

Idaho Pollutant Discharge Elimination System

Industrial User Survey Guidance



**State of Idaho
Department of Environmental Quality
Water Quality Division
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Abbreviations and Acronyms

BOD	biochemical oxygen demand
CIU	categorical industrial user
CWA	Clean Water Act
DEQ	Idaho Department of Environmental Quality
gpd	gallons per day
IPDES	Idaho Pollutant Discharge Elimination System
IU	industrial user
IWS	industrial waste survey
mgd	million gallons per day
NAICS	North American Industry Classification System
POTW	publicly owned treatment works
SIC	Standard Industrial Classification
SIU	significant industrial user

1 Purpose

The Idaho Department of Environmental Quality (DEQ) is providing this guidance to Idaho cities and municipalities that operate publicly owned treatment works (POTW) for direction and assistance in conducting an industrial user (IU) survey within their service area. Federal regulation pretreatment requirements (40 CFR 403.8(f)(2)), incorporated by reference into IDAPA 58.01.25.003.02.x, and Idaho Pollutant Discharge Elimination System (IPDES) permit requirements that pertain to all POTWs (IDAPA 58.01.25.302.12) require POTWs to identify and locate all possible significant IUs (SIUs) discharging process and nonprocess wastewater to the POTW.

POTWs are required to complete an IU survey at least once every permit cycle or each year if the POTW is required to develop, implement, and maintain a pretreatment program. This guidance does not establish any duty or obligation to follow the specified procedures suggested herein, but it will identify the minimum information required to comply with IDAPA 58.01.25.003.02.x.

2 Pretreatment Program

The federal regulation, 40 CFR 403.8(f)(2), requires POTWs to identify and locate all possible IUs subject to the pretreatment program and to identify the volume and character of pollutants discharged to the POTW. The IU Survey in Appendix A may be used to develop a list of all businesses in the POTW's service area that discharge wastewater that is not "domestic sewage." Identifying and documenting this information is important for future reference as a company increases its production, develops new products or services that may employ a process that results in the company's reclassification as a categorical IU (CIU), or causes an increase in discharge volume or nutrient load that results in reclassification as an SIU.

Additionally, specific information about the pollutants present or believed to be present in the wastewater must be collected to determine the following:

- The IU's impact, whether hydraulic, nutrient, or toxic, on the POTW's operation can be assessed (40 CFR 403.8(f)(2)(ii));
- Specific pretreatment processes required to minimize the discharged pollutant's impact on the POTW's operation can be identified and installed (40 CFR 403.12(b)(3)); and
- Whether the IU is an insignificant discharger, liberating the company from installing pretreatment technology (40 CFR 403.3(v)(2)).

This information will establish the basis that a POTW will develop its pretreatment program if DEQ determines the POTW must develop one to safeguard the POTW from violating its IPDES permit. This information will identify those IUs that must install pretreatment processes. These actions will provide assurance that the POTW's discharge complies with the IPDES permit and does not violate receiving water body requirements.

2.1 Industrial User Survey Procedures

This guidance provides a protocol for designing, implementing, and documenting an IU survey. The following are the goals of the survey effort:

- To identify and characterize wastewaters discharged by IUs that may impact a POTW's operations; and
- To identify and document the base information necessary for determining how to control these IU discharges.

Reading and understanding this guidance and discussing survey requirements with DEQ will help establish a basic understanding of the need for and the end result of an IU survey. Talking to other city and municipality (POTWs) contacts, possibly those who have already performed IU surveys, may provide useful information in executing a successful IU survey.

Before initiating an IU survey, review the legal authorities available to you to compel businesses in your jurisdiction and any contributing jurisdictions to complete and submit the survey. Review local sewer ordinances to identify the requirements for businesses to obtain public sewer access. These ordinances should also specify an escalating enforcement response for noncompliance, including failure to respond to an IU survey. If the ordinances are found to be inadequate, initiate ordinance changes to support a successful IU survey.

An IU survey comprises five major activities:

1. Compiling an initial master list of potential IUs 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; and
5. Performing ongoing surveys to maintain an accurate listing of IUs, as well as new, expanding, and evolving company activities.

