

**City of Great Falls**  
**Industrial Pretreatment Program**  
**Industrial Wastewater Discharge Permit Rationale**  
**National Laundry Company**  
Permit No. 05-24  
April 2024

Completed by Michael Baker International & Trudy Koelstra

## **AUTHORITY & PURPOSE:**

The City of Great Falls' (City) Montana Pollutant Discharge Elimination System (MPDES) permit requires the City to establish and operate an Industrial Pretreatment Program (IPP) to regulate indirect dischargers to the Publicly Owned Treatment Works (POTW). The City's IPP was approved under the Federal Clean Water Act (CWA) by the United States Environmental Protection Agency (EPA) on December 23, 1985, establishing the City as the Control Authority. Title 13 Chapter 12 of the Official Code of the City of Great Falls (OCCGF) establishes policy, procedures, and requirements applicable to indirect dischargers to the City's POTW in order to protect City infrastructure and ensure compliance with federal and state requirements under the Federal Clean Water Act, the Montana Water Quality Act, the City's MPDES discharge permit, and the general federal pretreatment regulation under Title 40 Code of Federal Regulations (CFR), Part 403. The Industrial Wastewater Discharge Permit does not authorize direct discharge to state waters.

Section (§) 13.12.050.G (OCCGF) establishes that the City will issue Industrial Wastewater Discharge Permits to Industrial Users for a period not to exceed 5 years. Section 13.12.050 OCCGF further defines that an existing discharger proposing to continue to discharge after expiration of its permit must provide a renewal permit application for City consideration and action. Finally, Section 13.12.050.J OCCGF provides that the City may modify an Industrial Wastewater Discharge Permit for good cause. Cause includes updating permits to address significant alterations to the industrial user's operation, process, or wastewater volume or character. This Permit Rationale provides the City's statement of fact and conclusions of law for its decision to issue the **National Laundry Company (NLC)** Industrial Wastewater Discharge Permit.

## **BACKGROUND:**

### **Permit History and Application Information**

**NLC** was originally permitted to discharge to the City's POTW in 2004. In the most recent permit, Permit #11-03 became effective on November 7, 2013 with an expiration date of midnight on November 6, 2018. In September 2014, the City proposed to modify **NLC's** permit to comply with the requirements of the Consent Decree negotiated with U.S. EPA. On October 3, 2014, the City's Environmental Division (COGF ENV) posted a Public Notice of proposed changes for **NLC's** Industrial Waste Discharge Permit. No comments were received, and a modified permit was approved on December 15, 2014.

**NLC** submitted an application for permit renewal on March 16, 2018. COGF ENV requested more information on April 16, 2018, which was received on April 19, 2018. Pursuant to §13.12.050.G.3 OCCGF, **NLC** filed a timely and complete application. On May 18, 2018, COGF ENV declared the Industrial Waste Discharge Permit Renewal application complete, pursuant to §13.12.050.G.3 OCCGF and administratively extended the permit until official renewal could occur. The City was expecting to receive a draft MPDES permit in 2018, and the COGF ENV planned to complete a detailed re-evaluation of local limits before renewing **NLC's** Industrial Wastewater Discharge Permit.

The City was issued a draft MPDES permit on October 22, 2018, but the final MPDES permit was not issued until July 18, 2019. Following final MPDES permit issuance, the City appealed, and the Montana Board of Environmental Review voted to adopt the order accepting the final settlement and MPDES Permit on August 13, 2021. The U.S. EPA determined the local limits were approvable subject to public notice on July 10, 2023. Following public notice and two public readings (August 15, 2023 and February 6, 2024), the local limits ordinance was codified on March 7, 2024.

As part of the 2023 Annual Inspection on December 14, 2023, NLC signed a certification statement that no significant changes had occurred since the permit renewal application was deemed complete and administratively extended on May 18, 2018.

