Industrial User Survey

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Outline

1. Regulatory Background & Purpose
2. Development of the IU Inventory
3. Characterizing Industrial Users
4. Notifying Industrial Users
5. Maintenance of the IU inventory
Regulatory Background

- **Purpose and Applicability: 40 CFR 403.1**
  
  “...establishes responsibilities of...local government, industry, and the public to implement National Pretreatment Standards to control pollutants which pass through or interfere with treatment processes in POTWs”

- This regulation applies: “to pollutants from non-domestic sources covered by Pretreatment Standards which are indirectly discharged into... POTWs...”
Federal Requirements

- 40 CFR 403.8(f)(2)(i-iii)
  
  i. Identify and locate all possible IUs
  
  ii. Identify the character and volume of pollutants
  
  iii. Notification of IUs of applicable Pretreatment Standards
Industrial User Inventory

403.8(f)(6)

- The POTW shall prepare and maintain a list of its Industrial Users meeting the criteria in §403.3(v)(1).

- The list shall identify the criteria in §403.3(v)(1) applicable to each Industrial User and, where applicable, shall also indicate whether the POTW has made a determination pursuant to §403.3(v)(2) that such Industrial User should not be considered a Significant Industrial User.
Objective of the IU Inventory

- Identify all IUs that have the potential to:
  - Cause Interference
  - Cause Pass-through
  - Cause Sludge Contamination
  - Have an impact on the POTW/Collection System and the workers at these systems
IU Inventory

“Surveying the Service Area”

- When to conduct the survey
  - Pretreatment program development
  - Continual survey of service area
  - NPDES permit requirements
  - Promulgation of new federal requirements
  - Upon noticing an uptrend in pollutant loadings
  - After plant violations or upsets
  - Collection system problems
IU Inventory
Methods and Tools

Drive-bys
IWS evaluation
Facility inspections
Industrial Waste Survey
Local telephone directories
Local newspaper
Business journal
Wastewater/water billing records

Sewer permit tap records
Business license records
Property tax records
SARA Title III/EPCRA Toxic Release Inventory
LEPC
Envirofacts –
www.epa.gov/enviro/index.html
IU Inventory

Methods and Tools (cont.)

- Coordination with other local departments

- Local/County departments
  - Building/Engineering
  - Community Development
  - Fire/Police
  - Code Enforcement

- Outreach, education, training
IU Inventory
How to Establish a List of All Nondomestic Users

- Users with high water usage
- Standard industrial classification (SIC) codes
- North America Industry Classification System (NAICS) codes
- Compare industrial categories at 40 CFR Part 405-471
- IUUs that might impact the POTW
Method for Collecting More Information on IUs

- Requesting additional information
  - Short survey form (1 page form)
    - Name of facility, address, contact information
    - Description of processes on site
    - Volume of waste used for domestic and nondomestic purposes
  - Long survey form
    - More comprehensive questionnaire
    - Discharge permit application
Examples of a Short Survey

http://www.ci.sumner.wa.us/Documents/Forms/WWTP_D_Pre-Form.pdf

<table>
<thead>
<tr>
<th>Permit Number: WWTP</th>
<th>BUS #</th>
</tr>
</thead>
</table>

### ‘D’ Industrial User Pre-Form

#### SECTION A - GENERAL INFORMATION (Required for all customers)

1. **Company Name of Tenant**
   - (Tax owner of building)

2. **Telephone #**

3. **Mailing Address**

4. **Facility Address**

5. **Parcel #**

6. **Email**

7. **FAX**

8. Does this business prepare and or serve food?  
   - Yes  
   - No

9. Does this business discharge chemicals, heavy metals, or organic waste excluding domestic use (sinks and toilets)?  
   - Yes  
   - No

10. Does this business use chemicals that have the potential to enter the sewer system?  
    - Yes  
    - No

11. Brief description of the type of business conducted at this site?

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I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.

**Signature of Authorized Representative**

**Print Name**

**Date**

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**DISCLOSURE:** Title 40 of the Code of Federal Regulations Part 403 Section 403.14 requires information provided in this questionnaire identifying the nature and frequency of discharge to be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR part 2 and applicable State Law. Should a discharge permit be required for your facility, the information in this questionnaire may be used to issue the permit.

