



CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
INDUSTRIAL WASTE CONTROL DIVISION

303 S. LIVERNOIS AVENUE
DETROIT, MICHIGAN 48209
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WWW.DETROITMI.GOV

CERTIFIED MAIL

December 23, 2009

Ms. Kristen Rachwal
EQ Detroit, Inc.
1923 Frederick Street
Detroit, MI 48211

Re: Modification(s) to Wastewater Discharge Permit No. 923-91964-IU

Dear Ms. Rachwal:

The enclosed Modified Wastewater Discharge Permit No. 923-91964-IU reflects the changes made as a result of your letter dated October 19, 2009 requesting volume increase in the daily wastewater discharges.

In accordance with City of Detroit, Ordinance No. 08-05, or equivalent local ordinance, any appeal regarding this permit must be submitted in writing within twenty (20) days from the date of mailing of this permit.

If you have questions or need clarification, please contact Mr. Andrew E. C. Anyanonu, of the Industrial Waste Control Division, Permits Section, at (313) 297-5851.

Sincerely,

Yousef S. Ahmed
Manager
Industrial Waste Control Division

YSA/AECA/yr
Enclosure



**WASTEWATER DISCHARGE PERMIT
PERMIT NO.: 923-91964-IU**

SECTION A: GENERAL INFORMATION

Facility I.D. No.: 91964
Company Name: EQ Detroit, Inc.
Facility Address: 1923 Frederick Street
Detroit, MI 48211
Mailing Address: 1923 Frederick Street
Detroit, MI 48211

The Detroit Water and Sewerage Department (DWSD) hereby authorizes the Industrial User specified above to discharge industrial wastewater to the City of Detroit sewer system. This authorization is granted in accordance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state laws or regulations.

The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

In addition, this permit is granted in accordance with the application filed with DWSD, and in conformity with plans, specifications, and other substantive data submitted to the Department in support of the above application.

To continue discharging industrial wastewater after the expiration date, it is the responsibility of the Industrial User to submit an application for permit reissuance at least ninety (90) days before the expiration of the existing permit. The permit reapplication form may be requested from this Department.

Effective Date: December 23, 2009

Expiration Date: March 1, 2014

Issued by:

Jose Belen, P.E.
Chemical Engineer
Industrial Waste Control Division

Authorized by:

Yousef S. Ahmed
Manager
Industrial Waste Control Division

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

Categorical Industrial User

Point Source Category: 40 CFR Part 437.46 (b)

Subcategory: Subpart D-Multiple Wastestreams, Pretreatment Standards for Existing Sources (PSES) Subpart - ,

Representative Sampling Location: Controlled MH: 12' S. of south wall of Bio-plant;
187' E. of west fence

Batch Discharge Information: Frequency - Twenty-four (24) batches per day avg.
Duration - One (1) hour per batch
Maximum Volume - 20,000 gallons per batch total from eight (8) tanks

Applicable Discharge Limitations

PARAMETER (reported in mg/l unless otherwise indicated)		Daily Max.	Monthly Avg.	Min. Sampling Frequency**
2,4,6-Trichlorophenol****	TCPH	0.155	0.106	1 / 4 Days
2,4-Dichlorophenol	DCPH	5.5		1 / 4 Days
2,4-Dinitrophenol	DNPH	2.0		1 / 6 Months
2-Chlorophenol	CLPH	2.0		1 / 6 Months
4-Chloro-3-methylphenol	4C3MP	1.0		1 / 6 Months
4-Chlorophenol	4CP	2.0		1 / 6 Months
4-Nitrophenol	4NPH	15.0		1 / 6 Months
Acidity/Alkalinity (pH)	pH	5.0 - 11.5 Units		2 / Months
Antimony	Sb	0.249	0.206	1 / 4 Days
Arsenic	As	0.162	0.104	1 / 4 Days
Biochemical Oxygen Demand	BOD	7500.0		1 / 6 Months
Bis (2-Ethylhexyl) Phthalate****	BEHP	0.267	0.158	1 / 4 Days
Cadmium	Cd	0.474	0.0962	1 / 4 Days
Carbazole****	CARB	0.392	0.233	1 / 4 Days
Chromium	Cr	0.947	0.487	1 / 4 Days
Cobalt	Co	0.192	0.124	1 / 4 Days
Copper	Cu	0.405	0.301	1 / 4 Days
Cyanide (Available)*	AVCN	1.0		2 / Months

