



PROTOCOL
For
ACCEPTING WASTEWATER
From
SIGNIFICANT INDUSTRIAL USERS

Purpose: To establish a written protocol to ensure that all Significant Industrial Users, (SIU) are permitted to discharge industrial and domestic wastewater into the Hopkinsville Water Environment Authority (HWEA), Publicly Owned Treatment Works (POTW). This protocol sets forth the guidelines which must be followed to ensure satisfactory service to both existing and future HWEA customers while continuing to protect our environment.

1. Any discharge into the HWEA POTW shall be in strict compliance with the Environmental Protection Agency's Code of Federal Regulations, administered by the Kentucky Division of Water (KYDOW), and the City of Hopkinsville, Code of Ordinances, Title IV - Public Works, Chapter 52 - Wastewater Collection and Treatment, administered by HWEA.
2. Discharge of wastewater may not commence until an approved Industrial User Discharge Permit, (IUDP), has been granted to the SIU by the HWEA. This permit is acquired by submitting an IUDP application to the HWEA. The IUDP application shall be submitted to the following address;

Mr. Derrick W. Watson, President & CEO
Hopkinsville Water Environment Authority
401 East Ninth Street
PO Box 628
Hopkinsville, KY 42241-0628

ATTN: Environmental Compliance Coordinator
T # (270) 887-1680

PROTOCOL
For
ACCEPTING WASTEWATER
From
SIGNIFICANT INDUSTRIAL USERS

3. HWEA requires 10 working days in order to properly review the application. This time frame may vary if the application is rejected or if the information in the application is incomplete.
4. After HWEA has approved the application, HWEA will submit a draft IUDP to KYDOW. KYDOW requires 90 days to review the application and draft IUDP.
5. Prior to the issuance of IUDP, the SIU shall purchase and install a refrigerated, 24 hour composite wastewater sampling device, which is acceptable to the HWEA. A shop drawing describing the sampler's specifications shall be submitted to HWEA, for approval, prior to purchase or installation. The sampler shall be installed at the end of process or pre-treatment, prior to convergence with any dilute water source, such as domestic wastewater, boiler blow down, non-contact cooling water, etc.
6. An HWEA technician shall collect an annual sample from the previously mentioned sampling device. The sample shall be analyzed for the parameters which are listed in the IUDP. HWEA shall have full access to the sampler, as requested. While this annual sampling event is unannounced, HWEA will split samples with any designee as specified by SIU. However, any additional sampling is the sole cost of the SIU and no portion shall be paid by HWEA.
7. An Annual Wastewater Scan, (AWS), shall be completed by each SIU prior to March 30th and the results submitted to the HWEA by April 30th of each year. The pollutants for the AWS are listed in the City of Hopkinsville, Code of Ordinances, Title IV - Public Works, Chapter 52 - Wastewater Collection and Treatment. The AWS shall be conducted for the SIU by an independent laboratory and the results, complete with EPA certification statement, shall be submitted to the HWEA.
8. A Total Toxic Organics Scan, (TTOS), shall also be completed by each SIU, and submitted to the HWEA semi-annually, on or before April 30th and October 31 of each year. The TTOS is required of any SIU with wastewater containing or suspected of containing toxic organics. The TTOS shall be conducted for the SIU by an independent laboratory and the results, complete with EPA certification statement, shall be submitted to the HWEA.

PROTOCOL
For
ACCEPTING WASTEWATER
From
SIGNIFICANT INDUSTRIAL USERS

9. A Total Toxic Organics Management Plan, (TOMP), shall be submitted to the HWEA, along with the TTOS, outlining measures and methods which are in place to prevent an accidental spill of organics to floor drains, collectors, basins, or any other structure which discharges to the POTW. This TOMP should also outline actions which shall be taken by the SIU should an accidental spill occur.
10. The HWEA may choose to release an SIU from TTOS. However, an SIU can not be released from TTOS, until a TTOS confirms that no toxics are present in SIU's wastewater. In addition, a statement certifying that no organics are being processed by the SIU shall be executed by the Plant Manager and submitted to the HWEA. Release from TTOS does not release the SIU from submitting a TOMP. Should at any time the HWEA suspect that organics are being introduced into wastewater by an SIU which has been released from TTOS, the SIU shall conduct a TTOS at the request of the HWEA, at no cost to HWEA.
11. In an event where an SIU is in non-compliance with the parameters as set forth by the IUDP, HWEA will commence enforcement actions. Events which require enforcement action include, but are not limited too; illegal discharge, discharge standard violations, sampling/monitoring violations, compliance schedule violations, spill incidents, field inspection violations, permit or ordinance condition violations, inadequate record keeping violations, reporting violations, and late responses to request for information violations. HWEA enforcement actions include, but are not limited too, the following;
 - a. Surcharges / Monetary Penalties
 - b. Informal Telephone Call
 - c. Notice of Violation
 - d. Significant Non-Compliance
 - e. Public Notice of Significant Non-Compliance
 - f. Informal Meeting
 - g. Show Cause Meeting
 - h. Administrative Order
 1. Monetary Penalty - Minimum \$ 1,000 per day / per violation
 - i. Civil Suit
 1. Monetary Penalty - Minimum \$ 1,000 per day / per violation
 - j. Criminal Suit
 - k. Termination of Service

PROTOCOL
For
ACCEPTING WASTEWATER
From
SIGNIFICANT INDUSTRIAL USERS

12. Surcharges shall be imposed for violations of Biochemical Oxygen Demand, (BOD), Total Suspended Solids, (TSS), and Ammonia Nitrogen, (NH₃N). Surcharge rates are as follows;

Parameter	Penalty Per Pound of Parameter Over IUDP Discharge Limit
BOD	\$ 0.21
TSS	\$ 0.21
NH ₃ N	\$ 1.45

HWEA will determine the appropriate enforcement action and or surcharge for violations of any other pollutants exceeding the discharge limits set forth in the IUDP.

13. All test analyses shall be accompanied by an executed EPA certification statement, on company letterhead.
14. All correspondence to the HWEA shall be made in writing. Any oral interpretations or commitments shall not be honored.
15. Items listed within this protocol are subject to change without notice.

Attachments to This Protocol

Industrial User Discharge Permit Application

City of Hopkinsville Ordinance - Chapter 52, Wastewater Collection & Treatment

EPA Certification Statement

January 2021