

INDUSTRIAL WASTEWATER DISCHARGE PERMIT

In accordance with the provisions of chapter NR 211 Wis.Adm.Code (Department of Natural Resources general pretreatment requirements), Federal pretreatment regulations 40 CFR 403, and Chapter 46 Article III Division 2 of the Municipal Code of Ordinances of the City of La Crosse (hereinafter, City Ordinance Chapter 46).

**City Brewing Company, LLC.
925 Third Street South
La Crosse, WI 54601**

Is hereby authorized to discharge industrial wastewater from the above identified facility into the La Crosse Wastewater Treatment System pursuant to the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under local, state, and federal laws; including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Non-compliance with any term or condition of this permit constitutes a violation of City Ordinance Chapter 46.

This permit is issued to the specific user identified above and shall not be reassigned, transferred, or sold to another user or to a different address.

The terms and conditions of this permit may be amended during the life of this permit, as limitations or requirements identified in City Ordinance Chapter 46 are modified or changed.

This permit shall become effective on the date of signature and shall expire at midnight,

September 26, 2019.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after the expiration date, the permittee shall file for reissuance of this permit in accordance with the requirements of the City Ordinance Chapter 46 at least 90 days prior to the expiration date.

La Crosse Wastewater Utility

By: _____
Bernard Lenz Utilities Manager

Dated This _____ Day Of _____, Year _____.

PART 1 - GENERAL PROHIBITED DISCHARGE STANDARDS

Section 1 - City of La Crosse Pretreatment Standards

No person shall discharge or deposit or allow to be discharged or deposited into the wastewater treatment system any wastewater which violates the prohibited discharge standards found in City Ordinance Chapter 46 Article III Division 2 46-109 (2) and briefly described as follows:

- A.Wastewater which has a closed cup flashpoint of less than 60 degrees Centigrade or 140 degrees Fahrenheit using test methods specified in 40 CFR 261.21.

- B. Solid or viscous wastes , or wastes that may become solid or viscous in the sewer, and may interfere with natural flow in a sewer or make excessive sewer cleaning necessary.....

- C. Garbage that has not been ground or reduced in size to such a degree that all particles are less than one-half inch (1/2") in any dimension

- D. Noxious or malodorous liquids, solids, or gases

- E. Waste which may cause corrosion or deterioration of the wastewater treatment system. All wastes discharged into the wastewater treatment system shall have a pH value in the range of six (6) to nine (9) Standard Units at the point of introduction into the wastewater treatment system.....

- F.Fat, wax, oil, or greases.....which may solidify or become viscous at temperatures between 0 and 65 degrees Celsius, or 32 and 149 degrees Fahrenheit.....

- G.Radioactive wastes or isotopes.....

- H. Substances not removable by the wastewater treatment process which will cause discoloration, opacity, or foaming of the wastewater treatment plant effluent or residues.

- I.In no case shall wastewater with a temperature exceeding 40 degrees Celsius or 104 degrees Fahrenheit be introduced into the wastewater.....

- J. Unpolluted water including, but not limited to, non-contact cooling water, rain water, river water, or groundwater which will increase the hydraulic loading on the wastewater treatment system

- K. Slug. loads causing interference with wastewater treatment system or adversely affectsresidues, sludges, or scum.

PART 1 - GENERAL PROHIBITED DISCHARGE STANDARDS CONTINUED

L. Wastewater discharges, except as authorized by the Board of Public Works, in mass discharge quantities or concentrations exceeding the following:

Pollutant Parameter	Limitation
Biochemical Oxygen Demand (BOD)	300 mg/L or 300 Lbs/Day
Chemical Oxygen Demand (COD)	500 mg/L or 500 Lbs/Day
Total Suspended Solids (TSS)	300 mg/L or 300 Lbs/Day
Fats, Waxes, Oil, & Grease (FOG)	100 mg/L

Note: These general standards are superseded by Part 3 and the Attachment

M. Wastewater containing toxic pollutants

N. Liquids, solids, or gases which may cause the wastewater treatment plant effluent or treatment residues, sludges, or scum to be unsuitable for reclamation or disposal or interfere with the reclamation or disposal process or processes ordinarily employed, including causing a reduction in the allowable land application rate or allowable land application site life by more than ten percent (10%).

