MMSD
PARTNERS FOR A CLEANER ENVIRONMENT

April 22, 2014

Mr. Scott Swosinski
Mid-America Steel Drum
3950 South Pennsylvania Avenue
Saint Francis, WI 53235

Subject: Wastewater Discharge Permit 5032.05

Dear Mr. Swosinski:

Revised Wastewater Discharge Permit 5032.05 is enclosed. This permit establishes various effluent limits, sampling requirements, and other conditions for the discharge of wastewater to the District's sewerage system.

This permit has been revised to reflect the relocation of business processes to the Pennsylvania Avenue facility. Due to the relocation, sampling and reporting requirements for Outfall 1.1, have been removed from the permit. Requirements for sampling and reporting, at Outfall 2.0, remain the same. Mid-America Steel Drum is still authorized to discharge until October 26, 2018.

If you have any questions regarding the new permit or if you find errors, please contact Beth Stroik, Senior Industrial Waste Engineer, at (414) 225-2157. Thank you for your cooperation.

Sincerely,

Peter R. Topczewski
Director of Water Quality Protection

PRT:EJS:jlr

Enclosure

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Milwaukee Metropolitan Sewerage District
260 W. Seeboth Street, Milwaukee, WI 53204-1446
414-272-5100 www.mmsd.com

MMSD
PARTNERS FOR A CLEANER ENVIRONMENT

WASTEWATER DISCHARGE PERMIT 5032.05

The Milwaukee Metropolitan Sewerage District (District) has issued this wastewater discharge permit to:

Mid-America Steel Drum Company
3950 South Pennsylvania Avenue
Saint Francis, Wisconsin 53235

This permit is issued according to sec. 200.45, Wis. Stats., and ch. 11, MMSD Rules. The Permittee shall comply with the pretreatment standards, monitoring requirements, and other conditions set forth in this permit.

Chapter 6, MMSD Rules, provides procedures for the administrative review of the conditions contained in this permit. These procedures are the exclusive means for the Permittee to seek amendments to this permit. The right to an administrative review of this permit expires 30 days after receiving this permit. Failure to exhaust these administrative review procedures may preclude judicial review. The Permittee must comply with this permit during the review in any form of any challenge to this permit, according to sec. 11.815, MMSD Rules.

This permit becomes effective on the date of signature and expires at midnight, **October 26, 2018**. The Permittee may continue discharging after this date only if the District reissues this permit. The Permittee must apply for renewal of this permit according to the requirements of sec. 11.305, MMSD Rules, at least 60 days before the expiration date of this permit.

For Peter R. Topczewski

Kevin L. Shafer, P.E.

Executive Director

Dated this 22ND day of APRIL, 2014

WASTEWATER DISCHARGE PERMIT 5032.05

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Part 1 – Limits

1.01 Introduction

Discharges from the outfalls regulated by this permit are subject to the local limits established by the District in sec. 11.203, MMSD Rules. Based upon these requirements, the District has established the pretreatment standards set forth in secs. 1.02 and 1.03 of this permit.

1.02 Outfall 2.0

1) Outfall 2.0 is outside the facility at 3950 South Pennsylvania Avenue, on the west side, between the facility and Pennsylvania Avenue, on the north side of the driveway, in a sewer entry point (sampling manhole).
2) Outfall 2.0 shall contain all of the Permittee's process wastewater discharges and only process wastewater.
3) The following limits apply to discharges from Outfall 2.0:

Local Limits

Pollutant[1]	Maximum For Any One Day (mg/L)
Ammonia	224.0
Arsenic	0.6
Cadmium	1.5
Chromium	64.0
Copper	6.0
Cyanide	2.9
HEM[2]	300.0
Lead	2.0
Mercury	0.0026
Molybdenum	12.0
Nickel	4.0
Silver	5.8
Zinc	8.0
Organic Priority Pollutants[3]	5.0

(1) Pollutants listed are totals

(2) Hexane extractable materials, also known as total Oil and Grease

(3) This is the sum of the concentration of detected volatile and semi -volatile organic compunds listed in 40 CFR 423, Appendix A, other than pesticides, PCBs, dioxins, and furans.

4) The pH of the Permitee's discharge shall be greater than 5.0 at all times.

Part 2 – Sampling

2.01 Sampling Frequency

The Permittee shall sample at least once between January 1 and June 30 and at least once between July 1 and December 31 for all of the pollutants included in sec. 1.02, pH, and flow.

