Identifying and Permitting a New Facility

Presented by
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Portland, Oregon
“Stump-Town USA”
City of Roses

- >566,000 Residents
- >213,000 Rate Payers
- >2,300 Miles of Sewer Lines
- 96 Pump Stations
- 12,000 Industrial/Commercial
- 168 Permitted Facilities
Columbia Blvd. Treatment Plant
Industrial User Identification

- Business Licenses
- Pretreatment Inspections
- Oregon DEQ & DOT
- Stormwater Inspections
- Staff Knowledge
- Commercial Directories
- Fire Marshall
- Drive-by Observations
- Pollution Complaints
- Building Plan Review
- Water Bureau Records
Survey Process

- Survey 1
- Survey II
- Permit Application
Permitting Criteria

- Significant NCIU Industrial User
- Significant - Categorical Facility
- > 10,000 Gal. Process Wastewater (NSIU)
- Required to Pay High Strength Sewer Charges
Permit Limits

- Local Limits
- Categorical Limits
- Permit-Specific Limits
## Local Limits

<table>
<thead>
<tr>
<th>Metals (Total)</th>
<th>mg/ L</th>
<th>Non-Metals</th>
<th>mg/ L</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>0.2</td>
<td>Cyanide</td>
<td>1.2</td>
</tr>
<tr>
<td>Cadmium</td>
<td>0.7</td>
<td>Fats, Oil and Grease</td>
<td>110</td>
</tr>
<tr>
<td>Chromium</td>
<td>5.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Copper</td>
<td>3.7</td>
<td>Organics</td>
<td></td>
</tr>
<tr>
<td>Lead</td>
<td>0.7</td>
<td>Acrylonitrile</td>
<td>1.0</td>
</tr>
<tr>
<td>Mercury</td>
<td>0.010</td>
<td>Chlordane</td>
<td>0.03</td>
</tr>
<tr>
<td>Molybdenum</td>
<td>1.4</td>
<td>Chlorobenzene</td>
<td>0.20</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.8</td>
<td>Chloroform</td>
<td>0.20</td>
</tr>
<tr>
<td>Selenium</td>
<td>0.6</td>
<td>1,2 Dichloroethane</td>
<td>0.5</td>
</tr>
<tr>
<td>Silver</td>
<td>0.4</td>
<td>2,4 Dinitrotoluane</td>
<td>0.13</td>
</tr>
<tr>
<td>Zinc</td>
<td>3.7</td>
<td>Nitrobenzene</td>
<td>2.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Pentachlorophenol</td>
<td>0.04</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Trichloroethylene</td>
<td>0.20</td>
</tr>
</tbody>
</table>

- Metals (Total)
- Non-Metals
- Organics
- 5 ≤ pH ≤ 11.5
Categorical Standards

- 40 CFR 413 Electroplating
- 40 CFR 419 Petroleum Refining
- 40 CFR 428 Rubber Manufacturing
- 40 CFR 433 Metal Finishing
- 40 CFR 437 Centralized Waste Treatment
- 40 CFR 439 Pharmaceutical Manufacturing
- 40 CFR 442 Transportation Equipment Cleaning
- 40 CFR 446 Paint Formulating
- 40 CFR 447 Ink Formulating
- 40 CFR 455 Pesticide Chemicals
- 40 CFR 464 Metal Molding and Casting
- 40 CFR 467 Aluminum Forming
- 40 CFR 469 Electrical and Electronic Components
Permit-Specific Limit

- Case-by-case basis
- Technical evaluation
  - Are not amenable to treatment
  - May cause pass through or interference
  - May create worker health and safety problems
Current Permit-Specific Limits

- BOD
- TSS
- TDS
- pH
Case Study
“How not to wake the neighborhood”
What Happened?

- Existing Industry
- Centralized Waste Treater
  - Subcategory B
  - Septage Treatment
  - Grease Trap Treatment
What were the Challenges?

- Odor Problems
- Neighborhood Association Complaints
  - Made the Local News
  - Zoning Concerns
  - Traffic Problems
  - City Council got involved
- Pretreatment Code does not have jurisdiction over air quality
Solutions

• Participate in neighborhood meetings
• Require IU to install odor abatement equipment
• Place facility under a Compliance Order
• Issue Notice of Termination
• Triggered Land Use Review Hearings
• Limit IU activities to non-waste related activities
• Modify Industrial Discharge Permit
What We Learned

- Start the Process at Planning Department
- Involve All Stakeholders
- Go Through Public Notification
- Zoning Problems can be complicated
- Pretreatment won’t solve all IU Problems