

INDUSTRIAL USER WASTE SURVEY

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PRETREATMENT AND LABORATORY SERVICES

DALLAS WATER UTILITIES

OUTLINE

- What is that? (Characterizing IUs)
- Why do I have to do this? (Regulatory Requirements)
- What do I have to do? (Requirements of the IU Survey)
- How do I do this? (Development of the IU Inventory)
- What now? (Maintenance of the IU Inventory)

WHAT IS THAT? (CHARACTERIZING IUS)

- Publicly Owned Treatment Works (POTW) – a treatment works as defined by section 212 of the act, which is owned by a State or municipality. 40 CFR §403.3(q)
- Industrial User (IU) – any non-domestic user of your POTW. 40 CFR §403.3(j)

WHAT IS THAT? (CHARACTERIZING IUS)

- Significant Industrial User (SIU) – all IUs subject to Categorical Pretreatment Standards, any IU that discharges more than 25,000 gpd of process wastewater, 5% or more of your average dry weather hydraulic or organic capacity at the POTW, or as designated as such by the Control Authority because the IU has the potential to adversely effect the POTW. 40 CFR §403.3(v)(1)

WHAT IS THAT? (CHARACTERIZING IUS)

- Categorical Industrial User (CIU) – an IU subject to Categorical Pretreatment Standards under 40 CFR § 403.6 and 40 CFR chapter I, subchapter N. 40 CFR § 403.3(v)(1)(i)
 - Basically, operations generating wastewater discharge that can be found in 40 CFR §405-471 with Pretreatment Standards for either Existing Source or New Source users.

WHAT IS THAT? (CHARACTERIZING IUS)

- Non-Significant Categorical Industrial User (NSCIU) – The Control Authority may determine that an IU subject to Categorical Pretreatment Standards under §403.6 and 40 CFR chapter I, subchapter N is a NSCIU rather than a SIU on a finding that the IU **NEVER** discharges more than 100 gpd of total categorical wastewater. 40 CFR §403.3(v)(2)

WHY DO I HAVE TO DO THIS? (REGULATORY REQUIREMENTS)



- **40 CFR §403.8(f)(2)(i)**
 - POTWs must identify and locate all possible IUs which might be subject to the POTW Pretreatment Program.
 - Any compilation, index, or inventory must be made available to the EPA or delegated State upon request.

WHY DO I HAVE TO DO THIS? (REGULATORY REQUIREMENTS)

- **40 CFR §403.8(f)(2)(ii)**

- Identify the character and volume of pollutants contributed to the POTW by the IUs.
- This too shall be made available to the EPA or delegated State upon request.



WHY DO I HAVE TO DO THIS? (REGULATORY REQUIREMENTS)



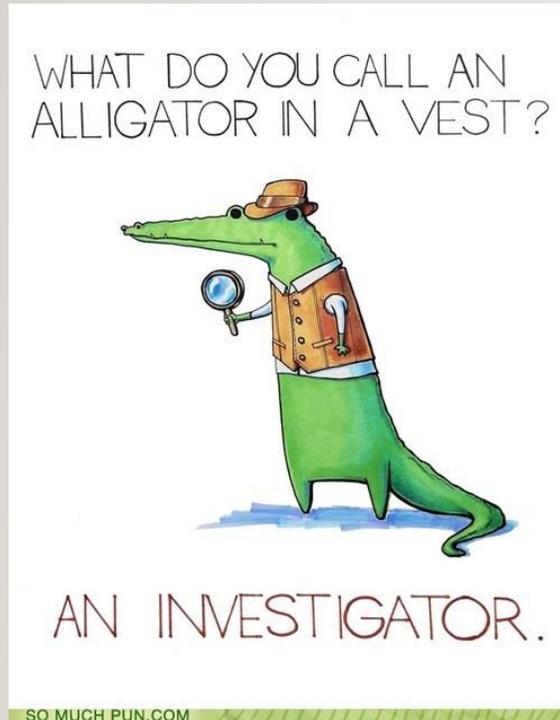
- **40 CFR §403.8(f)(2)(iii)**
 - Notify IUs of applicable Pretreatment Standards and requirements under sections 204(b) and 405 of the Act and subtitles C and D of RCRA.

