

June 16, 2020

Mr. Roby Mersecchi
Southwest Pickling Inc.
68 Waldron Drive
Durant, OK 74701

RE: Wastewater Discharge Permit

Dear Mr. Mersecchi,

Please find enclosed the industrial user wastewater discharge permit that the City of Durant has developed for Southwest Pickling, Inc. No significant changes were made, other than the date when the permit actually goes into effect, and some additional testing requests, which are in Ordinance 1590. This permit will be in effect August 1, 2020 through June 30, 2025. Be aware, that **since the application to reapply was submitted late (6/10/2020), discharge cannot happen until the 30 day notice from publication in the newspaper expires**. Failure to heed this action will result in a penalty for “discharging without a permit”, and the fines are quite clearly spelled out in Ordinance 1590.

You will be notified by mail and email when the publication of notice will be done, and the permit will go into effect August 1, 2020.

If you have any questions or would like to discuss any aspect of this permit, please contact the Pretreatment Department at (580) 924-3416.

Sincerely,

George McAusland
Pretreatment Coordinator
City of Durant

Cc: James Dalton, Assistant City Manager

INDUSTRIAL WASTEWATER DISCHARGE PERMIT

Permit No. Durant – 04-06-03-03

Facility name: **Southwest Pickling Inc.**
Location address: **68 Waldron Drive**
Mailing address: **PO Box 1186, Durant, OK 74701**
Telephone: **(580) 924-6996**

Southwest Pickling Inc. is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Durant sewer system in accordance with conditions set forth within this permit. Compliance with this permit does not relieve the permittee of its obligations to comply with any or all applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit constitutes a violation of the City of Durant Industrial Pretreatment Waste Ordinance Number 1590.

This permit shall become effective on **August 1, 2020**, and shall expire at midnight **June 30, 2025**.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit a minimum of **180 days** prior to the expiration date.

By: _____

George McAusland, Pretreatment Coordinator

By: _____

James Dalton, Assistant City Manager

Issued this **1st** day of **August**, 2020.

PART I – EFFLUENT LIMITATIONS

- A. Permit requirements are based on the General Pretreatment Regulations for Existing and New sources of Pollution (40 CFR Part 403), Metal Finishing Point Source Category (40 CFR Part 420), and the City of Durant Industrial Pretreatment Waste Ordinance Number 1590.
- B. During the period of August 1, 2020 through June 30, 2025, the permittee is authorized to discharge process and sanitary wastewater to the City of Durant sewer system from the outfalls listed below.

<u>Outfall</u>	<u>Description</u>
04	Outfall 04 is on the 3 inch line located between the steel treatment and the office building. There is a sampling port at this location.

- C. During the period of August 1, 2020, through June 30, 2025, the discharge from Outfall 04 shall, at all times, be in compliance with all of the City of Durant local discharge limitations and limitations set forth in this permit for pH, temperature, Lead, and Zinc.

DISCHARGE LIMITATIONS FOR OUTFALL 04

PARAMETERS	MASS LOADINGS (lb/day unless otherwise specified)		CONCENTRATION/OTHER UNITS (mg/l unless otherwise specified)	
	DAILY MAXIMUM	DAILY AVERAGE	DAILY MAXIMUM	DAILY AVERAGE
Flow (MGD)	Report MGD	Report MGD	n/a	n/a
Lead	0.0071	0.0024	0.108	0.07
Zinc	0.0094	0.0031	0.26	0.08
Temperature	n/a	n/a	110 degrees F	110 degrees F
pH	n/a	n/a	Between 6.0 s.u. and 10.0 s.u.	
BOD5	n/a	n/a	225 mg/l	225 mg/l
TSS	n/a	n/a	200 mg/l	200 mg/l
FOG	n/a	n/a	200 mg/l	200 mg/l
TDS	n/a	n/a	Report	Report

NOTE: See fact sheet for explanation of limits.

