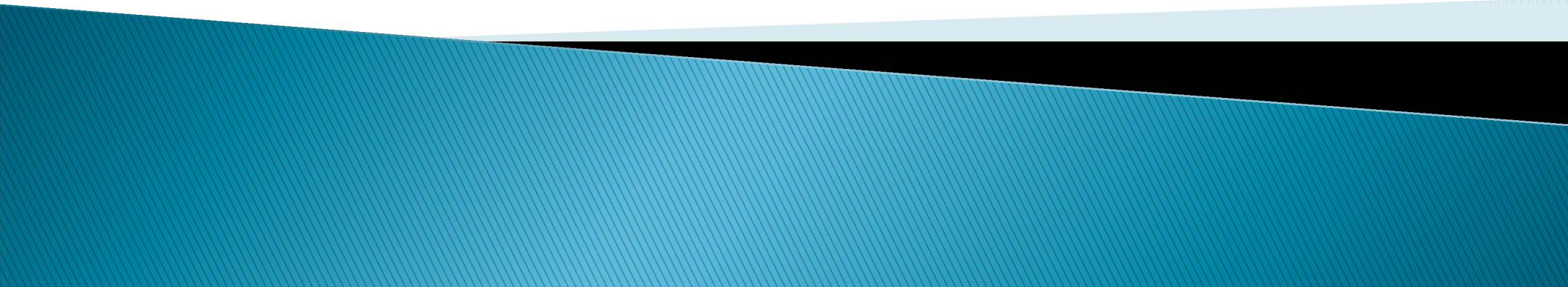


# **Industrial User Identification and Classification**



# 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)]

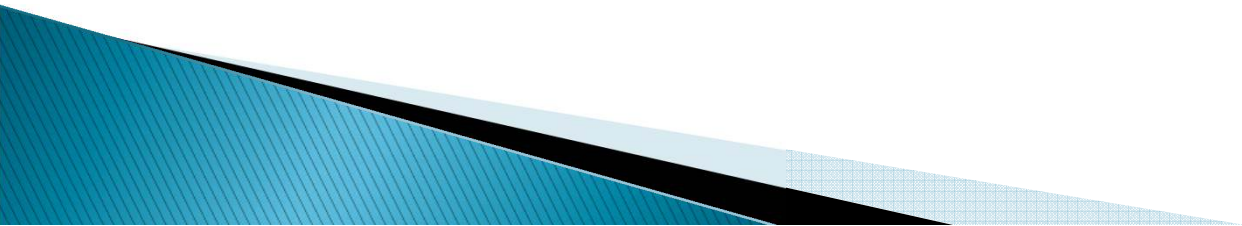
- ▶ A source of indirect discharge.



# 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
- 

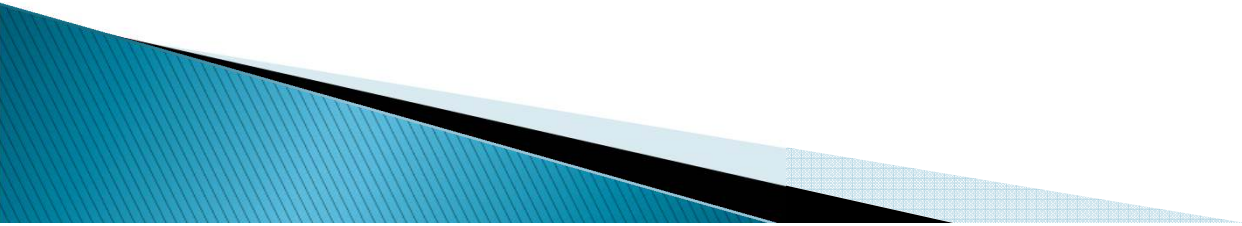
# Where to Start...

- ▶
- ▶
- ▶
- ▶
- ▶
- ▶
- ▶
- ▶



# 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

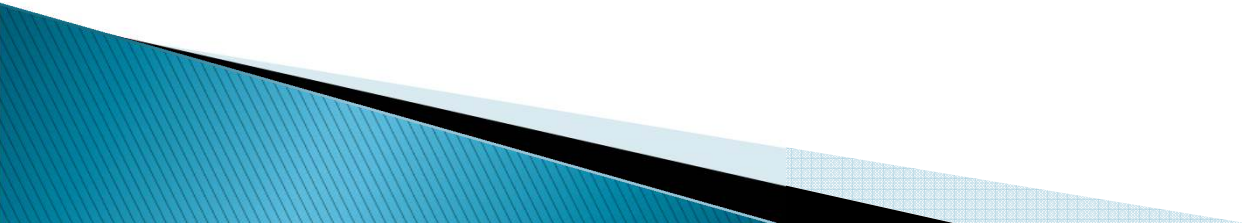
- ▶ Basic facility information
- ▶ General business operations
- ▶ Water use
- ▶ Sewer service
- ▶ Wastewater discharge flow and nature
- ▶ Pretreatment