2.02 Representative Samples

The Permitee's self-monitoring shall represent production activities and discharges normally occurring during the reporting period.

2.03 Sample Collection and Analysis

1) The Permittee shall utilize District approved flow proportioned collection equipment at Outfall 2.0.
2) The primary device for flow measurement shall be a six inch Palmer-Bowlus flume at Outfall 2.0.
3) The Permittee shall collect grab samples for hexane extractable materials, cyanide, and volatile organic compounds.
4) The Permittee shall instantaneously measure the pH using either a portable pH meter or grab sample free of acidic or alkaline preservatives.
5) Sampling by the Permittee shall be independent of sampling by the District.
6) The Permittee shall collect, preserve, and analyze samples using techniques that provide sufficient precision and accuracy to measure the regulated pollutants at or below the applicable limit to a reasonable degree of scientific certainty, using analytical methods included in 40 CFR Part 136 or ch. NR 219, Wis. Adm. Code, or other methods approved by the Department of Natural Resources. For analysis, the Permittee shall use a laboratory certified or registered by the Department of Natural Resources, according ch. NR 149, Wis. Adm. Code, for the parameter being analyzed.

Part 3 – Reporting

3.01 Self-monitoring Reports

The Permittee shall submit to the District self-monitoring reports that include the following information. These reports are due before the date established by sub. (6).

1) Sample results

   The Permittee shall report to the District the results of all sampling required by part 2. If the Permittee monitors a pollutant more frequently than required by this permit using the sample type and the sample collection, preservation, and the analytical techniques set forth in part 2, then the Permittee shall also report the results of this monitoring to the District. Reports shall include:

   a) The place, date, type and time of the sample;
   b) The names of persons collecting the samples, the persons doing the analyses, and the laboratory performing the analyses;
   c) The dates the analyses were performed;
   d) The analytical techniques used; and
   e) The analytical results

2) Average and maximum flow rates

   a) For each outfall identified in sec. 1.02 of this permit, the Permittee shall report the average and maximum daily process wastewater flow rates for the period since the last period for which the Permittee reported these flow rates. For the Permittee's first report, the Permittee shall report flows for either the six months preceding the self-moritoring report or the time since the commencement of discharge, whichever is shorter. The Permittee shall indicate the starting and ending dates of the period covered by the reported flow rates.
   b) If an outfall contains domestic wastewater or other non-process wastewater, then the Permittee shall include average and maximum flow rates for these types of wastewater.
   c) The Permittee may estimate these flow rates.
   d) The Permittee shall indicate whether the reported flows are measurements or estimates. If the Permittee is reporting estimated flows, then the Permittee shall provide all of the information and calculations used to obtain the estimates. If calculating an estimated flow by dividing a long-term discharge volume by a number of days, then the Permittee shall count only the days when a discharge occurred.

3) Prohibited pollutant certification

   The Permittee shall include the following certification in self-monitoring reports:

To the best of my knowledge, my facility does not store, use, or create the pollutants prohibited by sec. 11.202(13), MMSD Rules, in any process, activity, or operation. My knowledge is based upon a visual inspection of my facility, information supplied by material safety data sheets, and my understanding of the processes, activities, and operations at my facility. This certification does not apply to polychlorinated biphenyls.

I have no reason to believe that polychlorinated biphenyls are discharged by my facility to the sewerage system.

4) General Certification

   The Permittee shall include the certification set forth in sec. 3.08 in self-monitoring reports.

5) Signature

   A person who satisfies the requirements of sec. 11.417, MMSD Rules, shall sign self-monitoring reports.

6) Reporting deadline

   The Permittee shall submit self-monitoring reports to the District no later than the last day of the month following the month in which the sample was collected.

3.02 Hauled Wastewater Reports

1) For any wastewater that has been shipped off-site for disposal, the Permittee shall report the category, manufacturing process, volume, destination, hauler, and shipping date. For the purposes of this subsection, "wastewater" does not include sludge or solid waste shipped to treatment, storage, or disposal facilities licensed under solid and hazardous waste management laws.
2) The reports required by this section shall contain the certification set forth in sec. 3.08 and be signed according to sec. 11.417, MMSD Rules.

3.03 Report of Violation and Resampling

1) If sampling performed by the Permittee identifies a violation of any applicable pretreatment standard or requirement, the Permittee shall:
   a) Notify the District within 24 hours of becoming aware of the violation,
   b) Provide a written report with sample results to the District within 5 days after becoming aware of the violation, and
   c) Repeat the sampling and analysis and submit the results of the repeat analysis to the District within 30 days after becoming aware of the violation.