2.2 Compile a Master List of Industrial Users

To identify SIUs and CIUs in the POTW's service area, a comprehensive master list must first be developed. This list includes all dischargers or potential dischargers of nondomestic wastewater to the POTW. Nondomestic wastewater originates from industrial sources and does not include septage or domestic wastewater (municipal wastewater). A template detailing the minimum required data to collect is provided in Appendix B.

Multiple sources of information can be used to identify these businesses:

- Water utility billing records (useful for determining daily consumption rate)
- Business license records
- Geographic information system data 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, and semiconductor)
- Property tax records
- Fire department emergency management plans and records

A list compiled from these sources provides a good starting point for a master list. If your POTW receives wastewater from other jurisdictions, work with those contributing jurisdictions to identify the IUs discharging wastewater to your POTW. This master list should include the following, at a minimum:

- Business name
- Address
- Contact person to send the survey to, if known
- The four primary Standard Industrial Classification (SIC) codes or alternatively the four primary North American Industry Classification System (NAICS) codes
- Any additional information initially available related to the industrial processes and wastewater discharges

Finally, a master list provides a baseline of industries discharging wastewater to the POTW and will need to be periodically updated. As companies increase their sales, add product lines, and expand their operations, increases in wastewater are likely as well as increases in the diversity of pollutants that are discharged to the POTW. The master list provides the city or municipality a comprehensive list of companies that will need to be assessed as their operations grow. Some companies may be exempt from participating in the POTW's pretreatment program when they are initially assessed but may expand their operations over the years, ultimately crossing the threshold for participation in the pretreatment program. More information on tracking companies on the master list is found in Section 2.7, Ongoing Survey Efforts.

With the master list completed, the POTW can begin eliminating IUs from the list and send a survey to the remaining users.

2.3 Survey Industrial Users

After compiling an initial master list, gathering data from each IU will allow the POTW to determine whether the IU is subject to pretreatment standards. This information may be gathered by using survey questionnaires, telephone calls, or visiting the facility. Some information may already be on file at the POTW. If your POTW has a small service area and very few industries, visit these industries. A POTW can also sponsor a workshop to distribute and explain survey questionnaires to its IUs. POTWs with current industrial information may find it feasible to eliminate particular industries or groups of industries from survey efforts for the following:

- Does not generate wastewater (i.e., dry manufacturing processes)
- Has its own NPDES or IPDES permit to discharge to a receiving surface water (i.e., a direct discharger)
- Discharges nondomestic (nonindustrial) wastewater only (e.g., beauty shops, barber shops, retail stores, and offices)

- Does not contribute to problems in the collection system or the POTW involving oil and grease or other discharged substances (e.g., multifamily housing units and offices)

Reliable, verifiable information should be obtained to eliminate any industry from the list. The criteria for eliminating the industry should be valid (e.g., industry generates domestic wastewater only) and documented in the POTW portion of the returned survey. This IU information must be submitted to DEQ to assess whether (a) your city or municipality must establish a pretreatment program, (b) identified dischargers qualify for an exemption from participating, and (c) small dischargers may qualify due to their use of a specific production process. This information will help safeguard the city's or municipality's POTW from violating their IPDES permit and subjecting the city or municipality to potential penalties. Appendix C provides an example form that can be used to document information justifying each industry's elimination from further survey efforts.

In developing the IU survey, ensure that it is easy to read and understand and that the purpose and use of the collected information is fully explained in the cover letter. A cover letter template is provided in Appendix D.

Cities or municipalities may conduct an initial survey with fewer questions (shorter form) to identify those industries for which they will collect additional industrial process/wastewater information. This short form should collect specific information that will allow the city or municipality to characterize and determine which industries may be subject to pretreatment requirements. After the canvassed industries have been identified, this smaller set of industries will be asked to complete a more detailed survey that identifies specific manufacturing processes, chemicals used, anticipated discharge concentrations, and other information necessary to assess pretreatment requirements for each industry.

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

DEQ recommends sending a letter to accompany the survey that explains the purpose of the local pretreatment program and IU survey, and describes how survey data will be used. The letter should clearly state the deadline for completing and returning the survey. The letter should also state that the requested information is required under the Clean Water Act (CWA) and IDAPA 58.01.25 and identify the consequences of failing to submit a completed survey. Include the name and telephone number of a municipal official who can be contacted if the industries have questions about the survey.