Total Phenolic Compounds***	Phenol	1.0		1 / 6 Months
Fats, Oil or Grease	FOG	1500.0		2 / Months
Fluoranthene****	FLAN	0.787	0.393	1 / 4 Days
Iron	Fe	1000.0		2 / Months
Lead	Pb	0.222	0.172	1 / 4 Days
Mercury	Hg	Non-detect*	0.000739	1 / 4 Days
Nickel	Ni	3.95	1.45	1 / 4 Days
Phenol Alcohol	PHEN AL	14.0		1 / 6 Months
Phosphorus	P	250.0		1 / 6 Months
Silver	Ag	0.12	0.0351	1 / 4 Days
Tin	Sn	0.409	0.12	1 / 4 Days
Titanium	Ti	0.0947	0.0618	1 / 4 Days
Total PCB	PCB	Non-detect*		1 / 6 Months
Total Suspended Solids	TSS	7500.0		2 / Months
Vanadium	V	0.218	0.0662	1 / 4 Days
Zinc	Zn	2.87	0.641	1 / 4 Days
n-Decane****	NDEC	5.79	3.31	1 / 4 Days
n-Octadecane****	NOCT	1.22	0.925	1 / 4 Days
o-Cresol****	OCRE	1.92	0.561	1 / 4 Days
p-Cresol****	PCRE	0.698	0.205	1 / 4 Days

* See page 3

*** See Section F(2) for Special Reporting Requirements.

** The Minimum Sampling Frequency of one (1) sample every four (4) operating days, the facility operating days shall be based upon a schedule for:

- Monday – Friday
- Monday – Saturday
- Monday – Sunday

**** All parameters shall be analyzed in accordance with 40 CFR Part 136 methods. All MDL shall be reported with the sample results, and any cleanup procedures and sample interference indicated.

DEFINITIONS and REQUIREMENTS

1. **Total PCB** – means the sum of the individual analytical results for each of the PCB aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260 during any single sampling event with any aroclor result less than the quantification level being treated as zero.

The limitation for Total PCB is Non-detect – Total PCB shall not be discharged at detectable levels, based upon U.S. EPA Method 608, and the quantification level shall not exceed 0.2 µg/l, unless a higher level is appropriate because of demonstrated sample matrix interference. Where one or more samples indicate detectable levels of Total PCB, the user shall be required to demonstrate compliance. For purposes of this section, this demonstration may be made using analytical data showing that the Total PCB concentration is below the detection level, or submission of a BMP in accordance with 56-3-66.1(d).

2. **The Limitation for Mercury (Hg)** – is Non-detect. Mercury (Hg) shall not be discharged at detectable levels, based upon U.S. EPA Method 245.1, and the quantification level shall not exceed 0.2 µg/l, unless a higher level is appropriate because of demonstrated sample matrix interference. Where one or more samples indicate detectable levels of Mercury, the user shall be required to demonstrate compliance. For purposes of this section, this demonstration may be made using analytical data showing that the mercury concentration is below the detection level, or submission of a BMP in accordance with 56-3-66.1(d).
3. **Available Cyanide** – means the quantity of cyanide that consists of cyanide ion (CN⁻); hydrogen cyanide in water (HCNaq); and the cyano-complexes of zinc, copper, cadmium, mercury, nickel, and silver, determined by EPA method OIA-1677, or other method designated as a Standard Method or approved under 40 CFR Part 136.
4. **Total Phenolic Compounds** – means the sum of the individual analytical results for each of the phenolic compounds of 2-chlorophenol, 4-chlorophenol, 4-chloro-3-methylphenol, 2,4-dichlorophenol, 2,4-dinitrophenol, 4-methylphenol, 4-nitrophenol, and phenol during any single sampling event expressed in mg/l.
5. **Quantification Level** – means the measurement of the concentration of a contaminant obtained by using a specified laboratory procedure calculated at a specified concentration above the detection level. It is considered the lowest concentration at which a particular contaminant can be quantitatively measured using a specified laboratory procedure for monitoring of the contaminant.
6. **Best Management Practices (BMP)** – means programs, practices, procedures or other directed efforts, initiated and implemented by a User, which can or does lead to the reduction, conservation or minimization of pollutants being introduced into the ecosystem, including but not limited to the Detroit sewer system. BMPs include, but are not limited to, equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control, and may include technical and economic considerations.

