

Wastewater Operating Services Industrial Waste Control

9300 W. Jefferson, Ste. 210 Detroit, Michigan 48209

CERTIFIED MAIL

March 5, 2020

Mr. Greg Reichard Aevitas Specialty Services Corp. 663 Lycaste Street Detroit, MI 48214

Re: Modification(s) to Wastewater Discharge Permit No. 913-94645-IU

Dear Mr. Reichard:

The enclosed Modified Wastewater Discharge Permit No. 913-94645-IU reflects the addition of requirements regarding Per- and Poly- fluoroalkyl Substances (PFAS) monitoring, notification and restrictions.

These changes have been made as a result of the Great Lakes Water Authority's (GLWA's) ongoing efforts in managing significant and potential sources of PFAS that discharge wastewater to the Publicly Owned Treatment Works (POTW).

In accordance with City of Detroit, Ordinance No. 08-05, or equivalent local ordinance, any appeal regarding this permit must be submitted within twenty (20) days from the date of mailing of this permit.

If you have questions or need clarification, please contact Mr. William Burbidge, of the Industrial Waste Control Group, Permits Section, at (313) 297-5855.

Sincerely,

Stephen J. Kuplicki, P.E., J.D.

Operations Manager

Industrial Waste Control Group

SJK/WB Enclosure



Wastewater Operating Services
Industrial Waste Control Group
9300 W. Jefferson, Suite 210
Detroit, Michigan 48209

WASTEWATER DISCHARGE PERMIT

PERMIT NO.: 913-94645-IU

SECTION A: GENERAL INFORMATION

Facility I.D. No.:

94645

Company Name:

Aevitas Specialty Services Corp.

Facility Address:

663 Lycaste Street

Detroit, MI 48214

Mailing Address:

663 Lycaste Street

Detroit, MI 48214

The Great Lakes Water Authority ("GLWA") hereby authorizes the Categorical Significant Industrial User specified above to discharge wastewater to the GLWA's sewer system, in accordance with the terms of this Wastewater Discharge Permit. The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

This permit is granted in accordance with the application filed with the GLWA, and in conformity with plans, specifications, and other substantive data submitted to the GLWA in support of the above application. This discharge authorization is granted in accordance with the Wastewater Discharge Ordinance of the City of Detroit or equivalent local ordinance, and any applicable provisions of federal or state laws or regulations.

It is the responsibility of the Permittee to submit a permit reapplication form at least ninety (90) days before the expiration date of this permit with all supporting documentation and re-certifications. Upon a timely filing, this permit will continue in effect until it is superseded by a successive final Wastewater Discharge Permit.

Effective Date:

March 5, 2020

Expiration Date:

September 1, 2022

Authorized by:

Stephen J. Kuplicki, P.E., J.D.

Operations Manager

Industrial Waste Control Group

March 5, 2020

Permit No.: 913-94645-IU

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENT

Classification:

40 CFR Part 437.26

Subcategory:

Subpart B-Oils Treatment and Recovery, Pretreatment Standards for New

Sources (PSNS)

Representative Sampling Location:

MH in boiler room; 4' SW of boiler room entrance, 6'

West of east wall

Batch Discharge Information:

Frequency - 4 to 5 batches per day

Duration - 2 hours per batch

Maximum Volume - 12,000 gallons per batch

Authorized Composite Sampling

Flow-proportional

Method (See Section F):

Applicable Discharge Limitations (reported in mg/l unless otherwise indicated)

Parameter	Daily Max	Monthly Avg.	Min Sampling Frequency
2,4-Dichlorophenol (DCPH)	5.5		1 per 6 Month
2,4-Dinitrophenol (DNPH)	2		1 per 6 Month
2-Chlorophenol (CLPH)	2		1 per 6 Month
4-Chloro-3-methylphenol (4C3MP)	1		1 per 6 Month
4-Chlorophenol (4CP)	2		1 per 6 Month
4-Nitrophenol (4NPH)	15		1 per 6 Month
Acidity/Alkalinity (pH)	5-11.5 SU		2 per Month
Arsenic (As)	1		2 per Month
Biochemical Oxygen Demand (BOD)	7500		2 per Month
Bis (2-Ethylhexyl) Phthalate (BEHP)	0.215	0.101	1 per 4 Days
Cadmium (Cd)	1		2 per Month
Carbazole (CARB)	0.598	0.276	1 per 4 Days
Chromium (Cr)	0.746	0.323	1 per 4 Days
Cobalt (Co)	56.4	18.8	1 per 4 Days
Copper (Cu)	0.5	0.242	1 per 4 Days

March 5, 2020

Permit No.: 913-94645-IU

Parameter	Daily Max	Monthly Avg.	Min Sampling Frequency
Cyanide (Available) (AVCN)	1		2 per Month
Fats, Oil or Grease (FOG)	1500		2 per Month
Fluoranthene (FLAN)	.0537	0.0268	1 per 4 Days
Iron (Fe)	1000		2 per Month
Lead (Pb)	0.35	0.16	1 per 4 Days
Mercury (Hg)	Non-Detect		2 per Month
n-Decane (NDEC)	0.948	0.437	1 per 4 Days
Nickel (Ni)	5		2 per Month
n-Octadecane (NOCT)	0.589	0.302	1 per 4 Days
PFAS Standard List (PFAS)	Report ng/L		Table II Page 4
Phenol Alcohol (PHEN AL)	14		1 per 6 Month
Phosphorus (P)	250		2 per Month
Silver (Ag)	1		2 per Month
Tin (Sn)	0.335	0.165	1 per 4 Days
Total PCB (PCB)	Non-Detect		1 per 6 Month
Total Suspended Solids (TSS)	7500		2 per Month
Zinc (Zn)	7.3	4.5	1 per 4 Days

Approved By:

Date: 03/04/2020

March 5, 2020

Permit No.: 913-94645-IU

Table – II: Monitoring Requirements For Per- and Poly- fluoroalkyl Substances

Perfluorobutanoic acid (PFBA)	Report	1 per 3 Months
Perfluoropentanoic acid (PFPeA)	Report	1 per 3 Months
Perfluorohexanoic acid (PFHxA)	Report	1 per 3 Months
Perfluoroheptanoic acid (PFHpA)	Report	1 per 3 Months
Perfluorooctanoic acid (PFOA)	Report	1 per 3 Months
Perfluorononanoic acid (PFNA)	Report	1 per 3 Months
Perfluorodecanoic acid (PFDA)	Report	1 per 3 Months
Perfluoroundecanoic acid (PFUnDA)	Report	1 per 3 Months
Perfluorododecanoic acid (PFDoDA)	Report	1 per 3 Months
Perfluorotridecanoic acid (PFTrDA)	Report	1 per 3 Months
Perfluorotetradecanoic acid (PFTeDA)	Report	1 per 3 Months
Perfluorobutane Sulfonic acid (PFBS)	Report	1 per 3 Months
Perfluoropentane Sulfonic acid (PFPeS)	Report	1 per 3 Months
Perfluorohexane Sulfonic acid (PFHxS)	Report	1 per 3 Months
Perfluoroheptane Sulfonic acid (PFHpS)	Report	1 per 3 Months
Perfluorooctane Sulfonic acid (PFOS)	Report	1 per 3 Months
Perfluorononane Sulfonic acid (PFNS)	Report	1 per 3 Months
Perfluorodecane Sulfonic acid (PFDS)	Report	1 per 3 Months
Perfluorooctane sulfonamide (FOSA)	Report	1 per 3 Months
4:2 Fluorotelomer sulfonic acid (4:2 FTSA)	Report	1 per 3 Months
6:2 Fluorotelomer sulfonic acid (6:2 FTSA)	Report	1 per 3 Months
8:2 Fluorotelomer sulfonic acid (8:2 FTSA)	Report	1 per 3 Months
N-Ethyl perfluorooctane sulfonamidoacetic acid (EtFOSAA)	Report	1 per 3 Months
N-Methyl perfluorooctane sulfonamide (N-MeFOSA)	Report	1 per 3 Months

