

# **Pretreatment Program Standard Operating Procedures**

United States Environmental  
Protection Agency  
Administrative Order

Order: CWA-02-2013-3058 and  
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**City of Middletown  
Orange County, New York**

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# Section 1

## Introduction

### 1.1 Background

The Industrial Pretreatment Program for the City of Middletown, New York (City) has been created to protect the welfare of those living and working in the City and its natural environment. The Pretreatment Program is targeted at minimizing discharges of pollutants from industries located within the City. The Pretreatment Program can be used to assess existing industries or any future industries moving into the City for compliance with pretreatment regulations.

This Pretreatment Program Standard Operating Procedures (SOP) is a guide to the City's Pretreatment Program and provides the descriptions of the procedures necessary for both the City and Industrial Users to comply with the relevant regulations. This document can also be used as a reference for individuals working for the City's Pretreatment Program to understand their role in the overall program.

### 1.2 Purpose

The purpose of these Standard Operating Procedures is to supplement the information contained in the Program Structure and Procedures document, and to insure consistent application of the City's Pretreatment Program activities and to comply with 40 CFR 403 requirements.

### 1.3 Scope

The scope of the Standard Operating Procedures is to comply with the requirements of 40 CFR 403.8(f)(2).

### 1.4 Responsibility and Authority

The City of Middletown Commissioner of Public Works and other staff under his guidance are responsible for implementing the pretreatment program procedures described herein.

### 1.5 Definitions

Definitions can be found in §389-1 from the City's Sewer Use Ordinance (SUO). Some specific definitions are indicated below:

Industrial User (IUs) - A source of indirect discharge. Indirect discharge refers to the introduction of pollutants into the City of Middletown's Sewerage Treatment Plant from any non-domestic source. For the purpose of this SOP, IUs generally refer to businesses that discharge to the City of Middletown's Sewerage Treatment Plant.

Significant Industrial User (SIUs) - Refer to §389-1 from the City's SUO. A significant industrial user is defined as any user that:

- Is subject to national categorical pretreatment standard issued by the United States Environmental Protection Agency (EPA);

- Discharges an average of 25,000 or more gallons of wastewater per day into the wastewater system, excluding normal domestic wastewater, non-contact cooling water, and boiler blowdown water;
- Contributes a stream of wastewater that makes up five percent or more of the average dry weather hydraulic or organic capacity of the City’s wastewater treatment plant; or
- Is deemed by the Commissioner to be a significant non-domestic discharge source that alone or combined with other sources may cause pass through, interference, or sludge contamination in the wastewater system (e.g. oil and grease facilities).

For the purpose of this SOP, all SIUs are considered IUs.

Categorical Pretreatment Standards or Categorical Standard- Any regulation containing pollutant discharge limits promulgated by EPA in accordance with sections 307(b) and (c) of the Act (33 U.S.C. section 1317) that apply to a specific category of Users and that appears in 40 CFR Chapter I, Subchapter N, Parts 405-471.

## 1.6 Program Organization

The limited number of IUs in the City of Middletown reduces the overall scale of the Industrial Pretreatment Program (IPP). Given the reduced program size, the City will utilize existing resources and allocate staff to fill multiple roles to establish the IPP.

### 1.6.1 Pretreatment Reporting Year

The pretreatment reporting year shall begin January 1 and end December 31.

