

Industrial User Survey Guidance



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Department of
Environmental
Quality

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restoring, maintaining and
enhancing the quality of
Oregon's air, land and
water.*

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Alternative formats (Braille, large type) of this document can be made available.

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1. Purpose and Applicability

The purpose of this policy is to provide guidance to Oregon publicly owned wastewater treatment works (POTWs) on procedures for conducting an industrial user survey. Federal regulations for both general pretreatment requirements (40 CFR 403.8(f)(2)), and national pollutant discharge elimination system (NPDES) permit requirements that pertain to all POTWs ((40 CFR 122.44(j)(1) and 122.42(b)) require POTWs to identify and locate all possible significant industrial users discharging process wastewaters – and associated pollutants - to the public sewer system and treatment facilities. Oregon administrative rules (OAR 340-045-0063) further establish that *any* domestic POTW, including those issued a state water pollution control facility (WPCF) permit rather than a national pollutant discharge elimination system (NPDES) permit, and regardless of the size of the treatment plant, which receives wastewater from industrial sources is required to conduct an IU survey. EPA has not established specific guidance on how local programs conduct IU surveys; this guidance is intended to support local programs in completing this task, but does not establish any duty or obligation to follow the specific procedures suggested herein.

For more information regarding this guidance please contact DEQ's Pretreatment Coordinator, Nicole Morris, at Industrial.pretreatment@deq.oregon.gov.

2. Summary

Section 403.8(f)(2) of the general pretreatment regulations requires POTWs to identify and locate all possible industrial users subject to the pretreatment program, and to identify the volume and character of pollutants discharged by these users. The Industrial User (IU) Survey is commonly used to develop a list of all businesses in the POTW's service area that discharge wastewater that is not "domestic" to the sewage treatment plant, and to obtain information specific to each industry's wastewater discharge characteristics. This information is essential in determining the need to develop a pretreatment program, and to implementing a local program. The data you collect identifying industries and their waste generating processes, discharge volumes and characteristics, forms the basis for each of the key elements of a local pretreatment program; it enables you to determine which industries have the potential to impact the POTW; and it will be used to establish local limits to protect both the treatment plant and receiving water body.

3. Industrial User Survey Procedures

This guidance recommends step by step procedures for designing, implementing, and documenting an industrial user survey and achieving the goal of the survey effort: to identify and characterize wastewaters discharged by industrial users which may impact your treatment plant and which must be controlled by the local POTW. Reading and understanding this policy, consulting with DEQ regarding any questions, and talking to other local POTWs who have performed IU surveys will serve you in your survey efforts.

Prior to initiating the IU survey, you should review the legal authorities available to you to compel businesses in your jurisdiction, and any contributing jurisdictions, to complete and submit the survey. Typically this authority is obtained through your local sewer use ordinance, which will specify what businesses must do to get public sewer service, and should provide for an escalating enforcement response to achieve compliance.

The industrial user survey comprises five major activities:

1. Compiling an initial master list of potential industrial users located in the POTW service area.
2. Surveying each of these industries to collect the information necessary to determine whether the industry is subject to pretreatment regulations.
3. Conducting follow-up activities, where needed, to obtain complete and accurate information.
4. Summarizing the data for use in developing the pretreatment program.
5. Performing on-going surveys for new industrial users.

Each of these activities is discussed in detail below.

3.1 Compile a Master List of Industrial Users

The first step in conducting an IU Survey is to develop a master list of all industries in your service area that discharge to the public sewage treatment system. The following sources of information are helpful in identifying industrial sources:

- Water utility billing records (useful for determining daily consumption rate).
- Business license records.
- GIS data systems and review of commercial maps.
- Building permits.
- Sewer connection permits.
- Commercial directories of industries in the area, and internet searches for specific industries (e.g., metal finishing, anodizing, machine shop, semiconductor, etc.).
- Property tax records.
- Fire Department emergency management plans and records.

Lists of IUs from these sources are usually very complete and likely the best places to start in compiling a master list. If your POTW receives wastewater from other jurisdictions, you will need to work with those contributing jurisdictions to identify their IUs discharging wastewater to your POTW.

To support you in the industrial survey effort you will benefit from creating an initial master list of industrial users to document initial information for each prospective business you will be surveying, including for example the business name, address, contact person to send the survey to, if known and any additional information initially available related to the industrial processes and wastewater discharges. Appendix A provides an example IU survey master list that can also be used to track survey responses (see Form 1). You can also use a master list such as in the example provided in Form 1 to prioritize your survey efforts, for example if you choose to stagger the mailing of surveys so as to spread out the workload of processing returned forms and compiling results from returned forms.

3.2 Survey Industrial Users

Once an initial master list has been compiled, the next step is to gather data from each IU. This information may be gathered by using survey questionnaires, telephone calls or by visiting IUs. Some information may already be on file at the POTW. If your POTW has a small service area and has very few industries, you may choose to visit or call to survey these industries. A POTW can also sponsor a workshop

to distribute and explain survey questionnaires to its IUs. Questions about the survey or the local pretreatment program can be answered at this time. Most POTWs use surveys to gather the required information.