The city or municipality may wish to use several actions that may increase the initial response rate:

- 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, preaddressed envelope for returning the completed survey, or label the form so 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.

The POTW should include an envelope with the appropriate return address or provide an email address in the cover letter to which the user can forward their scanned survey results.

2.4 Conduct Follow-Up Activities

As survey responses are gathered, they should be reviewed for completeness and accuracy. Track receipt of surveys to identify those businesses requiring follow-up actions using the master list template in Appendix B.

For businesses that do not respond by the deadline, the POTW should undertake follow-up activities. These activities may include sending reminder letters or postcards, making telephone calls, or visiting the site (reconnaissance inspection). One month should be sufficient for the company to receive, complete, and return the survey.

The amount of time needed for follow-up activities will vary according to the number of businesses surveyed. The POTW’s program submission to DEQ should describe the follow-up measures used and list any IUs that ultimately did not respond. The city’s or municipality’s ordinances should authorize the POTW to compel the industry to comply with survey submittal or face potential sewer disconnection.

2.5 Summarize Survey Results

The survey’s purpose is to generate a list of the industries discharging to the POTW; the list will contain the type and number of IUs and quantities of specific pollutants discharged to the POTW. Toxic chemicals are of particular concern because they may upset the POTW’s operations resulting in an illegal discharge for which the city or municipality will be liable. Staff must summarize this information into a manageable document and send it to DEQ’s pretreatment coordinator.

Summarizing the surveys provides an opportunity for staff to assess the individual industries and categorize each as an SIU, CIU, or nonsignificant IU. These decisions will form the basis for determining whether the POTW must develop a pretreatment program.

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. The data collected in the initial and follow-up surveys will support the POTW in identifying pollutants of concern and developing site-specific local limits.

When developing an electronic spreadsheet for IUs discharging to the POTW, the information compiled should include the following:

- Company name, address, contact person and title, and phone number

- Type of business, products manufactured or assembled, and individual processes
- Four primary industry-specific NAICS or SIC codes associated with the site activity
- 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

This survey summary should list only those industries that discharge nondomestic industrial wastewater to the POTW.

2.5.1 Classification of Industrial Users

The industrial waste survey (IWS) is used to identify and locate all possible IUs subject to the POTW pretreatment program. Classifying IUs is essential to determine whether developing a local pretreatment program is required or advisable. The federal pretreatment regulations (40 CFR 403.3) establish the following classifications of IUs:

- **Significant Industrial Users**—SIUs must be regulated with an individual control mechanism, such as an industrial wastewater discharge permit. An SIU is defined as follows:
 - Is subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N. All CIUs are also considered SIUs.
 - Discharges process wastewater of 25,000 gallons per day (gpd) (0.025 million gallons per day [mgd]) or more or whose discharge makes up 5% or more of the average dry weather hydraulic capacity of the treatment plant. Noncontact cooling water, cooling tower, and boiler blow down water is excluded if these do not contain pollutants of concern (e.g., phosphorus-bearing descaling agents).
 - Contributes a nondomestic waste stream that makes up 5% or more of the average dry weather organic capacity (typically biochemical oxygen demand [BOD]) of the treatment plant. Industrial bakeries, food processors, and bottlers (e.g., dairy products and beverages) can discharge high levels of BOD.
 - Has a reasonable potential to adversely affect the POTW 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).
- **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 United States Environmental Protection Agency has established pretreatment standards, then the industry is classified as a CIU and must be regulated by the POTW through an approved pretreatment program.

Identifying industries with categorical processes can be the most difficult part of conducting an IU survey because it requires the POTW to understand the industrial processes used to manufacture a product. For example, a fictitious company named RotorAir manufactures helicopter parts. Manufacturing helicopter parts is, by itself, not a categorical process. However, the facility has a subprocess that electroplates chrome onto one part, and rinse water from the plating process discharges to the POTW.

Electroplating, is a categorical process, making this discharger a CIU under 40 CFR 413, Subpart A – Electroplating of Common Metals.

