|  |
| --- |
| Industry name |
| Facility Located at Street Address |
| City, State, Zip |

The information provided by you on this questionnaire serves two functions:

1. The information is used to determine if your facility needs an industrial User Pretreatment Permit (IUP) for the discharge of wastewater to the local sewer.

2. If an Industrial User Pretreatment Permit (IUP) is required, this survey serves as the application for an Industrial User Pretreatment Permit (IUP).

Requests for confidential treatment of information provided on this form shall be governed by procedures specified in 40 CFR Part 2. In accordance with Title 40 of the Code of Federal Regulations Part 403, Section 403.14 and the Local Sewer Use Ordinance (SUO), information and data provided in this questionnaire which identifies the content, volume and frequency of discharge shall be available to the public without restriction.

|  |
| --- |
| This is to be signed by an authorized official of your firm, as defined in the Local Sewer Use Ordinance or the NC Model Sewer Use Ordinance, Section 1.2, after completion of this form. |
| I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment for knowing violations. |
|  |  |  |  |  |  |
|  | Signature of Authorized Representativelisted above (seal if applicable) |  |  | Date  |  |

**PART I: Contact Information**

Signatory Authority for Permit Application and Reporting

Name:

Title

Phone Number:

Email Address:

Contact Address:

Alternate Contact

Name:

Title:

Phone Number:

Email Address:

Contact Address:

Does This Contact Have Signatory Authority?

Billing Contact Information

Name:

Title:

Phone Number:

Email Address:

Contact Address:

**PART II: Questionnaire**

1. Provide a brief narrative description of the type of business, manufacturing processes, or service activities your firm conducts at this site.

2. List the primary products produced at this facility:

3. List raw materials and process additives used

4. Are biocides added to any water discharged to the POTW, if yes describe:

5. Describe weekly production schedule, including shifts worked per day, employees per shift, and primary operation during shift. Indicate if process wastewater will be discharged during each shift.

6. Is the production process batch, continuous, or mixed? If mixed include percentages. Describe.

7. Does production vary significantly (± 20 %) by season. Describe.

8. Are there any significant (± 20 %) changes in production that will affect wastewater discharge expected in the next 5 years. If yes, please describe.

9. List all current waste haulers. Give name, address, phone numbers, volume and materials hauled.

10. Do you have any underground storage tanks at your facility? If yes, list contents and volume of each tank.

11. Do you have any above ground storage tanks at your facility? If yes, for each tank, list the contents, volume, whether the tank has any spill prevention or containment devices, such as dikes, and procedures for draining any containment devices.

12. Is the location of this facility owned by the applicant company or is it owned by another entity? If the property is not owned by the applicant, include contact information identifying the landlord, leaser, property manager or similar entity.

13. Do you have, or have you ever applied for, been issued, or been denied an NPDES permit to discharge to the surface waters or storm sewers of North Carolina? If yes, list all other NPDES permits, permit numbers, dates, and names used to apply for them, or reason denied.

14. Do you have, or have you ever applied for or been issued an Industrial User Pretreatment Permit (IUP) to discharge wastewater to the sewer collection system. If yes, list all other IUP permits, permit numbers, dates, and names used to apply for them.

15. Do you have, or have you ever applied for or been issued any other Environmental Permits (for example; air, RCRA, groundwater, stormwater, general, Non-Discharge, septic tank, etc.). If yes, list all other permits, permit numbers, dates, and names used to apply for them.

16. To the best of your knowledge, are any per- and polyfluoroalkyl substances (PFAS) in use or production at the facility that would be discharged to the sewer system, for example as a material or product? If yes, describe.

**Part III: Additional Documents**

1. Include a copy of the most recent Spill Prevention Control and Countermeasure (SPCC) Plan or Slug/Spill Plan if one is prepared for this facility. If this application is for a permit renewal submit the most recent edition of these documents if they have not already been submitted.

