



IMPP Newsletter

Volume 1, Issue 4

July 2023

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Key Dates

Monthly Reports

15th-Self-Monitoring Reports Due
(Ex. September SMR due October 15th)

Semi-Annual Reports

June 1st – Period 1 Semi-Annual Report Due.

- Sampling Window is from November 1st –April 30th

December 1st – Period 2 Semi-Annual Report Due

- Sampling Window is from May 1st – November 30th.

Annual Reports

June 30th- Flowmeter Calibration Reports due.

City of Memphis IMPP

Largest Pretreatment Program in TN (based on number of Industries)

Largest Pretreatment Program in EPA Region 4 (AL, FL, GA, KY, MS, NC, SC, & TN)

18th Largest Pretreatment Program in the Nation (out of ~1,500)

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IMPP Staff

SPOTLIGHT

New Address

The Industrial Monitoring & Pretreatment Program has moved to the Environmental Complex Administration Building located on the southeast corner of Frayser Blvd. and W. Range Hills Drive. The facility address is [2865 Frayser Blvd., Memphis, TN 38127](https://www.memphiscity.gov/2865-Frayser-Blvd-Memphis-TN-38127).



Visiting the IMPP office

Directions:

Follow I-40 to N. Hollywood St. Take exit 5 from I-40. Turn north on N. Hollywood St. towards Frayser Blvd. Turn right on Frayser Blvd. 2865 Frayser Blvd. will be on the right.

Checking in:

Please check in at the security station.
You will be required to sign in and provide a valid government issued ID when visiting.

Hours of operation:

Monday – Friday,
7:00 AM – 3:30 PM (Closed on City observed holidays)

WASTE HAULERS

Attention Permitted Waste Haulers:

Construction and rehabilitation of the sewer interceptor at the M.C. Stiles Wastewater Treatment Plant is now complete. **On July 10, 2023, the hauled waste offload site moved back to the Stiles designated manhole. Offload hours are 8 AM – 2 PM, Monday thru Friday.** Hauled Waste will *not* be accepted at T.E. Maxson WWTP.

As a reminder, the City of Memphis will **ONLY** accept septage wastewater generated within Shelby County, TN limits. Septage waste includes portable toilet waste and septic tanks.

Prohibited hauled waste includes, but is not limited to:

- grease trap waste;
- carwash sump water;
- unpermitted and industrial wastewater;
- industrial wastewater that has not been pre-approved;
- any wastewater generated outside of Shelby County, TN limits; and
- any wastewater that comprises of anything other than septage waste.

Please seek appropriate alternative disposal means for the above listed prohibited wastewater.

Failure to comply with this prohibition may result in civil penalties up to \$10,000 per day per violation and suspension up to termination of dumping privileges.

Thank you for your cooperation and please call 901-636-4336 if you have any questions.

COMPLIANCE TIPS

- Ensure all reports are complete and submitted by due dates.
- Ensure all reports are signed by an Authorized Representative.
- Include the proper certification statement (i.e., "I certify under penalty of law...") with all submittals.
- Submit wet ink original reports in addition to any electronic submittals.
- Conduct sampling events at the beginning of each month if your IWDP includes monthly average limits.
- Calibrate pH meter(s) frequently.
- Ensure pH buffer solutions are not expired.
- Calibrate flow meter(s) frequently (at least annually)
- Ensure all detection limits for parameter compliance are \leq the permit limits.
- Conduct multiple semi-annual sampling events within each window to avoid status of Significant Noncompliance (SNC).

Q & A



1. What should you do if your sample analysis results have a below detection value that is higher than the IWDP limit?

Ans: Resample. If the below detection results are not low enough to prove compliance, then it is required to resample.

2. What EPA regulations apply to Metal Finishers?

Ans: 40 CFR 433 Metal Finishing Point Source Category Subpart A(433.10-433.17)

3. Who should Industrial Users contact in case of a slug discharge or process upset?

Ans: IWDP 4.5.8(a.)

- i. IMPP Manager at (901) 636-4336
- ii. MC Stiles Plant Operator at (901) 636-4300
- iii. TE Maxson Plant Operator at (901) 636-0301 or (901) 636-0312

4. What are the Pretreatment Program objectives?

Ans: (a) To prevent the introduction of pollutants into POTWs which will interfere with the operation of a POTW, including interference with its use or disposal of municipal sludge;

(b) To prevent the introduction of pollutants into POTWs which will pass through the treatment works or otherwise be incompatible with such works; and

(c) To improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges.

5. Where can you find the Wastewater Treatment Plants Local Limits?

Ans: The City of Memphis Sewer Use Ordinance 5793.

Please send any questions that you may have to Derrick Porter;
derrick.porter@memphistn.gov.