- **IUs with potential to adversely affect a POTW’s operations**—Examples of waste streams that may pose a reasonable potential to adversely affect a POTW are provided below.
 - *Metal containing waste streams* can inhibit bacterial efficacy or pass through into the receiving stream, resulting in the POTW violating their discharge permit or 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, but are not limited to the following:

• Cadmium	• Lead	• Selenium
• Chromium	• Mercury	• Silver
• Copper	• Molybdenum	• Zinc
• Iron	• Nickel	
 - *Organic chemicals in sufficient quantities* inhibit the treatment process or pass through to the receiving water. Compounds include acetone, benzene, chloroform, phenol, toluene, xylene, tetrachloroethylene, and any type of biocide. Some organic compounds (e.g., ethylene or propylene glycol [antifreeze], isopropyl alcohol, acetic acid, and acetate) can overload the treatment plant with BOD. 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, and lye) can damage the POTW and endanger worker welfare.
- **Other IUs**—Track other IUs, such as small industries and some commercial users (e.g., restaurants, auto repair shops, and dental facilities), 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 local concern exists about these discharges and the sewer use ordinance provides the authority to do so.

2.5.2 Industrial User Survey Data Management

To adequately document the IU survey and assist DEQ in reviewing the pretreatment program submission, the POTW should submit the following information:

- Sources used to compile a comprehensive master list of IUs in the POTW’s service area
- Methods used for the survey (e.g., questionnaire, site visit, or telephone)
- Copy of the survey and the letter sent to the industries including dates the forms were sent
- 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)

- Master list of all industries discharging to the POTW (the following two items can appear either separately or together as a master list):
 - Indicates which businesses 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, the concentrations of these pollutants should also be presented.

2.6 Determine Whether Local Pretreatment Program is Needed or Required

The IU survey should identify sources that 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 POTWs with a dry weather capacity of 5 mgd or more (the minimum design flow that triggers pretreatment requirements), the presence of any SIU/CIU will trigger the need to develop a local pretreatment program. For POTWs with less than a 5 mgd dry weather capacity, the presence of a CIU discharging to the POTW would trigger the need to develop a pretreatment program. IDAPA 58.01.25 specifically delegates the responsibility for developing a pretreatment program and issuing control mechanisms to CIUs and SIUs to the city or municipality.

A POTW may also be required to develop a pretreatment program if a history of compliance issues exist related to industrial discharges. The IU survey provides valuable information for local POTWs in managing discharges and protecting sanitary conveyance and treatment plant operations. The POTW may discover sources whose discharge, individually (or collectively), could impact the treatment plant's operation. 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 collection system before requiring a pretreatment program. A city or municipality that has developed appropriate ordinances and established a pretreatment program before needing one is strategically positioned to immediately authorize new or expanding industries to discharge to the POTW. This position may encourage businesses to establish new operations in the POTW's service area.

2.7 Ongoing Survey Efforts

After establishing a master list of IUs, the POTW will need to institute an ongoing survey effort to identify new IUs, or existing exempt IUs that become SIUs. Maintaining this list may help the POTW identify potential SIUs before they begin discharging process wastewater.

Different methods are available to identify new IUs, and a comprehensive ongoing effort should incorporate more than one method. Methodologies used depend on the resources available to the

POTW. Efficient survey efforts may incorporate information from other utility or municipality processes. Examples of potential resources include, but are not limited to the following:

- Business licenses
 - Incorporate the IU survey as part of the business license process. 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 sewer customers 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, and 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 the local DEQ hazardous waste contact to find businesses reporting hazardous waste generation.
- Industrial parks—conduct periodic windshield surveys of industrial parks in your jurisdiction to identify new tenants, and send out an IU survey with a letter after potential IUs are identified.

When Is It Appropriate to Resurvey?

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 (40 CFR 403.12(h)(i)). POTWs without a pretreatment program are required to submit an update to their IU survey with their IPDES 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. By implementing a thorough initial and continuous ongoing survey process, the POTW may avoid repeating a baseline survey.

Appendix A. Industrial User Survey

Include the information provided below at minimum. New rows can be added as needed to capture more information the POTW deems necessary.

