



SOUTH PLATTE
RENEW

Industrial Pretreatment Division

Control Plan Policy

South Platte Renew
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Control Plan Policy

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1.0 Purpose

This policy was developed in order to:

- Implement Environmental Protection Agency (EPA) requirements regarding slug discharges [40 CFR 403.8(f)(2)(vi)] from significant industrial users (SIUs).
- Implement Englewood and Littleton Municipal Code requirements regarding spills and slug discharges [12-2-5(E)(9) and 7-5-25(F)(9), respectively].
- Prevent substances from reaching the sanitary sewer and potentially causing the following issues:
 - Adverse affects on worker health and safety;
 - Pass-through of pollutants to the South Platte River;
 - Interference with plant operations at South Platte Renew (SPR); and/or
 - Contamination of biosolids at SPR.
- Outline the minimum requirements for a Control Plan, Toxic Organic Management Plan (TOMP) and Closure Plan.

2.0 Scope and Applicability

2.1 Scope

This policy addresses requirements of industrial and commercial users regarding the development of a Control Plan, TOMP, and Closure Plan.

2.2 Applicability

This policy applies to all industrial and commercial users within the SPR service area. The requirements and level of complexity of application of this policy will vary on a case-by-case basis. Facilities issued an industrial wastewater permit are required to have a Control Plan. Other commercial and industrial facilities may be required to have a Control Plan.

3.0 Definitions and Acronyms

3.1 Definitions

Categorical Industrial User (CIU) - An industrial user subject to categorical standards under 40 CFR 403.6 and 40 CFR Chapter 1, Subpart N.

Closure Plan – A plan that describes the closure requirements for permitted facilities undergoing partial or complete closure activities to ensure closure activities are completed and wastes have been properly disposed and remaining access to sanitary and storm sewers are protected.

Control Plan – Documented procedures, operations, activities, logs, etc. used to help prevent accidental spills or slug discharges and minimize adverse impact from any accidental or slug discharge.

Division – The SPR Industrial Pretreatment Division

Industrial or Commercial User (IU) – Any user who discharges industrial or commercial wastewater from industrial or commercial processes, not to include sanitary waste.

Publicly Owned Treatment Works (POTW) - A publicly owned treatment works includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage and any conveyances, which convey wastewater to the treatment plant.

Significant Industrial User (SIU) – An industrial user subject to categorical standards under 40 CFR 403.6 and 40 CFR Chapter 1, Subpart N; and any other industrial user that:

- Discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, non-contact cooling and boiler blow down wastewater);
- Contributes a process waste stream which makes up 5% or more of the average dry weather hydraulic or organic capacity of the POTW; or
- Is designated by the Division on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or Requirement.

Slug Discharge – Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch, which has a reasonable potential to cause interference or pass-through or in any other way violate any Pretreatment Standards or the City of Englewood Municipal Code (12-2-5) or the City of Littleton Municipal Code (7-5-25).

Special Discharge Request - An application for a one-time, non-routine discharge to the POTW.

Spill - A substance or material that has contacted the floor, containment structures (trenches, sumps, pallets, etc.), or other surface that is not the primary or intended location for that material.

Total Toxic Organics – Toxic organics consist of the EPA designated priority pollutants, excluding inorganics and cyanide. EPA defines Total Toxic Organics (TTO) as the sum of the masses or concentrations of specific toxic organic compounds found in a Categorical Industrial User's discharge at a concentration > 0.01 milligrams per liter (mg/L).

Toxic Organic Management Plan (TOMP) – A plan that specifies the toxic organic compounds used at a facility, the method of disposal used, and procedures for ensuring that toxic organics do not spill or leak into wastewater discharged to the POTW.

User – Any person who contributes, causes, or permits the contribution of wastewater to SPR.

3.2 Acronyms

CDPS – Colorado Discharge Pollutant System

CIU - Categorical Industrial User

EPA – Environmental Protection Agency

IU – industrial user

mg/L – milligrams per liter

POTW – Publically Owned Treatment Works

SDS – material safety data sheet

SIU – significant industrial user

SPR – South Platte Renew

TOMP – Toxic Organic Management Plan

TTO – total toxic organics

4.0 Roles and Responsibilities

4.1 Authority

This policy was developed under the authority of the Englewood Municipal Code 12-2-5 and Littleton Municipal Code 7-5-25.

