry in compliance with federal categorical standards? ☐ Yes ☐ No ☐ Don't Know

B20. Are any process changes or expansions planned during the next three years? ☐ Yes ☐ No  
If yes, attach a separate sheet to this form describing the nature of planned changes or expansions.

B21. Please describe any previous spills and remedial measures taken to prevent their reoccurrence:

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B22. Include comments here.

Certification requirements are listed in 40 CFR 403.12(l). This form must be signed by a responsible corporate officer, a general partner, or duly authorized representative.

Return the completed form to:

City of St. Helens  
Plant operations/pretreatment supervisor  
PO Box 278 / 265 Strand St.  
St. Helens, OR 97053

Complete Attachments A, B, and C as required.

B22. Comments:

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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 ensure 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\* \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

\*This form should be signed by a responsible corporate officer, a general partner, or by a duly authorized representative. See 40 CFR 403.12(l) for full definition.

Attachment A  
PRIORITY POLLUTANT INFORMATION

1. Please indicate by placing an "X" in the appropriate space by each listed chemical whether it is suspected to be absent, known to be absent, suspected to be present, or known to be present in your manufacturing or service activity or if it is generated as a byproduct. Some compounds are known by other names. Please refer to the Priority Pollutant Synonym Listing for those compounds that have an asterisk (\*).

Item No.	CASRN	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
1	7664417	ammonia				
2	1332214	asbestos (fibrous)				
3	57125	cyanide (total)				
4	7440360	antimony (total)				
5	7440382	arsenic (total)				
6	7440417	beryllium (total)				
7	7440439	cadmium (total)				
8	7440473	chromium (total)				
9	7440508	copper (total)				
10	7439921	lead (total)				
11	7439976	mercury (total)				
12	7440020	nickel (total)				
13	7782492	selenium (total)				
14	7440224	silver (total)				
15	7440280	thallium (total)				
16	7440666	zinc (total)				
17	83329	acenaphthene				
18	208968	acenaphthylene				
19	107028	acrolein				
20	107131	acrylonitrile				
21	309002	aldrin				
22	120127	anthracene				
23	71432	benzene				
24	92875	benzidine				
25	56553	benzo(a)anthracene*				
26	50328	benzo(a)pyrene*				
27	205992	benzo(b)fluoranthene				
28	191242	benzo(g,h,i)perylene*				
29	207089	benzo(k)fluoranthene*				
30	319846	a-BHC(alpha)				
31	319857	b-BHC(beta)				
32	319868	d-BHC(delta)				
33	58899	g-BHC*(gamma)				
34	111444	bis(2-chloroethyl)ether*				
35	111911	bis(2-chloroethoxy)methane*				
36	108601	bis(2-chloroisopropyl)ether*				
37	542881	bis(chloromethyl)ether*				
38	117817	bis(2-ethylhexyl)phthalate*				
39	75274	bromodichloromethane*				
40	75252	bromoform*				
41	74839	bromomethane*				
42	101553	4-bromophenylphenyl ether				
43	85687	butylbenzyl phthalate				
44	56235	carbon tetrachloride*				
45	57749	chlordane				
46		4-chloro-3-methylphenol*				

Item No.	CASRN	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
47	108907	chlorobenzene				
48	75003	chloroethane*				
49	110758	2-chloroethylvinyl ether				
50	67663	chloroform*				
51	74813	chloromethane*				
52	91587	2-chloronaphthalene				
53	95578	2-chlorophenol*				
54	7005723	4-chlorophenylphenyl ether				
55	218019	chrysene*				
56	72548	4,4'-DDD*				
57	72559	4,4'-DDE*				
58	50293	4,4'-DDT*				
59	53703	dibenzo(a,h)anthracene*				
60	124481	dibromochloromethane*				
61	95501	1,2-dichlorobenzene*				
62	541731	1,3-dichlorobenzene*				
63	106467	1,4-dichlorobenzene*				
64	91941	3,3-dichlorobenzidine				
65	75718	dichlorodifluoromethane*				
66	75343	1,1-dichloroethane*				
67	107062	1,2-dichloroethane*				
68	75354	1,1-dichloroethene*				
69	111444	trans-1,2-dichloroethene*				
70	120832	2,4-dichlorophenol				
71	78875	1,2-dichloropropane*				
72	542756	(cis & trans)1,3-dichloropropene*				
73	60571	dieldrin				
74	84662	diethyl phthalate*				
75	105679	2,4-dimethylphenol*				
76	131113	dimethyl phthalate				
77		di-n-butyl phthalate				
78		di-n-octyl phthalate*				
79		1,6-dinitro-2-methylphenol*				
80	51285	2,4-dinitrophenol				
81	121142	2,4-dinitrotoluene				
82	606202	2,6-dinitrotoluene				
83	122667	1,2-diphenylhydrazine*				
84	959988	endosulfan I*				
85	33213659	endosulfan II*				
86	1031078	endosulfan sulfate				
87	72208	endrin				
88	7421934	endrin aldehyde				
89	100414	ethylbenzene				
90	206440	fluoranthene				
91	86737	fluorene*				
92	76448	heptachlor				
93	1024573	heptachlor epoxide				
94	118741	hexachlorobenzene*				
95	87683	hexachlorobutadiene				
96	77474	hexachlorocyclopentadiene*				
97	67721	hexachloroethane*				



Item No.	CASRN	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
98	193395	indeno (1,2,3-cd)pyrene*				
99	78591	isophorone*				
100	74873	methylene chloride*				
101	91203	naphthalene				
102	98953	nitrobenzene				
103	88755	2-nitrophenol*				
104	100027	4-nitrophenol*				
105	62759	n-nitrosodimethylamine*				
106	621647	n-nitrosodipropylamine*				
107	86306	n-nitrosodiphenylamine*				
108	12674112	PCB-1016*				
109	11104282	PCB-1221*				
110	11141165	PCB-1232*				
111	53469219	PCB-1242*				
112	12672296	PCB-1248*				
113	11097691	PCB-1254*				
114	11096825	PCB-1260*				
115	87865	pentachlorophenol				
116	85018	phenanthrene				
117	108952	phenol				
118	129000	pyrene				
119	1746016	2,3,7,8-tetrachlorodibenzo-p-dioxin*				
120	630206	1,1,2,2-tetrachloroethane*				
121	127184	tetrachloroethene*				
122	108883	toluene*				
123	8001352	toxaphene				
124	120821	1,2,4-trichlorobenzene				
125	71556	1,1,1-trichloroethane*				
126	79005	1,1,2-trichloroethane*				
127	79016	trichloroethene*				
128	75694	trichlorofluoromethane*				
129	88062	2,4,6-trichlorophenol				
130	75014	vinyl chloride*				

2. For chemical compounds listed above that are indicated to be known present, please list and provide the following data for each:  
(attach additional sheets if needed)

Item No.	Chemical Compound	Estimated Annual Usage (lb)	Loss or Discharge to Sewers (lb/yr)	
			Sanitary	Storm

