

# NORTHWESTERN LANCASTER COUNTY AUTHORITY

Lancaster County, Pennsylvania

---

## NON-RESIDENTIAL WASTE DISCHARGE APPLICATION INSTRUCTIONS

---

### Section A – General Information

**1 to 3. Self-explanatory**

**4. Name of Authorized Representative**

In providing information to the Northwestern Lancaster County Authority (Authority), including the information in the application, you must provide certification by a responsible official. The **Authorized Representative** must be one of the following:

- For a corporation: A principle executive officer of at least the level of vice president;
- For a partnership or proprietorship: a general partner or proprietor;
- For other organizations: A principle executive officer or a director having responsibility for the overall operation of the discharging facility; OR
- A duly authorized representative of the individual described above if such representative is responsible for the overall operation of the facilities from which the discharge originates and provided that the authorization is provided in writing.

If you elect to appoint a representative under the fourth option above, the appointment must be in writing, by a responsible corporate official as described, and must accompany the application. If a Non-Residential Waste Discharge Permit is issued to the applicant, the Authorized Representative will be expected to sign the reports required to be submitted by the permit.

**5. Self-explanatory**

**6. Type of Discharge**

If your facility is not now connected to the sewer system in any way, and you are not scheduled for connection, please confirm this in a letter signed by the Authorized Representative and return the application with only Section A, items 1 through 5 completed. If your facility is, or is scheduled to be connected to sewer service, continue to item 7.

**7. Nature of the Discharge**

If your facility does not discharge (or have the potential to discharge) any non-residential waste to the sewer system, you do not need to complete all portions of the application. However, you must still provide an application to the Authority, with specific sections (as detailed below) completed. “Non-Residential Waste” encompasses a variety of discharges and is defined in the instructions below for question B.1. If your facility’s only

discharge to the sewer system is from restrooms, drinking fountains, etc. and there are no other potential sources of discharge (such as floor drains that could allow spills or leakage of chemicals to enter the sewers), then you do not have to complete Sections C through H of the application. In such a case, answer question 7 “No “, answer question B.1, and then proceed to Section I of the application. You will also need to certify the accuracy of the completed application by signing the certification statement in Section J. Note that shop sinks and other similar kinds of “clean-up” facilities are considered possible sources of non-residential waste unless you certify that such facilities do not receive any non-residential wastes. If there is any uncertainty, call the Authority to discuss this situation and arrange for a site observation.

If you DO have a discharge other than from restrooms, or a potential discharge through floor drains, shop sinks, or other means, answer this question “Yes” and proceed to the next question, question A.8.

**8. *Discharge of Cooling Water Only or Spill Potential Only***

If your facility discharges any non-residential waste (other than non-contact cooling water) to the sewer system, do not check any boxes in question 8 and continue to Section B of the application. Instructions for this portion of the application are provided below.

If the only routine or intermittent discharge of non-residential waste is of non-contact cooling water (water from cooling towers or equipment cooling, and which does not come into contact with raw materials, products or waste materials), check the box provided and complete ONLY the following sections of the application:

Questions to be completed for non-contact cooling water discharges:

- Section B, question 1: indicate the nature of the cooling water, cooling equipment used and the nature of the discharge/recycling.
- Section B, question 4: list any chemical used to condition the cooling water.
- Section E, question 1: estimate the volume of non-contact cooling water discharged to the sewer and the volume discharged to other points.
- Section F, questions 1 and 2: indicate the location of discharge of the cooling water to the sewer system.
- Section I: complete question 1 and follow instructions.
- Section J: the Authorized Representative must sign the certification statement.

Non-contact cooling water normally will not require a waste discharge permit, but the Authority may monitor its quality on occasion.