4.2 The Industrial Pretreatment Division

The Industrial Pretreatment Division (Division) may require a user to develop, submit for approval, and implement a Control Plan, TOMP, Closure Plan, and/or take other action necessary to control slug discharges.

4.3 Commercial and Industrial Users

All commercial and industrial users are required to have measures in place to control slug discharges. Commercial and industrial users may be required to have a Control Plan and/or a Closure Plan.

4.4 Significant Industrial User

Each significant industrial user (SIU) shall have a Control Plan. SIUs may be required to have a TOMP and/or Closure Plan.

5.0 Requirements

This section provides the requirements for Control Plans, TOMPs, and Closure Plans.

5.1 Control Plan

Each User shall provide protection from accidental discharges and slug loads of pollutants. Control mechanisms to prevent the occurrence or discharge of spills or slug loads shall be provided and maintained at the User's expense.

5.1.1 Minimum Control Plan Requirements

A Control Plan is required to address, at a minimum, the following elements:

- Detailed plans (schematics) showing facility layout and plumbing representative of operating procedures;
- Description of contents and volumes of any process tanks (process and storage tanks shall be labeled);
- Description of discharge practices, including non-routine batch discharges.
- Listing of stored chemicals, including location and volumes;
- Procedures for immediately notifying the Division of any spill or Slug Discharge, as identified in section 5.1.2.
- Procedures to prevent adverse impact from any accidental or Slug Discharge. Such procedures include, but are not limited to:
 - Inspection and maintenance of storage areas
 - Handling and transfer of materials
 - Loading and unloading operations
 - Control of plant site runoff
 - Worker training
 - Building of containment structures or equipment
 - Measures for containing toxic organic pollutants, including solvents
 - Measures and equipment for emergency response
- Procedures for managing spills as identified in section 5.1.3; and
- Any other information as required by the Division.

5.1.2 Reporting Requirements

It is the responsibility of the User to comply with the reporting requirements of the City of Englewood Municipal Code [12-2-5(E)(10)] and City of Littleton Municipal Code [7-5-25(F)(10)]:

- In the case of any discharge, including, but not limited to, spills, accidental discharges, discharges of a non-routine, episodic nature, a

non-customary batch discharge, a Slug Discharge or a discharge that may cause potential problems for the POTW, the User shall immediately telephone and notify the City of the incident. This notification shall include:

- Name of the facility;
 - Location of the facility;
 - Name of the caller;
 - Date and time of discharge;
 - Date and time discharge was halted;
 - Location of the discharge;
 - Estimated volume of the discharge;
 - Estimated concentration of pollutants in discharge;
 - Corrective action taken to halt the discharge;
 - Method of disposal if applicable.
- Within five (5) working days following such discharge, the User shall, unless waived by the Division, submit a detailed written report describing the cause(s) of the discharge and the measures to be taken by the User to prevent similar future occurrences. Such notification shall not relieve the User of any expense, loss, damage, or other liability which might be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the User of any fines, penalties, or other liability.
 - Notice to Employees – a notice shall be permanently posted on the user's bulletin board or other prominent place advising employees who to call in the event of an accidental or slug discharge. Employers shall ensure that all employees who work in any area where an accidental or slug discharge may occur or originate are advised as to the emergency notification procedures.
 - Special Discharge Request – a special discharge request shall be submitted to the Division for proposed one-time, non-routine discharges to SPR (a Special Discharge Request Form can be obtained from the Division). If approved, a Special Discharge Request may include requirements of this Control Plan Policy.

5.1.3 Spill Control

All users are required to have measures in place to control unwanted discharges to the sanitary sewer or the environment. Chemicals, waste oil and other liquid materials must be stored away from drains, external doorways, and bay doors, or other structural openings or within secondary containment to reduce the potential for spills reaching the sanitary sewer and/or the environment. Spill control measures may include floor drain closure, secondary containment, spill kits, and storage location.