Attachment A (Continued)  
PRIORITY POLLUTANT SYNONYM LISTING

<u>CHEMICAL COMPOUND</u>	<u>SYNONYM</u>
benzo(a)anthracene	1,2-benzanthracene 2,3-benzphenanthrene
benzo(a)pyrene	3,4-benzopyrene
benzo(g,h,i)perylene	1,12-benzoperylene
benzo(k)fluoroanthene	11,12-benzofluoroanthene
g-BHC(gamma)	lindane
bis(2-chloroethyl)ether	2,2-dichloroethyl ether
bis(2-chloroethoxy)methane	2,2-dichloroethoxy methane
bis(2-chloroisopropyl)ether	2,2-dichloroisopropyl ether
bis(chlormethyl)ether	(sym)dichloromethyl ether
bis(2-ethylhexyl)phthalate	2,2-diethylhexyl phthalate
bromodichloromethane	dichlorobromomethane
bromoform	tribromomethane
bromomethane	methyl bromide
carbon tetrachloride	tetrachloromethane
4-chloro-3-methylphenol	para-chloro-meta-cresol
chloroethane	ethylchloride
chloroform	trichloromethane
chloromethane	methyl chloride
2-chlorophenol	para-chlorophenol
chrysene	1,2-benzphenanthrene
4,4-DDD	dichlorodiphenyldichloroethane p,p-TDE
4,4-DDE	tetrachlorodiphenylethane dichlorodiphenyltrichloroethylene
4,4-DDT	p,p-DDX
dibenzo(a,h)anthracene	dichlorodiphenyldichloroethane
dibromochloromethane	1,2,5,6-dibenzanthracene
1,2-dichlorobenzene	chlorodibromomethane
1,3-dichlorobenzene	ortho-dichlorobenzene
1,4 dichlorobenzene	meta-dichlorobenzene
dichlorodifluoromethane	para-dichlorobenzene
1,1-dichloroethane	difluorodichloromethane
1,2-dichloroethane	fluorocarbon-12
1,1-dichloroethene	ethylidene chloride
chloroethylene	ethylene chloride
(trans)-1,2-dichloroethene	ethylene dichloride
1,2-dichloropropane	1,1-dichloroethylene
(cis & trans)1,3-dichloropropene	acetylene dichloride
diethyl phthalate	1,2(trans)-dichloroethylene
2,4-dimethylphenol	propylene dichloride
di-n-octyl phthalate	(cis & trans)1,3-dichloropropylene
4,6-dinitro-2-methylphenol	ethyl phthalate
1,2-diphenylhydrazine	2,4-xlenol
endosulfan I	di-(2-ethylhexyl)phthalate
endosulfan II	4,6-dinitro-ortho-cresol
fluorene	hydrazobenzene
hexachlorobenzene	a-endosulfan-alpha
hexachlorocyclopentadiene	b-endosulfan-beta
hexachloroethane	(alpha)-diphenylene methane
indeno(1,3,3-cd)pyrene	perchlorobenzene
isophorone	perchlorocyclopentadiene
methylene chloride	perchloroethane
2-nitrophenol	2,3-ortho-phenylene pyrene
4-nitrophenol	3,5,5-trimethyl-2-cyclohexen-1-one
N-nitrosodimethylamine	dichloromethane
N-nitrosodipropylamine	para-nitrophenol
N-nitrosodiphenylamine	ortho-nitrophenol
	dimethyl-nitrosoamine
	N-nitroso-di-n-propylamine
	diphenyl-nitrosoamine

Attachment A (Continued)  
PRIORITY POLLUTANT SYNONYM LISTING

<u>CHEMICAL COMPOUND</u>	<u>SYNONYM</u>
PCB-1016	Arochlor-1016
PCB-1221	Arochlor-1221
PCB-1232	Arochlor-1232
PCB-1242	Arochlor-1242
PCB-1248	Arochlor-1248
PCB-1254	Arochlor-1254
PCB-1260	Arochlor-1260
2,3,7,8-tetrachlorodibenzo-p-dioxin	TCDD
1,1,2-tetrachlorethane	acetylene tetrachloride
tetrachloroethene	perchloroethylene
	tetrachloroethylene
toluene	methylbenzene
	toluol
1,1,1-trichloroethane	methyl chloroform
1,1,2-trichloroethane	vinyl trichloride
trichloroethene	trichloroethylene
trichlorofluoromethane	fluorocarbon-11
	fluorotrichloromethane
vinyl chloride	chloroethene

Attachment B  
ELECTROPLATING AND METAL FINISHING SUBCATEGORIES

Place a check beside all activities that apply to your business.

Item No.

- ☐ Electroplating
- ☐ Electroless plating
- ☐ Anodizing
- ☐ Conversion coating
- ☐ Etching (chemical milling)
- ☐ Printed circuit board manufacturing
- ☐ Cleaning
- ☐ Machining
- ☐ Grinding
- ☐ Polishing
- ☐ Barrel finishing (tumbling)
- ☐ Burnishing
- ☐ Impact deformation
- ☐ Pressure deformation
- ☐ Shearing
- ☐ Heat treating
- ☐ Thermal cutting
- ☐ Welding
- ☐ Brazing
- ☐ Soldering
- ☐ Flame spraying
- ☐ Sand blasting
- ☐ Other abrasive jet machining
- ☐ Electric discharge machining
- ☐ Electrochemical machining
- ☐ Electron beam machining
- ☐ Laser beam machining
- ☐ Plasma arc machining
- ☐ Ultrasonic machining
- ☐ Sintering
- ☐ Laminating
- ☐ Hot dip coating
- ☐ Sputtering
- ☐ Vapor plating
- ☐ Thermal infusion
- ☐ Salt bath descaling
- ☐ Solvent degreasing
- ☐ Paint stripping
- ☐ Painting
- ☐ Electrostatic painting
- ☐ Electropainting
- ☐ Vacuum metalizing
- ☐ Assembly
- ☐ Calibration
- ☐ Testing
- ☐ Mechanical plating

Attachment C  
METAL FINISHING SUBCATEGORIES

Place a check beside all activities that apply to your business.

- ☐ Electroplating
- ☐ Electroless plating
- ☐ Anodizing
- ☐ Conversion coating
- ☐ Etching (chemical milling)
- ☐ Printed circuit board manufacturing
- ☐ Cleaning
- ☐ Machining
- ☐ Grinding
- ☐ Polishing
- ☐ Barrel finishing (tumbling)
- ☐ Burnishing
- ☐ Impact deformation
- ☐ Pressure deformation
- ☐ Shearing
- ☐ Heat treating
- ☐ Thermal cutting
- ☐ Welding
- ☐ Brazing
- ☐ Soldering
- ☐ Flame spraying
- ☐ Sand blasting
- ☐ Other abrasive jet machining
- ☐ Electric discharge machining
- ☐ Electrochemical machining
- ☐ Electron beam machining
- ☐ Laser beam machining
- ☐ Plasma arc machining
- ☐ Ultrasonic machining
- ☐ Sintering
- ☐ Laminating
- ☐ Hot dip coating
- ☐ Sputtering
- ☐ Vapor plating
- ☐ Thermal Infusion
- ☐ Salt bath descaling
- ☐ Solvent degreasing
- ☐ Paint stripping
- ☐ Painting
- ☐ Electrostatic painting
- ☐ Electropainting
- ☐ Vacuum metalizing
- ☐ Assembly
- ☐ Calibration
- ☐ Testing
- ☐ Mechanical plating

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## EXHIBIT E PERMIT APPLICATION

### INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION

#### General Instructions

This form serves as a basis for Industrial Wastewater Discharge Permit Issuance. The City will be verifying data contained in the returned form through phone calls and site visits. Please take the time to fill out the form thoroughly and adequately. Enclosed are copies of the environmental survey submitted for your reference. All questions should be answered. (Process wastewater also includes such items as spent solvents and chemicals dumped down floor drains and sinks.)

Section I	Water/Wastewater Data: completed by all users discharging or preparing to discharge process wastewater.
Section II	Plant/Process Data/Wastewater Treatment: completed by all users discharging or proposing to discharge process wastewater. (See <u>categorical user</u> discussion below.)
Section III	Wastewater Characteristic/sampling data: to be completed by <u>all industrial users</u> .
Attachment A	Process Schematic flow form.
Attachment B	Building Layout form.

Sections I, II, and III, contain specific instructions and examples to help you answer the questions. The instructions are located on the backside of the pages.

#### New Facilities Proposing to Discharge Wastewater:

Please supply as much information as possible providing best estimates. Section I requires that a date for commencement of operations and discharge be provided.



## Instructions

### General Information

#### Note:

Information must be typewritten or clearly printed. Attach additional sheets keyed to section and item number if needed to provide complete information. Signing official must have authorization to provide such information on behalf of the company, corporation, or partnership (see 40 CFR 403.12). Please complete a form for each facility that discharges to the City sanitary sewer system. Additional copies can be obtained by photocopying or by contacting the City. The address and phone number are provided below.

Please forward the completed form to the address shown below. If you have further questions, contact the City at 397-2344.

City of St. Helens  
Plant operations/pretreatment supervisor  
P.O. Box 278  
St. Helens, OR 97051

1. Enter the name or title of your business.
2. Enter facility address where discharge occurs, if different than No. 2.
3. Give the name of the person who is thoroughly familiar with the facts reported on this form and who can be contacted by the City staff.

Confidentiality: In accordance with Title 40 of the Code of Federal Regulations Part 403.14, information and data provided in this questionnaire, which identifies the nature and frequency of discharge, shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit be required for your facility, the information in this questionnaire will be used to issue the permit.