2) The reports required by sub. (1) shall contain the certification set forth in sec. 3.08 and be signed according to sec. 11.417, MMSD Rules.

3.04 Reporting of Upsets, Spills, Other Slugs, and Emergencies

1) The Permittee shall immediately notify the District of an upset, spill, or other slug that has a reasonable potential to cause a violation of any pretreatment standard or requirement.
2) The report required by sub. (1) shall include:
    a) The location, date, and time of the discharge;
    b) The character and volume of the discharged material; and
    c) Containment or other corrective action taken by the Permittee.
3) Within 5 days after the report required by sub. (1), the Permittee shall submit to the District a written report describing the cause of the discharge, the duration of the discharge, and the measures taken by the Permittee to prevent similar occurrences in the future.
4) The report required by sub. (3) shall contain the certification set forth in sec. 3.08 and be signed according to sec. 11.417, MMSD Rules.
5) The Permittee shall immediately notify the District at 414-282-7200 (24 hours per day) of any emergency that may affect the sewerage system.

3.05 Bypass Reports

1) If the Permittee knows in advance of the need for a bypass, then the Permittee shall notify the District at least ten days before the bypass, if possible, or otherwise immediately.
2) If the Permittee has a bypass that causes a violation of a pretreatment standard or requirement and the Permittee did not anticipate the bypass, then the Permittee shall:
    a) Orally notify the District of the bypass within 24 hours of becoming aware of the bypass, and
    b) Provide a written notification within 5 days after becoming aware of the bypass that describes:
        i) The bypass and its cause;
        ii) The date and time of when the bypass began and the date and time of either the end of the bypass, if the bypass has ceased, or the expected end of the bypass, if the bypass has not ceased; and
        iii) The steps taken or planned to prevent reoccurrence of the bypass.
3) The report required by sub. (2)(b) shall contain the certification set forth in sec. 3.08 and be signed according to sec. 11.417, MMSD Rules.

3.06 Notice of Intent to Change Discharge

Before any activity that would either result in a 20 percent long-term increase or decrease in the volume of non-domestic wastewater discharged by the Permittee or that would significantly change the characteristics of the discharge, the Permittee shall submit a written Notice of Intent to the District.

3.07 Hazardous Waste Reports

The Permittee shall report discharges of hazardous waste according to sec. 11.412, MMSD Rules.

3.08 General Certification

The reports required by this permit shall contain the following certification:

> *I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

3.09 Report Submission

The Permittee shall submit all reports required by this permit to the Permittee's District Contact by one of the following methods:

1) Send through the mail to:

   Milwaukee Metropolitan Sewerage District
   Industrial Waste Department
   260 West Seeboth Street
   Milwaukee, WI 53204

2) Deliver reports directly to District Headquarters, at the above address.
3) Create a scanned copy (.pdf format) and send via email, then send original signed certification page via mail.
4) Fax to (414) 272-0270, then send original signed certification page via mail.

Part 4 – General Conditions

4.01 General Prohibitions

1) The Permittee may not discharge to the sewerage system except in compliance with ch. 11, MMSD Rules, and this permit.
2) The Permittee may not discharge any pollutant to the sewerage system in a quantity or concentration that, alone or in conjunction with other discharges:
    a) Inhibits or disrupts the sewerage system or its sludge processes; and
    b) Is a cause of a violation of the District's WPDES permits or air pollution control permits;
    c) Increases the magnitude or duration of a violation;
    d) Prevents the use or disposal of sewage sludge in compliance with any applicable local, state, or federal statutes, ordinances, regulations, permits, or other requirements; or
    e) Inhibits the marketing of treated sewage sludge.
3) The Permittee may not discharge to the sewerage system any pollutant in a quantity or concentration that, alone or in conjunction with other discharges, is a cause of a discharge from the sewerage system to waters of the state that violates the District's WPDES permits or increases the magnitude or duration of a violation.