PART 2 – MONITORING REQUIREMENTS

- A. Southwest Pickling plant currently has a flow meter that has been relocated inside the building. The meter shall be calibrated once per year by a certified technician. Certification statement that the meter has been calibrated shall be sent to the City of Durant Pretreatment Department by the 15th of the month following calibration.
- B. From August 1, 2020, through June 30, 2025, the permittee shall monitor outfall 04 for the following parameters, at the indicated frequency:

MONITORING REQUIREMENTS

Parameter	Monitoring Frequency	Type
Flow	Continuous	Record/Report each month
Lead	1/Discharge (1)	Composite (2) Batch
Zinc	1/Discharge (1)	Composite (2) Batch
pH	1/Discharge (1)	Grab
BOD5	1/Discharge (1)	Composite (2) Batch
TSS	1/Discharge (1)	Composite (2) Batch
FOG	1/Discharge (1)	Composite (2) Batch
Total Toxic Organics	Every 6 months	Composite (2) Batch
TDS	1/Discharge (1)	Composite (2) Batch

- (1) Southwest Pickling discharges “batch” discharges. The company does not discharge continuously. The composite shall consist of each sample taken during each discharge as a grab. Once a month’s worth of samples have been collected, the samples shall be composited together and sent off for analysis. If the industry does not discharge more than once per month, then the industry shall take grab samples every hour during the discharge that it discharged and composite the grab samples together. All samples shall be preserved according to EPA standards.
- (2) Total Toxic Organics shall be sampled and tested every 6 months. Alternatively, Southwest Pickling can prepare a Toxic Organic Management Plan (TOMP) in place of monitoring for Total Toxic Organics every 6 months. The TOMP must be approved by the Control Authority before implementation can go into effect.
- (3) For TDS, simply report the values according the stated sampling frequency. This is to monitor for a parameter directly affected by the POTW. This may be modified if a limit for the POTW is imposed on the OPDES permit.

PART 3 – REPORTING REQUIREMENTS

A. Monitoring Reports

Monitoring results shall be reported each month that the industry discharges. The reports are due by the fifteenth (15th) day of the following month in which samples were collected. The first report is due by September 15, 2020. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed during the calendar month preceding the submission of each report including measured maximum and average daily flow.

Reports are required every month without regard to actual discharge activities. The City of Durant IDP Self-Monitoring report shall be used to report all data.

Reports will be deemed to have been submitted on the date postmarked. For reports which have not been mailed, postage prepaid, into a mail facility serviced by the U.S. Postal Service, the date of the receipt of the report shall govern.

B. Reporting address

All reports required by this permit shall be submitted to the following address or email:

Attn: George McAusland
City of Durant
Pretreatment Coordinator
1222 Davis Rd
Durant, OK 74701

Email: pretreatment@durant.org

- C. If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by the EPA or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and results shall be reported in the monthly report submitted to the City of Durant. Such increased monitoring frequency shall also be indicated in the monthly report.

D. Automatic Resampling

If the results of the permittee's wastewater analysis indicate that a violation of this permit has occurred, the permittee must:

1. Inform the City of Durant of the violation within 24 hours of becoming aware of the violation; and
2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days of becoming aware of the first violation.

E. Reports of Potential Problems

1. In the case of any discharge including, but not limited to, accidental discharges of a non-routine, episodic nature, a non-customary batch discharge, or a slug discharge which may cause potential problems for the POTW (including a violation of the prohibited discharge standards), the permittee shall immediately notify the City of Durant of the incident. During normal business hours the City of Durant should be notified by telephone at (580) 924-3416. The City of Durant Police Department should be notified by telephone at (580) 924-3737 or by pager at (580) 920-3019

after 3:30 pm, Monday through Friday, or weekends and holidays. The notification shall include the location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental release in accordance with this section does not relieve the permittee of other reporting requirements that arise under local, State, or Federal laws. Within five days following an accidental discharge, the permittee shall submit to the City of Durant a detailed written report. This report shall specify:

- a. Description and cause of the upset, slug load, or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, correction, and volume of waste.
- b. Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.

