

Guidance for Conducting an Industrial User Survey



State of Oregon
Department of
Environmental
Quality

Industrial Pretreatment Program

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What is the Industrial User Survey?

Industrial users of a publically owned treatment works (POTW) can have potential to: cause pass-through or interference of pollutants with the wastewater treatment system's treatment process, cause sludge contamination or pose a safety threat to workers at these systems. The Industrial User Survey is a mechanism by which POTWs identify and locate all industrial users subject to the state's industrial wastewater pretreatment program. Industrial users that are subject to categorical standards are considered Categorical Industrial Users (CIUs). Industrial users that are not CIUs, but have the potential to affect the POTW due to the size of the discharge and nature of the pollutants are considered significant industrial users (SIUs). The survey is used to develop a list of businesses in the POTW's service area that are CIUs or SIUs.

Survey's objective

The survey's objective is to identify any industrial users whose discharge triggers the requirement to develop a pretreatment program. The survey also identifies all industrial users that have potential to cause pass-through or interference of pollutants with the wastewater treatment system's treatment process, cause sludge contamination or pose a safety threat to workers at these systems.

The requirement to identify industrial users subject to pretreatment applies both to National Pollutant Discharge Elimination System and Water Pollution Control Facilities permittees of all sizes.

Who needs to conduct the survey?

NPDES and WPCF permit holders are required to conduct an Industrial User Survey.

How is the survey performed?

Before starting the survey, the POTW should review the legal authority available to them to direct businesses in their jurisdiction, and any contributing jurisdictions, to complete and submit the survey. This authority is usually obtained through the local sewer use ordinance.

Once legal authority is established, POTWs need to develop a list of industrial users through sources such as building permits, business license records, water billing records, sewer connection permits or property tax records. Once this initial list is compiled, the survey is conducted and industrial users are classified based on wastewater discharge characteristics. Complete DEQ guidance on conducting an industrial user survey is at <http://www.deq.state.or.us/wq/pretreatment/docs/guidance/IUSurveyGuidance.pdf>

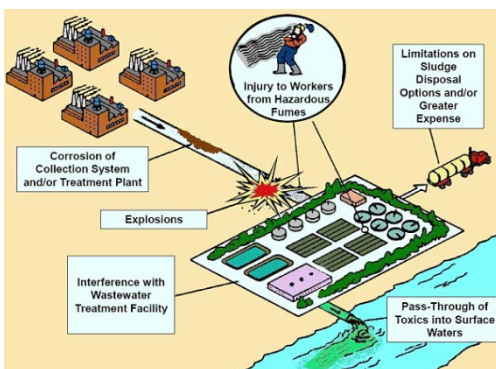
How do I report survey results?

Reporting requirements are identified in the POTW permits. If the POTW facility has already completed a baseline industrial user survey, it should provide survey results to DEQ as specified in the permit.

For Oregon's very small, largely residential permittees, DEQ will accept a letter from cities indicating no industrial dischargers are subject to pretreatment, explaining the basis for the determination. A sample letter attachment is provided at the bottom of next page.

What happens to identified dischargers?

The presence of significant and categorical industrial users discharging wastewater to the publically owned treatment works facility triggers the requirement to develop a local pretreatment program and issue control



Impact of untreated industrial WW discharges.

What are the regulatory requirements?

Chapter 40 of the Code of Federal Regulations, Part 403, requires federal, state and local government, industry and the public to implement national pretreatment standards to protect treatment systems and the public. Oregon DEQ is delegated by EPA to oversee pretreatment programs in the state.

mechanisms. Upon discovering a CIU or SIU, the POTW should contact DEQs Pretreatment Program for assistance.

Additional resources for completing the industrial user survey and program development information are at: <http://www.oracwa.org/cbpt-purpose.html>.

How often is the survey updated?

Once a POTW completes its initial survey, it maintains the survey and makes it available for DEQ inspection. In addition, the treatment works must submit to DEQ an updated survey every five years. Facilities with an approved pretreatment program must update their inventory more frequently. They must also address industrial user survey requirements as specified in the permit.

[Industrial User Survey Sample Letter for Publicly Owned Treatment Works](#)

For information on pretreatment programs, call 503-229-5586, Portland, or call toll-free in Oregon at 1-800-452-4011, ext. 5586. Hearing-impaired persons may call 711.

Alternative formats

Alternative formats of this document can be made available. For more information call 503-229-5696, Portland, or call toll-free in Oregon at 1-800-452-4011, ext. 5696. Hearing-impaired persons may call 711.