



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **Economic Impact Analysis**

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### **Construction Stormwater General Permit– NPDES Permit and State Waste Discharge General Permit**

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# **Economic Impact Analysis**

## **Construction Stormwater General Permit–NPDES and State Waste Discharge General Permit**

*by*

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# Table of Contents

- Executive Summary ..... v
- Compliance Requirements for the Construction Stormwater General Permit..... 1
  - Monitoring and inspections..... 2
  - Minimum treatment technology..... 2
  - Reporting and record keeping..... 2
  - SWPPP submittal ..... 3
  - Equipment..... 3
  - Labor ..... 3
  - Supplies..... 3
  - Administration ..... 3
- Overview of Analysis ..... 3
  - Definition of small and large businesses ..... 4
  - Compliance costs excluded from the EIA ..... 4
  - Compliance costs included in the EIA..... 4
  - Data used in the analysis..... 4
  - Time ..... 5
- Estimated Costs for Complying with the Permit ..... 6
  - Monitoring ..... 6
  - Inspections ..... 7
  - Training..... 7
  - Log books..... 7
  - Records ..... 7
  - Total compliance costs..... 8
  - Conclusion of estimated costs..... 8
- Appendix..... 11



# Executive Summary

The Construction Stormwater General Permit (CSWGP) allows businesses to proceed with construction activity under a general permit rather than having to obtain a state or National Pollutant Discharge Elimination System (NPDES) individual permit.

WAC 173-226-120 Economic Impact Analysis requires The Department of Ecology (Ecology) to prepare an economic analysis for the CSWGP. The analysis must include:

- A brief description of the compliance requirements of the general permit.
- The estimated costs for complying with the permit, based on existing data for facilities intended to be covered under the general permit.
- A comparison, to the greatest extent possible, of the cost of compliance for small businesses with the cost of compliance for the largest ten percent of the businesses intended to be covered under the general permit.
- A summary of how the permit provides mitigation to reduce the effect on small businesses (if a disproportionate impact is expected), without compromising the mandated intent of the permit.

A small business is defined as an independent entity with 50 or fewer employees organized for the purpose of making a profit. Enterprises owned by larger corporations are excluded, as are not-for-profit and government enterprises.

Ecology identified and analyzed five aspects of the permit that will add costs:

- Monitoring
- Inspections
- Log books
- Training
- Records

The requirements of this permit are estimated to add costs of \$4,135 per year for sites with 1-5 acres. Sites with over five acres are estimated to have added costs of \$6,885 per year.

Ecology concluded, based on this result, that **the general permit has a disproportionate impact on small businesses**. On a cost-per-employee basis the costs are generally greater for small businesses than for large businesses. This is because most of the costs are a function of the size and topography of the job site. For each compliance area, the expected impact is disproportionate, even if small job sites are paired with small businesses and large job sites are paired with large businesses.

Ecology has included the following mitigation features in the CSWGP to reduce the burden on small businesses.

- Sites smaller than 1 acre are exempt from turbidity and transparency monitoring.
- Sites less than 5 acres are given the option to use a lower cost transparency tube (\$40) for stormwater monitoring instead of turbidity meter (\$900).

- Phasing in Certified Erosion and Sediment Control Lead (CESCL) requirements allowed smaller operators to schedule and attend training during the 2005 permit cycle. The 2010 permit requires operators to have a CESCL perform inspections and sampling at a nominal cost of \$280/year.
- Operators may be allowed to omit aspects of the SWPPP (and not implement BMPs), if site conditions render that element unnecessary. This allows qualifying small sites, or those with less complexity, to have fewer BMPs than large or complex sites. As a result, small sites should have lower SWPPP/BMP costs.
- The low rainfall erosivity waiver (permit exemption) is available for certain projects smaller than five acres. This will only affect sites that meet the waiver criteria, but should significantly lower costs.
- Some facilities may qualify for and receive an extreme hardship permit fee reduction under the Wastewater Discharge Permit Fee Rule (Chapter 173-224 WAC). Extreme hardship applies only if the annual gross revenue of goods and services produced using the processes regulated under the permit is \$100,000 or less and the fee poses an extreme hardship to the business.



