APPENDIX D

Sample Fact Sheet Template

Disclaimer

The U.S. Environmental Protection Agency (EPA), Office of Wastewater Management, Water Permits Division has prepared this sample fact sheet template for use by the Control Authority as a guide to developing its own fact sheets for use in the permitting process. The Control Authority may choose to develop its own fact sheet or use a modified version of the EPA fact sheet. If the Control Authority chooses to model its fact sheet on the sample, the Control Authority will want to tailor the sample fact sheet to reflect conditions at its publicly owned treatment works (POTW) and applicable state and local law requirements. As an aid to the Control Authority, the template contains blanks or brackets to identify areas that might need modification to reflect circumstances at the POTW. The sample fact sheet template has additional bracketed notes that explain issues the Control Authority should consider when developing fact sheets for use in its permitting process.

APPENDIX D. SAMPLE PERMIT FACT SHEET

PERMIT FACT SHEET

[Enter Issuance Date, Renewal Date, or Amendment Date of permit]: [Today's Date]

[Note: The permit writer must modify the permit fact sheet to each specific industrial user to best suit its needs.]

A. INDUSTRIAL USER INFORMATION

[Name of Facility] [Facility Location Address] [City, Zip Code]

[Contact Person Name], [Title] [Telephone Number]

[Permit Number]

B. DESCRIPTION OF FACILITY OPERATIONS

[Name of Facility] is primarily engaged in the manufacturing of [Products] [SIC Code and/or NAICS Code].

[Describe the process unit operations conducted at the facility]

[Name of Facility] began operations began at the facility in [Date]. [Name of Facility] employs [Number of employee] personnel and operates [Number of days] per week.

C. SAMPLE POINT DESCRIPTION/FACILITY FLOW INFORMATION

INDUSTRIAL WASTEWATER PERMIT	SAMPLE POINT	FLOW PER OPERATIONAL DAY (GPD)		DESCRIPTION
		TOTAL	PROCESS	
[Number]	[Number]	[Flow]	[Flow]	[<i>Describe</i> sample point location along with expected pollutants discharged]
TOTAL		[Total	[Total	
IUIAL		flow]	flow]	

D. PROCESS UNIT OPERATION/FLOW INFORMATION

Process wastewater is generated from [*describe* the process unit operations that generate industrial wastewater].

The total amount of process wastewater generated from the above operations is [Number of gallons] gallons per day, based on [Number of operational days] operational days per week.

PERMIT NUMBER	SAMPLE POINT	PROCESS UNIT OPERATION CODE	PROCESS DESCRIPTION
[Number]	[Number]	[Code]	[Process description with a list of expected pollutants discharged]

E. DILUTION/AUXILIARY OPERATION/FLOW INFORMATION

[Note: The permit writer should select one of the following applicable conditions]:

[For IUs without dilution wastestreams]

There are no dilution wastestreams that combine with process wastewater.

[For IUs with dilution wastestreams]

The dilution wastestreams are generated from [Sources of dilution]. The dilution wastestreams combine with the wastewater at Sample Point [Sample point number] prior to discharging to the City sewer. The total dilution flow is [Total dilution flow in gallons] gallons per day.

[Note to permit writer: If there are dilution wastestreams combined with categorical wastewater prior to the sampling point, the combined wastestream formula must be used to calculate alternative categorical limits. Include sample calculations in Section O of the permit fact sheet.]

F. FLOW MEASURING DEVICE

[Note: Flow measuring devices are required in certain circumstances. Please refer to the *Industrial User Permitting Guidance Manual* for more information. The permit writer should select one of the following applicable conditions]:

[For IUs that do not have and are not required to install an effluent flow meter]

[Name of Facility] does not have an effluent flow meter and is not required to install or maintain an effluent flow meter.

[For IUs that do not have but are required to install an effluent flow meter]

[Name of Facility] is required to install or maintain an effluent flow meter.

[For IUs with effluent flow meter]

[Name of Facility] has installed a [type and make of flow meter] flow meter to monitor the wastewater flow discharge to the sewer system.