POTWs with current industrial information may find it feasible to eliminate particular industries or groups of industries from survey efforts if the industry:

- Does not generate wastewater (i.e., dry manufacturing process).
- Has its own NPDES permit to discharge to a receiving stream (i.e., a direct discharger).
- Discharges non-domestic (non-industrial) wastewater only (e.g., theaters, beauty shops, barber shops, retail stores, and offices).
- Does not contribute to problems in the collection system or the treatment plant involving oil and grease or other discharged substances (e.g., multi-family housing units, hotels, motels, and gas stations).

You should have reliable, verifiable information in order to eliminate any industry from the list. In addition, criteria for eliminating the industry from this list should be valid (e.g., that the industry generates domestic wastewater only) and should be documented and included with the IU Survey and pretreatment program documents you submit to DEQ. An example form that can be used to document your decisions regarding industries eliminated from further survey efforts, and the reason for their elimination, is included in Appendix A (see Form 2).

In developing your IU survey you should ensure that the survey is easy to read and understand, and that you have explained the purpose and use of the survey information collected. Often POTWs choose to conduct an initial survey with fewer questions (shorter forms) to identify those industries for which they will collect additional industrial process/wastewater information for purposes of characterizing and determining industries subject to pretreatment requirements, and whose discharged wastewaters could negatively impact the treatment plant.

The survey should require the signature of an official authorized to sign for the company, as well as the name and phone number of a company representative who can be contacted to arrange site visits for inspection and monitoring. Sample surveys are provided in Appendix A.

Your survey should include at a minimum the first seven of the data elements listed below; the additional data elements can be collected either in your initial survey or by conducting follow-up (e.g., sending a permit application or longer survey form) to obtain this necessary information.

- Name of industry.
- Address of facility.
- NAICS code, if required. (Codes can be found at <http://www.naics.com/search.htm>; SIC codes can be crosswalked to NAICS codes on this site.)
- Major products manufactured or services supplied.
- Process wastewater flow (if unknown, may use water consumption rate).
- Description of existing on-site pretreatment facilities.
- A list of all environmental permits held by the discharger.
- Pollutants discharged in wastewater (analytical results, if available).
- Categorical industrial pretreatment standards the IU is subject to.

- Types and quantities of industrial wastes generated that would otherwise be subject to regulation as hazardous waste.¹

DEQ recommends sending a letter to accompany the survey which explains the purpose of the local pretreatment program and industrial user survey, and describes how survey data will be used. The letter should also clearly state the deadline for completing and returning the survey, and the consequences of failing to submit a completed survey. Approximately two to three weeks should be sufficient time to expect receipt of the completed survey. The name and telephone number of a municipal official who can be contacted if the industries have questions about the survey should be included in the letter. A sample survey letter is also included in Appendix A.

To increase the initial response rate, POTWs have found that several additional actions can be helpful:

- Develop an outreach strategy, and to the degree your resources allow, contact each facility before sending the survey form so they know it is a legitimate and important request.
- Include a stamped, pre-addressed envelope for returning the completed survey, or label the form such that when folded it is ready to send back through the mail.
- Send the survey forms “address correction requested” so the POTW gets the present location of any facility that has moved.

3.3 Conduct Follow-Up Activities

As industrial user survey responses are gathered, they should be reviewed for completeness and accuracy. You will also need to track receipt of surveys to identify those businesses you will need to follow-up with. The initial master list you created will enable you to track businesses that return a properly completed survey and those that do not respond to the initial mailing (Appendix A, Form 1).

For industries that do not respond by the deadline, the POTW should undertake follow-up activities, such as reminder letters or postcards, telephone calls, or site visits. A maximum of approximately four to six weeks from the initial survey mail-out date should be sufficient time to receive a completed survey and initiate follow-up activities. The POTW should ensure that the deadline for submitting the completed survey is clear, and may wish to follow-up prior to the deadline (as resources allow).

The amount of time you will need for follow-up activities will vary according to the number of industries you are surveying. Your program submission should describe the follow-up measures used and list any IUs that ultimately did not submit a completed form.

3.4 Summarize Survey Results

Your next step will be to summarize the type and number of local IUs and the types and quantities of specific pollutants, particularly toxic pollutants, entering the treatment plant and collection system. This summary will be used to develop and document determinations regarding the industrial user status of each survey recipient (including significant industrial users, categorical industrial users, and other IUs whose discharge could potentially adversely affect the POTW – see pg. 5). These decisions form the basis for determining whether the POTW is required to develop a pretreatment program, but also inform local

¹ Appendix A, IU survey Example 1 includes language that you may use to address this required notification in the survey itself. Appendix D provides an example letter regarding hazardous waste notification requirements, which can be sent with your original IU survey request or, to those businesses that you have confirmed generate and discharge industrial wastewaters to the POTW.

decisions on the advisability of voluntarily developing a pretreatment program when not specifically required.

Maintaining a summary of industrial survey data will also be useful in determining possible IU sampling and monitoring schedules to address treatment plant, biosolids, or collection system issues. It is helpful to maintain a summary of survey results when operating more than one treatment plant and/or servicing other jurisdictions with your plant. Finally, the data collected in the initial survey - and in survey follow-up - will support you in identifying pollutants of concern, for use in the development of site-specific local effluent limits (Local Limits).

When developing a data management file or electronic spreadsheet for IUs discharging to the POTW, the information compiled should include:

- Company name, address, contact person their title, and phone number.
- Type of business, products produced, and if applicable, manufacturing process.
- Estimates of water usage and estimate of process water discharged.
- Pollutants found in discharged wastewater, if other than domestic.
- Types of hazardous wastes generated and how they are disposed of.