# Compliance Requirements for the Construction Stormwater General Permit

The Construction Stormwater General Permit (CSWGP) allows businesses to proceed with construction activity under a general permit rather than having to obtain a state or National Pollutant Discharge Elimination System (NPDES) individual permit.

The CSWGP requires:

- An application packet, including a Notice of Intent form and associated public notice.
- Preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that describes stormwater best management practices (BMPs) to prevent erosion and sedimentation and protect water quality.
- Periodic site inspections by permittees to ensure that BMPs are properly installed and maintained. Inspections must be conducted by certified personnel (Certified Erosion and Sediment Control Leads), and be documented in a site log book.
- Monitoring and sampling by permittees of stormwater discharges for the following:
  - Turbidity and transparency.
  - If the project includes significant concrete work or engineered soils, pH monitoring is also required.
  - Monitoring for other pollutants if there is a discharge to certain types of 303(d)-listed impaired water-bodies or water-bodies with a Total Daily Maximum Load (TMDL).
- A monthly Discharge Monitoring Report submitted by permittees to the Department of Ecology (Ecology) to document compliance with the numeric and narrative effluent limitations, and demonstrate SWPPP performance.
- A submittal by permittees of any documentation required by the permit to Ecology or the public upon request.
- The assurance by permittees that their projects do not cause or contribute to violations of state water quality standards.

# Monitoring and inspections

The following table summarizes the primary monitoring requirements<sup>1</sup>.

**Table 1: Primary monitoring requirements**

Size of Soil Disturbance	Weekly Site Inspections	Weekly Sampling with Turbidity Meter	Weekly Sampling with Transparency Tube	Weekly pH Sampling <sup>2</sup>
Less than 1 acre	Required	Not Required	Not Required	Not Required
1 – 5 acres	Required	Sampling Required- either method		Required
More than 5 acres	Required	Required	Not Required	Required

## Minimum treatment technology

The permit does not have a specific minimum treatment required; rather, a performance standard is used that is site specific. In accordance with 40 CFR 122.44(k) and 40 CFR 122.44(s), the CSWGP includes requirements to develop and implement Stormwater Pollution Prevention Plans (SWPPPs) including Best Management Practices (BMPs). This is to minimize or prevent the discharge of pollutants to waters of the state.

The BMPs in the SWPPP meet the federal requirements for Best Conventional Pollutant Control Technology (BCT) and Best Available Technology Economically Achievable (BAT) for stormwater discharges. In addition, Ecology has determined that development of a SWPPP and implementation of adequate BMPs in accordance with this permit constitutes All Known, Available, and Reasonable Methods of Prevention, Control, and Treatment (AKART).

Water treatment is based on the appropriate selection of BMPs from approved technical manuals. These BMPs are used as necessary, to achieve performance standards and prevent violations of water quality standards. Some sites will require very basic erosion and sediment control BMPs (mulch, silt fence, etc.) while others will need extensive treatment technologies (sediment ponds, filters, etc.). The applicant identifies the necessary treatment BMPs in the SWPPP prior to beginning construction activity covered by the permit. Ecology may require the permittee to make revisions (e.g., add or modify BMPs) based on site inspections and stormwater monitoring.

## Reporting and record keeping

Permittees must submit sampling data to Ecology on monthly Discharge Monitoring Reports (DMRs). DMRs may be submitted via US mail or be submitted electronically using Ecology’s WebDMR system. Ecology may request additional records from permittees.

The permittee must keep the permit documents on site or within reasonable access to the site for use by the operator, or for on-site review by Ecology or the local jurisdiction. Permit

<sup>1</sup> Additional monitoring requirements may apply for: 1) discharges to 303(d) listed waterbodies and waterbodies with applicable TMDLs for turbidity, fine sediment, high pH, or phosphorus - see Condition S8; and 2) sites required to perform additional monitoring by Ecology order – see Condition G13.

