

**Harcros Chemicals Inc.**  
**Best Management Practices Industrial Wastewater Discharge Permit**

**SPECIAL CONDITIONS**

**Effective June 15, 2025 – June 14, 2028**

DRAFT

Harcros Chemicals Inc.  
SPECIAL CONDITIONS

1. PERMITTEE CLASSIFICATION ..... 3

2. BEST MANAGEMENT PRACTICES REPORTING REQUIREMENTS ..... 3

3. REPORTING DUE DATES ..... 5

4. SAMPLE LOCATION ..... 5

5. NOTIFICATION OF VIOLATIONS..... 5

6. WASTEWATER PRETREATMENT FACILITY ..... 6

7. PERMIT TERMS ACCEPTANCE CLAUSE..... 6

8. IMPLEMENTATION SCHEDULE..... 6

DRAFT

## SPECIAL CONDITIONS

### Discharge Limitations and Monitoring Requirements

During the period beginning **June 15, 2025** lasting through **June 14, 2028**, the following discharges are authorized:

### 1. PERMITTEE CLASSIFICATION

Harcros Chemicals is a Best Management Practice (BMP) industrial user as defined by the Portland Water District and must comply with the federal pretreatment standards found in 40 CFR part 403. The permittee shall not discharge any pollutant which exceeds the limits set forth by the applicable local pretreatment standard. The permittee shall not cause pass-through or interference with the publicly owned treatment works (POTW).

Harcros Chemicals is a chemical company that plans to package certain chemicals for distribution. The chemical products will be brought onsite via a chemical tanker and transferred to an onsite storage tank or directly into plastic drums or totes. Harcros Chemicals is categorized as a BMP industry because process discharge will be minimal. The pH of the process wastewater may need to be adjusted prior to discharge to the sewer to achieve a pH that meets the City of Westbrook's pH ordinance.

**This permit allows for packaging and distribution of bleach, caustic soda, and caustic potash.**

Shown below are the local ordinance limits for parameters that Harcros Chemicals is required to monitor for on a regular basis.

Monitoring Parameter	Daily Maximum Limit
pH Standard Units, S.U.	<5.0 prohibited  >12.5 prohibited
Caustic Alkalinity <i>Analysis required on grab samples with pH &gt; 10.3 S.U.</i>	1,000 mg/L

### 2. BEST MANAGEMENT PRACTICES REPORTING REQUIREMENTS

The permittee will provide the Portland Water District with results of the analysis of **pH** and **Caustic Alkalinity** (as needed, see table below) on each batch discharged to the sewer.

Parameter	Frequency of Monitoring	Sample Type
pH S.U.*	Each batch	Grab
Caustic Alkalinity*	As needed, see note below	From pH Grab Sample
*pH less than 5.0 standard units is prohibited; any wastewater discharged with a pH result over 10.3 standard units MUST be accompanied by a result for caustic (hydroxide) alkalinity from the same sample. pH above 12.5 standard units is prohibited (see EPA hazardous waste rules at 40 CFR 261.22)		

Harcros Chemicals must conduct pH measurements on each batch prior to discharge to ensure compliance with permit limits. The date, time, pH reading, and name or initials of the person taking the measurement must be documented.

The pH meter used for pH measurements must be calibrated within 4 hours of each pH reading. Calibration information (including date and time of calibration, operator name or initials, buffer true value, manufacturer, lot number and expiration date) must be documented for each calibration.

If wastewater with a pH >10.3 is discharged to the sewer, it must be analyzed for caustic alkalinity by a lab certified in the state of Maine.

#### Quarterly BMP Certification Reports

The permittee will provide the Portland Water District with a quarterly BMP report certifying that each batch of process wastewater is being tested and pH adjusted (if necessary) prior to discharge to the sewer. The BMP report must include the following certification statement:

*"I certify that Harcros Chemicals is implementing pH monitoring on each batch and pH adjustment (as needed) prior to discharge to the sewer."*

The following certification statement must be submitted with all monitoring reports and correspondence (see General Conditions, #8f):

*"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 fines and imprisonment for knowing violations."*

BMP Certification reports shall include, at a minimum:

- 1. A cover letter on company letterhead with authorized signature (see General Condition #9)**
- 2. Appropriate certification statements (see General Condition #8f and above)**
- 3. Batch discharge logs to include pH meter calibration records, initial and final pH measurements, and gallons of process wastewater discharged**

Copies of BMP reports and all records submitted must be kept by the permittee for a minimum of 3 years. Through an initiative to reduce paper storage, PWD encourages the submission of electronic (digital) reports to the email address [pretreatment@pwd.org](mailto:pretreatment@pwd.org), provided an original document could be obtained as necessary.