### **Facility Description**

NLC offers commercial dry cleaning services to the community of Great Falls, MT. NLC's facility is located at 700 Crescent Circle, Great Falls Montana, located in the NE ¼ of SW ¼ of Section 11, Township 20 North, Range 3 East Prime Meridian, Cascade County Montana.

The discharge of both domestic and process wastewater will be into NLC's private line leading to a private lift station. From the private lift station, wastewater is pumped through an 8-inch force main to City manhole #2173 on line #2272 located within Huffman Avenue. The collection system and lift station have capacity for NLC's current discharge at this location. COGF ENV finds, pursuant to §13.12.050.G.3 OCCGF, that the operation and discharge of the applicant would permit the normal and efficient operation of the POTW.

The SIC Code is 3582 – Commercial Laundry, Dry Cleaning, Pressing Machines. This corresponds to the North American Industry Classification System (NAICS) number 812320 – Dry Cleaning and Laundry Services. The NAICS code for 812320 is explained below.

This industry comprises establishments primarily engaged in one or more of the following: (1) providing dry cleaning services (except coin-operated); (2) providing laundering services (except linen and uniform supply or coin-operated); (3) providing drop-off and pick-up sites for laundries and/or dry cleaners; and (4) providing specialty cleaning services for specific types of garments and other textile items (except carpets and upholstery), such as fur, leather, or suede garments; wedding gowns; hats; draperies; and pillows. These establishments may provide all, a combination of, or none of the cleaning services on the premises.

NLC currently process approximately 25,000 pounds of laundry per day. NLC operates one shift per day, five days per week (Monday through Friday).

### **Process Description**

A current (2016) process flow diagram is on file with the City.

Laundry is delivered by the delivery truck and offloaded in the dock area. These loads are separated into soiled fabrics, rugs, linens, mops, sheets, towels, and medical linens. Each load is then also sorted according to soil classifications. Different loads are cleaned in accordance with their classifications. Once soils are removed, lint is collected from the washing and drying activities. The lint is filtered via a bar screen, collected, and disposed of in the solid trash.

NLC has a re-use system that diverts final rinse wastewater to their re-use tank. This re-use water is filtered and placed in a second tank for use in washing the most soiled floor mats. From there, the wastestream is used in a non-contact process, where the hot wastewater pre-heats the fresh water entering

the hot water heater; thereby, also cooling the wastewater which is about to be discharged to the City's sanitary sewer system.

- **Chemical Storage.** Chemicals are stored in a chemical containment pit within the facility. Chemical use within the process is controlled by a computer-controlled distribution system and calibrated monthly. There are no drains located in the chemical containment pit.
- **Floor Drains.** No floor drains are located in the laundry process area or in the chemical storage areas.
- **Non-process wastewater.** Facility restrooms discharge to the City sewer through the same connection as the industrial wastewater.
- **Other Waste:** Approximately 20 to 30 pounds of lint are collected from washing and drying activities daily.
- **Stormwater.** Stormwater is not exposed to process wastewater within the facility. There are no known roof drain connections to the City's stormwater system.

#### **Outfalls and Monitoring Point(s)**

- **Outfall 001** is the connection from NLC's private line and lift station to City manhole #2173.
- **Monitoring Point 001 (MP001)** MP001 is located in the overflow tank. A representative sample is collected via an automatic sampler and grab samples. Monitoring Point 001 captures the industrial wastewater in accordance with Section 13.12.040 OCCGF.

**Existing Effluent Characteristics and Treatment**

Data from discharge monitoring reports (DMR) from December 2018 to December 2023 is summarized in Table 1. Sample and analytical procedures were completed in accordance with 40 Code of Federal Regulation (CFR) 136. Samples listed with a “<” represent when all samples were non-detect and the method detection limit is listed.

