



Wastewater Management Department
Industrial Pretreatment Program
Riverside Park Water Reclamation Facility
4401 North Aubrey L. White Parkway
Spokane, WA 99205

FACT SHEET

FOR WASTEWATER DISCHARGE PERMIT #SIU-xxxx-xx

Effective Date: **DATE**

Expiration Date: **DATE**

A. INDUSTRIAL USER INFORMATION

Name of Facility
Facility Location Address
City, State, Zip

Number of connections to the sewer system (optional)

B. DESCRIPTION OF FACILITY OPERATIONS

Name of Facility is primarily engaged in the manufacturing of Products, SIC XXX and NAICS Code XXX.

Describe in detail the operations conducted at the facility, and why the business is an SIU/CIU. Estimated flow? Types of wastestreams? Raw materials?

Name of Facility began operations at the facility on DATE. Name of Facility employs number personnel and operates number days per week, DAY-DAY. Hours of operation are hours.

C. SAMPLE POINT DESCRIPTION/ FACILITY FLOW INFORMATION

Table 1: Sample Points and Expected Flows

SAMPLE POINT	EXPECTED FLOW PER OPERATIONAL DAY (GPD)		DESCRIPTION
	TOTAL	PROCESS	
###	Average Flow (Max Flow?)	Average Flow (Max Flow?)	Describe sample point location along with expected pollutants discharged, frequency of discharge
TOTAL	Total Flow	Total Process Flow	

Commented [BA1]: Chemists: please use this fact sheet to summarize the knowledge gained from the application, inspections, ER, P&S, O&M etc. and to document rationale for requirements in the permit.

Commented [BA2R1]: For the most part, red font is guidance for the chemist, not language to be included in the final fact sheet. Other colors are suggested language that may be applicable to different users.

Commented [BA3R1]: Permit guidance manual states: "Because permit fact sheets are not a binding part of the permit, any permittee requirements must be included in the permit for the requirement to be enforceable."

INDUSTRIAL WASTEWATER PERMIT	SAMPLE POINT	FLOW PER OPERATIONAL DAY (gpd)		
		TOTAL	PROCESS	
(Number)	001	160 gpd	160 gpd	Sample point flume, which wastewater the southeast wastewater sampling point wastewater and grinding. Sampling point end-of-process. Pollutants include: cadmium, silver, zinc, etc.
	002	450 gpd	160 gpd	Sample point the southeast wastewater sampling point wastewater sanitary waste bathrooms, facility's brei. 002 is down 001. Sample the end-of-process. Pollutants include: cadmium, silver, zinc, etc. and grease.
TOTAL		450	160	

Pre-prog wastewater and piping main → Treatment Facility → Sample Point 001 → Sample Point 002 → Sanitary Wastewater

Commented [BA41]:

D. PROCESS / FLOW INFORMATION

Process wastewater is generated from describe the process unit operations that generate industrial wastewater.

The total amount of process wastewater generated from the above operations is [number of gallons] gallons per day, based on [number of operational days] operational days per week.

Table 2: Facility Processes

SAMPLE POINT	PROCESS	PROCESS DESCRIPTION
		Process description with estimated gallons per day and/or a list of expected pollutants discharged
<i>Example:</i> 001	Gold rinse bath	Continuous overflow gold rinse bath (about 90 gpd)

E. DILUTION / AUXILIARY OPERATION / FLOW INFORMATION

Note: The permit writer should select one of the following applicable conditions:

[For IUs without dilution wastestreams]

There are no dilution wastestreams that combine with process wastewater.

[For IUs with dilution wastestreams]

The dilution wastestreams are generated from [sources of dilution]. The dilution wastestreams combine with the wastewater at Sample Point [sample point number] prior to discharging to the City of Spokane sanitary sewer. The total dilution flow is [total dilution flow in gallons] gallons per day.

Note to permit writer: If there are dilution wastestreams combined with categorical wastewater prior to the sampling point, the combined wastestream formula must be used to calculate alternative categorical limits. Include sample calculations in Section O of the fact sheet.

