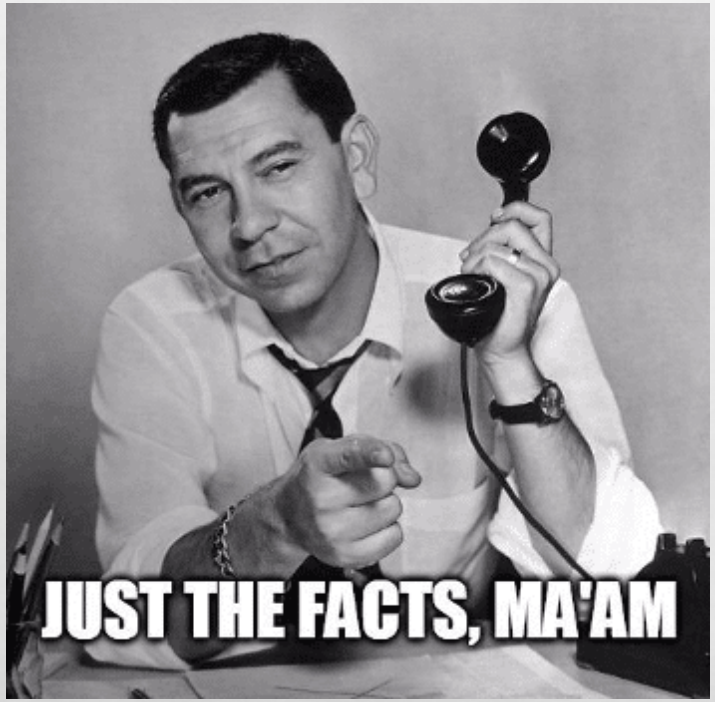
# JUST THE FACTS JACK

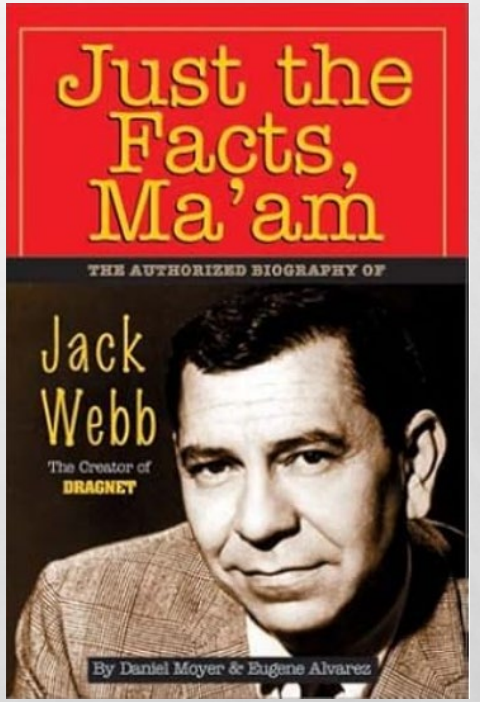
## A SURVEY OF INDUSTRIAL DISCHARGE PERMIT FACT SHEETS

Jill Hoyenga, Regulatory Compliance Manager
City of The Dalles

# JUST THE FACTS MA'AM

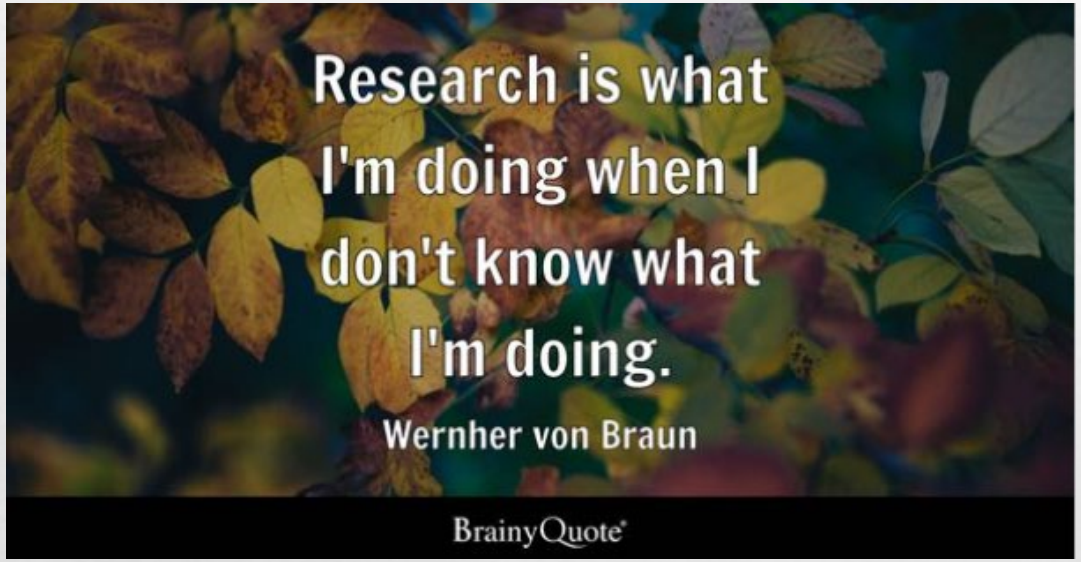



- Favorite "fact" meme: a quote from Sgt. Joe Friday of Dragnet played by Jack Webb.
- Except Joe Friday never said those exact words! The closest he came was "All we want are the facts, ma'am."
- However, the phrase was used as the title of Jack Webb's authorized biography.
- The primary task of the fact sheet author is to sort fact from fiction…then document findings.




Source: shmoop.com/quotes/just-the-facts-maam.html

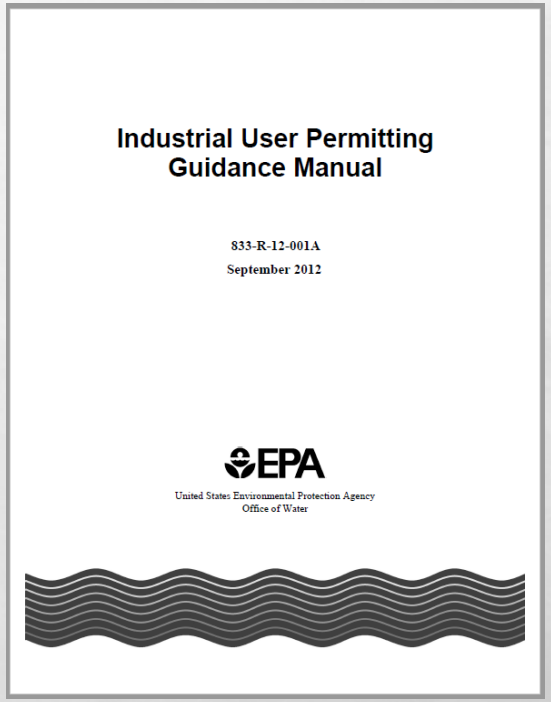
# OUR AGENDA




- Consult the permitting “bible”
- A survey of formats (thank you colleagues)
- U.S. EPA model fact sheet
- A fact finding checklist
- Delightful details to consider
- Final fact sheet considerations

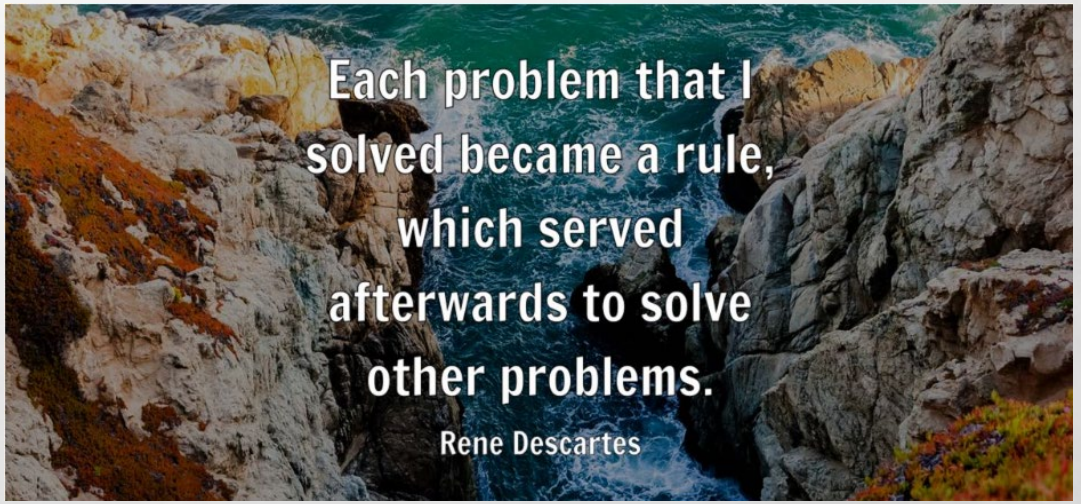
# CONSULT THE PERMITTING "BIBLE"