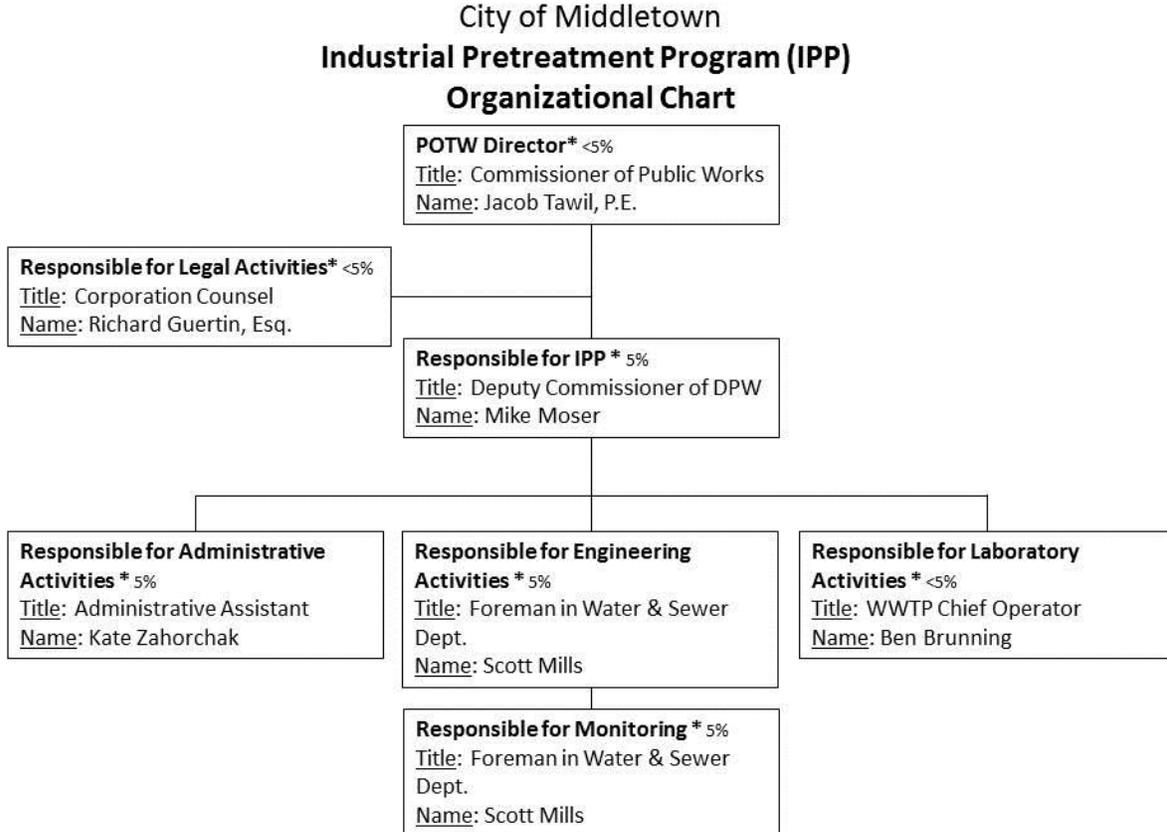
### 1.6.2 Organizational Plan

The following activities are included in the below organizational chart:

- Sampling and inspection
- Laboratory analysis
- Technical assistance
- Legal assistance
- Program administration
- Permit Issuance

Please see Figure 1 for proposed organizational plan for the City of Middletown’s IPP.

Figure 1 - City of Middletown's Industrial Pretreatment Program's Organizational Plan



\*Part-time positions with associated estimated overall percentage of time commitment to IPP

### 1.6.3 Staff Responsibilities and Qualifications

The following are the duties and qualifications for each role required for the IPP and will be referenced throughout this document:

**Commissioner of Public Works (Commissioner)** – See definition in Sewer Use Ordinance §389-1. Responsible for the overall administration of the IPP. Qualifications include experience in municipal government, communication with IUs, municipal finances and accounting, personnel, and public participation. The Commissioner will have the final authority to make decisions for the IPP and on industries involved in the program. The Commissioner is ultimately in charge of permit issuance. Qualifications include experience in management on the municipal government level and knowledge of the City's wastewater treatment system.

**Corporation Counsel** – Responsible for legal activities and matters providing legal assistance to the City related to interpretation of regulations and other legal documents that affect the pretreatment program operations and prepare contracts or other agreements. This person will also initiate formal Legal actions against violators, including injunctive relief when necessary. Qualified individuals should be authorized to practice as an attorney and counselor-at-law in the State of New York.

Deputy Commissioner of DPW (Deputy Commissioner) - Responsible for issuance of permits, communication with IUs, engineering activities and coordination of monitoring. Duties include evaluating data submitted by IUs to the City, reviewing monitoring and sampling analyses conducted by the POTW. This individual will be responsible for staffing and supervising field monitoring activities. Qualifications for this role include experience in field monitoring and sampling, wastewater treatment/ sewer collection systems and communication with local community.