This survey summary should list only those industries that discharge non-domestic industrial wastewater to the POTW. Data from the table can be organized in several formats:

- By NAICS (SIC) categories
- By specific pollutants
- By POTW

Remember to also document your decisions regarding businesses that were eliminated from further survey consideration and the reason(s) why, using a form such as that suggested in Appendix A (Form 2).

Appendix B includes a suggested format to list industrial user survey data received from each industry surveyed by the POTW. Additional pages (or columns) can be added as information is obtained, for example, related to the character or volume of waste discharged by the IUs, including wastewater pollutants. To assist you in compiling pollutant data, Appendix C provides a list of the priority pollutants commonly found in the discharges of categorical industries and the NAICS codes for industries affected by categorical standards.

3.4.1 Classification of Industrial Users

The purpose of the IU survey inventory is to identify and locate all possible IUs subject to the POTW pretreatment program; classifying IUs is essential to this task – and to determining whether development of a local pretreatment program is required, or advisable. The federal pretreatment regulations (40 CFR 403.3) establish the following classification of IUs:

- Significant Industrial Users: are those IUs subject to the POTW pretreatment program. SIUs must be regulated with an individual control mechanism, such as an industrial wastewater discharge permit.²

² Note that, as further explained in Section 3.5, the definition of SIU which triggers development of a pretreatment program under federal rules (40 CFR 403.8) apply to any POTW, or combination of POTWs operated by the same authority, with a total dry weather design flow of greater than 5 MGD and receiving from industrial users pollutants which could cause pass through or interference, or which are otherwise subject to pretreatment standards.

An SIU is defined as any industry that:

1. Discharges *process* wastewater of 25,000 gallons per day or more, or whose discharge makes up 5 percent or more of the average dry weather hydraulic capacity of the treatment plant, excluding non-contact cooling water, cooling tower, and boiler blow down (if these do not contain pollutants of concern).
2. Contributes a nondomestic waste stream which makes up 5 percent or more of the average dry weather organic (typically BOD) capacity of the treatment plant. Industrial bakeries, food processors and dairy and beverage bottlers can discharge high levels of BOD.
3. Has a reasonable potential, in the opinion of the POTW, to adversely affect the POTW treatment plant - based on the types and amounts of pollutants the facility discharges or has the potential to discharge. E.g., an IU that the POTW believes has a reasonable potential to exceed a local pollutant limit.
4. Conducts categorical processes (a Categorical Industrial User, or CIU).

- Categorical Industrial User:

Categorical processes are certain industrial processes designated by EPA's effluent guidelines program as requiring effluent limits. If an industry conducts any categorical process for which the EPA has established pretreatment standards, then the industry is regulated as a CIU and is required to be controlled by the POTW. As of 2012, there are 57 industry types identified, however only 35 of these have pretreatment standards. A list of categorical industrial processes is found in Appendix C.

Identifying industries with categorical processes can be the most difficult part of conducting an IU survey because it requires the POTW to have an understanding of the industrial processes used to manufacture a product. For example, Industry X manufactures helicopter parts. The manufacturing of helicopter parts is not a categorical process. However, the facility has a sub process that electroplates chrome on one part and rinse water from the plating process is discharged to the POTW. Any type of metal finishing, in this case electroplating, is a categorical process so that industry is most likely an SIU (and a CIU).

- IU's with potential to adversely affect a POTW:

Examples of wastestreams which may pose a reasonable potential to adversely affect a POTW treatment plant include:

Metal containing waste streams, which can inhibit the bacteria in a treatment plant or pass-through it and enter the receiving stream causing the POTW to violate water quality standards. Metals can also accumulate in the sludge, rendering it unsuitable for land application. Common metals of concern found in industrial applications include: arsenic, cadmium, chromium, copper, iron, lead, mercury, molybdenum, nickel, selenium, silver and zinc.

Organic chemicals in sufficient quantities to inhibit the treatment process or pass through to the receiving stream. These include compounds like acetone, benzene, chloroform, phenol, tetrachloroethene, toluene, and xylene, and any type of biocide. Some organic compounds can overload the treatment plant with BOD, like ethylene or propylene glycol (coolants), isopropyl alcohol (IPA) and acetate (vinegar). Many of these organic compounds are flammable and present an explosion hazard in the collection system. Mineral and petroleum oils can obstruct flow in the collection system and interfere with plant operations.

Acids and Bases (e.g., hydrochloric, hydrofluoric, sulfuric, phosphoric acids and base caustics, potash, lye), which can damage the POTW and endanger worker welfare.

- Other IUs:

You may want to track other IUs, e.g., small industries and some commercial users (restaurants, auto repair shops, dental facilities, etc.) whose individual discharges do not significantly impact the treatment system, degrade water quality, or contaminate sludge and that do not conduct categorical processes. The POTW is not required to issue control mechanisms to these facilities, but may do so if there is a local concern about these discharges and your sewer use ordinance provides the authority to do so.

3.4.2 Industrial User Survey Data Management

In conducting the IU Survey, a POTW (especially a large one with many industrial users) will generate data that must be summarized and readily accessible. To manage this information, you will need to establish a data management system, either by developing a new filing system, expanding your current filing system, or using a database. Your data management system should support the following tasks:

- Accepting IU survey data.
- Printing labels for mailing out questionnaires, notices, etc.
- Tracking the status of each mailed questionnaire.
- Storing survey responses in an accessible manner.
- Providing aggregate data statistics.
- Incorporating data from future monitoring programs.

