

Warwick Sewer Authority (WSA)

Introduction to the Permitting Process

Why does the WSA have an Industrial Pretreatment Program (IPP) and what exactly is an IPP?

Industrial Pretreatment Programs are mandated by the Federal Government through regulations found in 40 CFR Part 403. Essentially, these regulations require that Publicly Owned Treatment Works or POTWs, such as the WSA, establish procedures for enforcement of pretreatment standards and requirements. Pretreatment standards and requirements are established by the Environmental Protection Agency (EPA) under the Clean Water Act. It is the universal **mission** of IPP's located throughout our nation to protect sewer collection systems, wastewater treatment facilities and the waterways receiving the treated wastewater or "effluent". In RI alone there are presently 15 approved Town and City Pretreatment Programs responsible for protecting our waterways and ultimately, the integrity of one of RI's most treasured resources, the Narragansett Bay.

How does the WSA's IPP accomplish this mission?

In order to execute our IPP's mission, it is necessary to conduct a survey to determine the type, location, nature and amount of water use and characteristics of discharges to the WSA. On January 8th, 1984, a Resolution was adopted providing our IPP with the authority to require that our City's commercial and industrial facilities complete a Wastewater Discharge Permit Application. The application contains a series of questions developed to obtain critical information for characterizing a facility's wastestream profile and potential to impact our collection system and/or treatment plant. Once our characterization is complete our IPP issues the facility a site-specific, non-transferable permit. Important to note: Our IPP personnel are responsible for the administration of wastewater discharge permits for all Warwick based industrial and commercial facilities discharging wastewater, either directly or indirectly (via septage hauler), to the Warwick Sewer System.

I don't operate a business considered to be an "industry", why do I need an Industrial Wastewater Discharge permit?

Our IPP permits a variety of **industrial and commercial** facilities. You don't have to be an industry to have materials of concern in your wastestream. Our IPP must also consider chemicals stored or used in non-wastewater related processes at your facility; these chemicals have "potential" to be discharged accidentally to our collection system and must be stored and disposed of properly. The following table list some examples of the types of commercial facilities that our IPP permits and the reasons why these locations are permitted; please note that this list in the following table is not all inclusive of our permittees.

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Type of Facility	Some Materials of Concern
Medical/Dental	Heavy Metals: X-Ray Rinse Waters-Silver, Dental Amalgam-Mercury
Automotive Repair/Maintenance	Toxic Organics - Waste Oils, Antifreeze, De-Greasers, Paints and Solvents
Carwashes	Oils, Solids (sand and grit)
Food Prep and Sales	Conventional Pollutants: Fats, Oils and Grease or (FOG), Solids
Print Shops	Heavy Metals found in inks and dyes
Nursing Home/ Assisted Living	Pharmaceuticals, Kitchen wastes (FOG, Solids)
Laundries & Dry Cleaners	Solids (lint), high strength detergents, perchloroethylene dry-cleaning

The purpose of the permit is to provide the permittee with information regarding their responsibility in ensuring that they are not dumping materials “down the drain” that are prohibited from discharge and/or exceed limits as set forth in their permit. Adherence to discharge limits identified in the permit is extremely important; limits have been technically derived by engineers to prevent the release of toxic and conventional pollutants into our collection system that may impact not only the collection system, but quite possibly the WSA’s treatment facility and the environment.

What happens if I don't I comply with the WSA's request to complete the application form and provide the application fee?

The WSA’s IPP will often make more than one attempt to contact the User regarding delinquent forms and/or fee. When a User ignores or refuses to comply with our IPP’s requests, enforcement action must be taken.

Failure to complete the application form and pay the required application fee within the time specified (typically 30 days, unless the forms/fee are severely delinquent) is deemed a violation of the WSA’s Sewer Use Ordinance (SUO): Rules and Regulations. Violations of this nature are subject to an **Administrative Fine**. An Administrative Fine is a monetary penalty assessed by the Authority for violations of pretreatment standards and requirements. RIGL 45-6-2.3 authorizes the WSA to issue administrative fines. Delinquent application form and/or fee are subject to a fine of \$50.00 per day for each day the form and/or fee remain overdue. Please know, where our IPP has made more than one attempt to deliver the application form and/or has made more than one attempt to contact/request completion of the application form/provide fee, the WSA Board may assess penalties retroactive to the delivery date that the application forms were **first provided to your facility**. In addition to fines, failure to complete the application form and pay the required one-time application fee by the required due date will delay sign off on your Certificate of Occupancy, as well as, renewal of licenses your facility may have with the City of Warwick (for example, food service liquor license).

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Should our requests be completely ignored, an **Administrative Order** will be issued to the User. A **Show Cause Order** is a type of Administrative Order that directs the User to appear before the Authority, or its designated representatives, to explain its noncompliance and show cause why more severe enforcement actions against the User should not go forward. The order to show cause is typically issued after informal contacts or violation notices have failed to resolve the noncompliance. The WSA will require that the User or an alternate authorized representative of the User's company appear before the WSA's Board to show cause or demonstrate why the required application form and fee have not been submitted.

In extreme cases where the User remains non-compliant, i.e., refuses or continues to ignore requests, escalated enforcement action may be deemed necessary. Escalated enforcement action may include but is not limited to:

- Significant Non-Compliance Violation (name and violation is published in the Providence Journal and Warwick Beacon)
- Escalated Administrative Fines
- Termination of Service
- Civil Litigation

I'm having difficulty completing the application. Is there a person I can speak with for help?

WSA IPP personnel are happy to answer any questions you may have and help you through the application process. Please feel free to call our IPP staff for assistance. Please refer to the Pretreatment Contact Information link on the web page.

On behalf of our IPP we thank you in advance for your steadfast commitment to environmental protection through pretreatment compliance.