Company Name:	<i>Discharger Name</i>		
Authorized Official:	<i>Name, Title, Telephone</i>		
Company Address:	<i>1234 Main St., City, State Zip Code</i>		
Production Facility Address:	<i>1234 Main St., City, State Zip Code</i>		
Operator Phone:	<i>123.456.7890</i>		
Top 4 SIC or NAICS codes in order of priority from major to minor products:	<i>1021, 2796, 2819, 2879</i>		
List the products the facility manufactures:			
List the raw materials and process additives used:			
Indicate the types of waste generated by this facility:	<input type="checkbox"/> Domestic waste	<input type="checkbox"/> Noncontact cooling	<input type="checkbox"/> Boiler/tower blowdown
	<input type="checkbox"/> Process	<input type="checkbox"/> Washdown	<input type="checkbox"/> Air pollution control
			<input type="checkbox"/> Contact cooling water
			<input type="checkbox"/> Storm water runoff
Indicate where waste is discharged:	<input type="checkbox"/> Sanitary sewer	<input type="checkbox"/> Storm sewer	<input type="checkbox"/> Surface water
	<input type="checkbox"/> Ground water	<input type="checkbox"/> Waste hauler	<input type="checkbox"/> Evaporation
What are the maximum and average daily flows discharged from this facility (gallons per day)?			
What is the average nutrient load at this facility (pounds per day)?			
List pollutants discharged by this facility:			
Describe any existing pretreatment technology:			
Does the facility perform processes in any of the industrial categories or business activities listed below?			

<input type="checkbox"/> Airport Deicing	<input type="checkbox"/> Leather Tanning and Finishing
<input type="checkbox"/> Aluminum Forming	<input type="checkbox"/> Meat and Poultry Products
<input type="checkbox"/> Asbestos Manufacturing	<input type="checkbox"/> Metal Finishing
<input type="checkbox"/> Battery Manufacturing	<input type="checkbox"/> Metal Molding and Casting
<input type="checkbox"/> Canned and Preserved Fruits and Vegetables	<input type="checkbox"/> Metal Products and Machinery
<input type="checkbox"/> Canned and Preserved Seafood	<input type="checkbox"/> Mineral Mining and Processing
<input type="checkbox"/> Carbon Black Manufacturing	<input type="checkbox"/> Nonferrous Metals Forming and Metal Powders
<input type="checkbox"/> Cement Manufacturing	<input type="checkbox"/> Nonferrous Metals Manufacturing
<input type="checkbox"/> Centralized Waste Treatment	<input type="checkbox"/> Oil and Gas Extraction
<input type="checkbox"/> Coal Mining	<input type="checkbox"/> Ore Mining and Dressing
<input type="checkbox"/> Coil Coating	<input type="checkbox"/> Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF)
<input type="checkbox"/> Concentrated Animal Feed Operations (CAFO)	<input type="checkbox"/> Paint Formulating
<input type="checkbox"/> Concentrated Aquatic Animal Production (CAAP)	<input type="checkbox"/> Paving and Roofing Materials (Tars and Asphalt)
<input type="checkbox"/> Construction and Development	<input type="checkbox"/> Pesticide Chemicals
<input type="checkbox"/> Copper Forming	<input type="checkbox"/> Petroleum Refining
<input type="checkbox"/> Dairy Products Processing	<input type="checkbox"/> Pharmaceutical Manufacturing
<input type="checkbox"/> Electrical and Electronic Components	<input type="checkbox"/> Phosphate Manufacturing
<input type="checkbox"/> Electroplating	<input type="checkbox"/> Photographic Processing
<input type="checkbox"/> Explosives Manufacturing	<input type="checkbox"/> Porcelain Enameling
<input type="checkbox"/> Ferroalloy Manufacturing	<input type="checkbox"/> Pulp, Paper, and Paperboard
<input type="checkbox"/> Fertilizer Manufacturing	<input type="checkbox"/> Rubber Manufacturing
<input type="checkbox"/> Glass Manufacturing	<input type="checkbox"/> Soap and Detergent Manufacturing
<input type="checkbox"/> Grain Mills	<input type="checkbox"/> Steam Electric Power Generating
<input type="checkbox"/> Gum and Wood Chemicals Manufacturing	<input type="checkbox"/> Sugar Processing
<input type="checkbox"/> Hospitals	<input type="checkbox"/> Textile Mills
<input type="checkbox"/> Ink Formulating	<input type="checkbox"/> Timber Products Processing
<input type="checkbox"/> Inorganic Chemicals Manufacturing	<input type="checkbox"/> Transportation Equipment Cleaning
<input type="checkbox"/> Iron and Steel Manufacturing	<input type="checkbox"/> Waste Combustors
<input type="checkbox"/> Landfills	
Indicate whether any of the following chemicals are used in your facility:	

