



December 29, 2022

Electronic Mail

Mr. Cole Musial
Manager Environmental Compliance and Health Safety
Kenton County Airport Board
PO Box 752000
Cincinnati, Ohio, OH 45275-2000

Re: *Industrial Wastewater Discharge Permit IND-00051*

Dear Mr. Musial:

Attached is Kenton County Airport Board's three-year Industrial Wastewater Discharge Permit that will take effect on January 1, 2023.

Sanitation District No. 1 (SD1) must be notified in advance of any changes to Kenton County Airport Board that would affect the conditions of this permit. The permit should be reviewed thoroughly for Kenton County Airport Board to always maintain compliance with applicable USEPA, Kentucky Energy and Environment Cabinet, and SD1 Rules & Regulations during the term of the permit. If Kenton County Airport Board wishes to appeal or challenge any conditions of this permit a written response must be received within 30 days of receipt of this permit.

A copy of the SD1 Rules and Regulations can be found on the SD1 website at www.sd1.org. If you have any questions regarding this permit, please contact the Industrial Pretreatment Department at industrial-monitoring@sd1.org.

Regards,



Britney Carson
Pretreatment Coordinator

Enclosure
Cc: Industrial Pretreatment Dept.

**SANITATION DISTRICT NO. 1
INDUSTRIAL WASTEWATER DISCHARGE PERMIT**

Permit #: **IND-00051**

Effective Date: **January 1, 2023**

Expiration Date: **January 1, 2026**

In accordance with all the terms and conditions of the Rules and Regulations of Sanitation District No. 1 (SD1) and any applicable provisions of federal and state regulations, permission is hereby granted to:

Kenton County Airport Board
77 Comair Blvd.
Hebron, KY 41048

to discharge wastewater to the sanitary sewer system at

Manhole # 2470234, 2361022, Airport Terminal & Tower Pump Stations

This permit is granted in accordance with the Industrial Wastewater Permit Questionnaire and in conformity with plans, specifications and other data submitted.



Director of Operations

Permit may be revised under any of the following conditions:

- a) Nature of sewer discharge changes.
- b) Transferred without approval.
- c) Federal, state or SD1 Rules & Regulations change.
- d) False information or data is provided or upon failure to adhere to any of the attached conditions or requirements.

1.0 Duties and Requirements

1.1 Significant Industrial User (SIU)

SD1 has deemed Kenton County Airport Board a Significant Industrial User. A Significant Industrial User is any industrial user that meets one or more of the following:

- a. Discharges an average of 25,000 gallons per day or more of process wastewater to the Publicly Owned Treatment Works (POTW) (excluding sanitary, non-contact cooling and boiler blow-down wastewater).
- b. Contributes a process waste stream which makes up 5% or more of the average dry weather hydraulic or organic capacity of the POTW.
- c. Is designated as such by SD1 as defined in 40 CFR 403.12(a) on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

1.2 Wastewater Discharge Standards

Discharges into SD1's sanitary sewer system are subject to the current SD1 Rules & Regulations and the Prohibited Discharge Standards of the General Pretreatment Regulations in 40 CFR Part 403.5. Including the Effluent Limitations in this permit.

Monitoring and periodic reporting of wastewater discharge flow is required. (Reference section 3.0 of this permit)

All records of monitoring activities and results shall be retained for a minimum of three years and such records shall be available for inspection and copying as required in 40 CFR 403.12(o).

SD1 reserves the right to revise the wastewater discharge permit to establish changes in limitation or requirements on wastewater discharges to the sanitary sewer system, if deemed necessary.

SD1 reserves the right to regulate all wastewater discharge rates as well as halt any wastewater discharge.

Where required by Federal Categorical Regulations, a Spill Prevention Control and Countermeasure Plan (SPCC) [SD1 Rules & Regulations Section 502(2)(B)(6)], a Toxic Organic Management Plan (TOMP) [SD1 Rules & Regulations Section 502(2)(B)(7)], or a Pollution Management Plan (PMP) [SD1 Rules & Regulations Section 502(2)(B)(8)] must be evaluated and updated as needed and submitted to SD1.

Should the wastewater discharge permit expire, the permit conditions shall remain in effect until a new permit is issued, unless SD1 has revoked the permit or determined the permit should be closed.