F. FLOW MEASURING DEVICE

Note: Flow measuring devices are required in certain circumstances. Please refer to the *Industrial User Permitting Guidance Manual* for more information. The permit writer should select one of the following applicable conditions.

[For IUs that do not have and are not required to install an effluent flow meter]
NAME OF FACILITY does not have an effluent flow meter and is not required to install or maintain an effluent flow meter. **List reason why.** Flow will be measured/estimated by METHOD.

[For IUs that do not have but are required to install an effluent flow meter.]
NAME OF FACILITY is required to install or maintain an effluent flow meter. **List reason why.**

[For IUs with effluent flow meter]
NAME OF FACILITY has installed a TYPE AND MAKE OF FLOW METER flow meter to monitor the wastewater flow discharge to the sanitary sewer.

G. PRETREATMENT UNIT OPERATIONS

[Describe the pretreatment system operations conducted at the facility]

H. POLLUTION PREVENTION / BEST MANAGEMENT PRACTICES

The accompanying permit includes Best Management Practices (BMPs) that must be followed. BMPs are enforceable procedures based on regulations, that minimize pollutants discharged to the sewer system or the environment. They often include schedules of activities, prohibitions of practices, maintenance procedures, and other management practices. 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. (Cross Reference: 40 CFR §403.3(e)). Name of facility has implemented the following pollution prevention practice(s) and/or best management practice(s):
~~Insert a description of all pollution prevention practices and/or best management practices.~~

I. RATIONALE FOR MONITORING LOCATIONS / SAMPLING POINTS

The permit writer should document its rationale for monitoring locations and sampling points. The documentation should include information regarding applicability for an end of process monitoring, end of pipe monitoring location, or both (i.e. end of process for determining categorical pretreatment standard compliance and end of pipe for determining local pretreatment standard compliance).

J. RATIONALE FOR MONITORING FREQUENCY REQUIREMENTS

The permit writer should adequately document the rationale used for establishing the permittee's monitoring requirements. In addition, the permit writer should review both the

minimum federal monitoring frequency and the minimum monitoring frequency established by its approved program before establishing monitoring frequency requirements. Citations from development documents may be included here.

Prior to implementing alternative monitoring frequency options less stringent than the federal requirement, the permit writer must ensure that the Control Authority has established the legal authority within its approved program to implement these options. Alternative monitoring frequency options include, but are not limited to:

- Reduced monitoring (40 CFR 403.12(e)(3))
- Monitoring waivers (40 CFR 403.12(e)(2)) (e.g. pollutant not present)
- Classification of NSCIU (40 CFR 403.3(v)(2))
- Monitoring waivers in on the basis of specific categorical standards

K. RATIONALE FOR REPORTING REQUIREMENTS

The permit writer should adequately document the rationale used for establishing the permittee's reporting requirements. In addition, the permit writer should review both the minimum federal and the minimum reporting frequencies and requirements established by its approved program before establishing reporting frequencies and requirements.

Prior to implementing alternative reporting options less stringent than the federal requirement, the permit writer must ensure that the Control Authority has established the legal authority within its approved program to implement these options. Alternative monitoring frequency options include, but are not limited to:

- TTO certification
- Reduced monitoring reporting (40 CFR 403.12 (e)(3))
- Monitoring waiver reporting (40 CFR 403.12(e)(2))
- NSCIU reporting (40 CFR 403.3(v)(2) & 40 CFR 403.12(q))
- Specific reporting requirements as listed in specific categorical standards

1. Signatory Requirements (SMC 13.03A.0305(A))

All discharge permit applications and user reports must be signed and certified by an authorized representative as defined in SMC 13.03A.0103. IU NAME has designated the following individuals as authorized facility representative(s) and Electronic Signature Agreements are on file with the City to allow electronic reporting.