LEGEND:

Leave blank if Status is Absent

Mark "S" if Status is Suspected Absent

Mark "P" if Status is Present

Mark "M" if Status is Suspected Present

<u>Chemical Compound</u>	<u>Status</u>		<u>Chemical Compound</u>	<u>Status</u>
ACENAPHTHENE			ACENAPHTHYLENE	
ACROLEIN			ACRYLONITRILE	
ALDRIN			ALPHA-ENDOSULFAN	
ALPHA-LINDANE			ANTHRACENE	
ANTIMONY			AROCLOR 1016	
AROCLOR 1221			AROCLOR 1232	
AROCLOR 1242			AROCLOR 1248	
AROCLOR 1254			AROCLOR 1260	
ARSENIC			ASBESTOS (FRIABLE)	
BENZ(A)ANTHRACENE			BENZENE	
BENZIDINE			BENZO(A)PYRENE	
BENZO(B)FLUORANTHENE			BENZO(GHI)PERYLENE	
BENZO(K)FLUORANTHENE			BENZYL BUTYL PHTHALATE	
BERYLLIUM			BETA-ENDOSULFAN	
BETA-LINDANE			BIS(2-CHLORO-1-METHYLETHYL) ETHER	
BIS(2- CHLOROETHOXY)METHANE			BIS(2-CHLOROETHYL) ETHER	
BIS(2-CHLOROISOPROPYL) ETHER			BIS(2-ETHYLHEXYL)PHTHALATE	
BIS(CHLOROMETHYL) ETHER			4-BROMOPHENYL PHENYL ETHER	
CADMIUM			CAMPHECHLOR	
CARBON TETRACHLORIDE			4-CHLOR-M-CRESOL	
CHLORDANE			CHLOROBENZENE	
CHLORODIBROMOMETHANE			CHLOROETHANE	
2-CHLOROETHYL VINYL ETHER			CHLOROFORM	
CHLOROMETHANE			2-CHLORONAPHTHALENE	
2-CHLOROPHENOL			4-CHLOROPHENYL PHENYL ETHER	
CHROMIUM			CHRYSENE	
COPPER			CYANIDE	

DDD		DDE	
DDT		DELTA-LINDANE	
DI-N-OCTYL PHTHALATE		DI-N-PROPYLNITROSAMINE	
DIBENZ(A,H)ANTHRACENE		1,2-DIBROMOETHANE	
DIBUTYL PHTHALATE		1,4-DICHLOROENZENE	
1,2-DICHLOROENZENE		1,3-DICHLOROENZENE	
3,3'-DICHLOROENZIDINE		DICHLOROBROMOMETHANE	
1,2-DICHLOROETHANE		1,1-DICHLOROETHANE	
1,1-DICHLOROETHYLENE		DICHLOROMETHANE	
2,4-DICHLOROPHENOL		1,2-DICHLOROPROPANE	
1,3-DICHLOROPROPENE (MIXED ISOMERS)		DIELDRIN	
DIETHYL PHTHALATE		DIMETHYL PHTHALATE	
2,4-DIMETHYLPHENOL		4,6-DINITRO-O-CRESOL	
2,4-DINITROPHENOL		2,4-DINITROTOLUENE	
2,6-DINITROTOLUENE		1,2-DIPHENYLHYDRAZINE	
ENDOSULFAN SULFATE		ENDRIN	
ENDRIN ALDEHYDE		ETHYLBENZENE	
FLUORANTHENE		FLUORENE	
GAMMA-LINDANE		HEPTACHLOR	
HEPTACHLOR EPOXIDE		HEXACHLORO-1,3-BUTADIENE	
HEXACHLOROENZENE		HEXACHLOROCYCLOPENTADIENE	
HEXACHLOROETHANE		INDENO(1,2,3-CD)PYRENE	
ISOPHORONE		LEAD	
MERCURY		METHANAMINE, N-METHYL-N-NITROSO	
METHYL BROMIDE		N-NITROSODIPHENYLAMINE	
NAPHTHALENE		NICKEL	
NITROENZENE		4-NITROPHENOL	
2-NITROPHENOL		PENTACHLOROPHENOL	
PHENANTHRENE		PHENOL	
PYRENE		SELENIUM	
SILVER		2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN (TCDD)	
1,1,2,2-TETRACHLOROETHANE		TETRACHLOROETHYLENE	