<sup>2</sup> If construction activity results in the disturbance of 1 acre or more, **and** involves significant concrete work (1,000 cubic yards of poured or recycled concrete) or the use of engineered soils (soil amendments including but not limited to Portland cement-treated base [CTB], cement kiln dust (CKD), or fly ash), **and** stormwater from the affected area drains to surface waters of the State or to a storm sewer or stormwater collection system that drains to or other surface waters of the state, the Permittee must conduct pH monitoring sampling.

documentation includes all monitoring information (site log book, sampling results, inspection reports/checklists, etc.), SWPPP and any other documentation of compliance with permit requirements. Records must be kept for the entire life of the construction project and for a minimum of three years after the termination of permit coverage.

## **SWPPP submittal**

All permittees must have a SWPPP. When submitting an application to Ecology the applicant does not have to include a copy of the SWPPP unless Ecology specifically requests it.

## **Equipment**

The permittees will most likely buy monitoring equipment as it is likely to be less expensive than paying for a professional monitoring service. The SWPPP may call for equipment such as pumps or tanks to manage stormwater. On large complex sites the SWPPP may require the use of heavy equipment to build a retention pond or engineered structures.

## **Labor**

The permittee must respond to the day-to-day permit requirements of protecting water quality in the site vicinity. The permittee will need to dedicate time and effort to:

- Apply for the permit.
- Write and comply with the SWPPP.
- Perform monitoring and site inspections.
- Reporting requirements.
- Install and maintain BMPs.

## **Supplies**

The permittee may need pH strips and sampling supplies, paper, and a note book for the log book. The SWPPP may call for BMP materials and supplies such as silt fence, erosion control matting, grass seed, and straw mulch.

## **Administration**

The site manager will need to ensure compliance with the SWPPP and the monitoring and reporting requirements.

# **Overview of Analysis**

This Economic Impact Analysis (EIA) estimates the costs of complying with the CSWGP. It also compares the costs of complying with the permit for small businesses to the costs of compliance for large businesses, to determine whether the permit disproportionately impacts small businesses.

## Definition of small and large businesses

For the purpose of this EIA, a small business is an independent entity with 50 or fewer employees organized for the purpose of making a profit. Enterprises owned by larger corporations are excluded, as are not-for-profit and government enterprises. There are both small and large businesses that must comply with this permit.

## Compliance costs excluded from the EIA

The costs associated with requirements of the CSWGP that result from conformity or compliance, or both, with federal or other state laws or regulations are not considered in this EIA.

The justification for excluding compliance costs related to these laws and rules is that permit holders cannot be exempt from these laws or rules through the permit process and, therefore, any associated cost impacts cannot be mitigated. Permit holders must comply with existing regulation independent of permit requirements.

## Compliance costs included in the EIA

According to WAC 173-226-120, the EIA must estimate the costs of the following:

- The minimum technology based treatment requirements identified as necessary under WAC 173-226-070;
- The monitoring requirements contained in the general permit;
- The reporting and recordkeeping requirements;
- Any plan submittal requirements;
- The costs of equipment, supplies, labor, and any increased administrative costs.

As some costs are interconnected, a more appropriate breakdown of compliance costs that will be analyzed for this general permit (still including all of the required elements) is:

- Monitoring
- Inspections
- Training
- Log books
- Records

## Data used in the analysis

Currently there are over 2,000 businesses<sup>3</sup> covered under the Construction Stormwater General Permit. The CSWGP is sometimes issued to a general contractor and sometimes to the individual or company who owns and is developing the site. In any case, the permit holder must meet the definition of “operator”<sup>4</sup>.

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<sup>3</sup> Based on data downloaded from PARIS on June 21, 2010. PARIS (Permit and Reporting Information System) is a new permit database introduced at Ecology in April 2010.

<sup>4</sup> Operator means any party associated with a construction project that meets the following two criteria:

- The party has operational control over construction plans and specifications, including the ability to make modifications to those plans and specifications; and

The CSWGP affects a variety of individuals and industry classifications from nearly every major sector of the economy. NAICS (North American Industry Classification System) codes and descriptions used in this analysis are listed in Appendix A.