While the data management system would track industrial user survey responses, the actual forms returned to your office should be compiled in alphabetical order and include a date stamp and initial of the person who reviewed the form. The length of time to store these would depend on your agency's record retention policy, the state's record retention policy and the amount of time your program is comfortable in holding on to these documents. IU survey data that supports a POTW determination that an industry is not subject to a categorical pretreatment standard would be useful to retain beyond typically-prescribed retention periods. Talk to DEQ if you have any questions regarding this.

3.4.3 Industrial User Survey Information for the Program Submission

To adequately document the IU survey and assist the DEQ in reviewing your initial pretreatment program, you should submit the following information:

- Sources used to compile a comprehensive (master) list of IUs.
- Methods used for the survey (questionnaire, site visit, telephone, etc.).
- A copy of the survey and the letter sent to the industries including dates the forms were sent (if survey was used).
- A description of follow-up actions taken by the POTW to obtain properly completed survey forms from IUs, and the response rate for the entire survey (including industries that did not return completed survey forms despite follow-up actions).
- A master list of all industries discharging to the treatment plant that:
 - Indicates which industries were eliminated from the survey, and the criteria used to eliminate them.
 - Summarizes survey results, including a list of IUs subject to pretreatment program requirements, a classification of these users (either by NAICs code, industrial category, or other appropriate scheme), and a list of pollutants known or suspected to be discharged from each IU. Where available, information on the concentrations of these pollutants should also be presented.

These two items can appear either separately or together as a master list.

3.5 Determining whether a local pretreatment program is needed or required

The IU Survey is intended to identify sources which may be subject to pretreatment requirements, and whose presence triggers the requirement for a POTW to develop a local pretreatment program to control discharges from industrial sources.

For treatment plants with a dry weather capacity of 5 MGD or more (the minimum size which triggers pretreatment requirements at the federal level), the presence of any SIUs - categorical or not – will trigger the need to develop a local pretreatment program. For POTWs with less than a 5 MGD dry weather capacity, or for facilities that are operated under a state Water Pollution Control Facility (WPCF) permit, it is the presence of a categorical industry discharging wastewater to the POTW which would trigger the requirement to develop a pretreatment program in Oregon. State rules specifically delegate the responsibility to develop a pretreatment program, and to issue control mechanisms to categorical and significant industrial users, to local communities.

A POTW may also be required to develop a pretreatment program if there has been a history of compliance issues related to industrial discharges. The IU survey provides valuable information for local POTWs in managing discharges and protecting sanitary conveyance and treatment plant operations. In addition, the POTW may discover sources whose discharge, collectively (or individually), could impact the treatment plant. For example, a number of breweries or food processing facilities, who individually may pose no significant concerns to the POTW, collectively could have an impact that the POTW wants to have greater control over. Choosing to voluntarily develop a pretreatment program can provide the legal authority and compliance monitoring necessary to better control these discharges to the treatment plant and collection system.

3.6 Ongoing Survey Efforts

After establishing a master list of IUs, the POTW will need to institute an ongoing survey effort to identify new IUs. This allows the POTW to identify potential SIUs before they begin discharging process wastewater.

There are many different methods to identify new IUs and a comprehensive ongoing effort should incorporate more than one method. Methodologies used depend upon the resources available to the POTW. Efficient survey efforts can be linked to other utility or municipality processes. Examples of potential resources:

- *Business Licenses*
 - Incorporate the IU survey as part of the business license process. In order for a business to receive a license, a business must complete the IU survey.
 - Have a copy of business licenses sent to the POTW. The POTW can then survey qualifying industries.
- *Utility Billing*
 - Integrate new commercial utility account starts into a POTW database.
 - Receive weekly updates from customer service on new accounts.
 - Work with utility customer service departments to classify new commercial accounts by type (e.g., industry, manufacturing, food service, medical service, auto repair).

- *Work with other regulatory agencies in your jurisdiction.*
 - Storm water permits – Many industries are required to obtain storm water permits. Develop a collaborative relationship exchanging permittee information with your local storm water permitting authority (DEQ).
 - Hazardous waste program – Work with your local DEQ hazardous waste contact to find businesses reporting hazardous waste generation.
- *Industrial Parks*
 - Conduct periodic drive-by surveys of industrial parks in your jurisdiction to identify new tenants.

When is it appropriate to re-survey?

Generally, local programs should have procedures in place to keep their IU survey up to date. Existing pretreatment programs are required to update their survey on an annual basis and to report changes in their annual pretreatment report. Non-pretreatment POTWs are required to submit an update to their IU survey with their permit renewal application, every 5 years.

In certain circumstances it may be appropriate to conduct another baseline survey. For example, if the initial survey was not comprehensive, or the POTW fails to implement effective survey update procedures, a POTW may choose or be required to conduct another baseline survey - or modify procedures to maintain the baseline survey. In general, by implementing a thorough initial and continuous ongoing survey process, the POTW may avoid the need to repeat a baseline survey.