F. Signature requirements

All reports submitted by the Industrial User shall be signed by an official of the industry, which has the authority to do so and include a certification statement as follows:

"I certify under penalty of law that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

PART 4 STANDARD CONDITIONS

Section A GENERAL CONDITIONS

1. Severability

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including civil litigation, criminal penalties, injunctive relief, and summary abatement.

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize any adverse impact to the POTW resulting from noncompliance with any effluent limitation specified within this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Modification

This permit may be modified for good cause including, but not limited to, the following:

- a. To include any new or revised Federal, State, or local pretreatment standards or requirements;
- b. To address significant alterations or additions to the permittee's operation, processes, or wastewater volume or character since the time of wastewater discharge permit issuance;
- c. A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- d. Information indicating that the permitted discharge poses a threat to the City of Durant collection and treatment system, POTW personnel, or the receiving waters;
- e. Violation of any terms or conditions of the permit;
- f. Misrepresentation or failure to fully disclose all relevant facts in the permit application or in any required reporting;
- g. Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13;
- h. To correct typographical errors in the permit; or
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator

5. Permit Revocation

This permit may be revoked for the following reasons:

- a. Failure of the permittee to notify of significant changes to the wastewater prior to the changed discharge;
- b. Failure of the permittee to provide prior notification of changed conditions;
- c. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge application;
- d. Falsifying self-monitoring reports;
- e. Tampering with monitoring equipment;
- f. Refusing to allow timely access to facility premises and records;
- g. Failure to meet effluent limitations;
- h. Failure to pay fines;
- i. Failure to pay sewer charges;
- j. Failure to meet compliance schedules;
- k. Failure to complete a wastewater survey or the wastewater discharge permit application;
- l. Failure to provide advanced notice of the transfer of a permitted facility;
- m. Violation of any pretreatment standard or requirement, or any terms of the permit, or the City of Durant Pretreatment Waste Ordinance 1590.

6. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or Local laws or regulations.

7. Permit Transfer

This permit may be reassigned or transferred to a new owner and/or operator only if the permittee gives at least ninety (90) days advance notice to the City of Durant Pretreatment Coordinator, and the Pretreatment Coordinator approves the permit transfer. The notice to the Pretreatment Coordinator must include a written certification by the new owner and/or operator which:

- a. States that the new owner/operator has no immediate intent to change the facility's operations and processes;
- b. Identifies the specific date on which the transfer is to occur; and
- c. Acknowledges full responsibility for complying with this permit.

8. Dilution

The permittee shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

9. Definitions

- a. Daily Maximum – the maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- b. Composite Sample – A sample collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a time composite sample: composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or as a flow proportional composite sample: collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each sample aliquot as the flow increases while maintaining a constant time interval between the aliquots.
- c. Grab sample – A sample that is taken from a wastestream on a one-time basis without regard to the flow in the wastestream and without consideration of time.
- d. Instantaneous Maximum Concentration – The maximum concentration of a pollutant allowed to be discharged at any time, determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and duration of the sampling event.
- e. Monthly Average – The arithmetic mean of values for effluent samples collected during a calendar month or specified 30-day period (as opposed to a 30-day window).
- f. Upset – Means an exceptional incident in which the is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond reasonable control of the permittee, **excluding such factors as** operational error, improperly

designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.

- g. Bypass – Means intentional diversion of wastes from any portion of a treatment facility.