DEFINITIONS and REQUIREMENTS

Discharge Specific Requirements

The Department has classified your facility as a Batch Discharger, based on the information submitted in your permit application or reapplication.

BATCH DISCHARGE

A non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration or frequency of generation warrant periodic releases as the most efficient and effective means of discharge.

The permittee shall maintain a record for all wastewater discharges from the site including but not limited to:

- i) Date of Discharge
- ii) Volume of wastewater discharged

The company shall provide notice to the Department of any material or substantive changes in the frequency or volume of your batch discharge.

DEFINITIONS and REQUIREMENTS

TOTAL TOXIC ORGANICS (TTO) is the summation of all quantifiable values greater than 0.01 mg/l for the listed toxic organics. TTO requirement shall be as follows:

- (a) All parameters shall be analyzed in accordance to 40 CFR Part 136 methods. Usage of approved analytical procedures is essential to the detection of parameters being analyzed. All MDLs should be reported with the sample results, and any cleanup procedures and sample interference shall be reported.
- (b) In lieu of monitoring for TTO, facilities subject to either 40 CFR Part 413 or Part 433 may be allowed to make the TTO certification as a comment to the Six Month Report, provided:
 - i) At least one complete set of analytical results has been submitted for all the TTO pollutants of concern, and
 - ii) The Industrial User has submitted a Toxic Organic Management Plan (TOMP) in compliance with either 40 CFR Part 413 or 433 requirements, and
 - iii) The TOMP has been approved by the Department.

TOTAL METAL is the sum of the concentration of Copper (Cu), Nickel (Ni), Total Chromium (CrT) and Zinc (Zn).

4-DAY AVERAGE is the highest allowable mass or concentration standard of discharges over four (4) consecutive, independent daily sampling events. Compliance with this limitation is calculated as the summation of individual daily discharge, measurements for a parameter taken during four (4) consecutive daily sampling events divided by four (4). The four (4) consecutive sampling events need not occur on consecutive calendar days.

30-DAY AVERAGE is the summation of individual daily measurements for a parameter during a thirty (30) consecutive calendar day period, divided by the number of individual measurements for that parameter taken during that thirty (30) day period. The recommended minimum number of samples (1 set) required to demonstrate compliance are ten (10) independent daily samples.

MONTHLY AVERAGE is the summation of individual daily measurements for a parameter during a calendar month, divided by the number of individual measurements for that parameter taken during that month. The recommended minimum number of samples (1 set) required to demonstrate compliance are 10 independent daily samples.

SECTION C: AUTHORIZED WASTESTREAMS

- 1) As a result of the permit applications and supporting information filed with the Department, the permittee is authorized to release treated wastewater to the Detroit POTW of the following general types as defined in 40 CFR Part 437:
 - (a) Oily waste
 - (b) Organic waste
 - (c) Metal bearing waste

The permittee is specifically prohibited from discharging any wastes containing PCBs (Polychlorinated Biphenyls).

- 2) Upon request of the Department, the permittee shall provide the Department access to waste manifests, or other bills of lading, for all incoming materials within seven (7) days of the request; all analytical information available for each manifest or bill of lading shall be included. Copies shall be provided by the permittee of information selected by the Department.

SECTION D: APPLICABLE LIMITS ON RATE AND TIME OF DISCHARGE & FLOW REGULATION

The permittee is authorized for discharge treated wastewater to the Detroit POTW under the following conditions and restrictions:

Days of Operation: Monday - Sunday

Hours of Operation: Twenty-four (24) hours per day 6:30 a.m. -6:30 a.m.

Daily Rate Limits: The total volume discharged to the Detroit POTW shall not exceed 500,000 gallons per day of treated process wastewater.

The permittee is prohibited from discharging any process wastewater outside of the stated hours or days of operation, including but not limited to discharges on Sunday and Holidays.

Discharge authorization may be granted for releases during Holiday periods where the permittee provides at least 72 hours notification to the Department and receives prior written authorization from the DWSD for the proposed Holiday discharge.