G. PRETREATMENT UNIT OPERATIONS

[Describe the pretreatment system operations conducted at the facility]

H. POLLUTION PREVENTION / BEST MANAGEMENT PRACTICES

[Name of Facility] has implemented the following pollution prevention practice(s) and/or best management practice(s).

[Insert a description of all pollution prevention practices and /or best management practices]

I. RATIONALE FOR MONITORING LOCATIONS / SAMPLING POINTS

[Note: The permit writer should document its rational for monitoring locations and sampling points. The documentation should include information regarding applicability for an end of process monitoring, end of pipe monitoring locations, or both (i.e., end of process for determining categorical Pretreatment Standard compliance and end of pipe for determining local Pretreatment Standard compliance).]

[Documentation of rationale for monitoring locations / sampling points]

J. RATIONALE FOR MONITORING FREQUENCY REQUIREMENTS

[Note: The permit writer should adequately document the rationale used for establishing the permittee's monitoring requirements. In addition, the permit writer should review both the minimum federal monitoring frequency and the minimum monitoring frequency established by its approved program before establishing monitoring frequency requirements.

Prior to implementing alternative monitoring frequency options less stringent that the federal requirement, the permit writer must ensure that the Control Authority has established the legal authority within its approved program to implement these options. Alternative monitoring frequency options include, but are not limited to:

- Reduced monitoring (40 CFR 403.12(e)(3))
- Monitoring waivers (40 CFR 403.12(e)(2))
- Classification of NSCIU (40 CFR 403.3(v)(2))
- Monitoring waivers in on the basis of specific categorical Standards]

[Documentation of rationale for monitoring frequency requirements]

K. RATIONALE FOR REPORTING REQUIREMENTS

[Note: The permit writer should adequately document the rationale used for establishing the permittee's reporting requirements. In addition, the permit writer should review both the minimum federal and the minimum reporting frequencies and requirements established by its approved program before establishing reporting frequencies and requirements.

Prior to implementing alternative reporting options less stringent that the federal requirement, the permit writer must ensure that the Control Authority has established the legal authority within its approved program to implement these options. Alternative monitoring frequency options include, but are not limited to:

- TTO certification
- Reduced monitoring reporting (40 CFR 403.12(e)(3))
- Monitoring waiver reporting (40 CFR 403.12(e)(2))
- NSCIU reporting (40 CFR 403.3(v)(2) & 40 CFR 403.12(q))
- Specific reporting requirements as listed in specific categorical Standards]

[Document monitoring reporting requirements]

Signatory Requirements

According to 40 CFR 403.12(I), periodic compliance reports must be signed by an authorized facility representative. [Name of Facility] has designated the following individuals as authorized facility representative(s).

Name	Title
[Name]	[Title]

L. RATIONALE FOR SPECIAL CONDITIONS

[Note: The permit writer should describe any special conditions imposed in the permit. Special conditions can include, but is not limited to special definitions, compliance schedules, equivalent mass limit requirements, equivalent concentration limit requirements, one time monitoring requirements, biomonitoring or other toxicity requirements, sludge disposal plans, or additional monitoring of pollutant that are limited in the permit in response to noncompliance.]

[Documentation of rationale for any special permit conditions.]

M. RATIONALE FOR EFFLUENT LIMITATIONS

[Note: Permit writer should discuss the basis for classifying the IU. Important information should include: 1) starting date of operation; 2) process operations; 3) process modification (if any); and 4) process wastewater flow rates. The documentation of the rationale for effluent limits should also include, but not limited to:

- The classification of existing versus new source, or the possibility that a CIU is subject to both existing and new source requirements (for CIUS)
- Cyanide effluent limits (whether compliance with either cyanide (Total) or cyanide (amenable) is more appropriate)
- Combined wastestream formula
- Production-based limits
- Total toxic organic monitoring or toxic organic management plan requirements
- Calculation of equivalent limits
- Site specific local limits
- Special local limit considerations

If alternative limits are established, the permit writer should include any applicable calculations in Section O of the permit fact sheet.]