The data available regarding employment for existing permittees is limited. Most of the permittees are not listed in Workforce Explorer<sup>5</sup>; many projects are identified by site location. Ecology also cannot protect employment data gathered from any non-public source for this kind of analysis. Therefore, the use of sparse publicly available data was necessary.

Most existing permits were written for sites with one to five acres of disturbed area. The average disturbed acreage is 14 acres. Ecology is using 12 employees as a representative employment for small businesses and 330 as representative employment for large businesses. For the purpose of this study, a small business is defined as a company with 50 or fewer employees while a large company has more than 50 employees.

Some costs are taken from the 2005 Economic Impact Analysis completed for the CSWGP issued in 2005. These data were brought up to date by applying a 10.85 percent inflationary factor for 2005-2010<sup>6</sup>.

## Time

All of the values estimated are annual. Some sites may not require a permit for a full year. These sites may therefore have lower costs related to permit coverage. On the other hand, at these same sites, employees must still be trained to conduct inspections, resulting in additional costs.

The typical business covered under the permit has construction as their primary income source. It is expected that these businesses will simply move on to another site after finishing work at one site. Thus representing costs annually allows the “typical” construction firm to dominate the analysis and recognizes construction companies as the primary type of permittee covered by the CSWGP.

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- The party has day-to-day operational control of those activities at a project that are necessary to ensure compliance with a SWPPP for the site or other permit conditions (for example, they are authorized to direct workers at a site to carry out activities required by the SWPPP or comply with other permit conditions).

<sup>5</sup> Workforce Explorer- Labor Market and Economic Analysis. Washington State Employment Security Department <http://www.workforceexplorer.com/>

<sup>6</sup> Gross National Product: Implicit Price Deflator- U.S. Department of Commerce: Bureau of Economic Analysis <http://research.stlouisfed.org/fred2/data/GNPDEF.txt>

# Estimated Costs for Complying with the Permit

## Monitoring

Monitoring costs will depend on both the frequency of heavy rain and the number of discharges from a disturbed area at the site. Sites in Western Washington will require more monitoring and have higher costs; the number of rainfall events that are sufficient to generate discharges is greater in Western Washington than Eastern Washington.

Likewise, large sites may have more discharge points than small sites; however, the number of discharges may depend on the shape or topography as much as the size of a disturbed area. A large site with a single discharge point may require less effort than a small site with an odd topography and several discharges. Therefore, these costs are not strictly proportional to the size of the site. The cost of monitoring is also not a function of the size of the business running the site.

The following table shows the average annual number of rainfall events likely to result in a discharge from the site (half an inch/24-hour event) in a sample of major Washington cities.

**Table 2: Rainfall events per year and number of permits**

	Rainfall Events Per Year	Number of Permits
<b>Western WA</b>		
Port Angeles	13	26
Mt. Vernon	16	89
Bellingham	18	129
Seattle (UW)	21	510
Tacoma	22	255
Vancouver	23	211
<b>Eastern WA</b>		
Richland	1	13
Yakima	2	29
Spokane	9	26

Ecology estimates the monitoring costs for turbidity and pH based on:

1. There are 19.8 weeks during which there would be a discharge to monitor<sup>7</sup>.
2. The estimated cost of labor is \$32.50 per hour.<sup>8</sup>
3. Sampling and entering results is expected to require an hour for turbidity for 1-5 acre sites and 2 hours for 5+ acre sites<sup>9</sup>. Extra pH testing is expected to require 10 minutes.<sup>10</sup>
4. Transparency tubes are estimated to cost \$38<sup>11</sup> and the average cost per use of a turbidity meter is estimated to cost \$15.
5. pH strips are estimated to cost \$14.50 for 80 strips including shipping and handling.

<sup>7</sup> This is a weighted average of the number of events based on the number of sites in each area.

<sup>8</sup> Washington State Department of Labor and Industries- Journeyman carpenter union wage rate to individuals including benefits.