- Chapter 11. Documentation of permit decisions
- Principle reasons for documenting permit decisions:
  - Remind the permit writer and future staff of the basis of the previous permit
  - Document that permit conditions and modifications were developed in a reasonable, nonarbitrary manner and in accordance with proper procedures
  - Streamline future permitting issuances
  - Explain permit conditions and basis to IU and the public
  - Identify condition changes at permittee's facility or POTW that could result in a permit modification
  - To satisfy possible Approval Authority requirements for documentation of permit rationale

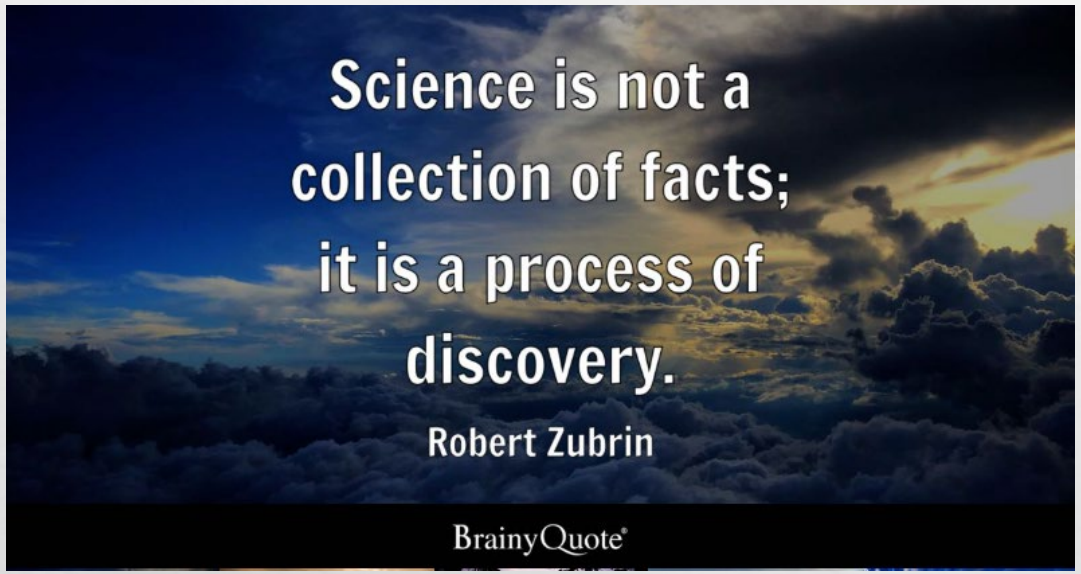


# ARE FACT SHEETS IN THE CFR?

- In a word, NO.
- Fact sheets are not required by 40 CFR 403, but they are strongly recommended by U.S. EPA.
- Some states include fact sheets in their program audit checklists and reference the guidance manual even though fact sheets are not in the Code of Federal Regulation (CFR).
- Fact sheets are considered best practice.



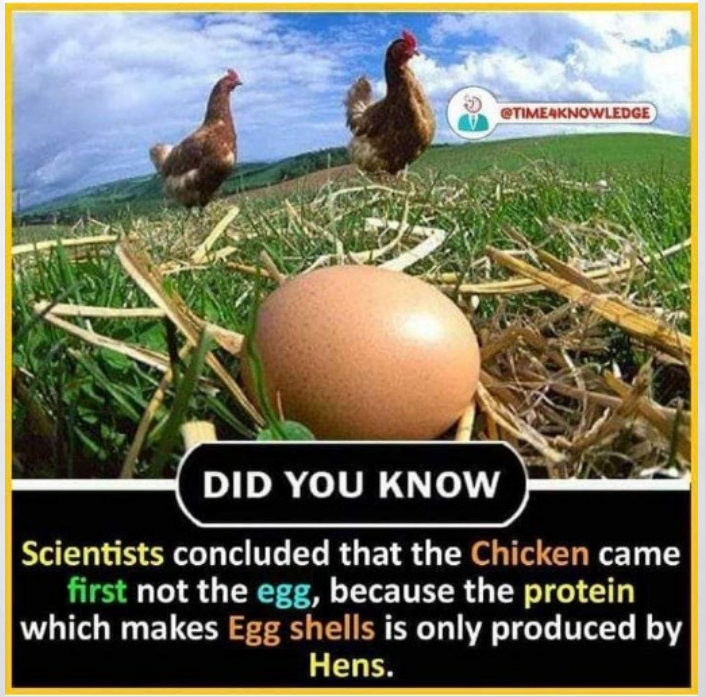
# A COLLECTION OF FACTS




- Brief description of Industrial User
- Type and quantity of the discharge
- Basis for the permit limits
- Detailed discussion of any special conditions in the permit and the rationale for pollutant selection and limits development
- Calculations showing the actual numbers used to derive each limit

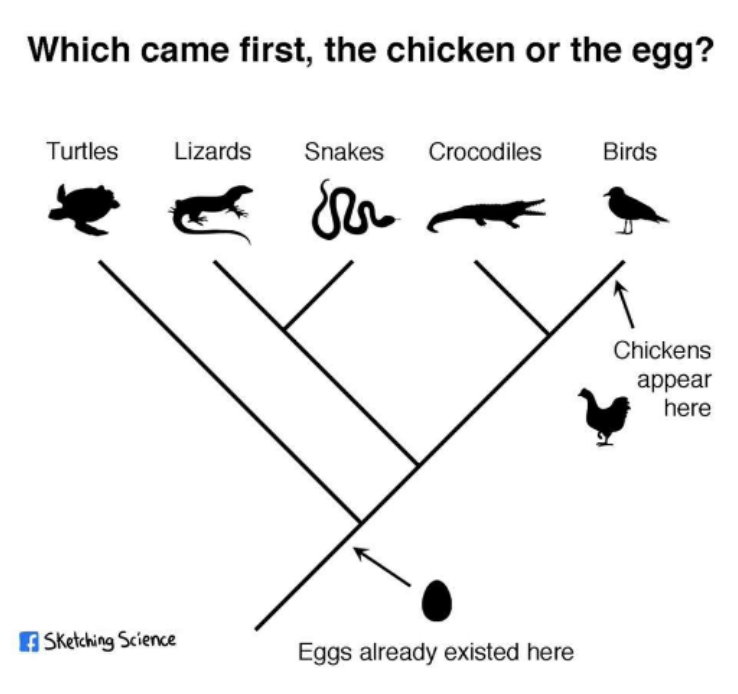
# WHICH CAME FIRST?

- Chapter 11: “After the permit has been drafted, the permit writer should create a permanent record of the procedures followed and the basis for the decisions made during the permitting process. Although such documentation might initially seem an unnecessary and a time-consuming task, it will inevitably play a critical role in any permit challenge, and, in the long run, it can save the permit writer a great deal of time and effort.”
- Pretreatment colleagues: “If you write the fact sheet first, the permit writes itself.”




