# Characterizing Your Service Area

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#### **EPA/State Audits**

Pretreatment Program Requirements (40 CFR 403.8(f))

- (1) Legal Authority
- (2) Procedures
- (3) Funding
- (4) Local Limits
- (5) Enforcement Response Plan (ERP)
- (6) List of CIUs and SIU Characterization

#### **Characterizing Your Service Area**

#### • 40 CFR 403.8(f)(2): Procedures

- (i) Identify and locate all Industrial Users (IUs) that might be subject to your pretreatment program
- (ii) Identify the character and volume of pollutants discharged by IUs to POTW
- (iii) Notify IUs of applicable pretreatment requirements
- 40 CFR 403.8(f)(6): List of CIUs and SIUs

How could you document or keep track of IU inventory and characterization for an audit?

#### Find the Industrial Users

- Flo's Flowers
- Mama's Sugar Factory
- Riverside Apartments
- Best Buy
- Denny's
- Dr. Nick Riviera
- Johnson Residence

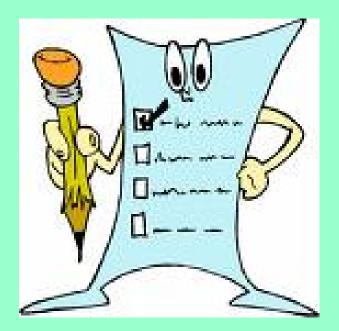


### Group Work

- 1. Where could you get your list of IUs? Make a list of sources and pick which ones will work best for your service area. What problems might arise with your information/sources?
- How could you gather information about your list of IUs? Which method would work best?
- 3. How could you manage/track the information you gather? How could you track the whole process?
- 4. When should you conduct an inspection?
- 5. How do you upkeep your inventory? What about the businesses moving in and out of your service area from time to time?

### Industrial Waste Survey

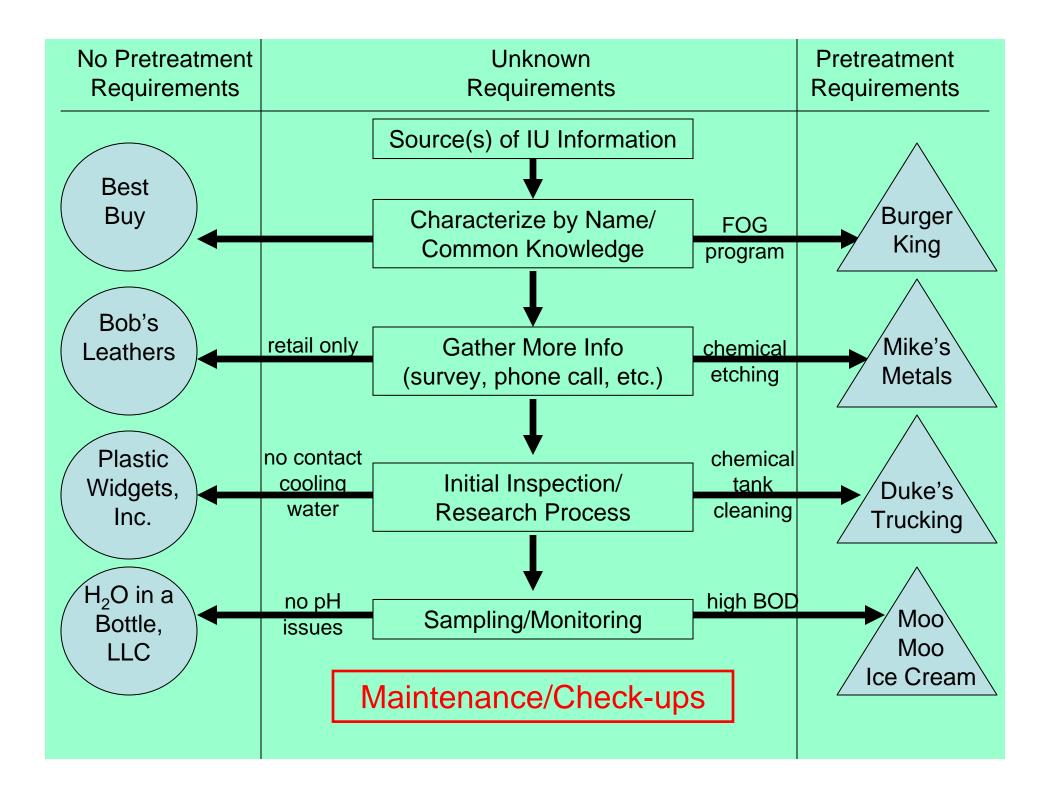
• What do you need to include?



## **Initial Inspection**

• How do you document it for your auditor?





### **Common Audit Deficiencies**

- No source of industrial users/ no networking with other departments
- No follow through, surveys that need an inspection sit in a file
- Initial inspections are not part of standard operating procedures
- Inadequate investigation for SIU potential
- Inventory is out of date/ no maintenance



#### Take Home

- There is no one right way.
- Characterizing your service area takes time and money.
- Don't fail on the follow through. Every IU needs to be categorized and documented for your auditor.
- Keep up with it. Maintenance, maintenance, maintenance.