<b>Table 1: Summary of Existing Limitations and Monitoring Data</b>					
<b>Parameter</b>	<b>Units</b>	<b>Existing Permit Specific Effluent Limits</b>	<b>Monitoring Data Values (December 2018- December 2023)</b>		
			<b>Highest Value</b>	<b>Average</b>	<b>Number of Samples</b>
Flow	GPD	65,000 gallons per day monthly average	79,924	45,673	1,312
Biochemical Oxygen Demand (BOD <sub>5</sub> )	mg/L	None <sup>1</sup>	1,100	540.5	135
Total Suspended Solids (TSS)	mg/L	None <sup>1</sup>	2,438	227.7	136
Oil and Grease	mg/L	--	278	124	21
pH, maximum	SU	12.5	11.8	9.9	194
pH, minimum	SU	5.5	11.8	9.48	194
Arsenic, Total	mg/L	1.57	0.008	0.0043	14
Cadmium, Total	mg/L	3.51	0.012	0.0015	14
Chromium, Total	mg/L	5.92	.027	0.0057	14
Chromium III	mg/L	0.57	0.018	0.0014	13
Chromium IV	mg/L	0.04	0.02	0.0067	13
Copper, Total	mg/L	--	0.403	0.1490	14
	lbs/d	0.062	0.1329	0.0507	13
Lead, Total	mg/L	0.14	0.071	0.0176	14
Mercury, Total	mg/L	0.02	0.02	0.0025	14
Nickel, Total	mg/L	0.59	0.019	0.008	14
Selenium, Total	mg/L	--	0.0032	0.0003	15
	lbs/d	0.0004	0.0011	0.0001	12
Silver, Total	mg/l	0.62	0.0014	0.0004	14
Zinc, Total	mg/L	2.13	0.62	0.3299	14
Sulfide, Total	mg/L	3,608	4	0.3215	13

<sup>1</sup>These are not effluent limits. However, additional surcharges are added when these concentrations are exceeded.

**Compliance History**

Compliance violations from December 2018 to December 2023 are listed in Table 2. During this time, six (6) compliance violations have occurred. Compliance violations have resulted in four (4) Level 2 Notice of Violations and two (2) Level 1 warnings.

<b>Table 2- Recent Violations</b>	
<b>Level 2 Violation – Notice of Violation</b>	
<b>Date of Occurrence</b>	<b>Summary of Violation</b>
6/15/20	Control Authority monitoring results showed a Selenium permit limit exceedance
12/16/20	Copper permit limit exceedance and no 24 hour notification
10/26/23	July DMR was 59 days late
10/26/23	Copper permit limit exceedance and no 24 hour notification
<b>Level 1 Violation - Warning</b>	
<b>Date of Occurrence</b>	<b>Summary of Violation</b>
9/14/21	COC date and time discrepancy
10/26/23	August DMR was 28 days late

Violations were resolved in a timely manner. Based on the historic effluent quality and NLC’s compliance history the City believes, pursuant to §13.12.050 G 3 OCCGF, that NLC’s combination of industrial and domestic wastewater discharge will be in compliance with the limitations established under Title 13 Chapter 12 of OCCGF.

**RATIONALE FOR PERMIT LIMITATIONS:**

The rationale for permit limitations is intended to meet the requirements of Title 13 Chapter 12 OCCGF as described in the following sections.

**Surcharge Thresholds**

Biochemical Oxygen Demand (BOD<sub>5</sub>) and Total Suspended Solids (TSS) are subject to surcharges when BOD<sub>5</sub> exceeds 200 mg/L concentration and when TSS exceeds 250 mg/L concentration. Pursuant to §13.18.060, Sewer Extra Strength Charges shall be levied in accordance with the approved Utility Rate Schedule in effect at the time of the discharge. Billing will be based on monthly average concentration of each parameter and the total monthly discharge (flow) reported by the Permittee unless the Permittee has entered into an alternate agreement with the City for determining the monthly billing.

Permittee may choose to pay under the pretreatment sewer charges in accordance with the approved Utility Rate Schedule in effect at the time of the discharge.