March 5, 2020

Permit No.: 913-94645-IU

SECTION C: PROHIBITION FOR DILUTION OR DILUTION IN LIEU OF TREATMENT

Except where expressly authorized to do so by an applicable pretreatment standard or requirement, no user shall increase the use of process water, or in any way dilute or attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the national categorical pretreatment standards, or in any other pollutant specific limitation or requirement imposed by the City of Detroit, the State of Michigan, or the GLWA.

SECTION D: REPRESENTATIVE SAMPLING REQUIREMENT

All wastewater sampling performed by the permittee shall be collected in a manner and form intended to represent the wastewater discharged by the permittee.

The permittee shall perform Flow-Proportional Composite sampling.

SECTION E: <u>APPLICABLE LIMITS ON RATE AND TIME OF DISCHARGE & FLOW</u> REGULATION

- 1) The permittee is authorized to discharge wastewater regulated under this permit which has been given treatment or equivalent treatment in accordance with the representations made by the permittee. Based upon information filed with the GLWA, the following rate and time of discharge conditions and restrictions apply.
 - a) Days/Hours of Operation: 18 hours per day, 6 days/week (Monday Saturday)
 - b) Daily Rate Limits: The total volume discharged shall not exceed 125,000*

per day of process wastewater

- c) Type of Discharge: [x] Batch [] Continuous
- d) Special Requirement : Discharge must start between 9:00 a.m. to 1:00 p.m. for each discharge day.
- * To accommodate the non-routine volume increases the GLWA has determined that Temporary Daily Maximum Volume Limitation increases can be allowed up to a maximum of 180,000 gallons per day. To ensure compliance with the Wastewater Discharge Permit and related regulations the following conditions must be met:
 - i) The Company must give notice to the GLWA at least 24 hours prior to commencing discharge. The notice will include:
 - a) Initial waste profile sample results that demonstrate that the material qualifies under 40 CFR Part 437.26 Subpart B (Oily Wastes).
 - b) Projected volume of project.
 - c) Projected duration of Temporary Daily Maximum Volume Limitation increase required.
 - ii) During the duration of the Temporary Daily Maximum Volume Limitation increase the Company will sample daily and analyze its discharge for the permitted parameters as contained in Wastewater Permit No.: 913-94645-IU.
 - iii) The Company will submit a summary report containing the compliance data within 30 days of the Temporary Daily Maximum Volume Limitation increase end date.

Permit No.: 913-94645-IU

Note: During the period of the Temporary Daily Maximum Volume Limitation increase all other permit conditions and regulations apply.

- 2) The permittee shall maintain the following records and information in support of all types of discharge in hard-copy or electronic form, and permit this information to be available to the GLWA's representative upon request. At a minimum, the permittee shall maintain a record of (i) the date of discharge, and the (ii) volume of wastewater discharged.
- 3) For facilities operating less than seven (7) days per week or twenty-four (24) hours per day, the permittee is prohibited from discharging any wastewater regulated under this permit outside of the stated hours or days of operation described in paragraph E.1.
- 4) Discharge authorization may be granted for discharges outside of the stated hours of days of operation described in Section E.1 where the permittee provides at least 72 hours notification to the Department and receives prior written authorization from the GLWA for the proposed discharge.

SECTION F: SELF-MONITORING CONDITIONS AND REQUIREMENTS

- The sampling location(s) used for purposes of compliance sampling and reporting is identified in Section B. No alternate locations will be accepted unless approved in writing by the GLWA. Except in emergencies, all requests for an alternate sample location or change in the sampling location shall be submitted in writing at least thirty (30) days prior to the proposed date of change.
- 2) In accordance with 40 CFR 403.12(g)(3), the GLWA, as the authorized agent of the Control Authority, shall require the frequency of monitoring necessary to assess and assure compliance by the permittee. The minimum sampling frequency for each pollutant parameter described in Section B has been established based on (a) an evaluation of compliance history; (b) volume of process wastewater discharged to the sewer; (c) reported discharge frequency (if other than daily); and other information submitted in your permit application (or re-application), or from prior reports or inspections.
- 3) The specific pollutant parameters, which are to be monitored for purposes of compliance sampling and reporting, are identified in Section B.
 - a) A flow proportional composite sample shall be collected and analyzed for all parameters as specified Section B, except for Fats, Oil or Grease (FOG), Cyanide (total, available, or amenable), PFAS, pH, Total Phenols, and the volatile organic compounds included in the TTO list, which shall be collected by one or more grab samples, or as specified in 40 CFR 136. All samples shall be representative of the facility's discharge based on time proportional method
 - b) All samples shall be individually analyzed, reported and compared against the applicable limitations listed in Section B.
 - c) If Section B includes limitations for 4-day, 30-day or monthly average, the appropriate average shall be calculated; compared with the appropriate Section B limitation, and reported with the self-monitoring report.

Permit No.: 913-94645-IU

4) All sampling and analyses conducted for purposes of compliance with the requirements of this Permit, as identified in Section B, must be performed in accordance with the methods and techniques specified in 40 CFR Part 136 and any amendments thereto.

5) All sampling and analyses conducted for purposes of compliance with the requirements of Per and Polyfluoroalkyl Substances, as identified in Section B Table II, must be performed in accordance with EPA method 537 (modified) or ASTM D7979, or other methods approved by USEPA in 40 CFR part 136.

SECTION G: REPORTING, RECORDKEEPING AND NOTIFICATION REQUIREMENTS

- 1) If sampling performed by the permittee indicates a violation of the stated permit limitations, then the permittee shall provide notice and make a demonstration of compliance, which is acceptable to the GLWA and consist of the following minimum requirements:
 - a) Written notification via email to iwc@glwater.org, or notification by telephone to the GLWA's at telephone number (313) 297-5826, within twenty-four (24) hours of becoming aware of the violation.

NOTE: For purposes of this section, when interpreting, "within twenty-four (24) hours of becoming aware" the GLWA shall consider the reasonable time frame which the authorized representative, or their designated authorized representative, actually or should have become aware of the exceedance or violation through due diligence.

