



# IU Inventory and Characterization

# Regulatory Background

## 40 CFR 403.8(f)(2)(i-iii)

- i. Identify and locate all possible IUs
  - i. *Develop and maintain an IU inventory*
- ii. Identify the character and volume of pollutants
  - i. *Characterize the IUs on the inventory*
- iii. Notification of IUs of applicable Pretreatment Standards – *IUs and SIUs*

# Regulatory Background

## 40 CFR 403.8(f)(2)(vii)

- “Investigate instances of noncompliance with Pretreatment Standards and Requirements, as indicated in the reports and notices required under §403.12, or indicated by analysis, inspection, and surveillance activities described in this section. Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions.”

# Regulatory Background

## 40 CFR 403.8(f)(6)

- “The POTW shall prepare and maintain a list of its Industrial Users meeting the criteria in §403.3(v)(1).

# Characterization of IUs/SIUs

- Right of Entry Authorization

## Characterization of a facility

- Inspection preparation
- Facility Inspection Process: Information gathering from raw material, chemicals to finished product
- Inspection report and follow-up

# Characterization of IUs/SIUs

- Process Wastewater Discharges
- Slug Discharge Potential

## Process

### Wastestream Management

- Reuse/Recycle
- Haul Off Site
- Treatment
- Discharge
- ??????

### Spill containment measures

Process Line

Chemical Supply

Wastestream Storage

### Wastestream Treatment

Discharge plumbing- process

Chemical Supply transfer

Spent Chemical bath  
management

MSDS

Records Review

# Characterization of IUs/SIUs

- Opening Conference
- Visual Tour of Facility
  - Opportunity to take digital photos of relevant areas
- Records Review
- Closing Conference
- Inspection Report
- Follow Up – Notification

# Pretreatment Standards

- Three-Tiered Approach for “significance” or “need for regulatory control” based on the Pretreatment Standards
- **National General/Specific Prohibitions**
- **National Categorical Regulations**
- **Local Limits**



# Significant Industrial User

## 40 CFR 403.3(v)(1)

- Subject to Federal categorical standards
- Discharges 25,000 gpd or more of process wastewater
- Contributes 5 % or more of hydraulic or organic capacity of the POTW treatment plant
- Has a reasonable potential for adversely affecting the POTW or for violating any standard or requirements
  - *POTW includes Collection System*

# Industrial Waste Survey

- Industrial User Inventory and Characterization
- Notification
- No prescriptive procedures in the General Pretreatment Regulations - 40 CFR Part 403

# Development/Maintenance of the IU inventory

- Characterize the service area
- Coordination with other Local/County depts.
  - Building/Engineering
  - Community Development
  - Fire/Police
  - Code Enforcement



# Challenges with Outside Contributing Jurisdictions

# Procedures for Maintaining IU Inventory

- Develop priority IUs or Sectors
  - Dependent on size of POTW or collection system in service area
- Determine appropriate frequencies for updated information for these priority IUs
- Can outside contributing jurisdictions play a larger role with maintenance of the IU inventory?

# IU Inventory

## Methods and Tools

- **Drive-bys**
- **IWS evaluation**
- **Facility inspections**
- **Industrial Waste Survey**
- **Local telephone directories**
- **Local newspaper**
- **Business journal**
- **Wastewater/water billing records**
- **Sewer permit tap records**
- **Business license records**
- **Property tax records**
- **SARA Title III/EPCRA**
- **Toxic Release Inventory**
- **LEPC**
- **Envirofacts –**  
[www.epa.gov/enviro/index.html](http://www.epa.gov/enviro/index.html)

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**No Pretreatment Requirements**

**Unknown Requirements**

**Pretreatment Requirements**

**Best Buy**

**Keith's Leathers**

**Plastic Widgets, Inc.**

**H<sub>2</sub>O in a Bottle, LLC**

Source(s) of IU Information

Characterize by Name/  
Common Knowledge

Gather More Info  
(survey, phone call, etc.)

Initial Inspection/  
Research Process

Sampling/Monitoring

Maintenance/Check-ups

FOG program

chemical etching

chemical tank cleaning

high BOD

**Burger King**

**Jay's Metals**

**Paul's Trucking**

**Moo Dairy**

retail only

Non-contact cooling water

no pH issues



# Classification of Industrial Users