**INTERNAL USE: Form Sent on**

**Received on**

**Form control #**
1. Company Name
Mailing Address
Telephone  ________________ Fax  ________________ E-Mail __________________

2. Production or facility information (if different than above)
Address
Telephone  ________________ Fax  ________________ E-Mail __________________

3. Name, title, and telephone number of personal authorized to represent this company in official dealings with the Industrial Pretreatment Control Authority
Name/Title  ____________________ Telephone  ________________
Name/Title  ____________________ Telephone  ________________
Name/Title  ____________________ Telephone  ________________

4. Identify type of business or services conducted
________________________________________________________________________

5. Describe this company's manufacturing processes (if any)
________________________________________________________________________

6. List Standard Industrial Classification (SIC) Codes for the facility
________________________________________________________________________

7. List number of employees and shift starting times for the facility
   # of employees  Starting time
   1st Shift  ________________ AM/PM
   2nd Shift  ________________ AM/PM
   3rd Shift  ________________ AM/PM

8. Average water use (in gallons) per month  ________________ Estimated [ ] Measured [ ]

9. Check all types of wastewater generated at the facility
   Domestic  [ ]
   Non-Contact Cooling Water  [ ]
   Contact Cooling Water  [ ]
   Process Water  [ ]
   Other (Explain)  ________________________________

   Equipment/Facility Washdown  [ ]
   Air Pollution Control Equipment  [ ]
   Boiler/Tower Blowdown  [ ]
   Stormwater Runoff to sewer  [ ]

10. This facility discharges to the following (check all that apply)
   Sanitary Sewer  [ ]
   Storm Sewer  [ ]
   Waste Haulers  [ ]
   Groundwater  [ ]
   Evaporation  [ ]
   Other (Explain)  ________________________________

   Signature of Responsible Official  ________________________________ Date  ________________________

http://www.dep.state.fl.us/water/wastewater/dom/pt_fgm.htm
Sorting and Compiling
Initial Inventory Information

- Creating a “database”
  - Database could be paper, spreadsheet, **Access®**
  - Organization and accessibility
Sorting and Compiling Initial Inventory Information

- Database parameters
  - Name of facility
  - Address
  - Contact information
  - SIC or NAICS codes / Type of business conducted
  - Pretreatment
  - Spill(slug) potential
  - Process floor drains
  - Comments
  - Date of last contact/inspection
IU Characterization

- Identification of possible SIUs and classification procedures

- Establishing criteria for reserving IUs for further or future review
IU Characterization
Types of Users

1) Industrial User (IU) [403.3(j)]

2) Significant Industrial User (SIU) [403.3(v)(1)]

3) Non-Significant Categorical Industrial User (NSCIU) [40 CFR 403.3(v)(2)]

4) Non-SIUs [40 CFR 403.3(v)(3),length=4]
Applying the Pretreatment Standards

- General and Specific Prohibited Discharges
  40 CFR 403.5(a) and (b)

- Categorical Pretreatment Standards
  40 CFR 405-471

- Local Limits/Other Local Concerns
Useful Tools for Categorizing CIUs

- Code of Federal Regulations – e-CFR
- EPA Effluent Limitations Guidelines Webpage
  water.epa.gov/scitech/wastetech/guide/industry.cfm
  - Development Documents
  - Preambles to proposed and final rulemaking
  - Rulemaking response to comments
  - Guidance Manuals
- Peer local Pretreatment programs
- State and EPA Pretreatment Coordinators
Local Concerns

- Local Limits

- Other Local Considerations
  - For example IUs controlled by BMPs or sector control programs (i.e., medical facilities, car washes, laundries, food service establishments)
  - Local pollutants of concern (i.e., lindane, molybdenum, oil and grease, mercury, silver)
IU Characterization

- Methods for obtaining additional information on the IUs in the Inventory
  - Drive bys (windshield inspections)
  - Industrial Waste Survey Forms
    - Cover letter
    - Track survey responses
  - Facility inspections
    - Sampling
    - Chemical inventory
No Pretreatment Requirements