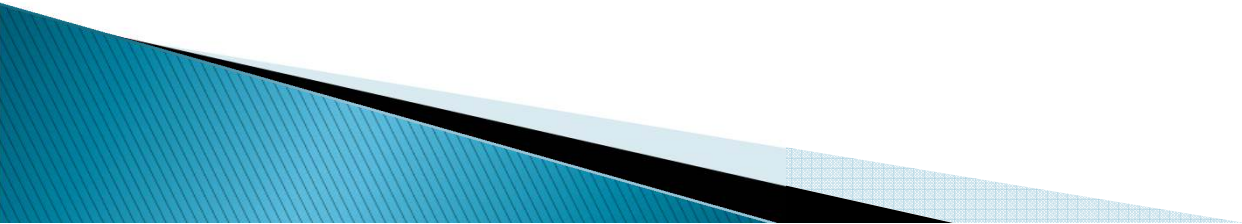
# Suggestions

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



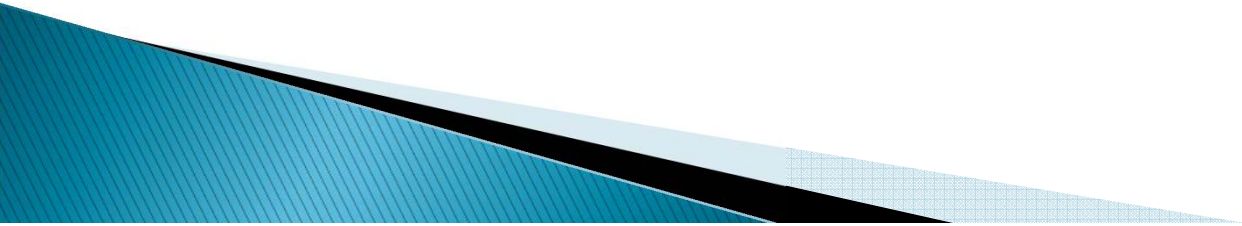
# Track Surveys

- ▶ Returned surveys - eliminate those that:
  - are not industrial users
  - appear to have little to no impact
  - currently do not discharge to the POTW



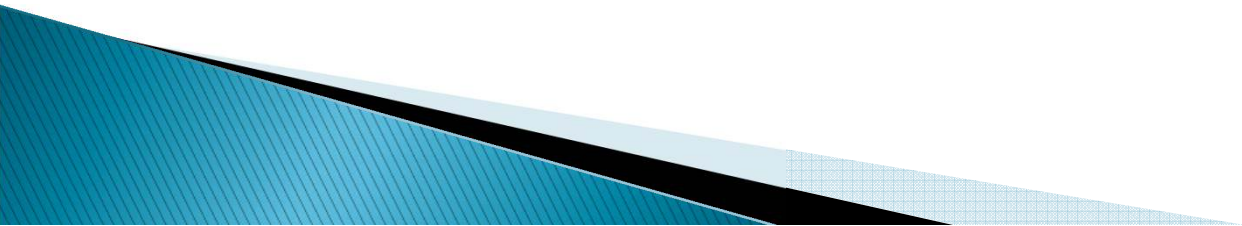
# Track Surveys, cont.

- ▶ Those eliminated should be notified of such
- ▶ Keep those that may meet criteria of an SIU
- ▶ Perform site visits to clarify determinations



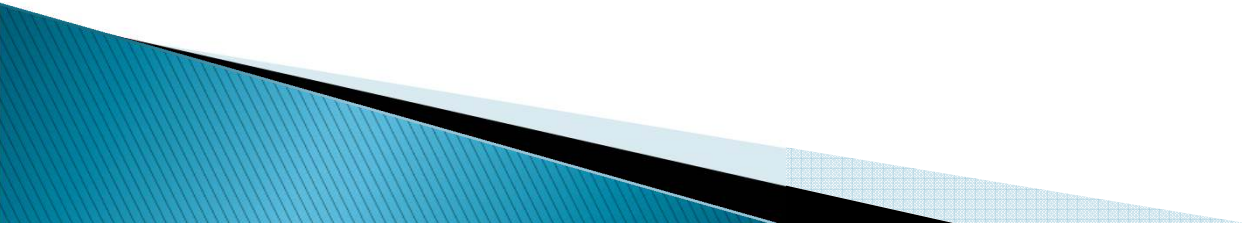
# 40 CFR § 403.8(f)(2)(iii)

- ▶ Notify Industrial Users of applicable pretreatment standards and requirements