Source: Memeroid Memes it.memedroid.com/memes/detail/3232359/I-came-first-in-the-chicken-on-the-egg

# WHICH CAME FIRST?

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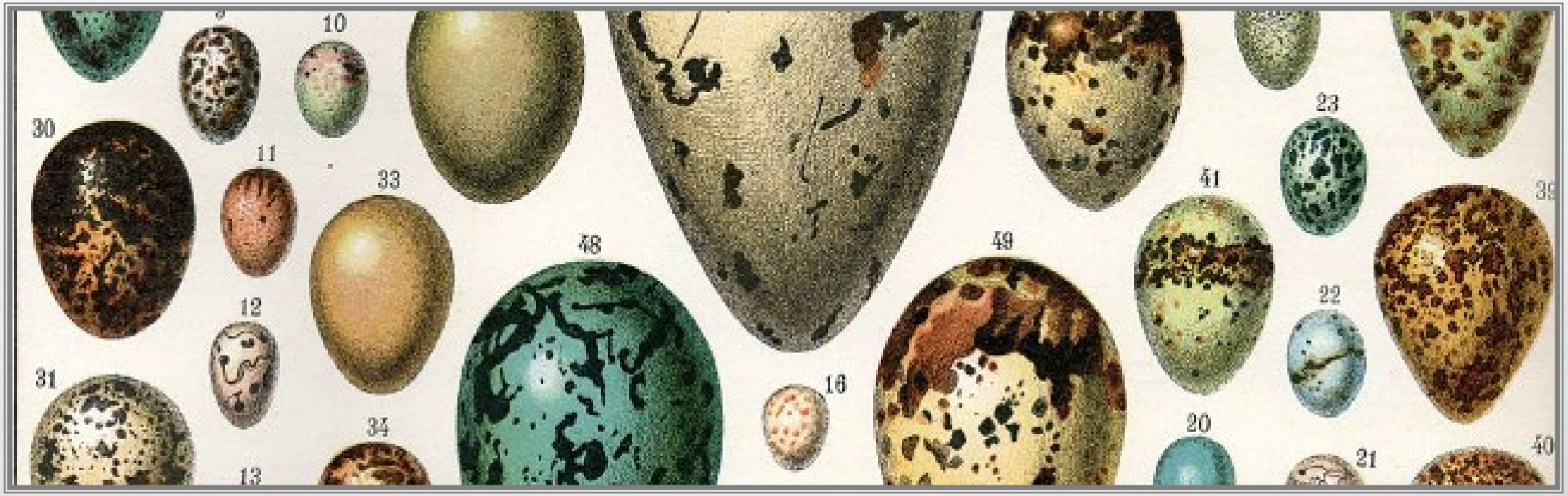
Source: Australian Academy of Science science.org.au/curious/earth-environment/which-came-first-chicken-or-egg




- “At the end of the day, the question is something of a false dichotomy. Eggs certainly came before chickens, but chicken eggs did not—you can’t have one without the other. However, if we absolutely had to pick a side, based on the evolutionary evidence, we’re on Team Egg.”
- Perhaps the question about fact sheets is also something of a false dichotomy. Which comes first, the permit or the fact sheet, is simply a matter of the permit author’s preference. However, if I absolutely had to pick a side, based on my experience, I’m on Team Fact Sheet.

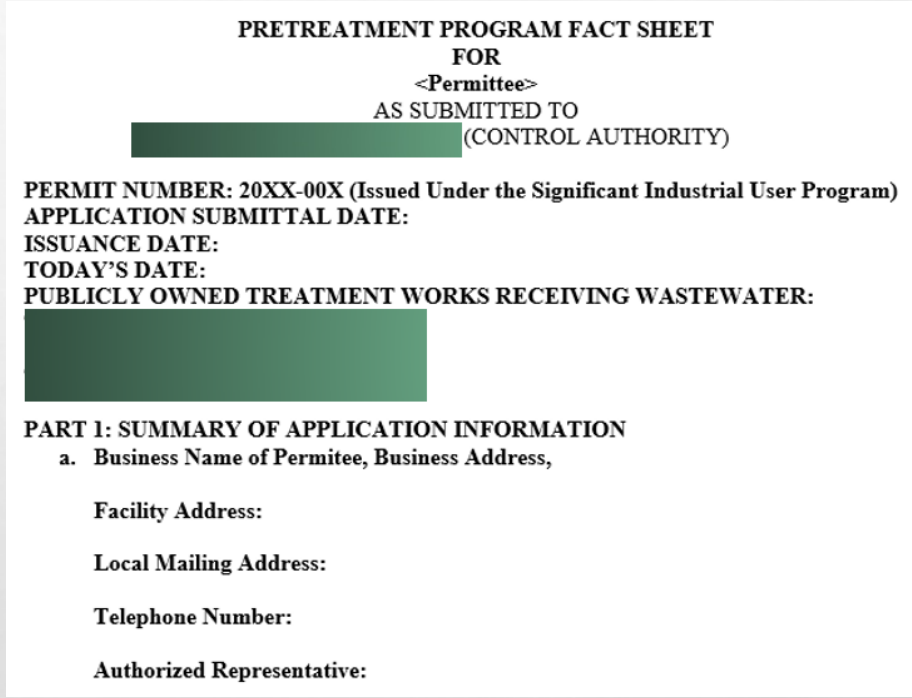
Source: Australian Academy of Science science.org.au/curious/earth-environment/which-came-first-chicken-or-egg

# WHICH PERMITS NEED A FACT SHEET?


- Only categorical and significant industrial users?
- Only permittees with continuous discharge?
- What about temporary permits?
- Every permit issued since the dawn of time?

# A SURVEY OF FORMATS

- **Essay outline**
  - **Pro: A narrative format that lends itself well to descriptive text, such as facility descriptions and rationales.**
  - **Con: Facility addresses, contacts and other routine information take up a lot of inches on the page. A table format for those sections would be more compact.**



PRETREATMENT PROGRAM FACT SHEET
FOR
<Permittee>
AS SUBMITTED TO
[redacted] (CONTROL AUTHORITY)

PERMIT NUMBER: 20XX-00X (Issued Under the Significant Industrial User Program)
APPLICATION SUBMITTAL DATE:
ISSUANCE DATE:
TODAY'S DATE:
PUBLICLY OWNED TREATMENT WORKS RECEIVING WASTEWATER:
[redacted]

PART 1: SUMMARY OF APPLICATION INFORMATION

a. Business Name of Permitee, Business Address,

Facility Address:

Local Mailing Address:

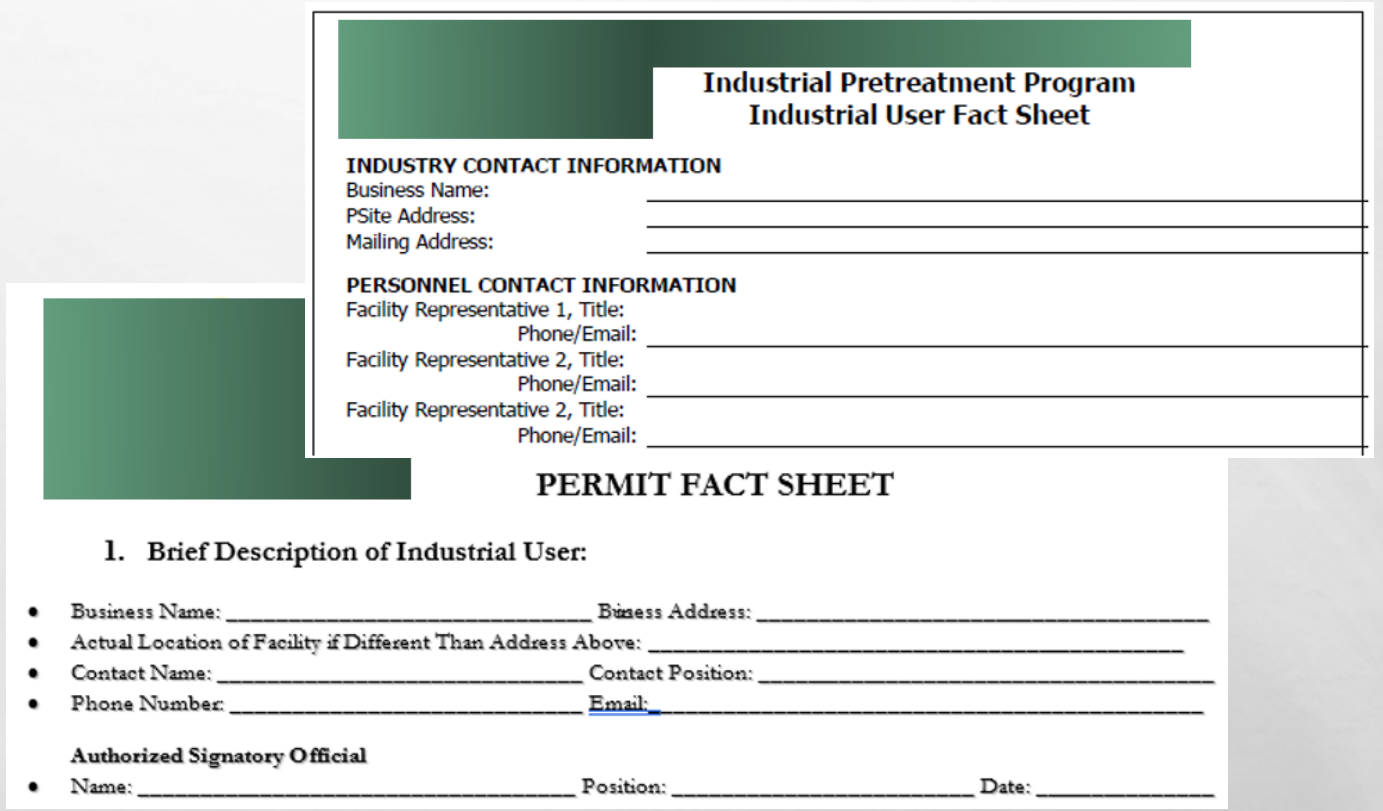
Telephone Number:

Authorized Representative:

**A huge THANK YOU to committee members who sent sample fact sheets for this overview presentation. Pros and cons are the author's opinion and not intended as criticism.**

# A SURVEY OF FORMATS

- **Fill out a form**
  - **Pro: Simple for any staff member to complete.**
  - **Con: Seemed to constrain narrative descriptions. Some sample forms resembled inspection reports and seemed to lack permit limits and detailed rationales.**



Industrial Pretreatment Program
Industrial User Fact Sheet

INDUSTRY CONTACT INFORMATION
Business Name: _____
PSite Address: _____
Mailing Address: _____

PERSONNEL CONTACT INFORMATION
Facility Representative 1, Title:
Phone/Email: _____
Facility Representative 2, Title:
Phone/Email: _____
Facility Representative 2, Title:
Phone/Email: _____

PERMIT FACT SHEET

1. Brief Description of Industrial User:

- Business Name: _____ Business Address: _____
- Actual Location of Facility if Different Than Address Above: _____
- Contact Name: _____ Contact Position: _____
- Phone Number: _____ Email: _____

Authorized Signatory Official
- Name: _____ Position: _____ Date: _____

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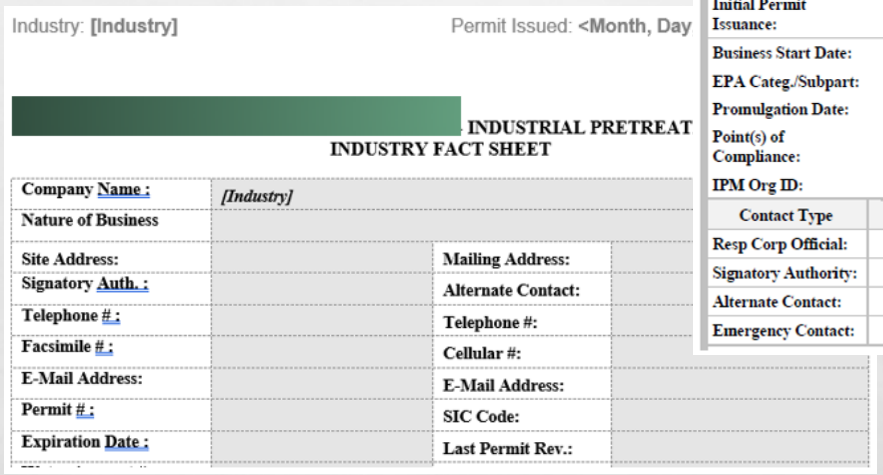
# A SURVEY OF FORMATS

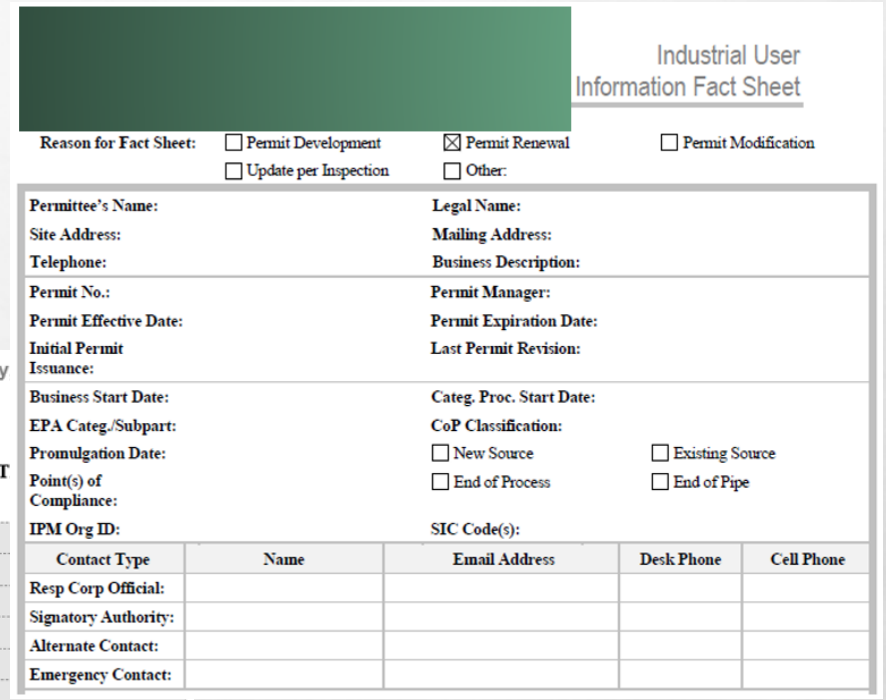
- **Tables**
  - **Pro: Closely resembles the EPA model.**
  - **Pro: Compact format for certain types of information.**
  - **Con: Check box format lends itself to include extraneous info.**
  - **Con: Boxes may constrain narrative details**



Industry: [Industry] Permit Issued: <Month, Day

[redacted] INDUSTRIAL PRETREAT
INDUSTRY FACT SHEET

| | | | |
|---|---|---|---|
| Company Name : | *[Industry]* | | |
| Nature of Business | | | |
| Site Address: | | Mailing Address: | |
| Signatory Auth. : | | Alternate Contact: | |
| Telephone # : | | Telephone #: | |
| Facsimile # : | | Cellular #: | |
| E-Mail Address: | | E-Mail Address: | |
| Permit # : | | SIC Code: | |
| Expiration Date : | | Last Permit Rev.: | |



[redacted] Industrial User Information Fact Sheet

Reason for Fact Sheet: ☐ Permit Development ☒ Permit Renewal ☐ Permit Modification ☐ Update per Inspection ☐ Other:

| | |
|---|---|
| Permittee's Name: | Legal Name: |
| Site Address: | Mailing Address: |
| Telephone: | Business Description: |
| Permit No.: | Permit Manager: |
| Permit Effective Date: | Permit Expiration Date: |
| Initial Permit Issuance: | Last Permit Revision: |
| Business Start Date: | Categ. Proc. Start Date: |
| EPA Categ./Subpart: | CoP Classification: |
| Promulgation Date: | ☐ New Source ☐ Existing Source |
| Point(s) of Compliance: | ☐ End of Process ☐ End of Pipe |
| IPM Org ID: | SIC Code(s): |

| Contact Type | Name | Email Address | Desk Phone | Cell Phone |
|---|---|---|---|---|
| Resp Corp Official: | | | | |
| Signatory Authority: | | | | |
| Alternate Contact: | | | | |
| Emergency Contact: | | | | |