**General Prohibitions**

OCCGF Title 13, Chapter 12 includes a General Prohibition that industrial users may not introduce into the POTW any pollutants which cause Pass Through or Interference. The City does not anticipate NLC will cause or contributed to Pass Through or Interference of the POTW. The permit will contain the General Prohibition from OCCGF Title 13, Chapter 12.

### **Specific Prohibitions**

OCCGF Title 13, Chapter 12 includes a Specific Prohibition that an industrial user may not introduce into the POTW any pollutants which contain or cause any of the following:

1. Pollutants which create a fire or explosion hazard in the POTW. More specifically, no industrial user shall discharge any wastestream with a closed cup flashpoint of less than sixty (60) degrees Celsius (one hundred forty (140) degrees Fahrenheit) using the test methods specified in 40 CFR Section 261.21. The Director may require industrial users with the potential to discharge flammable, combustible or explosive substances to install and maintain an approved combustible gas detection meter or explosion hazard meter. No two (2) successive readings on an explosion hazard meter at the point of discharge shall be more than five (5) percent, nor any one (1) reading more than ten (10) percent, of the Lower Explosive Limit (LEL) of the meter.
2. Pollutants which will cause corrosive structural damage to the POTW but in no case discharges with pH lower than pH 5.5.
3. Solid or viscous substances which may cause obstruction in the sewage system or otherwise cause Interference to the POTW.
4. Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Pass Through or Interference with the POTW.
5. Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds forty (40) °C (one hundred four (104) °F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits.
6. Stormwater drainage from ground resulting in Infiltration and Inflow (I&I) through the industrial user's service line(s), surface, roof drains, catch basins, unroofed area drains (e.g. commercial car washing facilities) or any other source unless otherwise approved by the Director. Specifically prohibited is the connection of roof downspouts, exterior foundation drains, areaway drains, or other sources of surface runoff or ground water to a building sewer or building drain which in turn is connected directly or indirectly to the City's wastewater collection system. No person shall connect or discharge water from underground drains, sump pump discharges, natural springs and seeps, water accumulated in excavation or grading or any other water associated with construction activities.
7. A Slug Discharge as defined in Section 13.12.020.A OCCGF.
8. Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause Pass Through or Interference.
9. Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute health and safety hazards for employees of the City employed at the POTW.
10. Trucked or hauled pollutants except as authorized by the Director and only at discharge points designated by the Director.

11. Any water or waste which contains grease or oil or any other substances that will solidify or become discernibly viscous at temperatures between thirty-two (32) degrees Fahrenheit (32° F. or 0° Celsius) and one hundred fifty (150) degrees Fahrenheit (150° F or 65.5° Celsius) and cause or contribute to Interference or Pass Through.
12. Any pollutant directly into a manhole or other opening in the POTW unless specifically authorized by the City or as otherwise permitted under Title 13, Chapter 12 of OCCGF. Prohibited is the opening of a manhole or discharging into any opening in violation of Title 13, Chapter 12 of OCCGF.
13. Any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the City in compliance with applicable state or federal regulations.
14. Liquid wastes from chemical toilets, and trailers, campers or other recreational vehicles which have been collected and/or held in tanks or other containers shall not be discharged into the POTW except at locations authorized by the City to collect such wastes.

The City does not believe NLC's process will result in violation of specific prohibitions in accordance with 13.12.030 OCCGF.

### **Technology-Based Effluent Limits**

Title 40, Chapter I, Subchapter N, Parts 405-471 of the Code of Federal Regulations (CFR) establish Effluent Guidelines and Standards (ELGs) for point sources dischargers promulgated by the United States Environmental Protection Agency (EPA) as required by Section 307 (b) and (c) (33 U.S.C. 1317(b) and (c)) of the federal Clean Water Act (CWA). More specifically the ELGs contain industry specific technology-based effluent limits that constitute the pretreatment standards applicable to indirect point source dischargers. An indirect discharger is a point source discharger that discharges indirectly via a Publicly Owned Treatment Works (POTW), such as the City of Great Falls POTW. These prescribed pretreatment technology-based effluent limits are incorporated by definition in 13.12.020 OCCGF as Categorical Pretreatment Standards.

