

Economic Development Frequently Asked Questions

1. *Which industrial facilities must have a Significant Industrial User (SIU) Wastewater Discharge Permit from the City of Greensboro (City”)?*
 - Any facility subject to a Federal Categorical Pretreatment Standard [40 CFR Parts 405–471]
 - Any facility that discharges more than 25,000 gallons per day of process wastewater to the Greensboro sanitary sewer system
2. *Does Greensboro have wastewater capacity for my facility to grow?*
 - The Greensboro T. Z. Osborne WWTP (NPDES Permit #NC0047384) has a permitted capacity of 56 MGD.
 - Average flow January-June 2022 = 33.3 MGD
3. *How long will it take to get an SIU Permit?*
 - At least 90 days from the time Greensboro has a complete SIU Wastewater Discharge Permit application package.
 - NCDEQ requires an on-site inspection as part of the application process and all process equipment and pretreatment system equipment would need to be installed prior to the inspection.
 - NCDEQ gets a 30-day comment period on the draft SIU permit as does the Industrial User.
4. *What is the SIU permit duration?*
 - 5 years, but the first permit may be for a shorter period of time in order to gather more effluent discharge information or to be in sync with the expiration date of all other Greensboro SIU permits.
5. *Does Greensboro have an SIU permit fee or SIU application fee?*
 - Not at this time.
6. *Does Greensboro have sampling and monitoring fees?*
 - Not at this time.
7. *Will we have to conduct self-monitoring and install a sampling site and composite sampler?*
 - Yes
8. *What parameters does Greensboro surcharge and what are the rates?*
 - BOD at \$82.00/1000 pounds over 200 mg/l
 - TSS at \$76.00/1000 pounds over 200 mg/l

9. *Will I have to install wastewater pretreatment devices?*

- If the TZ Osborne WWTP has sufficient capacity for the pollutants you need, you may not have to install additional pretreatment.
- Greensboro has the least capacity for cadmium, lead, silver, and cyanide. The TZ Osborne WWTP is located on a small receiving stream and Greensboro's NPDES discharge limits and the State of North Carolina Water Quality Standards are very stringent for those pollutants.

10. *What would my wastewater discharge permit limits be?*

- Greensboro does not have a list of uniform concentration local limits like most cities. The POTW Protection Criteria Values listed on page 15 of the Sewer Use Ordinance are typical domestic wastewater concentrations. No user shall discharge wastewater in excess of those values without prior notice to the City.
- An SIU Permit or other discharge document is considered prior notice and allows the permittee to discharge as specified in the permit/document including concentrations and/or loading that may be above the domestic wastewater values.
- The City is required to calculate T. Z. Osborne WWTP Maximum Allowable Headworks Loadings (MAHL) for various Pollutants of Concern and must ensure that the MAHLs are not exceeded.
- Industrial Waste Survey/SIU Wastewater Discharge Permit Application information is used to develop Industrial User specific permit limits and/or local pollutant allocations that are issued in SIU/IU Wastewater Discharge Permits and Local Pollutant Allocation Documents. Thus, some discharge limits can be negotiated through Greensboro's pollutant trading program based on need and MAHL available capacity at the T.Z. Osborne WWTP.
- Greensboro strives to issue discharge limits no more stringent than the Federal Categorical Pretreatment Standards if the Industrial User is subject to such standards. Any parameters not addressed or included in the Federal Categorical Standards will be determined by the City of Greensboro on a case-by-case permit specific basis.
- The City has designated 1,4-dioxane as a local Pollutant of Concern. All new SIUs/IUs must certify that 1,4-dioxane is "Present" or "Absent" in any proposed wastewater discharge *prior to permit issuance*. If present, a source reduction plan to reduce, eliminate, or treat 1,4-dioxane will be required.
- See example below of Uniform Concentration SIU Permit limits vs. the City of Greensboro Pollutant Trading SIU Permit limits.

Uniform Concentration Limits

Uniform Concentration Limits

Apply Same Concentration Limit to all SIUs
(no consideration of actual SIU discharge/need)

= 2.5 pounds Nickel / (0.3 MGD * 8.34) = 1.0 mg/l

TOTAL FLOW = 300,000 gpd

0.10 MGD
0.10 MGD
0.10 MGD

Example: SIU Permit Limits using Uniform Concentration




2.5 lbs Nickel to Distribute			
Industry	Food Processing	Metal Finishing	Textile
Actual SIU Discharge	0.05 mg/l	1.5 mg/l	0.11 mg/l
Uniform Limit	1.0 mg/l	(\$\$\$ to meet limit) 1.0 mg/l	1.0 mg/l
2.5 Pounds Ni Permitted	0.834 lbs	0.834 lbs	0.834 lbs

City of Greensboro Pollutant Trading Program

SIU Permit Limits using Greensboro Trading Method

- Essentially a *pollutant trading* system
 - Based on need: SIUs get more of the pollutants they actual need and share the ones they do not need
- Greensboro controls/tracks all trades
- SIU Permit Limit Determination
 - Review industry data to determine limit that can be met *on a consistent basis*
 - Add a safety factor

Example: SIU Permit Limits using Greensboro Trading

2.5 lbs Nickel to Distribute			
Industry	Food Processing	Metal Finishing	Textile
Actual SIU Discharge	0.05 mg/l	1.5 mg/l	0.11 mg/l
Greensboro Limit	0.1 mg/l	2.38 mg/l (Categorical Std)	0.2 mg/l
2.23 Pounds Ni Permitted	0.08 lbs	1.98 lbs	0.17 lbs