The Authorized Representative may be either a corporate official, a partner, a fiduciary, or other duly authorized representative if this person is responsible for the overall operation of the facility from which the discharge originates.



## INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION

Leave Blank: City use only

Date Received: \_\_\_\_\_

### GENERAL INFORMATION

Complete all applicable sections. Information must be typewritten or clearly printed. Attach requested information as needed. Signing official must have authorization to provide such information on behalf of the company, corporation, or partnership. See 40 CFR 403.12(l)

1. Company Name/Telephone number: \_\_\_\_\_  
A. Division name: (if applicable) \_\_\_\_\_
2. Mailing Address: A. Street or P.O. Box \_\_\_\_\_  
B. City, State, Zip Code \_\_\_\_\_
3. Facility Address: (if different from mailing address)  
A. Street or P.O. Box \_\_\_\_\_  
B. City, State, Zip Code \_\_\_\_\_
4. Person to be contacted about this form:  
A. Name: \_\_\_\_\_  
B. Address: \_\_\_\_\_  
C. City, State, Zip Code: \_\_\_\_\_  
D. Title: \_\_\_\_\_  
E. Phone Number: \_\_\_\_\_
5. Person to be contacted in case of an emergency:  
A. Name: \_\_\_\_\_  
B. Address: \_\_\_\_\_  
C. City, State, Zip Code: \_\_\_\_\_  
D. Title: \_\_\_\_\_  
E. Phone Number: \_\_\_\_\_

### Confidentiality

Please indicate those sections of this questionnaire that you wish to remain confidential and your basis for requiring confidentiality. (Wastewater characteristics cannot be confidential.)

### Authorized Representative Statement

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.

\_\_\_\_\_  
Name (print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Phone

## Instructions

### Section I--Water/Wastewater Data

#### PROVIDE CALCULATIONS TO SUPPORT ALL FIGURES IN SECTION I.

1. Water Use and Distribution--Provide the daily average flows of water received and wastewater discharged in gallons per day for the last 12 months by dividing the total flows by the number of days that a discharge of water occurred (or operating day). For the water that is received from other than City Water services or discharged to other than City sewers, enter the location in the column headed "Source" or "Discharge To." Other source locations can include wells and rivers. Other discharge locations can include dry wells and receiving streams. Hourly and daily water supply meter readings may be used, provided the filling and discharge of storage tanks, process vats, etc., are taken into consideration.
  - ☐ For estimating sanitary flow, use 35 gallons for each employee.
  - ☐ Categorical users: Complete item 7 for providing flows for each of the regulated processes (process lines).
3. Discharge Period:
  - (a) Enter the hours of the day for each day, during which waste from this Business Activity will be discharged to the sewer: e.g., from 6 a.m. to 5 p.m.
  - (b) Enter the time duration of discharge other than continuous flows (15 minutes every hour).
4. Variation in Operation:

Indicate whether the business activity is continuous throughout the year or if it is seasonal. If the activity is seasonal, circle the months of the year during which discharge occurs. Make any comments you feel are required to describe the variation in operation of your business activity.

## Section I--Water/Wastewater Data

1. Water use and distribution--Estimate the average quantity of water received and wastewater discharged daily (for new businesses, estimate flows).

	Supply From (gal/day)		Discharged To (gal/day)			
	Water District	Other Source	Comm. Sewer	Storm	Evaporation	Other
Water Used for:						
Sanitary						
Processes (categorical users see No. 7 )						
Boiler/Cooling Tower						
Cooling Water Contact						
Washing (equipment washdown)						
Irrigation						
Air Pollution Control						
Surface Water						
Water Hauler						
Other						
(Describe)						
Total:						

2. If batch discharge occurs or will occur, indicate:

- (a) Percent processing as batch \_\_\_\_\_
- (b) Percent processing as continuous \_\_\_\_\_
- (c) Number of batch discharges \_\_\_\_\_ at \_\_\_\_\_  
(days of week) (hours of day)
- (e) Average quantity per batch \_\_\_\_\_ gallons
- (f) Flow rate \_\_\_\_\_ gallons/minute

3. Discharge Period

- (a) Hours of Day Operated or planned:

M \_\_\_\_\_ T \_\_\_\_\_ W \_\_\_\_\_ Th \_\_\_\_\_ F \_\_\_\_\_ Sat \_\_\_\_\_ Sun \_\_\_\_\_

- (b) Time Duration of Discharge or planned:

M \_\_\_\_\_ T \_\_\_\_\_ W \_\_\_\_\_ Th \_\_\_\_\_ F \_\_\_\_\_ Sat \_\_\_\_\_ Sun \_\_\_\_\_

4. Variation of Operation

Is the business or proposed activity:

Continuous through the year [ ]

Seasonal [ ]--Circle the months of the year during which discharge occurs:

J F M A M J J A S O N D

### Instructions

5. Process flow schematic: draw appropriate diagram(s) using the form in Attachment A.

Go to Attachment A for form, instructions, and examples.

Building layout: Draw layout of building using Attachment B.

Go to Attachment B for form, instructions, and examples.

Section I--Waste/Wastewater Data (continued)

5. List existing or proposed plant sewer outlets, size, and flow (provide as-builts assign sequential reference number to each sewer starting with No. 1, see Attachment A and B).

Reference No.	Sewer Size (inches)	Descriptive location of sewer connection or discharge point	Daily Avg. flow (gal/day)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

6. General characteristic of wastewater or proposed wastewater discharge: (provide specific values for a., b., d., e., and f. if known)

- (a) Temperature: \_\_\_\_\_ F  
 (b) pH range: \_\_\_\_\_  
 (c) Flammable or explosive materials: Yes ☐ No ☐ Flashpoint \_\_\_\_\_ C  
 (d) Fats, oils, and grease (mg/L): \_\_\_\_\_  
 (e) BOD (mg/L): \_\_\_\_\_  
 (f) TSS (mg/L): \_\_\_\_\_  
 (g) Solid or viscous material: Yes ☐ No ☐ Describe \_\_\_\_\_  
 (h) Priority Pollutants: Yes ☐ No ☐ Don't know ☐ \*\*\* SEE ATTACHMENT "A" OF COMPLETED ENVIRONMENTAL SURVEY FORM  
 (i) Solvents: Yes ☐ No ☐ Don't know ☐

7. For categorical facilities, provide the following flows for each of your regulated processes or proposed regulated process (i.e., manufacturing process line covered by categorical pretreatment standards).

- (a) Total Plant Flow in gallons per day (gpd) discharged to the sewer system:

Average \_\_\_\_\_ Maximum \_\_\_\_\_

- (b) Individual Process Flows (gpd)

No.	EPA Categorical No.	Regulated Process	Average flow rate (gpd)	Maximum flow rate (gpd)	Type of Discharge (batch, continuous, none)
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

8. Is an inspection and sampling manhole structure available on your discharge pipe? Yes ☐ No ☐

- If yes, provide location below and indicate on the as-built.
- Location description: \_\_\_\_\_
- If no, is one planned? Yes ☐ No ☐

9. Do you have automatic sampling equipment or continuous wastewater flow metering equipment currently in use or included in future plans?

Current: Flow Metering	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Sampling Equipment	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Planned: Flow Metering	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Sampling Equipment	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

## Instructions

### Section II--Business/Facility Description

1. Business Activity--Describe the principal activity on the premises. For the purpose of completing this Part, an activity is a major class of manufacturing. Enter the Standard Industrial Classification (SIC) Code Number, as found in the 1972 Edition of Standard Industrial Classification Manual prepared by the Executive Office of the President, Office of Management and Budget, which is available from the Government Printing Office at Washington, D.C., or at San Francisco, California. DO NOT USE PREVIOUS EDITIONS OF THE MANUAL. Copies are also available for examination at most public libraries. If you do not know, leave SIC No. blank.
  - (a) & (b) If not already provided in Attachment C of Section B, Environmental Survey, list all primary raw materials and chemicals used in the facility's operations. Avoid use of trade names of chemicals. If trade names are used, provide information regarding the active ingredients.
  - (c) Product--List the types of products, giving the common or brand name and the proper or scientific name. Enter from your records the average and maximum amounts produced daily for the activity for the previous calendar year, and the estimated daily production for this calendar year. Attach additional pages if necessary.
  - (d) Description--Describe the wastewater generating process occurring on the premises, including any seasonal variation in wastewater discharge volumes, plant operations, raw materials, and chemicals used in process and/or production.
  - (e) Substances discharged--Give common (brand names) and technical names (chemical, scientific or proper names) of each raw material and product that may be discharged to the sewer. Briefly describe the physical, (e.g., color) and chemical, (e.g., reacts with water) properties of each substance.