Administrative Assistant – Responsible for administrative activities and providing assistance to the Commissioner and the Deputy Commissioner. Duties include updating all IU Inventories and providing IUs with requested documentation. Qualifications include experience in municipal government and data management.

Foreman for Water and Sewer Department – Responsible for assisting the Deputy Commissioner with engineering and monitoring activities. Duties include field activities related to collection of required data from IUs. This individual will be responsible for the implementation of required activities as determined by the Deputy Commissioner. Qualifications include experience in field monitoring and sampling, wastewater treatment/sewer collection systems.

WWTP Chief Operator – Responsible for inspections, laboratory activities and analysis. Qualifications include familiarity with sampling techniques and coordination with sampling laboratories. Sampling will be contracted through a commercial laboratory for analytical services. Laboratories must be certified by the State of New York and conduct tests in accordance with EPA approved methods.

## Section 2

# Industrial User Inventory and Determination

## 2.1 Industrial User Inventory

The Industrial User Inventory is an initial record of the current industries that discharge their waste to the City and their respective permit requirements for the Pretreatment Program. The inventory is managed by the Commissioner with assistance and organization from the entire pretreatment staff. The information in the Industrial User Inventory includes but is not limited to the following:

- Name of facility
- Type of facility
- Location of facility
- Owner and contact information
- Discharge volumes (daily average, yearly, peak)
- Pollutants the facility discharges with amounts
- Significant Industrial User or Categorical Industrial User Status
- Permit Status
- Reporting Status

### 2.1.1 Industry Inventory Updates

The industrial inventory will be updated periodically or as-needed, but no less than annually, to check for new IUs. The Administrative Assistant for the Pretreatment Program will be responsible for investigating various sources for new IUs which may include the following:

- Telephone directories
- City of Middletown's applications for site plan approvals and special use permits
- City of Middletown's wastewater service records
- Drive-by inspection within the City
- Water usage records
- City's interdepartmental communication including building permit applications

The Administrative Assistant will be responsible for developing a tentative list of changes to the IU inventory based on review of some or all of the above information. Following this, the

Administrative Assistant will submit the tentative list to the Deputy Commissioner and Sewer for review.

In addition, the Administrative Assistant will be responsible for updating existing IU's current information described above.

## 2.2 Industrial User Survey

All industrial users are required to fill out an Industrial User Survey (see Appendix A). This survey can be completed by hand or conducted over the phone. New industries identified through the industrial user inventory updates mentioned in Section 2.1 above will be required to complete the Industrial User Survey to determine if they are required to submit a discharge permit application.

Industrial User Surveys shall be updated at least once every five (5) years.

### 2.2.1 Survey Review

The Administrative Assistant will review all surveys for administrative completeness. Deputy Commissioner will perform a technical review of all surveys.

#### 2.2.1.1 Incomplete Submissions

The Administrative Assistant or Foreman of Water and Sewer Department will contact any respondents that submit incomplete surveys to solicit missing data via phone or via site visit. If the survey respondents do not provide missing data, the Administrative Assistant will notify the Deputy Commissioner and Sewer and the Corporation Council.

#### 2.2.1.2 Submission Not Returned

The Administrative Assistant or Foreman of Water and Sewer Department will attempt to contact respondents of submissions that are not returned via phone or via site visit. If respondents continue to avoid submission of the required survey, the Administrative Assistant will notify the Deputy Commissioner and Sewer and the Corporation Council.

### 2.2.2 Initial Inspections

The Deputy Commissioner will determine if an initial inspection is required based on the information provided in the Industrial User Survey.

If required, an initial on-site inspection will be performed by the Deputy Commissioner or the Water/Sewer Department Foreman. A description of the observations required for the field survey can be found at the bottom of the industrial user survey located in Appendix A.

### 2.2.3 Identification of Significant Industrial Users

The Commissioner will review Industrial Surveys as they are completed and determine whether an IU is considered a Significant Industrial User (SIU). If the industry is considered an SIU they will be required to submit a permit application and follow reporting requirements as described in the City's Sewer Use Ordinance (SUO).