Appendix A. Example IU Survey Forms

Form 1: IU Survey Initial Master List

[illegible]

Form 2: Businesses Eliminated from IU Survey

Company Name	Contact Name & Phone #	Total flow rate	Reason eliminated from survey
Company Address	Business	Domestic flow rate	Reason for difference between total and domestic flow rate (if any)
Anderson, Inc.	John Anderson, Pres. 222-1234	8,000 GPD	All discharges are similar in nature and concentration to domestic flow.
15 SE 9 th Street	Drafting Company	6,000 GPD	There is 2,000 GPD discharge of condensate from air conditioning systems.
Cobol Enterprises	Joe Green, Manager	2,000 GPD	All discharges are similar in nature and concentration to domestic flow.
21 Main Street	Branch sales office	2,000 GPD	

General Screening Criteria Examples:

Reasons for not surveying Industries (commercial customers):

- The customer is known to not have the potential to discharge other than domestic wastewater, or
- The POTW does not believe that non-domestic waste streams are generated and has verbally confirmed this; the potential for error is low.

Reasons for eliminated Industries after receiving a completed IU survey:

- All discharges have been determined to be similar in character and nature to what is typical of “domestic wastewater.”
- The only possible contaminant is vegetable and/or animal grease for which there is a grease trap with a maintenance schedule.

Other acceptable reasons for eliminated Industries:

- The industrial user has only a discharge of noncontact cooling water and/or boiler blow down.
- The industrial user has only a discharge of other unpolluted waters (explain).
- The industrial user has only a discharge of condensate from air conditioning or dehumidification systems.
- Non-domestic wastestreams are present, but are not discharged to the POTW (note disposal method).
- The industry uses a recirculating or other “zero discharge” system for which a maintenance plan exists and records kept to ensure against batch discharge to the POTW.
- All of the industry’s non-domestic wastewaters are sent to a disposal facility and disposal records are maintained for a minimum of 3 years.

(Although dischargers in this third grouping may be eliminated by the POTW, it is essential that a signed and properly completed survey form be returned for each industry eliminated based on this last group of screening criteria. The POTW should keep this signed completed IU Survey form until after the next IU Survey is completed. This will protect the POTW from liability from industries which begin discharge of significant levels of pollutants between surveys.)

Example IU Survey Letter

April 15, 2012

Anybody Industries
PO Box 1000
Any City, OR 97000

RE: Industrial Pretreatment Program
[Municipality]

[Municipality] is conducting a survey of non-residential users connected to its sewer system. We rely on your answers to help achieve our commitment of providing a Municipality that meets the requirements of the Environmental Protection Agency's mandated Industrial Pretreatment Program. Your responses to the questionnaire will help [Municipality] achieve those requirements as cost effectively as possible.

[Municipality's] Industrial Pretreatment Program is responsible for preventing harmful pollutants from entering its sanitary sewer system that could:

- Impair the sewerage and treatment systems or its operations;
- Pass through the sewer treatment plant and contaminate the Willamette River;
- Impair the quality of municipal digested sludge (biosolids) or reclaimed effluent.

Enclosed is a *Non-Residential Survey* as well as a self-addressed envelope. Please return the completed questionnaire by April 30th. If you have questions or need assistance in completing the questionnaire, please do not hesitate to contact us at phone number or email address.

The information that you provide contributes to the success of our environmental programs and protects our water resources. Your help and cooperation with this environmental survey is vital to the success of these programs and is sincerely appreciated.

Sincerely,

Example 1: Industrial User Survey

Company Name:

Business Telephone:

Business Address (Site/Location address):

Business Mailing Address:

Representative Completing this Form:

Check all categories that apply:

☐Retail ☐Food Establishment ☐Auto Shop/Repair/Detailing ☐Manufacturing ☐Photo Processing
☐Transportation/Equipment Cleaning ☐Salvage Operations ☐Fuel Dispensing
☐Medical/Veterinarian ☐Dentistry/Orthodontics ☐Animal Daycare ☐Other

Brief Description of Business Activities both inside and outside your Building: Principal Activity, Product and/or Service.

Performed: Inside Bldg. ☐ (Please be specific)

Outside Bldg. ☐

1. Does your company use water that results in other than domestic discharge? See Definitions Yes ☐ No ☐

If Yes, explain what it is used for, where and how it is collected and disposed of:

2. Are you adding water fixtures to the tenant space/building you intend to occupy? Yes ☐ No ☐

If Yes, what types of fixtures are you proposing to add? How many of each type of fixture?

3. A. Does your company use or handle any chemicals? Indoor ☐ Outdoor ☐ None ☐

B. Does your company generate any chemical waste? Indoor ☐ Outdoor ☐ None ☐

C. Do you or will you have any type of chemical storage at your facility? Indoor ☐ Outdoor ☐ None ☐

4. Do you or will you have any floor drains, catch basins, sumps, sinks or any other outlets to the sanitary sewer or storm system in your manufacturing/production or storage areas? Sanitary Sewer Storm System

Yes ☐ No ☐

5. What are the characteristics of the discharged wastewater (if other than domestic)?

☐Acid ☐Metallic ☐Color Dyes ☐Soaps/Detergents ☐Amalgam

☐Alkaline ☐Toxic Organics ☐Fats, Oil & Grease ☐Hot Water _____ degrees ☐Medicine/Rx

6. What is the quantity of wastewater discharged to the sanitary sewer in gallons per day (gpd)?

Less than 10,000 gpd ☐ 10,000 to 25,000 gpd ☐ More than 25,000 gpd ☐

7. Does your company create wash water? See Definitions Yes ☐ No ☐

If Yes, where will the wash water be collected and disposed?