1.3 Wastewater Treatment System Surcharge

Wastewater discharges are subject to a Wastewater Treatment System Surcharge based on the discharge of sewage having a concentration greater than normal strength sewage, defined as follows:

Total suspended solids	300 mg/L
Biochemical oxygen demand	240 mg/L
Total Kjeldahl nitrogen	30 mg/L

Refer to SD1 Rules & Regulations section 502(2).

2.0 Enforcement/Penalties

2.1 Applicable Enforcement

If an industrial user is found to be violating any provisions of this permit or SD1 Rules & Regulations, they are subject to enforcement actions detailed in the SD1 Rules & Regulations Section 1000.

Each violation is subject to an administrative fine of up to \$1000 per day per violations and cost recovery. [Reference SD1 Rules & Regulations Section 1001(2)(A)].

SD1 will determine the appropriate enforcement action to be taken in each case, based on its consideration of factors relative to the violation, including, but not limited to, the type of violation, the intensity of the violation, whether the violation was intentional or unintentional, and the history of violations for a given establishment.

2.2 Applicable Civil Penalties, Criminal Penalties and Compliance Schedules

Violations of this permit are subject to civil penalties of up to \$1,000 per violation and criminal penalties of up to \$1,000 per violation or six months in prison or both. [Reference SD1 Rules & Regulations Section 1000]

Violations of this permit may result in the development of a compliance schedule not to extend beyond the compliance date indicated by the applicable Federal Pretreatment Regulation 40 CFR 403.12(b)(7).

3.0 Monitoring, Sampling, and Reporting Requirements

3.1 Monitoring Requirements

Wastewater discharge from Kenton County Airport Board facility are required to be sampled and analyzed **annually** (January – December) to identify the nature and concentration of pollutant parameters, in accordance with 40 CFR 403 Regulation. SD1, as the Control Authority, will perform this **annual** monitoring of the wastewater discharge for Kenton County Airport Board.

Total flow of the wastewater discharges from Kenton County Airport Board facility are required to be reported **monthly** to identify the volume and loading on the treatment plant, in accordance with 40 CFR 403 regulations. SD1, as the Control Authority, will report this **monthly** monitoring for the wastewater discharge for Kenton County Airport Board.

If there are any pretreatment bypasses from the glycol wastewater holding tanks in each calendar quarter period, the de-icing fluid concentration and volume must be recorded.

3.2 Sampling Location

The Kenton County Airport Board has four separate discharge points to SD1:

- 1) The Airport Terminal Pump Station (discharges to Dry Creek Wastewater Treatment Facility)
- 2) The Airport Tower Pump Station (discharges to Dry Creek Wastewater Treatment Facility)

In the event Kenton County Airport Board has any de-icing wastewater bypass discharges, samples shall be collected at each of the de-icing wastewater collection tank discharge points.

When applicable to the analytical method of the pollutant parameter, time composite sampling must be performed.

Due to most of the total effluent discharged from Kenton County Airport Board being discharged through these sampling locations, the parameters in the Dry Creek Wastewater Treatment Facility Effluent Limitations Table will be monitored at these locations.

3.3 Collection Procedure

Sample containers must be EPA approved according to 40 CFR Part 136.

3.3.1 Time Composite Sampling

Samples should be taken over the operating period to form a daily composite sample representative of the wastewater discharge as a whole. These samples must consist of a minimum of four grab samples, taken no less than

15 minutes apart and collected at consistent volume and time intervals. The grab samples from the operating period are to be combined to form a composite sample before analysis.

3.3.2 Grab Sampling

A grab sample is a sample taken at a specific time and must be representative of the wastewater discharge as a whole.

Grab samples must be taken when sampling for grease & oil, pH, phenols, temperature, cyanides, and hexavalent chromium.

3.4 Sample Preservation and Analyses [40 CFR 136]

Appropriate chemical and temperature preservation must be provided when samples are collected.

Composite samples must be kept iced during collection if ambient temperatures exceed 6°C and preserved at end of sample collection period.

Temperature preservation must be maintained as samples are transferred to the laboratory for analysis.

Sample holding times for each parameter must be observed.

Sample analysis must be by EPA approved procedures.

3.5 Reporting Requirements

3.5.1 Periodic Reports [40 CFR 403.12(h)]

Kenton County Airport Board has no self-monitoring requirements currently.

In the event self-monitoring requirements are imposed all data collected from any applicable locations indicated in Section 3.2 must be submitted to SD1 on the forms provided in Attachment A.

3.5.2 Additional Reports

No additional reports are required at this time.

