Industrial User Inventory and Characterization Procedures

Prohibited Discharges

If at any time during the Industrial User Inventory and Characterization Procedures a prohibited discharge of a pollutant that may or is causing imminent endangerment to human health, welfare or to the environment the Pre-Treatment Coordinator will exercise their emergency authority to halt or prevent such discharge in accordance with the City of Helena's Industrial Waste Regulations and Emergency Response Plan.

New business Inventory Review

- Obtain ~~monthly annually~~semi-annually a list of all new businesses in the City of Helena from the building licensing office.
- Review the monthly~~annual~~ new businesses list for business names that discharge any wastewater other than domestic wastewater to the Wastewater Treatment Plant (WWTP) and may be a Significant Industrial User (SIU).
- Mail an Industrial Waste Survey form to each of the potential SIU businesses and track responses (See attachment 1- Industrial Waste Survey).
- Perform a site inspection to review the potential SIU business's wastewater discharge operations for any response received that discharges wastewater other than domestic water.
- Review the information obtained, meet with the Pre-treatment team and decide if that business needs to be permitted or not based on Title 6, Chapter 4 of Helena City Code, Industrial Wastewater Regulations.
- When information is received concerning an industrial or commercial user it needs to be entered into the industrial waste inventory database along with the classification for the industrial or commercial user (SIU, CIU, dental amalgam facility, oil and grease, etc.).
- Identify and perform the necessary permitting process. ~~in conjunction with EPA review and approval.~~
- Notify Industrial Users of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act. Notification methods will include follow up letters to inspections or survey reviews or providing a copy of the inspection report to the Industrial User.

Commented [LE1]: Obtaining the list once a year might not be sufficient. The previous industrial waste survey procedures required that "Every week the Building Dept sends a report listing the building permits that were applied for. When reviewing that list you find a new business or a change in a business that you want further clarification on you go to the Building Dept. and pull the set of plans. For example; If there is a auto shop going in you can see if there are water/oil separators etc. This will give you a heads up that you may want to go in and inspect the building after it's completed or at least send screening and/or survey forms to the owners in advance.

On the AS400 you can pull a report for any business licenses that were issued for any given month. This is helpful when a building may be used as a daycare at one time and then without changing ownership it may become a dental office."

Commented [MC2R1]: Semi-Annually or annually is sufficient unless there is a specific timeframe in the regulations. The City has a review process such that any new development or business must submit building plans for review. The various departments and divisions within the City including Wastewater and Engineering receive and review building permit applications.

Commented [LE3]: What criteria will be used to determine if an industrial user permit is needed?
The IWS procedure provided to EPA during the 2017 Audit indicated the following criteria would require a permit:

- Anything that is addressed in the Prohibited Substances in the Ordinances.
- The discharge must be able to meet the local limits for heavy metals set in the Ordinances.
- A business that discharges 25,000 gallons or more a day of process wastewater is considered to be a significant industrial user.
- If the business is "Categorical" they would require a permit no matter how small of a generator they may be.
- The discharge needs to meet the limits set in the Ordinances for BOD, TSS, Oil/grease, Benzene and BTEX.

Commented [LE4]: How will the POTW notify the industrial users of their requirements?

The 2017 Audit found that the City's industrial waste survey procedure did not address the regulatory obligation to notify Industrial Users of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act. As identified in the 2017 audit, the City's IU inventory procedure needs to include a notification component for IUs in the service area; this can be accomplished by a variety of methods, including but not limited to, follow up letters to inspections or survey reviews,
providing a copy of the inspection report to the IU, etc.

Existing Business Inspections

Pre-treatment Coordinator or designated Pre-treatment Program personnel will make observations when they are driving around the City of Helena for businesses that may be discharging wastewater other than domestic wastewater.

Fire Marshal will notify the Pre-treatment Coordinator if, during their existing business inspections, they see any business that has stored chemicals and they have reason to believe the business may be discharging chemicals to the sanitary sewer system.

The Utility Maintenance Division inspects approximately 20% of the City of Helena sanitary sewer system mainline annually by video recording. During mainline inspections, the Utility Maintenance personnel will observe all sanitary sewer connections for grease, roots and chemical flow or staining. When grease is encountered the Utility Maintenance personnel contact the business and require maintenance to be completed on the grease trap or installation of required grease trap equipment. When chemical staining or flow is encountered, Utility Maintenance personnel will notify the Pre-treatment Coordinator immediately.

If any business is identified as discharging chemicals or wastewater other than domestic wastewater to the sanitary sewer system, the Pre-treatment coordinator will perform the following:

- Visit the business and deliver a Waste Survey form (See attachment 1 - Industrial Waste Survey).
- Review observations and response to waste survey form.
- Perform a site inspection to review the business's wastewater discharge operations of any response received that the business discharges wastewater other than domestic water.
- Review the information obtained, meet with Pre-treatment team and decide if that business needs to be permitted or not based on Title 6, Chapter 4 of Helena City Code, Industrial Wastewater Regulations.
- When information is received concerning an industrial or commercial user it needs to be entered into the industrial waste inventory database along with the classification for the industrial or commercial user (SIU, CIU, dental amalgam facility, oil and grease, etc.).
- Identify and perform the necessary permitting process ~~in conjunction with EPA review and approval~~.

Commented [LE5]: What criteria will be used to determine if an industrial user permit is needed?
The IWS procedure provided to EPA during the 2017 Audit indicated the following criteria would require a permit:
- Anything that is addressed in the Prohibited Substances in the Ordinances.
- The discharge must be able to meet the local limits for heavy metals set in the Ordinances.
- A business that discharges 25,000 gallons or more a day of process wastewater is considered to be a significant industrial user.
- If the business is "Categorical" they would require a permit no matter how small of a generator they may be.
- The discharge needs to meet the limits set in the Ordinances for BOD, TSS, Oil/grease, Benzene and BTEX.

- Notify Industrial Users of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act. Notification methods will include follow up letters to inspections or survey reviews or providing a copy of the inspection report to the Industrial User.

Commented [LE6]: How will the POTW notify the industrial users of their requirements?

The 2017 Audit found that the City's industrial waste survey procedure did not address the regulatory obligation to notify Industrial Users of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act. As identified in the 2017 audit, the City's IU inventory procedure needs to include a notification component for IUs in the service area; this can be accomplished by a variety of methods, including but not limited to, follow up letters to inspections or survey reviews,
providing a copy of the inspection report to the IU, etc.

Attachment 1 – Industrial Waste Survey

Commented [LE7]: include copy of industrial waste survey

Also please see comments on the industrial waste survey.