Section 13.12.030 C OCCGF requires all industrial users subject to a Categorical Pretreatment Standard to comply with said standard. As described in 40 CFR 405-471, Categorical Pretreatment Standards are generally applicable based on the industrial activity conducted at the site. Industrial activities can be classified by the Standard Industrial Classification (SIC) code established by the federal Occupational Safety and Health Administration and the North American Industry Classification System (NAICS) developed by the U.S. Economic Classification Policy Committee. NLC's NAICS code is 812320 – Dry Cleaning and Laundry Services. EPA has not promulgated Categorical Pretreatment Standards that specifically apply to operations with discharges from industries with these SIC and NAICS codes.

### **Local Limits and Permit Specific Limits**

Section 13.12.030.C.2 and 4 OCCGF establish the City of Great Falls Maximum Contribution from significant industrial users, also referred to as "Local Limits" and the authority for facility or permit specific limits. In accordance with 40 CFR 403.5 (c), the City's Local Limits are designed to establish the maximum concentration or total load the City may receive from permitted industrial users for certain toxic and prolific parameters in order to prevent Interference or Pass Through in the POTW and maintain compliance with the City's MPDES permit. Therefore, the City finds, pursuant to §13.12.050.G.3, NLC discharge in compliance with the permit limits established below is not expected to result in a violation by the City of the terms and conditions of the City's MPDES Permit or cause Pass Through or Interference.

**FINAL PERMIT LIMITS:**

Final effluent permit limits are provided in Table 3. Rationale for each parameter’s limit is explained.

<b>Table 3. Final Numeric Effluent Limits Outfall 001</b>		
Parameter	Limit <sup>1</sup>	Rationale
Flow	88,000 gpd	Permit Application & Discharge History
Biochemical Oxygen Demand, (BOD <sub>5</sub> )	None <sup>3</sup>	Permit Rationale & Section 13.18.060 OCCGF
Total Suspended Solids (TSS)	None <sup>3</sup>	Permit Rationale & Section 13.18.060 OCCGF
pH <sup>2</sup>	Greater than or equal to 5.5 S.U. Less than 12.5 S.U.	Section 13.12.030.B.2 OCCGF 40 CFR 403.13(p) and 40 CFR261
Arsenic, Total	0.00413 lbs per day	Section 13.12.030.C.2 OCCGF & allocation calculations
Copper, Total	0.12273 lbs per day	Section 13.12.030.C.2 OCCGF & allocation calculations
Selenium, Total	0.00235 lbs per day	Section 13.12.030.C.2 OCCGF & allocation calculations
Cadmium, Total	0.052 mg/L	Section 13.12.030.C.2 OCCGF
Chromium, Total	1.621 mg/L	Section 13.12.030.C.2 OCCGF
Lead, Total	1.087 mg/L	Section 13.12.030.C.2 OCCGF
Mercury, Total	0.02 mg/L	Section 13.12.030.C.2 OCCGF
Nickel, Total	0.612 mg/L	Section 13.12.030.C.2 OCCGF
Silver, Total	0.314 mg/L	Section 13.12.030.C.2 OCCGF
Zinc, Total	2.183 mg/L	Section 13.12.030.C.2 OCCGF
Sulfide, Total	61.3 mg/L	Section 13.12.030.C.2 OCCGF
<sup>1</sup> All limits are daily maximum values unless specified otherwise. <sup>2</sup> No discharge shall occur with a pH lower than 5.5 s.u. Any pH discharge greater than or equal to 12.5 is subject to the hazardous waste reporting criteria required by 40 CFR 403.12(p) (1-4), section VI.B – Hazardous Waste Notification. This is an instantaneous limit. <sup>3</sup> Surcharges are assessed for BOD <sub>5</sub> exceeding 200 mg/L and TSS exceeding 250 mg/L.		