- b) A report identifying the suspected or known causes of the violation and any corrective measures taken or planned to prevent future noncompliance.
- c) A demonstration of compliance by collecting and analyzing at least two (2) more individual daily samples.
- d) Submission of the report and two (2) additional analyses to the GLWA within thirty (30) days of becoming aware of the noncompliance.
- Where wastewater(s) are hauled off-site in addition to or in lieu of discharge to the POTW, the permittee shall maintain and provide the following information with their sixmonth report:
 - a) Copies of waste manifest documents.
 - b) Copies of analytical reports for materials sent off-site;
 - c) Flow-meter records and/or water bill records for the six-month period
- 3) The permittee shall maintain the following records and information in support of all types of discharge in hard-copy or electronic form, and permit this information to be available to the GLWA's representative upon request. At a minimum, the permittee shall maintain a record of (i) the date of discharge, and the (ii) volume of wastewater discharged.

Permit No.: 913-94645-IU

SECTION H: SPECIAL USER CHARGES FEES

 Regulatory Oversight Fee – The GLWA will assess an Industrial Waste Control Meter Charge to all commercial and industrial users to recover the costs of regulatory sampling, inspections, enforcement and pretreatment administration through your local community.

2) Surcharges – In compliance with federal regulations, a User Charge Program ("Surcharge Program") has been developed and adopted to assess any additional treatment costs for the discharge of compatible pollutants in excess of domestic strength levels. Currently, the compatible pollutants that have an applicable User Charge are: Biochemical Oxygen Demand 5-day (BOD5), Total Suspended Solids (TSS), Fats Oil or Grease (FOG), and Phosphorous (P). (See DWSD's Surcharge Rules and Regulations).

Your facility is subject to the Surcharge Program subject based on the Waste Strength Determination dated October 20, 2017.

These charges are exclusive of any fines or penalties assessed for noncompliance with the Ordinance or this wastewater discharge permit issued under the Ordinance.

SECTION I: OTHER REQUIREMENTS

- 1) Unless modified by an Administrative Order or Judicial Order, the permittee is required to comply with all conditions, standards, and requirements of this permit. Failure to comply will result in enforcement action.
- 2) Notice of Hazardous Waste As part of its Wastewater Discharge Permit re- application, the permittee shall submit certified notice of any discharge which would be a hazardous waste under 40 CFR §261, in accordance with 40 CFR 403.12(p). The permittee shall update this information as necessary, but no less frequent than every five (5) years.
- 3) Slug Control/Spill Prevention Plan The permittee is required to develop, submit and implement a Slug Control/Spill Prevention Plan (SC/SPP) against accidental discharges to the POTW, in accordance with the City of Detroit Ordinance 08-05.
 - a) The permittee shall review its SC/SPP every two (2) years, or following any substantial change in operation impacting the potential for a slug discharge/spill to the sewer system, or following an implementation event of its SC/SPP, and modify or update the SC/SPP as necessary, submitting all changes to the GLWA.
 - b) The permittee shall comply with the notification and reporting requirements (See General Terms and Conditions).

March 5, 2020

Permit No.: 913-94645-IU

4) Periodic Compliance Report or Six Month Report - The Six Month Report (aka Periodic Compliance Report) must be submitted to the GLWA semi-annually on or before June 30th and December 31st of each year. The report must be submitted in the form prescribed by the GLWA or on an alternative form approved by the GLWA. It must contain the following requirements:

- a) Analytical part (Self-Monitoring Requirements/Wastewater Analyses);
- b) Descriptive part (i.e. facility information, water usage/discharge information, certified statement, certification, etc.)

This report shall be signed and dated by the authorized representative of the Permittee.

SECTION J: <u>SEWERAGE FLOW SYSTEM (CWT ONLY)</u>

- 1) A Sewage Flow System includes a Sewage Flow Meter(s) and non-resettable Totalizer(s) for each Sample Location(s).
- 2) The facility shall perform an annual maintenance evaluation of the sewerage flow system. The facility shall provide the GLWA with its certification attesting the workability/accuracy of the Sewage Flow System and last calibration date during Comprehensive Inspection (CI) or with its December 31st Six Month Report (SMR).
- 3) No discharge shall bypass the Sewage Flow System.
- 4) If the facility's sewerage flow meters malfunction, the facility must notify the GLWA at 313-297-5850 or iwc@glwater.org within forty-eight (48) hours.
- 5) If the facility plans to replace or install a new sewerage flow meter, the GLWA must also be notified prior to replacement or installation of the sewerage flow meter, and given a schedule for completion of the work.
- 6) The facility shall have or record daily flow-rates or volumes which shall be provided to the GLWA and submitted with each Six Month Report or on request of the GLWA.

SECTION K: CENTRALIZED WASTE TREATMENT POINT SOURCE CATEGORY

1) Facility Subpart Designation

a) The permittee qualifies as a Centralized Waste Treatment Facility ("CWT facility"), and is authorized to accept the wastes and wastewater consistent with the applicable Subpart (see below) in accordance with the National Categorical Pretreatment Standards (40 CFR 437), and the local ordinance.

437.26B PSNS, 437 47D(e) PSNS Centralized Waste Treatment Oils Treatment and Recovery

1) Waste and Wastewater Prohibitions

The permittee shall not dispose or discharge to the POTW:

- a) Any waste or wastewater not identified in the permit application;
- b) Any waste or wastewater from any Centralized Waste Treatment facility subparts not authorized above;

March 5, 2020

Permit No.: 913-94645-IU

c) Any mixed or mixtures of waste or wastewater from any Centralized Waste Treatment facility subparts not authorized above;

d) Any waste or wastewater containing PCBs (Polychlorinated Biphenyls).

SECTION L: WASTEWATER ACCEPTANCE REQUIREMENTS

- 1) The CWT facility shall maintain onsite wastewater acceptance procedures (paperwork and analyses) that are adequate and:
 - a) Describes the general nature, source and processes generating the waste or wastewater:
 - b) Identifies the quantity and character of toxic pollutants known or suspected to be present in the waste or wastewater;
 - c) Describes that the waste or wastewater is acceptable for the treatment, or equivalent treatment provided by the CWT facility, in accordance with the subpart designation in Section K.
- 2) The CWT facility has provided written documentation that it has developed, adopted and is implementing its wastewater acceptance procedures and that they are available on-site for review. The CWT facility shall submit a new written statement with its next wastewater discharge permit application or re-application. The statement shall be signed and dated by the authorized representative.
- 3) These wastewater acceptance procedures may include or incorporate the US EPA evaluation guidance criteria and numerical standards included as attachment A.
- 4) Unless the wastewater acceptance procedures are deemed inadequate by the GLWA in writing, the CWT facility's wastewater acceptance procedures shall be implemented as written.
- 5) The permittee shall provide the GLWA with access to waste manifests, and/or other bills of lading for all incoming materials, and any analytical information available and/or used in support of the accepted waste, upon the request of GLWA.

If immediate access is not feasible, then the permittee shall provide written notice within seven (7) days of the GLWA's request, (i) providing access to the documents or (ii) supply copies in either hard copy or electronic format. The information shall be made available to GLWA within thirty (30) days of the permittee's written notice.