10. **General Prohibitive Standard**

The permittee shall comply with all the general prohibitive discharge standards in the City of Durant Industrial Pretreatment Waste Ordinance. Namely, the industrial user shall not discharge the following substances to the POTW:

- a. Pollutants which create a fire or explosive hazard in the municipal wastewater collection and POTW, including, but not limited to wastestreams with a closed-cup flash point of less than 140 degree F (60 degrees C) using test methods specified in 40 CFR 261.21;
- b. Any wastewater having a pH less than 6.0 or more than 10.0, or otherwise causing corrosive structural damage to the POTW or equipment, or endangering City personnel;
- c. Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in interference, but in no case solids greater than one quarter of an inch (0.25) or (0.635 cm) in any dimension;
- d. Any wastewater containing pollutants, including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with either the POTW; or any wastewater treatment or sludge process, or which will constitute a hazard to humans or animals;
- e. Any wastewater having a temperature greater than 110 degrees F (43.3 degrees C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction of the treatment plant to exceed 104 degrees F (40 degrees C);
- f. Petroleum oil, non biodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;
- g. Any pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- h. Any trucked or hauled pollutants except at discharge points designated by the Pretreatment Coordinator in accordance with the City of Durant Industrial Pretreatment Waste Ordinance (Ordinance 1590);
- i. Any noxious or malodorous liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance, a hazard to life, or to prevent entry into the sewers for maintenance and repair;
- j. Any wastewater, which imparts color, which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent thereby violating the City of Durant OPDES permit;
- k. Any wastewater containing radioactive wastes or isotopes except as specifically approved by the pretreatment coordinator in compliance with applicable State or Federal regulations;
- l. Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, unless specifically authorized by the pretreatment coordinator;

- m. Any sludges, screenings, or other residues from the pretreatment of industrial wastes;
- n. Any medical wastes, except as specifically authorized by the pretreatment coordinator in a wastewater discharge permit;
- o. Any wastewater causing the treatment plant's effluent to fail a toxicity test; and/or
- p. Any wastes containing detergents, surface-active agents, or other substances which cause excessive foaming in the POTW.

11. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this permit does not relieve the permittee from its obligations regarding compliance with any and all local, State, and Federal pretreatment standards and requirements including any such standards and requirements that may become effective during the term of this permit.

SECTION B – OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with this permit, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment Facilities

- a. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, or severe property damage and no feasible alternative exists;
- b. The permittee may allow a bypass to occur which does not exceed effluent limitations, but only if it is also for essential maintenance to assure effluent operation and the permittee shall notify the City of Durant Pretreatment Department of such bypasses;
- c. Notification of bypass:
 - i. Anticipated bypass: If the permittee knows in advance of the need for bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the City of Durant Pretreatment Department.
 - ii. Unanticipated bypass: The permittee shall notify the City of Durant and submit written notice to the pretreatment coordinator within five (5) days. The report shall specify:
 - A. A description of the bypass, and its cause, including its duration;
 - B. Whether the bypass has been corrected;

- C. The steps being taken to reduce, eliminate, and prevent a reoccurrence of the bypass.

4. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with Section 405 of the Clean Water Act and Subtitle C and D of the Resource Conservation and Recovery Act, or any other State or local regulations.

SECTION C – MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required by this permit shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit, unless otherwise specified, before the effluent joins or is diluted by any other wastestreams, body of water, or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected, and maintained to ensure their accuracy. Monitoring points shall not be changed without notification and the approval of the City of Durant.

2. Flow Measurement

If flow measurement is required by this permit, The appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated (on a yearly basis), and maintained to ensure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

3. Analytical Methods to Demonstrate Continued Compliance

All sampling and analysis required by this permit shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA, or as specified in this permit. All samples analyzed shall be done by a laboratory approved by the City of Durant.

4. Inspection and Entry

The permittee shall allow the City of Durant Pretreatment Department or authorized representative, or an authorized representative of the Environmental Protection Agency (EPA) or the State of Oklahoma, upon the presentation of credentials and other documents as may be required by law, to:

- a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor, for the purpose of assuring permit compliance, any substances or parameters at any location; and
- e. Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under this permit, could originate, be stored, or be discharged to the sewer system.

5. Retention of Records

- a. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report, or application.

This period may be extended by request of the City of Durant at any time.

- b. All records that pertain to matters that are subject to special orders or any enforcement or litigation activities brought by the City of Durant shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitations with respect to any and all appeals have expired.

