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AGENCY NAME & ADDRESS	Pollution Control Analyst BUREAU OF WATER AND WASTEWATER 900 Municipal Building		
SUBJECT	Policy Decisions - Pretreatment Program		

TO

DATE: 16 April 1986

Pollution Control Supervisory Staff
Back River Wastewater Treatment Plant
8201 Eastern Boulevard

In recent discussions that we have had at our staff meetings, it was realized that the establishment of policy guidelines, with regard to program implementation for the Pollution Control Section, should be developed. Therefore, the policies contained herein must be adhered to in order to assure continuity, equity and efficiency in the implementation of all industrial wastewater programs. These policies will be in effect until such time as you are notified otherwise.

SPLIT SAMPLING POLICIES

1. All companies which split samples with the City must do so in strict accordance with the split sampling agreement previously developed.
2. The split sampling agreement must be sent by certified mail to all affected companies prior to the agreement to conduct said split sampling.
3. The only companies with which the Pollution Control Section should now be splitting samples are those companies which are being monitored for the industrial surcharge program. All samples that are collected at these companies or any other company which are to be used for enforcement purposes under the Pretreatment Program are not to be split with the company unless approved by the Pollution Control Administrator, specifically.

PERMIT CATEGORIES

1. Discharger of priority and/or toxic pollutants.
2. Potential Discharger (by intent, negligence, and/or accident) that uses, produces, or stores priority and/or toxic pollutants.
3. Discharge of prohibited substances.
4. Potential Discharger (by intent, negligence, and/or accident) that uses, produces, or stores prohibited substances.
5. Non-discharger or discharger of domestic wastewater (only) that does not otherwise qualify under category 2, 4, 5s or 6.

- 5s. A non-discharger or discharger of domestic wastewater that does not otherwise qualify under category 2, 4 or 6 but should be reinspected yearly due to a significant potential for changes or growth in operations and/or processes.
6. Discharger or potential discharger that uses, produces or stores insignificant quantities of priority and/or toxic pollutants and/or prohibited substances.

FATS, OILS AND GREASE VIOLATIONS

1. All fats, oils and grease violations are to be addressed with a notice of violation as soon as possible.
2. All enforcement on fats, oils and grease violations will be based on grab samples and not from samples collected as composites.
3. The initiation of violation notices to fats, oils and grease violators should be initiated on those companies which have permits. Those companies without permits should, first, be permitted and only their subsequent fats, oils and grease violations will be handled as an enforcement action.
4. Enforcement action should be first initiated against those industries discharging petroleum or mineral based oils; followed by those industries discharging animal or vegetable fats, oils or greases that are creating clogging problems; and lastly enforce against those industries discharging animal or vegetable fats, oils and grease which are exceeding 100 mg/l. If the last category of violators contains industries which are unable to further reduce fats, oils or grease dischargers without significant impact to their company, then exemptions to this rule may be considered.

pH VIOLATIONS

1. pH violations are to be addressed with a notice of violation as soon as possible.
2. pH violations should only be considered on a waste stream after dilution in the immediate sewer. This should be accomplished with instantaneous readings at the next manhole downstream when possible or at some distance, after mixing, down the line from the monitoring point or manhole.
3. Starting immediately, three pH readings will be taken on all industrial wastewater samples. These readings will be an instantaneous reading of the raw waste stream from the industry,

a reading of the composited wastewater sample, the instantaneous pH reading following dilution alluded to above if necessary, and the instantaneous pH reading that is taken in the laboratory.

BASELINE MONITORING REPORTS

1. Baseline Monitoring Reports (BMR's) must be done for all categorical industries.
2. The initiation of collection of BMR's from the electroplating and/or metal finishing companies should commence immediately. The companies should be informed that they will not be allowed to use Pollution Control Section analytical results in these reports.

METAL FINISHERS

1. All metal finishing industries should be immediately informed of regulations governing their operations as we are the Control Authority and are required by federal law to do so.

COMPLIANCE REPORT

1. All Compliance Reports will be required for all categorical industries.
2. The same analytical data that was used for the BMR may be used for the Compliance Report, but should be submitted separately with respective information required of these reports identified separately.

ANALYTICAL RESULTS

1. All analytical results shall be mailed to the attention of the proper representative for each industry.
2. All analytical reports and results that are particularly important or need to be discussed in person shall be hand-delivered by the Pollution Control Area Coordinator upon completion

MONITORING

1. Starting immediately, no advanced notice will be given to any industry that the Pollution Control Section will be conducting sampling activities.

2. All monitoring staff must carry with them the appropriate credentials, which shall be presented to the industry upon entry.
3. Those industries which require entry after clearance through a guard house, and who detain monitoring personnel beyond reasonable time periods, will be required to install a monitoring site outside of the property line.

LIMITATIONS

1. The limitation sheets must accompany all future permits and be sent to those companies whose permits are either up for renewal or are being issued for the first time regardless of the category designation.

PERMITS

1. All permits shall be issued as soon as possible regardless of whether the company has been inspected or not, following a category determination by the Pollution Control Area Coordinator and review by the Permits Coordinator.

PHONE CONVERSATIONS

1. All phone conversations with industrial clients shall be documented using the appropriate forms.

ANALYTICAL RESULTS

1. All concentrations on analytical results reviewed from our laboratory shall be rounded off in order to determine compliance.
2. Industrial samples that are used for compliance purposes shall be accompanied by a chain-of-custody form.
3. Analytical results for four consecutive monitoring days (on a floating basis) will be used to assess compliance.

UNDER 10,000 GALLON PER DAY ELECTROPLATERS

1. These industries must meet federal categorical standards for cyanide, cadmium and lead until September 1, 1986 at which time they must meet the greater than 10,000 gallons per day categorical standards.

NON-COMPLIANCE

1. Those industries that continue in non-compliance for the same parameter must be addressed with the utilization of a Compliance

Pollution Control Supervisory Staff
16 April 1986
Page 5

Schedule. Fines will be levied on those industries which use repeat excuses in order to justify their non-compliances.

LETTER SIGNATURE

1. All routine enforcement letters will be sent out under the Pollution Control Administrator's name but will be signed by an Assistant Pollution Control Administrator or by the Enforcement and Investigation Coordinator in their absence.


PAUL H. "KIP" KEENAN, JR.

PHK/tm

cc: Mr. Nelson A. Luthy
Mr. Manubhai A. Patel