3.5.3 Automatic Resampling

When self-monitoring analysis indicates a parameter limitation exceedance has occurred Kenton County Airport Board must:

1. Notify SD1 of the exceedance within 24-hours of becoming aware of the data; and
2. Repeat the sampling and pollutant analysis; and
3. Submit the results of the resampling data within 30 days of becoming aware of the initial exceedance using Attachment A.

In the event the resampling data incurs additional parameter limitation exceedances, these steps must be repeated until compliance is demonstrated.

(Reference Limitation Table(s) in this permit.)

Dry Creek Wastewater Treatment Plant Effluent Limitations Table

This facility shall not discharge wastewater in concentrations that exceed SD1's current Effluent Limitations for the following pollutant parameters:

Effluent Limitations for Monitoring Point Airport Terminal Pump Station & Airport Tower Drive Pump Station

Parameter	Daily Max	Sampling Frequency	Sample Type
Arsenic (mg/L)	2.21	Annual by SD1	COMP
Cadmium (mg/L)	0.12	Annual by SD1	COMP
Chromium (VI) (mg/L)	1.15	Annual by SD1	GRAB
Chromium, Total (mg/L)	6.00	Annual by SD1	COMP
Copper (mg/L)	3.06	Annual by SD1	COMP
Cyanide, Free (mg/L)	0.69	Annual by SD1	GRAB
Flow (mgd)	**	Monthly by SD1	Total
Lead (mg/L)	0.76	Annual by SD1	COMP
Mercury (mg/L)	0.0005	Annual by SD1	COMP
Nickel (mg/L)	4.55	Annual by SD1	COMP
Oil & Grease, hydrocarbon (mg/L)	50*	Annual by SD1	GRAB
pH (su)	6.0-10.0*	Annual by SD1	GRAB
Selenium (mg/L)	0.23	Annual by SD1	COMP
Silver (mg/L)	1.0	Annual by SD1	COMP
Temperature (C)	65*	Annual by SD1	GRAB
Zinc (mg/L)	3.50	Semi Annual by SD1	COMP

* Reference SD1 Rules & Regulations Section 501

** SD1 consumption is used.

4.0 Notification Requirements

4.1 Control Plans

Where required by federal categorical regulations, a Spill Prevention Control and Countermeasure Plan (SPCC) [SD1 Rules & Regulations Section 502(2)(B)(6)], a Toxic Organic Management Plan (TOMP) [SD1 Rules & Regulations Section 502(2)(B)(7)], and/or a Pollution Management Plan (PMP) [SD1 Rules & Regulations Section 502(2)(B)(8)] must be evaluated and updated as needed and submitted to SD1.

Kenton County Airport Board must notify SD1 immediately of any changes that occur at the facility affecting applicable control plans.

4.2 Notice of Spills or Accidental Discharges

Users shall notify SD1 **immediately**, by calling 859-547-1673, 24-hours a day, of any slug loading or any other discharges of wastes in violation of SD1's Rules & Regulations. The user shall identify the type of chemical, volume of spill, location, time and date of occurrence and the countermeasures taken to control the spill. This notification is required to enable countermeasures to be taken by SD1 to minimize damage to the POTW, collection system or receiving waters.

This notification shall be followed, within **five calendar days** of the occurrence, by a detailed written statement from the user describing the causes of the discharge and the measures being taken to prevent future occurrences.

4.3 Notice of Pretreatment Bypassing [SD1 Rules & Regulations Section 500]

4.3.1 Intentional Bypassing

An industrial user may allow a bypass, defined as the intentional diversion of waste streams from any portion of an industrial user's treatment facility, to occur only if it is for essential maintenance to ensure efficient operation and does not cause pretreatment standards or requirements to be violated.

All bypasses are subject to the provisions of the following:

- a. If an industrial user knows in advance of the need for an intentional bypass, the user shall submit prior notice to SD1, if possible, at least 10 days before the date of the bypass.

4.3.2 Unanticipated Bypass

An industrial user shall submit verbal notice of an unanticipated bypass to SD1 within 24 hours from the time the industrial user becomes aware of the bypass. A written submission shall also be provided within **five calendar days** of the time the industrial user becomes aware of the bypass. The written submission shall contain the information required in 40 CFR 403.17. SD1 may waive the

written report on a case-by-case basis if the verbal report has been received within 24 hours.

