

Industrial User Classification

Brawley, CA

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TETRA TECH, INC.

Industrial User Classification

[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.
[40 CFR §403.3(h)]



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 CWA. [40 CFR §403.3(g)]



Significant Industrial User (SIU) [40 CFR §403.3(t)]

- Any Categorical Industrial User (CIU)
- $\geq 25,000$ gpd process wastewater
- $\geq 5\%$ hydraulic or organic loading
- Potential to adversely impact POTW or violate pretreatment standards



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/business license records**
- **Chamber of Commerce records**
- **Internet**
- **Field observations**



What to Search For...

- High Water Use
- Standard Industrial Classification (SIC) 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**



Initial Industrial Waste Survey (cont'd)

Additional information to request:

- Chemical Inventory
- Floor diagrams
- Sampling data



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'd

- **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 (SUO)
- Proactive approach
 - plumbing, building and/or occupancy permits
 - water billing records
 - local business journals
 - field observations
 - sewer connection applications
 - "utility connect questionnaires"



Summary

- POTWs 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

- Bradley & Faulk 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.



Problem #3

Initial Survey

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

