



**REGION 8**

DENVER, CO 80202

Ref: 8WD-CWW

**SENT VIA EMAIL**  
**ELECTRONIC READ RECEIPT REQUESTED**

Chris Banfield  
Environmental Health and Safety Manager  
Tolmar Inc.  
[Chris.banfield@tolmar.com](mailto:Chris.banfield@tolmar.com)

Re: EPA Pretreatment Notification of Categorical Industrial User Requirements, ICIS Number:  
CO-PF00106

Dear Mr. Banfield:

Tolmar is categorized as a Categorical Industrial User (CIU) subject to the Pharmaceutical Manufacturing Point Source Category Pretreatment Standards at 40 C.F.R. 439.47 and monitoring, reporting and notification requirements at 40 C.F.R. 403.12. Tolmar is an industrial user of the City of Windsor's publicly owned treatment works (POTW), which does not have a Pretreatment Program approved by the U.S. Environmental Protection Agency. Therefore, the EPA Region 8 serves as the Control Authority and directly oversees compliance of industrial users that discharge to the City of Windsor's POTW and is partnering with the City to ensure its POTW is protected from potential impacts of pollutants discharged from non-domestic sources.

Enclosed is information regarding Tolmar's discharge requirements as a CIU (Enclosure 1, Categorical Industrial User Requirements), effective February 15, 2024. This enclosure sets forth specific notification and reporting requirements the EPA has established in accordance with the SIU definition found in 40 C.F.R. Part 403.3(v). Enclosure 2 is the associated fact sheet, which provides a rationale for the conditions set forth in Enclosure 1.

The Categorical Industrial User Requirements and Fact Sheet were public noticed on the EPA's website on December 4, 2023 for a 30-day public comment period. There were no substantive comments received.

The Pretreatment Regulations at 40 C.F.R. 403.12(j) require Tolmar to promptly notify the EPA and the City of Windsor in advance of any substantial change in the volume or character of pollutants in its discharge. These substantial changes could include changes at Tolmar that may affect its compliance with the CIU requirements contained in this notification such as changes to the operations, wastestream generation, and/or wastewater management that may affect the status of Tolmar under the Pretreatment Regulations.

Nothing contained in this notification package or in any EPA regulations restrict State or local agencies from imposing additional requirements in accordance with applicable laws, including requirements which are more stringent than those imposed by the EPA.

If you have any questions about the enclosed information, please contact Al Garcia at 303-312-6382 or [garcia.al@epa.gov](mailto:garcia.al@epa.gov).

Sincerely,

Michael Boeglin, Supervisor  
Wastewater Section

Enclosures:

1. Categorical Industrial User Requirements under the Pharmaceutical Manufacturing Point Source Category and the General Pretreatment Regulations
2. Tolmar Fact Sheet

cc:

Dennis Markham, POTW Superintendent, City of Windsor  
Jon Wallace, Pretreatment Coordinator, Colorado Department of Public Health and Environment