2. Attach a copy of laboratory analyses performed in the last year on the wastewater discharge(s) from your facilities, unless already submitted. Summarize data on the attached Wastewater Pollutant Checklist.

3. Attach a copy of laboratory analyses for PFAS, using Method 1633 for each permitted outfall or proposed discharge location.

4. Attach a site map or schematic showing sampling points, process areas, and all connections to the sewer.

|  |
| --- |
| **PART IV: Water Supply, Use, & Disposal Worksheet** |
| **Water Used for:** | **Water Source(s)** | Avg. gal/day | Max. gal/day | Measured or Estimated? | **Disposal Method(s)** | Avg. gal/day | Max. gal/day | Measured or Estimated? |
| Process water |   |   |   |   |   |   |   |   |
| Washdown water |   |   |   |   |   |   |   |   |
| Water into product |   |   |   |   |   |   |   |   |
| Air Quality Permitted units |   |   |   |   |   |   |   |   |
| Domestic toilets, drinking, cafe |  |   |   |   |   |   |   |   |
| Cooling water, Process NON-Contact |  |   |   |   |   |   |   |   |
| Boiler / Cooling tower blowdown |  |   |   |   |   |   |   |   |
| Cooling water, HVAC |   |   |   |   |   |   |   |   |
| Other: |   |   |   |   |   |   |   |   |
|   |   |   |   |   |   |   |   |   |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|   |  |  |  |  |  |  |   |   |
|  |  |  |  |  |  |  |  |  |
|  | Totals => |  |   |   | Totals => |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Typical Water Sources: |  |  |  |  | Possible Water Disposal Methods |  |  |  |
| City/Public supply, private drinking water wells, groundwater remediation wells, private ponds, or surface waters of NC | Sanitary sewer (without pretreatment), sanitary sewer (with pretreatment), storm sewer, surface waters of NC, evaporation, land applied, to groundwater, septic tank, waste haulers, or water into production. |

**PART V: Pretreatment Facilities:**

Are there any pretreatment devices or processes used for treating wastewater before being discharged to the sewer? Check all that are present and describe.

[ ]  1. No Pretreatment Facilities

[ ]  2. Flow Equalization

[ ]  3. Activated Carbon

[ ]  4. Activated Sludge

[ ]  5. Air Stripping

[ ]  6. Centrifugation

[ ]  7. Chemical Precipitation

[ ]  8. Chlorination

[ ]  9. Cyanide Destruction

[ ]  10. Cyclone

[ ]  11. Dissolved Air Floatation

[ ]  12. Filtration

[ ]  13. Flocculation

[ ]  14. Grease Trap

[ ]  15. Grit Removal

[ ]  16. Ion Exchange

[ ]  17. Neutralization, pH adjust

[ ]  18. Ozonation

[ ]  19.Reverse Osmosis

[ ]  20.Screening

[ ]  21.Sedimentation

[ ]  22.Septic Tank

[ ]  23.Silver Recovery

[ ]  24.Solvent Separation

[ ]  25.Spill protection

[ ]  26.List any others.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Describe:

**PART VI: Categorical Information**

1. When were operations started at this facility

2. List all Standard Industrial Classification/North American Industry Classification System (SIC/NAICS) codes for your facility. These may be found on State Unemployment forms, tax forms, accounting records, or from the Chamber of Commerce.

3. Has this facility ever been considered a Categorical Industrial User (CIU) as described by the Code of Federal Regulations (40 CFR)? If yes, give complete 40 CFR number.

4. Are any other facilities owned and/or operated by your company permitted as Categorical Industrial Users (CIUs) as described by the Code of Federal Regulations (40 CFR)? If yes please give name(s), location, and 40 CFR number.