If there is NO DISCHARGE of non-residential waste, but floor drains or other facilities are present that pose a POTENTIAL for discharge (through a spill, leak, cleaning of containers, etc.), check the lower box on question 8 and complete ONLY the sections of the application listed below. If floor drains or shop sinks are routinely used to dispose of clean-up water, then you have a routine non-residential waste discharge and you should answer 7 “Yes” and complete the entire application:

Questions to be completed for potential discharges only:

- Section B: complete all questions.
- Section C: complete all questions.
- Section D: complete questions 5, 6 and 7.
- Section E: complete question 2.
- Section F: complete questions 1 and 2.
- Section I: complete question 1 and follow instructions.
- Section J: Authorized Representative must sign the certification statement.

If BOTH non-contact cooling water and floor drains are present, check both boxes in question 8 and complete all of the sections itemized above for both situations.

## **Section B – Product or Service Information**

### **1. *Describe the activities that produce non-residential waste***

Non-residential waste is defined as:

“any solid, liquid or gaseous substance or form of energy which is produced as a result, whether directly or indirectly, of any industrial, manufacturing, trade or business process or activity, or in the course of developing, recovering, or processing of natural resources, but not sanitary sewage.”

Non-residential waste includes cooling water used to cool machinery or processes, boiler blowdown, water from cleaning operations (including routine cleaning of equipment and buildings), water from plating and rinsing operations, discarded product or intermediate materials, and waste from all kinds of industrial processes. Pollution control equipment such as air scrubbers may also generate a liquid waste stream that is considered a non-residential waste. Non-residential waste can also be generated by spills or leaks of stored chemicals; therefore certain storage and warehousing operations may be considered potential sources of non-residential waste if there are floor drains, sumps or other means for such wastes to enter the sewer system. The characterization as “wastewater” does not require that the water discharged be contaminated. Otherwise clean cooling water is considered a non-residential waste. “Sanitary Wastewater” is not non-residential waste and consists of the types of sewage that are normally discharged from private residences: bathrooms, cleaning dishes, sinks, showers, etc. Rainwater and stormwater shall not be discharged to the sewer system. However, if storm drains are connected to the sewers, and if the stormwater runoff contacts stored raw materials or waste, then this is also non-residential waste.

You do not need to describe “dry” processes, or those in which water is recycled and not discharged. If your processes generate waste that is not discharged to the sewer system (for instance waste solvents that are drummed and sent to a recycler) this waste must also be reported. Section I of the application provides a place to discuss this waste, but it must also be listed in Section B.

**2. Self-explanatory**

**3. Check Appropriate Industrial Activities**

The activities listed in question B.3 are those of particular interest. Many industrial activities that can be characterized by these terms are EPA “Categorical” industries. For a description of Categorical industrial processes, see the instructions for question E.3 of these instructions.

**4. List of Materials**

Include on the list of materials any chemicals that are stored or used in quantities of at least 25 pounds or 25 pounds per month, except for household type chemicals such as detergents and window cleaners. Include maintenance chemicals stored, such as motor oil, gasoline, water treatment chemicals, etc.

**Section C – Plant Operational Characteristics**

**1 to 6. Self-explanatory**

**Section D – Water Usage**

This section generally requests information about the use of the water in various ways, and where it ends up. Section D provides three separate tabulations of water use. Please review the instructions below and assemble the information requested before completing questions 5, 6, 7 and 8.

**1 to 4. Self-explanatory**

**5. List Average Water Use**

Estimate the quantities of water that are used in each of the listed areas. Although some of this water may evaporate or otherwise not be discharged to the environment, the water use should be reported anyway. “Cooling water” includes water that is used in cooling towers for building air conditioning as well as water that is used to cool machinery. “Boiler feed” is self-explanatory. “Process water” includes water that is incorporated into a product, water used to clean, rinse or cool a product, and other uses of water that occur as part of the manufacturing process. “Sanitary” uses include water used for showers and wash stations for employees, toilets and drinking water. “Equipment washdown” includes water used to clean or sanitize the equipment or facilities. These figures may be estimated, but the total water use should be approximately the same as the water use measured by the water meter.

**6. Tabulation of Wastewater Discharges and Other Water Losses**

This item is intended to show where the water that comes in to the facility eventually goes. This includes discharge to the sewer, evaporation, water contained in a product, waste hauled by contract haulers and direct discharges to the environment (such as some cooling water discharges). The total water losses in question 6 should equal the total water used in question 5. Estimates are acceptable.