6. Record Contents

Records of sampling and analyses shall include:

- a. The date, exact place, time, and method of sampling or measurements, and sample preservation techniques and procedures;
- b. Who performed the sampling and measurements;
- c. The dates the analyses were performed;
- d. Who performed the analyses;
- e. The analytical techniques or methods used; and
- f. The results of such analyses.

7. Falsifying Information

Knowingly making any false statements on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions.

SECTION D – ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

The permittee is required to notify the City of Durant of any planned significant changes to the permittee's operations or system, which might alter the nature, quality, or volume of its wastewater at least 30 days before the change.

2. Anticipated Noncompliance

The permittee shall give advanced notice to the City of Durant of any planned changes in the permitted facility of activity, which may result in noncompliance with permit requirements.

3. Duty to Provide Information

The permittee shall furnish to the City of Durant, within ten (10) working days any information which the City of Durant may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also, upon request, furnish to the City of Durant within five (5) days copies of any records required to be kept by this permit.

4. Signatory Requirements

All applications, self-monitoring reports, or information submitted to the City of Durant must contain the following certification statement and be signed by an authorized representative of the permittee:

“I certify under penalty of law that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

5. Operating Upsets

Any permittee that experiences an upset in operation that places the permittee in a temporary state of noncompliance with the provisions of this permit **or** with the City of Durant Industrial Pretreatment Waste Ordinance (Ordinance 1590) shall inform the City of Durant Pretreatment Department immediately of becoming aware of the upset at (580) 924-3416 between 7:00 AM and 3:30 PM Monday through Friday. The City shall be notified at (580)924-3737 or pager (580) 920-3019 after 3:30 pm Monday through Friday or weekends and holidays.

A written follow-up report of the upset shall be filed by the permittee with the City of Durant Pretreatment Department within five days. The report shall specify:

- a. Description of upset, the cause(s) thereof and the upset's impact on the permittee's compliance status;
- b. Duration of noncompliance, including exact dates and times of noncompliance, and if not corrected, the anticipated time the noncompliance is expected to continue; and\
- c. All steps taken or to be taken to reduce, eliminate, and prevent reoccurrence of such an upset.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner.

A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations attributable to the upset.

6. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under the City of Durant Industrial Pretreatment Waste Ordinance (Ordinance 1590) or State or Federal laws or regulations.

7. Penalties for Violations of Permit conditions

Any violation of this permit or the City of Durant Industrial Pretreatment Waste Ordinance (Ordinance 1590) is punishable by a fine of not more than one thousand (\$1000) dollars per violation per day. Each violation will be evaluated by the Enforcement Response Plan set forth in the City of Durant Pretreatment Program. These penalties shall be in addition to any other cause of action for personal injury or property damage available under State law.

PART 5 – REOPEN CLAUSE

1. This permit may be reopened and modified to incorporate any new or revised requirements contained in a National Categorical Pretreatment Standard.
2. This permit may be reopened and modified to incorporate any new or revised requirement developed by the Pretreatment Department re-evaluation of any local limits established for this permit.
3. This permit may be reopened and modified to incorporate any new or revised requirement developed by the Pretreatment Department as necessary to ensure POTW compliance with applicable sludge management requirements promulgated by the EPA (40 CFR 503).

Applicant Activity

Southwest Pickling, Inc is located at 68 Waldron Dr. Durant, ok. The company treats pieces of steel to remove oxides and scale. The steel is treated in four processes and they are as follows:

1. The steel is immersed into a tank filled with sulfuric acid.
2. The steel is pulled from the sulfuric acid tank and allowed to suspend in the air for about 15 minutes. The steel is then put into a water tank for rinsing.
3. The steel is immersed in a tank filled with caustic soda to neutralize it.
4. The steel is immersed into a tank filled with oil to prevent rust.

After the steel is treated, it is shipped back to the company that sent it to Southwest Pickling, Inc.