An SIU will be contacted by the Deputy Commissioner or Administrative Assistant to inform them of their program status and the need to complete a permit application. If required, the SIUs can also be informed of current local limits found in the SUO and available IPP documents.

All information gathered from the permit application, site visits, sampling data will be included in the survey for industrial user survey file.

## Section 3

# Individual Wastewater Discharge Permit

## 3.1 Individual Wastewater Discharge Permit

SIUs designated during the industrial user survey evaluation (described in Section 2) will be required to complete a permit application form prior to being issued a permit from the City's IPP.

### 3.1.1 Application Form

After being initially contacted by the Deputy Commissioner on the requirement to file a permit application, the SIU should locate the permit application on the City's website or at the City's office located at the Department of Public Works. Following are timeframes for submission of required applications:

- If the SIUs are already connected to the City's sewer system, they will have 90 days to complete the application form from effective data of the City's SUO.
- Proposed new SIUs shall file their application at least 90 days prior to connecting to the City's sewer system in accordance with §389-50B of the City's SUO.

The permit application form can be found in Appendix B and includes all required content as described in the City's SUO.

### 3.1.2 Issuance of Permit

#### 3.1.2.1 General

All permits applications submitted to the City shall be initially checked for completeness and consistency by the City's Administrative Assistant and then verified by the Commissioner. If the permit application is found incomplete or discrepancies are discovered, the Deputy Commissioner will contact the SIU and provide guidance necessary to resubmit the application.

Once the permit application is deemed administratively complete, the Deputy Commissioner will complete a technical review of the SIU's application. Laboratory results will be included in the Deputy Commissioner's review of the permit application. The Deputy Commissioner must reference the City's local limits and Discharge Screening Levels found in Appendix C of this SOP. Parameters in excess of discharge screening levels must be analyzed further for potential inclusion in the SIU's Wastewater Discharge Permit as limit or monitoring requirement.

If discrepancies are found in the data or information provided by the SIU, the Deputy Commissioner will coordinate with the Commissioner prior to responding to the SIU.

#### 3.1.2.2 Sampling Frequency

All parameters believed present in IU's discharge shall be sampled twice a year. If IU's discharge is found to be variable, sampling will be required four times a year. A discharge is considered variable if flows are greater than 5,000 gpd and constituents found in wastewater vary over time or days. The annual sampling frequency is as follows:

Discharge Type	Sampling Frequency (per year)
Consistent	2
Variable	4

EPA's policy is that all local limits are included in permits and that for those pollutants that are believed absent, that the monitoring frequency can be once every three years or the life of the permit (whichever is less).

### 3.1.2.3 Final Approval

The Commissioner will have 30 days from the date the application was deemed administratively complete to determine whether to issue an Individual Wastewater Discharge Permit. Once the permit has been drafted by the Deputy Commissioner, the SIU will be issued a permit number and date. The permit duration will be a maximum of 5 years or less as determined by the Commissioner.

The Commissioner will publish in the official daily newspaper of the City a notification of issuance of pretreatment permit, at least (14) days prior to issuance. The notice should include the location where the draft permit may be review and an address where written comments may be submitted.

A final copy of the permit will be provided to the SIU for their files. The permit will include, but is not limited to, the following information:

- statement of permit duration (no more than 5 years);
- statement of non-transferability of permit without prior notification to the City and provision of a copy of the existing control mechanism to the new owner/operator;
- local discharge limits;
- statement of applicable civil and criminal penalties for violation of pretreatments standards and requirements;
- and self-monitoring, reporting, notification and record keeping requirements.

The SIU will be asked to resubmit the permit application 180 days prior to permit expiration to include any facility changes or new discharges.

An example of a Wastewater Discharge Permit can be found in Appendix D.

## Section 4

# Reporting Requirements

The SIUs are to submit various reports in order to comply with their individual permit requirements. The tracking and review of these reports will be completed by the Deputy Commissioner. The SUO contains provisions that apply if an SIU fails to submit reports by the dates required in their individual permit.

Report requirements and templates will be made available to SIU through the City's website or at the City's office located at the Department of Public Works. The requirements for reporting can be found in the City's SUO and summarizes below.