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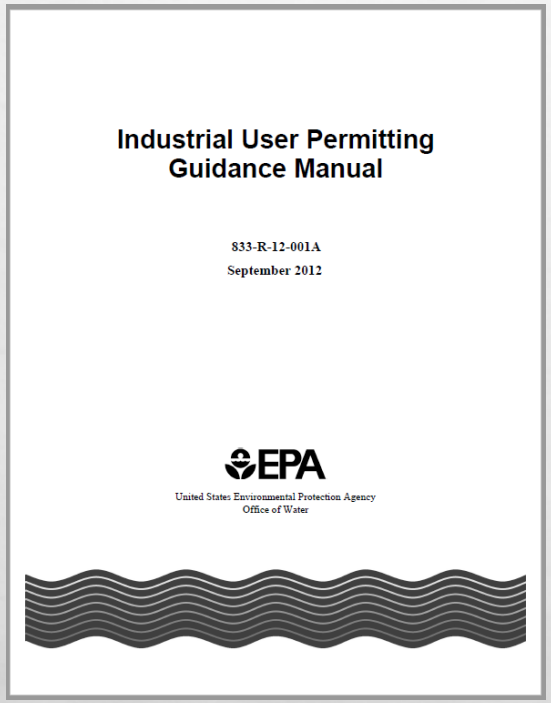
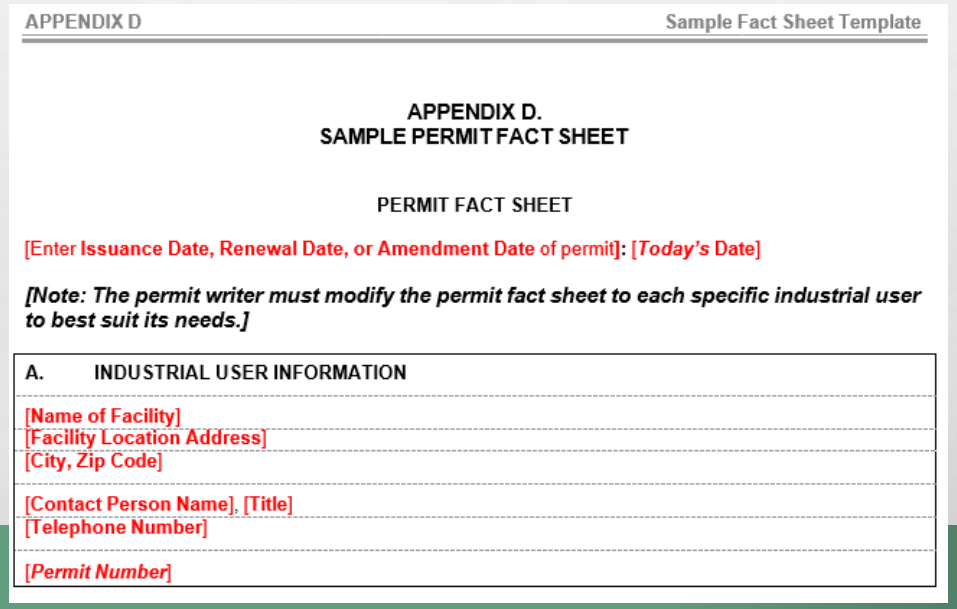
# U.S. EPA MODEL FACT SHEET


Industrial User Permitting
Guidance Manual

833-R-12-001A
September 2012

EPA
United States Environmental Protection Agency
Office of Water

- **APPENDIX D Sample Fact Sheet Template**
- **APPENDIX E Sample Permit Fact Sheet and Industrial User Permit**


APPENDIX D Sample Fact Sheet Template

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*] |

# BRIEF DESCRIPTION OF INDUSTRIAL USER

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] | [*Describe* sample point location along with expected pollutants discharged] |
| | | | | |
| | | | | |
| TOTAL | | [Total flow] | [Total flow] | ---- |

- Name, address, and location of the facility
- Number of connections that the facility has to the sewer system, specifying the one(s) relevant to the fact sheet
- Type of operations in which the facility is engaged (e.g., manufacture of battery terminals)
- Brief description of the plant processes or other sources of generating wastewater
- Categorical determination (if applicable).
- List of raw materials used
- Description of treatment processes (if applicable), including any O&M requirements
- Description of sampling location

# TYPE AND QUANTITY OF THE DISCHARGE

- Rate or frequency of the discharge; the average and maximum daily flow
- Daily maximum and monthly average discharge of any pollutants present in significant quantities or subject to limitations or prohibition

**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]

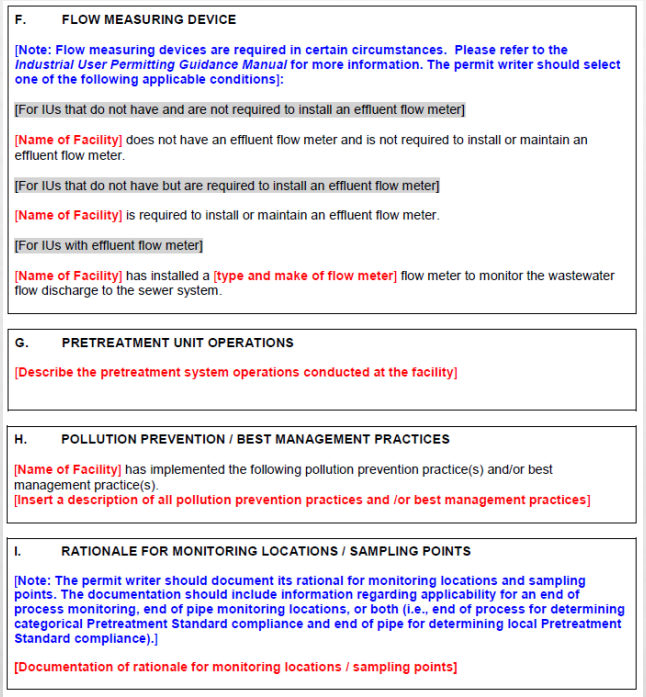
There are no dilution wastestreams that combine with process wastewater.

[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.]

# BASIS FOR THE PERMIT LIMITS



**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**

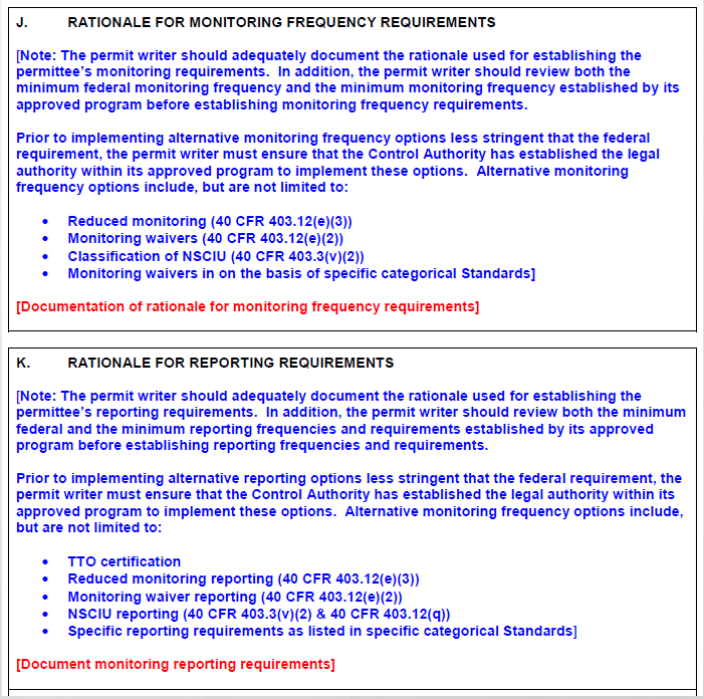
[Note: The permit writer should document its rational for monitoring locations and sampling points. The documentation should include information regarding applicability for an end of process monitoring, end of pipe monitoring locations, or both (i.e., end of process for determining categorical Pretreatment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

[Documentation of rationale for monitoring locations / sampling points]

- Permit application documents
- Analytical data for pollutants provided in both a complete and summary form so that they can be easily reviewed and verified
- Copies of or citations to federal, state, and local regulations
- Copies of literature information where used to develop the permit limits (e.g., pages from the development documents)
- Plant layouts and process and wastewater flow diagrams.

# DETAILED DISCUSSION OF SPECIAL CONDITIONS

- Rationale for any monitoring waivers (e.g., pollutant not present), if applicable
- Rationale for reduced monitoring, if applicable
- Classification of NSCIU, if applicable
- Equivalent limits, if established
- Coverage under a general control mechanism, if applicable



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]

# DETAILED DISCUSSION OF SPECIAL CONDITIONS

**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.]

- Rationale for any monitoring waivers (e.g., pollutant not present), if applicable
- Rationale for reduced monitoring, if applicable
- Classification of NSCIU, if applicable
- Equivalent limits, if established
- Coverage under a general control mechanism, if applicable

# CALCULATIONS

**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:

Step 1: 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.