O. Liquids, solids, or gases which are likely to cause the wastewater treatment plant to violate WPDES standards

P. Any trucked or hauled pollutant, except at discharge points designated by the POTW.

Q. Process wastewater containing pollutants exceeding the following concentrations as established on a continuous twenty-four (24) hour flow proportional basis or lesser period if process wastewater is discharged for less than twenty-four (24) hours in an average day of operation:

LIMITS

Pollutant Parameter	Max.mg/1
Arsenic	0.45
Cadmium	0.69
Chromium	2.77
Copper	2.07
Cyanide	0.66
Lead	0.60
Mercury	0.0002
Nickel	1.91
Zinc	2.61

R. Wastewater containing mass discharge quantities of a contaminant in excess of a permit limit

PART 1 - GENERAL PROHIBITED DISCHARGE STANDARDS

CONTINUED Section 2 - Other Conditions City Ordinance Chapter 46

In addition to the general prohibited discharge standards established in City Ordinance Chapter 46, no person shall discharge or cause to be discharged or deposited any wastewaters or effluent which does not conform to pretreatment standards established by the Environmental Protection Agency or the Wisconsin Department of Natural Resources. Pretreatment limits shall minimally include applicable national categorical pretreatment standards for new and existing sources set out in **40 CFR, subchapter n, PARTS 401 through 471 inclusive**. Wastewater, or effluent including domestic, commercial and industrial waste, shall not contain any substance which is in violation of any State, Federal, or Local pretreatment or other discharge standard.

Pollution Prevention

User shall annually review operations to see if there are alternative methods for cleaning, painting, machining, plating, etching, and etc., which would provide opportunity for waste reduction.

Section 3 - EPA Categorical Pretreatment Standards

The permittee identified on page 1 of this permit **does not** discharge any wastewaters, which are subject to regulation by EPA categorical pretreatment standards.

PART 2 - SPECIFIC APPLICABLE EFFLUENT LIMITATIONS

Section 1 - Pretreatment Plant Effluent, Bypass and Odor Control

A. Definition of Discharge Streams: The brewery has two (2) discharge streams.

1. **CBWPP Effluent** defined as the discharge of brewing process or related wastewater which has undergone the full mechanical and biological treatment processes employed by City Brewing Company Wastewater Pretreatment Plant.
2. **CBWPP Bypass** defined as the diversion of untreated or partially treated brewing process or related wastewater into the collection system of the City of La Crosse. Bypass is only from the metered bypass location.
3. **CBWPP Odor Control Side Stream** is not a discharge from the treatment plant but is a recycle side stream within the treatment plant.

PART 3 - MONITORING AND REPORTING REQUIREMENTS

Section 1 - Monitoring Requirements City Ordinance Chapter 46

A. Start Sampling: Beginning as of the date of signature of this permit and thereafter, the permittee shall self-monitor wastewater discharges subject to regulation under **PART 2** of this permit to ascertain compliance with the applicable limitations.

B. Sampling/Flow Requirements: The required self-monitoring shall consist both of sampling and flow monitoring of the regulated wastewaters for those pollutants as listed under **PART 2** of this permit and reporting of the results to the La Crosse Wastewater Utility. CBWPP effluent discharge and CBWPP bypass discharge shall be monitored concurrently on any day that a discharge occurs as described below.

C. Sample Locations:

CBWPP Effluent shall be sampled at the point of discharge into the city's collection system. The sampling point for the effluent shall be located after all biological and chemical processes/additions.

CBWPP Bypass shall be sampled at the point of discharge into the city's collection system. CBWPP influent sample may serve as the bypass sample if it is representative of bypass.

Total Sulfide shall be sampled from the city's collection system at a point downstream of the discharge from the CBWPP. This location shall be location # MSN-03591.

Gaseous Hydrogen Sulfide (H₂S) shall be sampled from the city's collection system at a point downstream of the discharge from the CBWPP (MSN-03591) using a gas monitoring device, and methodology, approved by the City of La Crosse Wastewater Utility Superintendent.