### 4.1 Baseline Monitoring Reports

The baseline monitoring reports are required for Categorical Industrial Users (CIUs). Please see Section §389-51A of the City's SUO for specific time requirements and information necessary to include in the Baseline Monitoring Reports.

A Baseline Monitoring Report template can be found in Appendix E of this document.

### 4.2 Compliance Reports

#### 4.2.1 Reports on Compliance with Categorical Pretreatment Standards

The Reports on Compliance with Categorical Pretreatment Standard Deadline are required for CIUs. Please see Section §389-51B of the City's SUO for specific time requirements and information necessary to include in the report.

A Report on Compliance with Categorical Pretreatment Standard Deadline template can be found in Appendix F of this document.

#### 4.2.2 Periodic Compliance Reports

As indicated in an SIU's discharge permit, periodic compliance reports are required once every six months. These reports shall include measurements of wastewater discharge flow and concentration of pollutants permitted through the IPP. Please see Section §389-51C of the City's SUO for specific time requirements and information necessary to include in the Periodic Compliance Reports.

A Periodic Compliance Report template can be found in Appendix G of this document.

#### 4.2.3 Compliance Schedule Progress Reports

The Compliance Schedule Progress Reports are for SIUs to report commencement of the construction and operation of pretreatment devices required in order to meet pretreatment standards. Please see Section §389-51D of the City's SUO for specific time requirements and information necessary to include in the Compliance Schedule Progress Reports.

A Compliance Schedule Progress Report template can be found in Appendix H of this document.

## 4.3 Additional Reporting Requirements

### 4.3.1 Report of Changed Conditions

Each SIU must notify the Deputy Commissioner of any significant changes in SIU's operation or system that may impact its wastewater at least 30 days prior to the change. Please see Section §389-51E of the City's SUO for specific requirements to include in the Report of Changed Conditions.

The Report of Changed Conditions will be incorporated into the SIU's file and the Deputy Commissioner will work with the IPP staff to address these changed conditions.

### 4.3.2 Report of Potential Problems

An IU must notify the Commissioner or any of the IPP staff regarding events that could lead to noncompliance of its discharge. These potential problems may include, but are not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, a Slug Discharge, or Slug Load.

Five (5) days following the discharge, the IU shall submit a detailed report describing the cause of the discharge and future prevention measures.

Please see Section §389-51F of the City's SUO for specific requirements to include in the Report of Potential Problems.

The Report of Potential Problem will be incorporated into the IU's file and the Deputy Commissioner will work with the IPP staff and IU to address reducing these potential problems in the future.

### 4.3.3 Notifications

The IUs are required to provide the following notifications to the City pursuant to the SUO:

- Notification of Violation/Repeat Sampling and Reporting [Section §389-51H] – an IU must notify the Commissioner or Deputy Commissioner if it determines through self-performed sampling that a violation has occurred. Repeat sampling is required and the results must be submitted to the Commission or Deputy Commissioner within 30 days of the originally reported violation.
- Notification of Discharge of Hazardous Waste [Section §389-51I] – an IU must notify the Commissioner or Deputy Commissioner, EPA, and New York State of the commencement of the discharge of hazardous waste.

## Section 5

# Notifications and Enforcement

### 5.1 Notifications by the City

The City is obligated to notify IUs of any pretreatment requirements related to user charges, disposal of sewage sludge, hazardous waste, or solid waste.

The City is also obligated to notify any IUs who have been designated as SIUs of their status as such within 30 days of said designation.

The Deputy Commissioner will make notifications indicated above as required once authorized by the Commissioner.

### 5.2 Annual Inspections

The Water/Sewer Department Foreman will conduct annual inspections of permitted SIUs which may or may not be coordinated in advance. The right for the IPP to conduct unannounced inspections can be found in Section §389-38A of the City's SUO. The Water/Sewer Department Foreman will complete an Annual Inspection Report as found in Appendix I of this document.