SECTION M: INITIAL AND PERIODIC CERTIFICATION STATEMENTS (SUBPART D - ONLY)

As part of its wastewater discharge permit re-application, the permittee shall provide written certification that it has submitted the information required by 40 CFR 437.41 as its Initial Certification Statement, or as modified and described by subsequently submitted Periodic Certifications. The permittee shall submit a Periodic Certification Statement annually, due on or before December 31st of each year, which:

March 5, 2020

Permit No.: 913-94645-IU

1. Shall certify that the CWT facility is operating its treatment system(s) to provide equivalent treatment as set forth in its Initial Certification, or as modified and described by subsequently submitted Periodic Certifications. The Periodic Certification Statement must include the information specified in 40 CFR 437.41(a)(1-3);

- 2. Shall submit a description of any modifications made to the CWT facility and include or make available, supporting information needed to establish equivalent treatment.
- 3. Shall be signed and dated by the Permittee's Authorized Representative.

SECTION N: ON-SITE COMPLIANCE PAPERWORK (SUBPART D - ONLY)

In addition to the record-keeping requirements enumerated in 40 CFR 403.12(o), and in accordance with 40 CFR 437.41(c), the permittee shall retain and make available to the Control GLWA "On-site Compliance Paperwork" as specified in 40 CFR 437.41(c) (1-5), which supports the initial and periodic certification statements. This paperwork must:

- 1) List and describe the subcategory wastes being accepted for treatment at the facility;
- 2) List and describe the treatment system(s) in-place at the CWT facility, any modifications to the treatment systems and the conditions under which the systems are operated for the subcategories of wastes accepted for treatment at the CWT facility;
- 3) Provide information and supporting data establishing that these treatment systems will achieve equivalent treatment;
- 4) Describe the procedures it follows to ensure that its treatment systems are well operated and maintained; and
- 5) Explain why the procedures it has adopted will ensure its treatment systems are well-operated and maintained.
- 6) All users granted a permit from the department shall maintain records which, at a minimum, identify the source, volume, character, and constituents of the wastewater accepted for treatment and disposal. These records may be reviewed at any time by the department.
- 7) Upon written request from the GLWA Industrial Waste Control Division, the CWT shall provide information requested by the department including, but not limited to the information enumerated by section 56-3-59.1(f)(1-6), of the City of Detroit Ordinance 08-05.

This information shall be maintained by the permittee in either a hard-copy or electronic format and shall be available and accessible to the GLWA upon request. Select appropriate conditions to specific SIU.

The GLWA may request copies or print-outs of this information.

Permit No.: 913-94645-IU

Section O: PFAS SUBSTANCES TERMS AND CONDITIONS

The permittee has stated that they will not receive wastes and wastewater containing Per and Polyfluoroalkyl Substances (PFAS). The following requirements apply:

- 1. <u>BEST MANAGEMENT PLAN:</u> The permittee has developed and shall maintain and implement its Wastewater Treatment Plant PFAS Best Management Plan (BMP) dated March 28, 2019, and as may be amended.
 - a. The permittee will review its BMP at least annually and update it as necessary to demonstrate its continuing efforts to reduce, eliminate and control contributions of PFAS Compounds in its wastewater discharge.
 - b. GLWA may inspect the facility's BMP program activities and request copies of the current BMP and any records and information as part of any on-site inspection.
- 2. Waste and Wastewater Characterization The permittee has implemented a screening program for identifying and evaluating PFAS compound in waste and wastewater so as not to accept these materials for processing. This plan includes methods used for evaluating (fingerprinting) and characterizing wastes and wastewaters prior to being accepted. At a minimum, the characterization of wastes and wastewaters shall be based on data collected during the last 2 years. The permittee's waste analysis plan and made available for onsite review by GLWA during an on-site inspection.
- 3. Chemical Inventory Report The permittee shall review its chemical and materials inventory, at least annually, for the presence of PFAS Compounds.
- 4. The permittee shall implement a self-monitoring program in accordance with Section B, Table II of this permit. The permittee may request an alternate sampling frequency 12 months after the issuance of a final Wastewater Discharge Permit. GLWA will review and provide a written response to any request.
- 5. Notification Requirements for PFAS Compounds: The GLWA has not established Local Pollutant Discharge Limitations at this time, however should the results of PFOS or PFOA exceed the interim Compliance Standard of 60 ng/l (for PFOS) and/or 2,300 ng/l (for PFOA), the permittee shall notify GLWA by written notification, email to iwc@glwater.org, or notification by telephone to the GLWA's at telephone number (313) 297-5826, within twenty-four (24) hours of becoming aware of the exceedance.
 - a. NOTE: For purposes of this section, when interpreting, "within twenty-four (24) hours of becoming aware" the GLWA shall consider the reasonable time frame which the authorized representative, or their designated authorized representative, actually or should have become aware of the exceedance through due diligence.
 - b. The permittee is <u>not</u> required to conduct resampling for PFAS compounds following such notification.
- 6. The permittee shall develop and maintain records of the source, volume, and any PFAS characterization data collected for specific wastes and wastewaters. The permittee shall maintain this information for onsite inspection by the GLWA.

March 5, 2020

Permit No.: 913-94645-IU

7. Should the permitee elect to accept and process PFAS containing material for discharge, a prior request must be submitted to and approved by the GLWA. At a minimum, the request will contain the following: details of an installed waste treatment system capable of removing PFAS substances, demonstration of PFAS removal efficiency to levels at or below the compliance standards. Such notice shall be provided at least 30 days prior to receipt.

- 8. Upon acceptance of the pollution prevention plan initiatives or BMP and compliance with these permit conditions described above, as continued compliance with all permit and ordinance requirements relating to PFAS Substances, including but not limited to the general prohibition against pass-through.
- 9. GLWA may inspect the facility's BMP program activities and request copies of records and information as part of any on-site inspection.
- 10. The permittee shall continue to develop, maintain and implement its PFAS screening program. The permittee shall review and evaluate the results of its program. The review will demonstrate the effectiveness and evaluate if modification is necessary to reduce/eliminate PFAS discharge levels to meet the GLWA PFAS compliance standards.
- 11. The permittee shall include a periodic report with each Six Month Report (June/December of each year) of its progress in reducing, eliminating and controlling PFAS Compounds discharged from its facility, and shall provide a summary of analytical results, changes or revisions to its BMP. Supporting documentation including laboratory analytical reports and other records shall be included or made available to GLWA.

March 5, 2020

Permit No.: 913-94645-IU

PART II: GENERAL TERMS AND CONDITIONS

SECTION A: GENERAL PROHIBITIONS

No user shall discharge or cause to be discharged into the POTW, directly or indirectly, any pollutant or wastewater which will cause interference or pass through. It shall be unlawful for a user to discharge into the POTW:

- 1) Any liquid, solid or gas, which by reason of its nature or quantity, is sufficient either alone or by interaction with other substances to create a fire or explosion hazard or to be injurious in any other way to persons, to the POTW, or to the operations of the POTW. Pollutants, which create a fire or explosion hazard in a POTW, include, but are not limited to, wastestreams with a closed cup flash point of less than 140°F or 60°C using the test methods specified in 40 C.F.R. § 261.21; or
- 2) Any solid or viscous substance in concentrations or quantities, which are sufficient to cause obstruction to the flow in a sewer or other encumbrances to the operation of the POTW, including, but not limited to, grease, animal guts or tissues, bones, hair, hides or fleshing, entrails, whole blood, feathers, ashes, cinders, sand, cement, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, strings, fibers, spent grains, spent hops, wastepaper, wood, plastics, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud or glass grinding or polishing wastes, or tumbling and deburring stones; or
- 3) Any wastewater containing petroleum oil, non-biodegradable cutting oil, products of mineral oil origin, or toxic pollutants in sufficient concentration or quantity either singly or by interaction with other pollutants to cause interference, or pass through, or constitute a hazard to humans or animals; or
- 4) Any liquid, gas, solid or form of energy, which either singly or by interaction with other waste is sufficient to create toxic gas, vapor, or fume within the POTW in quantities that may cause acute worker health and safety problems, or may cause a public nuisance or hazard to life, or are sufficient to prevent entry into the sewers for their maintenance and repair; or
- 5) Any substance which is sufficient to cause the POTW's effluent or any other product of the POTW, such as residue, sludge, or scum to be unsuitable for reclamation processing where the POTW is pursuing a reuse and reclamation program. In no case shall a substance discharged into the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria guidelines or regulations developed under 33 U.S.C. § 1345, with any criteria, guidelines, or developed and promulgated regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Federal Clean Air Act, the Federal Toxic Substances Control Act, or with state criteria applicable to the sludge management method being used; or
- 6) Any substance which will cause the POTW to violate either the Consent Judgment in U.S. EPA v City of Detroit et al, Federal District Court for the Eastern District of Michigan Case No. 77-1100, or the City's National Pollutant Discharge Elimination System permit; or
- 7) Any discharge having a color uncharacteristic of the wastewater being discharged; or

March 5, 2020

Permit No.: 913-94645-IU

8) Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at the introduction into a public sewer which exceeds 150°F or which will cause the influent at the wastewater treatment plant to rise above 104°F (40°C); or

- 9) Any pollutant discharge which constitutes a slug; or
- 10) Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established in compliance with applicable federal or state regulations; or
- 11) Any floating fats, oil or grease which are sufficient to cause interference with or pass through the POTW; or
- 12) Any solid materials having a specific gravity greater than 1.2 or a cross section dimension of one-half (½) inch or greater which are sufficient to cause interference with the POTW.

Permit No.: 913-94645-IU

SECTION B: GENERAL TERMS AND CONDITIONS

The Permittee is authorized to discharge industrial wastewater to the GLWA's sewer system in compliance with the City of Detroit Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

- 1) Records for monitoring activities shall be maintained in accordance with ordinance requirements and shall include the following information for all samples:
 - a) The date, time, exact place and method of sampling
 - b) The names of persons taking the sample
 - c) The technique or method of analysis, the date and results of analysis
 - d) The names of person performing the analysis
- 2) **Notification and Reporting Requirements** The following telephone contact numbers are available for providing notice to the GLWA:

To report Spills, Upsets, Bypasses or Environmental emergencies: 24-hour

Numbers:

Systems Control Center

(313) 267-6000

Water Resource Recovery Facility

(313) 297-0322 or 297-0326

Non-emergency Number:

Industrial Waste Control Office

(313) 297-5857 iwc@glwater.org

- a) Sampling Violations (Self-Monitoring) Within twenty-four (24) hours of becoming aware of a violation, the IU shall notify GLWA by telephone at (313) 297-5826 or by email at Notice.iwc@glwater.org.
- b) Slug Loading / Accidental Discharge Within one (1) hour of becoming aware of a discharge entering into the sewer system which exceeds or does not conform with federal, state or City of Detroit laws, regulations or the permit requirements, the Permittee shall telephone the GLWA at the Systems Control Center and inform the GLWA about the details of the discharge.
- c) Upset at the IU's Pretreatment Facility Within twenty-four (24) hours of becoming aware of an upset, the IU shall telephone GLWA at the System Control Center and inform the GLWA about the details of the upset and discharge.
- d) Bypass Events are prohibited, unless the permittee demonstrates that:
 - The bypass was unavoidable to prevent loss of life, personal injury or severe property damage;
 - ii) There was no feasible alternative to the bypass;
 - iii) The permittee notifies the GLWA of the bypass event:

Permit No.: 913-94645-IU

(1) Unanticipated Bypass - Within twenty-four (24) hours of becoming aware of the bypass, IU shall telephone the GLWA at the System Control Center and inform the GLWA about the details of the discharge.

- (2) **Anticipated Bypass** If an IU anticipates the need for a bypass, prior notice shall be submitted to the GLWA at least ten (10) days before the date of bypass. The report shall be accompanied by analytical data, if available, which shows the characteristics of the material to be bypassed. Upon evaluation, the GLWA will provide the IU with its determination on the bypass.
- e) <u>Submission of Report -</u> For the incidents b, c, or d, a written report shall be submitted to the GLWA within five (5) calendar days of becoming aware of the incident. This report shall contain the following information:
 - i) A description of the discharge and the cause of the incident;
 - ii) The duration of the incident including exact dates and times or, if not corrected, the anticipated time the incident is expected to continue;
 - iii) Steps being taken and/or planned to reduce, eliminate and prevent future occurrences of a similar incident.

The IU may also have certain notification requirements under applicable federal regulations, including but not limited to 40 CFR Part 403.

- 3) Limitations on Permit Transfer The wastewater discharge permit shall not be reassigned or transferred without the written approval of the GLWA and provision of a copy to the new owner or operator. The permittee shall notify the GLWA of any such changes at least thirty (30) days prior to the change.
- 4) **Duty to Provide Notice of Material or Substantive Change** The permittee shall notify the GLWA of any material or substantial change to the facility, its operations, or changes in the characteristics of the Permittee's effluent, including but not limited to the method, frequency or volume of discharge, within thirty (30) days of the change.
- 5) Confidential Information Except for data accepted as confidential under the ordinance, all information and data regarding the permittee obtained from written reports, questionnaires, permit applications, permits, monitoring programs and inspections shall be available to the public or other government agencies without restriction. If a permittee submits information claimed to be Confidential Information it must be clearly marked "Confidential". The GLWA shall make a determination in accordance with 56-3-64.1.

6) Legal Actions

Any user who violates any local provision, including the failure to pay any fees, charges, or surcharges imposed hereby, or any condition or limitation of a permit issued pursuant thereto or who knowingly makes any false statements, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to this ordinance or wastewater discharge permit or who tampers with, or knowingly renders inaccurate any monitoring device required under this ordinance is guilty of a misdemeanor and shall, upon conviction, be punished by a fine not to exceed \$500 for each violation per day or by imprisonment for not more than ninety

Permit No.: 913-94645-IU

(90) days or by both. The GLWA is hereby authorized to seek, through its counsel, prosecution of criminal charges against any person violating any provision of this ordinance.

- b) If any person discharges sewage, industrial wastes, or other wastes into the POTW contrary to the provisions of the ordinance, permit or order issued thereunder, the Director or Board may commence a civil action to enjoin such discharge or to enforce compliance with this ordinance, permit or order issued thereunder, in the Circuit Court for the County of Wayne or other appropriate court. Upon a proper showing of a violation of this ordinance, permit or order issued thereunder, a permanent or temporary injunction may be granted without bond. The GLWA or Board may also seek additional legal and/or equitable relief. Instituting suit in the Circuit Court does not constitute as exclusive election of remedies and does not prohibit the GLWA, Director, Board, or City of Detroit from commencing action in Federal Court for discharges believed to be in violation of this ordinance, State and Federal requirements pursuant to the Clean Water Act, the NPDES permit, or other applicable laws or requirements. The GLWA may also recover reasonable attorney fees, court costs, court reporters fees, and other unusual expenses related to enforcement activities or litigation against the person found to have violated this ordinance or the orders, rules, regulations, and permits issued hereunder.
- c) All fines, costs and penalties which are imposed by any court of competent jurisdiction shall be payable to the clerk of such court, who shall deposit the same with the City Treasurer, all of which fines, costs, and penalties shall be credited to the appropriate fund of the GLWA.