SECTION E: SELF-MONITORING CONDITIONS AND REQUIREMENTS

- 1) The sampling location(s) used for purposes of compliance sampling and reporting is identified in Section B. No alternate locations will be accepted unless approved by the Department. Except in emergencies, all requests for an alternate sample location or change in the sampling location shall be submitted in writing at least thirty (30) days prior to the proposed date of change.
- 2) The minimum sampling frequency per pollutant for purposes of compliance sampling and reporting is identified in Section B. The Department recommends and supports sampling efforts greater than the stated minimums.

The sampling frequency has been calculated by the Department for your facility based upon the information submitted in your application (or re-application), or from prior reports or inspections, including:

- (a) Evaluation of compliance history (effluent and non-effluent)
 - (b) Volume of process wastewater discharged to the sewer
 - (c) Reported discharge frequency (if other than daily)
- 3) The specific pollutant parameters, which are to be monitored for purposes of compliance sampling and reporting, are identified in Section B.
 - (a) A single daily flow proportional composite sample shall be collected and analyzed for all parameters specified in Section B, except for Fats, Oil or Grease (FOG), Cyanide (total, available, or amenable), pH, Total Phenols, and the volatile organic compounds included in the TTO list, which shall be collected by one or more grab samples. The sample shall be representative of the facility's discharge.
 - (b) All daily samples shall be individually analyzed, reported and compared against the applicable daily maximum limitations listed in Section B. Any required average, if applicable, shall be calculated from the individual results, and compared against the applicable average limitations listed in Section B.
- 4) All sampling and analyses reports for purposes of compliance sampling and reporting, as identified in Section B, must be performed in accordance with the methods and techniques specified in 40 CFR Part 136 and any amendments thereto.
- 5) The usage of approved analytical procedures, as defined in 40 CFR Part 136 is essential to the detection of the parameters being analyzed. Samples analyzed by other methods, e.g. SW-846, are specifically prohibited.

SECTION F: REPORTING AND NOTIFICATION REQUIREMENTS

- 1) If sampling performed by the permittee indicates a violation of the stated permit limitations, then the permittee shall make a demonstration of compliance, which is acceptable to the Department. This demonstration shall consist of the following minimum requirements:
 - (a) Notification to the Department's Inspection Section at telephone number (313) 297-5826 or fax number (313) 297-5860 within twenty-four (24) hours of becoming aware of the violation.

NOTE: For purposes of this section, when interpreting, "***within twenty-four hours of becoming aware***" the Department shall consider the reasonable time frame which the authorized representative, or their designated authorized representative, actually or should have become aware of the exceedance or violation through due diligence.
 - (b) Report the suspected or known causes of violation and any corrective measures taken or planned to prevent future noncompliance.
 - (c) A demonstration of compliance by collecting and analyzing at least two (2) more individual daily samples.
 - (d) Submission of the report to the Department within thirty (30) days of becoming aware of the noncompliance.
- 2) The facility elected to comply with the specific limitations for each of the eight (8) individual phenolic components in Section B, in lieu of the total phenols limitation.

SECTION G: OTHER REQUIREMENTS

- 1) The permittee is prohibited from disposing of or discharging any waste or wastewater not identified in the permit application, to the POTW.
- 2) The permittee is required to comply with all conditions, standards, and requirements of this permit. Failure to comply will result in enforcement action.
- 3) Slug Control/Spill Prevention Plan

The permittee is required initially to submit a Slug Control/Spill Prevention Plan (SC/SPP), in accordance with the City of Detroit Ordinance 08-05, to provide protection against accidental discharges to the POTW, unless the permittee has a written notification from the Department exempting them from this requirement.

In addition, the permittee shall review and, if necessary, modify or update its SC/SPP and notify the Department:

- i) every two (2) years and/or
 - ii) any substantial change in operation
- 4) Six Month Report

The Six Month Report must be submitted to the Department semiannually on or before June 30 and December 31 of each year. The report must be submitted in the form prescribed by the Department or on an alternative form approved by the Department. It must contain the following requirements:

- i) the analytical part (Self-Monitoring Requirements/Wastewater Analyses), and
- ii) the descriptive part (i.e. facility information, water usage/discharge information, certified statement, certification, etc.)

Self-Monitoring report for PCB, Phenolic Compounds and TTO should be reported based on the following understanding:

- i) if the company chooses to submit the results in the December Six Month Report, the June report should indicate the company's preference, or
- ii) if the company submits the results in the June report, the December report should state that the results have already been submitted in the June report.