The purpose of the Annual Inspection is to ensure compliance by the SIU with applicable Federal Pretreatment Standards and in accordance with 40 CFR 403.8(f). The Annual Inspection Report shall include:

- Inspection type, purpose, time, date, and name of inspector;
- Company general information;
- Water account information, sewer services, locations, and discharge points;
- Products produced, manufactured, and descriptions of processes;
- Process flow diagrams;
- Process tank descriptions;
- Chemical storage and descriptions;
- Pretreatment descriptions, processes, and flow diagrams;
- Waste management, generation, classification, and handling information; including slug control and toxic organic management;
- Facility layout and sample site diagram;
- Surcharge and combined waste stream information if applicable;

- Compliance status, pollution prevention, and sampling frequencies;
- SIU classification status

The Annual Inspection Report is signed by the Inspector completing the inspection and forwarded to the Deputy Commissioner for review and approval. Once approved, the report is returned to the Inspector for filing in the industry's file. The inspection reports, especially those referring to situations of non-compliance, must be returned to the SIU for review and correction, if required. The Annual Inspection may be used for; newly permitted companies, spill investigations, violation reviews, follow-up inspections, or for other purposes to ensure compliance by Significant Industrial Users (SIU).

### 5.3 Random Sampling

The City is obligated under 40 CFR 403.8(f)(2)(v) to conduct random sampling of IUs and conduct surveillance activities in order to identify, independent of any information submitted by the IUs, occasional and continuing noncompliance with required Pretreatment Standards.

At least once per year effluent from each SIU shall be sampled as part of this requirement for the City's local limits, applicable federal standards, and any additional parameters of interest identified in the Wastewater Discharge Permit.

Sampling indicated above shall be performed by the Deputy Commissioner, Water/Sewer Department Foreman, or the WWTP Chief Operator.

### 5.4 Short Inspections and Complaints

The Deputy Commissioner or Water/Sewer Department Foreman may conduct short inspections at any time to ensure that the SIU is meeting pretreatment standards. In addition, the Deputy Commissioner or Water/Sewer Department Foreman may conduct a site inspection unannounced if a complaint has been filed about a particular SIU. These short inspections logs will be reviewed by the Deputy Commissioner prior to the ultimate plan of action enforced by the Commissioner and Corporation Counsel.

### 5.5 Notice of Significant Noncompliance

An SIU is in significant noncompliance if its violation meets one or more of the following criteria as described in Section §389-52B of the City's SUO:

- (a) Chronic violations of Wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all the measurements taken for the same pollutant parameter taken during a 6 month period exceed (by any magnitude) a numeric Pretreatment Standard or Pretreatment Requirement, including Instantaneous Limits, as defined in City's SUO;
- (b) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of Wastewater measurements taken for each pollutant parameter during a six- (6-) month period equals or exceeds the product of the numeric Pretreatment Standard or Pretreatment Requirement, including Instantaneous Limits, as

- defined by Chapter 389 multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH);
- (c) Any other violation of a Pretreatment Standard or Pretreatment Requirement (Daily Maximum, long-term average, Instantaneous Limit, or narrative standard) that the Commissioner determines has caused, alone or in combination with other discharges, Interference or Pass Through, including endangering the health of POTW personnel or the general public;
  - (d) Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the Commissioner's exercise of his/her emergency authority to halt or prevent such a discharge;
  - (e) Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in an individual Wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;
  - (f) Failure to provide within thirty (30) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical Pretreatment Standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;
  - (g) Failure to accurately report noncompliance; and
  - (h) Any other violation or group of violations which the City determines will adversely affect the operation or implementation of the IPP.

The entire IPP staff is responsible to notifying the Deputy Commissioner of any acts of noncompliance from any of the SIUs. The Deputy Commissioner will then notify the Commissioner for evaluation and determination related to significant noncompliance. The Commissioner will immediately and formally notify any SIU found to be in significant noncompliance and work with the Corporation Counsel to determine penalties associated with significant noncompliance if applicable.

## 5.6 Public Notification

The City's Administrative Assistant will assist the Commissioner, at least once annually in February of each year, in publishing all instances of significant noncompliance that occurred throughout the previous pretreatment year in the Times Herald-Record in according with §389-52B of the SUO.

## Section 6

### Employee Training

The City will provide training to employees involved with the execution of the City's Pretreatment Program at least once per year.