7) All reports shall be addressed to:

Great Lakes Water Authority Industrial Waste Control Division, 9300 West Jefferson Suite 210 Detroit, Michigan 48209

- 8) Requirement to Reapply This permit shall expire on the expiration date identified. Existing permittees shall apply for permit reissuance a minimum of ninety (90) days prior to the expiration of existing permits on a form prescribed by the GLWA. Upon timely application for reissuance of a permit, the expired permit shall be automatically extended until modified or reissued by the GLWA. Failure to submit a timely reapplication for reissuance may result in a delayed issuance of a permit and a cessation of unpermitted discharges to the sewer system.
- 9) Records Retention The permittee shall maintain records of all information from monitoring activities, permit requirements, or 40 CFR 403.12 for no less than three years.
- 10) Operation and Maintenance of Pretreatment Facilities The permittee shall operate and maintain any and all pretreatment facilities in a prudent and professional manner. Records of operation and maintenance shall be provided to the GLWA for review, upon request.

Permit No.: 913-94645-IU

11) Right of Entry - The GLWA's employees or authorized representative shall have ready access to the Permittee's premises to engage in inspection, sampling, compliance monitoring and/or metering activities. Each such activity shall be commenced and completed at reasonable times, and in a reasonable manner. It is the permittees' responsibility to make prompt and necessary arrangements so that upon presentation of appropriate credentials, personnel from the GLWA will be permitted to enter immediately for the purposes of performing their specific responsibilities.

Denial of access to any authorized GLWA representative shall result in enforcement action.

- 12) **Permit Modification** The terms and conditions of this permit are subject to modification during the term of the permit in accordance with the City of Detroit Ordinance 08-05 Sec. 56-3-61.1 (g)(1-12).
- 13) **Permit Revocation** The GLWA may revoke this permit at any time in accordance with applicable law. Actions for which a permit may be revoked include, but are not limited to, failure of a Permittee to comply with the permit, failure to comply with an administrative order, or court order, discharging wastewater which has the potential to or does threaten the POTW or the community, discharges which would cause the POTW to violate its NPDES permit.

Where such action is taken by the GLWA, the former permittee shall have an opportunity for a hearing for permit reinstatement in accordance with applicable law.

- 14) **Mercury and Total PCB compliance** shall be based upon compliance with section 56-3-59.1(b)(2) of the Detroit City Code:
 - a) The limitation for Total PCB is Non-detect. Total PCB shall not be discharged at detectable levels, based upon U.S. EPA Method 608.3, and the quantification level shall not exceed 0.2 μ g/l, unless a higher level is appropriate because of demonstrated sample matrix interference.
 - b) The Limitation for Mercury (Hg) is Non-detect. Mercury (Hg) shall not be discharged at detectable levels, based upon U.S. EPA Method 245.1, and the quantification level shall not exceed 0.2 µg/l, unless a higher level is appropriate because of demonstrated sample matrix interference.

Permit No.: 913-94645-IU

SECTION C: <u>DEFINITIONS AND REQUIREMENTS</u>

- 4-DAY Average Limitation is the highest allowable mass or concentration standard of discharges over four (4) consecutive, independent daily sampling events. Compliance with this limitation is calculated as the summation of individual daily discharge, measurements for a parameter taken during four (4) consecutive daily sampling events divided by four (4). The four (4) consecutive sampling events need not occur on consecutive calendar days.
- 2. <u>30-DAY Average Limitation</u> is the summation of individual daily measurements for a parameter during a thirty (30) consecutive calendar day period, divided by the number of individual measurements for that parameter taken during that thirty (30) day period. The recommended minimum number of samples (1 set) required to demonstrate compliance are ten (10) independent daily samples.
- 3. <u>Authorized Representative</u> means the person defined in section 56-3-58.1(a) of the Detroit City Code, or the person designated as a duly authorized representative made in conformance with section 56-3-59.1(n) of the Detroit City Code.
- 4. <u>Authority</u> means the Great Lakes Water Authority, and authorized employees of the GLWA. See also Control Authority.
- 5. Available Cyanide means the quantity of cyanide that consists of cyanide ion (AVCN); hydrogen cyanide in water (HAVCNaq); and the cyano-complexes of zinc, copper, cadmium, mercury, nickel, and silver, determined by EPA method OIA-1677, or other method designated as a Standard Method or approved under 40 CFR Part 136.
- 6. **Batch Discharge** A non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration or frequency of generation warrant periodic releases as the most efficient and effective means of discharge.
- 7. Best Management Practices (BMP) means programs, practices, procedures or other directed efforts, initiated and implemented by a User, which can or does lead to the reduction, conservation or minimization of pollutants being introduced into the ecosystem, including but not limited to the Detroit sewer system. BMPs include, but are not limited to, equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control, and may include technical and economic considerations.
- 8. <u>Continuous Discharge</u> means a "discharge" which occurs without interruption throughout the operating hours of the Permittee, except for infrequent shutdowns for maintenance, process changes, or other similar activities.
- Control Authority means the Detroit Water and Sewerage Department, or its agent Great Lakes Water Authority, which have been officially designated as such by the Michigan Department of Environmental Quality under the provisions of 40 CFR 403.11, 40 CFR 403.9, and 40 CFR 403.12.
- 10. **<u>Daily Maximum Limitation</u>** is the maximum allowable discharge of pollutant on a single calendar day.

Permit No.: 913-94645-IU

- 11. <u>Intermittent Batch Discharge</u> A non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration or frequency of generation warrant periodic releases as the most efficient and effective means of discharge. Batch discharges are classified as intermittent when there is a period of more than thirty (30) days between batch discharges.
- 12. <u>Monthly Average Limitation</u> is the summation of individual daily measurements for a parameter during a calendar month, divided by the number of individual measurements for that parameter taken during that month. The recommended minimum number of samples (1 set) required to demonstrate compliance are ten (10) independent daily samples.
- 13. <u>Permittee</u> means the Company Name in Section A of this Wastewater Discharge Permit. As used within this Wastewater Discharge Permit, it also means the Industrial User, or User.
- 14. <u>PFAS Substances</u> means the list of perfluoroalkyl and polyfluoroalkyl substances that the MDEQ has identified as emerging contaminants; which includes:

Perfluorotetradecanoic acid (PFTA) Perfluorononanesulfonic acid (PFNS) (PFOS) Perfluorotridecanoic acid (PFTrDA) Perfluorooctanesulfonic acid Perfluorododecanoic acid Perfluoroheptanesulfonic acid (PFHpS) (PFDoA) Perfluorohexanesulfonic acid Perfluoroundecanoic acid (PFUnA) (PFHxS) (PFPeS) Perfluorodecanoic acid (PFDA) Perfluoropentanesulfonic acid Perfluorononanoic acid (PFNA) Perfluorobutanesulfonic acid (PFBS) Perfluorooctanesulfonamide (PFOSA) Perfluorooctanoic acid (PFOA) (PFHpA) Fluorotelomer sulphonic acid 8:2 (FtS 8:2) Perfluoroheptanoic acid (PFHxA) Fluorotelomer sulphonic acid 6:2 (FtS 6:2) Perfluorohexanoic acid (PFPeA) Fluorotelomer sulphonic acid 4:2 (FtS 4:2) Perfluoropentanoic acid 2-(N-Ethylperfluorooctanesulfonamido) acetic Perfluorobutanoic acid (PFBA) (NEtFOSAA) 2-(N-Methylperfluorooctanesulfonamido) Perfluorodecanesulfonic acid (PFDS) (NMeFOSAA) acetic acid

or as amended

- 15. <u>Publicly Owned Treatment Works (POTW)</u> means a treatment works as defined by 33§ 1292(2)(A) which is owned **or operated**, by a state or municipality, as defined in 33 U.S.C. § 1362, including:
 - Any devices and systems used in the storage, treatment, recycling, or reclamation of municipal sewage or industrial wastes of a liquid nature; or
 - b. Sewers, pipes and other conveyances only if they convey wastewater to a POTW treatment plant; or
 - c. The municipality, as defined in 33 U.S.C. § 1362, which has jurisdiction over the indirect discharges to and the discharges from such a treatment works.

Permit No.: 913-94645-IU

- 16. Quantification Level means the measurement of the concentration of a contaminant obtained by using a specified laboratory procedure calculated at a specified concentration above the detection level. It is considered the lowest concentration at which a particular contaminant can be quantitatively measured using a specified laboratory procedure for monitoring of the contaminant.
- 17. <u>Total PCB</u> means the sum of the individual analytical results for each of the PCB aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260 during any single sampling event with any aroclor result less than the quantification level being treated as zero.
- 18. <u>Total Phenolic Compounds</u> means the sum of the individual analytical results for each of the phenolic compounds of 2-chlorophenol, 4-chlorophenol, 4-chloro-3-methylphenol, 2,4-dichlorophenol, 2,4-dinitrophenol, 4-methylphenol, 4-nitrophenol, and phenol during any single sampling event expressed in mg/l.
- 19. <u>Total Toxic Organics (TTO)</u> is the summation of all quantifiable values greater than 0.01 mg/l for the listed toxic organics. TTO requirement shall be as follows:
 - a) All parameters shall be analyzed in accordance to 40 CFR Part 136 methods. Usage of approved analytical procedures is essential to the detection of parameters being analyzed. All MDLs should be reported with the sample results, and any cleanup procedures and sample interference shall be reported.
 - b) In lieu of monitoring for TTO, facilities subject to either 40 CFR Part 413 or Part 433 may be allowed to make the TTO certification as a comment to the Six Month Report, provided:
 - i. At least one (1) complete set of analytical results has been submitted for all the TTO pollutants of concern, and
 - ii. The Permittee has submitted a Toxic Organic Management Plan (TOMP) in compliance with either 40 CFR Part 413 or 433 requirements, and
 - iii. The TOMP has been approved by the GLWA.
- 20. <u>Total Metals</u> is the sum of the concentration of Copper (Cu), Nickel (Ni), Chromium (Cr) and Zinc (Zn).

Permit No.: 913-94645-IU

Attachment A – EPA Waste Acceptance Guidance

If the CWT facility receives the wastes listed in the waste classification table, the subcategory determination may be made solely from this information. For purposes of this rule, the CWT facility need not determine the percentage of each type of waste within a subcategory or between subcategories. The CWT facility only needs to determine what subcategory the wastes fall into: one or multiple subcategories.

Table - Waste Receipt Classification

Table – Waste Receipt	Classification
Metals Subcategory	-spent electroplating baths and/or sludges
	-metal finishing rinse water and sludges
	-chromate wastes
	–air pollution control blow down water and sludges
	-spent anodizing solutions
	-incineration wastewaters
	-waste liquid mercury
	-cyanide-containing wastes
	-waste acids and bases with or without metals
	-cleaning, rinsing, and surface preparation solutions from electroplating or phosphating operations
	-vibratory deburring wastewater
	-alkaline and acid solutions used to clean metal parts or equipment
Oils Subcategory	-used oils
	-oil-water emulsions or mixtures
	-oil-water emulsions or mixtures -lubricants
	-lubricants
	-lubricants -coolants
	-lubricants -coolants -contaminated groundwater clean-up from petroleum sources
	-lubricants -coolants -contaminated groundwater clean-up from petroleum sources -used petroleum products
	-lubricants -coolants -contaminated groundwater clean-up from petroleum sources -used petroleum products -oil spill clean-up
	-lubricants -coolants -contaminated groundwater clean-up from petroleum sources -used petroleum products -oil spill clean-up -bilge water
	-lubricants -coolants -contaminated groundwater clean-up from petroleum sources -used petroleum products -oil spill clean-up -bilge water -rinse/wash waters from petroleum sources
	-lubricants -coolants -contaminated groundwater clean-up from petroleum sources -used petroleum products -oil spill clean-up -bilge water -rinse/wash waters from petroleum sources -interceptor wastes
	-lubricants -coolants -contaminated groundwater clean-up from petroleum sources -used petroleum products -oil spill clean-up -bilge water -rinse/wash waters from petroleum sources -interceptor wastes -off-specification fuels

March 5, 2020

Permit No.: 913-94645-IU

	–non-contact used glycols–aqueous and oil mixtures from parts cleaning operations
	-wastewater from oil bearing paint washes
Organics	-landfill leachate
Subcategory	-contaminated groundwater clean-up from non-petroleum sources
	-solvent-bearing wastes
	-off-specification organic product
	-still bottoms
	-byproduct waste glycol
	-wastewater from paint washes
	-wastewater from adhesives and/or epoxies formulation
	-wastewater from organic chemical product operations
	-tank clean-out from organic, non-petroleum sources

Waste Characterization Using Numerical Criteria

For wastestreams that are from non-specific sources or not listed in the waste receipt classification table, the facility should additionally complete the following steps. The facility should use data collected during the waste acceptance procedures to classify the waste into the appropriate subcategory. EPA recommends the CWT facility apply the following hierarchy:

- 1. If the waste receipt contains oil and grease at or in excess of 100 mg/L, the waste receipt should be classified in the oils subcategory;
- 2. If the waste receipt contains oil and grease <100 mg/L, and has any of the pollutants listed below in concentrations in excess of the values listed below, the waste receipt should be classified in the metals subcategory.

 Cadmium
 0.2 mg/L

 Chromium
 8.9 mg/L

 Copper
 4.9 mg/L

 Nickel
 37.5 mg/L

3. If the waste receipt contains oil and grease <100 mg/L and does not have concentrations of cadmium, chromium, copper, or nickel above any of the values listed above, the waste receipt should be classified in the organics subcategory.