Table 3: Authorized Representative(s)

Name	Title

2. Discharge Monitoring Report (SMC 13.03A.0403)

The City of Spokane requires monthly reporting from Significant Industrial Users in the form of discharge monitoring reports. This report will include those pollutants for which the industry self-monitors. For **IU NAME**, this will include **flow and pH**. If the industry monitors any regulated pollutant at the appropriate sampling location more frequently than required, the results of the monitoring shall be included in the report. (40 CFR §403.12(g)(6)).

3. 90 day Compliance Report

All new industrial users subject to Categorical Pretreatment Standards must submit a 90 day compliance report to the City of Spokane. The purpose of the 90 day compliance report is to provide initial information to the City of Spokane on the facility's ~~current~~ compliance status with Categorical Pretreatment Standards. The 90 day compliance report requirements will be listed in the permit. Within 90 days after the commencement of discharge OR the effective date of this permit, the report must be submitted. (40 CFR §403.12(b)(1)-(7) and 40 CFR §403.12(d))

Commented [BA5]: Only for new CIUs

L. RATIONALE FOR SPECIAL CONDITIONS

The permit writer should describe any special conditions imposed in the permit. Special conditions can include, but is not limited to special definitions, compliance schedules, equivalent mass limit requirements, equivalent concentration limit requirements, one time monitoring requirements, biomonitoring or other toxicity requirements, sludge disposal plans, or additional monitoring of pollutant that are limited in the permit in response to noncompliance.

Note: Do any categorical pH limits apply to the industry?

1. Slug Potential Evaluation

The City of Spokane conducted a slug potential evaluation of name of facility on date.

The permit writer should select one of the following applicable conditions:

[For IUs required to develop and implement a slug control plan]

The City of Spokane has determined that name of facility is required to develop and implement a slug control plan.

[For IUs that have already developed and implemented a slug control plan]

Commented [BA6]: Chemist: Please print and fill out a Slug Potential Evaluation sheet to include in the user's file. The sheet is found in the Slug Control Plan folder on the W drive.

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The City of Spokane has determined that Name of facility is required to develop and implement a slug control plan. The plan was submitted to the City on DATE. The plan was reviewed on DATE to ensure it contained all of the minimum federal requirements as listed in 40 CFR 403.8 (f)(2)(vi).

Commented [BA7]: Chemist: Please print and fill out a Slug Control Plan Review Checklist to include in the user's file. The sheet is found in the Slug Control Plan folder on the W drive.

[For IUs not required to develop or implement a slug control plan]
The City of Spokane has determined that name of facility is not required to develop and implement a slug control plan because [justification here].

2. Compliance Schedule

Rationale for compliance schedule. The following table represents the compliance schedule milestones for the development, delivery, and acceptance of the required **XXXX**.

Table 4: Compliance Schedule

Milestone	Action	Due Date
1	Other milestone	DATE
2	Other milestone	XX months following milestone 3
3	Other milestone	XX months following milestone 4
4	Other milestone	XX months following milestone 5

3. Operation and Maintenance Manual

In those cases where the facility includes mechanical components, a detailed Operation and Maintenance (O&M) manual must be prepared before completing the construction. The purpose of the manual is to present technical guidance and regulatory requirements to the operator to enhance operation under both normal and emergency conditions. [WAC 173-240-080]

4. AKART

Washington State requires all dischargers to treat wastewater using all known, available, and reasonable methods of prevention, control, and treatment (AKART). AKART is a technology-based approach to limiting pollutants from wastewater discharges, which requires an engineering judgment and an economic judgment. AKART must be applied to all wastes and contaminants prior to entry into waters of the state in accordance with RCW 90.48.010 and 520, WAC 173-200-030(2)(c)(ii), and WAC 173-216-110(1)(a).

An AKART evaluation was provided in **NAME OF FACILITY** Engineering Report.
The methods utilized at this facility include **LIST METHODS**.

5. Toxic Organic Management Plan (TOMP) (40 CFR 433.12) not all CIUs need this

Commented [AB8]: Red font - guidance, Black font - standard language if this section is needed, Pick a color depending on situation.

