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)
- ≥ 25,000 gpd process wastewater
- ≥ 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 IUUs 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