8. Is there stormwater runoff from areas where materials, chemicals or equipment are handled or stored outside?

Yes ☐ No ☐

If Yes, explain

9. Does your facility discharge wastes to the sanitary sewer that would otherwise be considered hazardous waste?

Yes ☐ No ☐

If Yes, you are required to report such discharges to the City of [Municipality], Oregon Department of Environmental Quality, and Environmental Protection Agency Regional office, per 40 CFR 403.8(f)(2)(iii) and [insert local code requirement].

The City of [Municipality] advises you that your facility may be subject to solid or hazardous waste management requirements pursuant to the Federal Resource Conservation and Recovery Act (RCRA) and the State of Oregon hazardous waste management regulations. If your facility discharges hazardous waste to the sanitary sewer system, you are required to report such discharges to the City of [Municipality], Oregon Department of Environmental Quality, and Environmental Protection Agency Regional office, per 40 CFR 403.8(f)(2)(iii) and [insert local code requirement].

To determine which wastes are considered hazardous, refer to title 40 Code of Federal Regulations, part 261 or consult the Oregon Department of Environmental Quality, Hazardous Waste Program at 503-863-4797 or www.oregon.gov/deq.

Example 2: Industrial User Survey

Municipality Name
Address
Phone Number

1. Company Name: _____
2. a) Facility Address _____
City _____ State _____ Zip _____
b) Is this facility located in a tenant building or industrial park? Yes _____ No _____
3. Mailing Address: Street Address: _____
City _____ State _____ Zip _____
4. Provide name of person to contact regarding information contained in this questionnaire:
Name: _____ Telephone: _____
Title: _____ Fax: _____
5. a) Provide a brief description of manufacturing or service activities performed at this facility:

b) Enter Applicable SIC code(s): _____
6. Enter number of shifts daily: _____ Enter total number of employees: _____
Circle the days of operation: **S M T W T F S**
7. Is this facility connected to the District's sanitary sewer? Yes _____ No _____
If "No", are there plans to connect? Yes _____ No _____
If "Yes", indicate when: _____
8. Does this facility receive billing statements from Water Environment Services? Yes _____ No _____
If "yes", please list your account number(s). If you have more than three accounts, list those which have the highest water usage:

9. Quantity of wastewater discharged in gallons per day? An estimate may be obtained from your monthly water bill: 400 units per month = 10,000 gpd.

Less than 10,000 ____ 10,000 to 25,000 ____ 25,000 to 100,000 ____ More than 100,000 ____
10. Do you use or store liquid chemicals in quantities of 55 gallons or more? Yes _____ No _____
Do you use or store dry chemicals in quantities of 500 pounds or more? Yes _____ No _____
Are you required to report under Oregon State Fire Marshall requirements? Yes _____ No _____
Do you store/use materials, chemicals, products, equipment, or waste materials in outside areas? Yes _____ No _____
11. Does your facility have an oil and grease/water separator? Yes _____ No _____
If "Yes", what is its flow capacity? _____

12. Waste removed from premises:

Are there any solids, liquids, or other wastes removed by a septic service or other chemical hauler?

Yes _____ No _____

If "Yes", identify the materials, quantities and frequency of service: _____

Name, address and telephone number of hauler(s): _____

13. Does your facility generate process wastewater, not including domestic wastewater? Yes _____ No _____

a) Is this wastewater discharged to the sewer system? Yes _____ No _____

b) Does this process wastewater undergo any pretreatment? If so, please describe:

c) Describe process wastewater: _____

Volume estimate _____ Units _____

14. Does your facility discharge any substance, which, if otherwise disposed of would be a hazardous waste as defined under 40 CFR part 261?

Yes _____ No _____

[If discharge is more than 15 kg (33 lbs.) per month of RCRA hazardous waste or a discharge of any quantity of acutely hazardous waste, please complete form on the back of the attached Hazardous Waste Notification Notice.]

15. Does stormwater come into contact with any process(es) at your facility? Yes _____ No _____

16. Do you clean equipment or vehicles at your facility? _____ No _____

If "Yes", is the wash water or wastewater:

Discharged to the Sanitary Sewer _____ Discharge to the Storm Sewer _____ 100% Recycled _____

Removed Off-Site _____ Other _____

17. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. [40 CFR 403.6(a)(2)(ii)]

Name (please print) _____ Title _____

Signature _____ Date _____

Classification of surveyed industrial users:

[illegible]