Industrial Pretreatment Activity

Water is from two different sources from this company. One is from the office building where domestic waste only is discharged. The other is from the water tank. Once sulfuric acid is no longer usable, it is pumped into a holding tank, 200 gallons at a time, and then to a pretreatment tank. Bags of lime are added to the pretreatment tank to neutralize the solution. It is then discharged to the City of Durant POTW. SWP does not release spent acid into the waste system. Penco, Inc. picks up spent acid and transports it to a recycling facility.

Fact Sheet

1. Information Sources

- DEQ Categorical Industrial user Permit No. OKP003008
- Clean Water Act (Sections 301 and 402(a))
- 40 CFR parts 136, 403, and 432
- City of Durant Ordinance Number 1590 (City of Durant Industrail Pretreatment Waste Ordinance)

- Wastewater Survey received from Southwest Pickling, Inc. on July 6, 2009
- History of wastewater sampling gathered by Southwest Pickling, Inc.
- Letter received from Southwest Pickling on March 15, 2003. This letter had the company's history of amount of steel treated, amount of wastewater discharged, and amount of days worked in 2001 and 2002.

2. Effluent Limitations Rationale

Permit requirements are based on the General Pretreatment Regulations for Existing and New Sources of Pollution (40 CFR Part 403), Metal Finishing Point Source Category (40 CFR Part 420), and the City of Durant Industrial Pretreatment Waste Ordinance (Ordinance 1590). The discharge from this industry consists of process wastewater from a sulfuric acid pickling plant. The categorical limits are production based and the 1590 Ordinance limits are expressed in concentration based limits. The following shows the calculations and comparison of limits.

Later dates for production have slowed to such a point that we will continue to use these levels to propose limitations, allowing room for production growth in the future.

Gallons of processed wastewater discharged:

2001 - 450000

2002 - 136800

Total - 586800

Amount of pounds of steel treated:

2001 - 5220000

2002 - 373840

Total – 5593840

Number of days of production:

2001 - 120 days

2002 - 14 days

Total - 134 days

Average gallons of processed wastewater discharged for 2001-2002 each working day:

586,800 gallons of processed wastewater/134 days of production = **4379 gpd**

Average pounds of steel treated per day 2001-2002:

5593840/134 = **41745 lb/day = 41745/1000 = 41.745**

Maximum lb/day per 1000 lbs of product		30 day avg in lb/day per 1000 lbs of product	
Lead	0.000169	Lead	0.0000563
Zinc	0.000225	Zinc	0.0000751

Maximum limit in lbs for lead and zinc calculation

Lead – max/day in lbs = 41.745 x 0.000169 = 0.0071

Lead – monthly average in lbs = 41.745 x 0.0000563 = 0.0024

Zinc – max/day in lbs = 41.745 x 0.000225 = 0.0094

Zinc – monthly average in lbs = 41.745 x 0.0000751 = 0.0031

Pretreatment Standards (PSES) 420.95 (a)(2) converted to mg/l

Maximum/day in mg/l		30 day average in mg/l	
Lead	0.19	Lead	0.07
Zinc	0.26	Zinc	0.08

Lead – max/day in mg/l = (0.0071)/((8.34)(0.004379)) = 0.0071/0.03652 = 0.19 mg/l

Lead – 30 day average in mg/l = (0.0024)/((8.34)(0.004379)) = 0.07 mg/l

Zinc – max/day in mg/l = (0.0094)/((8.34)(0.004379)) = 0.0094/0.03652 = 0.26 mg/l

Zinc – 30 day average in mg/l = (0.0031)/((8.34)(0.004379)) = 0.08 mg/l

City of Durant Pretreatment Waste Ordinance (Ordinance 1590)

Parameter	Maximum Concentration in mg/l (unless otherwise specified)
Zinc	12.3
Lead	0.41
pH	Between 6.0 su and 10.0 su
Temperature	110 degrees F

Note: The maximum concentration for lead in Ordinance Number 1590 is more stringent than Pretreatment Standards 420.95 so it will be used for maximum concentration. pH and Temperature are also used from Ordinance Number 1590. All other limits are derived from Pretreatment Standards because they are more stringent than Ordinance Number 1590.