CBWPP Effluent

1. Sample Type: Sampling shall consist of a 24 hour, flow proportional composite sample. Grab samples shall be used for pH.

2. Sample Frequency: The monitoring shall be conducted in accordance with the following frequency:

Sampling and analyses for COD, TSS and pH shall be daily. Phosphorus and Zinc are to be sampled quarterly (i.e. 4 times per year)

Flow Measurement Requirements: Flow shall be recorded continuously and totalized daily.

**PART 3 - MONITORING AND REPORTING REQUIREMENTS
CONTINUED**

CBWPP Bypass

1. **Sample Type:** Sampling shall consist of a flow proportional composite sample. Grab samples shall be used for pH.
2. **Sample Frequency:** The monitoring shall be conducted in accordance with the following frequency: Sample and analyses for COD, TSS and pH shall be daily during the period of any bypass.
3. **Flow Measurement Requirements:** Flow shall be recorded continuously and totalized daily.

Total Sulfide

1. **Sample Type:** Grab
2. **Sample Frequency:** The monitoring shall be conducted in accordance with the following frequency:

Analysis for Total Sulfides shall be done once per week during a period of usual or normal operation.

Gaseous Hydrogen Sulfide

1. **Sample Type:** Grab
2. **Sample Frequency:** The monitoring shall be conducted in accordance with the following frequency:

Monitoring for atmospheric H₂S shall be done one (1) day per week during a period of usual or normal brewing operation.

D. Equipment: All equipment used for sampling, testing, and flow volume measurement shall be cleaned, maintained and calibrated according to the equipment manufacturer's recommended frequency and specifications. Flow meters shall be calibrated and documented by a recognized professional at least once each year.

E. Analysis & Results: The preservation and analysis of samples shall be performed in accordance with **40 CFR, Part 136** and amendment thereto, or other such methods approved by the EPA. Results from analysis of metals shall be reported in mg/l to a minimum of three significant places to the right of the decimal point, mercury in mg/l, four places to the right of the decimal point.

Acceptable examples = .001, 1.101, 10.111 or reported as less than the appropriate "EPA" detection limit and list the limit of detection. Non-acceptable examples = 0.1, 1.01, NA (none detected)

PART 3 - MONITORING AND REPORTING REQUIREMENTS CONTINUED

Section 2 - General Reporting Requirements Municipal Code of Ordinances Chapter 46 Article III Div.2 Sec.46-111

- A. Report Due Date:** Daily self-monitoring results shall be summarized and reported to the City of La Crosse Wastewater Facility on a weekly basis. During periods of CBWPP upset or other extraordinary occurrences, more frequent reporting may be required. Phosphorus and zinc sample results shall be reported within 15 days of receiving the results from the lab.
- B. Report Form:** The brewery shall use a report form which is approved by the City of La Crosse Pretreatment section.
- C. Data Reporting Requirements:** All monitoring results of all effluent samples taken and analyzed shall be submitted and reported with required self-monitoring reports. Samples taken strictly for process control are exempt. Samples taken of a waste stream solely for the purpose of obtaining information about pollutant content shall be included.
- D. Special Conditions:** If this industry has chemical, mixing, storage, dilution, or rinse tanks, etc. which are periodically dumped, a logbook showing at a minimum: date, time (start-finish), quantity and pH of the dump, shall be maintained for pretreatment inspection purposes.
- E. Slug Control Plan:** City Brewing is required to have a current slug control plan on file. A copy shall also be submitted for review to the City of La Crosse, WWU Pretreatment Section.
- F. Report Signature:** All monitoring reports shall be signed and validated by a principal executive officer or designee (see signatory requirements in PART 4, Section 13 of this permit).
- G. Solvent Management Plan:** A specific solvent management plan is not required.

PART 3 - MONITORING AND REPORTING REQUIREMENTS

CONTINUED Section 3 - Other Reports

A. Non-compliance

If, **Industry self-monitoring or City compliance monitoring** (sampling done by the city) reveals a violation of any discharge limitations specified herein, the industry shall;

1. Report said violation to the City of La Crosse POTW within 24 hours of becoming aware of the violation.

The industry shall repeat the sampling (within 21 days) until two (2) consecutive samples show that the non-compliance has been corrected.