This report shall be signed and dated by the authorized representative of the Industrial User.

SECTION G: OTHER REQUIREMENTS (Cont'd)

5) Sewerage Flow Meter

- i) The facility must conduct an annual maintenance evaluation of its sewerage flow meter. The facility shall provide the Department with its certification attesting the workability/accuracy of the meter and last calibration date during Comprehensive Inspection (CI) or with its Six Month Report (SMR). No discharge shall bypass the flow meter
- ii) If the facility's sewerage flow meter malfunctions, the company must notify the Department's revenue group at (313) 297-5862 within forty-eight (48) hours of problems.
- iii) If the facility plans to replace or install a new sewerage flow meter, the revenue group must also be notified prior to replacement or installation of sewerage flow meter.

6) CWT Subpart D (40 CFR Part 437.41) Requirements

Centralized Waste Treatment Facilities subjected to 40 CFR Part 437 Subpart D shall submit periodic certification of providing equivalent treatment to the wastes received and discharged by the facility. This certification must be submitted every year with the December 31, Six Month Report. The facility is required to provide adequate treatment as certified to all the wastes discharged into the Detroit Sewer System. The facility shall also maintain the on-site compliance paper work as required by 40 CFR Part 437.41.

GENERAL TERMS AND CONDITIONS

The Industrial User (IU) is authorized to discharge industrial wastewater to the City of Detroit sewer system in compliance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

- 1) **Records for monitoring activities** shall be maintained in accordance with ordinance requirements and shall include the following information for all samples:
 - a) The date, time, exact place and method of sampling
 - b) The names of persons taking the sample
 - c) The technique or method of analysis, the date and results of analysis
 - d) The names of person performing the analysis

- 2) **Notification and Reporting Requirements**

CONTROL CENTERS

Systems Control Center	(313) 267-6000	(24-hours)
Wastewater Treatment Plant	(313) 297-9000	
Industrial Waste Control Office	(313) 297-5826	
Industrial Waste Control Fax No.	(313) 297-5860	

Notification

A. Sampling Violations - Self Monitoring

Within 24 hours of becoming aware of a violation, the IU shall notify DWSD by telephone at (313) 297-5826 or by fax at (313) 297-5860.

B. Slug Loading / Accidental Discharge

Within one (1) hour of becoming aware of a discharge entering into the sewer system which exceeds or does not conform with federal, state or City of Detroit laws, regulations or the permit requirements, the Industrial User (IU) shall telephone Detroit Water and Sewerage Department (DWSD) at the Systems Control Center and inform the Department about the details of the discharge.

C. Upset at the IU's Pretreatment Facility

Within twenty-four (24) hours of becoming aware of an upset, the IU shall telephone DWSD at the System Control Center and inform the Department about the details of the upset and discharge.

D. Unanticipated Bypass of IU's Pretreatment Facility

Within twenty-four (24) hours of becoming aware of the bypass, IU shall telephone DWSD at the System Control Center and inform the Department about the details of the discharge.

Submission of Report

For the incidents B, C, and D, a written report shall be submitted to the Department within five (5) calendar days of becoming aware of the incident. This report shall contain the following information:

- i) A description of the discharge and the cause of the incident;
- ii) The duration of the incident including exact dates and times or, if not corrected, the anticipated time the incident is expected to continue;
- iii) Steps being taken and/or planned to reduce, eliminate and prevent future occurrences of a similar incident.

Anticipated Bypass

If an IU anticipates the need for a bypass, prior notice shall be submitted to the Department at least ten (10) days, if possible, before the date of bypass. The report shall be accompanied by analytical data, if available, which shows the characteristics of the material to be bypassed. Upon evaluation, the Department will provide the IU with its determination on the bypass.

The IU may also have certain notification requirements under applicable federal regulations, including but not limited to 40 CFR Part 403.

3) Limitations on Permit Transfer

The wastewater discharge permit shall not be reassigned or transferred without the written approval of the City of Detroit Water and Sewerage Department and provision of a copy to the new owner or operator. The permittee shall notify the Department of any such changes at least thirty (30) days prior to the change.

4) Modifications or Revisions of the Permit

The permittee should notify the Department of any facility or operational changes which may affect the permit.

