

Q & A Panel

Question No. 1

Does upgrading the pretreatment system of an electroplating operation with just a pH adjusting system, move them into the metal finishing category?

All they do is aluminum anodizing. . .

Question No. 2

How long should a control authority maintain a CIUs baseline monitoring report and 90-day compliance report?

Question No. 3

When should an industrial user report a slug discharge to the control authority? Specifically -- if an industrial user spills product or chemical onto the manufacturing floor but the industry believes the pretreatment system can handle the “load” and comply with their control document should they still report?

Question No. 4

In what scenarios would the panel suggest using mass based limits in lieu of concentration based limits?

Question No. 5

Should an industrial user treat their wastewater to just meet the local limits; or other applicable limits; or to the extent practical and possible?

Question No. 6

How often should a control authority be sampling a CIU?

Question No. 7

When should a POTW update their local limits?

Question No. 8

- Should SIUs be inspected around the same time every year?

Question No. 9

- What is the general rule of thumb in accepting gifts, favors, lunches, or any other benefits from industrial users? Example: is it OK to accept coffee from a industrial user representative during an inspection?

Question No. 10

If an industrial user performs functions of a pretreatment category, but no pretreatment standards exist under the category, are they still considered a categorical industrial user?

Example: 40 CFR Part 405– Dairy Products Processing Point Source Category

Question No. 11

When should secondary containment for chemical storage be provided? Is it for all chemicals non-hazardous and hazardous?

Question No. 12

During entry to an inspection, we are asked to sign a non-disclosure agreement. What are some general statements to have prepared in response to this request?

Does EPA require specific
treatment technology for
SIUs?





Does EPA require specific treatment methodologies?

- No – EPA requires compliance with the issued permit or regulations.
- Should you decide what treatment technology an IU should use to comply?