**PART VII: Categorical Information Continued**

5. Check any activities listed below that are performed at your facility:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Check below | 40 CFR# | **Industrial Activity** | Check below | 40 CFR# | **Industrial Activity** |
|  |  |  |  |  |  |
|  | 467 | Aluminum forming |  | 432 | Meat products |
|  | 427 | Asbestos manufacturing |  | 433 | Metal finishing |
|  | 461 | Battery manufacturing |  | 464 | Metal molding and casting |
|  | 431 | Builders paper & board mills |  | 436 | Mineral mining and processing |
|  | 407 | Canned & preserved fruits & veg. |  | 471 | Nonferrous metal, form & powders |
|  | 408 | Canned & preserved seafood |  | 421 | Nonferrous metals manufacturing |
|  | 458 | Carbon black manufacturing |  | 414 | OCPSF, organic chemicals, plastics,  |
|  | 411 | Cement manufacturing |  |  |  & synthetic fiber manufacturing |
|  | 434 | Coal mining |  | 435 | Oil & gas extraction |
|  | 465 | Coil coating |  | 440 | Ore mining and dressing |
|  | 468 | Copper forming |  | 446 | Paint formulating |
|  | 405 | Dairy products processing |  | 443 | Paving and roofing materials mfg. |
|  | 469 | Electrical, electronic components |  | 455 | Pesticide manufacturing |
|  | 413 | Electroplating |  | 419 | Petroleum refining |
|  | 457 | Explosives manufacturing |  | 439 | Pharmaceutical manufacturing |
|  | 412 | Feedlots |  | 422 | Phosphate manufacturing |
|  | 424 | Ferroalloy manufacturing |  | 459 | Photographic supplies |
|  | 418 | Fertilizer manufacturing |  | 463 | Plastics molding and forming |
|  | 464 | Foundries, metal mold & casting |  | 466 | Porcelain enameling |
|  | 426 | Glass manufacturing |  | 430 | Pulp, paper, and paperboard |
|  | 406 | Grain mills |  | 428 | Rubber manufacturing |
|  | 454 | Gum & wood chemicals mfg. |  | 417 | Soap & detergent manufacturing |
|  | 460 | Hospitals |  | 423 | Steam electric power generation |
|  | 447 | Ink formulating |  | 409 | Sugar processing |
|  | 415 | Inorganic chemical manufacturing |  | 410 | Textile mills |
|  | 420 | Iron & steel manufacturing |  | 429 | Timber products processing |
|  | 425 | Leather tanning & finishing |  | Others |  |