4.02 Prohibited Discharges

The Permittee may not discharge to the sewerage system:

1) Pollutants that create a fire or explosion hazard in the sewerage system, including but not limited to pollutants that result in wastewater with a closed cup flashpoint of less than 60o C (140o F);
2) Pollutants that will cause corrosive structural damage to the sewerage system, including but not limited to discharges with a pH lower than 5.0 s.u.;
3) Solid or viscous pollutants that will obstruct the flow in the sewerage system;
4) Heat in amounts that will cause interference by inhibiting the biological activity in the treatment plant, including but not limited to heat in an amount that causes the influent of the treatment plant to exceed 40o C (104o F).
5) Used motor vehicle anti-freeze, motor oil, brake fluid, transmission fluid, hydraulic fluid, oil based paint, and paint thinners if the material is in a collectable and recyclable quantity or if the discharge would result in a violation of the oil and grease limit set forth in sec. 11.203(1), MMSD Rules;
6) Pollutants that result in the presence of toxic gases, vapors, or fumes within the sewerage system in a quantity that may cause acute worker health and safety problems;

7) Hauled waste, except for hauled waste that:
    a) Consists only of domestic wastewater, and
    b) Is discharged at a point designated by the District;
8) Any substance that may cause the sewerage system's treatment residues, sludges, or scums to be unsuitable for reclamation and reuse, that causes interference with the reclamation process, or that inhibits the marketing of treated sewage sludge;
9) Any wastewater that contains radioactivity in amounts greater than a drinking water standard established by the U.S. Environmental Protection Agency or the Department of Natural Resources;
10) Storm water, surface water, groundwater, roof runoff, subsurface drainage, single pass non-contact cooling water, cooling tower blow down, and reverse osmosis concentrate from any site served by separated sewers or riparian to waters of the state, according to sec. 11.202(10), MMSD Rules.
11) Any non-domestic wastewater before the District has approved a notice of intent submitted according to sec. 11.401, MMSD Rules; and
12) Any mass, concentration, or volume of a substance in excess of the amount allowed in this wastewater discharge permit.

4.03 Prohibited Pollutants

The Permittee may not discharge to the sewerage system the following pollutants, as determined by the methods set forth in sec. 11.202(13), MMSD Rules:

Prohibited Pollutants

Acrolein	Furans
Alkylated lead	Heptachlor
Benzo(a)pyrene	Hexachlorobenzene
Chlordane	Lindane(BHC)
Dieldrin	Mirex
Dioxins	Pentachlorobenzene
3,3'-Dichlorobenzidine	Polybrominated biphenyl ethers
4,4'-Dichlorodiphenyltrichloroethane (DDT)	Polychlorinated biphenyls (PCBs)
Endosulfan	1,2,4,5-Tetrachlorobenzene
Endrin	Toxaphene
Fluoranthene	2,4,6-Trichlorophenol

4.04 Duty to Mitigate

The Permittee shall take all reasonable actions necessary to minimize and correct any adverse impacts to the sewerage system or the environment resulting from noncompliance with this permit.

4.05 Dilution Prohibition

The Permittee may not increase the use of process water or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with any applicable pretreatment standard or requirement. The District may impose mass limits on permittees who use dilution to meet the applicable pretreatment standards or requirements or in any other case where mass limits are appropriate.

4.06 Bypass Prohibition

1) Intentional bypass is prohibited.
2) The Permittee shall report bypasses according to sec. 3.05.

4.07 Proper Disposal of Pretreatment Sludges

The Permittee shall dispose sludges generated by wastewater treatment systems according to all applicable local, state, and federal requirements. If a sludge is a hazardous waste according to the criteria set forth in sec. NR 605, Wis. Admin. Code, then the Permittee shall satisfy the requirements of either secs. NR 610 or NR 615, Wis. Admin. Code.

4.08 Compliance with All Local, State, and Federal Requirements

The Permittee shall comply with all applicable pretreatment standards and requirements set forth in ch. 11, MMSD Rules, the Code of Federal Regulations, and the Wisconsin Administrative Code, regardless of their enumeration in this permit.

4.09 No Property Rights Created

This permit does not convey or create any private property rights.

4.10 Permit Modification

The District may modify this wastewater discharge permit at any time to reflect changes in federal, state, or local law, to incorporate the terms of an order, or to reflect changed circumstances.

4.11 Permit Transfer

This wastewater discharge permit is issued to the Permittee for specific processes and operations at a specific location. If any person is seeking to become an owner of the facility to which this permit applies or operator of the processes or operations to which this permit applies, then that person shall apply to the District for a transfer of this wastewater discharge permit before becoming an owner or operator. If an owner or operator changes without the prior approval of the District, then this permit is void.

4.12 Sampling Location

The Permittee may change monitoring locations only after receiving approval from the District. The District shall ensure that any change in the Permittee's monitoring location will not allow the Permittee to substitute dilution for adequate treatment.