Chemists: Categories with TTO monitoring include electroplating, metal finishing, electronic components, copper forming, aluminum forming and coil coating. In lieu of requiring semi-annual monitoring for Total Toxic Organics, an industry can write a TOMP and include a certification statement as part of the monthly Discharge Monitoring Report.

In requesting the certification alternative, industry must submit a toxic organic management plan (TOMP) that specifies the toxic organic compounds used; the method of disposal used instead of dumping, and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater.

~~EXAMPLE: According to 40 CFR 433.12(a), facilities subject to the Metal Finishing CATEGORY Regulations must analyze for reasonably expected toxic organics or submit a TOMP certification Plan in lieu of monitoring every six months. The list of expected toxic organics is as follows:~~

- [List specific chemicals identified]

~~This determination of reasonably expected toxic organics is based on the evaluation of by the City of Spokane POTW and [periodic compliance sampling data reported between [DATE] and [DATE] OR (or from SDSs provided with the permit application (if new permit))].~~

~~[Name of Facility] elected to develop a TOMP within 90 days of the effective date of the permit. Upon approval it will substitute for monitoring for expected TTOs every 6 months. Additionally, [Name of Facility] must submit a TTO certification statement as part of the monthly Discharge Monitoring Report.~~

~~[Name of facility] has submitted a TOMP for review which the [name of Control Authority] has approved. The TOMP satisfies the above requirement and [name of facility] will be exempt from monitoring total toxic organics.~~

~~According to 40 CFR 433.12(a), facilities subject to the Metal Finishing Regulations must analyze for reasonably expected toxic organics or submit a TOMP certification in lieu of monitoring. On [DATE], [name of facility] submitted a TOMP for the [name of Control Authority]'s approval. Upon review and evaluation, the TOMP was approved on [DATE]. Pursuant to this approval, [name of facility] is exempt from toxic organics monitoring. [Name of facility] must submit a TTO certification statement as part of the monthly Discharge Monitoring Report.~~

[Name of Facility] has elected not to develop a TOMP, so the permit requires monitoring for the expected toxic organics listed above.

All users will monitor for TTO as part of the Priority Pollutant Scan once per permit cycle even if they elect to develop a TOMP to confirm compliance.

M. RATIONALE FOR WASTEWATER DISCHARGE LIMITATIONS

Permit writer should discuss the basis for classifying the IU. Important information should include: 1) starting date of operation; 2) process operations; 3) process modification (if any); and 4) process wastewater flow rates. The documentation of the rationale for effluent limits should also include, but is not limited to:

- The classification of existing versus new sources, or the possibility that a CIU is subject to both existing and new source requirements (for CIUs).
- Cyanide discharge limits (whether compliance with either cyanide (total) or cyanide (amenable) is more appropriate)
- Combined wastestream formula
- Production-based limits
- Total toxic organic limits.
- Calculation of equivalent limits
- Site-specific local limits
- Special local limit considerations

If alternative limits are established, the permit writer should include any applicable calculations in Section O of the fact sheet.

Include the list of the actual wastewater discharge limitations included in the permit and document the rationale for those wastewater discharge limitations.

[Name of Facility] will be required to meet the applicable limits in the table below at [LOCATION].

Table 4 or 5: Comparison of compliance data to applicable limits

Parameter	Average Concentrations DATE-DATE from Linko CTS or permit application	Maximum Allowable Discharge Limit ¹
Arsenic, total		0.12 mg/L

Commented [BA9]: Chemist: update table to include any limits different than Local Limits or additional pollutants

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Cadmium, total		0.093 mg/L
Chromium, total		<5.0 mg/L
Copper, total		0.74 mg/L
Lead, total		0.32 mg/L
Mercury, total		0.012 mg/L
Molybdenum, total		0.66 mg/L
Nickel, total		1.74 mg/L
Selenium, total		0.40 mg/L
Silver, total		0.46 mg/L
Zinc, total		2.59 mg/L
Cyanide, total		1.01 mg/L
Benzene		<0.5 mg/L
pH ²	N/A	Between 5.0-12.0

1. Maximum Allowable Discharge Limit is defined as the maximum concentration or loading of a pollutant allowed to be discharged at any time, determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and the duration of the sampling event.
2. The City of Spokane POTW has pH limits of 5.0-12.0, which will be enforced.