|  |
| --- |
| **Wastewater Pollutant Checklist** |
|  |  |   |   |   |   |   |
| **Chemical Name** | Chemical Abstract Number CAS# | Check if Present at Facility | Check if Absent at Facility | Check if Present in Discharge | Check if Absent in Discharge | Concentration in Discharge, if Known(mg/l) |
|  |  |  |  |  |  |  |
| **Acid Extractable Organic Compounds (EPA Method 625)** |
| 2-Chlorophenol | 95-57-8 |  |  |  |  |  |
| 2,4-Dichlorophenol | 120-83-2 |  |  |  |  |  |
| 2,4-Dimethylphenol | 105-67-9 |  |  |  |  |  |
| 2,4-Dinitrophenol | 51-28-5 |  |  |  |  |  |
| 2-Methyl-4,6-dinitrophenol | 534-52-1 |  |  |  |  |  |
| 4-Chloro-3-methylphenol | 59-50-7 |  |  |  |  |  |
| 2-Nitrophenol | 88-75-5 |  |  |  |  |  |
| 4-Nitrophenol | 100-02-7 |  |  |  |  |  |
| Pentachlorophenol | 87-86-5 |  |  |  |  |  |
| Phenol | 108-95-2 |  |  |  |  |  |
| 2,4,6-Trichlorophenol | 88-06-2 |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Base Neutral Organic Compounds (EPA Method 625)** |
| 1,2,4-Trichlorobenzene | 120-82-1 |  |  |  |  |  |
| 1,2-Dichlorobenzene | 95-50-1 |  |  |  |  |  |
| 1,2-Diphenylhydrazine | 122-66-7 |  |  |  |  |  |
| 1,3-Dichlorobenzene | 541-73-1 |  |  |  |  |  |
| 1,4-Dichlorobenzene | 106-46-7 |  |  |  |  |  |
| 2,4-Dinitrotoluene | 121-14-2 |  |  |  |  |  |
| 2,6-Dinitrotoluene | 606-20-2 |  |  |  |  |  |
| 2-Chloronaphthalene | 91-58-7 |  |  |  |  |  |
| 3,3-Dichlorobenzidine | 91-94-1 |  |  |  |  |  |
| 4-Bromophenyl phenyl ether | 101-55-3 |  |  |  |  |  |
| 4-Chlorophenyl phenyl ether | 7005-72-3 |  |  |  |  |  |
| Acenaphthene | 83-32-9 |  |  |  |  |  |
| Acenaphthylene | 208-96-8 |  |  |  |  |  |
| Anthracene | 120-12-7 |  |  |  |  |  |
| Benzidine | 92-87-5 |  |  |  |  |  |
| Benzo (a) anthracene | 56-55-3 |  |  |  |  |  |
| Benzo (a) pyrene | 50-32-8 |  |  |  |  |  |
| Benzo (b) fluoranthene | 205-99-2 |  |  |  |  |  |
| Benzo (ghi) perylene | 191-24-2 |  |  |  |  |  |
| Benzo (k) fluoranthene | 207-08-9 |  |  |  |  |  |
| Bis(2-chloroethoxy) methane | 111-91-1 |  |  |  |  |  |
| Bis(2-chloroethyl) ether | 111-44-4 |  |  |  |  |  |
| Bis(2-chloroisopropyl) ether | 102-60-1 |  |  |  |  |  |
| Bis(2-ethylhexyl) phthalate | 117-81-7 |  |  |  |  |  |
| Butyl benzyl phthalate | 85-68-7 |  |  |  |  |  |
| Chrysene | 218-01-9 |  |  |  |  |  |
| Di-n-butyl phthalate | 84-74-2 |  |  |  |  |  |
| **Wastewater Pollutant Checklist** |
| **Chemical Name** | Chemical Abstract Number CAS# | Check if Present at Facility | Check if Absent at Facility | Check if Present in Discharge | Check if Absent in Discharge | Concentration in Discharge, if Known(mg/l) |
|  |  |  |  |  |  |  |
| **Base Neutral Organic Compounds continued (EPA Method 625)** |
| Di-n-octyl phthalate | 117-84-0 |  |  |  |  |  |
| Dibenzo (a,h) anthracene | 53-70-3 |  |  |  |  |  |
| Diethyl phthalate | 84-66-2 |  |  |  |  |  |
| Dimethyl phthalate | 131-11-3 |  |  |  |  |  |
| Fluoranthene | 206-44-0 |  |  |  |  |  |
| Fluorene | 86-73-7 |  |  |  |  |  |
| Hexachlorobenzene | 118-74-1 |  |  |  |  |  |
| Hexachlorobutadiene | 87-68-3 |  |  |  |  |  |
| Hexachlorocyclopentadiene | 77-47-4 |  |  |  |  |  |
| Hexachloroethane | 67-72-1 |  |  |  |  |  |
| Indeno(1,2,3-cd) pyrene | 193-39-5 |  |  |  |  |  |
| Isophorone | 78-59-1 |  |  |  |  |  |