WHY DO I HAVE TO DO THIS? (REGULATORY REQUIREMENTS)

- **40 CFR §403.8(f)(2)(iii)**
 - Within 30 days of Pretreatment Program approval:
 - List of SIUs
 - Notify each SIU of its status as such and all requirements applicable to it as a result of such status



WHY DO I HAVE TO DO THIS? (REGULATORY REQUIREMENTS)



- Why is this so important?
 - Knowing the number and types of IUs will help you to plan accordingly for the much needed resources required to implement an effective Pretreatment Program.

WHAT DO I HAVE TO DO? (REQUIREMENTS OF THE IU SURVEY)

- Identify all non-domestic users, or IUs, in your POTW's service area.
 - Specifically you are looking for those IUs that have the potential to cause:
 - Interference,
 - Pass-through,
 - Sludge contamination, or
 - Adversely impact the POTW/Collection System and/or the workers of these systems

WHAT DO I HAVE TO DO? (REQUIREMENTS OF THE IU SURVEY)

- Send a survey to all IUs asking for contact information, detailed description of activity, water usage, chemicals, and wastewater treatment (if applicable).
- Follow-up to obtain a high rate of response and additional information, if necessary.

WHAT DO I HAVE TO DO? (REQUIREMENTS OF THE IU SURVEY)

- Flag “low hanging fruit” for quick action to investigate further:
 - High water usage,
 - Manufacturing operations,
 - Services involving taking in water,
 - Etc.
- Perform site visits for non-responsive IUs and IUs that fit the definition of a SIU.

WHAT DO I HAVE TO DO? (REQUIREMENTS OF THE IU SURVEY)

- Document, Document, Document, Document, and Document some more!!!!



WHAT DO I HAVE TO DO? (REQUIREMENTS OF THE IU SURVEY)

- A never ending list of items to document begins now:
 - How did I get the list of IUs,
 - What was my response rate,
 - Who responded,
 - Who didn't respond,
 - What information did I gather,
 - Was there a follow-up,
 - What were the results,
 - Etc., Etc., Etc.

HOW DO I DO THIS? (DEVELOPMENT OF THE IU INVENTORY)

- Seems all fine and dandy, right? But how do I actually find IUs to survey?
 - Water Bills
 - Manufacturing directories
 - Chamber of Commerce
 - Certificates of Occupancies (COs)
 - Drive-bys
 - Toxic Release Inventory (TRI)
 - Economic Development

HOW DO I DO THIS? (DEVELOPMENT OF THE IU INVENTORY)

- Seems all fine and dandy, right? But how do I actually find IUs to survey? Cont.
 - Online searches
 - Try using keywords such as: plating, soaps & detergents, food manufacturing, etc.
 - Newspapers
 - Business journals
 - Envirofacts
 - <https://www3.epa.gov/enviro/>
 - Property tax records

WHAT NOW? (MAINTENANCE OF THE IU INVENTORY)

- When to conduct the survey?
 - Pretreatment Program Development
 - Upon noticing a trend in pollutant loadings
 - After WWTP violations or upsets
 - NPDES permit application or renewal
 - Collection system issues
 - Promulgation of new federal requirements, and

WHAT NOW? (MAINTENANCE OF THE IU INVENTORY)

- **Continually!!!!**

- You may never know when operations change and/or when someone new moves into your back yard.

WHAT NOW? (MAINTENANCE OF THE IU INVENTORY)

- Develop, or buy, a database to track all of this information.
 - Format can vary: Paper, Excel, Access, Etc.
 - Needs to be organized and easily maintainable.
 - Contain basic contact information, actions at last contact, date of last contact, etc.
- Develop clear procedures to track survey response and criteria for determining IUs/SIUs/CIUs status.
- Periodically revisit previously cleared facilities. **CONDITIONS CHANGE!**

INDUSTRIAL WASTE SURVEY CONCLUSIONS

- Resource intensive so funding needs to be available.
- Required by Federal law so you've got to do it if you meet the requirements.
- There is no one way to do this, there are wide variations from one program to another.
- Follow through and documentation are extremely important.
- Breath and use your resources, **INCLUDING** other Pretreatment Coordinators.

THE FUN PART!

Questions?

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