**Flow:** The permit limit for flow is based on DMR data which reported a maximum daily flow of 79,924 gallons per day. A safety factor of 1.1 was applied to the maximum daily flow of 88,000 gallons per day.

**BOD<sub>5</sub> & TSS:** In accordance with Section 13.18.060 OCCGF, surcharge fees apply for BOD<sub>5</sub> exceeding 200 mg/L and TSS exceeding 250 mg/L.

**pH:** pH limits are determined by 40 CFR 403.12(p) (1-4), section VI.B – Hazardous Waste Notification. Hazardous Waste pH limit of 12.5 in accordance with 40 CFR 261, specifically parts 261.22 and 261.23.

**Metals:** The POTW was not specifically designed for metals removal. Concentration-based metals local limits are codified in Section 13.12.030.C.2 OCCGF. The City’s MPDES permit includes an effluent limit for arsenic. There is reasonable potential for discharge of arsenic from industrial users to cause POTW interference. Additionally, the water quality standards (WQS) for copper and selenium create reasonable potential for discharge of copper and selenium to cause POTW interference. Additional rationale for arsenic, copper, and selenium load-based limits are included below. All load limits are based on a maximum daily discharge of 0.088 MGD.

- **Arsenic:** The City has struggled to comply with the MPDES arsenic limit. Therefore, any exceptional arsenic loading could cause Pass Through. Load allocations for arsenic are based on total arsenic for all industrial users. The load limit is based on a maximum daily discharge of 0.088 MGD.
- **Copper:** Load allocations for copper are based on total copper loading for all industrial users and the maximum allowable industrial loading.
- **Selenium:** Load allocation for selenium is based on total loading for all industrial users and the maximum allowable industrial loading.

## **RATIONALE FOR MONITORING AND REPORTING REQUIREMENTS:**

Section 13.12.040, 13.12.050 I, and 13.12.070 OCCGF establish the authority and requirements for effluent compliance monitoring. NLC is required to use 40 CFR 136 methods or an approved Alternate Test Procedures for all sample analyses (13.12.070 OCCGF). Outfall 001 discharge constitutes Industrial Waste per Section 13.12.020 OCCGF.

### Monitoring and Reporting Requirements

**Reporting Requirements:** Submit annual proof of wastewater meter calibration.

**Monitoring and Reporting:** Table 4 provides the Final Monitoring Reporting Requirements. Rationale for monitoring parameters which do not have permit effluent limits is included following Table 4.

Table 4. Final Monitoring and Reporting Requirements			
Parameter	Units	Minimum Monitoring Frequency	Sample Type
Flow rate	gpd	Continuous	Metered
pH	SU	Continuous	Metered
Biochemical Oxygen Demand (BOD <sub>5</sub> ) <sup>1</sup>	mg/L lb/day	2/month	Composite
Total Suspended Solids (TSS) <sup>1</sup>	mg/L lb/day	2/month	Composite
Oil & Grease – Total Recoverable	mg/L	2/month	Grab
Arsenic, Total	mg/L	2/year	Composite
	lbs/day	2/year	Composite
Copper, Total	mg/L	2/year	Composite
	lbs/day	2/year	Composite
Selenium, Total	mg/L	2/year	Composite
	lbs/day	2/year	Composite
Cadmium, Total	mg/L	2/year	Composite
Chromium, Total	mg/L	2/year	Composite
Lead, Total	mg/L	2/year	Composite
Mercury, Total	mg/L	2/year	Composite
Nickel, Total	mg/L	2/year	Composite
Silver, Total	mg/L	2/year	Composite
Zinc, Total	mg/L	2/year	Composite
Sulfide, Total	mg/L	2/year	Grab
Ammonia, as N <sup>2</sup>	mg/L	2/year	Composite
Nitrogen, Total <sup>2</sup>	mg/L	2/year	Composite
Nitrogen, Nitrate+Nitrite as N <sup>2</sup>	mg/L	2/year	Composite
Nitrogen, Kjeldahl, Total as N <sup>2</sup>	mg/L	2/year	Composite
Phosphorus, Total as P <sup>2</sup>	mg/L	2/year	Composite
Cyanide, Total <sup>2</sup>	mg/L	Annually	Composite
Total Phenols <sup>2</sup>	mg/L	Annually	Grab