The terms and conditions of the permit may be subject to modification by the City of Detroit Water and Sewerage Department during the terms of the permit, in accordance with applicable law, including but not limited to the City's ordinance.

5) Confidential Information

Except for data accepted by the City as confidential under the City ordinance, all information and data on the permittee obtained from written reports, questionnaires, permit applications, permits, monitoring programs and inspections shall be available to the public or other government agencies without restriction.

6) **Legal Actions**

- a) Any user who violates any local provision, including the failure to pay any fees, charges, or surcharges imposed hereby, or any condition or limitation of a permit issued pursuant thereto or who knowingly makes any false statements, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to this ordinance or wastewater discharge permit or who tampers with, or knowingly renders inaccurate any monitoring device required under this ordinance is guilty of a misdemeanor and shall, upon conviction, be punished by a fine not to exceed \$500 for each violation per day or by imprisonment for not more than ninety (90) days or by both.

The Department is hereby authorized to seek, through its counsel, prosecution of criminal charges against any person violating any provision of this ordinance.

- b) If any person discharges sewage, industrial wastes, or other wastes into the POTW contrary to the provisions of the ordinance, permit or order issued thereunder, the Director or Board may commence a civil action to enjoin such discharge or to enforce compliance with this ordinance, permit or order issued thereunder, in the Circuit Court for the County of Wayne or other appropriate court. Upon a proper showing of a violation of this ordinance, permit or order issued thereunder, a permanent or temporary injunction may be granted without bond. The Department or Board may also seek additional legal and/or equitable relief.

Instituting suit in the Circuit Court does not constitute as exclusive election of remedies and does not prohibit the Department, Director, Board, or City of Detroit from commencing action in Federal Court for discharges believed to be in violation of this ordinance, State and Federal requirements pursuant to the Clean Water Act, the City's NPDES permit, or other applicable laws or requirements.

The City of Detroit may also recover reasonable attorney fees, court costs, court reporters fees, and other unusual expenses related to enforcement activities or litigation against the person found to have violated this ordinance or the orders, rules, regulations, and permits issued hereunder.

- c) All fines, costs and penalties which are imposed by any court of competent jurisdiction shall be payable to the clerk of such court, who shall deposit the same with the City Treasurer, all of which fines, costs, and penalties shall be credited to the appropriate fund of the Water and Sewerage Department.

- 7) **All reports shall be addressed to:** Detroit Water and Sewerage Department
Industrial Waste Control Division
303 S. Livernois
Detroit, Michigan 48209

8) **Requirement to Reapply**

This permit shall expire on the expiration date identified. Existing permittees shall apply for permit reissuance a minimum of ninety (90) days prior to the expiration of existing permits on a form prescribed by the Department. Upon timely application for reissuance of a permit, the expired permit shall be automatically extended until modified or reissued by the Department. Failure to submit a timely reapplication for reissuance may result in a delayed issuance of a permit and a cessation of unpermitted discharges to the sewer system.

9) **Records Retention**

The permittee shall maintain records of all information from monitoring activities, permit requirements, or 40 CFR Part 403.12 for no less than three (3) years.

10) **Operation and Maintenance of Pretreatment Facilities**

The permittee shall operate and maintain any and all pretreatment facilities in a prudent and professional manner. Records of operation and maintenance shall be provided to the Department for review, upon request.

11) **Right of Entry**

The Department's employees or authorized representative shall have ready access to the industrial user's premises to engage in inspection, sampling, compliance monitoring and/or metering activities. Each such activity shall be commenced and completed at reasonable times, and in a reasonable manner. It is the permittees' responsibility to make prompt and necessary arrangements so that upon presentation of appropriate credentials, personnel from the Department will be permitted to enter immediately for the purposes of performing their specific responsibilities.

Denial of access to any authorized Department representative shall result in enforcement action.

12) **Permit Revocation**

The Department may revoke this permit at any time in accordance with applicable law. Actions for which a permit may be revoked include, but are not limited to, failure of a facility to comply with the permit, failure to comply with an administrative order, or court order, discharging wastewater which has the potential to or does threaten the POTW or the community, discharges which would cause the POTW to violate its NPDES permit.

Where such action is taken by the Department, the former permittee shall have an opportunity for a hearing for permit reinstatement in accordance with applicable law.