Certification statements must be signed by a responsible company official. The Portland Water District has a list of authorized representatives for Harcros Chemicals on file. Unsigned reports or those signed by an unauthorized representative will be rejected. See General Condition #8f and #9 for more information.

The monitoring requirements will be due according to the schedule specified in Special Conditions Section 3.

### 3. REPORTING DUE DATES

The permittee shall submit BMP reports quarterly for each year covered by the permit. The permit dates are June 15, 2025 to June 14, 2028:

#### BMP Certification Reports

**Covering period from:**

Facility startup – September 2025  
October – December 2025  
January – March 2026  
April – June 2026  
July – September 2026  
October – December 2026  
January – March 2027  
April – June 2027  
July – September 2027  
October – December 2027  
January – March 2028  
April – June 2028

**Report due by:**

Due October 15, 2025  
Due January 15, 2026  
Due April 15, 2026  
Due July 15, 2026  
Due October 15, 2026  
Due January 15, 2027  
Due April 15, 2027  
Due July 15, 2027  
Due October 15, 2027  
Due January 15, 2028  
Due April 15, 2028  
Due July 15, 2028

### 4. SAMPLE LOCATION

Harcros Chemicals plans to use totes to collect process wastewater. A sample must be collected from the tote for each batch prior to discharge.

### 5. NOTIFICATION OF VIOLATIONS

The permittee must notify PWD within 24 hours of becoming aware of an accidental spill or intentional release to the sewer system. The permittee shall follow notification guidelines in General Condition #11.

Contact information for notification of violations is as follows: by phone at (207) 761-8300 (24-hour access) or by email at [pretreatment@pwd.org](mailto:pretreatment@pwd.org). A voice message left at the above number or an email to the above email address will be considered adequate notification, as long as it is within 24 hours of industry awareness of the violation. Please follow up all voice mails with an email as well.

Any violations of this permit, including failure to report spills to the sewer system, may result in enforcement actions as outlined in the Portland Water District Industrial Pretreatment Program Enforcement Response Plan. A copy of the plan is available on PWD's website at [pwd.org/industrial-pretreatment-westbrook-gorham](http://pwd.org/industrial-pretreatment-westbrook-gorham).

## 6. WASTEWATER PRETREATMENT FACILITY

A. The permittee shall at all times maintain in good working order and operate at maximum efficiency all existing wastewater treatment and/or control facilities.

*Harcros Chemicals operates a portable wastewater collection and pH adjustment system. Wastes are mixed in the tank and manually neutralized as necessary prior to discharge.*

B. The permittee shall collect all waste flows and discharge them into its Wastewater Treatment Facility in such a manner as to maximize removal of pollutants, unless authorization to the contrary is obtained by the City Engineer or his/her authorized representative.

C. If accurate flow measurements of discharge are required, the permittee shall install flow-measuring facilities of a design approved by the City of Westbrook and the Portland Water District. Final plans and specifications must be submitted to the Portland Water District and approved prior to the construction of the facility.

*No new or additional flow-measuring equipment is required to be installed as of the date of this permit.*

D. If applicable, in order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

1. Provide an alternative power source sufficient to operate the waste control facilities; or, if such alternative power source is not in existence,
2. Halt, reduce, or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

## 7. PERMIT TERMS ACCEPTANCE CLAUSE

Harcros Chemicals shall be deemed to agree to all of the terms of this permit upon its acceptance of this permit.

## 8. IMPLEMENTATION SCHEDULE

If installation or substantial modification of pretreatment or other facilities are required by state or federal laws, or by the City of Westbrook and/or the Portland Water District, then an implementation schedule for compliance shall be developed.

*No such schedule is required as of the date of this permit.*