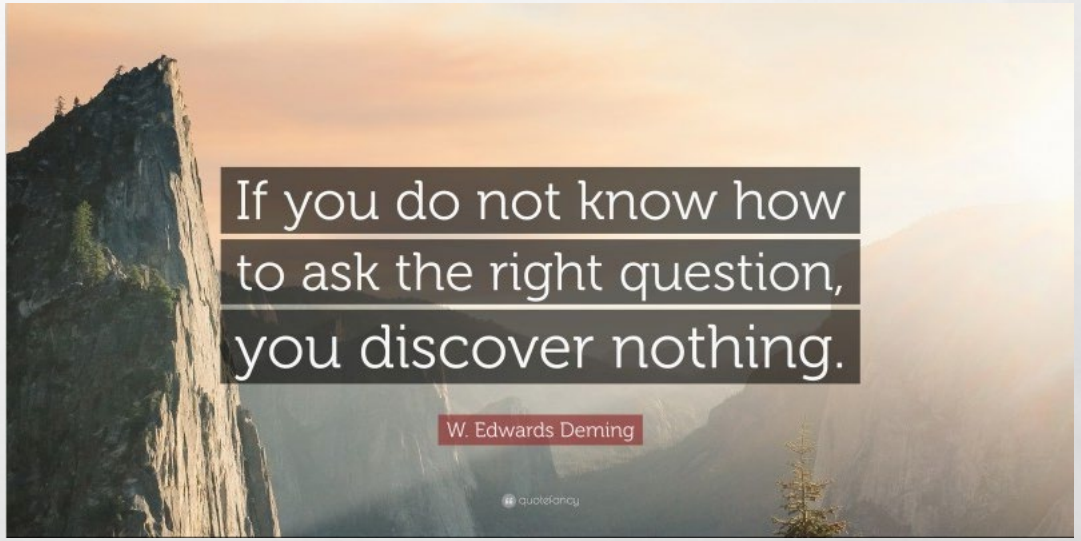
Step 2: Calculation of the Alternative Daily Maximum and Monthly Average Limits:

**[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.]**

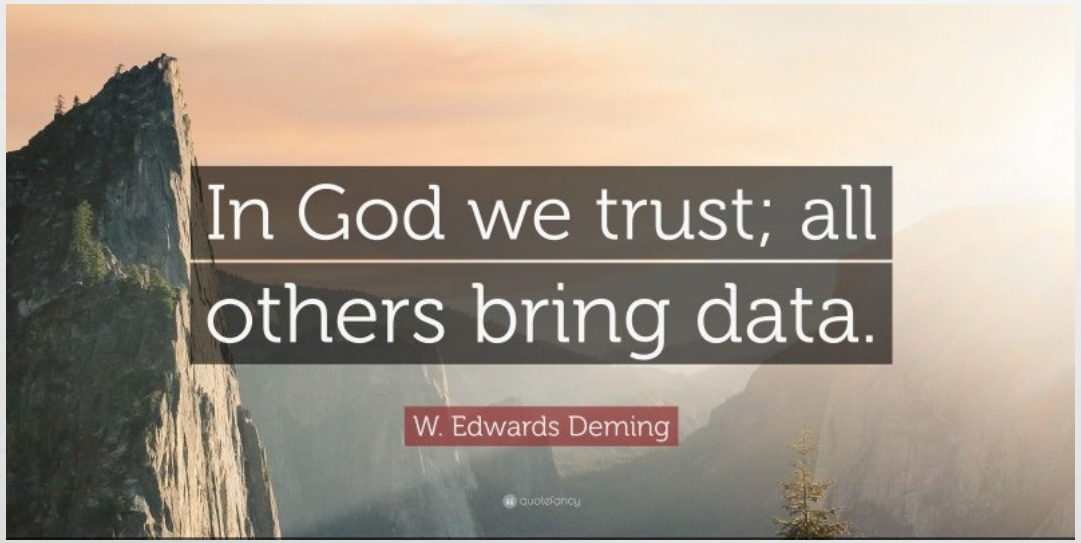
- **Combined wastestream formula or flow-weighted average calculations**
- **Equivalent mass or concentration-based limits calculations**
- **Local limits allocation basis**

# COLLECTING THE FACTS

- Brief description of Industrial User
  - Application
  - Business Cards
    - Call phone numbers to verify they are active
  - Oregon Secretary of State Business Registry
    - Verify legal name
    - Identify all associated corporate entities
  - Verify wastewater utility account numbers
  - Request GIS map of discharge point



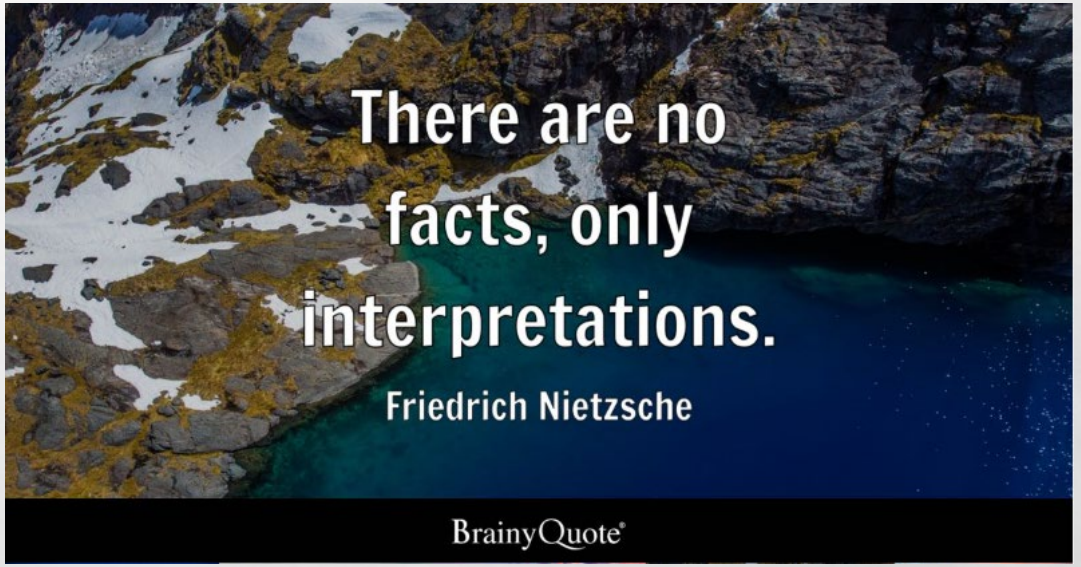
# COLLECTING THE FACTS



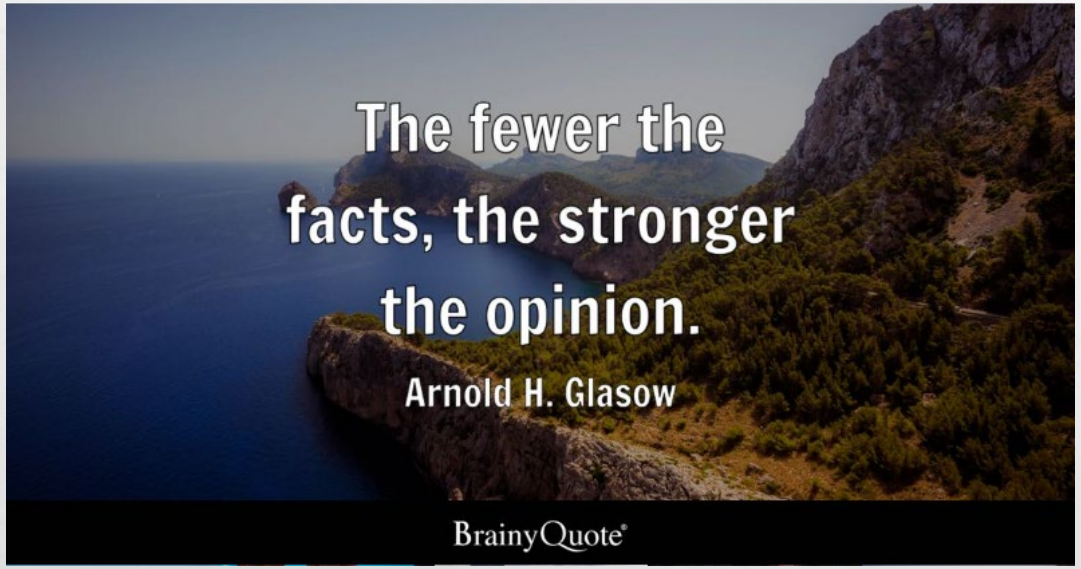

- Type and quantity of the discharge
  - Preliminary findings from application
    - NAICS
    - Applicant process diagram
    - Dilutional flows
  - Records search
    - Water and wastewater  billing
    - Discharge Monitoring Reports (DMR)
  - Final findings are verified by inspection

# INTERPRETING THE FACTS

- Basis for the permit limits
  - Permit application
  - Analytical data for pollutants of concern
  - Categorical IU, Significant IU, Non-Significant
  - Pollutants of concern
  - Rationale