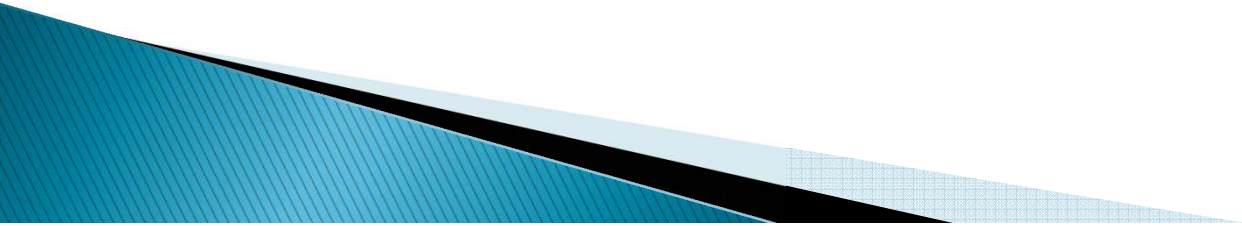
# Categorical Determinations

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



# What Next?

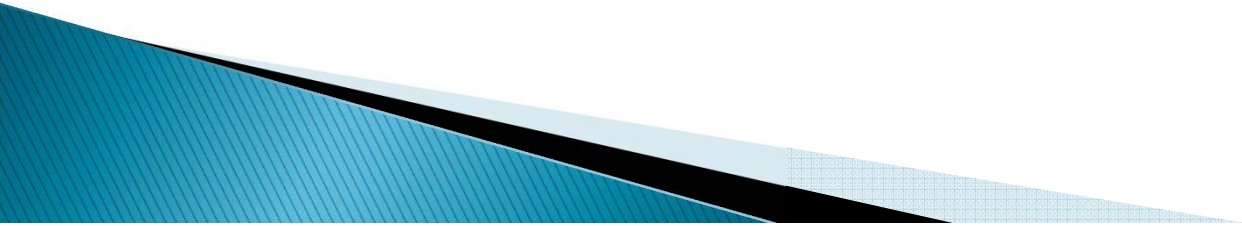
- ▶ If CIU, commence permitting process (including federal reporting requirements).
- ▶ If definitely an SIU, commence permitting process.
- ▶ If potentially an SIU, perform additional monitoring and evaluation prior to making final determination.






# 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”
- 

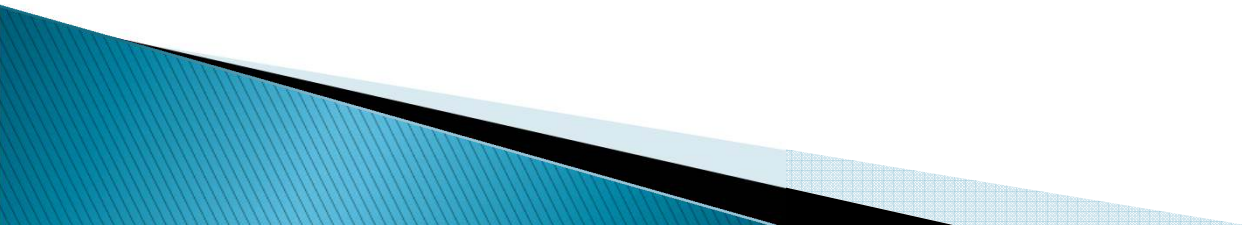
# Summary

- ▶ POTW's responsibility to seek out all possible IUs subject to pretreatment program.
  - ▶ Ideally, survey all IUs initially then institute a “maintenance plan”.
  - ▶ Non-SIUs do not require permits.
- 

# Problem 1

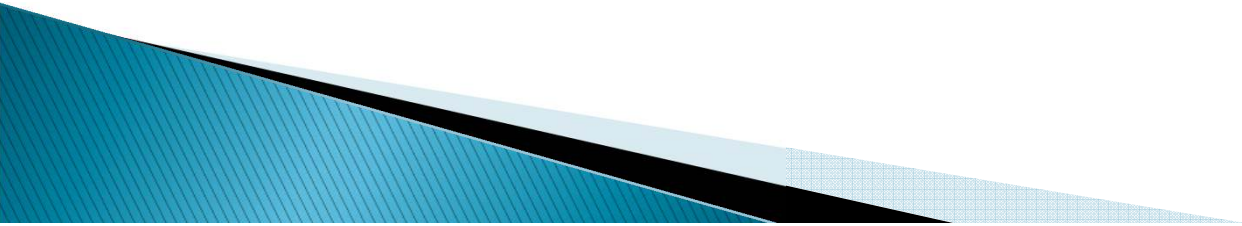
## ▶ **B-Griffin Steel Corporation**

- 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.



# Problem 3

## 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
- 