- Best Buy
- Keith’s Leathers
- Plastic Widgets, Inc.
- H₂O in a Bottle, LLC

Unknown Requirements

- Source(s) of IU Information
- Characterize by Name/ Common Knowledge
- Gather More Info (survey, phone call, etc.)
- Initial Inspection/ Research Process
- Sampling/Monitoring
- Maintenance/Check-ups

Pretreatment Requirements

- Burger King
- Jay’s Metals
- Paul’s Trucking
- Moo Dairy

Source(s) of IU Information:
- Best Buy
- Keith’s Leathers
- Plastic Widgets, Inc.
- H₂O in a Bottle, LLC

Characterize by Name/ Common Knowledge:
- Best Buy
- Keith’s Leathers

Gather More Info (survey, phone call, etc.):
- Plastic Widgets, Inc.
- H₂O in a Bottle, LLC

Initial Inspection/ Research Process:
- Best Buy
- Keith’s Leathers
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Sampling/Monitoring:
- Best Buy
- Keith’s Leathers
- Plastic Widgets, Inc.
- H₂O in a Bottle, LLC

Maintenance/Check-ups:
- Best Buy
- Keith’s Leathers
- Plastic Widgets, Inc.
- H₂O in a Bottle, LLC
All Industrial Users (IUs)

- Significant Industrial Users (SIUs)
  - Categorical User
  - Non-Categorical User (Locally Significant)

- Non-SIU
  - Sector Control Program
  - Not Significant
    - Oil & Grease
    - Sand Interceptor
    - Silver Control
    - Mercury Control
Notification of IUs

403.8(f)(2)(iii)

- Notification of IUs of applicable Pretreatment Standard
- Applicable Pretreatment Standards or other Applicable Requirements
Annual Reporting Requirements

403.12(i)(1)

- An updated list of the POTW's Industrial Users
  - Name
  - Address
  - List of deletions to the list and an explanation
  - List of additions to the list
  - List of IUs subject to categorical Pretreatment Standards and Requirements
  - List of IUs subject to local Pretreatment Standards and Requirements
Follow Up: Maintenance of IU Inventory

- Regulatory requirement – 403.12(i)(1)

- POTWs with approved pretreatment programs must
  1. Submit an update list of IUs to their Approval Authority at least once a year
  2. Provide a brief description of each deletion
  3. Identify IUs subject to categorical pretreatment standards
  4. Identify IUs subject to local standards
  5. Identify IUs that are NSCIUs.
Maintenance of IU Inventory

- All POTWS with NPDES permits

Required to provide adequate notice to the Approval Authority information regarding any new introduction of pollutants into the POTW from an indirect discharger which would be subject to sections 301 or 306 of CWA.

[40 CFR 122.42(b)]
Ways to Update
IU Inventory Information

- Continual updates
- Periodic updates
Pros and Cons

**Continual Updates**
- **Pros:**
  - Proactive
  - Routine
  - Easier to manage
  - Less burdensome
  - More responsive to changes
  - More business friendly

- **Cons:**
  - More frequent

**Periodic Updates**
- **Pros:**
  - Less frequent

- **Cons:**
  - Reactive
  - Harder to manage
  - More burdensome
  - Less protective of POTW
Procedures for Updating Existing IU Information

- Review and update the existing IU list
  - Changes in quantity of wastewater discharged?
  - Changes in the types of waste discharged?
  - Still operational?
  - Changes in products produced?
Procedures for Updating Existing IU Information

- Review and update the existing IU list
  - Changes in processes used?
  - Changes in raw products used?
  - Notification from IU of pending changes?
  - Changes noted during routine site visits?
Procedures for Updating Existing IUs Information (cont.)

- Identify changes at existing IUs
  - Request additional information
    - Short Survey Form
      - One page survey
      - Name of facility, address, contact information
      - Description of processes on site and products produced
Procedures for Updating Existing IUs Information (cont.)

- Identify changes at existing IUs
  - Conduct additional site visits

- Industry Specific Questions
  - Appendix II of EPA’s Industrial User Inspection and Sampling Manual of POTWs (April 1994)
Industrial User Inventory and Characterization Procedures

**Summary**

- There is no one right way
- Required by Pretreatment regulations
- Resource-intensive
- Follow through and documentation is vital
- Fluid and dynamic process, maintenance is important