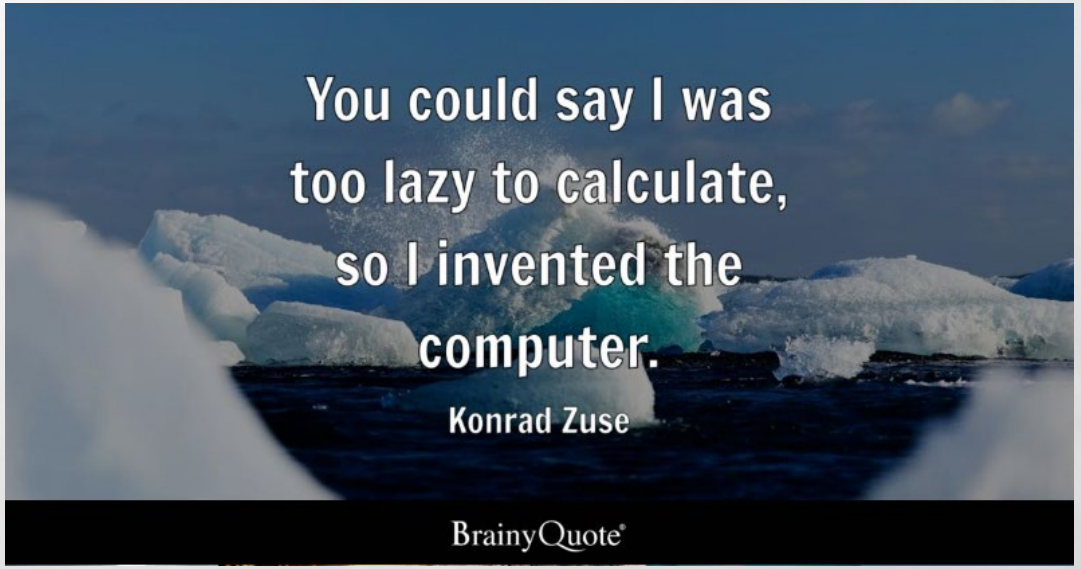
# DETAILED DISCUSSION OF THE FACTS



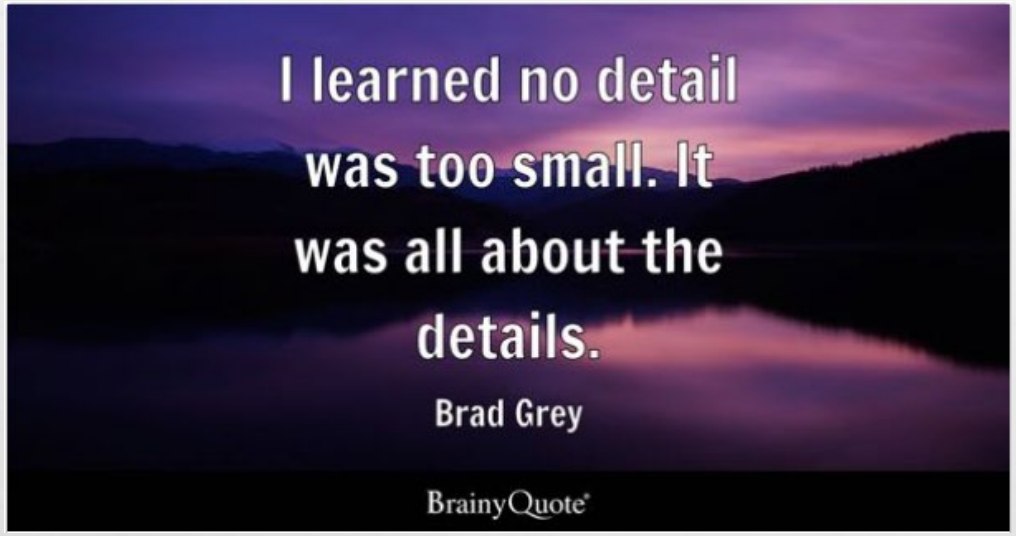

- A rationale for every permit requirement
  - Monitoring waivers
  - Reduced monitoring
  - Limitations
  - Location of sample point
  - Approved sampling method
  - Calibration of flow measurement devices
  - Slug Discharge Control Plan evaluation

# CALCULATIONS

- U.S. EPA has three standard types of calculations that must be included if used.
- Other calculations that may be included:
  - Flow limit
  - Temperature limit
  - Industry specific pollutants
- Cite your sources!



# DELIGHTFUL DETAILS




- List of safety gear required in site
- Actual table of test results used to determine pollutants of concern, rather than a reference
- A point system for discharge risk determination
- Record of change
- Table of resources used to develop the fact sheet
- How annual permit fee was calculated
- Standard format for process drawings in fact sheet
- Identify manhole number at or near discharge point

A huge THANK YOU to committee members who sent sample fact sheets for this overview presentation.
Pros and cons are the author's opinion and not intended as criticism.

# LIST OF SAFETY GEAR REQUIRED IN SITE

| | | | | |
|---|---|---|---|---|
| Safety Gear: | ☐ Steel-toed footwear | ☐ Ear plugs | ☐ Safety glasses | ☐ Other: |
| | ☐ Safety vest | ☐ Hard hat | ☐ Hair net | ☐ Other: |

**PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS**

Safety Glasses: ☐
Hard Hat: ☐
Hearing Protection: ☐
Other: ☐ Description: _____

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# ACTUAL TABLE OF TEST RESULTS

## Table of test results

**Discharge Data Analysis to Identify Pollutants of Concern (POCs):**

Update sample history annually to include the current permit cycle. Append with previous data as needed to reflect compliance issues and system changes.

| Point of Compliance | | Analytical History (Bold POCs) | | | | |
|---|---|---|---|---|---|---|
| POLLUTANT | | # of Samples | Avg. Conc. (mg/L) | Max. Conc. (mg/L) | Pollutant Level of Concern (~10% of limit, mg/L) | Pollutant of Concern? Yes or No |
| Arsenic | METALS | | | | 0.020 | |
| Cadmium | | | | | 0.070 | |
| Chromium | | | | | 0.353 | |
| Copper | | | | | 0.280 | |
| Lead | | | | | 0.070 | |
| Mercury | | | | | 0.001 | |

## Narrative reference

**PART 3: BASIS FOR PERMIT LIMITS**

a. **Permit application documents:**

Permit limits are based on information provided by the applicant during the permit application process, including analysis of monthly compliance reports as well as review of industry compliance during the previous permit term.

b. **Analytical data for pollutants:**

The annual laboratory reports previous to the permit renewal application were analyzed to determine the need for pollutant limits. Annual local limits pollutant testing, biological oxygen demand and total suspended solids were the only laboratory reports required under the previous permit. Daily self-reported pH and chlorine measurements were submitted during the production season. The most stringent limitations relevant to this industry were applied for all pollutants of concern.

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# A POINT SYSTEM

**Discharge Risk Analysis (SIUs only):**

**Discharge Risk Factors & Point System**

| AVERAGE DAILY FLOW (GPD) | |
|---|---|
| Gallons per Day | Points |
| ≤5,000 | 0 |
| 5,000 – 25,000 | 1 |
| 25,001 – 100,000 | 3 |
| 100,001 – 300,000 | 6 |
| >300,000 | 8 |
| SUBTOTAL | |
| | |
| **COMPLIANCE HISTORY** | |
| Number of Sample Days Out of Compliance[1] | |
| 0 | 0 |
| 1 – 2 | 1 |
| 3 – 5 | 3 |
| > 5[2] | 8 |
| SUBTOTAL | |
| | |
| **COMPLEXITY OF PRETREATMENT** | |
| Pretreatment Utilized[3] | |
| BMPs | 1 |
| Solids / Physical | 1 |
| O/G physical | 1 |

| RISK FACTOR CATEGORY | SUBTOTALS |
|---|---|
| AVERAGE DAILY FLOW, Q (GPD) | |
| COMPLIANCE HISTORY | |
| COMPLEXITY OF PRETREATMENT | |
| **TOTAL DRA SCORE** | |

*Highlight Row Below in Bold for "Total DRA Score" Range*

| DRA Range | Monitoring Events per Year | |
|---|---|---|
| | Self | City |
| <4 | 2 | 1 |
| 4-6 | 4 | 1 |
| 7-8 | 6 | 2 |
| 9-14 | 12 | 2 or 4[7] |
| >14 | Work with Program Manager to Determine Frequencies | |

NOTES:

1. Use past 2 years, only pollutant violations
2. Or if in SNC during the previous year
3. Total points for each type of pretreatment used to meet standards at a given compliance point
4. If facility has continuous pH meter report high and low pH's each month