## Section II-Business/Facility Description

PURPOSE--The business description is primarily used to determine the substances which may enter into the wastewater discharge from the business activity. Give detailed descriptions.

1. Business activity--(Complete a separate sheet for each major or proposed business activity or product line on premises.)

Activity: \_\_\_\_\_ SIC Nos.: \_\_\_\_\_

(a) Raw materials used or planned for use:

(b) Chemicals used or planned for use:

(c) Product (new businesses: provide best estimates):

Type of Product (Brand Names)	Past Calendar Year		Estimate This Calendar Year	
	Amounts Per Day (Daily Units)		Amounts Per Day (Daily Units)	
	Average	Maximum	Average	Maximum

(d) Description--Describe each wastewater generating or proposed operations or manufacturing process. Indicate variations in production and operations during the year. (Use additional sheets as necessary.)

(e) Substances Discharged--Give common and technical names of each major raw material and product that may be discharged to the sewer. Briefly describe the physical and chemical properties of each substance and products. (use additional sheets if necessary.)

NAME

DESCRIPTION

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Instructions for Completing Sections III through V

The remaining three sections will facilitate the collection of the necessary quantitative wastewater information to assist the City in establishing applicable pretreatment limits and requirements. Existing NONCATEGORICAL FACILITIES are required to complete Section III.

#### Section III--Wastewater Characterization

Section III is to be completed by noncategorical type facilities.

---

#### Note:

New Facilities (categorical and noncategorical: new businesses moving into existing facilities and new business proposing to construct a new building)

Because no discharge of process wastewaters has occurred, Sections III and IV cannot be completed.

Contact the City if there are any questions on what limits apply to the discharge, what pollutants to sample, sampling requirements, and where to take samples. The general instructions on the back of the form provide general information on sampling.

#### Instructions

#### Section III--Wastewater Characterization

To be completed by all industrial users discharging or proposing to discharge process wastewater. (existing and new facilities that have not begun to operate and/or discharge). Attach additional sheets if needed. Contact the City before sampling, if not sure of pretreatment standards, sampling protocols.

1(a) Pollutants--List across the top specific pollutants (use abbreviations) regulated in the City code. Example: Copper - Cu.

☐ Monthly Average - Refer to the City code for pretreatment standards for the specific pollutant. Monthly averages shall be reported.

Example: Monthly average (Copper - Cu = 2 mg/L)  
Monthly average (Zinc - Zn = 4 mg/L)

You would enter 2 under Cu and 4 under Zn.

☐ Reported average: Average all the individual results and report the average in the spaces provided for each of the appropriate pollutants listed.

☐ Indicate type of samples (i.e., grab, flow proportioned composite, etc.), analytical methods, and number of samples taken. The industrial user must ascertain whether it can meet the pollutant standards. The type of discharge, i.e., batch, continuous, routine historical information (e.g., existing data pollutant discharge) etc., is a factor that should guide the industrial user regarding the number of samples to be taken to ascertain compliance. Additionally, the time, date of sampling, and methods of analysis must be reported. Analytical methods must be performed in accordance with 40 CFR Part 136 and any amendments thereto. It is important that the samples be representative and taken during full production.

Each daily composite shall be analyzed separately.



### Section III--Wastewater Characterization

Note: Samples should be taken of the final effluent prior to discharge to the City's collection system. If there is more than one discharge of process wastewater to the City's sewer system, photocopy this page and supply the analytical results for multiple discharges.

1. For all industrial users (report results in concentrations (mg/L) or mass (lbs)) If a new source and not yet in production provide estimates.
  - (a) Each industrial user will sample, have analyzed, and report on all pollutants as specified by the City. where mass limits apply, the facility must report results on a mass limit basis (concentration  $\times$  regulated process flow = mass). Attach all calculations.

Samples collected must be representative and taken during peak production and peak cleaning or highest strength periods. Three 24-hour composite samples must be collected and analyzed separately for each pollutant unless otherwise noted. Further instructions are provided on the back.

#### ANALYTICAL RESULTS OF PROCESS WASTEWATER DISCHARGES

Pollutant										
Units										
Monthly Avg. Limit										
Reported Average										

1. Specify units used (mg/L or lb): \_\_\_\_\_
2. Sample type (grab, composite) \_\_\_\_\_
3. Number of samples collected (explain): \_\_\_\_\_
4. Dates and times samples collected: \_\_\_\_\_
5. Sample collection location: \_\_\_\_\_
6. Where samples analyzed: \_\_\_\_\_
7. Methods of analyses: \_\_\_\_\_
8. Flash point test: \_\_\_\_\_
9. Provide name and address of commercial labs that are performing analysis:
 

Name: \_\_\_\_\_ Address: \_\_\_\_\_  
 Name: \_\_\_\_\_ Address: \_\_\_\_\_

NOTE: The City may require that a Professional Engineer perform a treatability study, which will be submitted with the application.

Instructions

Section III--Wastewater Characterization (continued)

1(b) Compare the sample results against pretreatment standards provided by the City (contained in City Ordinance).

- ☐ Describe any additional O&M pretreatment and provide compliance schedule. Specify the major events needed to achieve compliance, as well as the dates for completion of each event (i.e., hiring an engineer, completing preliminary plans, completing final plans, executing contracts, commencing construction, completing construction, etc.). The shortest possible schedule should be provided.

The Qualified Certification pertains to the actual preparer of the report if different from the authorized representative.

The Authorized Representative may be either a corporate official, a partner, a fiduciary, or other duly authorized representative if this person is responsible for the overall operation of the facility from which the discharge originates. See 40 CFR 403.12(l)

Section III--Wastewater Characterization (continued)

Authorized Representative Statement

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.

\_\_\_\_\_  
Name (print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Phone

## Instructions

### PROCESS FLOW SCHEMATIC

Separate drawing should be completed for each major business activity.

A line drawing (schematic flow diagram) of each major business activity is to be completed in the space below or drawn on an attached sheet of paper (all sheets should be letter size). Number each process which generates wastewater using the same numbering as in the building layout or plant site plan shown in the building layout schematic. An example of drawing required is shown below in Figure 1.

To determine your average daily volume and maximum daily volume of wastewater flow, you may have to read water meters, sewer meters, or make estimates of volumes that are not directly measurable.

#### ATTACHMENT A-SCHEMATIC FLOW DIAGRAM

For each major activity in which wastewater is generated, draw a diagram of the flow of materials and water from start to completed activity, showing all unit processes generating wastewater. Number each unit process having wastewater discharges to the community sewer. Use these numbers when showing this unit process in the building layout in schematic. Use the space below or additional sheets of 8x11 paper. An example is provided on the backside.

##### Instructions

See example:

#### ATTACHMENT B-BUILDING LAYOUT

Draw to scale the location of each building on the premises. Show location of all water meters (current and planned, storm drains, numbered unit processes (from process schematic(s)), community sewers and each side sewer connected to the community sewers, automatic sampling equipment (current and planned), location of pretreatment processes, treated flows and untreated flows, name and location of pertinent streets. Use flow schematic to indicate process and process discharge in gpd. Number each side sewer and show possible sampling locations (sampling manhole).

An attached blueprint or drawing of the facilities showing the above items may be substituted for a drawing on this sheet. See example on the back.

## EXHIBIT F PERMIT FACT SHEET



### 1. Brief description of industrial user:

BUSINESS NAME: \_\_\_\_\_

Address: \_\_\_\_\_

Actual Location of Facility if Different Than Address Above: \_\_\_\_\_

Contact Information:

1.) Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_ Position: \_\_\_\_\_

2.) Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_ Position: \_\_\_\_\_

Authorized Signatory Official: \_\_\_\_\_ Date: \_\_\_\_\_

Type of Operation(S) in which the Facility is Engaged (E.G., Manufacture Of Battery Terminals)

\_\_\_\_\_

Brief Description of the Plant Processes or Other Sources of Generated Wastewater:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Categorical Determination: \_\_\_\_\_

\_\_\_\_\_

### 2. Type and quantity of the discharge

Rate or Frequency of the Discharge: \_\_\_\_\_

Average Flow: \_\_\_\_\_ Daily Maximum Flow: \_\_\_\_\_

Daily Maximum and Monthly Average Discharge of any Pollutants Present in Significant Quantities or Subject to Limitations or Prohibition:

\_\_\_\_\_  
\_\_\_\_\_

### 3. Basis for the permit limits including,

Permit Application Documents (Attach a Copy of the Page Referred to With Highlighted Section)

Any Permit Modifications? (If So, Why And When).