2. The City POTW will notify permittee of any compliance sampling violations.
3. Additionally, a written report indicating the results of any required repeat sampling episodes and analysis shall be submitted within 30 days of becoming aware of the initial violation. Additional monitoring episodes due to non-compliance will not be counted in fulfilling the obligation of required sampling.

B. Accidental Discharge Municipal Ordinance Chapter 46 Article III Div.2 Sec.46-112

If for any reason the permittee discharges prohibited substances caused by spills, slugs, accidental discharges, or ANY CBWPP BYPASSES, the permittee shall;

1. Immediately notify personnel at the La Crosse Wastewater Treatment Plant at (608) 789-7330 or the Superintendent's cell phone (608) 780-3554
2. The permittee shall identify the time of discharge,
 - a. The type of substance, the quantity,
 - b. The corrective action being taken,
 - c. And the phone number of the person in charge of the remedial action
3. A written report shall be mailed or emailed to the superintendent within five (5) days of the occurrence, detailing the following spill information;
 - a. The cause of spill,
 - b. The makeup of the discharge,
 - c. The permittee's remedial efforts taken,
 - d. What measures will be taken to insure the spill, slug or accidental discharge will not be repeated in the future.**

C. Facility Changes:

The permittee shall immediately notify the La Crosse Wastewater Facility of: 1) any substantial change in the volume or character of the pollutants in the discharge, 2) any discharge that could cause problems at the Utility's wastewater treatment plant, or 3) any change at the facility affecting the potential for a slug discharge and the need for a slug control plan as required by s. NR 211.235 (4)(a).

PART 4 - GENERAL CONDITIONS

In addition to compliance with **PARTS 1, 2, and 3**, this permit is issued conditioned upon compliance with the following general conditions.

Section 1 - Fees - Current charges as approved by the La Crosse Common Council or City Ordinance Chapter 46 Article III Civ.2, Sec. 46-110 (g)

The permittee shall pay annual fees based on the following:

- A. Annual Administrative:** Unit Cost x Fee Units
- B. Monitoring Charge:** Personnel and equipment charges for scheduled City compliance monitoring are included in the administrative costs.
- C. Laboratory Analysis Charges:** Analysis charges for samples collected for compliance monitoring will be billed to the industry for the constituents analyzed by the contract laboratory.
- D. Extraordinary Charges:** Any extraordinary charges incurred as a result of non-compliance will be billed separately to the industry.
- E. Billing Routine:** Billing for annual fees will be in the month of May.

Section 2 - Admission to Property - City Ordinance Chapter 46 Article III Div.2. Sec. 46-116

Whenever it shall be necessary for the purposes of this permit, the board, or its duly appointed representatives, upon presentation of credentials, may enter upon any property or premises of the permittee at reasonable times, either scheduled or unscheduled.

Section 3 - Modification or Revision - City Ordinance Chapter 46 Article III Div.2 Sec.46-116

The terms and conditions of this permit are subject to change during the life of the permit as provided in City Ordinance Chapter 46 Article III, Sec. 46-110 (d) (1) .

Section 4 - Severability or Conflict - City Ordinance Chapter1 Sec. 1 The provisions of this permit are severable. If any provision of this permit or the application of any provision of this permit to any circumstances held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected.

PART 4 - GENERAL CONDITIONS CONTINUED

Section 5 - Notice of Intent - City Ordinance Chapter 46 Article III, Div.2 Sec. 46-110 (d)

The permittee shall apply for permit modification prior to the introduction of any changed wastewater into the La Crosse Wastewater Treatment System. In addition according to **40 CFR 403.12 (j)** the permittee shall promptly notify the POTW 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 permittee has submitted initial notification under **40 CFR 403.12 (p)**.