| N-nitroso-di-n-propylamine | 621-64-7 |  |  |  |  |  |
| N-nitrosodimethylamine | 62-75-9 |  |  |  |  |  |
| N-nitrosodiphenylamine | 86-30-6 |  |  |  |  |  |
| Naphthalene | 91-20-3 |  |  |  |  |  |
| Nitrobenzene | 98-95-3 |  |  |  |  |  |
| Phenanthrene | 85-01-8 |  |  |  |  |  |
| Pyrene | 129-00-0 |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Metals** |  |  |  |  |  |  |
| Aluminum |  |  |  |  |  |  |
| Antimony | 7440-36-0 |  |  |  |  |  |
| Arsenic | 7440-38-2 |  |  |  |  |  |
| Barium | 7440-39-3 |  |  |  |  |  |
| Beryllium | 7440-41-7 |  |  |  |  |  |
| Cadmium | 7440-43-9 |  |  |  |  |  |
| Chromium | 7440-47-3 |  |  |  |  |  |
| Copper | 7440-50-8 |  |  |  |  |  |
| Lead | 7439-92-1 |  |  |  |  |  |
| Mercury | 7439-97-6 |  |  |  |  |  |
| Molybdenum | 7439-98-7 |  |  |  |  |  |
| Nickel | 7440-02-0 |  |  |  |  |  |
| Selenium | 7782-49-2 |  |  |  |  |  |
| Silver | 7440-22-4 |  |  |  |  |  |
| Thalium | 7440-28-0 |  |  |  |  |  |
| Zinc | 7440-66-6 |  |  |  |  |  |
| **Wastewater Pollutant Checklist** |
|  |  |   |   |   |   |   |
| **Chemical Name** | Chemical Abstract Number CAS# | Check if Present at Facility | Check if Absent at Facility | Check if Present in Discharge | Check if Absent in Discharge | Concentration in Discharge, if Known(mg/l) |
|  |  |  |  |  |  |  |
| **Other Inorganic Pollutants** |  |  |  |  |  |  |
| Chloride |  |  |  |  |  |  |
| Cyanide | 57-12-5 |  |  |  |  |  |
| Fluoride |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Purgeable Volatile Organic Compounds [VOCs] (EPA Method 624)** |
| 1,1,1-Trichloroethane | 71-55-6 |  |  |  |  |  |
| 1,1,2,2-Tetrachloroethane | 79-34-5 |  |  |  |  |  |
| 1,1,2-Trichloroethane | 79-00-5 |  |  |  |  |  |
| 1,1-Dichloroethane | 75-34-3 |  |  |  |  |  |
| 1,1-Dichloroethylene | 75-35-4 |  |  |  |  |  |
| 1,2-Dichloroethane | 107-06-2 |  |  |  |  |  |
| 1,2-Dichloropropane | 78-87-5 |  |  |  |  |  |
| 2-Chloroethyl vinyl ether | 110-75-8 |  |  |  |  |  |
| Acrolein | 107-02-8 |  |  |  |  |  |
| Acrylonitrile | 107-13-1 |  |  |  |  |  |
| Benzene | 71-43-2 |  |  |  |  |  |
| Bromodichloromethane | 75-27-4 |  |  |  |  |  |
| Bromoform | 75-25-2 |  |  |  |  |  |
| Bromomethane | 74-83-9 |  |  |  |  |  |
| Carbon tetrachloride | 56-23-5 |  |  |  |  |  |
| Chlorobenzene | 108-90-7 |  |  |  |  |  |
| Chloroethane | 75-00-3 |  |  |  |  |  |
| Chloroform | 67-66-3 |  |  |  |  |  |
| Chloromethane | 74-87-3 |  |  |  |  |  |
| cis 1,3-Dichloropropene |  |  |  |  |  |  |
| Dibromochloromethane | 594-18-3 |  |  |  |  |  |
| Ethylbenzene | 100-41-4 |  |  |  |  |  |
| Methylene chloride | 75-09-2 |  |  |  |  |  |
| Tetrachloroethylene | 127-18-4 |  |  |  |  |  |
| Toluene | 108-88-3 |  |  |  |  |  |
| trans 1,3-Dichloropropene |  |  |  |  |  |  |
| trans-1,2-Dichloroethylene | 156-60-5 |  |  |  |  |  |
| Trichloroethylene | 79-01-6 |  |  |  |  |  |
| Trichlorofluoromethane |  |  |  |  |  |  |
| Vinyl chloride | 75-01-4 |  |  |  |  |  |
| Xylene |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Other Pollutants of Concern** |  |  |  |  |  |  |
| BOD |  |  |  |  |  |  |
| TSS |  |  |  |  |  |  |
| Total Nitrogen (TN) |  |  |  |  |  |  |
| Ammonia |  |  |  |  |  |  |
| Total Phosphorus (TP) |  |  |  |  |  |  |