Appendix C. Categorical Industries

Industrial Category	40 CFR	NAICS Code	Regulated Parameters
Aluminum Forming	467	331315, 331316 331319, 332112	Cr, CN, Zn, TTO
Asbestos Manufacturing	427	336340, 336350	None
Battery Manufacturing	461	335911, 335912	Cd, Ni, Zn, Co, Cu, Pb, Mn, Hg, Cr, Ag, CN
Canned and Preserved Fruits and Vegetable Processing	407	311421	None
Canned and Preserved Seafood Processing	408	311710	None
Carbon Black Manufacturing	458	2325182	Oil/Grease
Cement Manufacturing	411	327310	None
Centralized Waste Treatment	437	562211, 562219	Sb, As, Cd, Cr, Co, Cu, Pb, Hg, Ni, Ag, Sn, Ti, Zn, cyanide and 8 organic compounds
Coal Mining	434	212111, 212112	None
Coil Coating	465	332431, 332439 339314, 332999	Cr, CN, Zn, TTO, Oil/Grease, Mn, F, Phosphorus, Cu
Concentrated Animal Feeding Operations (CAFO)	412	112112, 112210 112410	None
Concentrated Aquatic Animal Production (Aquaculture)	451	112519	None
Copper Forming	468	331421, 331422 332112	Cr, Cu, Pb, Ni, Zn, TTO, Oil/Grease
Dairy Products Processing	405	311511, 311514	None
Electrical and Electronic Components	469	Various	As, Cd, Cr, F, P, Mn, TTO, Oil/Grease
Electroplating	413	332813	Cd, Cr, Cu, Pb, Ni, Ag, CN, Zn, TTO
Explosives Manufacturing	457	325920	None
FerroAlloy Manufacture	424	331110	None
Fertilizer Manufacturing	418	325311, 325312	Ammonia, Nitrates, Phosphorus

Industrial Category	40 CFR	NAICS Code	Regulated Parameters
Glass Manufacturing	426	327211, 327212 327213	Phosphorus, Oil (mineral), Fluoride
Grain Mills Manufacturing	406	Various	None
Gum and Wood Chemicals	454	325194	None
Hospitals	460	Various	None
Ink Formulating	447	325910	No Discharge
Inorganic Chemicals	415	325181, 325120 325131	Hg, Pb, F, Ni, Zn, Cr, COD, Fe, TSS, Cu, Se, CN, Cd, Co, Sb, As
Iron and Steel Manufacturing	420	331110	Cr, CN, Ni, Pb, Zn, Ammonia, Naphthalene, Tetrachloroethylene
Leather Tanning and Finishing	425	316110	Cr, Sulfides
Meat Products	432	Various	None
Metal Finishing	433	Various	Cd, Cr, Cu, Pb, Ni, Ag, CN, Zn, TTO
Metal Molding and Casting	464	Various	Cr, Pb, Zn, TTO, Oil/Grease, Phenols
Mineral Mining and Processing	436	212391, 212393	None
Nonferrous Metals Forming and Metal Powders	471	Various	Sb, Pb, Cr, Zn, F, Ni, Cd, Cu, CN, Ag, Mo, Ammonia
Nonferrous Metal Manufacturing	421	Various	Ni, F, Pb, Zn, As, Cu, Cd, Sb, Hg, Be, Cr, CN, Indium, Se, Mo, Fe, Co, Ag, Au, Ta, Sn, Ti, W, Benzo(a)pyrene, Phenolics, Hexachlorobenzene
Oil and Gas Extraction	435	211111, 211112	None
Ore Mining & Dressing	440	Various	None
Organic Chemicals, Plastics and Synthetic Fibers	414	Various	Multiple Organics, CN, Pb, Zn, TSS and BOD
Paint Formulating	446	325510	No Discharge
Paving and Roofing Materials	443	324121, 324122	Oil/Grease
Pesticide Chemicals Manufacturing and Formulating	455	325320	Subpart A: COD, BOD, TSS, Organic pesticide residue Subpart B and C: No Discharge
Petroleum Refining	419	324110	Oil/Grease, Ammonia, Cr
Pharmaceutical Manufacturing	439	325412	Ammonia, cyanide
Phosphate Manufacturing	422	325180	None
Photographic	459	325992	None
Plastics Molding and Forming	463	326199	None
Porcelain Enameling	466	327110	Cr, Pb, Ni, Zn

Industrial Category	40 CFR	NAICS Code	Regulated Parameters
Pulp, Paper, and Paperboard	430	322130	Pentachlorophenol, Trichlorophenol
Rubber Manufacturing	428	Various	Cr, Pb, Zn, Oil/Grease, COD
Soaps and Detergents Manufacturing	417	325611	None
Steam Electric Power Generating	423	221119	Cu, Cr, Zn and calculation of 126 Organics
Sugar Processing	409	311313, 311314	None
Textile Mills	410	Various	None
Timber Products Processing	429	321211, 321212 321214, 321199	Subpart F: No Discharge Subparts G and H: As, Cu, Cr and Oil/Grease
Transportation Equipment Cleaning	442	488210, 811310	Non-polar material (SGT-HEM), fluoranthene, phenanthrene, Cd, Cr, Cu, Pb, Hg, Ni, Zn

Appendix D. Example RCRA Notification Letter

[Date]

[Name]

[Business]

[Address]

Re: RCRA Hazardous Waste Notification Requirements

Dear [Name]:

The Oregon Department of Environmental Quality (DEQ) and federal regulations (cf., 40 CFR 403.8(f)(2)(iii)), require that [Municipality] notify industries who discharge wastewater to the public sewer system of Resource Conservation and Recovery Action (RCRA) hazardous waste reporting requirements. A summary of the notification requirement follows:

Who Must Notify:

All non-domestic users whose wastewater is treated at [Municipality's] treatment facilities and that discharge listed or characteristic RCRA hazardous waste to the POTW (except as described below) must notify the [Municipality] and other regulatory agencies. RCRA listed and characteristic wastes are described in 40 CFR Part 261.

