Industrial User Identification and Classification
Industrial User Identification
[40 CFR § 403.8(f)(2)(i)]

- Identify and locate all possible Industrial Users which might be subject to your POTW’s Pretreatment Program.
Industrial User
[40 CFR § 403.3(h)]

- A source of indirect discharge.
Indirect Discharge
[40 CFR § 403.3(g)]

- The introduction of pollutants into a POTW from any non-domestic source regulated under section 307(b), (c), or (d) of the Act.
Significant Industrial User
[40 CFR § 403.3(t)]

- Subject to Federal categorical standards
- Discharges 25,000 GPD or more of process wastewater
- Contributes 5% or more of hydraulic or organic capacity of the POTW treatment plant
- Has a reasonable potential for adversely affecting the POTW or for violating any standard or requirements
Where to Start...

- Water billing records
- Applications for sewer service
- Local business directories
- Wastewater collection personnel
- POTW treatment plant operator(s)
- Telephone directories
- Property tax records/business license records
- Chamber of commerce records
- Internet
- Drive around
What to Search For...

- High water use
- Standard Industrial Classification (SIC) and/or NAICS codes that may be of concern
- Compare to IUs listed in 40 CFR Parts 405-471
- Types of business that may have an impact on POTW
Initial Industrial Waste Survey

- Basic facility information
- General business operations
- Water use
- Sewer service
- Wastewater discharge flow and nature
- Pretreatment
Suggestions

- Notify indirectly affected persons prior to sending out surveys
- Provide a cover letter with the survey
- SEND SURVEYS CERTIFIED/RETURN RECEIPT REQUESTED
Track Surveys

- Returned surveys - eliminate those that:
  - are not industrial users
  - appear to have little to no impact
  - currently do not discharge to the POTW
Those eliminated should be notified of such

Keep those that *may* meet criteria of an SIU

Perform site visits to clarify determinations
40 CFR § 403.8(f)(2)(iii)

- Notify Industrial Users of applicable pretreatment standards and requirements
Categorical Determinations

- Production processes/products
- Raw materials
- Production volume
- Determine applicable category
- Determine applicable subcategory
- Contact Approval Authority for assistance
What Next?

- If CIU, commence permitting process (including federal reporting requirements).
- If definitely an SIU, commence permitting process.
- If potentially an SIU, perform additional monitoring and evaluation prior to making final determination.
Identify Waste Haulers

- Business license records
- Telephone directory
- Inspection of IUs that have wastes hauled offsite
- Observations in the field
SIU Master List Update

- Update regularly
- Submit annually
- Burden on IUs to notify (should be in SUO)
- Proactive approach
  - plumbing, building and/or occupancy permits
  - water billing records
  - local business journals
  - field observations
  - sewer connection applications
  - “utility connect questionnaires”
Summary

- POTW’s responsibility to seek out all possible IUs subject to pretreatment program.

- Ideally, survey all IUs initially then institute a “maintenance plan”.

- Non-SIUUs do not require permits.
Problem 1

- **B-Griffin Steel Corporation**
  - manufacturer of steel pipe
  - 40 CFR Part 464, Metal Molding and Casting
  - reporting during initial survey that they operate under a “non-discharge permit”
  - no sewer service in their area
Problem 2

- User reporting the discharge of only domestic and non-contact cooling water at 50,000 GPD day.
Initial survey:

- metal finisher
- 40 CFR Part 433
- uses 10,000 GPD
- states no waste hauled off
- states no environmental permits held
- states no process discharge to the sewer