Compliance History Status (If Applicable)

Accidental Spill Prevention Slug Control Plan

Required? Yes \_\_\_\_ No \_\_\_\_

Approved Yes \_\_\_\_\_ Date \_\_\_\_\_ No \_\_\_\_ Why \_\_\_\_\_

If no Plan Required, are “Other Actions” Required in Place of ASP/SCP? Yes: \_\_\_\_ No: \_\_\_\_

Analytical Data For Pollutants (provided in both a complete and summary form so that they can be easily reviewed and verified.)

Copies of or Citations to Federal, State, and Local Limits Regulations

Copies of Literature Information Where They Were Used to Develop Permit Limits

Plant Layouts and Process Wastewater Flow Diagrams

4. Give a detailed discussion of any special conditions in the permit and the rational for pollutant selection and limits development.

5. Calculations showing the actual numbers used to derive each limit, including:

Combined Wastestream Formula or Flow Weighted Average Calculations

Equivalent Mass or Concentration-Based Limits Calculations

Local Limits Allocation Basis (BMPs In Lieu)

Most Stringent Limit Imposed (show comparison of potential limits)

## EXHIBIT G PERMIT ISSUANCE LETTER

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

RE: Issuance of Industrial User Permit to \_\_\_\_\_ by \_\_\_\_\_  
the \_\_\_\_\_  
Permit No. \_\_\_\_\_

Dear \_\_\_\_\_

Your application for an industrial user pretreatment permit has been reviewed and processed in accordance with \_\_\_\_\_

The enclosed \_\_\_\_\_ covers the wastewater discharged from \_\_\_\_\_  
the facility located at \_\_\_\_\_ into the City of St.  
Helens sewer system. All discharges from this facility and actions and reports relating thereto shall be in  
accordance with the terms and conditions of this permit.

If you wish to appeal or challenge any conditions imposed in this permit, a petition shall be filed for modification or  
reissuance of this permit in accordance with the requirement of \_\_\_\_\_ within 30 days of your receipt of this  
correspondence. Pursuant to \_\_\_\_\_ failure to petition for reconsideration of the  
permit within the allotted time is deemed a waiver by the permittee of his right to challenge the terms of this permit.

By: \_\_\_\_\_  
City of St. Helens

Issued this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

(This page intentionally left blank)



**EXHIBIT H INDUSTRIAL DISCHARGE PERMIT EXAMPLE**  
**COVER PAGE**

Permit No.

INDUSTRIAL USER PERMIT

In accordance with the provisions of

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of St. Helens sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, state, and federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of St. Helens sewer use ordinance, Ordinance No. .

This permit shall become effective on \_\_\_\_\_ and shall expire at midnight on \_\_\_\_\_

[Official Seal of Control Authority]

By: \_\_\_\_\_  
Superintendent

Issued this     day of     , 19

## PART 1 – EFFLUENT LIMITATIONS

- A. During the period of \_\_\_\_\_ to \_\_\_\_\_ the permittee is authorized to discharge process wastewater to the City of St. Helens sewer system from the outfalls listed below.

Description of outfalls:

<u>Outfall</u>	<u>Descriptions</u>
----------------	---------------------

- B. During the period of \_\_\_\_\_ to \_\_\_\_\_ the discharge from outfall \_\_\_\_\_ shall not exceed the following effluent limitations. Effluent from this outfall consists of the most stringent of all applicable categorical and/or local limits as listed below:

Classification of Categorical/Sub-Categorical Standard that applies: \_\_\_\_\_

Classification as New/Existing \_\_\_\_\_

Applicable limits are based on the application of CWF and/or FWA and/or Categorical Standard Variance.

### EFFLUENT LIMITATIONS

<u>Parameter</u>	Daily maximum (mg/l)	Monthly average (mg/l)
------------------	----------------------	------------------------

## PART 2 – MONITORING REQUIREMENTS

Sample	Measurement
<u>Parameter (units)</u>	<u>Outfall</u> <u>Frequency</u> <u>Sample Type</u>

TTO (Total Toxic Organic) Requirements Applicable Yes \_\_\_\_ No \_\_\_\_

TOMP (Toxic Organic Management Plan) Received Yes \_\_\_\_ Date \_\_\_\_ No \_\_\_\_

All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

## PART 3 - REPORTING REQUIREMENTS

### A. Monitoring Reports

Monitoring results obtained shall be summarized and reported on a form worked out with the industrial user and approved by the City once per month. The reports are due on the \_\_\_\_\_ day of each month. The first report is due on \_\_\_\_\_. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed during the calendar month preceding the submission of each report including measured maximum and average daily flows.

- B. If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and results shall be reported in the monthly report submitted to the City of St. Helens. Such increased monitoring frequency shall also be indicated in the monthly report.

### C. Automatic Resampling

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the City of St. Helens of the violation within 24 hours; and
2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days of becoming aware of the violation.

### D. Accidental Discharge Report

1. The permittee shall notify the City of St. Helens\* immediately upon the occurrence of any accidental discharge of substances prohibited by City ordinance or any slug loads or spills that may enter the public sewer which has the potential to disrupt the City of St. Helens sewer treatment process and or endanger the health and safety of City employees.
2. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, state, or federal laws.

\*Wastewater treatment plant 397-2344, after hours (503) 366-3104.

Within five days following an accidental discharge, the permittee shall submit to the City of St. Helens a detailed written report. The report shall specify:

- a. Description and cause of the upset, slug load of accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.
- b. Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.
- c. All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

- E. All reports required by this permit shall be submitted to the City of St. Helens at the following address:

Attn: Plant operations/pretreatment supervisor  
Address: PO Box 278  
St. Helens, OR 97051

PART 4 - SPECIAL CONDITIONS  
SECTION 1 - ADDITIONAL/SPECIAL MONITORING REQUIREMENTS

SECTION 2 - REOPENER CLAUSE

- A. This permit may be reopened and modified to incorporate any new or revised requirements contained in a National categorical pretreatment standard.
- B. This permit may be reopened and modified to incorporate any new or revised requirements resulting from the City of St. Helens reevaluation of its local limit
- C. This permit may be reopened and modified to incorporate any new or revised requirements developed by the City of St. Helens as are necessary to ensure POTW compliance with applicable sludge management requirements promulgated by EPA (40 CFR 503).

SECTION 3 - COMPLIANCE SCHEDULE

- A. The permittee shall accomplish the following tasks in the designated time period:
- B. Compliance Schedule Reporting

No later than 14 days following each date in the above schedule, the permittee shall submit to the City of St. Helens a report including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with the increment of progress, the reasons for delay, and the steps being taken to return the project to the schedule established.

PART 5 - STANDARD CONDITIONS  
STANDARD CONDITIONS FOR PERMITS

DEFINITIONS

1. Definitions

- a. Daily Maximum - The maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- b. Composite Sample. The sample resulting from the combination of individual wastewater samples taken at selected intervals based on either an increment of flow or time.
- c. Grab Sample. A sample which is taken from a waste stream on a one-time basis without regard to the flow in the waste stream and without consideration of time.
- d. Instantaneous Maximum Concentration - The maximum concentration allowed in any single grab sample.
- e. Cooling Water -
  - (1) Uncontaminated: Water used for cooling purposes only which has no direct contact with any raw material, intermediate, or final product and which does not contain a level of contaminants detectably higher than that of the intake water.