Who Must Notify:

All non-domestic users whose wastewater is treated at [Municipality's] treatment facilities and that discharge listed or characteristic RCRA hazardous waste to the POTW (except as described below) must notify the [Municipality] and other regulatory agencies. RCRA listed and characteristic wastes are described in 40 CFR Part 261.

Notification Must be Sent to:

- The [Municipality]
- The EPA Regional Waste Management Division Director, and
- Oregon DEQ Hazardous Waste Program

This notification must be submitted in writing for any discharge into the [Municipality's] POTW of any substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261.

Wastes Covered by the Notification:

- Any discharge to the POTW of more than 15 kilograms (kg) (33 lb.) per calendar month of a RCRA hazardous waste, or a discharge of **any** quantity of an acutely hazardous waste identified in 40 CFR 261.30(d) and 261.33(e), must be reported as a **one-time** notification.
- A discharge to the POTW of 15 kg (33 lb.) or less per calendar month of a RCRA hazardous waste need **not** be reported, **except** for acutely hazardous waste identified in 40 CFR 261.30(d) and 261.33(e).
- A subsequent discharge of more than 15 kg (33 lb.) per calendar month, or of any quantity of an acutely hazardous waste, must be reported as a **one-time** notification.

Pollutants already reported under reporting requirements for categorical industrial users in base line monitoring, final and periodic compliance reports are not subject to this notification requirement.

Notification Must Include:

- Name of the hazardous waste as set forth in 40 CFR Part 261.
- EPA hazardous waste number.
- Type of discharge to the sewer (continuous, batch, or other).
- A certification that you have in place a program to reduce the volume and toxicity of hazardous wastes generated to the degree you have determined to be economically practical.

If you discharge more than 100 kilograms (220 lb.) of hazardous waste per calendar month to the POTW, the one-time notification shall also contain the following information to the extent such information is known or readily available:

- An identification of the hazardous constituents contained in the wastes.
- An estimation of the mass and concentration of such constituents in the waste stream discharged during the calendar month in which the one-time report is made.
- An estimation of the mass of constituents in the waste stream expected to be discharged during the twelve months following the notification.

When the Notification Must be Submitted

- No later than 180 days after the discharge of the listed or characteristic hazardous waste.
- In the case of any new regulations under Section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substance as a hazardous waste, you must notify the [Municipality], EPA and the State of Oregon of the discharge of such substance within 90 days of the effective date of such regulations.
- The notification need be submitted only once for each hazardous waste discharged, except when there will be a substantial change in the volume or character of the hazardous waste discharged (generally because of a planned change in your facility operations). In this case, you must notify the [Municipality] in advance.

How to Count the Volume of Hazardous Waste Discharged

If a hazardous waste is mixed with a non-hazardous process or non-process waste stream and the entire mixture is then discharged to the sewer, the volume of the entire waste stream containing hazardous waste is considered hazardous according to the RCRA "mixture rule" in 40 CFR 261.3(a)(2)(iii). The effect of this rule is summarized as follows:

- **Characteristic Wastes:** These wastes are classified as hazardous because they exhibit one of the hazardous characteristics identified in 40 CFR 261.20 – 40 CFR 261.24 (i.e., they are ignitable, corrosive, reactive, or toxic). If these wastes are mixed with non-hazardous materials and the mixture is then discharged to the sewer, the notification must be submitted only if the **entire mixture actually discharged** is more than 15 kg (33 lb.) per calendar month and if the entire mixture discharged still exhibits the characteristic(s).
- **Listed Wastes:** These are wastes that are classified as hazardous pursuant to being listed in 40 CFR 261.30 – 40 CFR 261.33. If these listed wastes are mixed with non-hazardous materials and then discharged to the sewer, the entire waste stream is considered hazardous and a notification must be submitted. Thus, only if the entire waste stream containing the hazardous waste amounted to 15 kg (33 lb.) or less per calendar month, would the above exemption apply.
- **Questionable Wastes:** If you have any doubt about whether a mixture discharged to the sewer is hazardous, or if you do not wish to perform any calculations which may be necessary under the mixture rule (cf., 40 CFR 261.3(a)(2)(iii)) you should submit the one-time notification.

You can complete and submit the following form to comply with the required notification. To report several wastestreams you can make copies of this form.

HAZARDOUS WASTE INFORMATION (use additional sheets if necessary)

Name, address and contact information for business: _____

Name of Waste: _____

EPA Hazardous Waste Number: _____

TYPE OF DISCHARGE:

_____ Continuous _____ Batch _____ Other _____

I certify that I have a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree I have determined to be economically practical.

Signature of Company Representative

Date

If more than 100 Kilograms (220 lbs) of any hazardous waste per calendar month is discharged to the sewer, please include the following items of information for each hazardous waste, to the extent such information is known and readily available:

Name of Constituent	Mass in Wastestream (this month)	Concentration in Wastestream (this month)

If you have any questions, please call me at [Telephone Number] and/or .

USEPA Region 10
Director
Office of Air, Waste & Toxics
USEPA Region 10 AWT-127
1200 6th Avenue
Seattle WA. 98102

Oregon DEQ
Manager
Hazardous Waste Policy & Program Development
Department of Environmental Quality
700 NE Multnomah St. Suite 600
Portland, Oregon 97232

Sincerely,
[Name]
[Title]