<sup>9</sup> Jeff Killelea, Washington State Department of Ecology, Water Quality Program June 29, 2010

<sup>10</sup> Note that some jobs sites that discharge to an impaired water body may have additional monitoring. Phosphorus and copper would cost \$25 and \$15 respectively and would probably have to be done off site. These costs were not included because they are not typical.

<sup>11</sup> <http://watermonitoringequip.com/pages/stream.html>

Ecology estimates monitoring costs for sites acres 1-5 at \$700 per year and \$1,100 per year for sites 5+ acres. The person performing monitoring and recording the results must have training as a “Certified Erosion and Sediment Control Lead” (cost described below under “Training”).

## Inspections

Inspection costs will depend on the number of discharges from a disturbed area and the complexity of Best Management Practices (BMPs) in place to prevent stormwater contamination, and treat stormwater when necessary. These costs vary in part based on the site characteristics, including topography, soils, and the size of the site. Thus these costs are not strictly proportional to the size of the property. The cost of inspections is also not a function of the size of the business running the site. The following table shows the total costs per year for inspections.

**Table 3: Total annual costs for inspections**

	<b>1-5 acres</b>	<b>5+ acres</b>
<b>Time</b>	1 hour	2 hours
<b>Cost of Labor</b>	\$32.50	\$32.50
<b>Number of Inspection Events<sup>12</sup></b>	71.8	71.8
<b>Total Cost</b>	\$2,350	\$4,700

## Training

The person performing inspections and conducting the monitoring and recording the results must have training as a “Certified Erosion and Sediment Control Lead” or CESCL. The cost of training is unrelated to the job site and the number of employees in the firm. The average 2010 price of the 16-hour class is about \$400<sup>13</sup>, plus a labor cost for that time, plus travel to and from the class of 60 miles. An 8-hour recertification course is required after 3 years and is valid for another 3 years. The average cost for the recertification course is about \$250<sup>13</sup>.

Ecology estimates an annualized cost of \$280 based on the class, recertification, and labor and travel time.

## Log books

The results from inspections must be recorded in the log book. The log book entry is expected to take 10 minutes during each inspection. Using the wage rate of \$32.50 and 71.8 inspection events, Ecology estimates a cost of \$400 per year.

## Records

Permittees must keep records for the entire length of the construction project and for a minimum of three years following the termination of permit coverage. Permittees must file Discharge Monitoring Reports (DMRs) monthly. Ecology assumed companies will choose to do electronic filings and estimates that, at most, reporting will take one hour per month. At a \$32.50 per hour wage rate, Ecology estimates this requirement will cost businesses \$400 per year.

<sup>12</sup> There are 19.8 weeks during which there would be rain events requiring inspection, in addition to the weekly inspections.

<sup>13</sup> Certified Erosion and Sediment Control Lead- Training and Certification Programs  
<http://www.ecy.wa.gov/programs/wq/stormwater/cescl.html>

## Total compliance costs

This section presents the total costs to comply with the Construction Stormwater General Permit.

**Table 4: Costs to comply with permit**

Requirements	1-5 acres	5+ acres
Monitoring	\$700	\$1,100
Inspections	\$2,350	\$4,700
Training	\$280	\$280
Log Book	\$400	\$400
Records	\$400	\$400
<b>Total</b>	<b>\$4,130</b>	<b>\$6,880</b>

## Conclusion of estimated costs

The following table is a summary of estimated costs required by the CSWGP as well as the ratio for cost per employees to small and large businesses.

**Table 5: Summary of estimated costs**

Cost per Employee Ratios			Small Businesses Average 12 employees	Large Businesses Average 330 employees
Requirements	1-5 acres	5+ acres	Cost/Employee	Cost/Employee
Monitoring	\$700	\$1,100	\$58.00	\$3.33
Inspections	\$2,350	\$4,700	\$196.00	\$14.24
Training	\$280	\$280	\$23.00	\$0.85
Log Book	\$400	\$400	\$33.00	\$1.21
Records	\$400	\$400	\$33.00	\$1.21
Total	\$4,130	\$6,880		
1 - 5 acres and small employer			\$344.00	
1 - 5 acres and large employer				\$20.85
5+ acres and small employer			\$573.00	
5+ acres and large employer				\$12.52

Based on these results, Ecology concludes that **the general permit has a disproportionate impact on small businesses.** For each compliance area, the expected impact is disproportionate, even if small job sites are paired with small businesses and large job sites are paired with large businesses.