**Part VIII: Waste Reduction Information**

State Pretreatment Rule 15A NCAC 2H.0916 (c)(1)(M) requires Significant Industrial Users to include a description of current and projected waste reduction (pollution prevention) activities. The codes listed are standard EPA codes found on Toxic Release Inventory and other environmental forms. Please check all applicable codes for your facility related to wastewater discharge.

|  |  |  |  |
| --- | --- | --- | --- |
| **Current** | **Projected**  | **Code** | **Description** |
|  |  | W13 | Improved maintenance scheduling recordkeeping, or procedures |
|  |  | W14 | Changed production schedule to minimize equipment and feedstock changeovers |
|  |  | W19 | Other changes in operating practices (explain briefly in comments) |
|  |  | W21 | Instituted procedures to ensure that materials do not stay in inventory beyond shelf-life |
|  |  | W22 | Began to test outdated material-continue to use if still effective |
|  |  | W23 | Eliminated shelf-life requirements for stable materials |
|  |  | W24 | Instituted better labeling procedures  |
|  |  | W25 | Instituted clearinghouse to exchange materials that would otherwise be discarded |
|  |  | W29 | Other changes in Inventory control (explain briefly in comments) |
|  |  | W31 | Improved storage or stacking procedures |
|  |  | W32 | Improved procedures for loading, unloading and transfer operations |
|  |  | W33 | Installed overflow alarms or automatic shutoff valves |
|  |  | W34 | Installed secondary containment |
|  |  | W35 | Installed vapor recovery systems |
|  |  | W36 | Implemented inspection or monitoring program of potential spill or leak sources |
|  |  | W39 | Other spill and leak prevention (explain briefly in comments)  |
|  |  | W41 | Increased purity of raw materials |
|  |  | W42 | Substituted raw materials |
|  |  | W49 | Other raw material modifications (explain briefly in comments) |
|  |  | W51 | Instituted recirculation within a process |

|  |  |  |  |
| --- | --- | --- | --- |
| **Current** | **Projected**  | **Code** | **Description** |
|  |  | W52 | Modified equipment, layout, or piping |
|  |  | W53 | Use of a different process catalyst |
|  |  | W54 | Instituted better controls on operating bulk containers to minimize discarding of empty containers |
|  |  | W55 | Changed from small volume containers to bulk containers to minimize discarding of empty containers |
|  |  | W58 | Other process modifications (explain briefly in comments) |
|  |  | W59 | Modified stripping / cleaning equipment |
|  |  | W60 | Changed to mechanical stripping / cleaning devices (from solvents or other materials) |
|  |  | W61 | Changed to aqueous cleaners (from solvents or other materials) |
|  |  | W62 | Reduced the number of solvents used to make waste more amenable to recycling |
|  |  | W63 | Modified containment procedures for cleaning units |
|  |  | W64 | Improved draining procedures |
|  |  | W65 | Redesigned parts racks to reduce dragout |
|  |  | W66 | Modified or installed rinse systems |
|  |  | W67 | Improved rinse equipment design |
|  |  | W68 | Improved rinse equipment operation |
|  |  | W71 | Other cleaning and degreasing operation (explain briefly in comments) |
|  |  | W72 | Modified spray systems or equipment |
|  |  | W73 | Substituted coating materials used |
|  |  | W74 | Improved application techniques |
|  |  | W75 | Changed from spray to other system |
|  |  | W78 | Other surface preparation and finishing (explain briefly in comments) |
|  |  | W81 | Changed product specifications |
|  |  | W82 | Modified design or composition of product |
|  |  | W83 | Modified packaging |
|  |  | W89 | Other product modifications (explain briefly in comments) |
|  |  | W99 | Other (specify in comments) |