Section 6 - Enforcement, Appeal & Penalties - City Ordinance Chapter . 46 Article III Division 2 Sec. 46-108

Any permittee who has violated or is in violation of a City discharge permit, or who willfully or negligently fails to comply with any provisions of a City discharge permit, or who knowingly makes any false statement, representation or certification, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method, shall be subject to the enforcement provisions of City Ordinance Chapter 46 Division 2, Sec. 46-108 including termination, fines and/or civil penalties.

Section 7 - Disposal of Pretreatment Sludges or Other Residues

The disposal of sludges or residues generated through pretreatment or operation shall be in accordance with section 405 of the Clean Water Act and subtitles c and d of the Resource Conservation and Recovery Act (RCRA).

Section 8 - Confidentiality - City Ordinance Chapter 46 Article III Division 2 Sec. 46-115

Except for information determined to be confidential in City ordinance Chapter 46, all reports required by this permit shall be available through public records request process.

Section 9 - Records Retention - City Ordinance Chapter 46 Article III Division 2 sec. 46-111

The permittee shall retain and preserve for no less than seven (7) years any records, books, documents, memoranda, reports, correspondence, and any and all summaries thereof, relating to monitoring, sampling, and chemical analysis made by or on behalf of a permittee in connection with the permittee's discharge. In addition, the permittee shall adhere to all other stipulations made under City ordinance chapter 46 Article III Division 2 sec. 46-111

PART 4 - GENERAL CONDITIONS CONTINUED

Section 10 - Dilution - City Ordinance Chapter 46 Article III Division 2 sec. 46-112 (f)

The permittee shall not increase the use of potable or process water in any way, nor mix separate waste streams for the purpose of diluting a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the standards set forth in this permit.

Section 11 - Bypass 40 CFR 403.17

The permittee shall not intentionally divert any wastestream from any portion of the permittee's pretreatment facility. There are certain conditions where a bypass may be unavoidable; these conditions are set forth in **40 CFR 403.17**. The control authority may approve an anticipated bypass after considering its adverse effects.

Section 12 - Discharge of Hazardous Waste 40 cfr 403.12 (p)

The permittee shall notify the POTW, the EPA regional waste management division director, and state hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed would be a hazardous waste under **40 CFR Part 261**. The notification shall be in accordance with **40 CFR 403.12 (p)**.

Section 13 - Signatory Requirements

All reports required by this permit shall be signed by a responsible corporate officer of the permittee or designee as outlined in NR 211.15. and amendments thereto. Written authorization for the designee (position or individual) shall be properly signed and on file at the La Crosse Wastewater Treatment Facility, Industrial Pretreatment Section, prior to or simultaneous with submission of the required reports. All required reports shall include the following certifications.

PART 4 - GENERAL CONDITIONS CONTINUED

Section 14 - Total Toxic Organic Certification

Not Required

REPORT CONTENT CERTIFICATION

I further 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.

BY..

TITLE

DATED

Reporting Address

All reports should be made to:

La Crosse Wastewater Utility Industrial
Pretreatment Section
905 Joseph Houska Drive
La Crosse, WI 54601
Telephone No. (608) 789-7330

PART 5 - SPECIAL CONDITIONS

A. High Strength Surcharge: The La Crosse Wastewater Utility will bill City Brewing for wastewaters which exceed 250 mg/l BOD and 350 mg/l TSS and 10.0 mg/l Total Phosphorus at current rates as approved by the La Crosse Common Council. The Wastewater Utility has determined a method to average flow and strength from the various discharge locations to determine the appropriate quarterly charge using submitted pretreatment data. If City Brewing intends to shut down or operate their pretreatment plant at a reduced capacity, the City of La Crosse shall be notified not less than 30 days in advance. City Brewing shall submit a written request for a temporary variance to the maximum daily discharge limits for COD and Suspended Solids, along with a schedule for the shutdown or diminished capacity period. The City of La Crosse may require special procedures and limitations during any shut-down.

Special Reporting

The permittee shall immediately notify the La Crosse Wastewater Utility of any significant change in the quantity or quality of their discharge.