## Mitigation of disproportionate impacts

If the compliance cost ratio is higher for small businesses than for large businesses, then small businesses are disproportionately impacted. Ecology concluded that this is the case for the reissued CSWGP.

The general permit rule (WAC 173-226-120) requires that disproportionate economic impacts of general permits on small businesses be reduced, when it is both legal and feasible to do so.

Legality and feasibility are determined by the legal context of existing state and federal laws and rules, such as the State Water Pollution Control Act (Chapter 90.48 RCW) and the federal Clean



Water Act. Cost impacts on small businesses are reduced, where legal and feasible, by modifying the conditions of the permit.

Mitigation involves one or more of the following:

- Establishing differing compliance or reporting requirements or timetables for small businesses.
- Clarifying, consolidating, or simplifying the compliance and reporting requirements under the general permit for small businesses.
- Establishing performance rather than design standards.
- Exempting small businesses from parts of the general permit.

In each of the features listed below, Ecology used the flexibility available to reduce costs. This will reduce costs for the affected small businesses but will also reduce costs for large businesses. Ecology amended the general permit to mitigate its impacts on small businesses as follows.

1. Establish differing compliance or reporting requirements or time tables for small business:
  - Sites smaller than 1 acre are exempt from turbidity and transparency monitoring.
  - Sites less than 5 acres are given the option to use a lower cost transparency tube (\$40) for stormwater monitoring instead of turbidity meter (\$900).
  - Phasing in Certified Erosion and Sediment Control Lead (CESCL) requirements allowed smaller operators to schedule and attend training during the 2005 permit cycle. The 2010 permit requires operators to have a CESCL perform inspections and sampling at a nominal cost of \$280/year.
2. Establish performance rather than design standards:
  - This allows operators to omit some requirements among the 12 elements if site conditions render the requirements unnecessary. This allows small sites, or those with less complexity, to have fewer BMPs than large or complex sites. As a result, small sites should have lower SWPPP/BMP costs.
3. Exempt small businesses:
  - The low rainfall erosivity waiver (permit exemption) is available for certain projects smaller than 5 acres. This will only affect sites that meet the waiver criteria, but should significantly lower costs.
4. Extreme hardship permit fee reduction:
  - Some facilities may qualify for and receive an extreme hardship permit fee reduction under the Wastewater Discharge Permit Fee Rule (Chapter 173-224 WAC). Extreme hardship applies only if the annual gross revenue of goods and services produced using the processes regulated under the permit is \$100,000 or less and the fee poses an extreme hardship to the business.



# Appendix

The following is a list of the North American Industry Classification System (NAICS) codes and descriptions affected by this permit.

NAICS	DESCRIPTION	NAICS	DESCRIPTION
111219	Other Vegetable (except Potato) and Melon Farming	519120	Libraries and Archives
111998	All Other Miscellaneous Crop Farming	521110	Monetary Authorities - Central Bank
112990	All Other Animal Production	522110	Commercial Banking
212399	All Other Nonmetallic Mineral Mining	522130	Credit Unions
221122	Electric Power Distribution	523930	Investment Advice
221310	Water Supply and Irrigation Systems	524210	Insurance Agencies and Brokerages
236115	New Single-Family Housing Construction	531110	Lessors of Residential Buildings
236118	Residential Remodelers	531120	Lessors of Nonresidential Buildings
236220	Commercial Building Construction	531130	Miniwarehouses and Self-Storage Units
237110	Water and Sewer System Construction	531190	Lessors of Other Real Estate Property
237210	Land Subdivision	531210	Offices of Real Estate Agents & Brokers
237310	Highway, Street, and Bridge Construction	531311	Residential Property Managers
237990	Other Heavy Construction	532120	Truck, Trailer and RV Rental and Leasing
238110	Poured Concrete Foundation and Structure Contractors	532310	General Rental Centers
238160	Roofing Contractors	541711	Research and Development in Biotechnology
238210	Electrical Contractors and Other Wiring Installation Contractors	561439	Other Business Service Centers
238910	Site Preparation Contractors	561730	Landscaping Services
238990	All Other Specialty Trade Contractors	561990	All Other Support Services
311999	All Other Miscellaneous Food Mfg	562212	Solid Waste Landfill
312130	Wineries	611110	Elementary and Secondary Schools
321912	Cut Stock, Resawing Lumber, and Planing	611210	Junior Colleges
321999	All Other Miscellaneous Wood Product Manufacturing	611310	Colleges and Universities
324110	Petroleum Refineries	611410	Business and Secretarial Schools
325211	Plastics Material and Resin	61151	Flight Training

