



Background Information and Additional Instructions for City of Greensboro SIU Wastewater Discharge Permit Application

Background Information

- Link to City of Greensboro Sewer Use and Pretreatment Ordinance
<https://www.greensboro-nc.gov/home/showpublisheddocument/44835/637160587212530000>
- The City of Greensboro (City) does not charge a Significant Industrial User (SIU) Permit Application fee or an SIU Permit fee.
- The City Industrial Waste Section (IWS) has up to 90 days after receipt of a *complete* SIU Wastewater Discharge Permit Application to review the application and determine if an SIU Permit is required and/or appropriate.
- Prior to the issuance of an SIU Wastewater Discharge Permit, the NC Department of Environmental Quality (NCDEQ) requires the City to conduct an on-site inspection. All equipment, production processes, and pretreatment systems must be fully installed at the time of the facility inspection. The Inspection Report is part of a *complete* Wastewater Discharge Permit Application.
- A copy of the Inspection Report, SIU Permit Application, and draft SIU Permit must be submitted by the City to NC Department of Environmental Quality (NCDEQ) for review at least thirty days prior to the effective date of the permit. The permittee is also allowed the same thirty-day comment period on the draft SIU Permit. If no written comments or objections are received by the City within the thirty-day comment period, the permit is considered final and binding.
- TO NEW FACILITIES: North Carolina Law requires that plans for all wastewater pretreatment systems must be submitted to the City for the issuance of an “Authorization to Construct” (A to C). An Authorization to Construct approval letter must be obtained from the City prior to the initiation of construction. Sampling and monitoring equipment is considered part of the pretreatment system.
- All Greensboro SIU Permits are issued for a maximum of five years and expire on the same day. Thus, an SIU Permit for a new facility may be issued for a period shorter than five years.

Confidentiality and Confidential Business Information (CBI)

- Information revealed in the SIU Permit Application may be held confidential or proprietary under 40 CFR 403.14 at the request of the Industrial User and acceptance by the City IWS.
- *The request for confidentiality must be made at the time of the initial submission of the application by stamping/marketing the words “confidential” or “confidential business information” on each page containing such information.*
- Reminder: Effluent data is public information and may not be considered confidential per the United States Environmental Protection Agency (USEPA).

Permit Application General Instructions:

- If you have questions about the application form, or are having issues using the digital form, please contact the IWS and we will be happy to assist you. Upon request, we can provide the application as a Word document if you do not wish to use the Adobe pdf format.
- Please answer all questions. DO NOT LEAVE BLANKS. If a question is not applicable, indicate so on the form (enter N/A or “not applicable”).
- Please attach additional pages or information if insufficient space is provided for your answer.
- The City IWS recognizes that some questions may appear to have multiple answers.
- The SIU Permit Application may not be submitted electronically as a wet signature is required.

New or Proposed Facility Information

- Provide the *projected date* of the first discharge of wastewater generated by the manufacturing, production, or service operation conducted at the facility described in the permit application.
- Be aware that some of the information required in this application may not yet be available from a new or proposed facility that has never discharged wastewater to the City sanitary sewer system.
 - If that is the case, there are several appropriate options: 1) answer “not yet available” with a date indicating when the information may become available, 2) provide estimates based on best professional judgment (BPJ), 3) provide estimates based on operations at a similar facility or (4) provide actual data from a similar facility (similar raw materials, products, wastewater characteristics). For options 2-4, be sure to note the origin of the information, such as “tentative”, “BPJ” or “based upon similar operations located in [city, state]”.
- The City IWS may provide a “Letter of Intent to Issue SIU Permit” to a new or proposed facility early in the siting process when sufficient permit application information has been submitted to make a permit determination (complete flow and wastewater characterization data, manufacturing process information to determine applicability of any Federal Categorical Standard, pretreatment system proposal, etc.) but the construction process is not far enough along to conduct the required on-site inspection. The Letter of Intent would generally include speculative SIU Permit Limits and speculative Local Pollutant Allocations.

INSTRUCTIONS FOR SPECIFIC PERMIT APPLICATION SECTIONS

Section A. General Information

- A1. List two persons (a primary and a back-up) who work on-site at the facility and are authorized to represent the facility regarding SIU Permit matters. One of these persons may also be designated as the Signatory Official listed in Section K (page 28).
- A2. Check all that apply in this section.
 - *Example:* If this is a new facility or a proposed facility and is subject to a Federal Categorical Pretreatment Standard, this application will also qualify as the EPA required Baseline Monitoring Report, so *New Permit for Proposed Discharge* and *Baseline Monitoring Report* should both be checked
 - *Existing Industries:* You may request an increase in a Permit Limit or an increase in a Local Pollutant Allocation due to process changes, production increases, or other seemingly justifiable reasons. The request can be made at the time of permit renewal or at any time during the permit cycle. Approval will be granted or denied by the City IWS on a case-by-case basis, depending on the available Maximum Allowable Headworks Loading, the parameter in question, and applicable regulations.

Section B. Business Activity

- B5. and B6. NAICS and SIC Codes (page 4)
List the North American Industry Classification System (NAICS) and the Standard Industrial Classification (SIC) codes for your facility. These codes may be found on tax documents, some Human Resources documents, or you may contact the Greensboro IWS (we have copies of the manuals).
- B7. Industrial Categories with Federal Discharge Standards (page 5)
Check any activities that are performed at this facility. This does not mean that the products are merely used; they must be *manufactured* at this site. For example, just because soap and detergents are used in a facility does not mean that the Soap and Detergent Manufacturing (40 CFR 417) category should be checked. Please contact the IWS if you need assistance completing this section.