**7. Schematic Flow Diagram**

Show where potable water goes, including water that is contained in chemicals added to the process, and where wastewater is discharged. Evaporated water can be shown by an arrow pointing up and the notation “evaporated”. As for the other questions, flows can be estimated.

**8. Process Water Use**

The information in this question is restricted to process water (item ‘c’ in question 5 and item ‘a’ in question 6). Notes that item ‘e’ is the water used by the process and items ‘h’ and ‘i’ are the wastewater discharge volumes. If some process water is contained in the product, or is evaporated, there will be a lower discharge volume than water use volume. Processes A, B and C are the process indicated by the SIC codes in question B.2. If the various process discharges cannot be identified easily in this way, provide a description of each process listed in question 8 on a separate sheet. You should also indicate these process discharges on the schematic you provide for question 7.

**9. Self-explanatory**

**Section E – Wastewater Information**

This section focuses on wastewater that is discharged, either to the sewer system or to the environment. Other water losses such as evaporation or incorporation in a product are tabulated in the previous section and are not included in this section.

**1. Wastewater Discharges**

Provide estimates of the wastewater discharged to the sewer in the left column, and to any other points (such as direct discharges of cooling water to a stream) in the right column, for each water use. Information for process wastewater (processes A, B and C) should agree with the discharge information in Section D, question 8. Note that most direct discharges to the environment require an NPDES Discharge Permit as administered by the Pennsylvania Department of Environmental Protection (PA DEP). If you have such a permit, report the permit number in the space provided.

The total discharge to the sanitary sewer reported in the left column should equal the total reported in question D.6 item ‘a’. The total discharged to other points should equal the total reported in question D.6 item ‘b’.

**2. Self-explanatory**

**3. Categorical Pretreatment Standards**

If you checked any of the boxes in question B.3, your facility might be subject to National Categorical Pretreatment Standards. These standards are found at 40 CFR Sections 405 through 472. If you are not sure if a Categorical Pretreatment Standard applies to your facility, check the “Don’t Know” box and the Authority will assist in making that determination. If Categorical Pretreatment Standards apply to your facility and you were not previously aware of this, certain minimum reporting requirements are probably overdue.

In order to come into compliance with the federal regulations, you may wish to obtain the services of an environmental consultant to help you understand the EPA requirements and how to comply with them.

## **Section F – Sewer Information**

### **1 to 4. Self-explanatory**

## **Section G – Wastewater Pretreatment**

Wastewater pretreatment includes any steps taken to change the nature of the wastewater that is discharged to the sewer system. For example, grease traps, sedimentation basins, pH controls and other such treatment units should be reported as well as more elaborate treatment processes that you may employ.

### **1 to 3. Self-explanatory**

## **Section H – Characteristics of Discharges**

### **1. Inventory of Chemicals**

The extensive list of chemicals in question 1 is included to allow a comprehensive evaluation of the wastewater characteristics. To complete this table efficiently, you may rely on general sources of information readily available to you. These include manufacturer's safety data sheets (MSDS) for materials used in the facility, label information and manufacturers' literature. Please try to report comprehensively. There are five possible responses for each chemical. Their meanings are discussed below.

- **No Response.** If no response is provided for a particular chemical (no box is checked), the response is interpreted to be that, after reasonable inquiry, you have no information about the chemical. You are required to make a reasonable inquiry and a "no response" in this section will imply that you have investigated this chemical and have been unable to determine if it is present or not. The Authority may require wastewater testing for confirmation purposes for those chemicals for which no response is provided.
- **Known Present.** If the substance is known to be in use at your facility, AND if it was detected in an analysis of your wastewater, then check this box.
- **Suspected Present.** If the substance is known to be present in raw materials, is produced in the facility, or is otherwise known to be normally present at the facility, but no testing has been done to see if it is in the wastewater, then check this box.
- **Not Detected.** If you have analyzed your wastewater discharge for a substance and it has not been detected, check this box. This might apply even if the substance is known to be used in the facility but there is no reason to believe that it might be in the wastewater AND testing has confirmed this.
- **Suspected Not Present.** If, based on a review of available information, you do not believe a particular chemical is used at your facility, you should check the box under "Suspected Not Present". Checking this box implies a higher degree of investigation than checking no box at all.