- (2) Contaminated: Water used for cooling purposes only which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides, or by direct contact with process materials and/or wastewater.
- f. Monthly Average - The arithmetic mean of the values for effluent samples collected during a calendar month or specified 30-day period (as opposed to a rolling 30-day window).
- g. Weekly Average - The arithmetic mean of the values of effluent samples collected over a period of seven consecutive days.
- h. Bi-Weekly - Once every other week.
- i. Bi-Monthly - Once every other month.
- j. Upset - Means an exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards because of factors beyond the reasonable control of the industrial user. An Upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless, or improper operation.
- k. Bypass - Means the intentional diversion of waste streams from any portion of an Industrial User's treatment facility.

## B. GENERAL CONDITIONS

### 1. Severability

If any provision(s) of sewer use ordinance 2746 is (are) invalidated by any court of competent jurisdiction, the remaining provisions shall not be affected and shall continue in full force and effect.

### 2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

### 3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

### 4. Permit Modification

This permit may be modified for good causes including, but not limited to, the following:

- a. To incorporate any new or revised federal, state, or local pretreatment standards or requirements.
- b. To address significant alterations or additions to the industrial user's operation, processes, or wastewater volume or character since the time of permit issuance.
- c. A change in the municipal wastewater system that requires either a temporary or permanent reduction or elimination of the authorized discharge.
- d. Information indicating that the permitted discharge poses a threat to the city's municipal wastewater system, city personnel, or the receiving waters.
- e. Violation of any terms or conditions of the wastewater permit.

- f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting.
- g. Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13.
- h. To correct typographical or other errors in the permit.
- i. To reflect a transfer of the facility ownership and/or operation to a new owner/operator.

The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

5. **Permit Termination** See Sewer Use Ordinance (City Municipal Code (SHMC) Title 13, Chapter 16, for complete list

This permit may be terminated for the following reasons:

- a. Falsifying self-monitoring reports
- b. Tampering with monitoring equipment
- c. Refusing to allow timely access to the facility premises and records
- d. Failure to meet effluent limitations
- e. Failure to pay fines
- f. Failure to pay sewer charges
- g. Failure to meet compliance schedules.

6. **Permit Appeals**

Any person, including the industrial user, may petition to the City to reconsider the terms of the permit within thirty (30) days of the issuance of the final permit.

- a. Failure to submit a timely petition for review shall be deemed to be a waiver of the administrative appeal.
- b. In its petition, the appealing party must indicate the permit provisions objected to, the reasons for this objection, and the alternative conditions, if any, it seeks to place in the permit.
- c. The effectiveness of the permit shall not be stayed pending the appeal.
- d. If the City fails to act within thirty (30) days, a request for reconsideration shall be deemed to be denied. Decisions not to reconsider a permit, not to issue a permit, or not to modify a permit shall be considered final administrative action for purposes of judicial review.
- e. Aggrieved parties may seek judicial review of the final administrative permit decision.

7. **Property Rights**

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of federal, state, or locals laws or regulations.

8. **Limitation on Permit Transfer**

Permits may be reassigned or transferred to a new owner and/or operator with prior approval of the City:

- a. The permittee must give at least thirty (30) days advance notice to the City, and provide the new owner with a copy of the existing permit.
- b. The notice must include a written certification by the new owner which:
  - (1) States that the new owner has no immediate intent to change the facility's operations and processes
  - (2) Identifies the specific date on which the transfer is to occur
  - (3) Acknowledges full responsibility for complying with the existing permit.

#### 9. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

- a. The permittee has submitted a complete permit application at least ninety (90) days prior to the expiration date of the user's existing permit.
- b. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

#### 10. Dilution

The permittee shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

#### 11. General Prohibitive Standards

The permittee shall comply with all the general prohibitive discharge standards in City of St. Helens Sewer Use Ordinance Municipal Code (SHMC) Title 13, Chapter 16. Namely, the industrial user shall not discharge wastewater to the sewer system:

No user shall contribute or cause to be contributed, directly or indirectly, any pollutant or wastewater which will cause interference or pass through. These general prohibitions apply to all users of the municipal wastewater system whether or not the user is subject to categorical pretreatment standards or any other national, state or local pretreatment standards or requirements. Furthermore, no user may contribute the following substances to the system:

- a. Any liquids, solids, or gases which by reason of their nature or quantity are, or may be, sufficient, either alone or by interaction with other substances, to cause fire or explosion or be injurious in any other way to the municipal wastewater system. Included in this prohibition are waste streams with a closed cup flashpoint of less than 140 F (60 C) using the test methods prescribed in 40 CFR 261.21.
- b. Solid or viscous substances in amounts which will cause obstruction to the flow to the POTW but in no case solids greater than one half inch (1/2")(1.27 centimeters) in any dimension.
- c. Any fat, oils or greases, including but not limited to petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through.
- d. Any wastewater having a pH less than 5.0 or more than 9.0 unless, as is provided for in 40 CFR 403.5(b)(2), the POTW is specifically designed to accommodate such discharges; or which may otherwise cause corrosive structural damage to the POTW.

- e. Any wastewater containing pollutants in sufficient quantity (flow or concentration), either singly or by interaction with other pollutants, to pass through or interfere with the municipal wastewater system, any wastewater treatment or sludge process, or constitute a hazard to humans or animals.
- f. Any noxious or malodorous liquids, gases, or solids or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair.
- g. Any substance which may cause the treatment plant effluent or any other residues, sludges, or scums, to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case, shall a substance discharged to the system cause the City to be in noncompliance with sludge use or disposal regulations or permits issued under Section 405 of the Act; the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or other state requirements applicable to the sludge use and disposal practices being used by the City.
- h. Any wastewater having a temperature greater than 150 F (55 C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104 F (40 C), unless as allowed by 40 CFR 403.5(b)(5), the approval authority, upon request of the POTW, approves alternate temperature limits.
- i. Any wastewater containing any radioactive waste or isotopes except as specifically approved by the City in compliance with applicable state or federal regulations.
- j. Any pollutants which result in the presence of toxic gases, vapor or fumes within the system in a quantity that may cause worker health and safety problems.
- k. Any trucked or hauled pollutants, except at discharge points designated by the City in accordance with Section 3.6 of the city sewer use ordinance.
- l. Storm water, surface water, groundwater, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, cooling water and unpolluted industrial wastewater, unless specifically authorized by the City.
- m. Any sludges, screenings, or other residues from the pretreatment of industrial wastes.
- n. Any medical wastes, except as specifically authorized by the City in a wastewater permit.
- o. Any material containing ammonia, ammonia salts, or other chelating agents which will produce metallic complexes that interfere with the municipal wastewater system.
- p. Any material identified as hazardous waste according to 40 CFR Part 261 except as specifically authorized by the City.
- q. Any wastewater causing the treatment plant effluent to demonstrate toxicity to test species. Species is defined in the bioassay testing requirements in the NPDES Permit issued to the City of St. Helens.
- r. Recognizable portions of the human or animal anatomy.
- s. Any wastes containing detergents, surface active agents, or other substances which may cause excessive foaming in the municipal wastewater system.

Wastes prohibited by this section shall not be processed or stored in such a manner that these wastes could be discharged to the municipal wastewater system.

## 12. Compliance with Applicable Pretreatment Standards and Requirements



Compliance with this permit does not relieve the permittee from its obligations regarding compliance with any and all applicable local, state and federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

## OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. **Proper Operation and Maintenance**

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 by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.
2. **Duty to Halt or Reduce Activity**

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
3. **Bypass of Treatment Facilities**
  - a. Bypass means the intentional diversion of waste streams from any portion of an individual user's treatment facility.
  - b. An Industrial User may allow any bypass to occur which does not cause pretreatment standards or requirements to be violated, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of c. and d.
  - c. If an Industrial User knows in advance of the need for a bypass, it shall submit prior notice to the City, if possible at least ten days before the date of the bypass. An Industrial User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the City within 24 hours from the time the Industrial User becomes aware of the bypass. A written submission shall also be provided with 5 days of the time the Industrial User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reuse, eliminate, and steps taken or planned to reduce, eliminate, and reoccurrence of the bypass. The City may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.
  - d. Bypass is prohibited, and the City may take enforcement action against an Industrial User for a bypass, unless:
    - (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
    - (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgement to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
    - (3) The Industrial User submitted notices as required under paragraph c. of the section.
  - e. The City may approve an anticipated bypass after considering its adverse effects, if the City determines that it will meet provisions (d)(1), (2) and (3) of this section.
4. **Removed Substances**

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

## MONITORING AND RECORDS

### 1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected and maintained to ensure their accuracy. Monitoring points shall not be changed without notification to and the approval of the City of St. Helens.