The training will be led by the Commissioner and will include:

- Review of the goals of the pretreatment program
- Review of the history of pretreatment (for new employees)
- Pretreatment requirements in New York State
- Program Review
  - Major elements (SUO, SIU Permits, Surveys, Monitoring, Headworks Analysis, Sampling and Inspection, Enforcement Response Plan, Annual Reports)
  - Files
  - Inspection/Guidance/Training Opportunities
- Review of previous years records and compliance activities
- Discussion of recommendations for program modification

## Appendix C

### Discharge Screening Levels

The following tables provide discharge screening levels as found in “Appendix I-Discharge Screening Levels and Henry’s Law Constants for Organic Compounds” of the US EPA’s [Local Limits Development Guidance](#) (2004).

Wastewater Discharge Permit Screening Levels Based on Explosivity	
Parameter	Discharge Screening Level (mg/L)
Acrolein	13,163
Acrylonitrile	14,586
Benzene	169
Chlorobenzene	395
Chloroethane	222
1,1-Dichloroethane	909
1,2-Dichloroethane	5,221
1,1-Dichloroethylene	215
Trans-1,2-Dichloroethylene	571
1,2-Dichloropropane	1,326
Ethyl benzene	106
Hydrogen Cyanide	13,529
Hydrogen Sulfide	96
Methyl bromide	1,521
Methyl chloride	450
Methylene Chloride	4,307
Toluene	152
1,1,2-Trichloroethane	9,611
1,1,1-Trichloroethane	152
Trichloroethylene	1,029
Vinyl Chloride	88

<b>Wastewater Discharge Permit Screening Levels Based upon Fume Toxicity</b>	
<b>Parameter</b>	<b>Discharge Screening Level (mg/L)</b>
Acrolein	0.047
Acrylonitrile	4.822
Benzene	0.014
Bromoform	0.227
Carbon Tetrachloride	0.011
Chlorobenzene	2.29
Chloroethane	5.88
Chloroform	0.06
Dichloroethane, 1,1-	1.685
Dichloroethane, 1,2-	0.168
Dichloroethylene, 1,1-	0.016
Trans-Dichloroethylene,1,2-	2.04
Dichloropropane,1,2	4.289
Ethyl benzene	1.659
Hydrogen Cyanide	1.149
Hydrogen Sulfide	0.034
Methyl bromide	0.305
Methyl chloride	0.557
Methylene Chloride	4.139
Tetrachlorethane, 1,1,2,2-	1.847
Tetrachloroethylene	0.945
Toluene	2.075
Trichloroethane, 1,1,2-	1.601
Trichloroethane, 1,1,1	2.759
Trichloroethylene	0.026
Vinyl Chloride	0.012

The following table includes discharge screening levels and local limits obtained from the Final Headworks Analysis Report (2014). The report details the equations and variables used to calculate local limits in accordance with the US EPA's Local Limits Development Guidance (July 2004).

Wastewater Discharge Permit Screening Levels based on Headworks Analysis		
Parameter	% of MAHL (from Headworks Analysis)	Discharge Screening Levels (mg/L)
Arsenic	11%	1.13
Cyanide	16%	0.67
Mercury	17%	0.0024
Selenium	5%	0.43
BOD5	7%	22,442
TSS	19%	10,828
Ammonia	21%	568

Source: Table 13 of the Final Headworks Analysis Report. The screening levels are referred to as calculated local limits in the report.

The following table was obtained from Section 389-30 of the City of Middletown's Sewer Use Ordinance.

Parameter	City's Local Limits	
	Daily Maximum (mg/L)	Monthly Average (mg/L)
Cadmium	<b>0.39</b>	<b>0.26</b>
Chromium	<b>2.77</b>	<b>1.71</b>
Copper	<b>1.59</b>	<b>1.59</b>
Lead	<b>0.36</b>	<b>0.26</b>
Nickel	<b>3.98</b>	<b>2.38</b>
Silver	<b>0.43</b>	<b>0.24</b>
Zinc	<b>2.61</b>	<b>1.48</b>

Source: Section 389-30 of the City of Middletown's Sewer Use Ordinance