**2. Wastewater Analysis Results**

(Note: you do not have to complete this part if you answered “No” to question A.7, OR if you checked one of the boxes in question A.8, indicating that there is no routine discharge of non-residential waste). You are required to obtain a representative sample of your facility’s wastewater discharge and to have a laboratory test it for the substances listed on the table in this question AND for all of the substance for which you checked “Known Present” or “Suspected Present” in question 1. The sample should be composed of several (at least 4) grab samples taken at different times and mixed together, or (preferably) can be obtained by use of an automatic sampling device. The samples should be taken throughout a normal working day, including production and clean-up activities, and combined for analysis as a single sample. You should obtain the assistance of the laboratory you select in determining the point of sampling and how to go about obtaining samples. The Authority may also be contacted for advice and assistance in selecting a sampling point and plan. Obtaining and analyzing the samples is the responsibility of the non-residential user, not the Authority, and the application will be considered incomplete if this information is not provided when required.

**3 to 5. Self-explanatory**

**6. Hazardous Waste Reporting**

All non-residential dischargers that discharge hazardous waste to domestic sewers are required by federal regulations (at 40 CFR 403.12(p)) to report the nature and volume of these discharges to the local authority, PADEP and EPA. This portion of the application provides an opportunity to make the required report to the local Authority if you have not already done so. Note that the discharge of many hazardous wastes to domestic sewers is not prohibited. Reporting such discharges is not normally an admission of any illegal activity, but failure to report when required may result in imposition of penalties by EPA.

If your facility does discharge hazardous waste to the sewer system, you are required to report the information indicated and to sign the certification statement. You must have in place a program of the nature described in that statement. If you do not have such a program in place, the Authority can assist you in determining what your requirements are.

Because this section of the application has to do with federal regulations, errors or false statements made in answering the questions may subject the applicant to penalties by EPA or PADEP. Therefore, the applicant may wish to retain the services of an environmental consultant to advise you as to your rights and responsibilities under these regulations.

**Section I – Non-Discharged Waste**

This section provides information about any waste that is NOT disposed to the sewer system. This information is important for the Authority in assessing the potential for spills and leaks, and may be used to verify that waste is properly disposed of. If no waste, other than normal office trash is generated on site, indicate so in question 1 of

this section and proceed to Section J of the application. If such waste is generated, provide information about its nature and volume and how it is disposed of in the remainder of this section.

**1 to 7. Self-explanatory**

**Section J – Certification**

Whether you have completed the entire application or only required portions of the application (as per these instructions), you must certify that the information provided is correct. The Authorized Representative reported in question 4 must sign this certification.

Please note that the applicant may be subject to penalties for providing false information to the Authority. Therefore, the Authority recommends that the applicant review the information provided in the completed application before signing and submitting it.

Also note the requirements of the applicant to correct any errors and to incorporate facility changes in the application, if errors are discovered or facility modifications are made after the application is submitted to the Authority. The Authority's Non-Residential Waste Program requires any non-residential user, who changes his facility's processes or operations in a manner that affects the quantity or quality of the non-residential waste discharged to the sewer system, to provide notification and updated facility information to the Authority in a timely manner. The Authority may require the non-residential user to submit a new application. The Authority is not responsible for requesting updated facility information from non-residential users.

If the information provided in this application indicates to the Authority that your facility requires a Non-Residential Waste Discharge Permit, the completed application will serve as an application for a Non-Residential Waste Discharge Permit, saving the applicant the effort of completing another form. Because the Authority will rely on the information provided in the completed application, the application must be correct and complete. Permit conditions will be based on the information provided and certified in the application and will not be revised if errors or omissions in your responses lead to more onerous provisions than would otherwise be necessary.