Table 5 or 6: Discharge Flow Limits

Maximum Instantaneous Flow Limit	Shall not exceed XXX gallons per minute
Total Daily Maximum Flow Limit	Shall not exceed XXX gallons per day

1. The Maximum Instantaneous Flow limit and Total Daily Maximum Flow limit have been approved by a City of Spokane Sewer Engineer. A 20% safety factor was OR WAS NOT added by the City of Spokane to the Total Daily Maximum Flow requested by NAME OF FACILITY due to pipe capacity. The Maximum Instantaneous Flow limit is per user request.

~~4. The Total Daily Maximum Flow limit is per user request. The Maximum Instantaneous Flow limit has been approved by a City of Spokane Sewer Engineer. A 20% safety factor was added by the City of Spokane if the pipe has adequate capacity.~~

N. RATIONALE FOR SAMPLE TYPE

The permit writer should document its rationale for requiring composite sampling, grab sampling, or both. If composite sampling is required, determine if dayshift only or 24 hour time based composite sampling is more appropriate. In addition, the permit writer should include documentation of whether continuous monitoring is required.

O. CALCULATIONS

Commented [BA10]: Not required for all users.

The permit writer should include the following if the CWF applies due to dilution and/or if an integrated facility.

The federal categorical pretreatment standards for **Name of Facility** were adjusted using the combined wastestream formula (CWF). The steps used to compute the alternative daily maximum and monthly average limits are as follows:

Step 1: Reference the combined wastestream formula from 40 CFR 403.6 (e):

$$C_T = \left(\frac{\sum_{i=1}^N C_i F_i}{\sum_{i=1}^N F_i} \right) \left(\frac{F_T - F_D}{F_T} \right)$$

Where:

C_T = Alternative concentration limit for the pollutant

C_i = Categorical pretreatment standard concentration limit for the pollutant in regulated stream i

F_i = Average (at least 30-day average) daily flow of regulated stream i

F_D = Average daily flow (at least 30-day average) of dilute wastestream(s)

F_T = Average daily flow (at least 30-day average) through the combined treatment facility, including regulated, unregulated, and dilute wastestreams;

N = Total number of regulated streams

Step 2: Calculation of the Alternative Daily Maximum and Monthly Average Limits:

Include a sample calculation of an alternative daily maximum and monthly average limit using appropriate variable values. The permit writer should include a list of all variables used.

For calculation of equivalent mass limits for concentration limits

Step 1: Calculate the equivalent mass limit for the daily maximum concentration Standard:

$$M_{DEQ} = 8.34 * Q_{AVG} * C_D$$

Where:

M_{DEQ} = Equivalent monthly mass limits, lbs/day

8.34 = Conversion factor

Q_{AVG} = Actual Average Daily Flow, million gallons per day [Note: The period of when the flow rate value was determined should be documented.]

C_D = Daily Average Categorical Pretreatment Standards, milligrams per liter

Step 2: Calculate the equivalent mass limit for the monthly average concentration Standard:

$$M_{DEQ} = 8.34 * Q_{AVG} * C_M$$

Where:

M_{DEQ} = Equivalent monthly mass limits, lbs/day

8.34 = Conversion factor

Q_{AVG} = Actual Average Daily Flow, million gallons per day

C_M = Monthly Average Categorical Pretreatment Standards, milligrams per liter

[Include sample calculations of production-based limits, including applicable production values and flow rates.]

Possible attachments to consider:

ATTACHMENT A – Industry Submittals (Process flow diagram, etc.)

ATTACHMENT B – Description of Existing Pollution Abatement Facilities

ATTACHMENT C – Monitoring Data

ATTACHMENT D – Maps (GIS, Side Sewer, Sampling Locations, etc.)

Industry Name Fact Sheet
Permit Number

APPENDIX A: COMMENTS ON PERMIT AND FACT SHEET