NAICS	DESCRIPTION	NAICS	DESCRIPTION
	Manufacturing	2	
325314	Fertilizer (Mixing Only) Manufacturing	621111	Offices of Physicians (except Mental and Health Specialists)
332312	Fabricated Structural Metal Mfg	621511	Medical Laboratories
336111	Automobile Manufacturing	621999	Miscellaneous Ambulatory Health Care Svc
336411	Aircraft Manufacturing	622110	General Medical and Surgical Hospitals
336413	Other Aircraft Parts and Equipment	622210	Psychiatric & Substance Abuse Hospitals
423220	Home Furnishing Merchant Wholesalers	623110	Nursing Care Facilities
423310	Lumber and Wood Merchant Wholesalers	623312	Homes for the Elderly
423320	Masonry Material Merchant Wholesalers	624190	Other Individual and Family Services
423510	Metal Merchant Wholesalers	624310	Vocational Rehabilitation Services
423990	All Other Durable Goods Merchant Whsle	711212	Racetracks
424420	Packaged Frozen Food Merchant Wholesalers	712130	Zoos and Botanical Gardens
424480	Fresh Fruit and Vegetable Merchant Wholesalers	712190	Nature Parks & Other Similar Institution
424490	Other Grocery and related Products Merchant Wholesalers	713290	Other Gambling Industries
424720	Other Petroleum Merchant Wholesalers	713910	Golf Courses and Country Clubs
424930	Nursery & Florist Merchant Wholesalers	713930	Marinas
441110	New Car Dealers	721110	Hotels (except Casino Hotels) and Motels
441210	Recreational Vehicle Dealers	721199	All Other Traveler Accommodations
441310	Automotive Parts and Accessories Stores	722110	Full-Service Restaurants
444220	Nursery, Garden & Farm Supply Stores	722211	Limited-Service Restaurants
445110	Supermarkets and Other Grocery Stores	811118	Other Automotive Mechanical Repair
445230	Fruit and Vegetable Markets	812220	Cemeteries and Crematories
446110	Pharmacies and Drug Stores	812930	Parking Lots and Garages
446191	Food (Health) Supplement Stores	813110	Religious Organizations
447190	Other Gasoline Stations	813410	Civic and Social Organizations
452111	Department Stores (except Discount Department Stores)	813910	Business Associations
453110	Florists	921110	Executive Offices

<b>NAICS</b>	<b>DESCRIPTION</b>	<b>NAICS</b>	<b>DESCRIPTION</b>
453220	Gift, Novelty, and Souvenir Stores	92112 0	Legislative Bodies
482111	Line-Haul Railroads	92119 0	Other General Government Support
488119	Other Airport Operations	92216 0	Fire Protection
488510	Freight Transportation Arrangement	92411 0	Air, Water and Waste Program Admin
493120	Refrigerated Warehousing and Storage	92512 0	Urban and Rural Development Admin
493130	Farm Product Warehousing and Storage	92612 0	Transportation Program Administration
512131	Motion Picture Theaters, ex. Drive-Ins	92613 0	Utility Regulation and Administration