5.2 Toxic Organic Management Plan (TOMP) Requirements

A TOMP, sometimes referred to as a Solvent Management Plan, identifies toxic organic pollutants present at a facility and the method of disposal used for each of those pollutants. Certain categorical industrial users (CIUs) that must meet categorical pretreatment standards for toxic organics may have the option to submit a TOMP in lieu of monitoring.

The electroplating (40 CFR Part 413), metal finishing (40 CFR Part 433), and electrical and electronic components (40 CFR Part 469) categories each allow for the certification that no concentrated toxic organics are present in the discharge in lieu of regular monitoring requirements. With approval, a facility may submit a written request to certify for total toxic organics (TTOs) as long as the following criteria are met:

- An SDS review has been completed by the Division. The Division may request that the facility provide written documentation from chemical manufacturer's regarding the presence or absence of toxic organics in chemicals present or planned to be used at the facility.
- All required TTO monitoring has been completed and the results submitted. This includes initial and 90-day TTO monitoring, and any additional Division-required monitoring.
- Submission of a TOMP that satisfies SPR regarding:
 - Identification of industry-specific toxic organics present at the facility;
 - Method of disposal, such as incineration, contract hauling, or reclamation;
 - Procedures for ensuring that toxic organics do not routinely spill or leak into the waste stream;
 - Elimination of toxic organics from processes by substitution; and
 - Ongoing review of new chemicals to identify toxic organics.

The Division will review and evaluate all requests for TTO certification and will provide approval or denial in writing to the requesting facility. Once a categorical user has been approved, the following certification statement must be included with all compliance reports submitted to the Division:

“Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation or pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the SPR Industrial Pretreatment Division.”

All TTO-related monitoring and certifications must be performed in accordance with the appropriate categorical regulations. All approvals for certification are reviewed by the Division on an annual basis. The certification may be rescinded if the Division determines that the facility is not adequately implementing the TOMP, any monitoring

results indicate the presence of toxic organics in concentrations considered significant by the Division, the facility fails to include the TTO certification statement in the self-monitoring reports, or for other related issues determined to be significant by the Division.

If monitoring is necessary to measure compliance with the TTO standard, the industrial discharger need analyze for only those pollutants which would reasonably be expected to be present.

5.3 Closure Plan Requirements

A closure plan may be required when a facility plans to close all or a portion of their facility or process. The closure plan shall include the following:

- A **written notification** of the planned closure.
- A **scope** statement that describes what portion of the facility will be closed including the processes and physical space, and whether the closed portions will be eliminated, moved, outsourced, or any other means of closure.
- A **schedule** including a list of tasks, each with a start and end date. The list of tasks will be in sufficient detail to clearly understand what is being accomplished.
- A **description** explaining each of the tasks in the schedule and including any other appropriate administrative information.
- An **inventory** including complete lists of those items to be eliminated from the facility due to closure such as equipment, chemicals, and waste items including means of disposal.

When the written closure plan is completed, it shall be submitted to the Division for approval. Components of a closure plan may need to be updated as progress in the closure process continues. Closure plans shall be revised as needed. Closure shall be deemed complete upon physical inspection by the Division.

6.0 Enforcement

This policy sets forth the **minimum** requirements for a Control Plan, TOMP and Closure Plan. Additional measures may be required beyond those described in this policy. Nothing in this policy shall be construed so as to relieve the industrial user from civil or criminal penalties for noncompliance.

When the Division finds that a User has violated, or continues to violate, any provision of the applicable municipal code (Englewood or Littleton), an industrial wastewater permit, or order issued hereunder, or any other Pretreatment Standard or Requirement, the Division may fine such User in an amount not to exceed five thousand dollars (\$5,000.00) per day, per violation. Such fines shall be assessed on a per violation, per day basis. In the case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation.

7.0 References

40 CFR Part 403

Englewood Municipal Code 12-2-5

Littleton Municipal Code 7-5-25

8.0 Approval and Issuance

This policy has been approved and issued by the SPR Industrial Pretreatment Administrator.