<sup>1</sup> There are Sewer Extra Strength Charges associated with discharging BOD<sub>5</sub> at concentrations greater than 200 mg/L and/or discharging TSS at concentrations greater than 250 mg/L.

<sup>2</sup> There is no permit limit associated with this monitoring parameter. Twice per year sampling shall be completed during the first and third quarters or during the second and fourth quarters.

**Cyanide, Total and Total Phenol:** Cyanide, Total and Total Phenol were potential pollutants of concern in the previous POTW MPDES permit cycle. Additional data is needed.

**Nutrients:** The Montana Department of Environmental Quality (DEQ) is in the process of establishing nutrient water quality standards (WQS) for the Missouri River. Nutrients are likely to become parameters of concern for Industrial Pretreatment in the future. No effluent limit is being incorporated into this permit; however, monitoring for ammonia, Total Kjeldahl Nitrogen (TKN), nitrite (NO<sub>2</sub>), nitrate (NO<sub>3</sub>), total nitrogen (TN), and total phosphorus (TP) will be included in monitor sampling.

## **RATIONALE FOR SPECIAL CONDITIONS:**

### **Pretreatment Requirements and Best Management Practices**

As mentioned previously Section 13.12.050.G OCCGF, in part, establishes that the City will issue an Industrial Wastewater Discharge Permit to an applicant only if the City finds that the discharge is in compliance with the limitations established in Chapter 12. Section 13.12.030.C.4 OCCGF establishes that the City may impose requirements in addition to Local Limits and permit specific effluent limits including pretreatment requirements and best management practices, when the City finds they are necessary to comply with Chapter 12. Section 13.12.040 reinforces the requirement for pretreatment further by requiring industrial users to provide necessary wastewater treatment in order to comply with Chapter 12. The permit outlines sampling if NLC begins laundering shop towels and/or printer towels.

### **Compliance Schedule**

Submittal of additional documentation and completion of system modifications are required as part of the following compliance schedule:

- **Compliance must be achieved within 60 days of the effective date of this permit:**
  - Submit product information and installation plans to COGF ENV for proposed flow meter and pH meter for City's review.
- **Compliance must be achieved within 120 days of the effective date of this permit:**
  - Install flow meter at Outfall 001 in accordance with 13.12.040.J OCCGF.
  - Install pH meter at Outfall 001 in accordance with 13.12.040.I OCCGF.

## **PUBLIC PARTICIPATION:**

The Official Code of the City of Great Falls at 13.12.050.G.2 requires, "Where the City is establishing permit specific Pretreatment Standards, the permit shall be noticed for public comment for thirty (30) days in a newspaper of general circulation that provides meaningful public notice." Pretreatment Standard is defined at Section 13.12.020 OCCGF as any regulation containing pollutant discharge limits promulgated by the EPA in accordance with section 307(b) and (c) of the Act [Federal Clean Water Act], which applies to industrial users. As such, on April 24, 2024, notice was posted in the Great Falls Tribune that comments would be taken for 30 days on the permit.

## **REFERENCES:**

National Laundry Company, Industrial Wastewater Permit Application Form and Attachments, March 16, 2018 and April 19, 2018.

Official Code of the City of Great Falls, Title 13, Chapter 12, *Industrial Pretreatment Program*

US Code of Federal Regulations, 40 CFR Parts 400-471, *Effluent Guidelines and Standards*

US Code, Title 33, Sections 1251-1387, *Federal Water Pollution Control Act*, as amended.