4.13 Sampling Facilities

1) The Permittee shall provide sampling facilities that will be accessible and that will provide representative samples of the process wastewater.
2) The Permittee shall locate, construct, and maintain sampling facilities according to the requirements of the District.
3) The Permittee's sampling facility shall have sufficient room to allow the installation of sampling and flow monitoring devices.
4) The Permittee shall submit to the District plans and specifications for construction or modification of sampling facilities at least 30 days before the proposed commencement of construction or modification. If the Permittee constructs or modifies a sampling facility before District approval or without inspection during construction and if the District determines that the sampling facility is unacceptable, then the Permittee shall reconstruct or modify the sampling facility according to the requirements of the District.
5) The Permittee shall maintain sampling facilities in a safe, operating condition at all times.
6) The Permittee shall allow the District access to all sampling facilities according to the requirements of sec. 4.18.

4.14 Record Keeping Requirements

The Permittee shall retain and preserve for no less than 5 years all records relating to monitoring, sampling, and analyses made by or on behalf of the Permittee. If a record pertains to matters that are the subject of an order, litigation, or other enforcement action, then the Permittee shall retain and preserve the record until all enforcement activities have concluded and all periods of limitations for appeals have expired. The Permittee shall make these records available to the District upon request for inspection and copying.

4.15 Review of Proposed Treatment Facilities

1) If the Permittee is planning to install or modify treatment facilities or operations to comply with a categorical pretreatment standard, a pretreatment standard set forth in sec. 11.203, MMSD Rules, a permit condition, or an order of the District, then the Permittee shall provide the District with plans, specifications, and operating procedures for the proposed facilities. The District may approve, conditionally approve, or disapprove the plans, specifications, and operating procedures. The

Permittee may not begin discharging from the treatment facilities until the Permittee has satisfied the requirements of the District.

2) The Wisconsin Department of Natural Resources has separate requirements for the review of plans, specifications, and operating procedures of proposed pretreatment facilities, such as the requirements set forth in sec. 144.04, Wis. Stats., and ch. NR 108, Wis. Admin. Code. The Permittee shall comply with these requirements before commencing discharges to the sewerage system.

4.16 Additional Reports

In addition to the reports required by this permit and the reports specifically required by ch. 11, MMSD Rules, the District may require other reports, management plans, or other information whenever the District finds that such a requirement is necessary to fulfill the District's responsibilities under ch. 11, MMSD Rules, or any other local, state, or federal law.

4.17 Public Information

All written information submitted to the District shall be available upon request to any person without restriction, according to sec. 19.35, Wis. Stats., unless:

1) The Permittee provides, at the time the Permittee submits the information, a written notice to the District that the Permittee claims that all or part of the information is exempt from disclosure according to sec. 19.36(5), Wis. Stats.; and
2) The Permittee demonstrates to the District's satisfaction that the information is a trade secret according to sec. 134.90(1)(c), Wis. Stats.

4.18 Right of Entry

The Permittee consents to inspection and sampling by the District according to the requirements and limitations set forth in sec. 11.804, MMSD Rules.

4.19 Administrative Review of District Decisions

The Permittee may seek administrative review of permit conditions and enforcement actions according to sec. 11.814, MMSD Rules. For purposes of judicial review, a District decision is not final until all of the available administrative review procedures have been exhausted.

4.20 Enforcement

1) The District may obtain any remedy allowed by law for any violation of any pretreatment standard or requirement. According to secs. 11.801 to 11.823, MMSD Rules, enforcement options include: a notice of noncompliance, a notice of violation, an order, publication of the Permittee's name in a public notice of users in

significant noncompliance, permit revocation, injunctive relief, civil penalties up to $25,000 per day per violation, and criminal prosecution. Further information is provided in the District's Enforcement Response Plan.

2) If any person willfully or negligently violates any pretreatment standard or requirement, knowingly makes a false statement, representation or certification, or knowingly falsifies, tampers with, or renders inaccurate any monitoring device or analytical method, then that person may be subject to prosecution under the criminal laws of the State of Wisconsin or the United States, in addition to actions for civil remedies.

3) If a Permittee's discharge results in a deposit, an obstruction, damage, or an impairment in the sewerage system, then the Permittee shall be liable to the District for the costs of cleaning, repairing, or replacing the affected components.

4) In any enforcement action against the Permittee, the District may recover the District's costs for sampling, analysis, other surveillance measures, and time devoted to the action by the District's legal counsel, engineering staff, administrative staff, or other personnel.

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