4.3.3 If the bypass discharge is prohibited, SD1 may take enforcement action against an industrial user for a bypass, unless:

- a. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; or
- b. There was no feasible alternative to the bypass; or
- c. The industrial user submitted notice as required above.

SD1 may approve an anticipated bypass, after considering its adverse effect and if SD1 determines that it will meet one of the three conditions above.

SD1 may take enforcement actions against the industrial user for any bypass of the pretreatment system.

4.4 Notice of Slug Loading [40 CFR 403.12(F)]

SD1 must be notified at least 48 hours in advance of all batch discharges.

SD1 shall be notified immediately by calling the 24-hour emergency number 859-547-1673 of all discharges and slug loadings that have the potential to disrupt operations at the POTW. Slug loading is defined as any pollutant, including oxygen-demanding pollutants such as BOD released within a discharge at a flow rate or pollutant concentration, which may cause interference with the POTW.

4.5 Notice of Changed Discharge

All industrial users shall notify SD1 in advance of any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the industrial user has submitted initial notification under 40 CFR 403.12(p).

4.6 Notice of Changed Operation

The user shall report to SD1 at least **90 days in advance** of any significant changes in operation, production or wastewater constituents and characteristics.

4.7 Notice of Reporting

All reports required by this permit shall be submitted via email to:
Industrial-monitoring@sd1.org

or mailed to:

*SD1
2999 Amsterdam Road
Villa Hills, Kentucky 41017
Attn: Industrial Pretreatment Department*

5.0 Special Conditions

5.1 Certification of Non-Discharge

Kenton County Airport Board has chosen to complete the Certification of Non-Discharge form and eliminate all discharges from central glycol pretreatment system to the sanitary sewer. The signed form is considered part of this permit.

To maintain non-discharging status, a Certification of Non-Discharge form must be signed and returned to SD1 annually.

If Kenton County Airport Board chooses to discharge from the central glycol pretreatment system a formal written notification and compliance data must be submitted for approval prior to the discharge. Discharges must comply with the parameters in the Dry Creek Wastewater Treatment Facility Effluent Limitations Table.

5.2 Glycol Pretreatment Bypassing

The airport must notify SD1 at least 24-hours in advance of any anticipated **Glycol Pretreatment Bypassing**, using the 24-hour phone number (859) 547-1673 and emailing industrial-monitoring@sd1.org. The expected volume of pretreatment bypass to be discharged and the duration of the bypass must be provided.

Sampling of the discharge must be performed to determine the concentration and flow of the bypass. Concentration and flow measurements must be reported to SD1 for surcharge determination.

Flow and concentration data of the de-icing wastewater discharge must be reported quarterly.

5.3 Fuels, Oils & Grease Interception Devices

All Kenton County Airport Board and the Kenton County Airport Board tenant fuels, oil & grease interception wastewater pretreatment system devices must be routinely inspected and maintained, as required to always ensure safety and compliance with SD1's Effluent Limits, such as oil & grease limits.

5.4 Fire Extinguishing Foam (AFFF)

The Kenton County Airport Board and the Kenton County Airport Board tenants must maintain their fire extinguishing systems to contain any releases from entering the sanitary sewer system. This would involve periodic inspection of the fire extinguishing system and sealing floor drains that may be affected such as the fire extinguishing foam storage areas or rooms.

Should there be a release of fire extinguishing foam that enters the sanitary sewer system, then SD1 must be notified immediately at (859) 547-1673 and emailing industrial-monitoring@sd1.org the stating the date, time, and estimated volume.

5.5 Fire Training Facility

SD1 must be contacted within 48-hours of any planned fire department fire training exercises, using the fire extinguishing foam. All fire extinguishing foam being used must be collected and treated with de-foamer to minimize the amount of foam entering the sanitary sewer system.

SD1 must be notified prior to discharging this wastewater the sanitary sewer system.

SD1
SELF-MONITORING REPORT
Attachment A



- 1) Date of Report:

 - 2) Facility Name:
Address:

 - 3) Sampling Location:

 - 4) Flow measurement: Report the average & maximum daily flow (in gallons) for each regulated process. If tanks are batch dumped, show the volume, frequency, and date of last discharge prior to sampling dates shown in item 5 below.

 - 5) Measurement of pollutants (attach the analytical results from your laboratory):

 - 6) Is the sample in compliance with the discharge limit?
- 7) 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.

Name/Title of Representative

Date

Signature