Section C. Facility Staffing and Operational Information (page 6-8)

- Application includes detailed instructions. Contact Greensboro IWS if you have questions.

Section D – Water Sources and Wastewater Discharges

- D1. Water Sources, Use, and Wastewater Disposal (Water/Wastewater Balance Sheet)
 - **New/Proposed facility:** Please estimate data and briefly explain how the water use and wastewater discharge values were determined.
 - *Contact cooling water* is cooling water that comes into contact with process materials, thereby becoming contaminated. *Noncontact cooling water* does not come into contact with process materials. *Domestic wastewater* is water used only in restrooms or breakroom/lunchroom facilities. If domestic flow is not metered, provide an estimate
 - *Dilution wastestreams* generally include but are not limited to domestic, boiler blowdown, cooling tower bleed-off, non-contact cooling or warming water and storm water runoff. Wastewater discharge classified as a dilution stream is virtually free of pollutants and contaminants found in wastewater generated by the production process and/or cleaning.

Section E. Wastewater Effluent Characteristics (page 11-16)

- E1. Priority Pollutant Checklist (page 12-14)

The USEPA published the list of “Priority Pollutants” they consider to be generally incompatible with conventional wastewater treatment processes when discharged in certain quantities.

 - A review of Safety Data Sheets [SDS] for chemicals and raw materials purchased, stored on-site or used at your facility will assist you in the completion of this section.
 - Section 3 of the SDS “Composition/Information on Ingredients” lists the chemical ingredients, usually by percent (%). The Chemical Abstract Number [CAS#] will often be listed in addition to the name of the chemical. The same chemical may have more than one “brand name”, but the CAS# is unique to a specific chemical formula regardless of the name.
 - Keep in mind that ingredients that are not acutely toxic are only required to be listed on an SDS if the final product contains greater than 1% (1% = 10,000 ppm) of the ingredient.

This section **MUST** be *completed with 2 check marks for each chemical* as described below:

- If the chemical is purchased, stored on-site, used or generated at the facility *and is present* in the wastewater discharged to the POTW, check “Present at Facility” and “Present in Discharge to POTW”.
- If the chemical is purchased, stored on-site, used or generated at the facility *BUT is not present* in the wastewater discharged to POTW, check “Present at Facility” and “Absent in Discharge to POTW”.
- If the chemical is not present at the facility [i.e. not purchased, not stored on-site, not used *and not generated* in any of the processes], check “Absent at Facility” and “Absent in Discharge to POTW”.
- RE: Laboratory Quantities of Chemicals: If the chemical is purchased, stored on-site or used at the facility but is present only in laboratory quantities, please indicate by the use of an asterisk (*) in the “Concentration in Discharge If Known” column.

Note: The City of Greensboro added 1,4-Dioxane, PFOS and PFOA as site-specific Priority Pollutants.

- *The City has a Special Order by Consent with NCDEQ to address 1,4-dioxane discharges to the sanitary sewer system. New or proposed SIUs must provide detailed information on the presence or absence of 1,4-dioxane in their wastewater discharge prior to and as a condition of SIU permit issuance. Further details will be provided by the IWS during the permitting process.*

Section F. Wastewater Pretreatment Facilities (page 17-18)

- F1. Pretreatment facilities not covered by 1-21 should be listed/described on separate attachment.

Section G. Non-Discharged Wastewaters/Waste (page 19)

- G1. If the facility is a Hazardous Waste Generator, list the type and quantity of hazardous waste generated.
- List the facility's EPA Hazardous Waste RCRA Generator ID#, if applicable, in Section I on page 23.

Section H. Chemical Storage and Spill Prevention (page 20)

- You may designate the pages in Section H. as "Confidential" for security purposes.

Section I. Other Environmental Permits (page 23)

- Examples: NPDES Permit, Air Permit, Storm Water Permit, RCRA Permit/ID#, etc.

Section J. Other Required Information (page 23-27)

- J1.-J3. Schematic Diagram, Pretreatment System Flow Diagram, and Plant Site Layout examples are provided in the application.
- J5. Effluent Sampling Data for *New Facilities/New Permittee*: **Contact IWS for site-specific required analyses, number of samples, and sampling instructions.**

Section K. Certification Statements (Page 28)

- The permit application must be certified/signed by an authorized representative of the company identified in Section A1. The definition of authorized representative may be found in the City of Greensboro Sewer Use and Pretreatment Ordinance.
- *PLEASE review the definition carefully before selecting your authorized representative.*
- Please note that a *Change in Signatory Authority Document* must be submitted to the City prior to or together with any reports to be signed by a new/different authorized representative.

Section L. Waste Reduction Information for State of North Carolina (page 29-30)

- State of NC Pretreatment Rule 15A NCAC 2H.0916(c)(1)(M) requires Significant Industrial Users to include in the permit application a description of waste reduction (pollution prevention) activities being utilized. The codes listed in the chart are standard EPA codes found on Toxic Release Inventory [TRI] and other environmental forms. Please check "current", "projected" or "N/A" for all codes relating to this facility's wastewater discharge. The City of Greensboro Industrial Waste Section will forward the information to the NCDEQ.

City of Greensboro Water Resources IWS Contacts:

Martie Groome 336-433-7229 martie.groome@greensboro-nc.gov

Amy Varinoski 336-433-7227 amy.varinoski@greensboro-nc.gov

Mail SIU Wastewater Discharge Permit Application to:

City of Greensboro Industrial Waste Section – T. Z. Osborne Plant

P. O. Box 3136

Greensboro NC 27402-3136

OR Hand Deliver to: T. Z. Osborne Plant, 2350 Huffine Mill Road, McLeansville NC 27301