Permit No.: 913-94645-IU

ATTACHMENT B - OPERATING DAY LOG FORM

Days ➡ Month Year ➡							
	1	2	3	4	5	9	7
	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency
	Sampled	Sampled	Sampled	Sampled	Sampled	Sampled	Sampled
	# Batch	# Batch	# Batch				
	Volume	Volume	Volume	Volume	Volume	Volume	Volume
	8	6	10	11	12	13	14
	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency
	Operated	Operated	Operated	Operated	Operated	Operated	Operated
	Discharged	Discharged	Discharged	Discharged	Discharged	Discharged	Discharged
	# Batch Volume	# Batch Volume	# Batch	# Batch Volume	# Batch Volume	# Batch Volume	# Batch
	15	16	17	18	19	20	21
	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency
	Operated Sampled	Operated Sampled	Operated Sampled				
	☐ Discharged # Batch	☐ Discharged # Batch	Discharged # Batch	☐ Discharged # Batch	☐ Discharged # Batch	☐ Discharged # Batch	Discharged
	Volume	Volume	Volume	Volume	Volume	Volume	Volume
	22	23	24	25	26	27	28
	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency	Frequency
	Operated	Operated	Operated	Operated	Operated	Operated	Operated
	Discharged	Discharged	Discharged	Discharged	Discharged	Discharged	Discharged
	# Batch	# Batch	# Batch				
	Volume	Volume	Volume	Volume	Volume	Volume	Volume
	29	30	31				
	Frequency	Frequency	Frequency				
	Operated Sampled	Operated Sampled	Operated Sampled				
	☐ Discharged # Batch	☐ Discharged # Batch	☐ Discharged # Batch				
	Volume	Volume	Volume				
AND DESCRIPTION OF THE PERSON NAMED IN	-				A STATE OF THE PERSON NAMED IN COLUMN	A STATE OF THE PARTY OF THE PAR	

Month/Year: _____ Facility: _____

Permit No.: 913-94645-IU

1. FACILITY DESCRIPTION

Aevitas Specialty Services Corporation is a Centralized Waste Treatment (CWT) facility that treats oily wastewater. The facility normally operates 12-18 hours per day (2 shifts), 5 to 6 days per week, with about 20 employees.

2. PROCESS DESCRIPTION

Aevitas Specialty Services Corporation receives and treats oily wastewater. The followings describe briefly the treatment operations conducted at the facility:

The oily waste is received in one of six tanks (TF-1), where it is first heated and chemically treated to accelerate the oil/water separation. Separated oily wastewater from oily waste treatment and oily wastewater received from customers pumped into one of the wastewater treatment tanks (Tanks 51-56). Wastewater treatment involves heating the wastewater to approximately 160°F and adding caustic or sulfuric acid for adjusting pH between 5 and 9 to separate the oil from the water. Oil is removed by gravity separation and is collected in sludge processor. Polymer flocculants and coagulants are used to agglomerate small particles into larger particles. Large particles float to the surface and are collected with oil in the sludge processor. The pretreated water at top of the tank is pumped to the final discharge tank for discharge.

Flow Proportional Sampling is required.

Discharge Volume Limitation

Aevitas Specialty Services Corporation discharges an average of 55,000 gallons per day (gpd) of process wastewater. A Daily Maximum Volume Limitation of 125,000 gpd has been imposed. As the Company occasionally accepts large volume contracts which would violate the Daily Maximum Volume Limitation if the treated material were to be discharged.

In order to maintain compliance, with the Daily Maximum Volume Limitation, Aevitas Specialty Services Corporation has requested a significant increase in the permitted discharge volume (~200,000 gallons per day).

As such, the Great Lakes Water Authority (GLWA) has requested a Treatment Study where by Aevitas Specialty Services Corporation demonstrated its treatment capacity with estimates on volume and time.

The treatment study was submitted on August 4, 2016 demonstrating the treatment efficiency and treatment times for material at varying concentrations of FOG. The company has demonstrated that treatment times are between 2.5 hours and 0.5 hours per batch. To accommodate the non-routine volume increases the GLWA has determined that Temporary Daily Maximum Volume Limitation increases can be allowed up to a maximum of 180,000 gallons per day. To ensure compliance with the Wastewater Discharge Permit and related regulations the following conditions must be met:

Permit No.: 913-94645-IU

i. The Company must give notice to the GLWA at least 24 hours prior to commencing discharge. The notice will include:

- ii. Initial waste profile sample results that demonstrate that the material qualifies under 40 CFR Part 437.26 Subpart B (Oily Wastes).
- iii. Projected volume of project.
- iv. Projected duration of Temporary Daily Maximum Volume Limitation increase required
- 1) During the duration of the Temporary Daily Maximum Volume Limitation increase the Company will sample daily and analyze its discharge for the permitted parameters as contained in Wastewater Permit No.: 913-94645-IU.
- 2) The Company will submit a summary report containing the compliance data within 30 days of the Temporary Daily Maximum Volume Limitation increase end date.

Note: During the period of the Temporary Daily Maximum Volume Limitation increase all other permit conditions and regulations apply

3. APPLICABLE CLASSIFICATION

Aevitas Specialty Services Corporation is classified as a Categorical Industrial User whose wastewater discharge is subject to the Centralized Waste Treatment Point Source Category, 40 CFR Part 437.26 (B), subpart B-Oily Waste, Pretreatment Standards for New Sources (PSNS). The facility discharges more than 25,000 gpd of process wastewater. The process wastewater contains toxic pollutants and requires pretreatment to comply with specific pollutant limitations prior to discharge into the city sewer.

4. WASTEWATER DISCHARGE FLOW INFORMATION

Process wastewater 2,000 gpd avg.
Hauled In (treated wastewater) 66,800 gpd avg.
Sanitary: 500 gpd avg.

Boiler blow-down 700 gpd avg.
Average Total Plant Discharge: 70,000 gpd avg.

BATCH DISCHARGE INFORMATION

Frequency: 4-5 batches per day/average
Duration: 2 hours per batch average

Max. Volume: 12,000 gallons per batch

Permit No.: 913-94645-IU

5. **SOURCES OF INFORMATION**

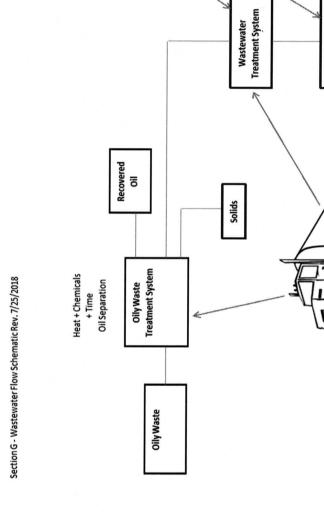
- (i) Company's Current Permit effective September 02, 2018
- Six Month Compliance Report received on December 23, 2019 (i)
- (ii) Water Treatment Overview dated July 7, 2016
- (iii) Comprehensive Inspection conducted on August 28, 2019
- Additional Permit Information received on July 25, 2018 (iv)
- PFAS BMP submitted on March 28, 2019 (v)
- PFAS Compliance Agreement dated April 26, 2019 (vi)
- (vii) PFAS Compliance Report dated September 30, 2019

Date: 03/04/2020

Reviewed by:__

Date: 03/04/2020

Permit No.: 913-94645-IU



Primary

Secondary

Effluent Tank

City Sewer

aevitas Antas securivas aminos com

Attachment 2

Permit No.: 913-94645-IU