2,3,4,6-TETRACHLOROPHENOL		THALLIUM	
TOLUENE		1,2-TRANS-DICHLOROETHYLENE	
TRIBROMOMETHANE		1,2,4-TRICHLOROBENZENE	
1,1,2-TRICHLOROETHANE		1,1,1-TRICHLOROETHANE	
TRICHLOROETHYLENE		2,4,6-TRICHLOROPHENOL	
VINYL CHLORIDE		ZINC	
<p>In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information provided in this questionnaire will be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR 2.</p> <p>"I have personally examined and am familiar with the information submitted in this document. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment."</p>			
Signature			
Date			

Appendix B. Master List

Insert as many rows as needed to accommodate the entire master list. Columns may be added as needed to track additional information.

Company Name and Address	Survey Sent Date	Survey Sent to	Survey Completion Date¹	If survey was not returned, actions taken
<i>Discharger Name 1234 Main St., City, State Zip Code</i>	<i>01/01/2022</i>	<i>Mr. Discharger</i>	<i>02/02/2022</i>	
<i>Discharger Name 1234 Main St., City, State Zip Code</i>	<i>01/01/2022</i>	<i>Mr. Discharger</i>		<i>Visited facility, phoned official, etc.</i>

¹ The survey is complete when it has been submitted to the POTW with sufficient information to characterize the industry and its effluent.

Appendix C. Eliminated Industrial Users

Include the information provided below at minimum. New rows can be added as needed to capture more information the POTW deems necessary. The table below should be copied as many times as needed to cover all eliminated IUs.

Municipality/POTW Name:	<i>City POTW</i>
Company Name:	<i>Discharger Name</i>
Facility Address:	<i>1234 Main St., City, State Zip Code</i>
Operator Phone:	<i>123.456.7890</i>
Describe the justification for eliminating the IU from further survey efforts	<i>Does not discharge, or other sufficiently supported reason for elimination from being classified as an SIU/CIU.</i>

Appendix D. Cover Letter

This letter should be typed on letterhead associated with the POTW or municipality.

Company Name or Customer Name
Address
City, State Zip Code

Subject: Mandatory Survey of Commercial and Industrial Sewer Customers

Dear [Customer],

We are engaging in a study to determine the nature of the wastewater discharged by our customers. This study, called an Industrial Waste Survey (IWS), is performed periodically during the course of our [IPDES] permit cycle to ensure the safe operation of our wastewater treatment plant (WWTP) and maintain compliance with our discharge permit. The results of the survey will be sent to the Idaho Department of Environmental Quality (DEQ) for review to determine whether the WWTP must develop a pretreatment program.

Enclosed you will find the IWS, which requests details about your facility's operations, materials, and production processes. We request that the survey be returned to [*the address on the enclosed envelope OR email address*] by [*date, one month from mailing*].

Completion of this survey is required under the Clean Water Act (CWA) and the Rules Regulating the Idaho Pollutant Discharge Elimination System Program (IDAPA 58.01.25) [*insert sewer use ordinance if applicable*]. Failure to complete this survey or falsifying information reported on the survey is [*insert enforcement information authorized by sewer ordinance, i.e., "an offense punishable by enforcement action, which includes termination of treatment services and/or civil and criminal penalties"*].

If you have questions or concerns, please contact [*Municipal Official*], [*Title*], [*Phone Number*].

Sincerely,

[Signature Block]