Sulfide Reduction Requirements

City Brewing shall provide chemical addition to improve sulfide reduction. The effectiveness cannot be predicted. If these facilities cannot consistently meet the permit limits for Total Sulfides and gaseous H₂S, City Brewing Company shall continue to investigate options to improve the reduction of total sulfides and hydrogen sulfide from the effluent of brewery's treatment plant. The City will track the brewery's progress in this mission as part of regular brewery/city meetings.

Attachment

SPECIFIC APPLICABLE EFFLUENT LIMITATIONS

1. A review of the City Brewing Company Wastewater Treatment Plant operating data, as well as past empirical experience, shows that the City Brewing Company is not able to consistently comply with the standards established in Section 46 the Municipal Code of Ordinances of the City of La Crosse. The following special limitations shall apply:
 - A. The City Brewing Wastewater Pretreatment Plant shall be well maintained, adequately staffed, and operated at all times when process wastewater discharge occurs to include weekends and holidays.
 - B. The production staff shall coordinate discharge activities with the City Brewery Wastewater Pretreatment Plant staff in order to minimize the potential for process discharges deleterious to or capable of causing upset to the City Brewery Co., and/or the city of La Crosse collection system or WWTF.
 - C. To facilitate rapid process control, chemical oxygen demand analysis shall be performed in lieu of the biochemical oxygen demand analysis.
 - D. All process wastewater from the City Brewery Company shall be directed to the City Brewery Wastewater Pretreatment Plant (CBWPP) located at Front and Market streets.

2. Discharge Limitations

- A. Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) shall not exceed of **8,500 pounds per day. This includes any bypass that occurs during operation.**

Pollutant Parameter	Limits
Chemical Oxygen Demand	8,500 Pounds/Day Monthly Average
Total Suspended Solids	8,500 Pounds/Day Monthly Average
pH	6-11 Standard Units
Zinc.	2.61 mg/1, Daily Maximum
Total Phosphorus	25.0 mg/1 , Daily Maximum

Hydrogen Sulfide and Total Sulfide Limits		
Parameter	Daily Maximum	Monthly Average
Hydrogen Sulfide (gas phase)	50.0 mg/1	20.0 mg/1
Total Sulfide	20.0 mg/1	10.0 mg/1

3. Miscellaneous Permit Details and Limits

A. City Brewing LLC. has continued to increase production. Currently, they cannot achieve the limits set forth in the previous permit. At this time they are working on optimizing their wastewater treatment capabilities. This in part, includes increased bioreactor efficiencies and increasing equalization capacity. City Brewing is a large contributor to plant loading. The City of La Crosse will take into account current and future loadings as part of the long range facility plans and upgrades.

B. We are currently reviewing various methodologies for analysis of H₂S coming from The City Brewing's waste stream. We will be working with The City Brewery to develop a more accurate evaluation of that process. The current method appears to underestimate the level of H₂S in the waste stream. The location for sampling will be MSN-03591, the first manhole south of the existing sampling location. See attached map.

C. Analysis for Total Sulfide will be performed as per Standard Methods 4500-S- D or 4500-S- E. Grab sampling will occur at same location as the H₂S sample, MSN - 03591. All QA/QC including noting for interferences will be included in analysis.

D. The City of La Crosse may require that discharge from The City Brewing be temporarily halted or diverted if necessary for repair, maintenance, or inspection of the Mississippi Street vault, related sewers, or the City of La Crosse Wastewater Facilities. If City Brewing requests that a required shut-down be done on a weekend, City Brewing will reimburse the City of La Crosse for overtime costs for labor.

E. The City of La Crosse reserves the right to revise the limits for Total Sulfide and gaseous Hydrogen Sulfide or change Total Sulfide limit to a Dissolved Sulfide limitation by providing documentation that a change is necessary to comply with effluent limits or prevent damage. A minimum of a ninety (90) day notice shall be provided to allow City Brewing to make modifications or adjustments.

F. High Strength Surcharge: The La Crosse Wastewater Utility will bill City Brewing for wastewaters which exceed 250 mg/l BOD and 350 mg/l TSS and 10.0 mg/l Total Phosphorus at current rates as approved by the La Crosse Common Council. The Wastewater Utility has determined a method to average flow and strength from the various discharge locations to determine the appropriate quarterly charge using submitted pretreatment data.