### 2. Flow Measurements

If flow measurement is required by this permit, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

### 3. Analytical Methods to Demonstrate Continued Compliance

Sampling and analyses shall be performed in accordance with procedures established by the EPA Region 10 Administrator pursuant to Section 304(h) of the Act and contained in 40 CFR part 136 and its amendments or with any other test procedures approved by the EPA Region 10 Administrator. Where 40 CFR part 136 does not include sampling or analytical techniques for the pollutants in question, or where the Region 10 Administrator determines that the part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other sampling and analytical procedures, including procedures suggested by the City or other parties, approved by the Region 10 Administrator.

### 4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures identified in Section C.3, the results of this monitoring shall be included in the permittee's self-monitoring reports.

### 5. Inspection and Entry

The permittee shall allow the City of St. Helens, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and
- e. Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under the permit, could originate, be stored, or be discharged to the sewer system.

### 6. Retention of Records

- a. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application.

This period may be extended by request of the City of St. Helens, EPA, or DEQ at any time.

- b. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the EPA, DEQ or the City of St. Helens shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

## 7. Record Contents

Records of sampling and analyses shall include:

- a. The date, exact place, time, and methods of sampling or measurements, and sample preservation techniques or procedures;
- b. Who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. Who performed the analyses;
- e. The analytical techniques or methods used; and
- f. The results of such analyses.

## 8. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions and/or civil penalties.

## ADDITIONAL REPORTING REQUIREMENTS

### 1. Planned Changes

The permittee shall give notice to the City of St. Helens 90 days prior to any facility expansion, production increase, or process modifications which result in new or substantially increased discharges or a change in the nature of the discharge.

In addition, the Permittee whom may have permit limitations calculated from a production based standard shall notify the City within two (2) business days after the Permittee has a reasonable basis to know that the production level will significantly change within the next calendar month. Any Permittee not notifying the City of such anticipated change will be required to meet the mass or concentration limits in its permit that were based on the original estimate of the long term average production rate.

### 2. Notification of Changed Discharge

- a. The Permittee shall promptly notify the City of any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the Permittee has submitted initial notification under 40 CFR 403.12(p).

### 3. Anticipated Noncompliance

The permittee shall give advance notice to the City of St. Helens of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

4. Automatic Resampling

If the results of the permittee's wastewater analysis indicates a violation has occurred, the permittee must notify the City of St. Helens within 24 hours of becoming aware of the violation and repeat the sampling and pollutant analysis and submit, in writing, the results of this repeat analysis within 30 days after becoming aware of the violation.

5. Duty to Provide Information

The permittee shall furnish to the City of St. Helens, within five working days, any information which the City of St. Helens may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

The permittee shall also, upon request, furnish to the City of St. Helens within five working days copies of any records required to be kept by this permit.

6. Signatory Requirements

All applications, reports, or information submitted to the City of St. Helens must contain the following certification statement and be signed as required in Sections a, b, c, or d below:

"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."

a. By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

- (1) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or;
- (2) The manager of one or more manufacturing, production, or operation facilities provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

b. By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

c. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a federal, state, or local governmental entity, or their agents.

d. By a duly authorized representative of the individual designated in paragraph a, b, or c of this section if:

- (1) the authorization is made in writing by the individual described in paragraph a, b, or c;

- (2) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or a well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

- (3) the written authorization is submitted to the City.

- e. If an authorization under paragraph d of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for the environmental matters for the company, a new authorization satisfying the requirements of paragraph d of this section must be submitted to the City prior to or together with any reports to be signed by an authorized representative.

7. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or with Section 2, General Sewer Use Requirements of City Ordinance No.2746, shall inform the City of St. Helens within 24 hours of becoming aware of the upset at 397-6272.

A written follow-up report of the upset shall be filed by the permittee with the City of St. Helens within five days. The report shall specify:

- a. Description of the upset, the cause(s) thereof and the upset's impact on the permittee's compliance status;
- b. Duration of noncompliance, including exact dates and times of noncompliance, and if not corrected, the anticipated time the noncompliance is expected to continue; and
- c. All steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner.

A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations of categorical pretreatment standards attributable to the upset event if the requirements of 40 CFR 403.16(c) are met.

8. Annual Publication

A list of all industrial users in Significant Noncompliance (SNC) during the twelve (12) previous months shall be annually published by the City of St. Helens in the largest daily newspaper (The Oregonian) within its service area. Accordingly, the permittee is apprised that noncompliance with this permit may result in publication of its name in an appropriate newspaper in accordance with this section.

9. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under Section 11, Judicial Enforcement Remedies of City Ordinance, or state or federal laws or regulations.

10. Penalties for Violations of Permit Conditions

Section 11, Judicial Enforcement Remedies of City Ordinance, provides that any person who violates a permit condition is subject to a civil penalty of at least \$1,000 per day of such violation. Any person who willfully or negligently violates permit conditions is subject to criminal penalties of a fine of up to \$1,000 per day of violation, or by imprisonment for one year, or both. The permittee may also be subject to sanctions under state and/or federal law. A second conviction is punishable by a fine of \$3,000 per day of violation, or by imprisonment for one year, or both.

11. Recovery of Costs Incurred

In addition to civil or criminal liability, the permittee violating any of the provisions of the permit or, General Sewer Use Requirements, City Ordinance, or causing damage to or otherwise inhibiting the City of St. Helens wastewater disposal system shall be liable to the City of St. Helens for any expense, loss, or damage caused by such violation or discharge. The City of St. Helens shall bill the permittee for the costs incurred by the City of St. Helens for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation of Section 10, Administrative Enforcement Remedies, and City Ordinance.

## EXHIBIT I NOV EXAMPLE

### CITY OF ST. HELENS

IN THE MATTER OF

NAME OF INDUSTRY  
ADDRESS

)  
)  
)  
)  
)

NOTICE OF VIOLATION

### LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the city under Section xxx of the city's sewer use ordinance. This order is based on findings of violation of the conditions of the wastewater discharge permit issued under Section xxx of the city's sewer use ordinance.

### FINDINGS

1. The City is charged with construction, maintenance, and control of the sewer system and treatment works.
2. To protect the sewer system and treatment works, city administers a pretreatment program.
3. Under this pretreatment program, [name of industry] was issued a discharge permit.
4. The discharge permit issued to [name of industry] contained numerical limits on the quality of pollutants, which [name of industry] could discharge and self monitoring requirements.
5. On [date], pollutant analysis revealed that the quantity of [pollutant] exceeded the permit limitation.

### NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS, [NAME OF INDUSTRY] IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the sewer use ordinance of the City of St. Helens.
2. [name of industry] Within ten days of the receipt of this notice, an explanation of the violation and a plan for the satisfactory correction and prevention thereof, including specific action, shall be submitted to the City.

---

[Name]  
[Address]



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## EXHIBIT J CEASE AND DESIST ORDER EXAMPLE

CITY OF ST. HELENS

IN THE MATTER OF

NAME OF INDUSTRY

ADDRESS

)  
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)  
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)  
)

CEASE AND DESIST ORDER

### LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the City under Section xxx of the city's sewer use ordinance. This order is based on findings of violation of the conditions of the wastewater discharge permit issued under Section of the city's sewer use ordinance.

### FINDINGS

1. [Industry] discharges non-domestic wastewater containing pollutants into the sanitary sewer system of the City of St. Helens.
2. [Industry] is a "significant industrial user" as defined by Section xxx of the city's sewer use ordinance.
3. [Industry] was issued a wastewater discharge permit on [date] which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.
4. Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of [industry].
5. This data shows that [industry] has violated the sewer use ordinance in the following manner:
  - a. [Industry] has continuously violated its permit limits for xxx in each sample collected between [date] and [date].
  - b. [Industry] has also failed to comply with an administrative compliance order requiring the installation of a pretreatment system and the achievement of compliance with its permit limits by [date].
  - c. [Industry] has failed to appear at a show cause hearing pursuant to an order requiring said attendance.

### ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, [INDUSTRY] IS HEREBY ORDERED TO:

1. Within 24 hours of receiving this order, cease all non-domestic discharges into the city's sanitary sewer. Such discharges shall no recommence until such time as [Industry] is able to demonstrate that it will comply with its current permit limits.
2. Failure to comply with this order may subject [Industry] to having its connection to the sanitary sewer sealed by the city, and assessed the costs therefor.