Guidelines for Waste Receipt Classification

If the CWT facility receives the wastes listed in the waste classification table, the subcategory determination may be made solely from this information. For purposes of this rule, the CWT facility need not determine the percentage of each type of waste within a subcategory or between subcategories. The CWT facility only needs to determine what subcategory the wastes fall into: one or multiple subcategories.

Table – Waste Receipt Classification

<p>Metals Subcategory</p>	<ul style="list-style-type: none"> -spent electroplating baths and/or sludges -metal finishing rinse water and sludges -chromate wastes -air pollution control blow down water and sludges -spent anodizing solutions -incineration wastewaters -waste liquid mercury -cyanide-containing wastes -waste acids and bases with or without metals -cleaning, rinsing, and surface preparation solutions from electroplating or phosphating operations -vibratory deburring wastewater -alkaline and acid solutions used to clean metal parts or equipment
<p>Oils Subcategory</p>	<ul style="list-style-type: none"> -used oils -oil-water emulsions or mixtures -lubricants -coolants -contaminated groundwater clean-up from petroleum sources -used petroleum products -oil spill clean-up -bilge water -rinse/wash waters from petroleum sources -interceptor wastes -off-specification fuels -underground storage remediation waste -tank clean-out from petroleum or oily sources -non-contact used glycols -aqueous and oil mixtures from parts cleaning operations -wastewater from oil bearing paint washes
<p>Organics Subcategory</p>	<ul style="list-style-type: none"> -landfill leachate -contaminated groundwater clean-up from non-petroleum sources -solvent-bearing wastes -off-specification organic product -still bottoms -byproduct waste glycol -wastewater from paint washes -wastewater from adhesives and/or epoxies formulation -wastewater from organic chemical product operations -tank clean-out from organic, non-petroleum sources

Waste Characterization Using Numerical Criteria

For wastestreams that are from non-specific sources or not listed in the waste receipt classification table, the facility should additionally complete the following steps. The facility should use data collected during the waste acceptance procedures to classify the waste into the appropriate subcategory. EPA recommends the CWT facility apply the following hierarchy:

1. If the waste receipt contains oil and grease at or in excess of 100 mg/L, the waste receipt should be classified in the oils subcategory;
2. If the waste receipt contains oil and grease <100 mg/L, and has any of the pollutants listed below in concentrations in excess of the values listed below, the waste receipt should be classified in the metals subcategory.

Cadmium	0.2 mg/L
Chromium	8.9 mg/L
Copper	4.9 mg/L
Nickel	37.5 mg/L

3. If the waste receipt contains oil and grease <100 mg/L and does not have concentrations of cadmium, chromium, copper, or nickel above any of the values listed above, the waste receipt should be classified in the organics subcategory.

PERMIT DEFINITION

1. FACILITY DESCRIPTION

EQ Detroit, Inc. is a Centralized Waste Treatment Facility which accepts hazardous and non-hazardous materials from various industrial and commercial sources. The facility is identified and characterized by three subcategories, metals subcategory, oils subcategory and organics subcategory. These categories clearly identify the sources of the facility's accepted waste materials. The facility, has seventy (70) employees, operates 24 hours per day, three (3) shifts per day, seven (7) days a week.

2. PROCESS DESCRIPTION

The wastes are separated on the basis of their characteristics and/or sources. The wastes are subsequently pretreated by one or more of the following processes: Metals precipitation, neutralization, chemical oxidation/reduction, carbon adsorption, sand filtration, oil-water separation, cyanide destruction and emulsion breaking. The sludge generated from the processes is hauled off-site by licensed haulers, and the process wastewater is discharged to the sewer.

3. APPLICABLE CLASSIFICATION

The facility is classified as a Categorical Significant Industrial User (SIU) under 40 CFR Part 437.46(b), Subpart D-combined waste receipts from Subparts A, B and C (PSES). The indicated Subparts are metals treatment, oils treatment and organic treatment subcategories. In addition, the facility discharges more than 25,000 gpd of treated process wastewater.

