

## **Region 6 Strategy for Metal Finishing Master List Compilation**

*Region 6 Strategic Goals Program Metal Finishing Workgroup*

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One of the most diligent goals of this workgroup has been to ensure that there is a comprehensive list of metal finishers, including possible Tier 4 facilities. Using SIC (Standard Industrial Classification) codes that cover metal finishing and other industries that perform metal finishing as a sideline to their primary function, searches have been conducted of several databases. The SIC codes utilized and their definitions are:

- 3471 Electroplating, Plating, Polishing, Anodizing and Coloring
- 3479 Coating, Engraving and Allied Services, Not Elsewhere Classified
- 3672 Printed Circuit Boards
- 3674 Semiconductors and Related Devices
- 3676 Electronic Resistors
- 3679 Electronic Components Not Elsewhere Classified

### **Identifying Facilities**

Databases that have been searched are :

- EPA Databases (including RCRA, AIR, NPDES, TSCA, FIFRA, and EPCRA 313),
- Dun & Bradstreet (available at [http://valley.rtpnc.epa.gov/enviro/html/ef\\_query.html](http://valley.rtpnc.epa.gov/enviro/html/ef_query.html) ),
- OSHA (available at <http://www.osha.gov/oshstats/>).

Every database has a different list and while there are duplications, compiling the information from all of them is well worth the time and energy invested. This ensures the most comprehensive list of the metal finishing universe.

In addition, POTW's in the State were asked to give information on metal finishing facilities that they were aware of in their jurisdiction - both before and after the list was compiled. This ensures that we have the most up to date information as some of the facilities may have closed or moved and the POTW's tend to have the most frequent interaction with facilities. Co-workers whose programs may include work with metal finishers are another valuable resource. (i.e. Region 6 Water Quality Division Pretreatment Program and Compliance Assurance and Enforcement Division Air, RCRA, and Water Branches supplied information they may have had.

Other resources used:

- Thomas Regional Industrial Buying Guide (available on the internet at [http://www.thomasregional.com/newtrd/c\\_home.html](http://www.thomasregional.com/newtrd/c_home.html)),
- Texas Manufacturer's Register 1999,
- Directory of Texas Manufacturers 1999
- Phone directories (both Internet and Area Yellow Pages)

Many facilities that do not report are located in these information sources as it is an advertising avenue for them, it is also a useful way to update information that may have changed such as phone numbers and addresses. Phone directories are useful because it is one of the few ways to locate facilities without using an SIC code which can be easily falsified or misreported. If InfoUSA is available for use in your region, it is a good resource. However, it is still unclear how they break down their SIC codes into smaller categories and how they verify the information on what a facility is doing. Currently we are trying to find the answers to these questions before utilizing this resource to add facilities to the list - it is used to verify information on facilities.

Using all of these tools together is the most reliable way to compile a list of metal finishers that is representative of the universe. When having fewer resources and time limitations, using the EPA databases, Dun & Bradstreet and the phone books would be essential. Then moving on to the manufacturing indexes for your state and the Thomas Regional Industrial Buying Guide as resources allow. Most online information can be searched and loaded directly into a database or other software while the manufacturing indexes hard copies are more time consuming. However, they are both equally important in producing an accurate and thorough listing which can be edited later.

### **Compiling and Updating List**

All of the information gathered has been placed into an MS Access database which includes (for each facility): city, facility name, RCRA (EPA) ID (if found), Address, Zip Code, Contact Name and Number, SIC code(s), whether there is an Approved Pretreatment Program in the city, whether or not the facility has access to POTW service, whether or not chromium plating occurs at facility, and additional comments if any.

Once the database was compiled, copies were distributed to POTW's and other stakeholder members to review their area of the State and give any edits or deletes encountered. This is one of the most effective and important portions of compiling the database. The input from these sources is invaluable as they know the area and have more immediate access to verifying the existence of the facilities.

### **Identifying Possible Tier 4 Facilities**

After the edits had been received, the database was sorted based on different factors to identify possible Tier 4 facilities. They are as follows:

1) *No EPA ID, No Access to POTW service, No Approved Pretreatment Program*

This list will include RCRA non-notifiers which do not have access to POTW service and are typically located in rural areas outside the service area for POTWs. Such facilities may discharge wastewater to a septic system or use an evaporator to reduce their volume of wastewater generated. These facilities are not currently being monitored by any program.

2) *No EPA ID, No Approved Pretreatment Program, and Access to POTW service*

This list will include RCRA non-notifiers which do have access to POTW service but the POTW

is not authorized to administer a pretreatment program. Such smaller POTWs typically do not have adequate resources or technical expertise to monitor these facilities. In this situation, the State regulatory agency or EPA Regional office become the pretreatment control authority and facilities are required to report annually directly to them. Most likely, if the facility has not notified the appropriate regulatory agency of its RCRA status, they are also not submitting required pretreatment reports.

3) *EPA ID, No Approved Pretreatment Program, No Access to POTW Service*

This list will include RCRA notifiers which do not have access to POTW service and are typically located in rural areas outside the service area for POTWs. Such facilities pose a significant potential to discharge wastewater to a septic system or use an evaporator to reduce their volume of wastewater generated. These facilities may be subject to RCRA requirements, as their treatment system is not subject to Clean Water Act regulations.

4) *Chrome Platers*

This list will consist of chrome platers for determining Chromium MACT compliance.

The database is intended to grow and change over time as new information becomes available on facilities in the state. Facilities that are placed on the Tier 4 lists are only possible Tier 4 facilities until they can be verified by inspection of the proper regulatory agency.