3. Failure to comply with this order shall also constitute a further violation of the sewer use ordinance and may subject [Industry] to civil or criminal penalties or such other enforcement response as may be appropriate.
4. This order, this [date] shall be effective upon receipt by [Industry].

---

[Name]  
[Address]

## EXHIBIT K CONSENT ORDER EXAMPLE

### CITY OF ST. HELENS

IN THE MATTER OF	)	
	)	
NAME OF INDUSTRY	)	ADDRESS
ADDRESS	)	
	)	
	)	

### CONSENT ORDER

WHEREAS, the City of St. Helens pursuant to its powers, duties and responsibilities vested in and imposed upon it by provisions of the city's sewer use ordinance, has conducted an ongoing investigation of [Industry] and has determined that:

1. The city owns and operates a wastewater treatment plant which is adversely impacted by discharge from industrial users, including [Industry], and has implemented a pretreatment program to control such discharges.
2. [Industry] has consistently violated the pollutant limits in its wastewater discharge permit as set forth in Exhibit 1, attached hereto.
3. Therefore, to ensure that [Industry] is brought into compliance with its permit limits at the earliest possible date, IT IS HEREBY AGREED AND ORDERED, BETWEEN [Industry] AND THE CITY OF ST. HELENS, that [Industry] shall:
  - a. By [date] obtain the services of a licensed professional engineer specializing in wastewater treatment for the purpose of designing a pretreatment system which will bring [Industry] into compliance with its wastewater discharge permit.
  - b. By [date], submit plans and specifications for the proposed pretreatment system in the city for review.
  - c. By [date], install the pretreatment system in accordance with the plans and specifications submitted in item b above.
  - d. By [date], achieve compliance with the limits set forth in Exhibit 1.
  - e. [Industry] shall pay \$1,000 per day for each and every day it fails to comply with the schedule set out in items a-d above. The \$1,000 per day penalty shall be paid to the City within five (5) days of being demanded by the City.
4. In the event [Industry] fails to comply with any of the deadlines set forth, [Industry] shall, within one (1) working day after expiration of the deadline, notify the City in writing. This notice shall describe the reasons for [Industry]'s failure to comply, the additional amount of time needed to complete the remaining work, and the steps to be taken to avoid future delays. This notification in no way excuses [Industry] from its responsibility to meet any later milestones required by this consent order.
5. Compliance with the terms and conditions of this consent order shall not be construed to relieve [Industry] of its obligation to comply with its wastewater discharge permit which remains in full force and effect. The City reserves the right to seek any and all remedies available to it under Section xxx of the city's sewer use ordinance for any violation cited by this order.

6. Violation of this consent order shall constitute a further violation of the city's sewer use ordinance and subjects [Industry] to all penalties described by Section xxx of the sewer use ordinance.
7. Nothing in this consent order shall be construed to limit any authority of the City to issue any other orders or take any other action which it deems necessary to protect the wastewater treatment plant, the environment or the public health and safety.

SIGNATORIES

FOR [INDUSTRY]

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name  
[Industry]

FOR CITY OF ST. HELENS

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name  
Address

## EXHIBIT L SHOW CAUSE ORDER EXAMPLE

### CITY OF ST. HELENS

IN THE MATTER OF

NAME OF INDUSTRY  
ADDRESS

)  
)  
)  
)  
)  
)

ADMINISTRATIVE

SHOW CAUSE ORDER

### LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the City under Section xxx of the city's sewer use ordinance. This order is based on findings of violation of the conditions of the wastewater discharge permit issued under Section xxx of the city's sewer use ordinance.

### FINDINGS

1. [Industry] discharges non-domestic wastewater containing pollutants into the sanitary sewer system of the City of St. Helens.
2. [Industry] is a "significant industrial user" as defined by Section xxx of the city's sewer use ordinance.
3. [Industry] was issued a wastewater discharge permit on [date] which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.
4. Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of [industry].
5. This data shows that [industry] has violated the sewer use ordinance in the following manner:
  - a. [Industry] has violated its permit limits for xxx in each sample collected between [date] and [date] for a total of [number] separate violations of the permit.
  - b. [Industry] has failed to submit a periodic compliance report due [date].
  - c. All of these violations satisfy the city's definition of significant violation.

### ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, [INDUSTRY] IS HEREBY ORDERED TO:

1. Appear at a meeting with city staff to be held on [date] at [time] in [place] of City Hall.
2. At this meeting, [Industry] must demonstrate why the City should not pursue a judicial enforcement action against [Industry] at this time.
3. This meeting will be closed to the public.
4. Representatives of [Industry] may be accompanied by legal counsel if they so choose.

5. Failure to comply with this order shall also constitute a further violation of the sewer use ordinance and may subject [Industry] to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.
6. This order, entered this [date] shall be effective upon receipt by [Industry].

Signed: \_\_\_\_\_  
[Name]  
[Address]

## EXHIBIT M ADMINISTRATIVE ORDER EXAMPLE

### CITY OF ST. HELENS

IN THE MATTER OF

NAME OF INDUSTRY  
ADDRESS

)  
)  
)  
)  
)  
)

ADMINISTRATIVE

COMPLIANCE ORDER

### LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the City under Section xxx of the city's sewer use ordinance. This order is based on findings of violation of the conditions of the wastewater discharge permit issued under Section xxx of the city's sewer use ordinance.

### FINDINGS

1. [Industry] discharges non-domestic wastewater containing pollutants into the sanitary sewer system of the City of St. Helens.
2. [Industry] is a "significant industrial user" as defined by Section xxx of the city's sewer use ordinance.
3. [Industry] was issued a wastewater discharge permit on [date] which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.
4. Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of [industry].
5. This data shows that [industry] has violated the sewer use ordinance in the following manner:
  - a. [Industry] has violated its permit limits for xxx in each sample collected between [date] and [date] for a total of [number] separate violations of the permit.
  - b. [Industry] has failed to submit a periodic compliance report due [date].
  - c. All of these violations satisfy the city's definition of significant violation.

### ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, [INDUSTRY] IS HEREBY ORDERED TO:

1. Within 180 days, install pretreatment technology which will adequately treat [Industry]'s wastewater to a level which will comply with its wastewater discharge permit.
2. Within 5 days, submit all periodic compliance reports due since [date].
3. Within 10 days, pay to the finance director of the City of St. Helens a fine of \$2,000 for the above-described violations in accordance with Section xxx of the sewer use ordinance.



4. Report, on a monthly basis, the wastewater quality and the corresponding flow and production information as described on page xxx of the wastewater discharge permit for a period of one year from the effective date of this order.
5. All reports and notices required by this order shall be sent, in writing, to the following address:  
  
Plant operations/pretreatment supervisor  
City Hall  
PO Box 278  
St. Helens, OR 97051
6. This order does not constitute a waiver of the wastewater discharge permit which remains in full force and effect. The City reserves the right to seek any and all remedies available to it under Section xxx of the sewer use ordinance for any violation cited by this order.
7. Failure to comply with the requirements of this order shall constitute a further violation of the sewer use ordinance and may subject [Industry] to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.
8. This order, entered this [date], shall be effective upon receipt of [Industry].

Signed: \_\_\_\_\_  
[Name]  
[Address]

**EXHIBIT N SUSPENSION OF SERVICE EXAMPLE**

CITY OF ST. HELENS

IN THE MATTER OF	)	
	)	
NAME OF INDUSTRY	)	SUSPENSION OF WASTEWATER
ADDRESS	)	
	)	SERVICE ORDER
	)	

Date of Notice:

Business or Individual:

Address:

Person Contacted/Title:

City Code Section Violation:

Results of Analysis:

Due to the serious nature of your violation, the City of St. Helens is ordering you to immediately stop the discharge of the effluent [in violation], and to eliminate any further industrial discharging by 5:00 p.m. [date].

In the event of your failure to voluntarily comply with this suspension order, the City shall take such steps as deemed necessary including, but limited to, immediate severance of your sewer connection, to prevent or minimize damage to our POTW system or endangerment to any individuals (City Code Section xxx).

\_\_\_\_\_  
Signature of person contacted

Refused to sign [ ]

\_\_\_\_\_  
Signature of City Representative

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