**Discharge Risk Analysis Discussion (SIUs only): - N/A (NSIU)**

| | |
|---|---|
| AVERAGE DAILY FLOW: | |
| COMPLIANCE HISTORY | |
| COMPLEXITY OF PRETREATMENT | |
| NOTES: | |

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# RECORD OF CHANGE

## Log of Fact Sheet Changes

| Date | Description of Changes | Initials |
|---|---|---|
| | | |
| | | |
| | | |
| | | |

## Fact Sheet Amendment(s):

| DATE | AMENDMENT |
|---|---|
| | |
| | |
| | |
| | |

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# TABLE OF RESOURCES VS. REFERENCE

## Table/Checkbox format

**Resources used to prepare the Fact Sheet.** ***Check all that apply***

| | | | |
|---|---|---|---|
| **Previous Permit** | | **Monitoring Data** | |
| **Permit Application** | | **SDS Information** | |
| **NRQ** | | **Fire Marshall Report** | |
| **Compliance History** | | **Site History** | |
| **Site Inspection** | | **Corporate Report** | |
| | | **Similar Operations** | |

## Narrative reference format

An article published by the American Thoracic Society titled *Chlorine Gas Inhalation – Human Clinical Evidence of Toxic and Experience in Animal Models*, July 1, 2010 authored by Carl W. White and James G. Martin was downloaded from the U. S. National Library of Medicine associated with the National Institutes of Health on April 26, 2021 https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3136961/ The section describing low level exposures is quoted below:

> Humans can detect low levels of chlorine gas. In humans, the threshold concentration for detection of the odor of chlorine gas ranges from 0.1–0.3 ppm. At 1–3 ppm, there is mild mucus membrane irritation that can usually be tolerated for about an hour. At 5–15 ppm, there is moderate mucus membrane irritation. At 30 ppm and beyond, there is immediate substernal chest pain, shortness of breath, and cough. At approximately 40–60 ppm, a toxic pneumonitis and/or acute pulmonary edema can develop.
>
> Workplace exposure limits for chlorine include a short-term exposure limit for up to 15-minute exposures not to exceed 1 ppm (2.9 mg/m).

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# HOW PERMIT FEE WAS CALCULATED

7. PERMIT FEE

*Use the Permit Invoicing SOP to determine the industry's point total and which of the three tiers they fall within for the annual permit fee. Document the decision here.*

| PARAMETER | CRITERIA | POINT(S) |
|---|---|---|
| Flow | <10,000 gpd | 1 |
| X-Strength | No | 1 |
| SIU | No | 1 |
| Enforcement | ≤3/year | 1 |
| Self-Monitoring | 1/month | 2 |
| Dist. Monitoring | <1/month | 1 |
| | **TOTAL** | **7** |

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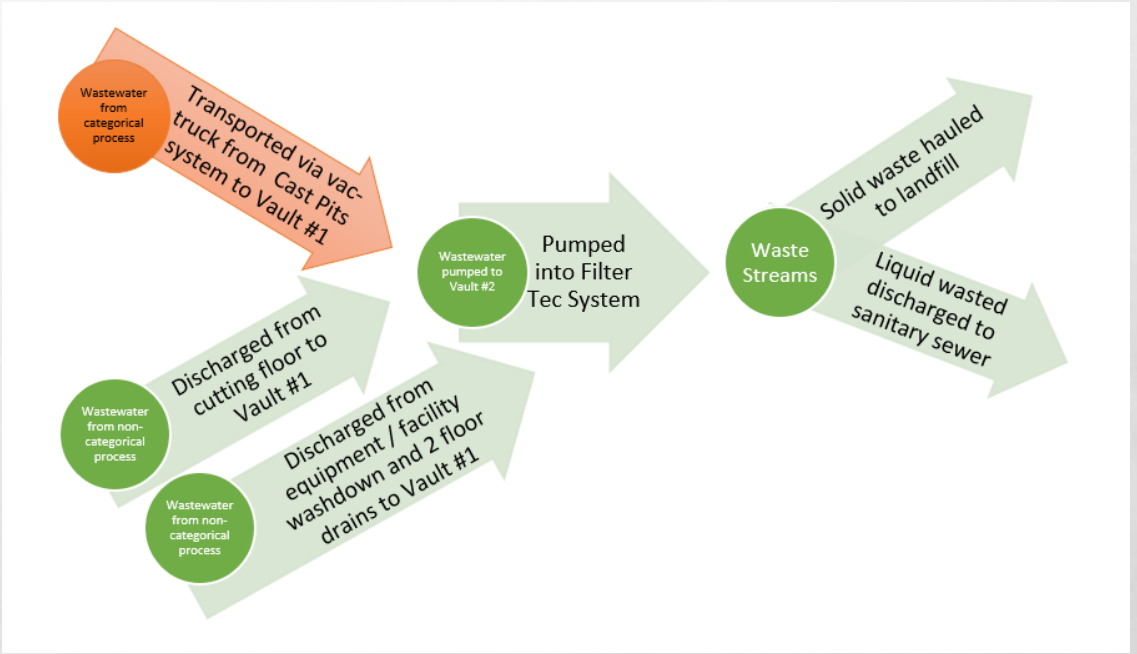
# STANDARD FORMAT FOR DRAWINGS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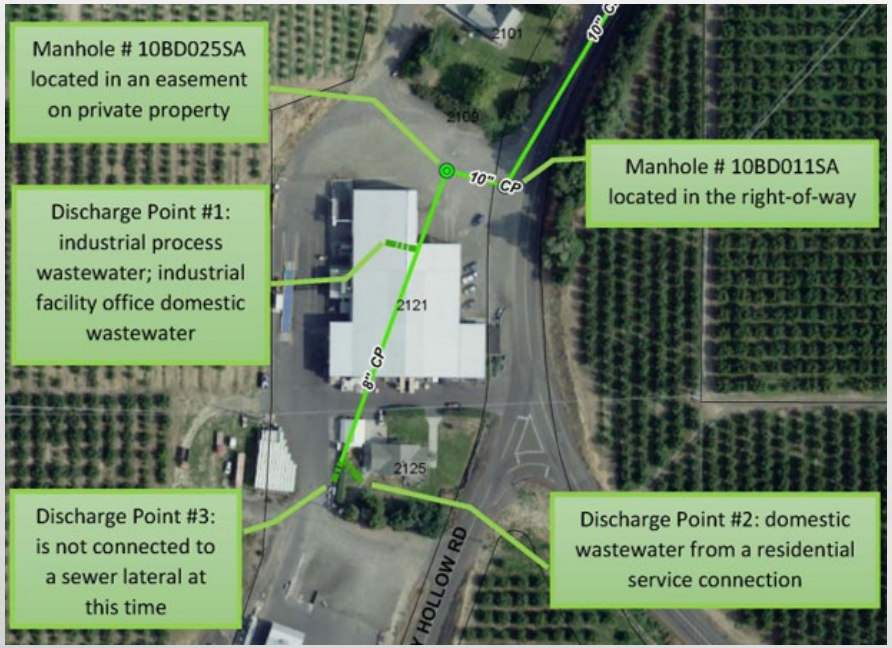
# IDENTIFY MANHOLE NUMBER

## GIS Map




## Narrative

**b. Number and location of connections that the facility has to the sewer system, specify the one(s) relevant to the fact sheet:**
Sewer Connections: The permitted point of discharge is the service connection to the sanitary sewer main on Steelhead Way to the west of the facility, fifty (50) feet west of manhole number 28AC056SA. A second sanitary service connection, located in front of the facility office discharges fourteen (14) feet east of manhole 28BD011SA, that discharges domestic waste only so does not require a permit.

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# FINAL FACT SHEET CONSIDERATIONS


- Who is your audience?
  - Chapter 11. To explain permit conditions and their basis to the Industrial User and to the public
  - Consider using a readability index, 8th - 10th grade reading level
- Technical writing can be aesthetically pleasing? Why bother?

# FINAL FACT SHEET CONSIDERATIONS

- Write the fact sheet as if it were a stand-alone document that will:
  - Remind the permit writer and future staff of the basis of the previous permit
  - Document that permit conditions and modifications were developed in a reasonable, nonarbitrary manner and in accordance with proper procedures
  - Streamline future permitting issuances
  - Explain permit conditions and basis to IU and the public
  - Identify condition changes at permittee's facility or POTW that could result in a permit modification
  - Satisfy possible Approval Authority requirements for documentation of permit rationale

# ANY QUESTIONS?

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City of The Dalles