[Include the list of the actual effluent limitations included in the permit and Document the rationale for those effluent limitations.]

N. RATIONALE FOR SAMPLE TYPE

[The permit writer should document its rationale for requiring composite sampling, grab sampling, or both. If composite sampling is required, the rationale should include whether flow proportional or time proportional composite sampling is more appropriate. In addition, the permit writer should include documentation of whether continuous monitoring is required.]

[Documentation of rationale for sample type.]

O. EXAMPLE CALCULATIONS

[Note: The permit writer should include the following if the CWF applies due to dilution and/or if an integrated facility]

The federal categorical pretreatment standards for [Name of Facility] were adjusted using the combined wastestream formula (CWF). The steps used to compute the alternative daily maximum and monthly average limits are as follows:

<u>Step 1:</u> Reference the combined wastestream formula from 40 CFR 403.6 (e):

$$C_{T} = \left[\frac{\sum_{i=1}^{N} Ci * Fi}{\sum_{i=1}^{N} Fi}\right] \left[\frac{F_{T} - F_{D}}{F_{T}}\right]$$

Where:

 C_T = Alternative concentration limit for the pollutant;

C_i = Categorical pretreatment standard concentration limit for the pollutant in

regulated stream i;

 F_i = Average (at least 30 day average) daily flow of regulated stream I;

 F_D = Average daily flow (at least 30-day average) of dilute wastestream(s);

 F_{T} = Average daily flow (at least 30-day average) through the combined treatment facility, including regulated, unregulated, and dilute wastestreams;

N = Total number of regulated streams.

<u>Step 2:</u> Calculation of the Alternative Daily Maximum and Monthly Average Limits:

[Include a sample calculation of an alternative daily maximum and monthly average limit using appropriate variable values. The permit writer should include a list of all variable used.]

O. EXAMPLE CALCULATIONS (Continued)

[For calculation equivalent mass limits for concentration limits]

<u>Step 1:</u> Calculate the equivalent mass limit for the daily maximum concentration Standard:

 $M_{DEQ} = 8.34 * Q_{AVG} * C_D$

M _{DEQ}	=	Equivalent daily mass limits, lbs/day
8.34	=	Conversation factor
Q _{AVG}	=	Actual Average Daily Flow, million gallons per day [Note to permit writer: The
		period of when the flow rate value was determined should be documented]
CD	=	Daily maximum categorical Pretreatment Standard, milligrams per liter

Step 2: Calculation the equivalent mass limit for the monthly average concentration Standard:

 $M_{MEQ} = 8.34 * Q_{AVG} * C_M$

M _{MEQ}	=	Equivalent monthly mass limits, lbs/day
8.34	=	Conversation factor
Q _{AVG}	=	Actual Average Daily Flow, million gallons per day
C _M	=	Monthly average categorical Pretreatment Standard, milligrams per liter

[Include sample calculations of production-based limits, including applicable production values and flow rates.]

P. SLUG DISCHARGE EVALUATION

The [Name of POTW] conducted a slug discharge evaluation of [Name of Facility] on [Date].

[Note: The permit writer should select one of the following applicable conditions:]

[For IUs required to develop and implement a slug discharge control plan]

The [*Name of POTW*] has determined that [*Name of Facility*] is required to develop and implement a slug discharge control plan.

[For IUs that have develop and implement a slug discharge control plan]

The [*Name of POTW*] has determined that [*Name of Facility*] is required to develop and implement a slug discharge control plan. The plan was submitted to the [*Name of POTW*] on [*Date*]. The plan was reviewed on [*Date*] to ensure it contained all of the minimum federal requirements as listed 40 CFR 403.8(f)(2)(vi).

[For IUs not required to develop or implement a slug discharge control plan]

The [*Name of POTW*] has determined that [*Name of Facility*] is not required to develop and implement a slug discharge control plan.

Prepared By: _	Date:
Reviewed By:	Date:
Revieweu by.	Date