4. WASTEWATER DISCHARGE FLOW INFORMATION

Process Wastewater:	500,000 gpd (maximum)
Sanitary:	<u>1,400 gpd (average)</u>
Total Plant Flow	501,400 gpd (maximum)

BATCH DISCHARGE INFORMATION

Frequency:	Twenty-four (24) batches per day avg. (from all eight (8) tanks)
Duration:	One (1) hour per batch (avg.)
Maximum Volume:	20,000 gallons per batch total from eight (8) tanks


5. SOURCES OF INFORMATION

- i) Permit Re-Application dated June 1, 2009
- ii) Comprehensive Inspection dated May 28, 2008

Prepared by:



Reviewed by:



Date:

12/22/09

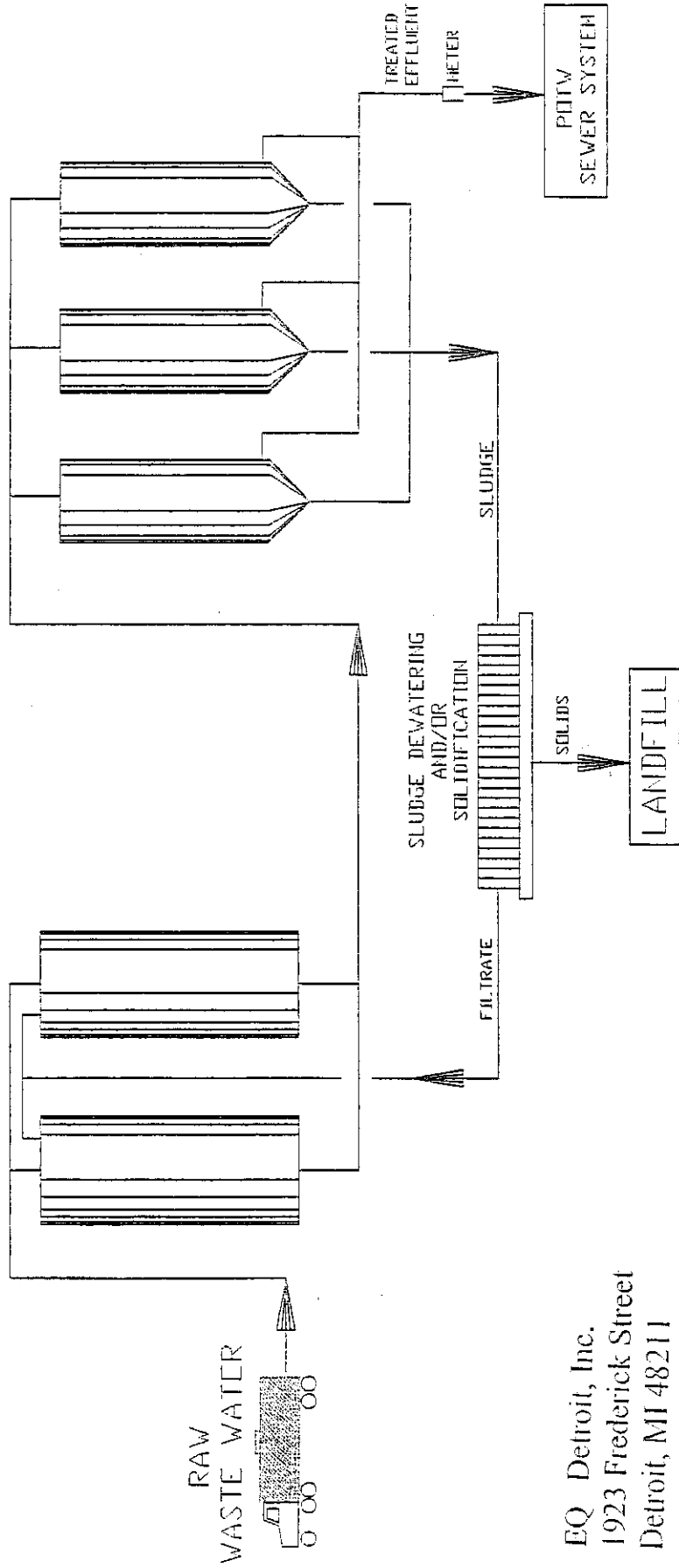
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LIQUIDS WASTE WATER FLOW DIAGRAM

TREATMENT PROCESSES
 METALS PRECIPITATION
 CHEMICAL OXIDATION
 CHEMICAL REDUCTION
 OIL/WATER SEPARATION
 CYANIDE DESTRUCTION
 CHROMIUM REDUCTION

INFLUENT TANKS



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